

Richard W. Johnson  
P.O. Box 533  
Talmage, CA 95481  
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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: INTENSIVE AGRICULTURE

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 written in 1971. 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, creating a 40-year "timber gap" before 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 PROVIDE FOR SMALL OR COMMUNITY AG ZONING OVERLAY**

Policy 1d in the 1981 General Plan,: Provide for zoning that will permit establishment of small-sized, specialized, intensive farming operations that can take advantage of regional and local markets such as the Comptche Community Farms application that was denied by the Planning Commission in 1990 because it was called a “commune.” This policy is not included in the updated General Plan. The Planning Commission and the Board of Supervisors discussed the inclusion of this policy and decided to eliminate it.

**The Energy Working Group Report recommended Appendix B, p. 25 et seq. Agricultural Enhancement** discusses the provisions for “Intentional Farming Communities” (IFCs). IFCs would allow several farmers to combine their efforts onto a single piece of land to best share resources and knowledge.

- a. Mendocino County shall grant special status and recognition to those farms and operations that practice human-scaled organic agriculture if they are willing to meet specified land use and operational standards
- b. While not allowing the creation of new small scaled parcels for these types of operations, allow and encourage existing single-owner human scaled agricultural operations on RR or non-conforming sized RMR, RL, or AG zones to gain full protection under the proposed Combining District
- c. c. Remove legal barriers to group or collective land ownership and cultivation practices on larger parcels to prevent pressure to create new parcels.
- d. d. Encourage and facilitate the long term viability and protection of human scaled sustainable agricultural operations of any size (that meets the standards below) via Williamson Act protection and/or securing of Land Trust Protection`
- e. Work with other agencies to develop an appropriate regulatory structure that understands the unique needs of these types of operations. f. Encourage the development of a comprehensive sustainable food network that builds on this type of agriculture by working with the county’s economic development arm to help create the conditions needed for the related agricultural-support jobs to develop.

### **II. Creation of a new Combining District (overlay) that will grant the interested farming operator/cooperative in any of the county’s zoning classifications new rights:**

- a. Recognition that a group with two or more co-owners or operators could own a single parcel and functionally allocate farming area assignments to each of the members without implying the creation of new parcels.
- b. Permission to construct multiple housing units for unrelated farming households, the exact number specified by the property’s filed Production Plan
- c. Permission to construct multi-family or co-housing structures, the exact unit count being specified by the site’s Production Plan.
- d. Permission to construct or place a dormitory structure, strictly for apprentice and trainee use (if desired). The number of beds would be equivalent to the number of farming allotments in the Production Plan. This structure may be permanent or temporary.
- e. Permission to utilize alternative and experimental building techniques for onsite construction (with a provision that a conventional practice would be substituted if the technology failed to perform as intended)
- f. The right to ask for Williamson Act status, regardless of the base zoning, if farmed in a human-scaled manner
- g. The right to secure an agricultural easement or put the land into permanent trust

status. h. For non-AG parcels in this overlay, property tax equivalency to AG, provided human-scale agriculture is shown to be practiced.

**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