DATE: June 7, 2011

TO: James Caruso, Department of Planning and Building


The Agricultural Liaison Advisory Board (ALAB) appreciates the opportunity to review and comment on the Draft EnergyWise Plan. We thank you for presenting an overview of the plan and answering questions at our May 2, 2011 meeting. At our June 6, 2011 meeting we discussed it further and offer the following comments.

ALAB is fortunate to have as members of its board, producers who represent the diversity of commodities raised in this county. Each member is affiliated with other organizations which have addressed many of the concerns regarding better management practices relating to the wise use of energy and resources. The draft plan presented focused on ways the county and community can reduce greenhouse gas emissions and providing comparisons of two different scenarios for the future. It was the consensus of board that the plan does not accurately recognize many of the practices employed by producers already in this county. We would urge the planning department to conduct further research, and understand better the agricultural community before final adoption of this plan. As stated on page 2 of your introduction, the reduction measures, which will be part of the final CAP document, will be developed through a collaborative process between the community and the County staff. There was unanimous agreement that this should be one of the strongest points included in the final report. There is a wealth of information to be found with the producer organizations in this county.

Chapter 3

Figure 3-4. The EnergyWise Plan needs to clearly explain the GHG emission information in the introduction section, Figure 3.4 and Table 4.1. Footnotes need to be incorporated to remind the reader that these are baseline emissions for unincorporated area only and that the urban areas have been removed. Louise Jackson’s research indicated the rate of GHG emissions in urban areas is 70 times greater than the rate of agriculture. State wide Ag emissions are estimated at 6% while the plan puts our county at 18%. It appears more accurate data is needed.
3-5 Data limitations  According to the statement provided there is not sufficient data to establish baseline information. The door must remain open to the latest data being examined by the agricultural and scientific communities.

3-12. The graph shows that agriculture produces only 18% of the GHG, one of the lowest emitting sectors and that is not considering the sequestration that is happening. This is another reason to protect the Williamson Act as a method of mitigation.

Chapter 5

5-7. Energy Conservation Programs- Agricultural stakeholders should be added to the list. Although agricultural is one of the lowest emitting sectors as indicated in the plan, Ag can play a large role in helping mitigate emissions. This document should recognize and give credit for educational outreach done by agricultural organizations and the conservation programs implemented in this county. Most ranchers and farmers have management plans which include conservation methods.

5-18-If this is to happen there would need to be incentives or major funding to convert older equipment or tractors to purchase new zero emission vehicles.

5-20-Forming partnerships with stakeholders on forestation is definitely a positive step

5-38- We must find ways to utilize the things we are throwing away, such as methane. Continue to capture methane at landfills. One mitigation measure would be to mine methane and provide low cost loans to those agriculturalists who want to convert equipment to methane. There is some credence given to converting diesel to methane but it was also pointed out that there is research and development happening relating to diesel becoming more energy efficient.

5-65-There has been a rise in organic farming not only in the State but also in this county. It should be noted that while many farmers may not be certified as organic, strides have been made in irrigation methods, fertilizer and pesticide use, and planting methods. The term “reliance on industrial imputes” is misleading. All of agriculture uses inputs from companies who manufacture products whether inorganic or organic.

5-69- ALAB is in agreement with the plan’s supporting actions. ALAB would like the plan to recognize that where incentives can be developed to help the farmer economically they should be. Also the plan should encourage the board of supervisors to lobby our state and national representatives to put real incentives in the Farm Bill which would encourage farming practices that will be good for the environment, as well as, incorporate conditions that might help the producer be profitable.

5-71-Self Audit and Certifications. The Plan needs to be more inclusive and not just mention one program. The plan should encourage all agricultural commodity groups to have self assessment programs. Self audits and certifications should not be singled out for just vineyards. The Farm Bureau, Nursery Associations, Cattlemen’s Assn, etal has certification programs that promote water and energy efficiencies. It would be beneficial to either be more general and not name any specific program or name all which already exist in the county.
The reduction of **methane or manure collection** from livestock is not easily addressed in our county. We do not have active feedlots or substantial dairy operations which would produce larger amounts of manure. Our cattle graze in open pasture. Our cattle numbers are declining yet the data shows increased emissions? We should determine whether the data inputs are correct so we can determine an accurate end result.

It does not seem feasible that there would be that much mitigation from encouraging “buy local” instead of having our products exported. While it is important to encourage “buy local”, community gardens, retail marketing on the farm and farmers markets, there is research on both sides of the argument regarding local vs. export to be considered. It is also important to **celebrate the diversity of products and the reach our agricultural commodities have in feeding the county, the state, the nation and the world**.

**Sequestration**-San Luis Obispo County has Green House Gas (GHG) mitigation opportunities in agricultural soil tillage practices, grassland conversion, grazing management, riparian buffers, befoul substitutes, fertilization management and livestock management to name a few. These combined practices have the ability to avoid, sequester, and/or reduce CO2 (carbon dioxide), CH4 (methane) and N2O (nitrous oxide) emissions. Sequestration activities can enhance and preserve carbon sinks. The unique time dynamics and accounting issues of carbon sequestration: saturation (or equilibrium level) of carbon sequestration over time, potential reversibility of carbon benefits, and fate of carbon stored are the subject of extensive research at the present time. We suggest that the document encourages staying abreast of the latest scientific research on the subject to enable timely implementation and benefits specific to San Luis Obispo agriculture.

ALAB would also add the following comments:

1. When looking at this plan it is important to look at how economically feasible it is to implement energy saving programs and where incentives might be offered to help the producer implement migrations.

2. ALAB unanimously agrees that the preservation of agricultural lands is paramount. The preservation of Ag land is an important strategy in the success of the EnergyWise plan.

3. Although local marketing to the consumer is a small percentage of the equation it is beneficial to the community to encourage “buy local” Whether the product is bought locally from the farm or a farmers market or exported to another area to be sold it is important for the management practices used in raising the products be acknowledged by the buyers and consumers.

4. Regarding cattle grazing ....cattlemen are using rotational grazing, have introduced low emission and energy efficient water pumping systems and many have developed California Rangeland Management Plans already.

5. The county should look at the ConservationStewardship Program, and the Specialty Crop Research Initiative (SCRI) to fund cost-share dollars, financial rewards to farmers who achieve environmental goals, projects and research that reduce GHG emissions from various agricultural commodities.
6. LAB accepts the Plan has used standard formulas for the nitrogen calculations.

7. Members of ALAB have materials which provide data addressing new findings and better management practices in the areas of energy, waste, transpiration and land use. ALAB will make this material available through the Ag Commissioners’ office.

In closing ALAB would reiterate the statements made on page 3-10:

Agriculture plays a major role in the county’s economy, with an annual crop yield worth an estimated $713 million in 2010. Accurately accounting for emissions related to agriculture will help guide future policy decisions to reduce GHG in balance with economic considerations in the agriculture sector.

It is therefore imperative that as a variety of programs are implemented that all the commodities that help drive the economic engine, agriculture, are at the table as stakeholders. The producers are connected to valuable and up to date scientific data which will help any Energy Plan succeed and keep agricultural operations working toward profitability and sustainability.

Sincerely,

[Signature]

Dee Lacey