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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: PRECAUTIONARY PRINCIPLE

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 21st 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: THE GP DOES NOT UTILIZE THE PRECAUTIONARY PRINCIPLE

MENDOCINO COUNTY POLICY #43 PRECAUTIONARY PRINCIPLE
POLICY ADOPTED: June 2006

Where threats of serious or irreversible damage to people or nature exist, lack of full scientific certainty about cause and effect shall not be viewed as sufficient reason for the County to postpone cost effective measures to prevent the degradation of the environment or protect the health of its residents. Any gaps in scientific data uncovered by the examination of alternatives will provide a guidepost for future research, but will not prevent protective action from being taken by the County.

As new scientific data become available, the County will review its decisions and make adjustments when warranted. Where there are reasonable grounds for concern, the precautionary approach to decision-making is meant to help reduce harm by triggering a process to select the least potential threat. The essential elements of the Precautionary Principle approach to decision-making include:

Anticipatory Action: There is a duty to take anticipatory action to prevent harm. Government, business, and community groups, as well as the general public, share this responsibility.

2. **Right to Know:** The community has a right to know complete and accurate information on potential human health and environmental impacts associated with the selection of products, services, operations or plans. The burden to supply this information lies with the proponent, not with the general public.

3. **Alternatives Assessment:** An obligation exists to examine a full range of alternatives and select the alternative with the least potential impact on human health and the environment, including the alternative of doing nothing.

4. **Full Cost Accounting:** When evaluating potential alternatives, there is a duty to consider all the reasonably foreseeable short and long-term costs and benefits to public as well as private sectors of the community, even if such costs are not reflected in the price. Some of these costs and benefits may include raw materials, manufacturing, transportation, use, cleanup, eventual disposal, labor, energy, health, safety, and job-creation.

5. **Participatory Decision-Making Process:** Decisions applying the Precautionary Principle must be transparent, participatory, and informed by the best available information. The County will make a reasonable effort to include the public in an appropriate manner when making decisions that may affect the environment, health, and quality of life.

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,
2008

Date: November 18,