Letter
O18

From: Eric Larson
To: CAP
Subject: Farm Bureau CAP
Date: Monday, September 25, 2017 1:11:45 PM
Attachments: County CAP.pdf

Re: County of San Diego Climate Action Plan (PDS2015-POD-15-002)

Farm Bureau comments attached. Please acknowledge receipt. I O18-1

Regards,

Eric Larson
Executive Director
San Diego County Farm Bureau
760-745-3023

Response to Comment Letter O18

San Diego County Farm Bureau
Eric Larson, Executive Director
September 25, 2017

O18-1 The comment provides introductory remarks. No response is required.

FARM BUREAU SAN DIEGO COUNTY
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September 25, 2017

Maggie Soffel
Land Use/Environmental Planner
County of San Diego
Planning & Development Services
5510 Overland Ave., Suite 310
San Diego, CA 92123

Reference: County of San Diego Climate Action Plan (PDS2015-POD-15-002)

Dear Ms. Soffel,

The San Diego County Farm Bureau (Farm Bureau) appreciates this opportunity to comment on the County of San Diego's Draft Climate Action Plan (Draft Plan). Farm Bureau is a non-profit organization that serves as the voice of local farmers. San Diego County's farmers produce a wide variety of crops on approximately 250,000 acres of irrigated farms and rangeland and make a significant contribution to the region's economy, environment, and setting. O18-2

The Draft Plan attributes only five percent of greenhouse gas (GHG) emissions in the unincorporated area to farming activities. However, we believe that research and incentive based programs can have a significant impact by assisting the County of San Diego in reaching its GHG reduction goals through ongoing and improved agricultural practices.

Carbon farming is the general term applied to the agricultural practices that remove CO_2 from the atmosphere. San Diego County is fortunate that the urban community has farmers as close neighbors who can be active partners in offsetting the GHGs created by urban needs for transportation, electrical generation, solid waste disposal, and natural gas. The carbon farming practices that can provide region-wide benefits include planting and maintaining permanent crops, no-till farming, and the use of organic materials on irrigated crops and rangeland. O18-3

As a preamble to our comments on the Draft Plan, we would like to bring your attention to the pending report *Linking Climate-Friendly Practices to San Diego County's Climate Action Plan: An Opportunity Analysis of Carbon Farming in the Unincorporated County*. The report is being prepared for the San Diego Food System Alliance by Batra Ecological Strategies. When received by the County, you will find detail and quantification on a number of the matters we will address in general terms in the following comments.

Serving San Diego County Agriculture Since 1914

O18-2 The comment provides information about the San Diego County Farm Bureau and their role in the San Diego Region as a voice of local farmers. No response is required.

O18-3 The comment asserts that improved agricultural practices, specifically carbon farming, can help the County to achieve GHG emissions reduction targets. The County appreciates and has reviewed the report that is referenced in this comment. With regard to the benefits of carbon farming practices in aiding the County's efforts to reduce GHG emissions, please see Master Response 11 regarding carbon sequestration.

T-1.2: Acquire Agricultural Easements - Measure Summary

The potential GHG reductions through the Purchase of Agricultural Conservation Easement (PACE) Program appear to be substantial. The 443 acre goal for 2020 and the additional 4,430 acre goal by 2030 seem conservative based on overall acreage currently devoted to agriculture. It should be recognized that as a voluntary program participation can be elastic depending on the level of incentives. O18-4

T-1.2: Acquire Agricultural Easements - Supporting Efforts

In our examination of the Draft Plan we see carbon farming gets a short mention in this section. Carbon farming practices are now receiving attention for providing substantial opportunities for GHG reductions through carbon sequestration. It is our suggestion that the Draft Plan include an expanded discussion on carbon farming and its benefits. O18-5

SW-1.1: Increase Solid Waste Diversion

While this section of the Draft Plan does not rely on specifics, we think it is important to mention the role agriculture can play in solid waste diversion. Organics play a significant role in soil improvement and mulching on farms. When treated green waste and compost are used on farms soil moisture retention improves reducing water demand, soil fertility improves reducing fertilizer needs, and rangeland improves creating additional forage. In each case the net result is improved plant growth that creates increased carbon sequestration. O18-6

W-1: Reduced Potable Water Consumption

The majority of irrigated farms in San Diego County use potable water purchased from municipal water districts for irrigation. Through observation we would put the amount of potable water usage in the range of 60,000 to 80,000 acre feet per year. When recycled water is treated by reverse osmosis to remove excess salts, the water is suitable for irrigating most all crops. We believe there is an opportunity to reduce potable water consumption and at the same time increase available supplies of potable water for urban uses by supplying farms with recycled water so they can roll off the potable water supply.

One of the biggest challenges to farming in San Diego County is the price of potable water used for irrigation. In the face of the tripling of water prices in just over one decade, several thousand acres of permanent crops have been taken out of production. With the loss of that farming acreage the GHG sequestration capacity of farms is lost as well. The City of Escondido's upcoming delivery of recycled water to farms will be at a price substantially lower than the cost of potable water and the early indications on the City of Oceanside's plans for delivery of recycled water to farms also shows substantial water cost savings may be achieved. O18-7

Bringing recycled water to farms could be another significant element in the County's GHG emission reduction strategy through reduced potable water use and farmland preservation that would guarantee the continuation of carbon farming practices.

O18-4 This comment suggests that the CAP should include increased targets related to GHG Reduction Measure T-1.2 and the expansion of the PACE program. The County appreciates the feedback related to this measure.

The historical rate of development rights acquired by the County under the current PACE Program was used to project the dwelling units offset under an expanded program. The County acquired development rights for a dwelling unit for every 24.6 acres acquired in calendar years 2016 and 2017, for a total cost of $1.9 million. The number of dwelling units offset under the expanded program is based on the amount of annual funding appropriated by the County Board of Supervisors (up to $1.5 million per year between 2020 and 2030), and the estimated cost per acre and acres per dwelling unit based on the current program, as described above. Using these metrics, it was determined that the County would need to acquire 443 acres of land to offset 18 dwelling units.

The CAP is a comprehensive plan to achieve county-wide GHG emissions reductions and contains 11 strategies, 30 GHG reduction measures, and numerous supporting efforts that are organized under five GHG emissions categories including built environment and transportation, energy, solid waste, water and wastewater, and agriculture and conservation. As described on page 5-2 of the CAP, each of the components of the CAP is intended to functionally decrease GHG emissions. However, the CAP is a plan, and the County recognizes that there may be variations in how measures actually perform over time. Hence, the CAP also contains a robust implementation and monitoring framework that will ensure that the County can respond and adjust to measure that underperform, or adjust accordingly when measures perform better than anticipated. As such, the County may adjust the potential for reductions related to the PACE program in future CAP updates.

This comment will be included as part of the Final EIR and made available to decision makers prior to a final decision on the project.

O18-5 The comment suggests that the CAP should include a discussion of carbon farming. The County appreciates the comment regarding the potential benefits of carbon farming in the efforts to reduce GHG emissions. Please see Master Response 11 regarding carbon sequestration which responds to this issue.

O18-6 The comment provides information related to the benefits of utilizing organics for soil improvement and mulch on farms which can help the County meet increase waste diversion targets. The County appreciates input regarding this issue. Please refer to Master Response 11 regarding carbon sequestration. This comment will be included as part of the Final EIR and made available to decision makers prior to a final decision on the project.

O18-7 The comment provides background information about the amount of potable water that is consumed by farms each year and suggests that the provision of recycled water could help achieve GHG emissions targets. The County appreciates the input on this topic and understands the importance of the issue. However, the County does not provide water services to the incorporated area. Individual water districts are the providers of potable and recycled water throughout the County. However, the County does support efforts to provide recycled water, and is coordinating where possible to extend the provision of such service. The comment does not address the adequacy of the Draft SEIR. This comment will be included as part of the Final EIR and made available to decision makers prior to a final decision on the project.

A-1.1: Convert Farm Equipment to Electric

Mention is made in this section that the projected conversion of eight percent of farm equipment to electric is based on historic participation in the San Diego County Air Pollution Control District's incentive programs. We agree that conversion should be based on incentives. Basing the projection on historical use does not take into consideration that as batteries and torque capacity of electric engines improve, there will increased interest by farmers to participate in incentive programs. O18-8

A-1.2: Convert Stationary Irrigation Pumps to Electric

Conversion of irrigation pumps to electric has been ongoing. Of the pumps not yet converted there will be some number without access to electric power. In many of those cases the cost of bringing electricity to the site may be prohibitive and assistance will be needed. O18-9

Strategy A-2: Increase Carbon Sequestration

The Draft Plan recognizes that trees offer an excellent opportunity for carbon sequestration. We applaud the Draft Plan's call for 182,348 trees to be planted in new residential development and on public lands by 2050. It must be pointed out that San Diego County's farmers are currently maintaining approximately 3.5 million trees at no cost to the public. We estimate that as many as one million trees have been removed or simply abandoned over the past several years on local farms solely due to of the cost of water. It is our opinion that a robust conversation about maximizing the County's carbon sequestration capacity by trees should include discussion on maintaining and expanding the current tree canopy on local farms. That conversation must also include the opportunities for the use of recycled water. O18-10

As a final comment we would like to restate and stress that farms can make a substantial contribution to the County's GHG reduction efforts. Carbon sequestration by trees and other permanent crops, use of organic soil amendments and mulches, delivery of recycled water to farms, rangeland improvements, and voluntary farmland preservation efforts will pay dividends in reducing GHG's. While efforts such as reducing vehicle miles and energy efficiency of buildings can be accomplished as straight-line efforts, agriculture's capacity to assist in GHG emission efforts requires something of a holistic approach on the viability of farming. Millions of farm trees can sequester substantial tonnage of carbon, farms and rangeland can accept a virtually unlimited amount of compost, and farms can replace their potable water use with recycled water. Each of those elements have linkages that will require exploration. O18-11

Again, thank you for this opportunity to comment.

Sincerely,

Eric Larson
Executive Director

O18-8 The comment suggests that the County may realize additional GHG emissions reductions from GHG Reduction Measure A-1.1 because farmers may take advantage of incentives because of the improvement of electrical engines. The County acknowledges this comment and appreciates the feedback. Chapter 5 of the CAP specifies that the CAP is a dynamic document that would be continuously assessed and monitored. The County would conduct annual monitoring of the CAP to track progress and identify where further efforts and additional resources may be needed. Adjustments would be made to the CAP if measures fall short of the targets or additional measures become available. The County cannot provide specific details regarding potential incentives but does recognize that this will likely be a determining factor in participation rates. The comment does not address the adequacy of the Draft SEIR. This comment will be included as part of the Final EIR and made available to decision makers prior to a final decision on the project.

O18-9 The comment states that the conversion of irrigation pumps to electric has been ongoing. It also states that of the pumps not yet converted, there will be some number without access to electric power and that the cost of bringing electricity to the site may be prohibitive and assistance will be needed. The County acknowledges this comment and values the input regarding this measure. The County cannot provide specific details regarding potential incentives but does recognize that this will likely be a determining factor in participation rates. The comment does not address the adequacy of the Draft SEIR. This comment will be included as part of the Final EIR and made available to decision makers prior to a final decision on the project.

O18-10 The comment expresses concern that the County should do more to help preserve existing trees on farmlands and the carbon sequestration benefits they provide, including providing recycled water. The County acknowledges this comment and recognizes the importance of the issue. The County will look for ways to continue to partner with farmers on this tree preservation effort in the future. The comment does not

	address the adequacy of the Draft SEIR. This comment will be included as part of the Final EIR and made available to decision makers prior to a final decision on the project.
	O18-11 The comment provides a summary of the benefits that farms can provide to help the County achieve its GHG emissions reductions. No further response is required.