

Letter
019

From: Soffel, Maggie
To: Kazmer, Gregory
Subject: FW: County CAP Comments
Date: Tuesday, September 26, 2017 1:24:37 PM
Attachments: SDFSA-FINAL_CountyCAP_Sept2017.v1.pdf

From: Elly Brown [mailto:elly@sdfsfa.org]
Sent: Monday, September 25, 2017 3:37 PM
To: Soffel, Maggie <Maggie.Soffel@sdccounty.ca.gov>
Subject: County CAP Comments

Dear Maggie,

Please see the comments attached from the San Diego Food System Alliance for the County CAP. Thank you

Elly

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Elly S. Brown
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Early Bird Registration now open until 8/26 for Food Waste Solutions Summit III, September 26, 2017. Our annual Summit is an action-packed convening for multi-sector leaders and advocates committed to reducing food waste and hunger in San Diego County.

Response to Comment Letter O19

San Diego Food System Alliance
Elly Brown, Alliance Director
September 25, 2017

O19-1 The comment provides introductory remarks. No response is required.

I O19-1

September 25th, 2017

Maggie Soffel
 Planning & Development Services
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 San Diego CA 92123
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RE: Climate Action Plan (CAP) Public Review PDS2015-POD-15-002, PDS2016-GPA-16-007, LOG NO. PDS2016-ER-16-00-003

Dear Ms. Soffel:

On behalf of the San Diego Food System Alliance, please accept this comment letter for the County of San Diego's Draft Climate Action Plan for the unincorporated areas of the County. The Alliance is a collaborative of 40 Voting Members and over 100 groups in our network committed to creating an equitable and sustainable food system in San Diego County. Our network consists of experts in a variety of food system issues and organizational representatives from local government, nonprofits, and food businesses. With the most number of organic farms and small farms than any other county in the nation, San Diego County has the potential to take on a leadership role in supporting our local food producers and consumers to make sustainable choices. We believe that the Climate Action Plan is a critical opportunity to fulfill this important vision.

Agriculture and food systems is an important driver of San Diego's economy. If this economy is not supported through the measures provided by the Climate Action Plan and ecological synergies leveraged through co-benefits, our food system will not sustain the level of productivity into the future.

Below, we emphasize the recommended strategies provided during the Stakeholder process, focused on Consumption Behaviors, Agriculture and Solid Waste, as these are critical elements to ensure that we have a resilient food system for future generations. For the Agriculture section, we have additional insights gathered in an upcoming report, *Linking Climate-Friendly Farming Practices to San Diego County's Climate Action Plan: An Opportunity Analysis of Carbon Farming in the Unincorporated County*. This report, prepared for the San Diego Food System Alliance by Batra Ecological Strategies will be finalized by Oct/ Nov 2017 and we urge that the details and measurements from the report be included in the current Climate Action Plan. The County of San Diego has an important role in influencing its citizens and the private-sector in this undeniable anthropogenic climate crises which is real and urgent.

1. Consumption Behaviors – Reduce Consumption of Carbon Intense Foods

The International Panel on Climate Change (IPCC) found that the greatest potential for emissions reduction from agriculture exists on the demand side. Our appetite for meat is a major driver of climate change. US consumption per capita is the highest in the world, after Luxemburg and three times the global average. The USDA recommends approximately 737 g of meat, poultry, and eggs per week; yet, U.S. consumption per capita is on average 2,254 g per week¹. Livestock production accounts for 14.5% of global anthropogenic GHG emissions, more than the entire transportation sector, and 25% of the global water footprint². In California, animal feed production consumes a quarter of California's irrigated water³. The increasing efficiency of animal agriculture and resulting low prices due to industrial agriculture practices, which attributes to air, water, and land pollution, is transitioning meat from an occasional food to an everyday food, particularly in industrialized nations. If current global and US meat and dairy consumption trends continue at current growth rates, GHG emissions from meat and dairy production will — by itself, even without non-agricultural sources of GHG emissions included — cause global emissions to nearly exceed the 2050 emissions threshold of 2°C increased warming over pre-industrial temperatures. Even if every other sector dramatically reduced its emissions, we could not meet those targets with current meat consumption trends⁴.

¹ <https://www.epa.gov/climatechange/2015/01/15/2015-report-16-factors-to-look-inside-healthy-eating-patterns-to-reduce-meat-consumption>

² http://www.ams2.org/pdf/funp-geta_oct_2012.pdf

³ <http://www.fao.org/news/story/0/197623/related>

⁴ http://waterfootprint.org/fr/media/download/5/508/508-2012-Water-Meat-Dairy_1.pdf

⁵ 2013 USDA Farm and Ranch Irrigation Survey

⁶ Bajželj, Richards, N. Howland, et al. Importance of food demand management in climate mitigation. Nat Clim Chang. 014;4(10):924-929. doi:10.1038/nclimate2353

San Diego Food System Alliance

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O19-2

O19-3

O19-2 The comment provides background information about the San Diego Food System Alliance and expresses support for the CAP. The comment provides a summary of the comments that will follow. Please refer to response to comments O19-3 through O19-26 below.

O19-3 The comment contains information related to the potential GHG emissions reductions that could be achieved if residents were to eat less animal-based protein. The comment suggests that the CAP should include targets for reducing the amount of animal protein consumed in the unincorporated area. This comment is acknowledged. This comment does not raise environmental issues related to the adequacy of the Draft SEIR. However, as part of the *Live Well San Diego Food System Initiative*, the County currently implements Eat Well Practices to expand healthy and sustainable food and beverage options offered by the County, as described on page 1-7 of the CAP. In addition, the County will explore funding opportunities and collaborations to provide information about the impacts of food choices through public outreach and education, and track the Eat Well Practices, which have an emphasis on less carbon-intense foods and more plant-based meals. The County will also work to promote the adoption of the Eat Well Practices by outside organizations to support climate beneficial practices and has included new supporting efforts under GHG Reduction Measures T-1.2 and T-1.3 that would explore the establishment of new funding and collaborations to provide information to the public about food choices and promote the adoption of Eat Well Practices. This comment will be included in the Final SEIR and made available to decision makers prior to a final decision on the project.

Organizations across the world are calling for meat and dairy reductions, especially in industrialized nations, where consumption is the highest. Furthermore, cities and institutions across the nation are also taking on this call as a carbon reduction and chronic disease prevention measure. A *less meat, better meat* approach could generate important health benefits, cost savings, and GHG reductions. For example, the City of Cincinnati found that if 10% of Cincinnatians ate meat one less day per week, CO2 emissions would be reduced by 75,000 tons per year⁵. The overconsumption of meat is linked to costly diet related diseases like heart disease, diabetes and some cancers⁶. A reduction in overall meat consumption would generate important health benefits and cost savings for the county and reduce GHGs while freeing up budgets to purchase meat produced in more sustainable agriculture systems, such as those practiced in San Diego County. In contrast to industrial systems, livestock grazed on grasslands can help sequester carbon on rangeland and offer a healthy alternative to industrially produced meat. Promoting a healthy, reduced meat diet and encouraging a transition to local and sustainable meats can have positive health and environmental impacts, including reducing the use of and in some cases restoring natural resources.

Key strategies to support the CAP includes County procurement and broad public education San Diego's Climate Action Plan should support strong implementation and tracking of Eat Well Practices and set specific targets for reducing the purchases of animal foods by county agencies or for food service that operates on county property. Eat Well Practices are properly implemented and fortified by the counties Climate Action Plan, they will help significantly reduce the climate impact of the 7 million meals served by San Diego County each year. These impacts can easily be tracked using carbon footprint and procurement data. It can also promote and encourage shifts and tracking of food procurement by large institutions that serve food in San Diego, like the San Diego Unified School District.

2. Agriculture's Carbon Sequestration Potential & Ecological Co-Benefits

Agriculture contributes to over 20 percent of global anthropogenic greenhouse gas emissions. Moreover, agricultural intensification has had major detrimental impacts on the terrestrial and aquatic ecosystems of the world. The doubling of production during the last 35 years was associated with a 6.9 fold increase in nitrogen fertilization, 3.5 fold increase in phosphorus fertilization, and a 1.7 fold increase in irrigated land⁷.

In stark contrast to the carbon intensive practices of large-scale industrial agriculture, the organic and sustainable practices agriculture systems widely practiced in San Diego County, the county with the largest number of small and organic farms in the country, can help reduce GHG emissions. Farms using organic methods emit from one-half to two thirds less carbon dioxide per acre of production than large industrial farms⁸. These systems also improve soil structure and water-holding capacity and are more resilient in periods of drought.

Furthermore, agricultural land can serve as an effective GHG sink over the long-term only if agricultural systems are adopted which improve overall soil quality and provide for relatively stable GHG reduction or sequestration that can be verified and measured with reasonable accuracy. A suite of practices called "carbon farming practices" positioned to support the County's CAP goals offer multiple benefits including: 1) reducing GHG's, 2) building soil health, and 3) strengthening climate resilience.

San Diego County agriculture can help mitigate the effects of climate change and needs to be a stronger strategy within County's CAP. Permanent crops, such as San Diego County's top food crops (by dollar value), citrus and avocados, are already effectively storing carbon. Farmers in San Diego County currently have in excess of 3 million trees, which sequester approximately 48 pounds of carbon per tree each year⁹. Sustainable animal husbandry such as that practiced in San Diego County, can also increase carbon storage in local agricultural working lands. The report *Linking Climate-Friendly Farming Practices to San Diego County's Climate Action Plan: An Opportunity Analysis of Carbon Farming in the Unincorporated County* highlights the County's opportunities to support carbon sequestration and ecological co-benefits through agriculture. Significant portion of the recommendations around Ag Carbon Sequestration Potential & Co-Benefits below were provided by Puja Batra, PhD of Batra Ecological Strategies, author of the report. We strongly encourage the County of San Diego to refer to this report to develop a robust Climate Action Plan to support local agriculture.

⁵ <https://www.chathamhouse.org/sites/files/chathamhouse/publications/research/20151124DietClimateChangeWellesleyHapperFroggattExecSum.pdf>

⁶ <https://www.chathamhouse.org/sites/files/chathamhouse/publications/research/20151124DietClimateChangeWellesleyHapperFroggattExecSum.pdf>

⁷ <http://www.fao.org/docrep/005/y4137e/y4137e02b.htm>

⁸ http://www.globalagriculture.org/fileadmin/pics/weltagrabericht/FOE_Farming_for_the_Future_Final.pdf

⁹ http://www.arboreenvironmentalliance.com/carbon_tree_facts.asp

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O19-3
cont

O19-4

O19-4 The comment relates to the potential benefits of carbon sequestration through agricultural activities. Please see Master Response 11 regarding carbon sequestration.

<p>San Diego County agriculture is well positioned to be a part of the climate solution; however, many farms face challenges, such as high water and land costs, that risk shuttering their operations and undermining agriculture's carbon sequestration potential. The County of San Diego should actively engage and protect farming in San Diego County in order to mitigate the effects of climate change. San Diego 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 GHGs.</p>	O19-5
<p>3. Solid Waste</p>	
<p>While the Solid Waste section refers to the Strategic Plan to Reduce Food Waste, Solid Waste is the 3rd largest emissions category, accounting for 11% of total emissions. Its implementation is labeled as high cost. Yet implementation of the Strategic Plan to Reduce Food Waste will only yield 3% benefit by 2030. Overall, we believe that the CAP should select preference for the high diversion strategies that will yield the highest GHG benefits. The CAP should also leverage opportunities around cross-departmental/ cross-sectoral ecological co-benefits such as composting (waste diversion) to agriculture (compost use), water efficiency and water-wise gardening (compost use) and carbon sequestration (compost use).</p>	O19-6
<p><u>RECOMMENDED CHANGES:</u></p>	
<p>In Chapter 1, Introduction</p>	
<ul style="list-style-type: none"> • Consumption Behaviors <ul style="list-style-type: none"> ○ While several efforts of the Live Well Food System Initiative are mentioned (State of Food System Report, food donation, healthy retail, and Eat Well Practices), there should be more emphasis on the importance of the Eat Well Practices in its ability to impact the Scope 3 indirect carbon emissions. There is no explicit mention of the important intersection of diet, climate, and public health around the Eat Well Practices, including recommendations for serving less and better meat within foodservice operations at county facilities and leased sites with county jurisdiction. 	O19-7
<p>In Chapter 2, Greenhouse Gas Emissions Inventory, Projections and Reduction Targets</p>	
<ul style="list-style-type: none"> • Consumption Behaviors <ul style="list-style-type: none"> ○ Provide an explanation of indirect Scope 3 emissions and information on the significant climate impacts from food production and systems. These emissions are linked to consumption habits which procurement officers and residents should be aware of. For monitoring and calculating, Friends of the Earth has been working with a tool to measure emissions from food consumption using life-cycle assessments (LCA) data. County procurement data can easily be quantified to meet the criteria around emissions "that can be readily monitored and reduced through County actions". 	O19-8
<ul style="list-style-type: none"> • Agriculture's Carbon Sequestration Potential & Ecological Co-Benefits <ul style="list-style-type: none"> ○ Quantification measures from the report <i>Linking Climate-Friendly Farming Practices to San Diego County's Climate Action Plan: An Opportunity Analysis of Carbon Farming in the Unincorporated County</i> should be referred to in this section for agriculture's ability to not only reduce its own footprint (estimated in the CAP) but also to offset emissions of other sectors. We cannot positively conclude that agriculture in San Diego County is a positive emitter of GHGs. Unlike other parts of CA, most croplands in SDC are orchards which are C-sequestration practices. ○ Wildfire was not factored into the baseline emissions. While open space/ag emissions are very difficult to fully account for, the major categories or emissions such as wildfire – which have in past years been estimated by EPIC (2008) – should be included in baseline. 	O19-9
<ul style="list-style-type: none"> • Agriculture's Carbon Sequestration Potential & Ecological Co-Benefits <ul style="list-style-type: none"> ○ Wildfire was not factored into the baseline emissions. While open space/ag emissions are very difficult to fully account for, the major categories or emissions such as wildfire – which have in past years been estimated by EPIC (2008) – should be included in baseline. 	O19-10
<p>In Chapter 3, Strategies and Measures</p>	
<ul style="list-style-type: none"> • Consumption Behaviors <ul style="list-style-type: none"> ○ T-1.2: Include Eat Well Practices as a key measure in the CAP with the following goals: <ul style="list-style-type: none"> ▪ Reduce carbon and water footprint of total beef, pork, chicken, turkey, and dairy purchases by 20% by 2030 ▪ Increase organic and sustainable foods to 20% of total food purchases by 2030 ▪ Purchase 20% of total meat, poultry, eggs, milk, and produce purchases from the San Diego County region by 2030 	O19-11
<ul style="list-style-type: none"> • Agriculture's Carbon Sequestration Potential & Ecological Co-Benefits <ul style="list-style-type: none"> ○ Strategy A-2: Include preservation of existing orchard trees to support agriculture operations while sequestering carbon. New trees will take decades to reach the levels of carbon storage and 	O19-12
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O19-5 The comment expresses concern regarding high water and land costs which may prevent agricultural activities from continuing in the county. The comment suggests that the County should protect farming as a solution to climate change. The County notes that the 2011 GPU contains multiple policies which seek to preserve agriculture, see pages 5-15 and 5-16. Additionally, GHG Reduction Measure T-1.2 of the CAP seeks to expand the PACE program which would result in additional permanent agricultural easements.

O19-6 The comment suggests the CAP select the highest diversion strategies that will yield the highest GHG benefits and the County should look for ways to leverage cross-departmental co benefits such as composting to agriculture, water efficiency and water-wise gardening, and carbon sequestration. This comment does not address the adequacy of the CAP or the Draft SEIR; therefore, no further response is required or necessary. However, the following is noted.

Please refer to Master Response 9 on the selection of CAP measures. In addition, the Draft SEIR includes the Increased Solid Waste Diversion alternative. This alternative would modify GHG Reduction Measure SW 1.1 from a target of 75% solid waste reduction in 2030 proposed under the project to 80% by 2030.

In addition, the CAP addresses composting to agriculture with a supporting effort under GHG Reduction Measure T-1.2, which notes that the County will collaborate with stakeholders to develop carbon farming methods on agriculture lands and rangeland. In addition, carbon farming may be a project selected for implementation under GHG Reduction Measure T-4.1. Water efficiency and water-wise gardening strategies are addressed under GHG Reduction Measures W-1.1, W-1.2, W-1.3, and W-2.1, and carbon sequestration is addressed under GHG Reduction Measures A-2.1 and A-2.2. This comment will be included in the administrative record and made available to decision makers prior to a final decision on the project.

O19-7 The comment is related to the ability of Eat Well Practices to indirectly reduce carbon emissions by managing the types of

	<p>food that is served in County-owned or leased facilities. Please refer to response O19-3 above.</p> <p>O19-8 The comment is related to the quantification of Scope 3 emissions from food production. The approach used in the CAP (e.g., inclusion of specific sectors and related levels of scope) is consistent with CARB's most recent 2014 State GHG emissions inventory for which Scope 3 emissions from food production are not included.</p> <p>O19-9 The comment is related to the potential for agriculture to provide carbon sequestration benefits. Please see Master Response 11 regarding carbon sequestration.</p> <p>O19-10 The comment is related to the lack of inclusion of GHG emissions from wildfire in the CAP baseline emissions inventory. The County CAP is focused on measuring and mitigating emissions that are attributed directly to the County's behaviors and activities to determine how the County can do its part in reaching State reduction goals. Incorporating emissions from wildfires on an annual basis would potentially result in major emissions increases or decreases in each inventory year which would not reflect County actions to reduce day-to-day emissions. This approach is consistent with CARB's most recent 2014 State GHG emissions inventory. The California Department of Forestry and Fire Protection (CAL FIRE) is the appropriate agency responsible for assessing emissions and implementing programs that respond to wildfire because the County does not have jurisdiction over those activities. The commenter mentioned the incorporation of wildfire emissions in EPIC's San Diego County GHG Inventory. EPIC's methodology was to use the average emissions seen from wildfires in the County from 1990-2007 and apply it to 2008 (EPIC, 2013). This methodology is not consistent with the methodology used in the County CAP, which is to measure emissions that occur during the inventory year. Furthermore, using a 17-year average for each subsequent inventory may not reflect reductions because of adopted fire prevention efforts.</p> <p>While wildfires can occur because of human activity, and are occurring at an increasing rate because of climate change, it is</p>
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not generally considered a key anthropogenic source that is necessary to understand within a County Climate Action Plan. The County is; however, vulnerable to increasing wildfire risk due to increasing heat and drought from climate change. These issues are addressed in the vulnerability assessment and adaptation plan within the CAP.

O19-11 The comment suggests the inclusion of Eat Well Practices into GHG Reduction Measure T-1.2 which would encourage people to consume less animal-based protein. Please refer to response O19-3 above.

O19-12 This comment states that efforts should be made to preserve existing orchards as a way to sequester carbon, and suggests that efforts to develop recycled water or subsidize water could curtail loss. This comment is acknowledged. Please see Master Response 9 regarding the selection of measures. This comment does not raise environmental issues related to the adequacy of the Draft SEIR and no response is required. This comment will be included in the Final SEIR and made available to decision makers prior to a final decision on the project.

sequestration potential that existing trees have. Sequestration by a larger (older) tree is higher than that of a smaller (younger) tree in absolute numbers as well as rate, according to recent findings. This means that as trees get older, they continue to grow and sequester carbon at ever higher rates. Keeping older living trees in the ground is critical to any sequestration strategy. Investments in drivers of orchard tree loss, such as developing recycled water for agriculture and applying significantly lower water costs for its use by farmers, will help curtail losses of our existing sequestration and croplands and increase potable water availability for other uses.	
o Strategy A-2: Tree planting strategy for agriculture in the CAP is not actually linked explicitly to agriculture. It is for residential trees and County owned land, the latter which may or may not be farmland. No assumptions are listed for this strategy in Appendix C, so it is unclear what survivorship rates are assumed or whether water requirements have been factored in. Residential trees planted at the rate of 2 per residence may not actually see any survivorship. Property developers should be accountable for planting and maintaining the trees for the first 3 years such that at least 2 trees survive per residence by year 3. This required survivorship rate requires a higher planting rate. Water for these trees will also have a footprint associated with it, so net sequestration is likely to be lower than estimated.	O19-12 cont
o T-1.2: Fertilizer baseline in CAP does not have a strong reduction strategy associated with it. This should be considered as a primary measure. Carbon farming practice of compost application has sequestration and fertilization benefits, and also builds water holding capacity, several other farming benefits, and will provide a market for compost produced under the County's Strategic Plan to Reduce Waste. Setting targets for fertilizer use reduction, with carbon farming as a support measure, will build County commitment to soil friendly practices that have several resilience co-benefits, and will build momentum and interest in carbon farming in general.	O19-13
o T-1.2: Expand PACE's impact. 443 acre goal for 2020 and the additional 4,430 acre goal by 2030 seem conservative based on overall acreage	O19-14
o T-1.2: Include policies that provide agriculture production incentives and remove barriers to producing this local food to support the measure, "promote consumption of locally grown and raised food". Without local food, we cannot encourage the public to purchase local food.	O19-15
o T-1.2: While there are few dairy operations, San Diego County holds thousands of small farms, equestrian facilities, chicken farms and other manure producers. Enhanced onsite manure management education/outreach and manure management including composting facilities in agricultural areas where compost is returned to growing soils would be beneficial.	O19-16
o W-1: Reduce potable water consumption while increasing available supplies of potable water for urban uses by supplying farms with recycled water so they can roll off potable water supply. Supporting agriculture operations through water cost savings is critical to support carbon farming.	O19-17
o T-1.3: Regarding farmers markets promotion, similar to comment previously, more support needs to be provided to farmers to ensure agriculture operations are successful. Consider policies that provide agriculture production incentives and remove barriers to producing this local food.	O19-18
In Chapter 4, Vulnerability, Resiliency and Adaptation	
o Consumption Behaviors	
o Add: In order to encourage community resilience, residents of San Diego County must be aware of the sources of their sustenance, including imported food and related emissions and water use.	O19-19
In Chapter 5, Implementation and Monitoring	
o Consumption Behaviors	
o Consider adding a protocol for tracking the food related GHG emissions within public institutional foodservice and within facilities that are leased on public lands. Tools for this exist and are described below.	O19-20
o Consider adopting the Good Food Purchasing Policy beyond the County's Eat Well Practices, which stipulates measurement and reduction of GHG emissions from food with support provided by the Center for Good Food Purchasing Policy.	O19-21
o The GHG reductions from compost can be estimated using CDFA-developed tool online: compost-planner.com < http://compost-planner.com >	O19-22
o Agriculture's Carbon Sequestration Potential & Ecological Co-Benefits	O19-23
o Carbon farming should be given more prominence in the CAP as a strategy, and also to commit to measuring emissions and multiple co-benefits from demonstration projects done on County-owned lands so that future revisions of the CAP can include it as an enforceable measure.	O19-24
In Chapter 6, Outreach and Engagement	
o Consumption Behaviors	O19-25

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O19-13 This comment suggests that the tree planting rate associated with GHG Reduction Measure A-2.1 should be higher to account for the low survivorship. The comment also suggests that the measure should have included GHG emissions losses based upon the water that would be required to establish the trees. This comment is acknowledged. This comment does not raise environmental issues related to the adequacy of the Draft SEIR and no response is required. This comment will be included in the Final SEIR and made available to decision makers prior to a final decision on the project. Please also refer to responses O20-5, O20-7, and O20-8.

O19-14 The comment suggests that there are GHG emissions reductions to be gained from substituting compost use for synthetic fertilizer. This comment is acknowledged. This comment does not raise environmental issues related to the adequacy of the Draft SEIR and no response is required. However, the following is noted.

The CAP recognizes the benefits of sustainable agriculture practices and commits to collaborating with stakeholders to develop conservation and sustainable agricultural farming practices, carbon farming methods, and other climate beneficial practices on agriculture lands and rangeland, including practices and incentives that reduce the impact and use of synthetic fertilizer (CAP page 3-13).

O19-15 The comment suggests that GHG Reduction Measure T-1.2 should be expanded to acquire additional PACE lands. This comment is acknowledged. The comment does not raise environmental issues related to the adequacy of the Draft SEIR and no response is required. This comment will be included in the Final SEIR and made available to decision makers prior to a final decision on the project.

O19-16 The comment suggests that the CAP should include policies that encourage the production of local food. This comment is acknowledged. The comment does not raise environmental issues related to the adequacy of the Draft SEIR and no response is required. However, the County's Food System Initiative has been proactive in promoting locally-grown

branding of San Diego Grown 365, a strategy led by the San Diego Farm Bureau, and is actively involved in the San Diego Food System Alliance Reducing Barriers to Farming Working Group. In addition, County Department of Agriculture, Weights, and Measures Certified Farmers' Markets and certified producer requirements have been streamlined to make the process easier for growers and market managers to navigate and qualify. AWM also holds a Certified Farmers' Market 101 training and a Certified Farmers' Market Forum annually to support farmers selling at Certified Farmers Markets, as well as market operators and managers. AWM's website (www.sdfarmersmarkets.org) seeks to promote and support farmers' markets by maintaining a current listings of all active Certified Farmers' Markets in San Diego and providing a Certified Farmers' Market Roadmap to guide those seeking to establish a new Certified Farmers' Market in the county. This comment will be included in the Final SEIR and made available to decision makers prior to a final decision on the project.

O19-17 The comment suggests that the CAP should include policies that encourage composting and manure management. This comment is acknowledged. The CAP commits to exploration of manure management practices and incentives (see page 3-13), and the County's interdepartmental Composting Working Group is currently exploring ways to facilitate composting on farms and other sites. The comment does not raise environmental issues related to the adequacy of the Draft SEIR and no response is required. This comment will be included in the Final SEIR and made available to decision makers prior to a final decision on the project.

O19-18 The comment suggests that by providing recycled water to farms, GHG emissions be reduced and farming activities can be preserved. Please refer to Master Response 9 regarding the selection of measures. This comment is acknowledged. This comment does not raise environmental issues related to the adequacy of the Draft SEIR and no response is required. This comment will be included in the Final SEIR and made available to decision makers prior to a final decision on the project.

- O19-19** The comment suggests that the County should incentivize local agriculture. This comment is acknowledged. Please refer to response to comment O19-16. The comment does not raise environmental issues related to the adequacy of the Draft SEIR and no response is required. This comment will be included in the Final SEIR and made available to decision makers prior to a final decision on the project.
- O19-20** The comment suggests that the CAP include a measure related to community resilience and food supply. This comment is acknowledged. This comment does not raise environmental issues related to the adequacy of the Draft SEIR and no response is required. This comment will be included in the Final SEIR and made available to decision makers prior to a final decision on the project. Please refer to response O19-3 above.
- O19-21** The comment suggests that the County track food-related GHG emissions for facilities under the County's control. Please see response to comment O19-3. This comment is acknowledged. The comment does not raise environmental issues related to the adequacy of the Draft SEIR and no response is required. This comment will be included in the Final SEIR and made available to decision makers prior to a final decision on the project.
- O19-22** The comment suggests that the County adopt a Good Food Purchasing Policy that tracks food-related GHG emissions. Please see response to comment O19-3. This comment is acknowledged. The comment does not raise environmental issues related to the adequacy of the Draft SEIR and no response is required. This comment will be included in the Final SEIR and made available to decision makers prior to a final decision on the project.
- O19-23** The comment provides information about how to estimate GHG emissions reductions from compost. This comment is acknowledged. The comment does not raise environmental issues related to the adequacy of the Draft SEIR and no response is required. This comment will be included in the

	<p>Final SEIR and made available to decision makers prior to a final decision on the project.</p> <p>O19-24 The comment suggests that carbon farming should be included as a CAP strategy. Under GHG Reduction Measure T-4.1 (page 3-40 of the CAP), the County would fund/implement, and register direct investment projects, which may include compost additions to rangeland, as listed on page 2.7-25 and in Appendix B of the CAP SEIR. The County will develop a local direct investment program that will identify the specific projects the County will fund/implement in the unincorporated county to achieve the anticipated GHG reductions in 2030, and bring the program to the County Board of Supervisors for consideration by 2020. In addition, as described under GHG Reduction Measure T-1.2 (page 3-13 of the CAP), the County is committed to developing carbon farming methods on agriculture lands and rangeland as a supporting effort. See Master Response 11 regarding carbon sequestration and carbon farming. This comment does not raise environmental issues related to the adequacy of the Draft SEIR and no response is required. This comment will be included in the Final SEIR and made available to decision makers prior to a final decision on the project.</p> <p>O19-25 The comment suggests that language should be included in Chapter 6 of the CAP which inform the public about carbon and water impacts of food choices and seek to prevent food waste. The comment does not raise environmental issues related to the adequacy of the Draft SEIR and no response is required. This comment will be included in the Final SEIR and made available to decision makers prior to a final decision on the project. Please also refer to response O19-3 above.</p>
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- o Incorporate language that explains the cost-effectiveness of healthy, climate-friendly foodservice on public facing documents and notices, to increase awareness and community support of climate-friendly foodservice. Specific goals include:
 - Inform the public about the carbon and water impact of food choices
 - Engage the public in the prevention of food waste especially carbon intensive foods

O19-25
cont

Thank you for your consideration. I am available to answer any questions you may have regarding the recommendations submitted on behalf of our coalition.

O19-26

Ely Brown



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O19-26 The comment provides concluding remarks and no further response is required.

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