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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: ENERGY WORKING GROUP
REPORT

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 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 INCORPORATE MOST OF THE EWG POLICIES

Last year, the Planning Team in response to a memo from former director Phil Gorney downgraded and eviscerated most of the document called Common Sense, a comprehensive set of recommendations meant to be the Energy Element of the General Plan. There is no Energy Element in the proposed updated General Plan.

Precautionary Principle and greenhouse gas reduction goals adopted by the Board of Supervisors as a guide in all planning decisions.

- Require commercial developments and major renovations to be based on the Green Building Council standards, to reach or exceed a specific LEED score³.

- Support the creation and continued existence of an independent energy authority to guide and assist municipal, county, private and commercial interests.⁶
- Implement a county-wide carbon tax to promote energy and emissions awareness while providing funds to finance programs to shift us towards a reduced or carbon-neutral county.

- The county should ensure mass transit is available to its employees and encourage its use, serving as an example to the rest of the population (a substantial percentage of county workers working in Ukiah live in Brooktrails).
- Encourage the development of a rail-based commuter system to augment MTA's bus service along the highway 101 and 20W corridors.⁷
- 2-2e: [new] By 2010 only use economic development dollars to attract industries that are primarily involved with regional renewable resources.
- County funds should only be used to attract companies that use or manufacture clean renewable energy.

- Mandate tree-lined streets in new (and existing) residential and commercial developments. Encourage 'green roofs' where applicable.⁸
- 7 • All land use classifications will include a requirement that a minimum of 25% of the estimated energy usage will be provided by onsite renewable energy. Phase this in stages as follows:

- For all developer-created developments, for each residential unit, a requirement that 400 square feet of garden space is set aside with access to enough water for growing fruit and vegetables. Encourage this as green buffers or commons. Implemented by 2008. 3-1-1 through 13 (All):

- By 2008 all land use classifications will include a requirement that a water supply plan is approved for all new developments that assures that stream flows and water table levels will not be negatively impacted by the needs of the development

- By 2008 all land use classifications will include a requirement that new housing developments will provide safe and reasonable pedestrian and/or bicycle access to schools, services and employment.
- Reduce the minimum agricultural parcel size to 5 acres on the valley floors, 20 acres in the hills to encourage small scale farming, supporting local food production. This should be augmented by (or be adjunct to) greenbelt considerations to prevent islanding of agricultural lands.⁹ Agricultural land *cannot* be taken out of that designation unless replaced by comparable land elsewhere (i.e. protect all agricultural lands regardless of parcel size).
- Integrate suburban and urban land use patterns to create walkable mixed use communities that are defined by agricultural, timber and open space 'greenbelts.'
- Promote and encourage cottage scale industry for the production of essential products produced from in-county resources for in-county markets

- Mandate reflectors on lights and effect a policy governing the percentage of stray light emitted away from the ground by a light installation, commercial, public or private

- As municipal and county buildings are renovated, solar and other renewable energy generation facilities will be incorporated directly into the building.

- As county and municipal waste treatment facilities are renovated (e.g. sewage,

landfill), methane capture will be obligatory, with its primary use in offsetting the facility's energy costs.

- Initiate the upgrade of critical services, including water treatment facilities, to employ on-site renewable energy systems to provide rudimentary operation in times of crisis.

- Retrofit all county schools with stand alone renewable energy systems to support essential loads (i.e. water pumping, food storage... etc.) so they can serve as long-term emergency shelters.

- Create an enforceable timetable for transitioning the county's transportation system to be fueled by non-polluting renewable energy (i.e. electric vehicles charged from solar, wind, etc.).

- Support the designation of Neighborhood Electric Vehicle (NEV) routes to reduce conventional fossil fuel vehicle in communities. 12 3-16c: [replacement text] Freeway construction encourages continued reliance on cars as the primary mode of transportation and is not compatible with sustainability and conservation of resources.

- All land divisions and other discretionary projects shall provide for pedestrian and bicycle routes along public roadways. And all new developments must ensure that there is safe bicycle and pedestrian access to schools and services. ·

- The county should ensure mass transit is available to its employees and encourage its use, serving as an example to the rest of the population (a substantial percentage of county workers working in Ukiah live in Brooktrails).

- Support the re-opening of the rail lines for heavy freight transportation through this county. 3-19d: [new] Encourage the Mendocino Transit Authority (MTA) to negotiate access rights and use of existing rail corridors for fast, energy-efficient, rail-based commuter transit (highway 101 and 20). 3-19d: [new] Adopt a plan to secure right-of-way for a rail-based transit system on the coastal corridor (along Hwy 1).

- Support and encourage the creation of a community choice aggregation (CCA) or a community-owned utility at the county level. This would enable the county citizenry to purchase utilities at a block rate and specify the energy mix they desired (i.e. the percentage of renewable energy).15 ·

- On-site recycling facilities will be developed such that viable building materials and similar items are removed from the waste stream and made available for public purchase at a nominal cost.16 3-25d: [new As landfill facilities are renovated methane capture will be obligatory, with its primary use in offsetting the facility's (and county's) energy costs.

- The development of a new in-county landfill facility will be considered a priority. The landfill will reduce county resident's solid waste costs (through reduced

- The passage of AB 32 adds a whole new category of pollutants to California's air quality laws and calls for dramatic reductions in greenhouse gas (GHG) emissions. Meeting the targets set by the state and the climate change resolution passed by the Board of Supervisors will require a whole new set of policies that do not yet appear in the general plan. Because internal combustion vehicles are responsible for nearly 60% of all CO2 emissions in the county the 3 bullets already included in 4-2g could be re-stated after policy updates (with respect to AB32). Additional policies addressing the GHG emissions from Power Generation, Land Fills, Agriculture and Industry should also be included. 4-2k: [new] Adopt a plan and timeline to eliminate emissions from the transportation sector by replacing internal combustion vehicles with zero emission vehicles (ZEV) to maintain county compliance with AB 32.

- Implement a county motor pool Zero Emissions Vehicle (ZEV) buy-in program · As new developments are approved, ensure electric vehicle charging stations are in place. · Focus new development within and around community areas to reduce vehicle travel. · Implement transit-and pedestrian –oriented land use and site design strategies. · Encourage the use of alternative fuels, energy sources and advanced technology.

- Adopt a plan and timeline for transitioning from fossil fueled power generation to distributed renewable generation to reduce GreenHouse Gas (GHG) emissions.

- Improve building efficiency standards to reduce need for heating fuels.
- Capture or mitigate GHG emissions from landfills and sewage treatment facilities.
- Capture or mitigate GHG emissions from farm, ranch, and vineyard operations.
 - Capture or mitigate GHG emissions from industrial sources while encouraging co-generation (recycling of waste heat, etc.). 15
 - By 2010 insure that all cities in the county qualify for the U.S. Department of Energy's Clean Cities program and seek out federal, state and local grant funds to assist county fleet operators in the purchase of zero emission vehicles and needed infrastructure
 - Inventory and map solar, wind, and tidal energy resources. · Encourage investment in identified renewable resources, either through tax breaks and similar incentives normally offered commercial developers; and/or under the community-owned utility program¹⁷. · Use the California Solar Rights Act to ensure that new building projects do not disrupt solar access.
 - Review all laws that restrict the placement of local distributed energy generating devices such as: wind turbines, solar arrays, wave energy devices, etc.; and eliminate those restrictions that are based on *aesthetic* preference.
 - Ensure the Assessor's Office follows California Tax Code, section 73 that *excludes solar energy systems in property tax calculations*. This exemption should be properly interpreted to *include the supporting structure and inverter/battery enclosure*, as long as it is not part of a structure used for living or business.
 - Create an ordinance to protect renewable installations (solar, wind, etc.) from vandalism and/or theft (regardless of government, commercial or private ownership).^{18 4-}
 - · Make use of passive solar design a requirement in all new building projects. · Encourage the use of bio-mass and landfill gas for projects that can take advantage of the co-generation of heat and electricity.
 - All new development projects will require a minimum of 25% of the estimated energy usage to be provided by onsite renewable energy. Phase this in stages as follows: Electricity 2008 Heating and cooling 2009 Transportation 2010
 - Reduce the minimum agricultural parcel size to 5 acres on the valley floors, 20 acres in the hills to encourage small scale farming, supporting local food production. This should be augmented by (or be adjunct to) greenbelt considerations to prevent islanding of agricultural lands. · Encourage, with appropriate agricultural commitments, multiple workers (and their families) living on and working the same property. In cases where more than one dwelling is requested and permitted, restrict such to clustered commons to preserve the primary focus of agricultural activity.
 - For all new developments; for each residential unit, a requirement that 400 square feet of garden space is set aside with access to enough water for growing fruit and vegetables.

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