



FARM BUREAU SAN DIEGO COUNTY

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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.

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 CO₂ 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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

Again, thank you for this opportunity to comment.

Sincerely,



Eric Larson
Executive Director