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The Planning Team  
Mendocino County Planning Department  
Room 1204  
501 Low Gap Road,  
Ukiah, CA 95482

#### Recommendation on the Draft General Plan Update: OPEN SPACE

Dear Planners,

I am a 27-year resident and taxpayer of the county with current residence address of 203 North State Street in Ukiah.

I am the editor/publisher of the MENDOCINO COUNTRY Independent newspaper, an environmentalist, acting chair of the Green Party of Mendocino County and secretary of the Voters Union, a nonpartisan organization dedicated to electing environmentalists to the Mendocino County board of supervisors.

In my opinion, the Mendocino County Draft General Plan Update as prepared by consultants PMC Inc. and submitted to the board of supervisors is totally insufficient, inadequate and obsolete. It should be scrapped and a different planning process begun to produce a completely new General Plan fit for the 21<sup>st</sup> century.

The proposed so-called Update is in fact just a boiler plate tweak of the 1981 General Plan, which itself was a remake of that cobbled together in the 1970s. The underlying social, environmental, economic and scientific assumptions are those of 40 years ago, not simply obsolete but fallacious and counterproductive in today's context.

Under the former General Plan, outside corporations were allowed to devastate our forest lands for decades, creating a 40-year "timber gap" until they achieve their former productivity – if they are allowed to recover. This is the direct result of the decision of county supervisors to reject special forest practice rules in the 1990s. As a result, the salmon fishery has been decimated as spawning streams were allowed to silt up.

Residential and commercial development has been allowed to proliferate with little or no regard for the General Plan under innumerable special interest variances and amendments or with no permits whatever, cutting off the possibility of future use of such lands under sound planning principles.

Traditional land use patterns supporting mechanized, chemical dependant and livestock rearing emphasize large holdings, many of which are fallow. However, our survival in a Post Carbon era depends on massive conversion to small scale intensive organic vegetable and grain agriculture that may involve multiple ownerships integrated with residential communities.

Some major air polluters such as Masonite and Georgia Pacific have gone, while smaller sources of emissions such as two stroke motors, off-road vehicles, motor boats and racing engines have metastasized without regulation.

If the proposed GPU is approved, it is likely Mendocino County will be laid waste for the next 20 years as it has for the last 40, with even more devastating consequences to the public interest, environmental sustainability, economic viability and social welfare.

The Mendocino County General Plan must be founded on our historical experience, as well as an objective, unbiased, scientifically sound assessment of all relevant land use facts, including population growth, planned and unplanned development, resource depletion, and decayed decrepit infrastructure.

Fundamentally, the GP must take into account the approaching crises known as Global Climate Imbalance and Peak Oil.

### **Specific Objection: NO DISTINCT OPEN SPACE ELEMENT**

The Updated General Plan has no discrete or distinct Open Space Element designated as such as required by Government Code §65302(e) and Article 10.5 commencing with 65560.

Consequently, there is no Open Space Plan in the meaning of §65563. In addition, the County has been issuing building permits and approving subdivision maps without an Open Space Plan in apparent violation of §65567.

In addition, the Natural Resources Conservation Service has not issued maps of soils and farmland ranked as to Prime, Unique, of Local nor of Statewide Importance as required by §65563. The state department of Conservation has not listed such farmlands for Mendocino County. The Board of Supervisors has not adopted a definition of Farmland of Local Importance.

State policy is to protect farmland from conversion to urban and residential uses without certain findings and to monitor encroachment using the Important Farmland Series Maps. Without such maps, Farmland important to the state may have been converted to other uses in Mendocino County. Without a definition of Farmland of Local Importance, locally important farmland may have been converted.

Without a Local Open Space Plan or a distinct Open Space Element in the General Plan, it is likely that such Important Farmlands will be converted irrevocably to non-agricultural uses.

### **Recommendation:**

The current proposed GP Update must be rejected, and a new document written by a process not driven by consultants but instead relies on ad hoc citizen advisory committees to be appointed by supervisors. These committees and the Planning Team would regularly report to a special committee of the BOS to assure timely progress.

The current “financial crisis” actually provides a temporary respite from development pressures in order to accomplish this task. A realistic timeline for the presentation of a Draft General Plan for Mendocino County would be April of 2010.

### **Verification:**

I am the author of this letter and I have personal knowledge of the facts alleged therein, and swear and affirm under penalty of perjury of the laws of the state of California that all statements within it are true, except to those that are alleged to the best of my knowledge and belief, and those I believe to be true.

Signed, \_\_\_\_\_  
RICHARD W. JOHNSON,

Date: November 18, 2008