City of Lacey
Public Participation Element

September 2011

“I am a firm believer in the people. If given the truth, they can be depended upon to meet any national crisis. The great point is to bring them the real facts.”
Abraham Lincoln
CITY OF LACEY MISSION
Our mission is to enrich the quality of life in Lacey for all our citizens. To build an attractive, inviting, and secure community; We pledge to work in partnership with our residents to foster community pride, to develop a vibrant, diversified economy, to plan for the future, and to preserve and enhance the natural beauty of our environment.

Picture of the open house held January 2010 at Lacey City Hall to review the draft Lacey Shoreline Master Program. An
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I. Introduction

Public Participation: Public participation is the process by which public concerns, needs, and values are incorporated into governmental decision making. Citizen participation is essential to local issues of community development, from an initial land use plan to the siting of parks, the routing of vehicular and pedestrian traffic, and to determining what street tree theme should be required for new development.

This Public Participation element of the City of Lacey Comprehensive Plan provides a framework for public participation as a central focus of Lacey’s organizational culture. Its purpose is to describe the city’s policies for citizen participation and support ways to achieve successful partnering with citizens, organizations and business in planning, developing, and maintaining our community.

In considering the benefits, legal requirements and many options and techniques for achieving successful citizen participation, the following goal is adopted as part of Lacey’s public participation program:

1. Goal: Promote and maintain active community involvement in the planning decision process, whereby all who are affected have the opportunity to be informed and participate in the decision process.

Policies: To implement the identified goal the following policies are adopted:

a. Policy: Apply the most appropriate public participation tools and methodology based upon the planning task, objectives and resources available.

b. Policy: Follow the principles and the intent of the Public Participation Element in the development of, and in taking action on, planning tasks to effectively provide an opportunity for citizen participation in planning programs.

c. Policy: Provide information about the structure of city government and decision processes to organizations and the general public to enable effective participation.

d. Policy: Encourage and facilitate public participation in planning activities by designing user friendly processes tailored to individual efforts that inform and
educate the public about the substance of issues and that provide opportunities for involvement.

e. **Policy:** Proactively inform citizens of programs, educational information and/or pending issues; where appropriate, use city publications, email, direct mail, video broadcast, city web site, print media and other techniques discussed in the Public Participation Element.

f. **Policy:** Develop public participation strategies for planning projects and/or decision processes to inform target groups and citizens with an interest in particular planning activities. Where appropriate to engage target audiences, consider the use of various outreach techniques such as opinion surveys, speaker programs, forums, workshops, open houses, hands-on events, task forces and newer technologies such as email, internet and social media, as well as new innovative techniques and ideas as they are identified.

g. **Policy:** Encourage open communication between developers and neighbors about project compatibility with adjacent properties.

h. **Policy:** Encourage neighborhood residents, neighborhood organization representatives, and home owner associations to work with the City to develop Comprehensive Land Use Plan monitoring and implementation programs and capital improvement plans for neighborhood areas.

i. **Policy:** Provide city representation and participation, as staff resources allow, at meetings held by homeowner associations, and civic and business groups, to provide information on current and pending planning issues affecting the city.

**Core Values of the City**

In the development of the goal and policies for citizen participation, the City referred to several core values established by the International Association for Public Participation. The following core values for public participation are considered by the City as key to a strong and open public participation process:

1. The public should have a say in decisions about actions that affect their lives.
2. Public participation includes the promise that the public’s contribution will influence the decision.
3. The public participation process communicates interests and meets the process needs of participants.
4. The public participation process seeks out and facilitates involvement of those potentially affected.
5. The public participation process involves participants in defining how they participate.
6. The public participation process provides participants with the information they need to participate in a meaningful way.
7. The public participation process communicates to participants how their input affected the decision.

II. Why Participate?

Frequently individual citizens do not get involved in planning and community development until a project is proposed in their own neighborhood. Often concerns grow from an activity such as tree cutting on a vacant lot, or construction of an apartment complex, and a citizen is concerned about neighborhood character and property values. It is at that point that citizens ask why would this be allowed in my neighborhood? What can I do about it?

The state has a mandatory planning law for jurisdictions like Lacey called the Growth Management Act, (GMA), the intent of which is to limit sprawl and require new development within designated growth boundaries. This is called “smart growth” because it makes the provision of urban services less expensive to deliver, makes transportation options more practical, conserves land resources, and has less environmental impact to our community. The GMA was designed to prepare communities to plan for statewide and local population growth, and to provide for a broad range of uses including medical, government, institutional, commercial, industrial and other non-residential uses to efficiently provide services to meet the needs of the growing population.

Locally, Lacey is expected to add over 30,000 people to the city and adjacent growth area in the next 20 years. Under the GMA framework, Lacey is charged with developing plans for housing, commercial and industrial areas that will provide jobs and services, as well as for the provision of municipal services based on the near doubling of the population.

The increases in housing, worksites, commercial venues, municipal services and amenities will require changes to the community landscape. These changes include higher densities, compact growth, mixed use or multipurpose construction, and superior design expectations. Growth will require changes in the way development is located and designed, and how the City provides for passive and active recreational space. While engaging in community planning activities to accommodate these changes, the City is committed to maintaining and improving the quality of life enjoyed by its citizens.

With the changes that will take place within the community, the City needs the help of its citizens in crafting the long-term vision of the community. There are many options to consider and strategies and tools to help in this task. With active citizen participation, Lacey can take advantage of the GMA growth projections to enhance the community by developing neighborhoods that are well designed and attractive, that have qualities and focal points that make them desirable and memorable, and that provide opportunities for 

A journey of a thousand miles begins with a single step.
Lao Tsu
social interaction; neighborhoods that are both livable and sustainable. Lacey strives to facilitate public involvement and wants all members of the public to join in the planning of the community.

III. The Foundation for Public Participation and State Requirements

The 1990 Growth Management Act (GMA) requires “early and continual citizen participation” in the development and updates of local comprehensive plans. A specific goal of the GMA is to “Encourage the involvement of citizens in the planning process.”

The basic legal requirement for public participation is spelled out in RCW 36.70A.140, which states that every jurisdiction:

“shall establish and broadly disseminate to the public a public participation program identifying procedures providing for early and continuous public participation (emphasis added) in the development and amendment of comprehensive land use plans and development regulations implementing such plans.”

The GMA does not dictate specific methods to achieve citizen participation because the law was intended to be a bottom up approach. There is considerable flexibility in how this is accomplished. Additional guidance is provided in RCW Chapter 36.70A.140 titled Comprehensive Plans – Ensure Public Participation, it cites:

“broad dissemination of proposals and alternatives, opportunity for written comments, public meetings after effective notice, provision for open discussion, communication programs, information services, and consideration of and response to public comments.”

The intent is clear: involve the public, provide opportunities to have meaningful input and give consideration of that input with emphasis on providing direct responses.

In addition to being required by the GMA, public participation is a good business practice. Like good customer service, a good public participation program builds trust and credibility and can earn the respect of involved citizens. Ultimately it results in better and more responsive services to meet the needs of citizens. Some of the benefits of public participation include:

- An increased public trust in government;
- Engaged citizens that take ownership of local growth management challenges and solutions;
- Creates educated and empowered citizens;
- Encourages good planning and citizen support;
- Removes hearings board challenges to public participation rules;
- Increases the opportunity for new and innovative ideas;
- Brings people with firsthand knowledge of the neighborhood to the table;
• Creates interaction between people who care about the community and their neighborhood, thereby building a network of people Lacey can look to for help on more global issues as well as local neighborhood concerns.

Many of these benefits were enhanced by Lacey’s past public participation practices and can be seen in the success of Lacey’s community development and planning projects and legislation.

Lacey has a tradition of involving the public in developing successful planning projects. This process recognizes citizens and interested organizations as partners in the planning and development of the community. It is the intent of this plan to continue Lacey’s commitment to excellence in public participation and improve Lacey’s public participation opportunities.

“A failure in the public participation process undermines the very core of the GMA and the legitimacy of adopted or amended comprehensive Plan provisions and development regulations. The City must err on the side of involving the public in GMA decisions”
Eastern Washington Growth Management Hearings Board
(December 5, 2002)

IV. Current and Long Range Planning Project Review

Planning projects in the City of Lacey are divided into two broad groups, current and long range. Long range planning projects include development of planning documents incorporating the vision for the City and create goals and policies which are intended to guide development. The current planning processes implements the goals and policies developed during the long range process.

Current Planning:
The review process for current planning projects, such as a residential subdivision or a commercial site plan review, was standardized under a state law called regulatory reform which involved consistent methods for informing the public. Methods vary depending on the type of project being reviewed and may include; a legal advertisement in the newspaper of record and on-site posting. There are specific requirements for the time local governments have to process permits as well as procedures that must be followed during the permit review process. Public participation and commenting is encouraged. Members of the public have the opportunity to talk to a planner who will listen to specific concerns and identify how their concerns are addressed by existing ordinances. If the project is still in the permitting process and issues are identified that can be addressed through the permitting process, conditions mitigating those issues may be made part of the decision.

There are two levels of review for current planning activities:
1. **Limited and Full Administrative Project Review:**
   Limited and full administrative project review is used when a project is subject to objective and subjective standards requiring the exercise of limited discretion about non-technical issues and about which there may be limited public interest. Examples of projects falling under this level of review include commercial site plan review applications, binding site plans, single family building permits, design review and exempt tree removal requests.

   Projects falling under administrative review are submitted and designed to meet requirements that developed through earlier public review processes and have been codified in the Lacey Municipal Code. This is considered the last phase of a jurisdiction's review where there is limited authority under state law to require something other than that which is specified within the applicable ordinances. Under limited and full administrative review, projects do not require a public hearing. Legal notices for these types of projects are published in the newspaper and members of the public are welcome to discuss issues or concerns with a planner.

2. **Quasi-Judicial Review:**
   The quasi-judicial review process is used when a development or use proposed by the land use application requires a public hearing before a Hearing Examiner. Included within this type of review are subdivisions, conditional use permits, planned residential development, variances, certain wetland development permits, shoreline substantial development permits, administrative appeals, master plans and other similar applications.

   Projects that require Hearing Examiner review have a legal basis for more detailed review. State law provides for public participation at a public hearing. At the hearing, those with an interest are encouraged to ask questions and make comments about the project and, where appropriate, comments are incorporated into conditions of approval. However, the jurisdiction is still limited in what it can consider as it applies conditions to projects. A citizen may comment in opposition to the density or the size of lots proposed in a subdivision, but the jurisdiction must adhere to the standards prescribed in the zoning code that was developed during the long range planning process establishing those standards that are based on the goals and policies of the comprehensive plan. The City cannot require a standard different from that prescribed in the code unless there are significant environmental impacts at risk or unique site conditions. Conditions applied to a project based upon citizen testimony must be consistent with the adopted ordinances, or based upon an environmental impact identified in an environmental impact analysis, or the jurisdiction will be vulnerable to a legal challenge.

**Long Range Planning:**
Long range planning projects have different objectives for participation. The long range planning decision is expected to develop goals and policies based on citizen values and desires to create a “vision” for the community. Because long range planning efforts
establish goals and policies that will represent a pluralistic community, planning public participation is always of high importance to ensure representation of all segments of the community. Interested citizens and groups will vary dependant on the subject so a myriad of ideas and techniques may be used to accomplish the specific objectives of individually unique planning efforts. Public participation will determine the quality of the final product developed as well as the credibility it receives as a valid representation of the community’s vision.

**Long Range Planning Processes, Plan Development and Ordinance Writing:**
The Comprehensive Land Use Plan process can involve a range of activities from a simple amendment to address a specific issue to a major comprehensive update of an entire planning element. The process used for public involvement will vary accordingly. In the first example, a simple legal ad and notification of interested parties may be adequate. In the latter example, a far reaching public relations campaign using multiple techniques discussed in this plan might be justified.

The citizen has two specific points to engage the City in the long range planning process. The first is to comment on the adoption of the annual work program to help the City determine the topics for consideration. This takes place during a yearly docketing process in January.

The docketing process is established under the state Growth Management Act (GMA). This process is designed to provide a means of establishing a Planning Commission work-program for each year with an opportunity for the Council and Planning Commission to collaboratively consider items for inclusion in the annual work program. This process is also designed as an opportunity for the general public to officially request time in the work program for consideration of either publically initiated or privately initiated planning projects including Plan amendments, ordinance revisions, new legislation and any other long range planning projects that require Planning Commission review.

The second opportunity to engage the City is during the actual development of projects that have been added to the yearly work program. Opportunities to engage the City during development of the planning activity may involve any number of strategies from open house activities to standard Planning Commission work-sessions, to formal public hearings. The format of participation and substance of comments will differ dramatically dependent upon particular objectives of the proposal.

Lacey’s format for Planning Commission work-sessions is unique and effective. Participants are invited to the table to sit with the Planning Commission members and special interest groups. They are given the opportunity to participate equally in the topic discussion. While participants do not vote in the final decision, they provide perspective through discussions with the Planning Commission. The Planning Commission and staff take pride in the efforts to ensure that everyone leaves satisfied with the process and their opportunity to participate and that, while not always in full agreement, they understand the rationale for the final result.
V. Public Participation and the Final Decision

Public participation requires input from the public and real consideration of comments but does not necessarily mean the decision will reflect all comments received. Regardless of results of the public participation process, Lacey policy-makers must retain the ultimate decision making authority. While this may seem like something less than democratic, there are compelling reasons why the jurisdiction must retain this authority and decisions may sometimes seem independent of outcomes favored by participants.

In his book “the Public Participation Handbook”, James Creighton lists a number of reasons a governmental jurisdiction must retain this authority including:

- Government is constrained by mandates and authorities that limit what they can do.
- Government entities often have contractual obligations that must be met.
- The public that achieves consensus may do so because it is not paying the costs. Public participants with a consensus that someone else should pay for a special benefit of a few must be balanced by an intervening authority that can require attention to everyone that is paying for a project.
- In the final analysis, participants are self selecting; they do not, and cannot, claim to represent the “public” in the same way that an election speaks for the public. As such, the contribution of participants may be influential but should not be expected to dictate the final decision.

Participants might not like the fact that their suggestions were not implemented, but they deserve to be told the reasons. The majority of people understand that there are reasons you cannot always have what you want. As long as comments were considered and the decisions are based upon all of the available facts, most people will be satisfied with the process, if not the results.

“For participation is an essential ingredient of democracy, so is accountability. Public participation programs influence agency decisions, but they cannot be substituted for them.”

James L. Creighton “the Public Participation Handbook”

VI. Citizen Advisory Committee

In addition to participation in the planning process at the current or long range level, there are a number of commissions, committees and advisory boards on which citizens can volunteer their time and expertise. When openings occur, the City advertises and solicits for volunteers to submit applications. The Mayor will review the applications
received and with the Consent of the Council, appoint a citizen to the commission, committee or advisory board. These boards and commissions involve volunteer citizens participating in an organized way in a specific area of government activity.

Currently, the City Council appoints citizen representatives to the following boards and commissions:

City Boards and Commissions:
- The Planning Commission;
- The Historical Commission;
- Board of Park Commissioners.

Inter-jurisdictional Boards and Commissions:
- Library Board;
- Human Services Review Council;
- Thurston Community Television Board;
- Civil Service Commission;
- Law enforcement Officers, Fire Fighters, Disability Board;
- Lodging Tax Advisory Committee.

**The Planning Commission:**
The City has a citizen advisory committee for land use planning purposes. This committee is called the Planning Commission. The Planning Commission has roots in state planning enabling legislation, its responsibility and general composition and methods are established in state law.

Based on state law, the Planning Commission is the Council’s citizen advisory body on all matters of land use planning. It consists of nine citizen members, seven of whom must live in the City and two may reside in the adjacent designated growth area. Members may be appointed by the Council for up to two, three year terms. The intent of the Planning Commission is to have a broad cross section of citizens collectively advise the Council on land use planning tasks.

While the Planning Commission necessarily has to pull from a broad cross section of the City and growth area population, the job of the Planning Commissioner is not for everyone. Becoming a Planning Commissioner requires commitment, dedication, and personal demands and skills that include many hours of work, interpersonal skills, listening skills and visioning.

Because the job of the Planning Commissioner is so demanding and requires extraordinary listening and interpersonal skills, Lacey has a very comprehensive process to interview and select members. The interview panel will generally include the mayor, Chair of the Planning Commission, and a Community Development Department staff member. Citizens interested in becoming a member of the Planning Commission, or any other citizen committee, should contact the Lacey City Clerk. Additional information regarding citizen advisory boards and commissions is also available on the City’s Website.
VII. Public Participation Tools; Matching Techniques to Objectives

Not all Projects are Created Equal:
Not all of the tools to engage the public discussed within this section will be right for every planning project. As time and resources are limited, Lacey must ensure the tools selected are cost effective and can meet intended objectives. It is important to incorporate public participation techniques that are best suited for the planning project being undertaken. Some methods are better for getting information to the public and others are better at obtaining information from the public. Both are important aspects to a public participation strategy.

Considerations for Participation Tools:
There are many tools and techniques that can be applied to citizen participation. Each of these tools has strengths and weaknesses and some are better than others in particular situations. Some are specifically designed to accomplish particular public participation objectives and may not be particularly beneficial if misapplied. Because time and resources are limited, the goal is to apply the best strategies for a particular situation and need.

Some techniques have been around for many years and are familiar and well used but as new technology becomes available it opens new possibilities for approaching planning activities. Technology provides many new and exciting opportunities to make public participation easier, faster and more convenient. However, with new techniques come new challenges, particularly in adapting the technology so it can be applied in the public sector. There are many requirements jurisdictions must meet in the world of the “public” institution. Legislation and regulations such as Open Public Meetings Act, information disclosure, public records requests, and other laws specific to the public sector must be satisfied. These can often complicate the ability to implement new strategies involving information sharing.

Processes must be put in place to ensure requirements for documenting and tracking, and assuring the accuracy and consistency of information provided. In addition, management of these systems requires special expertise and can be labor intensive. In an environment of limited budgets, public funds must be spent wisely, ensuring the public the most benefit for the least expense.

Finally, security is an issue. Wide access to information requires the integrity and accuracy of the information sources be protected. There are also issues of privacy regarding release of customer information. Certain information concerning the integrity and security of essential public resources and services such as the public’s water supplies must be protected for general safety. Nonetheless a large number of “new” technologies have potential for increased public participation in community development activities.
Depending on the project scope, the objectives for public review and resources available, the Community Development Department will develop a public participation strategy incorporating, but not limited to, the techniques listed on the following pages.

Methods for Informing the Public:

A. **Brochures:** Brochures can be used as flyers, self-mailers, hand-outs, downloaded documents or e-mailed messages. Lacey will use brochures for certain projects and to provide public information on a specific topic and for general education.

B. **Cable Access - Community Television Stations:** Lacey uses this cable-based television opportunity to present Council meetings. This is also being considered for Planning Commission meetings where development of long range planning occurs. This is an opportunity to reach citizens who would not normally be involved in the process. It provides another opportunity to educate the public about the issues under consideration.

C. **Display/Reader Boards:** Lacey has two electronic message signs that can be used for large events, hearings, special open house meetings, etc.

D. **Flyer/Insert:** A flyer/insert is a simple and inexpensive way to get the word out fast about community issues. A flyer/insert can be sent through a paid mailing, but can also be included in regular mailings like city utility bills and/or property tax statements. Specific neighborhoods may be affected by a particular plan element. Neighborhood information can be coordinated with the local grade school administration for effective distribution.

E. **Newsletters:** A newsletter offers a great chance to send a message and provide information to a broad section of the citizenry. Newsletters can be produced and distributed electronically and printed or electronically published as a Portable Document Format (PDF). Articles for inclusion in organizational newsletters can also be submitted to business, church, and civic groups for publication in their periodic bulletins.

F. **Newspaper Articles:** One of the most effective ways of gaining the attention of the public is a front page article discussing the community development/planning project, the divergence of views, the central issues and a call for help. The City works with the reporter assigned to the Lacey area from the Olympian. With any major planning activity the paper will publish a story or series of stories informing the public about the project.

“There is no such thing as a one size fits all public participation (and beware of people who think there is)”

James Creighton, Author of “The Public Participation Handbook”
G. **Posting Public Notice:** Posting a public notice is a legal requirement for advertising public hearings. It occurs in two ways: site posting and advertisement in the local newspaper in what are called “legal ads”. This technique is used for both long-range and short-range (current planning) projects. Site posting will occur at key intersections involved in the project or area-wide proposal. Proposals that apply city-wide are “posted” on the City’s web site, and advertised in the paper. Publications in the local newspaper will generally occur a minimum of 10 days before the advertised event.

H. **E-mail:** E-mail is an easy to use communication tool providing a direct link into community development activities and updates.

I. **Geographical Information System (GIS) and Mapping Tools:** Maps show geographical information allowing web-users to point out areas where they want to see housing/development changes.

J. **Webcasting, Podcasting:** Audio and video tools on the internet are increasingly becoming mainstream as a way to share information online in radio shows through podcasts and TV shows through webcasts.

**Methods for Obtaining Information from the Public:**

A. **Citizen (Steering) Advisory Committees:** Special committees are established as an extension of standing City Commissions where specialized groups are invited to send a representative to sit on the committee to provide expertise and participate in recommendations forwarded to the full Commission and City Council. Citizen advisory committees can be especially effective for special pieces of legislation, issues that require specialized expertise, or difficult/controversial topics.

B. **Citizen Surveys:** A citizen survey is a kind of opinion poll which typically asks area residents their views on local issues. It may include planning/community development preferences and thoughts as well as gauging satisfaction levels with current activities. These kinds of surveys can be done in person or by mail, telephone or on the internet.

C. **Public Hearing:** A public hearing is a special meeting that provides a more structured setting and process for the public to comment on proposed plans and projects before officials make a final decision. It is a recorded and formal process. Public hearings are an open public meeting and all citizens are invited to present their views for the official record, both verbally and in writing, before the hearing body makes its decision.

D. **Penny Weighting Polls:** The nonscientific survey provides participants with pennies (usually 10 each) and asks them to put them into pre-labeled jars according to priority of importance. The jars can be associated with civic issues, from sewer issues to traffic problems to public transportation. People can put as
many pennies they want in each of the jars provided. It is an informal, easy to understand and enjoyable opportunity to help people prioritize a community’s needs.

E. E-Surveys: An E-Survey is a way to engage people online. It could be a short series of “check the box” questions from commercial products like Survey Monkey.

Methods for Informing and Obtaining Information:
A. Community Workshops: Workshops are a popular citizen participation method encouraging sharing of views and opinions within small work groups of six to nine people. The ideas expressed in these small groups are documented in a written report which is discussed by all attendees in general session at the end of the workshop. Information from these workshops is used in planning to illustrate how citizen goals, priorities and ideas help shape community planning decisions.

B. County/Community/Mall Fairs: A booth at a local mall or annual county fair can be a way to reach out to people who might not normally participate in community meetings or even know about a certain community issue. This process has been effective in getting brochures and information out to the public. Because booths are more useful as a tool for providing information they prove effective where projects are already implemented and community/citizen education is the primary goal.

C. Meeting in a Box: The “Meeting in a Box” concept started in Spokane in the mid-1990s as a way to take planning information to residents. It is a self-guided and individually hosted workshop that contains an instruction manual, a short video, brochures and maps. It has applicability for citizens who wish to host neighborhood meetings or home owner associations wanting to involve members in planning issues. While a comprehensive concept, it is expensive and labor intensive.

D. Public Meetings: Public meetings are a hallmark of public participation and a legitimate first step in any citizen participation process. Open access to regular public meetings of commissions and committees allows for technical information to be shared, opportunities and pathways for citizen participation and descriptions of plans and projects.

E. Task Force: This technique involves the appointment of a number of citizens representing specific interests or possessing special expertise to work on a single issue or special topic in a limited amount of time.

F. Dedicated Website: Lacey’s website provides the opportunity for display of all planning work on the internet for public review. Agendas and hearing notices are posted at the same time they are advertised in the paper. Planning documents, including staff reports about plan and ordinance revisions, are placed online for
review. This mechanism provides the opportunity to review the history of a project and review all of the pertinent documents related to the decision.

G. **Blogging:** A “blog” or “weblog” is an online journal. It is a place to enter text, photos and to explain the work being done. Blogs are also open for people to add comments, making them interactive and a good way to get feedback. Obstacles in implementation include staff time, consistency of responses with multiple inputs and verification of data.

H. **Internet and Social Networks:** The internet and modern technological innovations are expanding public access to decisions about growth and planning issues. The internet is a relatively new, but extremely important, way for decision makers to include citizens. In addition, the internet has made a whole new social network possible involving demographic profiles of citizens who may be difficult to reach through other media. Use of some of these new social media tools on the internet may reach people who have not previously been engaged to community development activities through conventional methods. Some of these new tools include Facebook, MySpace, Twitter, RSS Feeds and similar internet social network tools.

I. **Collaborative Online Documents:** These kinds of collaborations are documents that can be written/edited by several authors. Lacey uses this technique during the drafting of legislation with citizens groups and organizations that have interest in specific topics.