LETTER

RESPONSE

Letter B3

WESTERN CACTUS ENTERPRISES, INC.
9751 WEST LILAC ROAD
VALLEY CENTER, CA 92082

Date: July 23, 2014

DPLU Director Mark Wardlaw
DPLU Project Manager Mr. Mark Slovick
County of San Diego Department of Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Ref: Comments on Accretive/Lilac Hills Ranch Revised Draft Environmental Impact Report (RDEIR)

Dear Director Wardlaw and Project Manager Slovick:

We submitted the comments in a letter dated August 18th, 2013 regarding the DEIR for the proposed Lilac Hills Ranch project.
The revised draft environmental impact report (RDEIR), did not address our issues. Please respond to our comments.

B3-1

B3-1 Responses to the commenter's August 18, 2013 letter are attached.

The following items are also attached.

1. Comment letter on Accretive/Lilac Hills Ranch Revised Draft Environmental Impact Report (RDEIR).
2. Agricultural Survey Map Large Color.jpg
3. Word version of ag locations.docx
4. CITES Western Cactus.pdf
    - pages 1-4: List of Species Approved for Export for Western Cactus
    - pages 5-6: Sample State Phytosanitary Certificate
    - pages 7-8: Sample Federal Phytosanitary Certificate
    - pages 9-11: Sample CITES Certificate

B3-2

B3-2 This comment is an introduction to comments that follow. No further response is required.

Please confirm receipt of this e-mail and attachments.

Thank you,

Hans Britsch

Thomas Hans Britsch
Western Cactus Enterprises, Inc.
thomas@westerncactus.com
760-535-4312

WESTERN CACTUS ENTERPRISES, INC.

9751 WEST LILAC ROAD

VALLEY CENTER, CA 92082

Date: August 19, 2013

DPLU Director Mark Wardlaw
DPLU Project Manager Mr. Mark Slovick
County of San Diego Department of Planning and Land Use
5201 Ruffin Rd. Ste B
San Diego, CA 92123

Ref: Comments on Accretive/Lilac Hills Ranch Draft Environmental Impact Report (DEIR)

Dear Director Wardlaw and Project Manager Slovick:

The Accretive/Lilac Hills project is a textbook example of leapfrog development. The County recently completed its General Plan, which took 12 years and over 20 million dollars to complete. The General Plan designates the West Lilac triangle area as rural. According to the GP, this 608 acre area only permits 110 single family dwelling units. Instead Accretive now proposes 1,746 homes and 5,000 people with densities as high as 20+ dwelling units per acre. Placing such high density development in a designated rural area is incompatible and will cause enormous disruptions to this agricultural area. The result will be the destruction to yet another prosperous job producing agricultural area.

Ultimately it comes down to a simple choice. Does the county want to keep this area as a thriving agricultural area or does the county want to convert this area to a high density urban area far away from most available jobs and resources? The County must decide one way or another, the two can not coexist.

The following comments focus on Agricultural impacts to the area known as the West Lilac Triangle and surrounding area as well as impacts specifically to Western Cactus Enterprises, Inc.

B3-3

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B3-3 This comment is an introduction to comments that follow. No further response is required.

The DEIR uses the LARA model to derive unsubstantiated conclusions:

Throughout the DEIR's Agricultural Resources Report, the LARA model is used to determine that the site and surrounding areas are not considered important agricultural resources and therefore the impacts are less than significant. The LARA model takes into account three factors; water climate and soil quality. According to the Ag resources report for the project, climate and water are rated high while soil quality is rated low. If 1 of the 3 factors are classified as low, then according to the LARA model, the site is not considered an important agricultural resource. In general, the soils in San Diego County are considered poor. Only 6% of the County's soils are considered prime agricultural land. That being the case, according to the LARA model, only 6% or less of the County's land is considered an important agricultural resource. San Diego County is ranked among the top 10 agricultural counties in the state in terms of agricultural value. Nationally, it has the 12th largest agricultural economy. San Diego agribusiness produces the highest dollar value per acre ($5,612/acre) of any county in California (2002 census of Agriculture). The list of agriculture accolades could go on for pages. Statistics alone, support the fact that San Diego County should classify more than 6% of its land as an important agricultural resources. Therefore, it's obvious that the LARA model is inappropriate for San Diego County. B3-4

There is no "ground truthing" with the LARA model. During the 12 years of the general plan update, there was 12 years of "ground truthing". The general plan designated the project area and the surrounding area as an agricultural area. The LARA model was not used to designate agricultural areas during the general plan update. If it had, there would be virtually no agricultural areas (6% or less) for San Diego County. If "ground truthing" is used to evaluate this area, it is obvious that the Lilac Triangle is a significant and prosperous agricultural area (see attachments: Agricultural Survey Map Large Color.jpg & Word version of ag locations.docx) B3-5

Furthermore, the LARA model has never been formally adopted by San Diego County. It is therefore inappropriate to rely on this model, or any model exclusively. The DEIR repeats the results of the LARA model (For example: pursuant to the LARA model, the project site is not a significant agricultural resource) throughout the document to derive unsubstantiated conclusions. B3-6

B3-4 The commenter provides factual information about San Diego County agricultural statistics and opinions about using the LARA Model to determine whether farmland is considered important farmland (adopted March 19th, 2007). Since this letter was written during the public review of the June 2013 Draft EIR, it addresses the prior LARA Model results. Since the 2013 circulation of the EIR, the LARA Model was updated and the FEIR has been revised to reflect the conclusion that the site is an important agricultural resource. Specifically, the LARA Model soil quality rating is considered moderate, which results in the determination that the site is an important agricultural resource. As a result, the FEIR now identifies a significant impact to 43.8 acres of Prime Farmland and Farmland of Statewide Importance soil candidates which would be mitigated through the purchase of agricultural conservation easements as detailed in M-AG-1. For additional details on the direct agricultural impacts of the project and recommended mitigation measures, see Global Response: Agricultural Resources, Direct Impacts.

In addition, the commenter makes an incorrect statement about the LARA Model. The commenter makes reference to the fact that only 6% or less of the County's soils are considered prime agricultural land and goes on to assert that only 6% of the County would be considered an important agricultural resource under the LARA Model. "Prime Agricultural Land" is defined within Government Code §51201(c) as soils having a Land Capability Classification (LCC) of I or II or a Storie Index (SI) of 80 or higher. It is true that there is less than 6% of "Prime Agricultural Land" in the County based on this definition. However, the LARA Model does not rely on this soil quality definition. As a result, the LARA Model would not result in only 6% of the County being considered an important agricultural resource. The LARA Model soil quality rating expands the consideration of quality soils by relying on the soil criteria published by the Natural Resources Conservation Service, which identifies soils that would qualify for the Prime Farmland or Farmland of Statewide Importance mapping categories. These soil lists are unique to each County and account for local soil conditions. As described in the County's Agricultural Resources Guidelines for Determining Significance, "These soil criteria include a much broader range of soils than the Prime Agricultural Land definition in Government Code §51201(c), with 70% of the soils that meet the Prime and Statewide Importance Farmland soil criteria having a LCC greater than II and 88% have SI ratings below 80" (page 5). Contrary

B3-4 (cont.)

to the statements by the commenter, the LARA Model would not limit the identification of important agricultural resources to only 6 percent of the County. The LARA Model includes a more inclusive soil quality rating that takes into account locally important soils and is based on the NRCS published lists of soils that qualify for the Prime Farmland or Farmland Statewide Importance mapping categories.

B3-5 Refer to response to comment B3-4 above. This comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

The County is aware of the agricultural lands surrounding the project site and has visited the project site and surrounding properties. In addition to County PDS staff, during the Lilac Hills Ranch Plan Amendment Application (PAA) process, the Planning Commission held two public meetings at the project site. However, the LARA Model measures the CEQA significance of agricultural lands and takes into account the project site's climate, soils resources and water resources, as required factors. It further addresses topography, surrounding land uses and land use consistency, when evaluating agricultural resources.

Regarding the second part of this comment, it is acknowledged that the GPU was not based on the LARA Model and the Lilac Triangle is an economically viable agricultural area. However, the LARA Model was not intended to be used as a planning tool. Instead, the LARA Model is used as an objective means of evaluating a project against the CEQA thresholds identified in the County's Guidelines for Determining Significance to Agricultural Resources (Guidelines). It should be noted that for the FEIR, the LARA Model conclusions took a conservative approach and conclude that the project site is a significant agricultural resource.

B3-6 The use of the LARA Model and the County's Guidelines are based on the CEQA Appendix G thresholds and were reviewed and evaluated by a panel with expert knowledge in the subject area. The panel of experts included representatives from the County Department of Agriculture, Weights and Measures and from the San Diego County Farm Bureau. The Guidelines were approved by Planning & Development Services on March 19th, 2007 and have been available to the public on the department's webpage, since 2007.

Impacts to Agriculture in the area:

Allowing this project will modifying the character of the area. This is a fully functioning agricultural area. Placing this project in the middle of the Lilac Triangle will cause significant conversion and will eventually destroy this agricultural area.

Historically agriculture and high density uses do not mix well. There are continual problems when trying to ensure compatibility of high density uses with existing and future adjacent agricultural operations. The general plan says that it will protect agriculture. The Agricultural resource statement states that it will: "Minimize land use conflicts, preserve agricultural resources, and support long term presence and viability of the agriculture industry as an important component of the region's economy and open space linkage." The newly adopted General Plan identifies this area as 4 acre; 10 acre and 20 acre parcels. It did not identify this area for high density uses. The new General Plan identified numerous areas to place high density and that is where it should be placed. At one time, Encinitas was the flower capital of the world. It is one of the best places to grow flowers due to its climate. There are no flower growers left due to the fact that the land became too expensive to farm and due to the incompatibility of Ag and high density. Agriculture doesn't have a chance against the profits of high density. Growers have had to move inland. However, they can only move so far before the benefits of the weather are no longer available. The further east you go the less mild the climate gets: the hot and cold extremes limit what can be grown. Therefore it is crucial to protect the areas that are left. The West Lilac Triangle is such an area. The mild climate allows a multitude of crops to be grown.

Allowing for high density in this area will increase the property values and create conflicts between growers and residents to a point where the growers eventually be non-existent in the area. One of our neighbors is a flower grower that is directly adjacent to the project. He does use aerial spraying. If this project is approved there will be a high incentive for him to sell. The value of his land will increase dramatically. The math is simple: 1 home per 4 acres verses 4 homes per acre (or more)….Ag can't compete. Furthermore, if the flower grower wanted to sell to another grower, no grower wants to deal with all of the problems that come with running an operation so close to high density. When the flower grower sells then the development will be adjacent to my property. The domino effect continues and the Ag in the area will be choked out. (use the word "continues" because it has already started: Ag operations have already made deals with Accretive and are within the project area).

B3-7

B3-7 The commenter's opinion and information about agriculture in the project area is acknowledged. The FEIR recognizes that the project could result in a significant impact related to the indirect conversion of agricultural land resulting from land use conflicts. As a result, the project incorporates mitigation measures to increase compatibility between the project and off-site agricultural operations. Refer to Global Response: Agricultural Resources, Indirect Impacts for details about the project's potential indirect impacts and proposed mitigation measures that would reduce impacts to less than significant.

The commenter provides an opinion and general information about conflicts between agricultural operations and the nearby residential development and indicates that the "domino" effect would result in more agricultural conversion. The comment assumes that if the project is approved, adjacent property owners will have the right to subdivide at higher densities, which is incorrect. The General Plan Designations and allowable densities on land surrounding the project site would not change. Any proposal to develop property in the surrounding area at increased densities would require discretionary approval and a General Plan Amendment. The issues raised by the commenter are disclosed as potentially significant impacts in FEIR subchapter 2.4.2.3 and Section 3.2 of the Agricultural Resources Report (Appendix H) of the FEIR.

The flower grower located adjacent to the commenter's operation and adjacent to the project site, as mentioned in the comment, corresponds with the area evaluated in the FEIR Agricultural Resources Technical Report as Agricultural Adjacency Area 7. Refer to Figure 2.4-7e of the FEIR, subchapter 4. The FEIR provides specific analysis addressing the potential conflicts between this offsite operation and the proposed project and identified a potentially significant impact associated with land use conflicts. To address this potential conflict, the project incorporates M-AG-2, which provides a 50 foot buffer comprised of two rows of orchard trees along the project boundary adjacent to agricultural operations. In addition, where existing fencing is not already present, the project would construct new fencing at the project boundary (M-AG-3). In addition to fencing and the agricultural buffer, the off-site agricultural operations at this location are separated from onsite land uses along the western boundary by a 50-foot limited building zone and an internal roadway.

Specific Impacts to the Agricultural operation of Western Cactus

We are an international supplier of rare and endangered cactus and other succulent species. We have a heavy export schedule to our wholesale customers. Countries to which we ship and have shipped include Canada, Mexico, Denmark, Netherlands, Scotland, England, France, Germany, Switzerland, Austria, Spain, Italy, Malta, China, Taiwan, South Korea, Japan, Thailand, Malaysia, Australia, New Zealand and Saudi Arabia.

We are subject to export controls under CITES, the Convention on International Trade in Endangered Species. 5,000 species of animals and 28,000 species of rare and endangered plants are protected from exploitation by controls on import, export and re-export.

175 countries are ratified members of CITES, with Bosnia and Herzogovina the newest. Since CITES came in force (1975) only one species protected by the Convention has become extinct in the wild as a result of trade, the Spix's Macaw.

CITES protects species in the wild from commercial "collectors" (poachers and smugglers) who will often take *all* rare specimens they find, leaving no native breeding stock.

Both danger and profits were great for smugglers.

For the plants and animals, there was only danger.

Often, they did not survive capture, uprooting and transport, and would be sold on the clandestine market to commercial interests that were incapable of nurturing the stressed, weakened plants and animals, or providing habitat for them to thrive.

Seed collectors are just as destructive. Seeds are easier to hide and smuggle. Often smugglers strip entire habitats of rare seeds, leaving no means for the colony to reproduce.

Attached are CITES certificates, which we prepare for every export shipment. In conformance with CITES, permits are issued by the Division of Management Authority, U.S. Fish and Wildlife Service, Department of the Interior, under the authority of the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq).

Every export shipment is certified first by a State and then a Federal inspector.

We produce and sell over 400 species of plants. We are required to report all varieties that are protected by CITES (see attachment: CITES Western Cactus.pdf pages 1-11). Our approved list has over 28O species from the following plant families: Agaveceae; Apocynaceae; Cactaceae; Euphorbiaceae; Fouqieriaceae; Lilliaceae.

B3-8

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B3-7 (cont.)

The project also requires that notices to property owners be included with sales documentation when homes are sold within the development. The notice explains that agricultural operations exist in the area, that future residents could experience nuisances such as dust and odors, and that agricultural operators have rights to continue agricultural production using customary agricultural practices.

B3-8 The commenter provides information about the growing and supply of rare and endangered cactus and other succulent species. The comment also describes the Convention on International Trade in Endangered Species (CITES) export requirements the Western Cactus Enterprises, Inc.. The County acknowledges the efforts expressed by the commenter to sustain the agricultural operation; however, the County does not agree that the proposed project would "choke [the] operation out of existence" as stated by the commenter. Please refer to response to comment B3-7 above and the Global Response: Agricultural Resources, Indirect Impacts. The comment concludes that night illumination from the proposed development would disrupt the ability to propagate plants. This issue is addressed in the following response.

The plants listed on our CITES are classified as Appendix II.

Appendix I plants are considered the most endangered of the CITES listed plants. Since these are threatened with total extinction in the wild, CITES prohibits international trade. That is why Aloe susanne, (which is an Appendix I plant), is *not* on our CITES list. While we cannot ship to international customers, we are permitted to sell it domestically. We have been propagating Aloe susanne from seed for over 20 years and have had it available for sale to our customers during this time. My father, Hans Sr., recently took a trip to Madagascar with a group of plant experts/enthusiasts. They were excited to see populations of Aloe susanne back in the wild.

That is our goal: to successfully reproduce, in the US, rare and endangered plants so they are available to US and international collectors. This thwarts illegal poaching of plants and seeds in the wild.

There is a lengthy process to receive approval to add any new variety to our export list. If we want to add new species, we must contact Fish and Wildlife in Washington D.C. and prove to them that we have mother plants.

Only after we prove that we have the ability to reproduce from our own plant stock, will Fish and Wildlife add the plant to our list. Our collection is a result of over 40 years of work and continued effort to maintain our mother plants. This is the reason our inventory of mature in-ground mother plants is so valuable to us.

Getting plants to the flowering stage takes many years. Pollination by bats, bees, night-flying moths and other insects is a significant factor. This decreases dramatically in urban areas, especially due to widespread night lighting. It is another important reason we bought the land on West Lilac: rural agricultural zoning, with little night illumination.

From seed, most cactus take three years to get to a 2" pot size. Once planted in the field some varieties take ***decades*** before they flower and produce seed. The work is precise, our employees are expert at this, and have been with us for many years. It is, literally, a hands-on operation.

It is evident that our operation has a lot at stake. It cannot simply pick up and move to another location. It has taken decades to get this location into production and it is impossible to find a location with the same climatic qualities.

The night illumination from the development will disrupt our ability to propagate endangered species. Having this high density so close will reduce both the night and day time pollinators. It will also affect how we can treat plants for disease and/or fungus if spraying is required (impacts to the ability to use pesticides and fumigants).

B3-8 cont.

Three generations of the Britsch Family have come before you previously asking that you remove road 3A and not let it cut through and destroy our business. The Board of Supervisors unanimously voted to remove the road and we again thank them for their vision to protect agriculture. Similarly, allowing this high density in such proximity to us will choke our operation out of existence.

The simple question is, does the county want to mulch twelve years' work on the Update in North County, just to put an urban, commuter community on productive farmland that can never be replaced?

B3-8 cont.

Agricultural Impacts to study not addressed in the EIR:

Below is a list of specific and immediate concerns that will destroy our agricultural business that were not addressed in the DEIR report. While it took a significant amount of time to detail the concerns listed below, you can only imagine how many more years – a half century to be precise– that it took to accumulate all of the mother-stock for the species of plants that are listed below that stand to be destroyed by the Accretive project.

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Pachypodium lameri var, ramosum?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Pachypodium lameri var, ramosum?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Acanthocalycium spiniflorum?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Acanthocalycium spiniflorum?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Astrophytum myrostigma?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Astrophytum myrostigma?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Browningia viridis?

B3-9

B3-9 The comment raises a concern about the potential impacts of nighttime lighting on pollinators and a general concern about effects of the project's increased density on pollinators. The commenter asserts that lighting would adversely impact pollinators, thereby affecting seed production and ultimately, the viability of the farming operation.

First, the project site is approximately one-quarter mile from Western Cactus Enterprises, Inc. In between, the farm and the project is an agricultural operation. Thus, there would be approximately 1,300 feet between the nighttime lighting proposed on-site and the property boundary of Western Cactus Enterprises.

Second, while it is generally accepted that nighttime lighting can attract night pollinators (typically moths and bats), few studies have examined the actual effects of artificial lighting on these pollinators[1]. As the scientific literature does not provide conclusive evidence that nighttime lighting would reduce nighttime pollinator populations or adversely affect their behavior, the FEIR does not identify a potentially significant impact related to this issue.

Although the FEIR does not recognize a significant impact to pollinators from nighttime lighting, the project's lighting would be designed to minimize light pollution. Part III of the Specific Plan, section D.10 provides lighting guidelines, which are also included as a project design consideration in the FEIR, Table 1-3. These lighting guidelines state:

"Project lighting would be designed to provide adequate illumination for safety, security, and architectural accents without over lighting. Light fixtures would direct light to use areas and avoid light intrusion into adjacent land use areas. Light shields would be used where necessary to avoid nuisance lighting, particularly in residential neighborhoods and adjacent to preserved natural open space. Lighting, including all landscape low voltage decorative lighting, would comply with the County's Light Pollution Code."

[1] Rich, Catherine and Longcore, Travis, Eds. Ecological Consequences of Artificial Night Lighting, 2006.

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Browningia viridis?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Cephalocereus senils?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Cephalocereus senilis?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Cereus hildmannianus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Cereus hildmannianus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Cereus validus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Cerus validus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Cleistocactus brookeae?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Cleistocatus brookeae?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Cleistocactus strausii x hyalacanthus.

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Cleistocactus strausii x hyalacanthus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Cleistocactus x Oreocereus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Cleistocactus x Oreocereus?

B3-9 cont.

B3-9 (cont.)

In conclusion, it would be speculative to conclude that the project's lighting would result in significant impacts to pollinators, thereby, preventing seed production. The research on the effects of night lighting on pollinators is not conclusive and there are many other factors and risks associated with pollinator behavior. For example, pollinators (bees, butterflies, moths, beetles, flies, and wasps) can be adversely affected by pesticide use[2], which would be reduced on the project site as a result of the project. Furthermore, the FEIR already includes adequate lighting measures that would minimize light pollution. Project lighting is designed to be "subdued and understated" (Specific Plan, Part III, D.8). As a result of the existing project design measures intended to minimize light pollution in addition to the fact that the actual effects of night lighting pollinators is speculative, the project's lighting would not negatively affect the off-site agricultural operations.

Regarding the potential effects of increased density on pollinators, the available literature does not provide adequate information to support the conclusion that the project would result in an adverse impact to pollinators and, ultimately, to the seed production to the varied species listed throughout the comment. As a result, there is a lack of evidence to support a conclusion that the project could significantly impact pollinators in the immediate vicinity of the project, resulting in an adverse effect to agricultural operations.

[2] Natural Resources Conservation Service. 2014, February. Preventing or Mitigating Potential Negative Impacts of Pesticides on Pollinators Using Integrated Pest Management and Other Conservation Practices, Agronomy Technical Note No. 9

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Coleocephalocerus goebelianus/

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Coleocephanlocereus goebelianus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Copiapoa humilis?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Copiapoa humilis?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Coryphanta delaetiana?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Coryphanta delaetiana?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Discocactus flagelliformis?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Discocatus flagelliformis?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Echinocactus platyacanthus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Echinocactus platyacanthus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Echinocereus dasyacanthus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Echinocereus dasyacanthus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Echinocereus stramineus ssp. Pasacana?

B3-9 cont.

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Echinocereus stramineus ssp. Pasacana?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Echinopsis hybrid?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Echinopsis hybrid?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Echinopsis leucantha?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Echinopsis leucantha?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Echinopsis pachanoi?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Echinopsis pachanoi?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Eriosyce kunzei?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Eriosyce kunuzei?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Eriosyce subgibbosa?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Eriosyce subgibbosa?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Escobaria missouriensis?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Escobaria missouriensis?

B3-9 cont.

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Espostoa lanata?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Espostoa lanata?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Espostoa nana?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Espostoa nana?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Espostoopsis dybowskii?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Espostoopsis dybowskii?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Pachypodium geayii?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Pachypodium geayii?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Pachypodium lealii?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Pachypodium lealii?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Astrophytum capricorne?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Atrophytum capricorne?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Astrophytum ornatum?

B3-9 cont.

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Atrophytum ornatum?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Carnegia gigantean?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Carnegia gigantean?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Cereus aethiops?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Cereus aethiops?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Cereus hybrid "Fairy Castle"?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Cereus hybrid "Fairy Castle"?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Chamaecereus hybrid?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Chamaecereus hybrid?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Cleistocactus strausii?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Cleistocactus strausii?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Cleistocactus winteri?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Cleistocactus winteri?

B3-9 cont.

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Coleocereus aureus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Coleocephalocereus aureus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Coleocephalocereus purpureus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Coleocephalocereus purpureus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Copiapoa tenuissima?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Copiapoa tenuissima?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Denmoza rhodacantha?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Denmoza thodacantha?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Echinocactus grusonii?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Echinocactus grusonii?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Echinocereus adustus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Echinocereus adustus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Echinocereus pectinatus var. rigidussmus?

B3-9 cont.

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Echinocereus pectinatus var. rigidissmus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Echinocereus websterianus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Echinocereus websterianus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Echinopsis bruchii?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Echinopsis bruchii?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Trichocereus hybrid?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Trichocereus hybrid?

B3-9 cont.

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Echinopsis leucantha?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Echinopsis leucantha?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Echinopsis pentlandii?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Echinopsis pentlandii?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Eriosyce kunzei?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Eriosyce kunzei?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Escobaria laredoi?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Escobaria laredoi?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Espostoa blossfeldiorum?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Espostoa blossfeldiorum?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Espostoa melanostele?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Espostoa melanostele?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Espostoa superba?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Eulychnia breviflora?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Eulychnia breviflora?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Facheiroa ulei?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Facheirioa ulei?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus alamosanus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus alamosanus?

B3-9 cont.

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus chrysacanthus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus chrysacanthus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus cylindraceus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus cylindraceus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus emory covillei?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus emory covillei?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus emory rectispinus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus emory rectispinus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus flavovirens?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus flavovirens?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus glaucescens?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus glaucescens?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus gracilis?

B3-9 cont.

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus gracilis?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus gracilis ssp.coloratus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus gracilis ssp.coloratus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus hamatacanthus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus hamatacanthus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus herrerae?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus herrerae?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus histrix?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus histrix?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus latispinus var.flavispinus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus latispinus var.flavispinus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus latispinus var.latispinus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus latispinus var.latispinus?

B3-9 cont.

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus latispinus var.spiralis?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus latispinus var.spiralis?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus macrodiscus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus macrodiscus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus pilosus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus pilosus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus robustus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus robustus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus townsendianus var.santa maria?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus townsendianus var.santa maria?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus townsendianus var.townsendianus?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus townsendianus var.townsendianus?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Ferocactus wislizerii?

B3-9 cont.

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Ferocactus wislizerii?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Gymnocalycium bruchii?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Gymnocalycium bruchii?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Gymnocalycium chiquitanum?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Gymnocalycium chiquitanum?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Gymnocalycium delaetii?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Gymnocalycium delaetii?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Gymnocalycium horstii var. bueneckeri?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Gymnocalycium horstii var. bueneckeri?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Gymnocalycium mihanovichii?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Gymnocalycium mihanovichii?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Gymnocalycium monvillei?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Gymnocalycium monvillei?

B3-9 cont.

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Gymnocalycium pflanzii var. albipulpa?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Gymnocalycium pflanzii var. albipulpa?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Gymnocalycium saglionis?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Gymnocalycium saglionis?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Gymnocalycium schickendantzii?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Gymnocalycium schickendantzii?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Gymnocalycium spegazzinii?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Gymnocalycium spegazzinii?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Haageocereus multangularis?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Haageocereus multangularis ?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Hatiora rosea?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Hatiora rosea?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Helianthocereus terscheckii?

B3-9 cont.

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Helianthocereus terscheckii?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Leuchtenbergia principis ?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of leuchtenbergia principis?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Lobivia hibrid ?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Lobivia hibrid?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Lobivia leucomalla?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Lobivia leucomalla?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Mammillaria albicans ?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Mammillaria albicans ?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Mammillaria albinatana ?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Mammillaria albinatana ?

How will the increased illumination from the accretive project effect the night pollinators and thereby the seed production of Mammillaria baumii?

How will the insertion of the high density accretive project into this agricultural area effect both day and night pollinators in the area and thereby the seed production of Mammillaria baumii ?

B3-9 cont.