



FARM BUREAU SAN DIEGO COUNTY

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July 28, 2014

Marl Slovick
County of San Diego Department of Planning & Development Services
5510 Overland Ave., Suite 310
San Diego, CA 92123

Re: DREIR for Lilac Hills

Dear Mr. Slovick:

Thank you for this opportunity to comment on the Draft Revised Environmental Impact Report for the Proposed Lola Hills Ranch Master Planned Community (DREIR). San Diego County Farm Bureau represents farmers throughout San Diego County with the mission to represent San Diego agriculture through public relations, education, and public policy advocacy in order to promote the economic viability of agriculture balanced with appropriate management of natural resources.

Our first comment is that we believe the County of San Diego's agricultural policies should be front and center to in the discussion and analysis in regards to the project. In particular, attention should be paid to the policy under COS 6.2 that states:

Discourage development that is potentially incompatible with intensive agricultural uses includes schools and civic buildings where the public gather, daycare facilities under private institutional use, private institutional uses (e.g., private hospitals or rest homes), residential densities higher than two dwelling units per acre, and offices and retail commercial.

Our chief concern is for the continuing and unobstructed operation of current and future farming enterprises immediately adjacent to and in the vicinity of the proposed project.

By virtue that all of the uses mentioned in the policy above are proposed for placement in the project and that mitigation is proposed in consideration of adjacent agricultural uses, it must be assumed that the uses are, in fact, "potentially incompatible" and by county policy should be discouraged. We believe the DREIR should specifically address this point and include a discussion on the County's consideration to set aside the policy statement.

In addressing COS 6.2 the DREIR on page 118 relies heavily on disclosure statements given to new residents and an education program for new residents on the role agriculture plays in the area. Over time we believe such a program will deteriorate. Most important to note is that no manner of

noticing or education can keep any individual resident of the new community from filing complaints that result from essential agricultural practices that can create noise, odors, early morning and late evening operations, or dust. We believe the statement that CC&Rs will limit new residents' ability to lodge complaints against farmers is a misstatement and should be struck and replaced with acknowledgement that there is no manner to prevent a citizen from exercising his or her right to file a complaint.

In Section 3.2.2 it states "The pressure from adjoining neighbors' complaints related to legal farming activities may heighten the attractiveness of selling the farm for development." This shows that even within the DREIR there is acknowledgement that complaints without merit should be expected when incompatible uses are placed side by side.

Agricultural buffers are included as a mitigation measure along specific boundaries of the project. Our concern is that the buffers are intended to be maintained by the HOA. We have two concerns. First, the HOA will soon learn that their linear buffers are difficult and expensive to manage as compared to commercial farms. Because of this a real possibility exists that the agricultural buffer will not be maintained in a commercially clean manner. That leads to our second concern, which would be the existence of ignored trees acting as a pathway for diseases and insect pests entering into adjacent farms. This has never been as dramatic a concern as it is today with Asian citrus psyllid (ACP) threatening the county's citrus producers. It has been shown that the movement of ACP into commercial groves was initiated by infestations in residential neighborhoods. Future infestation of other exotic pests and diseases are certain.

We believe the DREIR is lacking in consideration of the threat posed by residential uses and the accompanying fruit trees, whether in buffers or backyards, upon farms in the entire area.

Among the mitigation measures are the call for 50 foot buffers and a six-foot fence along stretches of the proposed project boundary and adjacent farms. We believe those are woefully inadequate. Even in the stretches where a 100 foot LBZ is proposed, residential activities could take place right up to the barrier fence. We believe the development should be pushed further inward from the adjacent farmlands. This comment extends to the potential farmlands adjacent to or near the proposed development.

Our final comment is on the DREIR's lack of an analysis on the impacts to rural agriculture when an intense urban use is placed in its midst. The DREIR focus on farm impacts outside the project look only at the farm operations directly adjacent to the proposed project. Our concern is for those farmers in the vicinity of the proposed project who wish to continue farming without the burden of urban/rural conflicts and intrusions onto their farms. It is our opinion that the size of the proposed project requires a more robust analysis of the impacts to farmers not only adjacent to the proposed project, but even those throughout the community who may be affected.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Larson", written in a cursive style.

Eric Larson
Executive Director