

SUBMISSION TO: *Plan Santa Barbara*
RE: Draft General Plan EIR

“ADAPTIVE MANAGEMENT” CAVEAT
(“We already tried that”)

The draft Plan proposes to enforce the development limitations that will be settled upon, not by revamping the zoning to reflect those limits, but by a process described as Adaptive Management.

Adaptive Management is to be a monitoring mechanism that relies upon analysis of feedback data in order to create a self-adjusting system to accomplish our goals and objectives. The draft Plan (p. 26, *et seq.*) describes, in very general terms, how this system is to work. In essence, the idea is: "let's go ahead with what is proposed; our safeguard for keeping it on track and in control is that we will carefully monitor how well or how poorly the development accomplishes the effects intended of it".

People involved in planning back in the 60's-70's will (or should) remember that we tried that, and soon abandoned it.

The movement was billed as PPBS (“Planning/Programming/Budgeting Systems”). It was modeled, as I recall, on McNamara's DOD systems for monitoring effectiveness and efficiency of expenditures and deployment of resources. It was adapted to urban planning, and was widely and enthusiastically employed by many planning authorities.

It was all the rage, but fell by the wayside for a number reasons, a primary one being that it was simply impossible to generate useful and unambiguous feedback data in a timely manner. The "feedback mechanisms" - accurate and objective apparatus to not only measure development, but to ascertain an accurate cause-and-effect relationship between it and what might be identified as its effects – were unworkable. The capacities and competencies to provide the pertinent data and methodologies for their objective interpretation never could be adequately developed. At last that was my recollection from back in the early 70s.

The technology and methodology simply was beyond the scope of local government (*all* governments, as it turned out). To my knowledge, nothing new in the way of sophisticated capability – at least at the local level - has since come about to change that.

It was a promising premise that simply overreached.

I'd request, before pursuing and relying upon “Adaptive Management”, that the EIR investigate whether capabilities now exist that assure that the approach can safely be relied upon (i.e., that it is more than just a good sounding idea).

That investigation should inquire, at the very least, into the following:
Does the City now have the technical capacity to compile the data necessary to make the critical measurements and determinations?
Does it have the criteria necessary to interpret the data accurately, unambiguously and objectively? Can it safely guarantee that such capability will exist at such time these determinations are to be made?

This, at the very least, is necessary since it was the failure of such technical capabilities that lead to the abandonment of similar "adaptive" management and planning endeavors in the past.

Respectively Submitted,

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