

DPR Comments:

- 1) The scope of the 2030 Plan will focus on practices and land management activities that sequester carbon. Implementation will occur on state-owned lands or be funded with State dollars on private, federal, and other public lands. Implementation will aim to achieve the State's vision by:
 - Protecting land from conversion to more intensified uses
 - Increasing conservation opportunities
 - Pursuing local planning processes that avoid greenfield development
 - Restoring and managing undeveloped lands
 - Expanding and managing green space in urban areas
 - Managing and preventing wildfires

San Diego County Department of Parks and Recreation (DPR) requests that the plan specify that funding could be used for the activities listed below:

- Acquisition and preservation of open space (e.g., MSCP preserve assembly)
 - Restoration projects (specifically riparian and oak woodland per the Plan)
 - Forest expansion (tree planting/replacement) in the unincorporated urban areas and open space areas in the County
 - Expansion and management of green space in unincorporated urban areas (e.g., community parks)
 - Brush management, tree trimming and other wildfire management activities on County lands
- 2) The Plan will also outline potential policy changes that may be leveraged as the State strives to meet the plan's goals and objectives. County DPR requests advanced notification of potential policy changes and the opportunity to review and comment on the proposed changes to assess how DPR may be affected.

PDS Comments:

- 3) On February 14, 2018, the unincorporated County of San Diego Board of Supervisors adopted a Climate Action Plan (CAP) that outlines a plan to reduce GHG by 40% and 77% from 2014 levels, by 2030 and 2050, respectively. The comments related to the CAP and the *California 2030 NWL Implementation Plan Concept Paper (May 2018)* (Implementation Plan) are found below:
 - a. The County would like to be added to the NWL Implementation Plan list of the interested parties. The County is interested in the relationship between the County CAP and the effects of the following:
 - i. CALAND modelling results;
 - ii. State's assumed reductions;
 - iii. State funding availability for local jurisdictions' reduction measure implementation; and
 - iv. Implementation Plan timing.

- b. The County would like to review and comment on the data collected by the State, during preparation of the Implementation Plan. The County anticipates comparing the Implementation Plan's data collection for monitoring State GHG reduction activities, to the CAP.
- c. As with the State's Implementation Plan, the CAP contains several preservation and conservation strategies to sequester carbon within sensitive lands and agricultural lands. The County would appreciate the opportunity to comment on the Implementation Plan's restoration and conservation methods.
 - a. The Implementation Plan Concept Paper recognizes that success in carbon sequestration depends on individual landowners and "place-based" conditions. In 2013, the County established the Purchase of Agricultural Easements (PACE) Program to conserve agricultural lands and protect them from conversion to suburban uses. Funds that would be available would help to advance the PACE program and the State's efforts to sequester carbon and reduce GHG.
 - b. A similar call for increasing State funding for preparation of composting ordinances and green waste recycling could also divert such waste from landfills, as well as present opportunities for sequestration on sites that both receive composted material and those that undertake composting. Funding of green waste recycling plants and local jurisdictions' ordinance preparation may also foster better local compliance with SB 1383.
 - c. The County has been preparing a local multiple species conservation plan (MSCP) for its northern area, known as the North County MSCP. The preservation lands proposed by the draft NCMSCP would increase the County's ability to sequester carbon. Increases in State funding to purchase lands for preservation would potentially decrease GHG production throughout the state.

The County appreciates the opportunity to comment on this the Implementation Plan Concept Paper and looks forward to our continued coordination with state agencies.