

COMMENTS

RESPONSES

Ehsan, Beth

From: Eric Anderson <erictanderson02@yahoo.com>
Sent: Monday, June 15, 2015 4:00 PM
To: Ehsan, Beth
Cc: J. Arsvaud; Horn, Bill
Subject: Valiano DIER Cumulative Agriculture impacts

Dear Beth Ehan

I would recoment that the section of the Cumulative Impact to Farm Sites portion (page 2,3-35), Ref the Anderson TM and TPM. This project results in five 2+ acre parcels on which the established commercial nursery operation will continue. It was not terminated by the TM or TPM nor is it a condition of the Final map, in fact if you examine the TPM the ongoing uses are designed in. Some of the parcels will be sold for family estate reasons but there is nothing to stop agriculture from continuing, infact the the two acre plus sized parcels accomodate this. Something Valiano has an opportunity to do espeically on the soils areas that meet the state defintion and in San Diego are extremely rare. The agriculture onsite opportunities would continue when the projects design two acre parcels minimums. In fact a good example was a previous 4 parcel map finalized by Anderson of the same Biophilia ranch site. All continue to support ongoing commerical agriculture operations. (one of the parcels was out of commercial production over twenty years but now has a lemon grove. Very little of those sites were rated well under the normal county agriculture analysis but with the good climate in Elfin Forest, CWA service for water and the larger parcels show that the traditional county evaluation of agriculture is flawed and that the over 100 acres of agriculture sites in Valiano should contemplate additional acreage in the analysis. Some of the crops on the Anderson nursery site are no longer viable with high water costs and so the operaion will be smaller but continue and there is no telling what the future owners will do. I hope this point is not lost on the land use consultants of Valiano. Eden Valley is a very viable location for ongiong intensive commercial agriculture and equestrian uses.

Respectfully
Eric Anderson

Farmer Elfin Forest (and point person for the Anderson family on the TPM.)

V-1a Thank you for the correction related to the status of agricultural activities associated with the Anderson TM and TPM properties. The referenced text in Subchapter 2.3 and Appendix D of the EIR has been modified accordingly.

V-1b See Responses I-42, I-43, and I-69d for information regarding potential Project alternatives with 2-acre minimum lots.

With respect to the agricultural analysis conducted for the Proposed Project, the current County Agricultural Guidelines entail using the Local Agricultural Resource Assessment (LARA) Model. The LARA Model includes the consideration of water, climate and soil quality factors (required factors), as well as surrounding land uses, land use consistency and topography (complementary factors), to determine if the Project site is an "important agricultural resource". This model, and the associated Agricultural Guidelines, represent the adopted and required methodology for evaluating agricultural resources and impacts in the County. As described in Subsection 2.3.1.3 of the EIR, evaluation of the Project site under the noted Model and Guidelines identified a total of approximately 137.2 acres of agricultural resources within the Proposed Project site, including areas used recently and/or historically for agricultural operations (orchards, row/field crops and apiary sites), as well as portions of applicable "Important Farmland" categories (as determined by the California Department of Conservation [CDC], refer to EIR Subsection 2.3.1.1, and Figures 2.3-3a and 2.3 3b). As described in the noted Agricultural Guidelines (and in Subsection 2.3.2.2 of the EIR), impacts to identified agricultural resources occur where development/disturbance of these areas overlap designated Prime Farmland or Farmland of Statewide Importance candidate soils (as designated by the CDC). As a result, approximately 13.1 acres of significant impacts were identified from development/disturbance associated with the Proposed Project. Specifically, this includes 11.6 acres of historic orchard use in the southeastern portion of the site, 0.2 acre of historic orchard use in the east-central area, and 1.3 acres of historic row/field crop production in the east-central area (with the noted impact locations shown on Figure 2.3-3 of the EIR). Appropriate mitigation to address these impacts is identified in Section 2.3.5 of the EIR, and includes the following options:

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V-1b
cont.

(1) providing 13.1 acres of off-site mitigation through the acquisition of agricultural mitigation credits via the County Purchase of Agricultural Conservation Easement (PACE) Program; (2) providing a combination of PACE mitigation credits and establishment of on and/or off-site agricultural easements in appropriate areas encompassing CDC candidate soils and totaling 13.1 acres, or (3) purchasing off-site agricultural lands with easements totaling 13.1 acres that meet the intent of the County Agricultural Guidelines, all to the satisfaction of the Director of PDS. Based on the described agricultural analysis and requirements under the LARA model and associated County Agricultural Guidelines, the noted conclusions of approximately 137.2 acres of on-site agricultural resources and 13.1 acres of Project-related significant impacts to these resources requiring mitigation are accurate, and the analysis methodology is not considered “flawed” as suggested in this comment.