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Bill Nicholson
Planning and Community Development

Re: Draft EIR for Merced County GPU – **Agriculture Element**

The prevailing deficiency that I can identify is the weak language about mitigating for the loss of productive farmland. Exempting mixed-use projects, in-effect eliminates mitigation for all but a few types of projects. If all you have to do is add a mini-mart to a large residential project to call it "mixed-use" the requirement for mitigation is seriously watered-down. Likewise, highway interchange centers can become very large over time and resemble small towns.

I have in the past suggested a sliding scale for mitigation which would incentivize building on lower grade soils. For example building on "prime" soils would be mitigated at 4:1, "statewide at 3:1", "unique" or "local importance" at 2:1 and grazing at 1:1. Another system to consider is the Land Evaluation and Site Assessment "LESA" system.

I agree that the minimum agricultural parcel size going forward should be 40 acres. This standard has been used by Stanislaus County for many years very successfully. Since there are hundreds and maybe thousands of parcels already in existence in the 20 acre range, there will continue to be a large supply of smaller parcels for those who desire such. For several years, independent appraisers have been valuing parcels that are 40 acres as home sites rather than ag so splitting land up artificially increases their cost, making them less available to legitimate farmers.

It makes sense to require that small parcels demonstrate economic viability prior to splitting. Mariposa County already requires such a demonstration prior to granting "Williamson Act" contracts.

Since the county has an abundance of non-prime land, it is reasonable to require significant mitigation if solar facilities are placed on prime soils. I support the policy that water rights not be transferred off productive lands in the event these sites are returned to agriculture some day in the future.

Maxwell Norton, Farm Advisor