



To: Honorable Chair Fletcher and Supervisors

From: Carbon Sink Farms, San Diego

Date: November 11, 2021

RE: Climate Smart Agriculture Policy in San Diego County

Dear Mr. Fletcher,

Carbon Sink Farms is a collaboration of small farms across San Diego who are committed to reducing greenhouse gas emissions and improving climate resilience by shifting our agricultural practices. For the last few years, we have been innovating our practices and participating in training to ensure we are informed partners in the policy making process. The signatories on this letter agree that there are **three areas** where the Board of Supervisors and County staff can take **immediate action** to improve the resilience of our farms and food system.

Area One: County Climate Action Plan

It is our understanding that the CAP has restrictive requirements that limit creativity, however, we are aware that Santa Clara County and others have found a way to incorporate carbon farming into their CAP mitigation calculations and are confident that San Diego can do the same.

The State of California and US Department of Agriculture have already validated the use of two tools--Carbon Farm Plans and COMET-Planner--to calculate the specific sequestration of greenhouse gas emissions of 32 carbon farming practices. A "Carbon Farm Plan" can be utilized to document potential sequestration and monitor practice implementation. COMET-Planner can be utilized to quantify the specific sequestration of each carbon farming practice. Given the availability and verification of these tools, we recommend the following actions:

Recommendation 1: The San Diego County CAP includes a voluntary and incentivized opportunity for farmers to contribute new and additional carbon farming sequestration to mitigation targets.

Recommendation 2: San Diego County provides free technical assistance for the voluntary development of Carbon Farm Plans by individual farms to calculate GHG sequestration capacity and verify practice completion.

Recommendation 3: San Diego County validates the use of COMET-Planner as the mechanism for quantifying and verifying offset amounts.

Recommendation 4: A local study is undertaken to establish appropriate incentive amounts based on the cost of implementation in San Diego County.

Area Two: De-Carbonization Strategy

The San Diego County Board of Supervisors and County staff understand the limitations of the CAP and have launched a more comprehensive planning process to address the climate crisis. We are enthusiastic about the De-Carbonization Strategy because we see it as a strategic opportunity to:

- include the existing and ongoing contribution of San Diego farms to GHG sequestration;
- identify and compensate farmers for the existing and ongoing co-benefits and ecological services provided by our farms;
- identify projects that defend agricultural livelihoods and improve the resilience of our operations; and
- develop a pathway for new farmers to accelerate carbon farming in our County.

We were thrilled to see so many of these concerns reflected in the Draft De-Carbonization Strategy and intend to engage in the public comment process to help improve and clarify components of the plan. However, we want to make sure we lift up these broader recommendations for your consideration:

Recommendation 5: Food system components are mentioned throughout the document but are minimal in the “agricultural sector”. We recommend a unique “Food System Sector” in the De-carbonization Strategy. This will ensure a plan that maximizes local production and consumption of climate-smart, San Diego-grown products within our region.

Recommendation 6: Development of a “Carbon Drawdown Plan” that includes incentives to farmers for the ongoing sequestration and ecological services provided by San Diego farms. The inclusion of ongoing sequestration is critical to protecting agricultural lands and livelihoods and essential to maximizing the co-benefits of climate-smart farming for San Diego.

Recommendation 7: Identify opportunities to strengthen and incubate new, climate-smart farmers and local food distribution businesses and encourage public/private partnerships that can help these new businesses to thrive.

Area Three: American Rescue Plan Act Funds

We applaud the \$20 million allocation of ARPA funds to our local food system and are eager to support the implementation of exciting new projects! To ensure the best use of these funds we recommend:

Recommendation 8: The County broadens the description of fund allocation from “community gardens” to “locally-grown community food projects” to ensure that funds are available for both production and distribution of fresh produce within our most underserved neighborhoods.

Recommendation 9: The County reduces barriers and increases equitable access to ARPA funds by streamlining and simplifying the contracting process so that smaller, community-based organizations can participate.

Recommendation 10: The Board of Supervisors directs staff to prioritize purchasing produce with County funds from farms or businesses with a climate resilience component.

Recommendation 11: The County includes language in its food procurement policies that prioritizes purchases from farms with an active Carbon Farm Plan.

We sincerely appreciate your immediate action on our recommendations and look forward to continued dialogue and partnership in achieving the best economic, social and environmental outcomes possible for San Diego County.

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