

**From:** Alexis Kuypers <akuypers@airburners.com>  
**Sent on:** Wednesday, February 18, 2026 1:47:49 PM  
**To:** CDFA Agricultural Resilience & Sustainability  
Office@CDFA <cdfa.oars@cdfa.ca.gov>  
**CC:** Michael Schmitt <mschmitt@airburners.com>  
**Subject:** Healthy Soils Program 2026 Practice Guidelines – Biochar Practice Definition

To the CDFA Office of Agricultural Resilience and Sustainability,

Thank you for the opportunity to provide comments regarding the 2026 Healthy Soils Program Biochar Practice Definition.

I respectfully request reconsideration of the language indicating that biochar must be produced off-site prior to soil incorporation.

Federal agencies are already implementing on-site biochar production as part of integrated forest health and land management programs. The U.S. Forest Service and California State Parks operate multiple Air Burner systems for wildfire mitigation and vegetative waste reduction, producing biochar directly at the treatment location. This approach eliminates hauling, reduces transportation emissions, and supports immediate soil amendment applications.

USDA NRCS recognizes biochar as Conservation Practice Code 336 (Soil Carbon Amendment). Eligibility is based on material quality standards — including carbon stability, contaminant thresholds, and feedstock documentation — not the geographic location of production.

Restricting Healthy Soils eligibility to off-site production may unintentionally limit:

- On-farm residue utilization
- Forest thinning and fuels reduction integration
- Storm debris diversion from landfills
- Transportation emission reductions
- Participation by rural and remote producers

Air Burners function as air pollution control devices and produce consistent, high-carbon biochar from clean woody biomass. In the San Joaquin Valley Air

Pollution Control District, Air Burners are recognized as Best Available Control Technology (BACT) for vegetative waste processing BACT SJAQ.

BACT determinations evaluate cost, emissions performance, and commercially available technology. Recognition as BACT reflects the environmental performance of controlled air curtain combustion relative to grinding, hauling, composting, or open burning.

If the intent of the off-site requirement is quality assurance, eligibility could instead be based on documented biochar testing and air compliance verification, consistent with NRCS standards and existing air district frameworks.

California has the opportunity to align Healthy Soils guidance with federal conservation implementation already underway and support scalable, standards-based carbon sequestration through qualified on-site production.

Thank you for your consideration.

Respectfully,

Alexis Kuypers

**Air Burners Inc.**

National Account Manager

[Schedule a chat](#)

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From: Anthony Myint <anthony@zerofoodprint.org>  
Sent on: Friday, February 6, 2026 10:48:46 PM  
To: CDFA Agricultural Resilience & Sustainability Office@CDFA <cdfa.oars@cdfa.ca.gov>  
Subject: Public Comment by Zero Foodprint

Hello CDFA OARS team,

I recently submitted a comment through your portal and I think in my enthusiasm for soil health, I included some typos (my space bar is sticky and the portal didn't highlight any spell check errors!).

Please use this version for your review and/or your records.

Best,  
Anthony

\* \* \*

Thank you for the opportunity to comment. My organization, Zero Foodprint is a recipient of a prior award and I have two, related comments.

Overall, because the funding is from the Climate Bond, and one main principle is "directing investments strategically to advance statewide climate priorities" such as acreage and CO<sub>2</sub>e sequestration estimates set forth in AB1757, I believe this solicitation, or future ones must factor in the applicant's plan and ability to optimize the climate benefit.

To use a hyperbolic example, if two applicants were qualified/perfect and equal in all administrative and equity aspects, and one applicant's plan was to use ~\$3 million to implement 100 acres of CPS 390 Riparian Herbaceous Cover ("Convert Irrigated Cropland to Permanent Unfertilized Grass/Legume Cover Near Aquatic Habitats") their project would only sequester 63 total tons CO<sub>2</sub>e, which is a sub-optimal and potentially very irresponsible use of public funds, since the cost-effectiveness of their carbon sequestration might be ~500x less effective than another applicant's.

If this was a private sector program, it's possible that an applicant's plan to strategically optimize the use of funds could even be the single most important and differentiating aspect of an application, and so I think the CDFA HSP BGR program should really consider minimally including an evaluation of this plan. The "impact optimization" component of the rubric, that I envision would be quantitative and could be expressed in terms of CO<sub>2</sub>e sequestration or metrics related to water quality or conservation, biodiversity, etc. I know that Re:plan and other elements include some of this quantifiable impact tracking and my suggestion is that this should be part of the criteria for deciding which applicants are entrusted with the stewardship of state funds.

I'll enter my second comment here due to lack of space above.

This suggestion is in relation to matching funds or cost-share. The present guidelines state that this is not factored by the review committee: "The Technical Review Committee will not factor matching funds into application scores as that practice can disadvantage low-resource organizations in the process of building capacity."

I respect this stance but it is my opinion that in order for the state to meet state targets around working lands carbon sequestration, there would need to be significantly more resources than currently available (about 10x what is available through Prop 4, and available on an ongoing basis). As such, I believe that at least a portion of the available funds should be used in coordination with private sector funds. Using a simple example like a compost project, a farmer might be willing to pay as much as the fertilizer would have cost--let's say that is 1/3 of the cost. A jurisdiction may be willing to pay 1/3 of the cost as part of their SB1383 procurement. In an ideal world, CDFA HSP funds could be used to fill the gap of 1/3.

Presently the application process would not prioritize applicants who could coordinate such cost-sharing systems to leverage state funds for greater impact. This ensures low-resource organizations are not disadvantaged, but it also ensures strategic use of funds is not prioritized. A better balance would be struck by ensuring at least \_\_% of the total funds are not awarded to applications that incorporate matching funds strategies, but that some \_\_\_% portion of the total funds prioritize greater impact/cost-effectiveness.

Furthermore, the materials outline that: "OARS collects matching funds information, however, to communicate instances in which a BGR can leverage state funds for a broader impact and to account for all project costs." I believe the current system allows for this documentation in some cases, but not most. Let me explain. Example: A 100 acre farm project for CPS 340 Cover Crop Planting (Add Legume Seasonal Cover Crop to Irrigated Crop") involves a pay rate of \$123.82 per acre. There is no functionality within the current invoice to only request \$90/acre, for example. There is functionality to indicate additional cost-share, like if the true cost was \$143.82 per acre, then a grant manager could indicate that \$20 of matching funds was involved with the project. But if for example, the farmer or a company or a philanthropist was paying for a portion of the project, there is not presently a way to adjust the pay rate or to enter a bespoke, lower rate request.

This kind of operational change is not necessarily part of your solicitation process, but is something I've been trying to meet with CDFA staff (Carolyn Cook and Michael Wolf) to dig into. My goal here is to save the state money and/or to extend the benefit of each dollar and it could be operationalized through a simple process tweak, and then could also be prioritized in the selection criteria, if program managers would like to accomplish greater impact. Zero Foodprint is managing ~\$1-\$2 million per year in non-state resources that could be incorporated into the HSP program if circumstances could be aligned and the functionality streamlined.

Thank you!  
Anthony

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**Anthony Myint**  
Executive Director  
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510.599.2999 | he/they



[Watch our TED Talk](#)

\$9.5+ million awarded to 825+ farm projects

[Co-Founder, Mission Chinese Food, The Perennial](#)

*New ZFP business address: 490 43rd Street, Unit #332, Oakland, CA 94609*



February 18, 2026  
Office of Agricultural Resilience and Sustainability  
California Department of Food and Agriculture  
1220 N Street  
Sacramento, CA 95814

Re: Comments on HSP and SWEEP Block Grants Draft Application Guidelines, Draft GAP Manual, and Draft Practice Guidelines

Dear OARS staff,

On behalf of the California Climate and Agriculture Network (CalCAN) and American Farmland Trust (AFT), we write to provide feedback on the Healthy Soils Program (HSP) & State Water Efficiency and Enhancement Program (SWEEP) Block Grants Draft Application Guidelines.

We are excited to see the block grant program continue to evolve based on lessons learned from the pilot program. We also appreciate and support the proposed new changes to provide additional flexibility and lower administrative costs for block grant recipients, such as the flexibility in the allocation between administration and technical assistance, the proposal to phase in independence in project approval and verification, and the two-phase application process. Additionally, we think the concept proposal and inclusion of locally-defined priorities along with portfolio balancing will further support regional collaboration and better geographic coverage across the state.

We also appreciate the proposed Common Objectives and Performance Measurement Framework to support program quality and give Block Grant Recipients clear guidance on program expectations, as well as the commitment by CDFA to reviewing quarterly reports and verification materials within 10 business days.

We were pleased to see that the block grant model has resulted in more HSP projects implementing cover cropping, mulching, and hedgerow plantings, and support the proposal to reduce the max award cap to \$150k with a \$75k per practice cap to further encourage this trend.

Below, we share recommendations based on feedback from those in our network actively implementing HSP and SWEEP projects to ensure that the block grant program successfully empowers grantees to partner with farmers to adopt climate resilient agricultural practices.

Our recommendations suggest ways to support BGRs in running a successful grant program with timely reimbursements for growers, support small-scale and socially-disadvantaged farmers and ranchers, and promote regional collaboration. We look forward to continued collaboration for climate resilient agriculture.

Sincerely,

Anna Larson  
Associate Policy Director  
California Climate and Agriculture Network (CalCAN)

Chelsea Gazillo  
Senior Policy Manager  
American Farmland Trust (AFT)

**Recommendations for HSP and SWEEP Block Grants Draft Application Guidelines, Draft GAP Manual, and Draft Practice Guidelines**

- 1. Further strengthen the Common Objectives and Performance Management Framework (PMF) by disaggregating completion data and providing case study prompts.** As mentioned above, we support the inclusion of a Common Objectives and Performance Management Framework, and we think performance indicators will benefit producers by promoting program quality and identifying areas where BGRs need support or are experiencing challenges. Performance data will also help elucidate whether specific program challenges are outliers or common issues. We also support the inclusion of performance indicators developed by BGRs to meet their local goals, and encourage providing as much flexibility as possible to support BGRs in meeting those goals. We have several suggestions regarding the PMF:
  - First, we suggest disaggregating project completion rate (Objective 6, Performance Indicator 2) by farm size, SDFR status, and primary language to better understand how the program is serving these populations. We do not propose adding this as an indicator of individual BGR success, but rather a metric to track across the program to better understand potential barriers or gaps in service.
  - Second, we suggest that when assessing the performance of BGRs that primarily serve small-scale and/or SDFR farmers, consideration is given that these farmer groups may be more likely to experience delays that impact the percent of projects on-schedule and percent of projects verified complete (Objective 6, Performance Indicators 1 and 2).
  - Third, we suggest that the minimum template includes prompts around environmental and social co-benefits of practice adoption, any cost savings and support for farm viability, and any ways the program(s) helped farmers comply with other regulations such as the Sustainable Groundwater Management Act or Irrigated Lands Regulatory Program if applicable (Objective 8, Deliverable 2).

This information will help communicate program benefits to the legislature, farmers and ranchers, and other stakeholders.

2. **Maintain the new streamlined practice guidelines in the Healthy Soils Practice Guidelines while clarifying components to help block grantees successfully verify practices.** We appreciate and support the streamlined and consolidated HSP Practice Guidelines, along with the phased-in independence in verification to help BGRs learn verification procedures and receive feedback. To support this process, we suggest providing as much specificity while maintaining flexibility in order for block grantees to have assurance their verification materials are acceptable and provide timely reimbursement to farmers. For example, for compost application, the pilot block grant required “3 - 5 geotagged photographs showing compost piles, compost being spread, and ground right after compost is applied.” The new practice guidelines streamline this requirement to “geotagged photos from different locations of the field to demonstrate that the practice is fully implemented in the implementation acreage.” We support the streamlining of these guidelines, but have heard from some in our network that they need sufficient clarity on expectations to ensure that verification documents are acceptable, such as the number of photos and any other details regarding what successful practice implementation requires. We appreciate that the onboarding phase of practice verification will also help clarify this. These clarifications will enhance the ability of Block Grant Recipients to provide timely payments to farmers by ensuring the Healthy Soils Practice application guidelines clearly outline requirements for BGRs.
3. **Consider allowing in-person verification with photographs by an approved Technical Assistance Provider (TAP) as an alternative to geotagged photos.** Many BGRs have experienced challenges using geotagged photos in rural areas, resulting in incorrectly tagged photos or photos without necessary metadata. At the same time, we appreciate that these geotagged photos are an important tool to preserve program integrity and ensure correct practice implementation. To provide additional flexibility while maintaining program integrity, we request that the Department consider allowing TAPs to either verify using geotagged photos, or in lieu of providing geotagged photos, allow the use of non-geotagged photographs in combination with an on-farm verification and attestation by a TAP.
4. **Allow BGRs that primarily serve small-scale and/or SDFR growers to utilize a higher percentage of award funds to support project administration and technical assistance.** BGRs that work with these growers will be managing more contracts with growers that have higher technical assistance needs. This could be accomplished by offering two tiers within the block grant. For example, block grantees that commit to funding small projects under \$XX could be eligible for a lower block grant award size and a higher set aside for technical assistance (thresholds should be determined based on pilot program data and in consultation with BGRs).

5. **Amend the requirement that subaward and contract costs cannot exceed 30% of the Primary Applicant's Project Administrative budget to exclude subawardees.** While we think it is reasonable to cap contract costs to 30% of the Project Administrative budget, we request that subawardees be excluded from this cap. Allowing lead BGRs to partner with other TAPs as subawardees facilitates collaboration and enables BGRs to increase their capacity to cover a larger service area or serve a broader range of grower needs. This type of collaboration has happened successfully in the pilot with multi-TAPs working together on a block grant, but would not be possible with this restriction.
6. **Allow lead BGRs to collaborate with more than two other TAPs as subawardees to facilitate multi-TAP collaborations.** Similar to our reasoning above, we think it is important to allow and encourage collaboration between TAPs on block grants. If there is a 30% cap on contracts and a limit of two subawardees, block grantees will not be able to develop these partnerships.
7. **Amend the \$50,000 cap on Modified Direct Total Costs to only apply to contracts and not subawards.** To support the ability of Lead BGRs to administer the grant in collaboration with close partners as subawardees, we request that the cap on Modified Direct Total Costs eligible for indirect costs of \$50,000 apply only to contracts and not subawards.
8. **Provide additional clarification regarding the Prop 4 bond targets and SDFR set-aside in the application guidelines.** Clarify that vulnerable populations do not need to live in a DAC or SDAC, and that BGRs may meet Target 1 by serving SDFRs.

**Central Sierra Healthy Soils Program**  
11641 Blocker Drive Suite 120  
Auburn, CA  
(530) 390-6680



**To:**  
California Department of Food and Agriculture  
Office of Agricultural Resilience and Sustainability (OARS)  
Attn: HSP & SWEEP Block Grant Public Comments  
Email: [cdfa.oars@cdfa.ca.gov](mailto:cdfa.oars@cdfa.ca.gov)

**From:**  
Brian Pimentel  
Agriculture Program Manager  
Placer Resource Conservation District  
[Brian@placerrcd.org](mailto:Brian@placerrcd.org)

**Re:** Public Comment on Draft Application Guidelines and Draft Grant Award Procedures (GAP) Manual and Healthy Soils Program (HSP) & State Water Efficiency and Enhancement Program (SWEEP) Proposition 4 Climate Bond Funding

Dear California Department of Food and Agriculture,

Thank you for the opportunity to provide public comment on the Block Grant program requirements. We appreciate CDFA's continued efforts to improve program delivery and support effective partnerships with Block Grant Recipients (BGRs). The following comments are organized by topic to support clarity and implementation.

### **Program Timeline and Planning**

We respectfully request that CDFA provide a general timeline outlining the anticipated review process, including key milestones such as the application deadline, estimated review period, and the expected time between submission of the concept proposal and invitation for a full proposal. Access to a clear, high-level timeline would allow organizations to plan staffing capacity, coordinate with project partners, and balance grant development with ongoing operational responsibilities. Greater transparency around scheduling would support more thoughtful and competitive proposals while improving overall program participation and implementation readiness.

### **Financial Administration and Invoice Submission**

We recommend extending the invoice submission window to 60 days following the end of each grant quarter, rather than the currently proposed 30-day deadline. A 30-day turnaround can be challenging for grantees coordinating with multiple contractors and processing a high volume of

invoices, particularly when documentation must be collected, reviewed, and reconciled across several partners. A 60-day submission window would better reflect the administrative realities of grant implementation, reduce the risk of errors or incomplete submissions, and support more accurate and efficient financial reporting without negatively impacting program oversight.

We also request an amendment to the requirement that subaward and contract costs not exceed 30% of the Primary Applicant's Project Administrative budget. Specifically, we recommend excluding subawardees from this cap or increasing the allowable percentage to at least 60%. For BGRs covering large geographic regions, partnerships with subawardees and contractors are essential to effective program delivery. In our current block grant covering 8 counties in a diverse agricultural landscape, approximately 50% of administrative and technical assistance funds are allocated to partners and contractors, reflecting the practical need for regional collaboration. Increasing flexibility in this requirement would better align with CDFA's encouragement of partnerships and enable BGRs to successfully implement projects across multiple counties and agricultural operations.

Additionally, we request an amendment to the \$50,000 cap on Modified Direct Total Costs so that it applies only to contracts and not to subawards. To support Lead BGRs in administering grants collaboratively with close implementation partners, it is important that subaward structures remain financially viable. Limiting indirect cost recovery on subawards constrains the ability of Lead BGRs to effectively coordinate and manage complex, partnership-based projects. Applying the \$50,000 cap only to contracts would better support collaborative grant administration while maintaining appropriate fiscal controls.

### **Practice Funding Caps**

We request that CDFA increase the current \$75,000 cap per practice to at least \$100,000. The existing cap can significantly limit the number of acres that producers are able to implement, particularly for higher-cost practices such as compost application. Raising the cap would allow projects to achieve more meaningful scale and environmental impact while better aligning funding with real-world implementation costs. An increased cap would also complement and improve the distribution of funding when paired with related practices such as rangeland planting, cover cropping, reduced or no-till systems, and other three-year conservation practices supporting more integrated and effective soil health management.

### **Verification Standards and Reimbursement Processes**

We appreciate and support the proposal to phase in greater independence in project verification for BGRs, as this approach can help accelerate farmer reimbursement while maintaining appropriate verification standards. To help mitigate financial risk when using advance payments from CDFA to reimburse growers, we request that the Practice Guidelines clearly define the specific requirements farmers must meet to be eligible for reimbursement. For example, current HSP Practice Guidelines contain ambiguity around items such as the number of geotagged

photos required for verification and the percentage of perennial species needed for rangeland planting. Establishing clear, consistent verification thresholds would give BGRs greater confidence in reimbursing farmers and reduce the financial risk associated with uncertain eligibility requirements.

We would also like to highlight a persistent challenge that we and other BGRs experience with the requirement for geotagged photos in rural areas. Third-party applications and mobile phone geotagging often produce inaccurate locations or fail to reliably transfer metadata, resulting in significant administrative time spent troubleshooting and correcting errors using limited and inefficient verification methods. To address this, we respectfully request that CDFA allow qualified BGR staff to rely primarily on in-person farm verifications, consistent with practices already used by other conservation partners, while still requiring standard photographic documentation. We ask that the specific requirement for geotagged photos be reconsidered or that flexibility be provided when needed, given the demonstrated inaccuracies and administrative burden associated with confirming photo geolocation.

We appreciate CDFA OARS' commitment to strengthening program delivery and improving outcomes for producers across California. We hope these recommendations are helpful and look forward to continued collaboration in advancing resilient agricultural systems.

Respectfully,

Central Sierra Healthy Soils Program



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*75 Years of Helping People Help the Land*

**To:**

California Department of Food and Agriculture  
Office of Agricultural Resilience and Sustainability (OARS)  
Attn: HSP & SWEEP Block Grant Public Comments  
Email: [cdfa.oars@cdfa.ca.gov](mailto:cdfa.oars@cdfa.ca.gov)

**From:**

Brian Pimentel  
Agriculture Program Manager  
Placer Resource Conservation District  
[Brian@placerrcd.org](mailto:Brian@placerrcd.org)

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Collaboration

Creativity

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Integrity

Transparency

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### **Indirect Cost Recovery**

We request that CDFA include the full menu of indirect rate options as authorized in statute across all Proposition 4 programs. Funders should avoid “reinventing the wheel” by prescribing only certain allowable cost recovery methods or disallowing expenses included in previously negotiated state-approved rates.

Indirect cost recovery methods are already established, reviewed, and approved by the Department of Financial Services. Creating new or inconsistent requirements introduces unnecessary administrative burden and uncertainty. Additionally, proposal evaluation criteria should avoid disadvantaging RCDs and other grantees that request well-justified, transparent, and accountable indirect rates that accurately reflect their true operational costs.

We appreciate CDFA OARS’ commitment to strengthening program delivery and improving outcomes for producers across California. We hope these recommendations are helpful and look forward to continued collaboration in advancing resilient agricultural systems.

Respectfully,

Brian Pimentel  
Agriculture Program Manager  
Placer Resource Conservation District



## CALIFORNIA LAND STEWARDSHIP INSTITUTE

550 GATEWAY DRIVE #104, NAPA, CA, 94558

**February 18, 2026**

**To: California Department of Food & Agriculture**

**Re: Public Comment on Proposed Revisions to the Climate Bond Block Grant Guidelines and Grant Administration and Procedures (GAP) Manual**

The California Land Stewardship Institute (CLSI) appreciates the opportunity to provide public comment on the proposed revisions to the Climate Bond Block Grant Program Guidelines and the Grant Administration and Procedures (GAP) Manual. Additionally, we have added notes on the new HSP practice guidelines. We recognize CDFA's continued efforts to strengthen program clarity, expand training resources, and improve administrative processes. The following comments presented below are aimed at supporting ongoing improvements to program accessibility, transparency, and implementation success.

### **I. Climate Bond Block Grant Program Guidelines**

#### **1. Invoicing and Reimbursement Updates**

We support the transition from a three-month to a one-month invoice submission timeline. This revision is consistent with past Block Grant Recipient (BGR) feedback, and we expect it to improve grant administration and cash-flow management, allowing for more timely reimbursement to our growers.

#### **2. Mandatory In-Person Two-Day Onboarding**

We are excited about the implementation of a mandatory in-person onboarding meeting. We believe this will help support BGR success during early program implementation and reduce delays in project verification. To further support BGRs, we suggest that CDFA:

- Provide virtual participation options for additional staff outside of the mandatory in-person attendance.
- Make training materials and/or recordings of the training available to BGRs following the onboarding and throughout the grant term.

#### **3. Trainings, Office Hours, and Meeting Documentation**

CLSI appreciates the expansion of training opportunities provided by CDFA, including topical trainings and remedial support. We also value the continuation of one-on-one monthly meetings, which we have found very beneficial. We recommend that CDFA consider:

- Recording all trainings and office hours to allow BGRs to reference again as needed.
- Providing written summaries or meeting notes following office hours when recordings are unavailable or when policy updates or program decisions are discussed.
- Establishing guidance describing how verification requirements may be modified during the grant term and outlining procedures for communicating these updates to all Block Grant Recipients. We found these modifications often occurred during office hours, thus having written documentation and recordings would be useful.

#### 4. Website Requirement

CLSI supports the goal of improving public transparency through the requirement for a dedicated program webpage or website. We would appreciate clarification on the following:

- Whether website development costs, separate from hosting expenses, are considered allowable administrative costs.
- Whether consultant services related to website or webpage development are eligible for reimbursement.

## **II. Grant Administration and Procedures (GAP) Manual**

### 1. Advance Payment, Budget, and Invoicing Clarity

We ask that CDFA consider the impact of the proposed Technical Assistance/Administrative cap at 20 percent. The reduction of Healthy Soils Program administrative funding from 25 percent in prior Block Grant cycles to the proposed 20 percent may limit available capacity for project management, grower support, and grant oversight. We encourage CDFA to evaluate whether maintaining a 25 percent combined cap would better support program implementation and appreciate the additional clarification provided regarding advance payment timelines and procedures.

### 2. Third-Party Vendor Restrictions

Additional clarification regarding third-party vendor definitions and reimbursement eligibility, particularly for vineyard or farm management companies, would be helpful. Many of our growers utilize third-party management entities to implement and report practices and are often listed as alternate contacts. Clearer guidance would assist BGRs in selecting appropriate projects and administering reimbursements consistently.

### 3. On-Farm Project Modifications and Terminations

We strongly recommend the development of formal guidance addressing procedures for terminating on-farm projects, including documentation requirements, allowable uses of unspent funds, and reporting responsibilities for BGRs.

For on-farm project modifications, we ask for clarification on whether cost-share-based budget increases remain allowable when growers incur additional project expenses beyond initial estimates. With the understanding of the limitation of modifications already in place.

### **III. Healthy Soils Program Practice Guidelines**

#### **1. Biochar – New Practice**

We are excited for the new addition of biochar as an eligible practice and look forward to additional information regarding United States Biochar Initiative training availability and associated costs.

#### **2. Mulching – Off-Site Production Requirement**

CLSI requests expanding the limiting eligibility of only allowing off-site mulch or woodchip production. On-farm mulch production can support diversified agroecosystem management, promote carbon sequestration, and incentivize stewardship of riparian areas and perennial woody vegetation. We would appreciate CDFA to consider allowing on-farm production for projects that are consistent with program objectives and verification requirements.

#### **3. Reimbursement for Unsuccessful Implementation**

We ask that CDFA consider establishing contingency guidance for good-faith implementation efforts. In our experience, we have helped multiple growers who fully implement required protocols but were unable to achieve performance outcomes due to circumstances beyond their control, such as abnormal weather events. This issue is particularly significant for low-resource growers and Socially Disadvantaged and Small-Scale Producers, who may face substantial financial risk when adopting new conservation practices.

CLSI appreciates CDFA’s commitment to program improvements for HSP and SWEEP and we look forward to continued collaboration in supporting climate-smart agricultural practices across California. Thank you for the opportunity to provide these comments.

Sincerely,

#### **California Land Stewardship Institute**

**Chelsea Jimenez**

Director of Specialty Projects & Research

**Marita Oneto**

Director of Operations

**Connor Bennett**

Director of Certification and Climate Programs

**Chris Kelley**

Executive Director

**Rebeckah Rubanowitz**

Program Manager

**Natalie Reed**

Program Manager



February 18, 2026

BY EMAIL: [secretary.ross@cdfa.ca.gov](mailto:secretary.ross@cdfa.ca.gov) &  
[cdfa.oars@cdfa.ca.gov](mailto:cdfa.oars@cdfa.ca.gov)

Secretary Karen Ross  
California Department of Food and Agriculture  
1220 N Street, Suite 400  
Sacramento, CA 95814

RE: Request for Applications (RFA) for the upcoming SWEEP Block Grant Program

Dear Secretary Ross and Program Leadership,

On behalf of our organization and the farmers and ranchers we serve, I am writing to express our concern regarding the proposed eligibility changes to the California Department of Food and Agriculture's block grant program. We understand and appreciate CDFA's continued commitment to supporting agricultural producers across California. However, the proposed change to limit eligibility to Resource Conservation Districts (RCDs) and 501(c)(3) organizations — thereby excluding 501(c)(5) nonprofit organizations — will have significant unintended consequences. Specifically, this change eliminates the ability for many County Farm Bureaus to apply for funding under the program.

County Farm Bureaus have long served as trusted, locally grounded partners in delivering education, outreach, and program implementation to farmers and ranchers. Excluding 501(c)(5) organizations reduces the number of experienced entities capable of effectively administering grant funds, and in turn limits funding access and program delivery opportunities for agricultural producers throughout the state. This restriction may disproportionately impact rural communities where Farm Bureaus are often the primary agricultural support organizations. Limiting eligibility narrows the pool of applicants and may reduce regional equity, innovation, and producer participation.



We respectfully request that CDFA reconsider this eligibility modification or explore mechanisms that would continue to allow qualified 501(c)(5) agricultural organizations to participate. Maintaining inclusive eligibility criteria will help ensure that funding reaches farmers and ranchers efficiently and equitably. I appreciate the opportunity to provide feedback and would welcome further discussion on how CDFA can preserve strong local partnerships while meeting program objectives.

Thank you for your time and consideration.

A handwritten signature in black ink, appearing to read 'Chris Reardon'. The signature is fluid and cursive, with a long horizontal stroke at the end.

Sincerely,  
Chris Reardon  
Vice President, Policy Advocacy  
California Farm Bureau

17 February 2026

To the CDFA Office of Agricultural Resilience and Sustainability,

Thank you for the opportunity to comment on the Draft Application Guidelines and Grant Award Procedures Manual for the Healthy Soils Program and State Water Efficiency and Enhancement Program Block Grants. We are researchers at Stanford University's Doerr School of Sustainability and have worked on developing data-driven approaches that aim to inform sustainable agricultural management in California. We have recently evaluated the environmental outcomes of both the SWEEP and HSP programs.<sup>1</sup> Based on our study's findings, we would like to offer three recommendations that would strengthen future monitoring and evaluation in support of program goals, as detailed below.

- 1) **Data collection and standardization for program monitoring and evaluation:** We recommend that all block grant recipients track and record data in a consistent manner using a standardized form provided by OARS across all parcels that receive grants.
  - a) This standardized dataset is recommended to include:
    - i) A unique identification code for each block grant recipient. Each parcel receiving funding within each block grant should also be assigned a separate identification code. All subsequent data collection should be associated with these identification codes.
    - ii) Coordinates of the centroids of each parcel receiving a grant (latitude and longitude, separately), with individual entries if more than one parcel will be implementing the supported practice. If geospatial expertise is available, shapefile polygons of the parcel area implementing a funded practice should also be collected.
    - iii) Standardized records of the funded practice type, particularly for SWEEP. Similar to HSP practice codes, there should be designated SWEEP codes that are used for each common practice intervention. For example: Switch from Flood to Drip (1A) Switch from Flood to Sprinkler (1B), Sensor System (2A), Pump Upgrade (3A). We recommend collecting these codes separately from the written description of the project plan.
    - iv) Crop type information (using a standardized format such as using crop type codes), water use, and crop yield should be collected and stored in the same units and format. We acknowledge that some of these data may be unavailable for public records access due to privacy concerns but recommend that this data still be collected, when possible, in a consistent and organized manner so internal monitoring and analysis can be performed.
- 2) **Funding caps and technical assistance for irrigation scheduling and soil moisture sensors:** The draft application guidelines detail that there can be no more than 40% spent on solar and no more than 40% on irrigation water management. Regarding irrigation water management funding, we recommend greater oversight, consideration of funding caps, and increased technical assistance for irrigation scheduling and soil moisture sensor specific grants.

- a) Our analysis of SWEEP soil moisture sensors and irrigation scheduling grants indicate that there is increased evapotranspiration following implementation of soil moisture sensors and irrigation scheduling tools.<sup>1</sup> Aligning with the recommendations from a 2024 analysis by Cal Poly San Luis Obispo,<sup>3</sup> we recommend considering capping sensor funding, increasing technical assistance, and increasing oversight of irrigation scheduling systems and sensors implementation to ensure water reduction goals can be met.
- 3) **Integration of field-level data on crop water efficiency for improved prioritization:** We recommend the integration of field-level information available from satellite datasets to improve program evaluation and outreach. We developed an approach that uses publicly available data to calculate potential water savings at the field scale using locally observed crop water productivity values.<sup>2</sup> While the published study focused on almonds, grapes, walnuts, and citrus in San Joaquin Valley's critically overdrafted basins, these approaches could be extended to specific regions and crop types of interest. Incorporating this type of information could facilitate the evaluation, screening, and prioritization of fields with high potential for improving crop water efficiency. We also would like to acknowledge that our work<sup>1,2</sup> relies on the OpenET ensemble dataset,<sup>4</sup> and we recommend a careful consideration of local accuracy with these data before use in decision-making.

Thank you for your consideration of these recommendations.

Sincerely,

Corisa A. Wong

Stanford University, Department of Civil and Environmental Engineering

Dr. Meagan S. Mauter

Stanford University, Department of Civil and Environmental Engineering

Dr. David B. Lobell

Stanford University, Department of Earth Systems Science

## References

[1] Wong, C. A.; Abramson Sklarin, W. S.; Mauter, M. S.; Lobell, D. B. Measuring Impacts of California Agri-Environmental Programs Using Field-Scale Satellite Data. *Environ. Res. Lett.* **2026**, *21* (1), 014006.

<https://doi.org/10.1088/1748-9326/ae2ca6>.

[2] Wong, C. A.; Lobell, D. B.; Mauter, M. S. Field-Scale Mapping of California Crop Water Productivity to Inform Water Management in Critically Overdrafted Groundwater Basins. *Environ. Res. Lett.* **2025**, *20* (7), 074034.

<https://doi.org/10.1088/1748-9326/add6b8>.

[3] Babin, N.; Tan, J.; Church, S. P.; Radulski, B. Evaluation of the California Department of Food and Agriculture's Climate-Smart Incentive Programs: Final Report. *Final Report* **2024**.

[4] Melton, F. S.; Huntington, J.; Grimm, R.; Herring, J.; Hall, M.; Rollison, D.; Erickson, T.; Allen, R.; Anderson, M.; Fisher, J. B.; Kilic, A.; Senay, G. B.; Volk, J.; Hain, C.; Johnson, L.; Ruhoff, A.; Blankenau, P.; Bromley, M.; Carrara, W.; Daudert, B.; Doherty, C.; Dunkerly, C.; Friedrichs, M.; Guzman, A.; Halverson, G.; Hansen, J.; Harding, J.; Kang, Y.; Ketchum, D.; Minor, B.; Morton, C.; Ortega-Salazar, S.; Ott, T.; Ozdogan, M.; ReVelle, P. M.; Schull, M.; Wang, C.; Yang, Y.; Anderson, R. G. OpenET: Filling a Critical Data Gap in Water Management for the Western United States. *J American Water Resour Assoc* 2022, *58* (6), 971–994.

<https://doi.org/10.1111/1752-1688.12956>.



California State University **Chico**  
Center for Regenerative  
Agriculture and  
Resilient Systems

February 15, 2026

Secretary Karen Ross  
California Department of Food and Agriculture  
1220 N Street  
Sacramento, CA 95814

**Re: Public Comment on the Healthy Soils Program Research Solicitation –  
Request for Addition of a Funding Category for GHG Reduction and Carbon  
Sequestration Decision-Support Tools**

**Dear Secretary Ross,**

Thank you for the opportunity to provide public comment on the forthcoming Healthy Soils Program (HSP) solicitation. We value your leadership in collecting public comments and working to be fully inclusive of California's diverse agriculture systems.

The California Department of Food and Agriculture (CDFA) has played a pivotal role in advancing climate-smart agriculture, an initiative you led, and the Healthy Soils Program remains one of the state's most effective mechanisms for supporting growers in adopting practices that enhance soil carbon, reduce greenhouse gas (GHG) emissions, and build long-term agricultural resilience.

As CDFA prepares the next round of HSP research funding, I respectfully urge the Department to address a critical gap in the current solicitation structure. While the two existing research categories support valuable scientific inquiry and field-based trials, including outreach and education opportunities to farmers and ranchers, they do not provide a pathway to fund the development, refinement, or deployment of GHG reduction and carbon sequestration decision-support tools. These tools are essential for translating research into practical, field-level decisions that growers and technical assistance providers (TAPs) must make when evaluating HSP-eligible practices.

**Request**

On behalf of the California State University Center for Regenerative Agriculture, we respectfully ask you to consider adding a third funding category dedicated

## Re: Public Comment on the Healthy Soils Program Research Solicitation – Request for Addition of a Funding Category for GHG Reduction and Carbon Sequestration Decision Support Tools

to the development, improvement, or implementation of GHG reduction and carbon sequestration decision-support tools for growers and technical assistance providers, with a maximum funding limit of \$80,000 per project over a funding duration of one to two years.

This category would fill a major gap in the current solicitation and would directly support the state's climate goals by enabling growers to make informed, data-driven decisions about soil-health practices.

### **Why This Funding Category Is Essential**

#### 1. Growers Need Practical, Field-Specific Guidance

California's agricultural landscapes are extraordinarily diverse. Soil types, microclimates, cropping systems, and management histories vary widely, making it difficult for growers to determine which practices will deliver the greatest carbon benefits on their specific fields. Decision-support tools bridge this gap by:

- Translating research findings into actionable recommendations
- Allowing growers to compare multiple practices and scenarios
- Reducing uncertainty and risk associated with adopting new practices
- Supporting long-term planning for soil carbon and GHG reductions

Without such tools, growers—especially small and mid-scale producers—face significant barriers to participating in HSP.

#### 2. Technical Assistance Providers (TAPs) success of HSP. They help growers evaluate practices, estimate carbon benefits, and prepare competitive applications. However:

- Existing tools are limited in scope
- Many are outdated or do not reflect the latest research
- Few tools integrate California-specific data
- TAPs often rely on manual calculations or fragmented resources

A dedicated funding category would allow TAPs to access modern, scientifically grounded tools that improve the quality and consistency of technical assistance statewide.

#### 3. California's Climate Goals Depend on Scalable, User-Friendly Tools

The state's climate strategy calls for rapid expansion of carbon-sequestering agricultural practices. Achieving this requires tools that:

- Are accessible to growers of all scales
- Provide transparent, science-based estimates
- Support long-term monitoring and adaptive management
- Integrate with existing CDFA programs and reporting systems

Investing in decision-support tools is one of the most cost-effective ways to accelerate adoption of climate-smart practices.

Re: Public Comment on the Healthy Soils Program Research Solicitation – Request for Addition of a Funding Category for GHG Reduction and Carbon Sequestration Decision Support Tools

### **Outcomes**

Compared to large research projects, decision-support tools require relatively small investments but deliver outsized benefits:

- They could improve the quality of HSP applications since some decision support tools are more detailed than Comet-Planner
- They increase grower participation
- They enhance the accuracy of GHG reduction estimates
- They strengthen the connection between research and practice
- They support equitable access to climate-smart agriculture

### **Conclusion**

We at the Center for Regenerative Agriculture at CSU Chico, respectfully urge you and the Department to please consider incorporating a third funding category in the upcoming HSP research solicitation dedicated to GHG reduction and carbon sequestration decision-support tools, with a maximum award of \$80,000. This addition would directly support growers, strengthen technical assistance capacity, and accelerate California's progress toward its climate and soil-health goals.

Thank you for your consideration and for your continued leadership in advancing soil health and climate resilience in California agriculture. Please do not hesitate to contact me if you have any questions, and thank you again for your continued leadership on all things that are California agriculture.

Sincerely,

  
Cynthia Daley (Feb 18, 2026 14:08:36 HST)

Cynthia A. Daley, Ph.D.  
Director, Center for Regenerative Agriculture & Resilient Systems  
CSU Chico ARI Campus Coordinator  
Professor – College of Agriculture  
Phone: (530) 898-3332  
Email: cdaley@csuchico.edu

**From:** Daniel Hoffman <danielh@ncat.org>

**Sent:** Wednesday, February 18, 2026 10:14 PM

**To:** CDFA Healthy Soil Program\_Technician@CDFA <cdfa.HSP\_Tech@cdfa.ca.gov>

**Cc:** California Staff <calstaff@ncat.org>

**Subject:** Healthy Soil Questions and Public Comments

Hello,

I would like to please submit two questions and three public comments for the Healthy Soils Program Block Grant.

Questions:

1. Will the CDFA Healthy Soils Block grant accept an organization's existing Federal Negotiated Indirect Coast Rate (NICRA)?
2. When calculating the Project Administration Budget, will staff time and travel supporting farmers applying for funding and providing technical assistance for implementation count as "on-farm project costs"?

Public comments:

1. The Healthy Soils funding for many practices including cover crops, hedgerows, and compost is scalable, which favors larger farming operations. One way to support smaller scale, underserved and socially disadvantaged farmers would be to offer payment rates on a sliding scale with higher payments for smaller acreages. For example, cover crop payments at a higher rate for 0-5 acres, a different rate for 5-10 acres, a different rate for 10-20 acres, and so on. In particular, cover crop payments and reduced tillage payment rates are currently not competitive for smaller scale farmers, reducing adoption and favoring larger operations.
2. Payments for Healthy Soil practices as reimbursements favor larger farmers with more cash reserves. Many small scale and socially disadvantaged farmers do not have upfront funds for healthy soil practices, limiting adoption. Providing funding in advance instead of reimbursing costs for small scale and socially disadvantaged farmers is an equitable solution.
3. It takes proportionally more time to serve small scale farmers than large scale farmers farming on the same acreage. To encourage support for small scale, underresourced and socially disadvantaged farmers, CDFA could allow a Project Administration Budget that is a greater percentage of the total grant for applicants

that use a majority (80%) of the awarded funds for technical assistance expenses to provide technical assistance to socially disadvantaged farmers or ranchers

Thank you very much!

Daniel

**DANIEL HOFFMAN**

*(Pronouns: he/él)*

Sustainable Agriculture Specialist

National Center for Appropriate Technology

[NCAT.ORG](http://NCAT.ORG)

C: 303-253-1536

From: Ellen Way <nuts4ag@icloud.com>  
Sent on: Tuesday, February 10, 2026 4:15:23 AM  
To: CDFA Agricultural Resilience & Sustainability Office@CDFA <cdfa.oars@cdfa.ca.gov>  
Subject: SWEEP/Healthy Soils Grant RFA Comments  
From: Ellen Way <nuts4ag@icloud.com>

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## Sanders Family Farms

Cell: (760) 831-4233

Nuts4ag@icloud.com

February 5, 2026

California Department of Food and Agriculture (CDFA)  
Office of Agricultural Resilience and Sustainability (OARS)

RE: Public Comment – Draft Request for Applications (RFA)  
SWEEP Block Grant Program (Climate Bond Block Grant Application Guidelines)

To CDFA/OARS Staff:

Thank you for the opportunity to provide comments on the Draft Request for Applications (RFA) for the upcoming SWEEP and Healthy Soils Block Grant programs. I farm almonds in Stanislaus County, and also work for other farmers and have helped them manage SWEEP and Healthy Soils grants.

I understand the new proposal requires the grant funding be awarded only to block grant recipients and not directly to farmers. My local Farm Bureau would like to apply for funding that can then be awarded to local farmers, but to do so, CDFA will have to revise the RFA to include 501©5 organizations. If agricultural organizations are not allowed to apply for this funding, I worry farmers will be denied an opportunity to participate. I am writing to urge your approval of this revision.

In addition, we need guidelines that are flexible in considering diverse hydrologic and operational situations. Every farm in California deals with different environmental conditions. Farmers learn to adapt to the volatility of weather patterns and environmental changes. In order for SWEEP grants to be implemented successfully, the guidelines must allow for this diversity.

California is the largest and most productive agricultural state in the US. Every day it gets more difficult and expensive to grow the safe and nutritious fresh fruits and vegetables Americans depend upon. California farmers are governed by the strictest laws in the world, and we need our government to invest in us so we can take care of the environment that allows us to be the largest farming state.

Americans want their food grown according to a set of values; grow safe, healthy food, use environmental resources wisely, and take care of employees. To do this, we have to have a market for our products that sustains these values. The SWEEP and Healthy Soils grants are great opportunities for

California to invest in agriculture so we can maintain these values and continue to feed America for many years to come.

Thank you for considering my comments.

Kindest Regards,

A handwritten signature in black ink, appearing to read "Ellen Sanders Way", with a long horizontal flourish extending to the right.

Ellen Sanders Way  
Sanders Family Farms  
Stanislaus County/Riverside County



# Napachar

*eric@napachar.com*  
(707) 492-5652

February 18th, 2026

Comment on 2026 Healthy Soils Program Application Guidelines - Biochar Provisions

To: Office of Agricultural Resilience and Sustainability (OARS)  
California Department of Food and Agriculture

Dear OARS,

Thank you for the opportunity to comment on the 2026 Healthy Soils Program Application Guidelines. I am very excited to see the inclusion of biochar in the provisions for the first time. And I hope that my comments below can help steer these guidelines toward a practice that encourages farmers throughout the state to incorporate this ancient and natural form of organic carbon in their soil. Specifically, I am recommending that the guidelines be amended to explicitly permit biochar made-on-site from wood grown-on-site using flame-cap kilns or other flame-carbonizing technologies.

I am writing as the owner of a mobile biochar-production company, servicing the vineyards of Napa and Sonoma County. Our model at Napachar is to bring our portable flame-cap kilns directly to clients who have waste wood (grapevines, orchard prunings, forestry slash) and who want biochar for their soil. Since our founding in 2022, we have documented production of more than 800 cubic yards (130 dry tons, 260 wet tons) of biochar produced in 150 different locations.

Biochar is a heterogenous product, with its qualities dependent both on the feedstock and the technology. I therefore agree wholeheartedly with the focus on ensuring that any biochar used in this program is safe for the soil. However, when considering biochar produced from raw wood grown on site using flame-cap kilns, the dangers are minimal. Because flame-cap kilns pyrolyze the feedstock beneath open flames, with adiabatic heat approaching 2000°C, the biochar is necessarily formed at too high a temperature to contain dioxins, which break down above 400°C. Indeed, we consistently observe pyrolytic temperatures above 800°C in our kilns. And because the syngasses are flared in the flame-cap, above the biochar, it is not possible for carcinogenic PAHs to

condense on the finished biochar. Finally, because the feedstock is raw wood grown on site, there is no possibility of importing foreign toxins or heavy metals.

In fact, the biochar produced by flame-cap kilns is reliably a high quality woody biochar, with high carbon content and low H:C ratios, indicating that it will make a permanent addition to the organic carbon fraction of any healthy soil. Attached to this letter are lab results from 23 randomly selected batches of Napachar's 2024-2025 season which demonstrate an average carbon content of almost 83% and average H:C ratio of 0.31.

For much more information on flame cap kilns and other flame-carbonizing technologies, see:

Wilson, Kelpie, et al. "Mobile biochar production by flame carbonization: Reducing wildfire risk and improving forest resilience." *Gen. Tech. Rep. RMRS-GTR-439*. Fort Collins, CO: US Department of Agriculture, Rocky Mountain Research Station. 91 pp. <https://doi.org/10.2737/RMRS-GTR-439>. 439 (2024).

Not only do we make great biochar for our clients, but we also avoid significant emissions. The alternative fate of the wood we process is either pile-burning or wood-chipping, which both result in >99% of the carbon within the wood returning to the atmosphere, either right away from a burn pile, or over the next decade as microbes break down the wood chips. When we instead produce biochar from the wood and leave it with the client for incorporation in the soil, we permanently sequester a significant fraction (up to 50%) of the carbon as a component of healthy soils. To this end, the biochar we make is eligible for Carbon Dioxide Removal (CDR) credits, and indeed Napachar is currently in the process of certifying the sequestration associated with our 2024-2025 season with the Climate Action Reserve.

The benefits of encouraging the practice of on-site biochar production as a part of the Healthy Soils Program therefore include:

Benefits to the farm (lower inputs, lower emissions, recycling nutrients, circularity, healthier soils)

Benefits to the community (lower process emissions, lower transportation emissions, local employment, restoring local water and nutrient cycles)

Benefits to the planet (carbon sequestration)

Finally, OARS does not need to reinvent the wheel when including on-site biochar production in this practice. There is already an established USDA practice for on-site biochar production, NRCS 384A, that OARS can use as a model:

<https://www.nrcs.usda.gov/programs-initiatives/csp-conservation-stewardship-program/biochar-production-from-woody-residue>

And a published protocol for documenting the biochar produced using flame cap kilns:

Wilson, Kelpie J., Wihan Bekker, and Stephen I. Feher. "Producing, Characterizing and Quantifying Biochar in the Woods Using Portable Flame Cap Kilns." *J. Vis. Exp* 203 (2024): e65543.

Again, I want to applaud the OARS for including biochar in the 2026 HSP Guidelines, and I hope that my comments will help to encourage farmers throughout the state to discover the magic of biochar.

Napachar



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(Eric Mayer)

02 / 18 / 2026

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Date



# Control Laboratories

42 Hangar Way  
Watsonville, CA 95076  
www.biocharlab.com  
Tel: 831 724-5422  
Fax: 831 724-3188

Account No.:  
11994  
Batch:  
OCT 25 D  
CODE:  
Custom Analysis

Eric Mayer  
Napachar  
170 France Street  
Sonoma, CA 95476

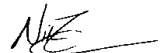
Date Received: 10/20/2025  
Sample ID: Organic C and H/C Samples  
Lab ID Number: 5100258

## Custom Analysis

Lab ID	Sample ID	Total C %	C <sub>org</sub> %	H/C <sub>org</sub>
5100258-01	1	80.7	80.0	0.26
5100258-02	2	81.1	80.5	0.32
5100258-03	3	78.1	77.2	0.29
5100258-04	4	81.8	81.1	0.24
5100258-05	5	84.9	84.5	0.27
5100258-06	6	83.0	82.5	0.29
5100258-07	7	86.9	86.6	0.20
5100258-08	8	86.3	85.9	0.29
5100258-09	9	78.5	78.2	0.36
5100258-10	10	81.7	81.2	0.36
5100258-11	11	84.1	83.6	0.38
5100258-12	12	82.2	81.7	0.31
5100258-13	13	82.3	81.5	0.33
5100258-14	14	85.3	84.9	0.35
5100258-15	15	80.9	80.3	0.33
5100258-16	16	85.1	84.6	0.29
5100258-17	17	86.9	86.6	0.29
5100258-18	18	85.3	84.8	0.30
5100258-19	19	82.9	82.1	0.30
5100258-20	20	86.2	85.8	0.27
5100258-21	21	85.0	84.7	0.26
5100258-22	22	82.2	81.7	0.37
5100258-23	23	83.3	82.9	0.36

Methods: Dry Combustion  
ASTM D-4373

Analyst: Nik Zumberge



# Control Laboratories

42 Hangar Way  
 Watsonville, CA 95076  
 www.biocharlab.com  
 Tel: 831 724-5422  
 Fax: 831 724-3188

Account No:  
 11994  
 Batch:  
 OCT 25 D  
 CODE:  
 BioChar IBI

Eric Mayer  
 Napachar  
 170 France Street  
 Sonoma, CA 95476

Date Received: 10/20/2025  
 Sample ID: IBI Sample  
 Lab ID. Number: 5100258-24

### International BioChar Initiative (IBI) Laboratory Tests for Certification Program

	Dry Basis Unless Stated: Range	Units	Method
Moisture (time of analysis)	54.5	% wet wt.	ASTM D1762-84 (105c)
Bulk Density	13.0	lb/cu ft	
Organic Carbon	84.1	% of total dry mass	Dry Combust-ASTM D 4373
Hydrogen/Carbon (H:C)	0.29 0.7 Max	Molar Ratio	H dry combustion/C(above)
Total Ash	8.9	% of total dry mass	ASTM D-1762-84
Total Nitrogen	0.81	% of total dry mass	Dry Combustion
pH value	8.52	units	TMECC (2001) 4.11, 1:20 dilution
Electrical Conductivity (EC20 w/w)	0.470	dS/m	TMECC (2001) 4.10, 1:20 dilution
Liming (neut. Value as-CaCO3)	11.3	%CaCO3	AOAC 955.01
Carbonates (as-CaCO3)	2.0	%CaCO3	ASTM D 4373
Butane Act.	4.4	g/100g dry	ASTM D 5742-95
Surface Area Correlation	272	m2/g dry	G

All units mg/kg dry unless stated:		Range of		Reporting		Particle Size Distribution		
	Results	Max. Levels	Limit (ppm)	Method	Results	Units	Method	
Arsenic (As)	ND	13 to 100	0.88	J	< 0.5mm	3.2 percent	F	
Cadmium (Cd)	ND	1.4 to 39	0.35	J	0.5-1mm	0.2 percent	F	
Chromium (Cr)	70.2	93 to 1200	0.88	J	1-2mm	0.2 percent	F	
Cobalt (Co)	1.3	34 to 100	0.88	J	2-4mm	0.3 percent	F	
Copper (Cu)	18.3	143 to 6000	0.88	J	4-8mm	5.6 percent	F	
Lead (Pb)	1.4	121 to 300	0.35	J	8-16mm	43.7 percent	F	
Molybdenum (Mo)	ND	5 to 75	0.88	J	16-25mm	46.9 percent	F	
Mercury (Hg)	ND	1 to 17	0.015	EPA 7471	25-50mm	0.0 percent	F	
Nickel (Ni)	26.1	47 to 420	0.88	J	>50mm	0.0 percent	F	
Selenium (Se)	ND	2 to 200	1.76	J	Basic Soil Enhancement Properties			
Zinc (Zn)	50.3	416 to 7400	1.76	J	Total (Ca)	21313 mg/kg	E	
Boron (B)	29.9	Declaration	8.8	TMECC	Total (Mg)	4413 mg/kg	E	
Chlorine (Cl)	63.6	Declaration	20.0	TMECC	Total (K)	11200 mg/kg	E	
Sodium (Na)	ND	Declaration	881	E	Total (P)	1892 mg/kg	E	
Iron (Fe)	804	Declaration	44.1	E	Ammonia (NH4-N)	37.9 mg/kg	A	
Manganese (Mn)	193	Declaration	0.88	J	Nitrate (NO3-N)	4.0 mg/kg	A	
					Organic (Org-N)	8008 mg/kg	Calc.	
					Volatile Matter	11.5 percent dw	D	

\* "ND" stands for "not detected" which means the result is below the reporting limit.

Method A Rayment & Higginson  
 D ASTM D1762-84  
 E EPA3050B/EPA 6010  
 F ASTM D 2862 Granular

G Butane Activity Surface Area Correlation Based on McLaughlin, Shields, Jagiello, & Thiele's 2012 paper: Analytical Options for Biochar Adsorption and Surface Area  
 J EPA3050B/EPA 6020

Analyst: Nik Zumberge



**From:** Mary J Gonzalez <maryj.gonzalez@fresnounified.org>  
**Sent on:** Wednesday, January 21, 2026 7:31:47 PM  
**To:** CDFA Agricultural Resilience & Sustainability Office@CDFA <cdfa.oars@cdfa.ca.gov>  
**Subject:** Request: CDFA Opens Public Comment on Healthy Soils Program and State Water Efficiency and Enhancement Program Guidelines  
**Attachments:** FUSD Ag Farm Academy - CDFA 1.21.2026.pdf (116.45 KB)

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Greetings OARS –

Thank you for sending this information. I have been exploring the program opportunities through your office.

Fresno Unified School District is developing a project that will provide career training to students working with the agricultural industry to advance climate smart sustainable agricultural practices.

May I request your review of the attached project summary for feedback? I am hoping our project may be good to apply to one of your sustainability grant programs.

Thank you for your technical guidance, if possible. Many warm regards, Mary

Mary J. Gonzalez  
Facilities Management & Planning  
Fresno Unified School District  
O: (559) 457-3997  
M: (559) 356-1065  
E: [maryj.gonzalez@fresnounified.org](mailto:maryj.gonzalez@fresnounified.org)

## **Fresno Unified School District**

Fresno Unified School District (FUSD) is the third largest urban K-12 local educational agency in California serving more than 67,819 students that reflects the region's diverse enrollment: 69.6% are Hispanic or Latino; 10.6% are Asian; 7.5% are Black or African American; 7.7% are White; and 3.2% are two or more races. Additionally, 85.8% of FUSD students qualify for the Federal Free and Reduced-Price Meals program based on poverty, 18.8% of students are English Learners, and 86.9% of FUSD students are classified as socio-economically disadvantaged by the California Department of Education (2024-2025 CDE/EdSource).

### **Project: Sunnyside High School - Agriscience & Technology Training Buildings**

Location: Sunnyside High School 718, 748, 810, & 1010 S. Minnewawa Ave. Fresno CA 93727

Sunnyside High School has expanded Career Technical Education as a regional training hub for careers in Climate Smart Agriculture, Environmental Systems, and Ag-technology. City of Fresno identifies agriculture, clean energy, and advanced manufacturing as pillars of Fresno's long-term economic growth in California.

**The Agriscience & Technology Training Buildings** construction is essential to creating a comprehensive 38,995-sf facility that prepares students for both immediate employment and long-term career advancement in precision farming, systems technology, and sustainable production. The objective is to construct purpose-built, industry-aligned facilities that will expand instructional capacity, hands-on training, and provide dedicated zones for sustainable production, innovation, and enterprise management, ensuring students gain the full spectrum of technical, scientific, and business competencies required for success in California's evolving Agriculture Sector. Including Ag Mechanics and Construction, 960 students will be trained annually.

**The construction of the new Agriscience & Technology Training Buildings** will provide industry-aligned environments that mirror professional agricultural settings, ranging from hydroponic research and soil analysis to precision agriculture applying robotics, drone mapping, GPS, and enterprise management connecting climate smart agricultural and industrial best practices directly to community farmers markets and local food systems within Fresno County, ranking as the #1 agricultural producing county in the nation.

**The Labor Market Demand** in the agriculture and logistics sectors face mounting workforce challenges as automation and artificial intelligence rapidly reshape the industry. Despite ongoing efforts to raise wages, employers report persistent labor shortages in high-skill, technical roles such as precision agriculture technicians, irrigation technologists, crop data analysts, and logistics coordinators. At the same time, regional employers are accelerating adoption of automation and AI-driven systems to manage productivity and resources. These shifts reinforce a growing demand for employees who possess both technical agriscience foundations and digital competencies to operate, interpret, and maintain emerging technologies in the field. Agricultural Technicians in the Fresno-Madera area have projected growth rates exceeding 10%.

The proposed new construction for the Agriscience & Technology Training facilities on 17.75 acres east of Sunnyside High School will train the next generation of skilled professionals prepared to lead the state and nation to an environmentally sustainable, technology-driven, and globally competitive agricultural future.

### **Total Project Cost: \$27,000,000**

Secured Local Bond Funds: \$9 million

Pending Grant Applications: \$9 million

### **Funding Request: \$9,000,000**

## Letter to CDFA regarding inclusion of biochar in HEALTHY SOILS PROGRAM 2026 PRACTICE GUIDELINES

Josiah Hunt

2.10.26

Thank you CDFA for including applications of pyrogenic organic matter, biochar, as a practice to be covered by the Healthy Soils Program. While the word biochar is relatively new, and its definition is still evolving, the role of pyrogenic organic matter in topsoil development and function is as old as fire. The general direction of CDFA's move here will undoubtedly result in benefits to the State. Below I provide some considerations for improving outcomes in the rollout of the program.

### **Eligibility section:**

*"Cropland; Orchard and Vineyard"*

The use of the semicolon and the absence of an Oxford comma create ambiguity. This phrasing could be interpreted to mean that only orchards and vineyards are eligible for biochar application, excluding other croplands. Alternatively, it might be read to include croplands such as annual vegetable crops, in addition to orchards and vineyards. Based on the use of "croplands" in other practices and the specific mention of "annual croplands," it seems CDFA's intention may be to restrict eligibility to orchards and vineyards. If so this would be unfairly restrictive to farmers whose soil type might benefit greatly from biochar applications, but whom are not currently cropping orchards or vineyards.

### **Payment scenarios section:**

*"1-6 tons per acre"*

Part 1: It's assumed that the tons mentioned here refer to dry ton equivalent. It would be very helpful to clarify this.

Part 2: If it is not referring to dry ton equivalent, the application rates suggested are prohibitively low and would not be consistent with current scientific and professional consensus for effective biochar application rates.

For context, it's not uncommon for biochar materials to have capacity to hold 6x their weight in water, resulting in the potential for 6 tons "as received" to contain less than 1 ton in dry weight equivalent. Since bone dry biochar can be hazardously dusty, it is important for the sake of producers, handlers, and users of the material that biochar is kept moist. Given the water holding capacity of biochar, the need to moisten it, and the various means of doing so, delivered moisture content for biochar can widely range. It is common for commercial products to be delivered between 50% and 75% MC, with the former representing 1 ton water per 1 ton biochar and the latter representing 3 tons water per 1 ton biochar.

### **Guidelines section:**

*"...good/excellent response to biochar..."*

The guidelines require that plans be prepared by Technical Assistance Providers (TAPs) and that eligible soils are only those *"that show good/excellent response to biochar"*, as determined by the Web Soil Survey Dynamic Soil Properties Response to Biochar (DSPRB) tool. If plans must be prepared by TAPs, then the requirement for soils to have a good/excellent rating in the DSPRB tool should be dropped, since it is redundant, potentially conflicting, and less reliable than TAP approval.

The DSPRB, in its current state of development, is an interesting tool, but it's not ready for this level of application yet – that is, it can be useful as a guide for professionals such as TAP's but should not be taken as a sole determiner. For instance, the tool seems to give quite a lot of weight to pH impacts, whereas in this region, Available Water Capacity (AWC) responses should be of greater weight, being that liming agents are cheap and readily available whereas water resources are precious and limited. Also, integrating the tool with farm plan maps and accounting for discrepancies between actual field conditions and NRCS datasets presents additional challenges.

### **Verification Requirements section:**

*"...records from the compost spreading contractor..."*

There is a documentation requirement that *"records from the compost spreading contractor showing location and tonnage implemented will be required"*. It should be clarified if farmers will be allowed to spread the biochar themselves or if all biochar applications will require the hiring of a contracted third-party spreading service in order to qualify.



February 18, 2026

Office of Agricultural Resilience and Sustainability (OARS)  
California Department of Food and Agriculture  
Sacramento, CA 95814

**Re: Comments on Funding for California's Healthy Soils and Water  
Efficiency and Enhancement Programs**

Dear OARS:

The Bioenergy Association of California (BAC) submits these comments on the draft funding guidelines for the Healthy Soils Program (HSP) and State Water Efficiency and Enhancement Program (SWEET). BAC strongly supports these programs to reduce emissions, enhance soil health, improve water efficiency and enhance agricultural sustainability and productivity. BAC makes several suggestions, below, to maximize the impact of these important programs. In particular, BAC urges OARS to:

- Prioritize the use of biochar (including biochar produced from sewage sludge or biosolids) for increased water efficiency and carbon sequestration in Natural and Working Lands;
- Prioritize funding for renewable energy generated from agricultural residues and livestock waste to build a circular bioeconomy;
- Include R&D funding for dairy digestate to fertilizer; and
- Include funding for compost and renewable ammonia-based fertilizers to restore nutrients, enhance water retention and improve soil health.

BAC represents about 85 members that are converting organic waste to energy to meet the state's clean energy, climate change, wildfire reduction, landfill reduction, and circular economy goals. BAC's public sector members include cities and counties, Tribes, air quality and environmental agencies, waste and wastewater agencies, public research institutions, environmental and community groups, and a publicly owned utility. BAC's private sector members include energy and technology companies, waste haulers, agriculture and food processing companies, investors and consulting firms, and an investor-owned utility.

BAC's recommendations for the draft HSP and SWEET guidelines are below.

## 1. Both HSP and SWEEP Should Prioritize Use of Biochar.

Biochar generated from organic waste is an essential tool to reduce emissions and sequester carbon in Natural and Working Lands. Unlike most other soil amendments, biochar provides permanent carbon sequestration, well over 100 years and more likely hundreds to thousands of years.<sup>1</sup> Research has shown that biochar provides many benefits for Natural and Working Lands, as a recent report summarizes:

“An emerging soil preservation practice that carries multiple direct and ancillary benefits is amending soil with biochar, charcoal that has been intentionally produced for environmental uses. When made from a plant biomass source, biochar is highly porous and absorbent. Adding biochar to soil can enhance agricultural soil performance by improving soil hydrological properties and soil nutrients thereby increasing crop yield. Although biochar's performance varies by biochar properties and application condition, meta-data analyses have shown that using biochar can, on average, improve crop performance and enhance ecosystem services through long-term increases in soil carbon inventory and soil aggregate stability. These benefits, in turn, lead to increased plant-available water, a reduction in nutrient leaching to soil and water and increased plant-available nitrogen, which each acts to drive crop improvement by an average of ~15%. Biochar amendment can also lead to reduced fertilizer-related releases of nitrogenous gases including N<sub>2</sub>O, and ammonia, potentially leading to improved regional air quality.”<sup>2</sup> [citations omitted]

Both HSP and SWEEP should prioritize the use of biochar, which provides numerous benefits for agriculture but its production and use have been slow. As researchers have noted, “Despite biochar's demonstrated environmental and agronomic benefits and its potential to increase farm incomes, biochar soil application has not been widely adopted by farmers as a soil preservation or carbon sequestration practice.”<sup>3</sup>

Financial incentives from HSP and SWEEP would help to accelerate the production and use of biochar to sequester carbon, increase water retention, reduce air pollution, and improve agricultural productivity. SWEEP funding should also prioritize R&D related to biochar to better quantify its benefits so that they can be monetized in carbon and other markets.

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<sup>1</sup> Lawrence Livermore National Lab, *Getting to Neutral – Options for Negative Carbon Emissions in California*, January 2020. LLNL-PRES-795982.

<sup>2</sup> Pourhashem G, Hung SY, Medlock KB, Masiello CA. Policy support for biochar: Review and recommendations. *GCB Bioenergy*. 2019;11:364–380. <https://doi.org/10.1111/gcbb.12582>

<sup>3</sup> Id.

## **2. SWEEP Should Prioritize Renewable Energy Funding for Energy Produced from Agricultural and Livestock Waste.**

BAC strongly supports the inclusion of fuel efficiency and renewable energy installation in the SWEEP funding guidelines. To maximize the benefits for the agriculture sector, however, this funding tranche should prioritize fuels and power that are produced from agricultural residues and livestock waste. Doing so, will maximize the climate and air quality benefits of renewable energy and fuel efficiency funding. In particular:

- Fuels and energy produced from organic waste – such as agricultural residues and livestock waste – are the only forms of energy that can provide carbon negative emissions that are essential to reach carbon neutrality by mid-century.<sup>4</sup>
- Renewable energy and fuels generated from organic waste provide more jobs and economic development, including a higher portion of permanent and high skill / high paying jobs, than other forms of renewable energy.<sup>5</sup> Prioritizing funding for renewable energy generated from agricultural and livestock waste will accelerate development of the circular bioeconomy in agricultural regions of the state.
- Prioritizing fuels and power from agricultural/livestock waste reduces emissions from pile and decay, open manure lagoons, or pile burning, in addition to displacing fossil fuel use.<sup>6</sup> Other renewables only displace fossil fuels, but don't reduce the upstream emissions.

## **3. OARS Should Include Funding for Real Time Distribution of Dairy Digestate for Fertilizer Use.**

HSP and SWEEP should also allocate funding for the engineering and deployment of dairy digestate on a continuous real time basis blended with irrigation water as an immediately available renewable fertilizer. Dairy digestate is a high quality, liquid fertilizer.<sup>7</sup> Unlike raw manure, which lacks the immediate nutrient availability required for high-yield crops, digestate undergoes biological "pre-digestion." This process converts complex organic nitrogen into a plant-ready form, which if applied on a real time basis can dramatically reduce or even eliminate, the need for supplementary commercial ammonium nitrate. As the U.S. Department of Agriculture has found:

“Animal waste, otherwise known as manure, is a valuable source of crop nutrients that can improve physical and biological properties of soil. Manure

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<sup>4</sup> Lawrence Livermore National Lab, footnote 1 above.

<sup>5</sup> Clean Air Task Force: *An Exploration of Options and Opportunities for the San Joaquin Valley Clean Energy Future*, issued in November 2024; Kalra, et al, *Informing Clean Energy Planning in California's San Joaquin Valley*, November 2024.

<sup>6</sup> California Air Resources Board, *Staff Recommendations on San Joaquin Valley Agricultural Burning Assessment*, adopted February 25, 2021, at pages 4, 9-10.

<sup>7</sup> <https://www.ers.usda.gov/amber-waves/2023/april/despite-challenges-research-shows-opportunity-to-increase-use-of-manure-as-fertilizer>.

contains primary macronutrients—namely nitrogen, phosphorus, and potassium—meaning it can substitute for or complement commercial fertilizers. Manure also supplies secondary macronutrients such as calcium, magnesium, and sulfur, as well as micronutrients. In addition, manure provides organic matter and carbon, which makes it useful for improving soil health.”<sup>8</sup>

The anaerobic digestion process acts as a biological refinery. Manure nitrogen is mostly "locked up" in complex organic compounds that break down too slowly for crops to use effectively, forcing farmers to over apply and buy synthetic boosters. Inside the digester, microbes break down organic matter, converting a high percentage of nitrogen into ammonium. This is the same form of nitrogen found in commercial fertilizers, but it is delivered in a biologically active liquid medium. Dairy farmers need funding to engineer, build and implement the best demonstrated systems and procedures including precision dosing, real time dispensing and blending of digestate with irrigation water in order to maximize its benefits and minimize or eliminate commercial fertilizer application.

Systems for the real time and precise dosing of digestate blended with irrigation water, rather than its normal storage and batch delivery, has been shown to substantially reduce a dairy's reliance on fossil-fuel-derived synthetic ammonium nitrate. Real-time precision distribution and the blending of dairy digestate with irrigation water fertilizes crops as and when needed reducing commercial ammonium nitrate supplementation. These digestate distribution systems are complex and need proper implementation but can then help build California's circular economy, reducing fossil derived nitrogen supplementation and expanding the useful products and benefits of dairy digesters.

This is a significant opportunity to further improve the economic and environmental benefits of dairy digesters by the precise dispensing of its renewable and high quality digestate fertilizer that has been demonstrated to reduce fossil fuel-based fertilizer.

#### **4. HSP and SWEEP Should Include Funding for Renewable Ammonia.**

The agriculture sector is the biggest user of ammonia in California, mostly as a component of fertilizer. Globally, ammonia production is a significant source of greenhouse gas emissions, but those emissions can be eliminated if the ammonia is produced using renewable energy and a renewable source of hydrogen. As the University of California Agriculture and Natural Resources (UC ANR) division found, "Hydrogen plays a crucial role in the production of ammonia, a key ingredient in fertilizers. Traditional ammonia production relies on natural gas but using hydrogen from renewable sources can significantly reduce the carbon footprint of fertilizers."<sup>9</sup> As UC ANR notes, California generates an enormous amount of agricultural residues and uses

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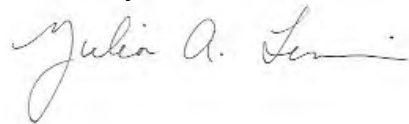
<sup>9</sup> Gilani, et al, *Policy Brief on California's Biomass Potential for Hydrogen Production*, University of California Agriculture and Natural Resources, August 2024.

an enormous amount of ammonia.<sup>10</sup> Putting these two together – converting agricultural residues to green hydrogen and then creating green or renewable ammonia – would provide numerous benefits to California agriculture, from reducing waste biomass to providing green fertilizer, jobs and economic development, and more.

UC ANR also notes that California currently has no green ammonia production facilities, but Texas is starting to develop several. California's HSP and SWEEP should prioritize investments in green ammonia that is generated using process energy and hydrogen produced from agricultural and livestock waste. Doing so will help to commercialize green ammonia, reduce pollution from agricultural and livestock waste, and boost carbon, water and nutrient retention in working lands.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Julia A. Levin".

Julia A. Levin  
Executive Director

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<sup>10</sup> Id.

## Practice Guidelines:

### 1. p.4, Biochar:

Guidelines: 'Biochar will only be supported where BGRs engage in direct invoice payment or bulk purchases.'; Not all soils and biochar types will be supported'.

- First, I don't know if it is financially feasible for BGRs to engage in direct invoice payment or bulk purchases. Some current BGRs do not have those kinds of funds available, so does that mean that those grantees would automatically be exempt from this practice in the next iteration of the HSP grant, for example?

- Second, it is very common for properties to have multiple soil types, so saying that only soils that show good/excellent responses to biochar seems a bit discriminatory to those with multiple soil types. Soil types high in organic matter may not benefit from the biochar like soils with low organic matter...so maybe there should be a numerical threshold of what is or is not acceptable soil types?

- Third, what's the justification for leaving out rangelands from the practice?

### 2. p.5, Compost:

#### Payment Scenarios:

'Scenario 1b Payment Rate \$0-80'

- Why isn't this payment rate also \$64.32? The Beneficiary will have to get transport and possibly spreading from Scenario 1a, so why isn't that Payment Scenario \$80 instead? Payment rates should be equal.

#### Guidelines:

'Scenario 1. Compost must be purchased from a certified facility by the Beneficiary OR by a Block Grant Recipient Organization'

- I am noticing a theme, and that theme is that CDFA does not want vendors like Westside Spreading or Evans Ag to be part of the equation. But the reality is that farmers and BGRs do not have the relationships with the compost facilities like Westside and Evans do. Additionally, they buy compost in bulk and can afford to pay for it up front, and that is not necessarily the same reality for farmers or BGRs. This is not the appropriate way to regulate these vendors and I think it will only make it more difficult and/or costly for farmers to implement this practice.

#### Verification:

'All Scenarios: (1) Geotagged photos from different locations of the field to demonstrate that the practice is fully implemented...'

- So could the Beneficiary show multiple photos of just the spreading and satisfy this requirement? What if the photos are just of compost on the ground? CDFA is trying to exercise leniency but it's not clear enough for the CDFA HSP team and since it is that team that has different interpretations depending on who you speak with. Consistency is necessary.

### 3. p.6, Conservation Cover:

Verification:

'(3) Good plant growth'

- This is way too vague. Again, I understand CDFA is trying to create "easier" guidelines, but unfortunately this is subjective and what the farmer feels is 'good plant growth' could be very different from CDFA's interpretation of 'good plant growth'. Maybe a specific minimum height requirement? Or maybe this is removed and we stick to the 60% ground cover?

### 4. p.7, Conservation Cover in Orchard/Vineyard / Perennial Cover Crop:

Verification:

'(3) Method of alley plants maintenance'

- Again, this just feels vague and I could see it getting messy. Clearer guidance on what CDFA actually means by this would be helpful.

'(4) Good plant growth'

- Same as above

Misc:

- Why doesn't this practice offer the same implementation/payment rates as conservation cover for cropland? Appendix A offered more options and they removed them, so I'd like to know why.

### 5. p.10, Cover Crop:

Guidelines:

'Cover crop is allowed to grow to produce as much biomass as possible'

- Again, I think a minimum height might be best because farmers may need to terminate early based on their farming operation, and so the cover crop may not produce much biomass. A minimum, reasonable height, might be a better option and easier to quantify.

6. p.11, Field Border:

Payment Scenario:

'Scenario 2. Native Species - \$282.78/acre'

- Is this reasonable for the cost of native species? It seems like it might be low?

Misc:

- CDFA doesn't state what types of plants are required for this practice, i.e. trees, flowers, shrubs, etc. We need clarity so that CDFA doesn't return half way through the grant and state they have to be 51% woody plantings, or something like that.

7. p.16, Mulching:

Payment Scenario:

'Purchased through BGR'

- Again, I don't understand why they are restricting vendors, but also, why can't farmers purchase Natural Materials directly from the source – why do they have to purchase through BGR?

Guidelines:

'Scenario 1: ...and cover at least 70% of the implementation acreage'

- For consistency with the rest of the document, it should be  $\geq$  60% implementation acreage

'Scenarios 2/3: ...and hardy enough to last for several years'

- This should be removed as it's subjective and not quantifiable as stated. If CDFA has an expectation of what 'hardy to last several years' looks like, then they should provide physical parameters.

'Scenarios 2/3:...It is not required to have 70% implementation acreage covered by wood chips, but the surface has to be covered and should be calculated carefully'

- What does this even mean? This will be so difficult to enforce and honestly, confusing for CDFA, farmers, and TAPs to actually agree on since it is subjective.

8. p.17, Multistory Cropping/Forest Farming:

Payment Scenario:

Why is the payment rate higher for non-native plants?? Don't native species typically cost more than non-native species? Isn't the goal to encourage planting native species with these practices?

9. p.19, Prescribed Grazing:

- I know this applies to rangeland, but I wonder if they might consider incorporating integrated grazing in orchards/vineyards? A conversation to have since integrated grazing is becoming popular.

10.p.20, Range Planting:

Guidelines:

'Scenario 2a. Seedbed Preparation'

- Why is seedbed preparation only required for the non-native broadcast? Shouldn't it also be included for Scenario 1a and 3? Also, clarity on what seedbed preparation actually looks (mowing, discing, etc) so farmers, especially small farmers understand the expectations of the seedbed prep.

11. p.21, Blank:

- What happened to this page?

12. p.22, Re-Saturating Delta Peat Soils Through Rice Cultivation

- No comments, just very fascinated by this practice that seems to be paying farmers to become rice farmers...are we experiencing a rice shortage in the state?

13. p. 23, No-Till

Verification Requirements:

'(1)...field operations (including equipment used)'

- WHAT DOES THIS MEAN?? This was way too vague and farmers found it very confusing as to what exactly CDFA meant by this...CDFA also seemed unsure of what this meant during this current iteration of the HSP grant.

14. p.24, Reduce Till

- Exact same as above with No-Till. We need clarity!!

15. p.25, Riparian Forest Buffer

Eligibility:

- Why aren't orchards/vineyards included in this practice? We have a creek next to our orchard that could be a great candidate for this practice, so why are they excluding that agricultural system?

16. p.31, Whole Orchard Recycling

Verification Requirements:

'(2) A farm log'

- I asked CDFA for a farm log in Year 1, and they didn't have one and then had a difficult time explaining what information should be included on said farm log. If they want a farm log then they should provide a template so there is a standardized document.



February 18th, 2026

California Department of Food and Agriculture  
Office of Agricultural Resilience and Sustainability (OARS)  
1220 N Street  
Sacramento, California 95814

*Submitted electronically*

**RE: Comments on HSP & SWEEP Program Guidelines and Grant Award Procedures Manual for the Office of Agricultural Resilience and Sustainability**

To the Office of Agricultural Resilience and Sustainability,

Community Alliance with Family Farmers (CAFF) appreciates the opportunity to provide comments on the Office of Agricultural Resilience and Sustainability (OARS) Program Guidelines for both the Healthy Soils Program (HSP), Sustainable Water Efficiency & Enhancement Program (SWEEP) and Grant Award Procedures (GAP) Manual. Representing more than 8,000 small and mid-size farmers in California, CAFF has spent over 47 years advancing family-scale agriculture and building resilient, equitable food systems across the state. We commend CDFA's leadership in supporting growers and organizations to build water and soil health throughout the state while working toward state climate goals.

We are submitting these recommendations to support the continued improvement of HSP and SWEEP programs now administered through the block grant funding structure, with particular focus on improving equity and accessibility. In our work supporting farmers for nearly fifty years and providing technical assistance (TA) for HSP incentives grants since 2017, we understand how these issues show up for California's small growers and the impacts on our farming community. As the following comments address equity and accessibility within the block grant structure, we hope our recommendations to the agency will assist in the success of these important programs for small and mid-size farmers.

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- II. Equity and Accessibility Improvements
- III. Clarifying Equitable Scoring and Project Selection
- IV. Tribal and Community-Led Engagement
- V. Conclusion

### **Part 2: Recommendations on Healthy Soils Program (HSP) and State Water Efficiency & Enhancement Program (SWEEP) Block Grant Programs Draft Grant Award Procedures (GAP) Manual**

- I. Equity, Language Access, and Outreach
- II. Equity Accountability and Transparency
- III. Conclusion

# **Part 1: Recommendations on OARS Healthy Soils Program (HSP) & State Water Efficiency and Enhancement Program (SWEEP) Block Grant Program Draft Application Guidelines**

## **I. Block Grant Structure Concerns**

### **A. Increasing Accessibility for Block Grant Candidates Serving Smaller-Scale Growers**

#### **Rationale:**

Smaller community-based organizations and nonprofits often lack the administrative capacity to successfully pass through significant funding through Block Grant structure without facing challenges with cash-flow, administrative burden and capacity for technical assistance. Furthermore, BGRs serving small-scale farmers are supporting a larger number of smaller projects (e.g. farmer incentives grants). Managing a higher volume of projects increases the amount of administrative and technical assistance needed to successfully support beneficiaries. It is essential that these challenges are taken into account to ensure that Block Grant programs such as HSP and SWEEP are accessible to organizations who serve small-scale producers and Socially Disadvantaged Farmers and Ranchers (SDFRs). Without safeguards, this structure may limit participation to larger entities and reduce the diversity and competitiveness of block grant applicants.

#### **Recommendation:**

- Create a “micro” Block Grant category for organizations serving small-scale and SDFR/BIPOC farmers with a lower minimum award, capped individual project awards/sizes, and higher allowable percentage for TA/admin costs to reduce up-front cash-flow burdens and promote equitable participation in HSP and SWEEP. For example, one possibility could be to reduce the minimum BG award to \$1 Million, cap individual incentives grants at \$50,000, and increase the amount allowable admin and TA to 30%.
- Adjust the administrative cost cap by amending the 30% cap on subaward and contract costs within the Project Administrative budget to exclude subawardees, and remove any limits on the number of subawards allowed.

## **II. Equity and Accessibility Improvements**

### **A. Multi-Language Accessible Materials and Multi-Lingual Community Outreach**

#### **Rationale:**

Many small-scale growers, and socially disadvantaged farmers and ranchers (SDFRs) speak languages other than English, with [80% or more](#) of California’s agricultural workers primarily comfortable speaking Spanish. Without clear requirements and dedicated funding for multi-language outreach and support, these communities face significant barriers to accessing HSP and SWEEP funds and risk being excluded from program benefits or being unsuccessful in grant implementation.

**Recommendation:**

For Block Grant (BG) applicants planning to serve non-English speaking farmer or rancher communities, the BG application should require applicants to:

- Demonstrate their expertise/plans to provide outreach materials, application instructions, and technical assistance (TA) resources in the language(s) of the farming communities they are aiming to serve (e.g. Spanish, Punjabi, [Hmong](#), and Indigenous languages such as Mixteco, etc.)

Additionally, the Guidelines should ensure that adequate funding is explicitly allocated for translation and interpretation services so that Technical Assistance Providers (TAPs) can meaningfully support non-English-speaking producers throughout application, implementation, and reporting processes and better deliver hands-on, on-farm support tailored to producers with limited grant experience. Having a higher admin and TA % of the total budget for BGRs serving non-english speaking SDFRs would be one way to resource this challenge.

**B. Strengthening Technical Assistance and Capacity Building****Rationale:**

Targeted, culturally competent TA is essential to ensure equitable access to climate-smart agriculture programs, particularly for producers who have historically been underserved by state agencies.

**Recommendation:**

While the Guidelines reference outreach and TA through Community Education Specialists (CES) via the CDFA–UC ANR partnership, they do not sufficiently specify resources for producer capacity building. We recommend the following additions:

- Support the CDFA/UC ANR Joint Climate-Smart Agriculture Program, in partnership with CES, to offer capacity-building workshops, peer-to-peer learning networks, and targeted sessions for tribal producers, limited-resource farmers, and beginning farmers.
- Establish guidelines to ensure Block Grant Recipients (BGRs) recruit and support TA providers who reflect the demographics, languages, and cultural contexts of the communities they serve.
- Provide detailed procedures for **how technical assistance must be delivered, monitored, and evaluated** beyond compliance and deliverables tracking. Defining expectations here helps ensure TA is effective and equitable.

**C. Accountability for Serving Small and Socially Disadvantaged Farmers & Ranchers (SDFR)****Rationale:**

Without defined evaluation standards and scoring incentives, equity goals remain broad and difficult to enforce, increasing the risk that small and historically underserved producers will be left behind.

**Recommendation:**

The Guidelines reference equity targets, including directing 40 percent of funds to disadvantaged communities and allocating 25 percent of technical assistance to SDFRs. To strengthen accountability, we recommend:

- Clarifying how TAPs and BGRs will be evaluated on their success in reaching small-scale and socially disadvantaged producers, rather than primarily larger or well-resourced operations.
- Strengthening scoring criteria and outreach requirements to ensure proposals demonstrate clear, measurable strategies for recruiting and serving SDFRs.
- To track equity outcomes, CDFA can disaggregate project completion rates by producer characteristics (e.g., SDFRs, non-English-speaking farmers, and non-SDFRs) as a program-level tracking metric to identify barriers and service gaps, without using this data as a performance measure for individual Block Grant Recipients.

**D. Reducing Delays to Project Verification and Producer Reimbursement****Rationale:**

While the streamlined HSP Practice Guidelines and phased-in independent verification reduce administrative burden, limited clarity in verification requirements can create uncertainty for smaller Block Grant Recipients, delay reimbursements, and disproportionately impact small-scale farmers. Furthermore, small-scale and SDFR producers often face barriers to more costly one year practices, such as hedgerows, due to high upfront material and labor costs to complete practice and causing delays before receiving reimbursement.

**Recommendation**

- Maintain the streamlined HSP structure while clarifying verification requirements by providing greater specificity—while preserving flexibility—on acceptable verification materials and procedures to support consistent implementation and timely reimbursement (e.g. number of geo-tagged photos required by CDFA).
- Allow flexible verification for TAPs to verify practices using either geotagged photos or non-geotagged photos combined with in-person, on-farm verification and attestation, ensuring both flexibility and program integrity and addressing geo-location accuracy challenges in rural areas).
- Allow BGRs to do partial practice verification and producer reimbursement for expensive one-year HSP practices such as hedgerows or windbreaks. For example, allow a producer to implement one half the planned hedgerow in year 1, complete verification, receive partial reimbursement for amount completed, and in year 2, allow producer to implement remainder of practice, complete verification and receive remaining payment. This would allow for small scale producers and SDFRs who have limited cash flow to more effectively complete expensive one-time practices.

### **III. Clarifying Equitable Scoring and Project Selection**

**Rationale:**

Clear, transparent equity-focused scoring criteria will help ensure that pass-through funding is distributed fairly and aligns with the state's climate and equity objectives.

**Recommendation:**

The Guidelines should explicitly integrate equity considerations into scoring and project selection criteria. We recommend:

- Adding equity-focused dimensions to scoring rubrics, including points for demonstrated success serving SDFRs, underserved communities, and small growers.
- Providing transparent scoring metrics that describe how applicants will incorporate equity goals into outreach, project selection, and implementation.
- Encouraging CDFA to share relevant demographic and geographic data and ensure scoring rewards service to underserved regions.

### **IV. Tribal and Community-Led Engagement**

**Rationale:**

Meaningful consultation and co-design strengthen program effectiveness, improve equity outcomes, and ensure climate investments reflect the priorities and knowledge of tribal and community stakeholders.

**Recommendation:**

We are encouraged by OARS's inclusion of a dedicated tribal carveout through SWEEP of up to \$4 million and the potential HSP set-aside of up to \$4 million, which represents an important equity commitment. To ensure this investment is successful, we encourage OARS to promote meaningful tribal and community-led engagement beyond funding set-asides, including:

- Supporting tribal consultation processes that allow for co-design of program criteria, culturally appropriate outreach strategies, and evaluation frameworks.
- Strengthening guidelines that promote authentic community participation in program design and implementation.

### **Conclusion on Draft Application Guidelines**

We appreciate CDFA's commitment to advancing climate-smart agriculture through HSP and SWEEP and encourage incorporation of the recommendations above to strengthen equity, accessibility, and program effectiveness. As the block grant model expands, it is critical to account for the limited administrative capacity and cash-flow constraints faced by community-based organizations serving small-scale/SDFR producers, who often manage a higher volume of smaller projects requiring increased technical assistance and administrative support.

Without targeted safeguards, the block grant structure risks favoring larger entities and limiting equitable participation. Clear requirements, accountability measures, and flexible funding structures—including options such as micro block grants and adjusted administrative and TA cost caps—will help ensure that small-scale, socially disadvantaged, and historically underserved producers can fully participate in and benefit from these critical programs.

## **Part 2: Recommendations on Healthy Soils Program (HSP) and State Water Efficiency & Enhancement Program (SWEET) Block Grant Programs Draft Grant Award Procedures (GAP) Manual**

### **I. Equity, Language Access, and Outreach**

The draft manual outlines general procedures for grant management; it currently emphasizes administrative responsibilities **without a clear framework or expectations for how equity objectives (including reaching underserved producers) will be operationalized within everyday procedures**. Without these details, equity goals risk remaining aspirational rather than enforceable.

#### **Recommendation:**

The GAP Manual should explicitly establish equity expectations and procedural requirements for Block Grant Recipients (BGRs) to ensure equitable access for small, socially disadvantaged, and linguistically diverse producers. This should include requirements for culturally responsive outreach practices; multi-language communication protocols requiring outreach, application, and project materials in languages relevant to service areas; minimum equity performance metrics tied to engagement with socially disadvantaged farmers and producers with limited English proficiency; and dedicated, allowable budget line items for translation, interpretation, and culturally relevant outreach.

### **II. Equity Accountability and Transparency**

Without accountability mechanisms tied directly to equity outcomes, GAP manual requirements may remain **procedural** by not addressing how grant recipients succeed in reaching underserved producers beyond ticking a compliance box.

#### **Recommendation:**

The GAP Manual should include enforceable accountability mechanisms tied to equity outcomes, not solely procedural compliance. This should require BGRs to report standardized equity metrics, including the number and demographics of producers served, languages supported, and geographic reach; establish corrective action requirements when equity or outreach targets are not met; and require public summary reporting to promote transparency and accountability.

## Conclusion

In addition to comments on the OARS HSP and SWEEP Program Guidelines, we recommend the GAP Manual must clearly operationalize equity through explicit outreach requirements, language access standards, and measurable performance expectations. Embedding enforceable accountability and transparency mechanisms will help ensure Block Grant Recipients are effectively reaching socially disadvantaged and linguistically diverse producers and advancing equitable outcomes across programs.

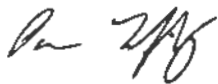
Finally, as CDFA implements significant changes to the HSP and SWEEP block grant structure this year, we encourage the Department to establish a formal, ongoing feedback process that allows Block Grant Recipients to submit input and recommendations on a quarterly basis. Creating a structured feedback loop will recognize that refining systems, procedures, and efficiencies takes time and will enable CDFA to learn directly from on-the-ground implementation experiences. Block Grant Recipients are well positioned and willing to share insights that can strengthen program delivery, improve equity outcomes, and ensure the long-term success of the block grant model.

Thank you for taking the time to read our recommendations, and we look forward to working together with OARS on the future of these programs.

Sincerely,



Keely Cervantes  
Policy & Organizing Manager



Sara Tiffany  
Director of Ecological Farming

**From:** Biochar Coalition <biocharcoalition@gmail.com>  
**Sent on:** Wednesday, February 18, 2026 6:02:42 PM  
**To:** Tera Lewandowski <tera@biochar-us.org>  
**CC:** CDFA Agricultural Resilience & Sustainability  
Office@CDFA <cdfa.oars@cdfa.ca.gov>  
**Subject:** Re: Public Comment - Biochar Coalition - on Draft Healthy Soils Program (HSP)  
2026 Practice Guidelines and Award Procedures

Dear CDFA Office of Agricultural Resilience and Sustainability,

Please find attached **Biochar Coalition's** formal public comment regarding the **Draft Healthy Soils Program (HSP) 2026 Practice Guidelines and Award Procedures** funded under Proposition 4.

Our comment addresses the categorical exclusion of on-site biochar production, its implications for community-based carbon sequestration efforts, and the need for a transparent technical rationale consistent with the Climate Bond's stated objectives.

We respectfully request that this submission be included in the **official public record** for the current comment period. We also welcome any **opportunity for further discussion** or clarification as CDFA evaluates stakeholder input.

Thank you for your consideration, please inform us after you have received our comment.

Respectfully,

Kenneth Scherer  
Executive Director  
716-880-0386



[BiocharCoalition.org](http://BiocharCoalition.org)

[29165 New School Road  
Nevada City CA 95959](http://29165%20New%20School%20Road%20Nevada%20City%20CA%2095959)



February 17, 2026

Biochar Coalition

29165 New School Road

Nevada City CA 95959

530-264-0249

To : California Department of Food and Agriculture : Office of Agricultural Resilience and Sustainability

Re: Public Comment on Draft Healthy Soils Program (HSP) 2026 Practice Guidelines and Award Procedures – Proposition 4 Funding

Whom It May Concern:

Biochar Coalition respectfully submits the following comments regarding **the Draft 2026 Healthy Soils Program Practice Guidelines and Grant Award Procedures**, funded through Proposition 4, the Climate Bond.

The Draft Guidelines define biochar as “**Biochar produced off-site is incorporated into the soil**” and further state that “**Biochar must be produced off-site and incorporated into the soil at a total rate of 1–6 tons/acre**” (California Department of Food and Agriculture 2026, 4). This categorical exclusion of on-site biochar production represents a material policy decision with significant economic, environmental, and community implications. However, the Draft Guidelines provide no technical justification, scientific basis, statutory mandate, or public record of consultation explaining this restriction.

This exclusion is particularly concerning given the express intent of Proposition 4 funding. The Climate Bond allocates funding to “improve soil health or accelerate carbon removal or sequestration” and to advance climate resilience strategies (State of California 2024). On-site biochar production directly addresses these objectives by stabilizing carbon in situ, reducing wildfire fuel loads, minimizing transportation-related emissions, and strengthening localized circular biomass systems. The Draft Guidelines do not explain how excluding on-site production advances Proposition 4’s climate and carbon sequestration goals.

The Guidelines treat compost differently. Under the Compost Application practice, “On-farm Produced compost” is explicitly permitted, provided feedstocks and composting processes are documented (California Department of Food and Agriculture 2026, 5). Compost and biochar are both process-derived organic soil amendments. Both require documentation, quality control, and verification. The allowance of on-farm compost production while categorically prohibiting on-site biochar production demonstrates that process-based verification is administratively feasible. The inconsistency raises legitimate questions regarding equal treatment of functionally analogous practices.

Further, the Draft Biochar practice requires **Technical Assistance Providers** to receive United States Biochar Initiative (USBI) training and ties eligibility to American Society of Agricultural and Biological Engineers standards (California Department of Food and Agriculture 2026, 4). While quality assurance is appropriate, the practical effect of this structure is to centralize participation through a limited set of commercial producers and credentialing pathways. This approach risks narrowing market participation and may inadvertently exclude small-scale producers, tribal land managers, workforce training initiatives, and rural land-based practitioners who produce biochar directly at the site of treatment.

Biochar is not exclusively a centralized industrial product. Across California, numerous practitioners employ flame-cap kilns, i.e ring-of-fire systems, and other low-emission production techniques under controlled conditions with temperature logging, feedstock documentation, and third-party laboratory analysis. These systems are capable of meeting measurable quality standards. The Draft Guidelines do not appear to acknowledge this established body of field-based practice or provide a pathway for verifiable on-site compliance.

The absence of an on-site pathway creates an unnecessary divide within the broader biochar community. Proposition 4 funding is public climate funding intended to support scalable, community-accessible carbon solutions. By structuring eligibility in a manner that favors centralized production models without documented stakeholder consultation, the Draft Guidelines risk undermining community-based carbon sequestration efforts that are fully aligned with the Bond's objectives.

If CDFA's concern relates to quality control, a defined verification framework for on-site production could be developed. Such a framework might include:

- Documented feedstock sources
- Temperature monitoring records
- Batch-level sampling and laboratory analysis
- Site-specific implementation logs
- Third-party verification where appropriate

These mechanisms are comparable to those already required for compost verification. A categorical exclusion is not the only regulatory option available.

Accordingly, Biochar Coalition respectfully requests that CDFA:

1. Provide the technical and policy rationale supporting the exclusion of on-site biochar production.
2. Clarify whether stakeholder consultation included representation from small-scale and land-based biochar practitioners.
3. Evaluate development of a verifiable eligibility pathway for on-site biochar production consistent with Proposition 4's carbon sequestration and climate resilience objectives.

Public climate funding should not unintentionally consolidate participation into a narrow segment of the market without transparent justification. Proposition 4 was advanced as a mechanism to accelerate climate solutions, including community-scale carbon practices. On-site biochar production is one such practice. Its categorical omission warrants reconsideration.

We appreciate the opportunity to submit these comments and look forward to continued engagement.

Respectfully submitted,



Kenneth John Scherer  
Executive Director  
Biochar Coalition

***References:***

1. California Department of Food and Agriculture. 2026. Healthy Soils Program 2026 Practice Guidelines. Sacramento: CDFA Office of Agricultural Resilience and Sustainability.
2. California Department of Food and Agriculture. 2026. Public Comments for HSP and SWEEP Draft Application Guidelines and Award Procedures. Sacramento: CDFA OARS.
3. State of California. 2024. Proposition 4 – Climate Bond Act of 2024. Sacramento: State of California.

## DRAFT PUBLIC COMMENTS

### Healthy Soils Program (HSP) & State Water Efficiency and Enhancement Program (SWEEP)

*Climate Bond Block Grant Draft Application Guidelines & Draft Award Procedures*

*For the Scientific Advisory Panel (SAP) on Resilient and Sustainable Agriculture — February 12, 2026*

Prepared: February 11, 2026 • Written Comment Deadline: February 18, 2026, 11:59 PM

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#### Submitted To:

Office of Agricultural Resilience and Sustainability (OARS), California Department of Food and Agriculture (CDFA)

Via Climate Bond Funding Webpage and [cdfa.oars@cdfa.ca.gov](mailto:cdfa.oars@cdfa.ca.gov)

#### Submitted By:

[Organization Name]

[Contact Name, Title, Email, Phone]

#### Re:

Draft Application Guidelines and Draft Award Procedures for HSP and SWEEP Block Grants (Released January 20, 2026)

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## I. Introduction and General Support

We appreciate the opportunity to provide comments on the Draft Application Guidelines and Draft Award Procedures for the Healthy Soils Program (HSP) and State Water Efficiency and Enhancement Program (SWEEP) Block Grants, funded by Proposition 4, the Climate Bond approved by California voters in November 2024.

We strongly support OARS' continued investment in climate-smart agriculture and commend the design of a block grant structure that leverages trusted regional organizations to deliver funding and technical assistance directly to producers. The block grant model's emphasis on local relationships, equity targets, and flexible service delivery is well-aligned with California's climate resilience and agricultural sustainability goals.

The approximately \$50 million for HSP Block Grants and \$34 million for SWEEP Block Grants represent a significant opportunity to scale adoption of climate-smart practices across the state. We support the two-phase Concept Proposal and Full Proposal application process, which reduces burden on applicants, and the strong focus on serving Socially Disadvantaged Farmers and Ranchers (SDFRs), Disadvantaged Communities (DACs), and Severely Disadvantaged Communities (SDACs) as required by the Climate Bond.

The following comments are intended to strengthen the final guidelines and ensure these programs are as accessible, effective, and equitable as possible for California’s diverse farming and ranching communities.

## II. On-Farm Project Funding Caps

**Issue:** The draft guidelines set per-beneficiary caps at \$150,000 for HSP (with a \$75,000 cap per practice) and \$200,000 for SWEEP. While we understand the goal of maximizing the number of producers served, these caps may be insufficient for certain operations and project types, particularly given rising costs for materials, labor, and irrigation infrastructure since these programs were last calibrated.

**Context:** SWEEP projects often involve significant capital investment in irrigation system upgrades, soil moisture monitoring, and variable frequency drives. Similarly, HSP practices like biochar application—a new eligible practice in this solicitation—have highly variable costs. The \$75,000 per-practice cap for HSP may particularly constrain producers who wish to implement multiple complementary practices on the same operation, which often yields the greatest environmental benefit.

### Recommendations:

- **Conduct a cost analysis** using data from the 2023 block grant pilot to determine whether current caps reflect actual project costs in today’s market. Adjust caps if the data supports it.
- **Allow BGRs flexibility to request cap waivers** for projects that demonstrate exceptional environmental outcomes, particularly in severely disadvantaged communities or for operations implementing multiple complementary practices.
- **Clarify how biochar costs will be handled** given the wide variability in biochar pricing. The guidelines note that no flat rate will be offered and that BGRs will support biochar through direct purchase or invoice—additional guidance on budget expectations for this new practice would help applicants.

## III. Administrative Funding Cap (20%) May Be Insufficient

**Issue:** The guidelines stipulate that up to 20% of each block grant award may fund Project Administration, with at least 80% directed to on-farm practices. While maximizing on-farm investment is the right goal, the 20% cap may be too restrictive for BGRs to deliver the level of outreach, technical assistance, and reporting that the program demands—especially given the Climate Bond’s equity requirements.

**Context:** Meeting the Climate Bond’s targets (40% of funds benefiting DACs/SDACs/vulnerable populations, 10% to SDACs, and 25% of TA funding to SDFRs) requires intensive, culturally responsive outreach, multilingual communication, and sustained relationship-building with historically underserved communities. Additionally, BGRs are required to maintain a public webpage, attend monthly check-in calls with OARS, conduct site visits, host demonstration field

events, develop case studies, and manage complex invoicing and advance payment processes. These are substantial commitments.

### Recommendations:

- **Increase the administrative cap to 25%** for BGRs that demonstrate a commitment to serving SDFRs and DAC/SDAC communities, recognizing that equity-focused outreach is more resource-intensive than general outreach.
- **At minimum, clarify what activities count as “Project Administration”** versus on-farm costs. For example, if a TAP conducts a farm visit to help design an on-farm project, does that cost fall under administration or on-farm practices? Clear categorization will help BGRs plan realistic budgets.
- **Consider a tiered approach** where the admin percentage is proportional to the number of beneficiaries served or the geographic size of the service area.

## IV. Equity Targets and “Direct and Meaningful Benefits”

**Issue:** The Climate Bond requires 40% of funds to provide “direct and meaningful benefits” to DACs and vulnerable populations, with 10% to SDACs. While the guidelines reference Appendix B for definitions, more specificity is needed on how “direct and meaningful benefits” will be defined, measured, and verified across the diverse range of block grant projects.

### Recommendations:

- **Provide concrete examples** of what constitutes a “direct and meaningful benefit” in the context of HSP and SWEEP projects. For instance, is it sufficient for an on-farm project to be located within a DAC census tract, or must the beneficiary themselves qualify as a member of a vulnerable population?
- **Clarify the relationship between the 40% DAC/SDAC target and the 25% SDFR technical assistance target.** Applicants would benefit from guidance on whether these targets can overlap (i.e., an SDFR in a DAC counts toward both) or whether they are measured independently.
- **Publish the verification methodology** that OARS will use to assess whether block grants are meeting Climate Bond equity targets. This transparency will help BGRs design their outreach and selection processes to align with program expectations from the outset.
- **Ensure that self-certification for SDFR status is accepted,** consistent with the Farmer Equity Act, so that documentation requirements do not themselves become a barrier to participation by the communities the Climate Bond intends to serve.

## V. Incomplete Elements and Timelines (TBD Items)

**Issue:** Several critical elements of the application process remain “To Be Determined,” including Q&A session schedules, concept proposal deadlines, templates, and the precise timeline for the

Full Proposal phase. While we understand the guidelines are still in development, these gaps make it difficult for prospective applicants—particularly smaller organizations with limited grant-writing capacity—to plan their applications and allocate staff time.

### Recommendations:

- **Publish a complete timeline with firm dates** as soon as possible, ideally before the close of the public comment period, so that stakeholders can comment on whether the timeframes are realistic.
- **Ensure at least 60 days between the publication of the final guidelines and the Concept Proposal deadline** to give organizations sufficient time to assemble partnerships, assess service area needs, and draft competitive proposals.
- **Release draft templates for the Concept Proposal and Full Proposal** concurrently with the final guidelines. Applicants need to see the actual forms to accurately estimate the level of effort required.
- **Provide advance notice of informational webinar dates** so organizations can schedule key staff to attend.

## VI. Two-Phase Application Process

**Support:** We commend OARS for adopting a two-phase application process. The Concept Proposal stage reduces the upfront investment required from applicants and allows OARS to provide targeted feedback before organizations invest significant effort in a Full Proposal. This is a meaningful improvement over the traditional single-application model.

**Concern:** The guidelines note that OARS “is unable to assist individuals with specific grant application questions during the Concept Proposal process” and will only answer general questions. While we understand this protects competitive integrity, it may disadvantage smaller or less experienced organizations that would benefit most from the block grant model.

### Recommendations:

- **Expand the role of UC ANR Community Education Specialists** during the Concept Proposal phase to provide hands-on assistance to first-time applicants and organizations serving underrepresented communities, particularly Tribal organizations.
- **Consider providing applicants who advance to the Full Proposal stage with written feedback** on their Concept Proposal, not just a pass/fail notification, to strengthen their Full Proposals.
- **Clarify the portfolio balancing criteria.** The guidelines mention that OARS may use portfolio balancing when advancing Concept Proposals. Transparency about how geographic distribution, program type, and other factors will be weighed will help applicants understand their competitive positioning.

## VII. Reporting and Verification Requirements

**Issue:** The Grant Award Procedures outline extensive reporting, invoicing, and verification requirements, including quarterly invoices, monthly check-in calls, annual reports, site visits, geotagged photography, and quantification of climate benefits using established tools. While accountability is essential, the cumulative burden of these requirements may strain the capacity of smaller BGRs.

### Recommendations:

- **Streamline reporting for smaller awards.** Consider a tiered reporting structure where BGRs receiving awards at the lower end of the \$2–\$4M range have proportionally lighter reporting requirements.
- **Invest in user-friendly digital tools** for invoicing, reporting, and verification. If BGRs are expected to manage complex advance payment and reimbursement processes, the reporting platform should be intuitive and accessible.
- **Clarify expectations around the COMET-Planner and other quantification tools.** Specify which tools are required for which practices, and ensure BGRs and TAPs receive adequate training during the onboarding process.
- **Allow reasonable flexibility in site visit scheduling,** particularly for BGRs covering multi-county service areas where travel time is significant.

## VIII. Proposed Ad Hoc Subcommittee on Producer Access to Funding

**Support:** We strongly support Dr. Nina Bingham’s proposal that the EFASAP constitute an Ad Hoc Subcommittee to assess pathways for increasing producer access to funding for climate-smart agriculture. This is a timely and important initiative.

Despite growing demand, many producers—particularly small-scale, socially disadvantaged, and tribal farmers and ranchers—continue to face significant barriers to accessing HSP, SWEEP, and related programs. These barriers include language and technology access, lack of awareness of available programs, complexity of application processes, and insufficient technical assistance capacity in rural and underserved regions.

### Recommendations for the Subcommittee’s Priorities:

- **Assess language access:** Evaluate whether program materials, application platforms, and technical assistance are available in the languages spoken by California’s agricultural workforce, including Spanish, Hmong, Punjabi, and Mixtec.
- **Study the block grant pilot outcomes:** The 2023 HSP and SWEEP block grant pilots generated valuable data. The Subcommittee should analyze whether the pilot model successfully reached new producers who had not previously accessed CDFA programs.
- **Examine stacking and coordination:** Explore how state programs (HSP, SWEEP, AMMP) can be better coordinated with federal programs (USDA EQIP, CSP, Climate Smart Commodities) to maximize total funding available to individual producers without duplication.

- **Solicit direct producer input:** Ensure the Subcommittee includes listening sessions or surveys with farmers and ranchers—particularly those who have attempted but failed to access funding—to understand barriers from the ground level.
- **Evaluate the Tribal set-aside approach:** The draft guidelines reference a SWEEP Tribal set-aside of up to \$4M and a planned separate HSP Tribal solicitation. The Subcommittee should assess whether these set-asides are sufficient and whether the tribal engagement process is adequately resourced.

## IX. Additional Technical Comments

### A. BGR Eligibility and Partnerships

We support the broad eligibility for BGRs (public agencies, nonprofits, special districts, tribes, etc.) and the strong encouragement of multi-organization partnerships. We recommend that OARS provide model partnership agreement templates to help organizations formalize subrecipient relationships efficiently, particularly for organizations that are new to state block grant administration.

### B. Technical Assistance Provider (TAP) Capacity

The Canella Act defines eligible TAP organizations and requires prioritization of SDFRs. We urge OARS to monitor TAP capacity statewide and identify regions where TAP availability is insufficient to meet producer demand. In areas with TAP gaps, OARS should actively facilitate connections between BGRs and UC ANR Community Education Specialists or other qualified providers.

### C. Grant Beneficiary Eligibility

We request clarification on eligibility for producers operating on leased land with short-term lease agreements. Many beginning and socially disadvantaged farmers operate under annual or short-term leases, which may create uncertainty about their ability to commit to multi-year practice maintenance requirements. The guidelines should address how lease length interacts with beneficiary eligibility and practice maintenance obligations.

### D. Biochar as a New HSP Practice

We welcome the addition of biochar application as an eligible HSP practice. Given that biochar is new to the program and that CDFA and the U.S. Biochar Initiative are still cooperating on TAP certification training, we recommend that OARS provide a clear timeline for when biochar-certified TAPs will be available and how BGRs should budget for biochar projects in the interim.

### E. Climate Benefit Quantification

The requirement that all Grant Beneficiaries quantify climate benefits using established program tools is important for program accountability. However, we note that quantification tools may not yet fully account for the benefits of all eligible practices, particularly newer ones like biochar. We

recommend that OARS clearly identify which quantification tools apply to which practices and commit to updating tools as the science evolves.

## **X. Conclusion**

We are grateful for OARS' commitment to public engagement and the opportunity to participate in shaping these important programs. The HSP and SWEEP Block Grants represent a powerful vehicle for advancing climate-smart agriculture in California, and the Proposition 4 Climate Bond funding ensures this work can continue at meaningful scale.

We urge OARS to carefully consider the comments above, particularly regarding funding cap adequacy, administrative capacity for equity-focused outreach, clarity on “direct and meaningful benefits” definitions, and timely publication of complete application materials and timelines.

We look forward to the SAP meeting on February 12, 2026, and to submitting these written comments before the February 18 deadline. We welcome the opportunity for continued dialogue as these programs move toward final guidelines and solicitation.

**Thank you for your consideration.**

*Respectfully submitted,*

[Signature]

[Name, Title, Organization]

[Date]



February 18, 2026

The Honorable Karen Ross  
Secretary  
California Department of Food and Agriculture  
1220 N Street  
Sacramento, CA 95814

Attention: **Office of Agricultural Resilience and Sustainability (OARS)**

Re: **Comments on 2026 Healthy Soils Program Practice Guidelines – Biochar Provisions**

Dear Secretary Ross,

Thank you for the opportunity to provide comments on the 2026 Healthy Soils Program (HSP) Practice Guidelines. We appreciate CDFA's continued leadership in advancing soil health, climate resilience, and on-farm innovation across California agriculture.

***About USBC***

The U.S. Biochar Coalition is a trade association unifying the voice of the biochar industry to catalyze development of the market, policy, and economic conditions necessary to expedite industry growth in the United States. Our mission is to:

- Advocate for legislative, policy, & regulatory action to build and open markets for the production and use of biochar in the U.S.;
- Raise federal policy, legislative & regulatory awareness of the benefits of biochar systems and products to break down barriers to growth;
- Deconstruct silos between the biochar business community & end use market sectors to cross pollinate opportunities for growth;
- Unite biochar industry leaders, create opportunities for collaboration, build a platform for action.

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### ***Our Members***

USBC members utilize pyrolysis and gasification non-combustion thermal conversion technologies to process biogenic feedstocks and produce non-fossil energy, biochar, and permanent carbon removals. Our membership spans the full biochar industry ecosystem: producers, technology providers, developers, R&D, finance, carbon markets, climate tech, carbon removal, and diverse end markets.

### ***About Biochar***

Biochar is “the solid material obtained from the thermochemical conversion of biogenic waste in an oxygen-limited environment.”<sup>1</sup> It is “one of only a few permanent carbon removal technologies, and the one at highest technology readiness level” to meet the “massive incoming demand for carbon removal.”<sup>2</sup> One ton of high temperature<sup>3</sup> biochar placed into a durable sequestration permanently removes up to three tons of CO<sub>2</sub> from the atmosphere.

Today, eighty (80) percent of biochar is durably sequestered in soils to improve agricultural and horticultural yields; displace fossil fuel-based fertilizers; increase soil health, carbon content, and water retention; remediate contamination; boost farm income; control operational costs; and activate additional nature-based carbon sequestrations.

Biochar’s potent removal power, cost efficiency, and immediate scalability combined with its unparalleled climate, social, environmental, and financial co-benefits, make biochar the United States’ most valuable carbon removal tool.

**We respectfully submit the following recommendations regarding the biochar provisions in the draft guidelines.**

### **1. Increase or Provide Flexibility Beyond the 6 Tons per Acre Application Cap**

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[info@usbiocharcoalition.org](mailto:info@usbiocharcoalition.org)



The current guideline limits eligible biochar application to 6 tons per acre. While we understand the need for program guardrails and cost containment, field research and producer experience indicate that soil health, carbon sequestration, water holding capacity, and nutrient retention benefits may continue at application rates up to 10 tons per acre, particularly in low organic matter soils.

A fixed cap at 6 tons per acre may unintentionally constrain optimal agronomic outcomes and limit the climate mitigation potential of this practice.

We recommend one of the following approaches:

- Increase the eligible application rate to 10 tons per acre; or
- Allow site-specific applications above 6 tons per acre (up to 10 tons) when supported by soil testing, carbon modeling tools, or a Technical Assistance Provider's agronomic justification.

A science-based flexibility provision would ensure responsible implementation while allowing growers to tailor applications to site conditions and maximize soil carbon benefits.

## **2. Allow Eligibility for Biochar Produced Onsite**

The draft guidelines restrict eligibility to biochar produced offsite. We respectfully request that CDFA reconsider this limitation.

Across California, producers are investing in integrated, on-farm biochar systems that convert agricultural residues into high-quality soil amendments. These systems:

- Reduce transportation-related emissions
- Improve feedstock traceability and quality control
- Support circular farm nutrient systems
- Promote rural economic development and innovation

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Restricting eligibility based solely on production location may unintentionally discourage distributed and climate-efficient systems, while favoring centralized suppliers.

We recommend that eligibility be based on product quality, safety, emissions compliance, and performance standards — not production location. Biochar produced onsite should qualify if it meets all applicable HSP quality and environmental criteria.

Determining eligibility based on verified environmental performance rather than geographic production origin would better align with California's climate and circular bioeconomy goals.

## **Conclusion**

We appreciate CDFA's commitment to strengthening the Healthy Soils Program and expanding access to climate-smart agricultural practices. By increasing flexibility in application rates and allowing onsite biochar production to qualify, CDFA can further support innovation, equity, and measurable climate benefits.

Thank you for your consideration. We welcome continued engagement and would be pleased to provide additional technical input if helpful.

Sincerely,

Maureen Walsh  
Executive Director  
US Biochar Coalition

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February 18, 2026

California Department of Food and Agriculture  
1220 N Street  
Sacramento, California, U.S.A. 95814

**Re: Comments on 2026 Healthy Soils Program Practice Guidelines – Biochar Provisions**

On behalf of Sitos Group, we appreciate the opportunity to provide input on the draft 2026 Healthy Soils Program (HSP) Practice Guidelines. As a company engaged in advancing climate-smart agricultural solutions in California, we value CDFA's efforts to expand adoption of practices that improve soil function and long-term farm resilience.

**About Sitos Group**

Sitos Group is a California-based agricultural climate solutions company and active biochar producer focused on advancing scalable, high-quality soil carbon strategies. The company develops and operates biochar production systems that convert agricultural residues and biomass into stable carbon amendments designed to improve soil health, increase water retention, and support long-term carbon sequestration.

As a biochar producer, Sitos Group works directly with growers to design, manufacture, and apply biochar that meets rigorous quality, safety, and performance standards. The company emphasizes feedstock traceability, emissions compliance, and consistent product specifications to ensure agronomic reliability and measurable climate benefits.

In addition to production, Sitos Group supports integrated, on-farm biochar systems that reduce transportation emissions and promote circular resource use within agricultural operations. Through these efforts, the company aims to strengthen farm resilience, reduce open burning and waste biomass, and contribute to California's climate and soil health objectives.

**U.S. Biochar Coalition**  
200 Massachusetts Ave NW, Suite 320,  
Washington, DC 20001 USA  
[www.usbiocharcoalition.org](http://www.usbiocharcoalition.org)  
[info@usbiocharcoalition.org](mailto:info@usbiocharcoalition.org)

Sitos Group brings long-term practical experience in both biochar manufacturing and field application, and is committed to policies that support innovation, environmental integrity, and equitable access to climate-smart agricultural practices.

After reviewing the proposed biochar provisions, we respectfully offer the following recommendations.

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### **1. Reconsider the 6 Tons per Acre Maximum Application Rate**

The draft guidelines establish a maximum eligible biochar application rate of 6 tons per acre. While we recognize the importance of consistency and fiscal oversight, agronomic data and field experience suggest that measurable soil health and carbon benefits may extend beyond this threshold in certain soil types and production systems.

Over the past ten years, we have proven, particularly in low-organic-matter soils, higher application rates — up to 10 tons per acre — have demonstrated improvements in soil carbon storage, water retention, and nutrient efficiency, all resulting in increased yield. A uniform cap may therefore limit the effectiveness of the practice in achieving intended climate and soil health outcomes.

We recommend that CDFA either:

- Increase the eligible maximum application rate to 10 tons per acre; or
- Provide a pathway for applicants to justify higher rates based on site-specific soil conditions, supported by soil analysis, modeling tools, or a Technical Assistance Provider's agronomic plan.

Allowing science-based flexibility would maintain program integrity while enabling growers to implement biochar at rates aligned with demonstrated soil needs.

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### **2. Expand Eligibility to Include Biochar Produced Onsite**

The draft guidelines limit eligible biochar to material produced offsite. We encourage CDFA to broaden eligibility to include onsite-produced biochar, provided it meets all established quality, emissions, and safety criteria.

Many agricultural operations are investing in integrated systems that convert orchard removals, crop residues, or other biomass into biochar directly on the farm. These systems can:

- Reduce transportation emissions associated with hauling feedstock and finished product
- Improve transparency and traceability of feedstock sources
- Support localized, circular resource use
- Strengthen rural innovation and resilience

Excluding onsite production based solely on location may inadvertently disadvantage producers adopting climate-efficient, distributed models. We recommend that eligibility be determined by adherence to performance and environmental standards rather than the geographic location of production.

Ensuring a level playing field across production models will better support innovation while preserving program accountability.

## **Conclusion**

We commend CDFA for its ongoing leadership in implementing climate-smart agricultural programs. By revisiting the application rate cap and allowing qualified onsite biochar production, the Healthy Soils Program can further enhance its impact on carbon sequestration, soil function, and farm sustainability.

Thank you for considering these comments. We would welcome the opportunity to provide additional technical information or participate in future stakeholder discussions.

Respectfully submitted,



Mayo P. Ryan

CEO

Sitos Group, LLC

Email: [mayor@sitos.earth](mailto:mayor@sitos.earth)

Cell: (559) 288-4986

**U.S. Biochar Coalition**  
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**From:** Paul Ryan <enviropablo@sbcglobal.net>  
**Sent on:** Thursday, February 19, 2026 12:43:01 AM  
**To:** CDFA Agricultural Resilience & Sustainability  
Office@CDFA <cdfa.oars@cdfa.ca.gov>  
**Subject:** : Public Comments for Healthy Soils Program (HSP) and State Water Efficiency  
and Enhancement Program (SWEEP) Block Grants  
**Attachments:** Strawman ltr.docx (32.56 KB)

C a u t i o n ! [- External Email -] This email originated from outside of our CDFA organization. Do not click links or open attachments unless you recognize the sender and know the content is expected and is safe. \* \* \* Use the Phish Alert Report button to report suspicious emails. \* \* \*

OARS Staff;

I have significant concerns about the opportunities afforded socially disadvantaged farmers and ranchers and their communities that face a disproportionate risk of sensitivity in understanding the Block Grant application procedure requirements. This Block Grant solicitation is complex; therefore, it is important to provide public webinars and preapplication conferencing to potential Block Grant Recipients, Technical Assistance Providers, and Beneficiary Farmers and Ranchers prior to the formal Block Grant solicitation and California Grants Portal posting.

Attached is a letter explaining my concerns.

Respectfully,

Paul Ryan  
951/288-5049

**P. F. Ryan and Associates, Inc.**  
**environmental and management consulting**

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February 18, 2026

**VIAE-MAIL**

Virginia Jameson  
Deputy Secretary  
Climate and Working Lands  
California Department of Food and Agriculture

E-Mail: [OARS@cdfa.ca.gov](mailto:OARS@cdfa.ca.gov)

**Re: Public Comments for Healthy Soils Program (HSP) and State Water Efficiency and Enhancement Program (SWEEP) Block Grants**

Dear Virginia Jameson and staff,

In recognition of rapidly expanding interests and activities surrounding the Healthy Soils Program (HSP) and State Water Efficiency and Enhancement Program (SWEEP) Block Grants formal announcement and solicitation of the Draft Application Guidelines, there is a need for introductory workshops and Zoom conferencing. Public participation and coordination is needed to optimize Grant Program awareness. Many potential on-farm representatives from the Inland Empire with major interests in soil health and water efficiency desire the opportunity to receive advice and input as to how one can ensure greater synergistic participation in the grant solicitation process.

Farmers and Ranchers in the Inland Empire recognize that many interested parties, as potential on-farm grant participants, pledge their full engagement in leveraging their individual capacities to: develop applications that reflect the awareness that soil is a living ecosystem; we promote the idea that soils can be managed to be healthy; they unite in their efforts to understand and disseminate knowledge of soil health as essential for sustaining the basic necessities of life – food, water, air, and shelter.

Pursuant to their pledge, it is recognized the California's Healthy Soils Initiative is a collaboration of state agencies and departments, led by the California Department of Food and Agriculture, to promote the development of healthy soils on California's farm and ranchlands. Innovative farm and ranch management practices contributing to building adequate soil organic matter that can increase carbon sequestration and reduce overall greenhouse gas emissions.

The Inland Empire farmers and ranchers recognize the Healthy Soils Initiative is a key part of California's strategy to reduce greenhouse gas emissions by increasing carbon sequestration on farmland and in and on natural and working lands.

A key theme of strategic priorities throughout the Ag Vision process has been a desire among farmers and ranchers to be valued, recognized, and viewed as essential to the fabric of California. And while good work abounds, growing and earning this recognition requires a renewed commitment from agriculture to serve as good stewards of the public trust now and in the future.

The Ag Vision process has identified five key priority areas where the California Department of Food and Agriculture can best support the vision:

- Foster climate-smart, resilient, and regenerative food systems—Support efforts that improve agriculture’s impact on the environment, encourage wise stewardship of water and natural resources, eliminate waste and are regenerative, e.g., practices that enhance ecosystems and improve the land.
- Build healthy, local communities—Invest in local and socially disadvantaged communities—with emphasis on the diverse populations who often work at and with, and live adjacent to California farms—while supporting equity and the California economy through nutritious, California-grown farm products.
- Drive next-generation talent and tools—Support workforce development programs aimed at attracting, supporting, and providing high-quality jobs and leadership opportunities for a diverse agricultural workforce, while also driving research and real-time feedback from farmers and ranchers to stimulate and accelerate innovation to solve problems and build opportunities.
- Enhance understanding of agriculture—Serve as the voice for California farmers and ranchers within the administration and with other agencies, and support the engagement of urban and rural audiences.
- Collaborate on smarter regulations—Work with other state agencies, stakeholders, and the administration to explore and support smarter regulations that rethink ways to both meet public obligations and support farmers with simplified, less expensive regulatory compliance, reporting, and implementation.

State agencies, departments and boards met and agreed to the set of five priority actions for the Healthy Soils Vision by endorsing the following:

- Protect and restore soil organic matter in California’s soils.
- Identify sustainable and integrated financing opportunities to facilitate healthy soils.
- Provide for research, education and technical support to facilitate healthy soils.
- Increase governmental efficiencies to enhance soil health on public and private lands.
- Promote interagency coordination and collaboration to support soils and related state goals.

Given the totality and the complexity of the Health Soil Program (HSP) and State Water Efficiency and Enhancement Program (SWEEP), along with the requirements for regulatory alignment and compliance, it becomes evident that public webinars and pre-application conferencing is necessary to address areas of interest and concern prior the Block Grant solicitations or posting the same on the California Grants Portal.

The public webinars and pre-application conferencing should include the following:

- Clarifying Requirements: Explaining the Request for Applications (RFA) instructions and program guidelines.
- Technical Assistance: Providing guidance on how to navigate application and forms
- Q&A Sessions: Answering specific technical questions from prospective applicants to resolve ambiguities before submission.
- Encouraging Compliance: Highlighting eligibility criteria, such as Concept Proposal structures and required supporting documentation.
- Discuss the importance of working with organizations such as Resource Conservation Districts, Community Alliance with Family Farmers, University of California Cooperative Extensions, Tribal Governments to form networks and or partnerships.

While I understand and appreciate the importance of procedural processes, I have significant concerns about the opportunities afforded socially disadvantaged farmers and ranchers and their communities that face a disproportionate risk of sensitivity in understanding the Block Grant application procedure requirements. This Block Grant solicitation is complex; therefore, it is important to provide public webinars and preapplication

conferencing to potential Block Grant Recipients, Technical Assistance Providers, and Beneficiary Farmers and Ranchers prior to the formal Block Grant solicitation and California Grants Portal posting.

As an environmental and management practitioner involved with policy and regulatory affair in water, air, soil, and health, it is important that we assist different people groups to navigate the plethora of complexity in the regulated environment.

Thank you for your consideration of my comments, I look forward to your response. Please contact me if you have any questions.

Respectfully,

A handwritten signature in black ink, appearing to read "Paul F. Ryan". The signature is somewhat stylized and includes a horizontal line that extends to the left.

Paul F. Ryan, BS, MPPA, REHS  
President  
PF Ryan and Associates, Inc.

cc: Dr. Nin Bingham, CDFA  
Dr. Tawny Mata, CDFA  
Dr. Michael Wolff, CDFA  
Scott Weeks, CDFA  
Patrick Mitchell, CAFF-IE  
Lynn Summers, CAFF-IE



# Monterey One Water

## Providing Cooperative Water Solutions

ADMINISTRATIVE OFFICE: 5 Harris Court, Bldg D, Monterey, CA 93940-5756

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February 18, 2026

California Department of Food and Agriculture  
Office of Agricultural Resilience and Sustainability  
Via Email Only

**RE:** Recommendations for Proposition 4 (2024) Healthy Soils, Water Efficiency and Enhancement Program Expenditures

Dear OARS,

On behalf of Monterey One Water (M1W), I write today to offer recommendations on how Proposition 4 (Prop 4) funding designated for the Healthy Soils and Water Efficiency and Enhancement Programs may be allocated to highly impactful initiatives like the production of biochar from wastewater solids and organic waste.

M1W is the wastewater treatment provider in northern Monterey County, serving more than 285,000 residents and almost 7,000 businesses. Each day, we treat approximately 17 million gallons of wastewater through a liquid treatment process and a solids treatment and disposal system. Wastewater operations are energy-intensive, and significant equipment upgrades currently underway will increase treatment plant energy efficiency and improve system reliability.

A byproduct of water treatment systems is biosolids, an under-utilized resource stream that offers a unique opportunity to convert environmental pollutants into a valuable commodity. M1W is embarking on an extensive Solids Handling and Resource Recovery Improvements Project (Project) to capitalize on this resource, made possible by high-efficiency equipment upgrades and a new food waste diversion service that combines wastewater biosolids with food waste. By expanding organic waste diversion services, M1W established a regional resource for neighboring jurisdictions and waste generators seeking to comply with California organics diversion and climate regulations.

This Project will entail several elements, beginning with the replacement of screw presses with modern equipment for dewatering and drying biosolids, increasing the total solids content of the resulting pressate to greater than 50%. Installation of a nutrient recovery system will follow to remove nutrients from pressate and convert it to commercial-grade fertilizer. M1W then will add an advanced process such as high-temperature pyrolysis to destroy the fluorinated chemicals and other pollutants present in biosolids and convert it into biochar. The current estimate for planning level total cost is \$49 million.

Investment from Prop 4 funds in a project like this will not only benefit our soils, but also maximize resource recovery, support a circular-economy approach to waste streams, and benefit the affordability of essential public health services. Ultimately, this Project is expected to offset 162 million pounds of CO<sub>2</sub> annually and contribute to the sustainability of agricultural and drinking water supplies in the region. These efforts will create a local source of biochar for sustainable agricultural operations and benefit soil health in California through carbon sequestration and reduction of land-based greenhouse gas emissions. Given that M1W's existing infrastructure and processes provide a strong foundation for



# Monterey One Water

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the addition of advanced treatment technologies, we are uniquely positioned to lay the groundwork for collaboration between the wastewater treatment and agricultural sectors. Furthermore, there is an opportunity to develop significant local demand for biochar, as one of the two major regional economic drivers is agriculture.

Designating Prop 4 funds to infrastructure converting municipal biosolids to biochar will enable early adopters of advanced biosolids processing to build a market for the resources necessary for sustainable agriculture and resilient soil health. Funding for operations like M1W's Project will create a major incentive for agencies to pursue beneficial reuse of biosolids and other organic waste.

Thank you for the opportunity to provide input on the CDFA's funding priorities for these vital programs. If you have any questions about our comments, please contact me at [rachel@my1water.org](mailto:rachel@my1water.org).

Sincerely,

Rachel Gaudoin

Community and Legislative Affairs Manager

cc: Senator John Laird  
Assemblymember Dawn Addis  
Assemblymember Robert Rivas



February 18, 2026

Ms. Virginia Jameson  
California Department of Food & Agriculture  
Office of Agricultural Resilience & Sustainability  
1220 N Street  
Sacramento, CA 95814

Submitted via email to: [cdfa.oars@cdfa.ca.gov](mailto:cdfa.oars@cdfa.ca.gov)

Submitted online via the [Public Comment Portal](#)

**Re: CASA's input on CDFA's Healthy Soils Program (HSP) & State Water Efficiency & Enhancement Program (SWEEP) Block Grant Draft Application Guidelines & Draft Grant Award Procedures (GAP)**

Ms. Jameson:

The California Association of Sanitation Agencies (CASA) appreciates this opportunity to comment on CDFA's Draft Applicant Guidelines and Draft Grant Award Procedures. CASA is an association of local clean water agencies representing over 90 percent of the sewered population of California. Our members engage in recovering resources from the wastewater treatment process, including recycled water, biogas for production of renewable energy or low carbon fuel, biosolids for an organic soil amendment, and other valuable resources. Our members support the circular water economy while also remaining compliant with water and air quality regulations and fulfilling our mission to protect public health and the environment.

Our members are positioned to support the state in achieving carbon neutrality by 2045 by:

- Land applying biosolids to improve soil health and increase carbon sequestration (directly supporting the objectives of the Healthy Soils Initiative, Natural & Working Lands Climate Smart Strategy, and the Climate Resilience Strategy for California Agriculture)
- Accepting diverted organic waste from landfills to reduce short-lived climate pollutant (SLCP) emissions and establish a circular economy aligned with CalRecycle's Zero Waste Plan
- Recovering and using renewable biomethane to reduce the carbon intensity of vehicle fuel and produce clean, renewable energy

CASA fully supports CDFA's priorities to "foster climate-smart, resilient and regenerative food systems" and "protect and support food and natural systems, as well as establish agricultural practices resilient to a changing climate to bolster community resilience" through funding eligible HSP and SWEEP projects.

For decades, biosolids have been land applied across California and the broader United States, recycling carbon, nitrogen, organic matter back to the soil to avoid interrupting natural cycles and rebuild soil health. Over 90 percent of California's municipal wastewater solids are treated through anaerobic digestion, from which highly regulated biosolids (or anaerobic digestate) are generated for beneficial use. Land application of biosolids (anaerobic digestate) is recognized as a HSP conservation management practice that builds soil health and resistance to impacts of climate change. As we make strides to establish a circular economy, our resource recovery systems are designed with this goal in mind. **There will always be a source of biosolids with the existence of society – we will all continue to flush our toilets and recycle carbon and nutrients.**

In your draft Climate Resilience Strategy for California Agriculture, you highlight the steps CalRecycle is taking toward a "circular economy" (being established by the Zero Waste Plan), transitioning from a disposal-based system to a circular economy that collects and reuses what would have been waste and turns it into a product that can benefit (for example) California soils and agriculture. Beneficial use of biosolids that are produced as an integral part of the wastewater treatment process to improve soil health



and crop yield represents a pure example of a circular economy. Land applying biosolids to soils supports all objectives of the Healthy Soils Program and Natural and Working Lands Climate-Smart Strategy.

Existing research quantifies the carbon sequestration that can be achieved through biosolids land application and identifies the numerous co-benefits, including restoring soils through returning nutrients back to the land and rebuilding organic matter, improving water holding capacity and crop yield. In turn, the practice of land application of biosolids offsets the need for energy-intensive synthetic fertilizer and reduces the need for irrigation, producing crops that are more resilient to drought.

We provide the following citations of peer-reviewed scientific research for your reference and use. Specifically, we list citations that document benefits of land application of biosolids to soils, including carbon sequestration and offsets in synthetic fertilizer, as well as ways biosolids build drought resilience.

### **Crop Production Benefits**

- Ippolito, J. and Barbarick, K.A. (2022). *The Clean Water Act and biosolids: A 45-year chronological review of biosolids land application research in Colorado*. Journal of Environmental Quality. <https://doi.org/10.1002/jeq2.20376>
- Mitchell, S.M., Yorgey, G. and Kruger, C (2016). [Guide to Biosolids Quality](#). Washington State University Extension.

### **Carbon Sequestration**

- Villa, Y. and Ryals, R. (2021). *Soil Carbon Response to Long-Term Biosolids Application*. Journal of Environmental Quality. <https://doi.org/10.1002/jeq2.20270>
- Tian, G., Granato, T. C., Cox, A. E., Pietz, R. I., Carlson Jr, C. R., & Abedin, Z. (2009). *Soil carbon sequestration resulting from long-term application of biosolids for land reclamation*. Journal of Environmental Quality, 38(1), 61-74. <https://doi.org/10.2134/jeq2007.0471>
- Torri, S. I., Corrêa, R. S., & Renella, G. (2014). *Soil carbon sequestration resulting from biosolids application*. Applied and Environmental Soil Science. <https://doi.org/10.1155/2014/821768>
- Antonelli, P. M., Fraser, L. H., Gardner, W. C., Broersma, K., Karakatsoulis, J., & Phillips, M. E. (2018). *Long term carbon sequestration potential of biosolids-amended copper and molybdenum mine tailings following mine site reclamation*. Ecological Engineering, 117, 38-49. <https://doi.org/10.1016/j.ecoleng.2018.04.001>

### **Offsetting Synthetic Fertilizer and Increasing Drought Resilience**

- Broderick, S.; Evans, W., (2017). *Biosolids Promote Similar Plant Growth and Quality Responses as Conventional and Slow-release Fertilizers*. American Society of Horticulture Science, Vol 27: Issue 6, 794-804.
- Brown, S.; Beecher, N.; Carpenter, A., (2010). *Calculator Tool for Determining Greenhouse Gas Emissions for Biosolids Processing and End Use*. Environmental Science & Technology, 44, 9509–9515.
- Sullivan, D.; Cogger, C.; Bary, A., (2015). *Fertilizing with Biosolids*. A Pacific Northwest Extension Publication Oregon State University, Washington State University, University of Idaho.
- Evanylo, G. et al. (2006). *Biosolids Impact on Tall Fescue Drought Tolerance*; Journal of Residuals Science & Technology, Vol 3, No 2.
- Zhang, X. et al (2008). *Impact of Biosolids on Hormone Metabolism in Drought-Stressed Tall Fescue*. Crop Science, Vol. 49.



In summary, beneficial use of biosolids is a critical path to ensuring community resilience through a circular economy and achieving carbon neutrality, while remaining compliant with existing federal and local water quality, air quality, and land related regulations. If we are truly working to safeguard the needs of future generations, society must prioritize conservation management practices that preserve nature's circular carbon and nitrogen cycles to avoid putting long-term soil and crop resilience at risk.

Our members share CDFA's objective – to bolster community resilience through protecting local soil and food systems, as well as implement practices that help farmers and communities withstand and adapt to climate change. Please contact us with any questions regarding our comments or inquiries to meet at (916) 446-0388 or email us at [sdeslauriers@casasweb.org](mailto:sdeslauriers@casasweb.org) and [mlono-batura@casaweb.org](mailto:mlono-batura@casaweb.org).

Sincerely,

A handwritten signature in black ink that reads 'Sarah A. Deslauriers'.

Sarah A. Deslauriers, P.E., ENV SP  
Director of Air, Climate, & Energy Programs

A handwritten signature in black ink that reads 'Maile Lono-Batura'.

Maile Lono-Batura  
Director of Renewable Resource Programs

cc: Adam Link, Executive Director, CASA



February 18, 2026  
Office of Agricultural Resilience and Sustainability  
California Department of Food and Agriculture  
1220 N Street  
Sacramento, CA 95814

Re: Comments on HSP and SWEEP Block Grants Draft Application Guidelines, Draft GAP Manual, and Draft Practice Guidelines

Dear OARS staff,

Thank you for the opportunity to comment on the Healthy Soils Program (HSP) & State Water Efficiency and Enhancement Program (SWEEP) Block Grants Draft Application Guidelines, Draft GAP Manual, and Draft Practice Guidelines. American Farmland Trust (AFT) supports CDFA's continued leadership in advancing soil health, water conservation, energy efficiency, and climate outcomes for California agriculture.

On behalf of American Farmland Trust, I write to provide feedback on the above-mentioned program guidelines. In addition to the comment letter we co-signed alongside California Climate and Agriculture Network (CalCAN) featuring more global feedback, we would like to additionally extend our support specifically for the inclusion of biochar as a practice eligible for the Healthy Soils Program incentive programs.

AFT has engaged in biochar [research](#), field [implementation](#), [resource development](#), [supply chain engagement](#), and [service provider capacity building](#) to help inform practical deployment of this practice. As biochar is integrated into HSP, we offer the following high-level recommendations to support effective, equitable, and scalable implementation:

### **1. Align Biochar Eligibility with Clearly Defined Quality Standards**

To ensure consistency with broader HSP practice design principles, biochar eligibility should be tied to recognized quality criteria (e.g., international biochar standards or performance-based metrics) that reflect safe and agronomically effective material. This aligns with how HSP guidance frames material characteristics and practice fidelity across other amendments.

### **2. Support Capacity Building for Service Providers and Technical Assistance**

The 2026 guidelines appropriately emphasize service provider roles in practice design and verification. Given biochar's relative novelty for many TAPs, additional training, guidance documents, and reference materials should be developed and shared. AFT has already

supported foundational training and technical exchange in an otherwise nascent California landscape, and we strongly encourage CDFA to continue orienting the provider community.

### **3. Provide Practical Decision-Support and Verification Pathways**

Biochar practice design should leverage accessible decision-support resources that help applicants and implementers translate soil and cropping system data into appropriate application planning. Where the Practice Guidelines reference tools like Web Soil Survey, Biochar Atlas, and Biochar Selection Tool, it will be critical to articulate how these integrate with biochar suitability in California contexts, thus minimizing confusion and redundant effort.

### **4. Focus Verification on Outcomes Consistent with Program Goals**

Verification expectations should reflect both fidelity to practice design and alignment with HSP's objectives (ie. increased soil organic matter, enhanced water-holding capacity, and climate benefits). Flexibility in verification documentation – such as product certification records, application records, and photos tied to approved practice design – will help streamline reimbursement without sacrificing rigor.

### **5. Encourage Adaptive Feedback Loops Between Practice Application and Research**

Recognizing that biochar understandings continue to evolve, we encourage mechanisms (such as aggregated data sharing and periodic review) that inform ongoing refinement of practice parameters. This is in alignment with how the guidelines emphasize continuous learning and improvement for newer practices.

In closing, AFT commends CDFA for advancing biochar within the Healthy Soils Program. With clear standards, thoughtful capacity support, and alignment of decision-support and verification expectations, biochar represents another tool in the soil health toolbox that can contribute meaningfully to soil health, resilience, and climate mitigation outcomes across California's diverse agricultural landscapes. Inclusion in HSP plays a powerful role in helping drive change across researcher, service provider, industry, and producer spaces that is critical.

Thank you for considering these comments. We look forward to continued engagement.

Sincerely,

*Tom Stein*

Tom Stein  
California Regional Director  
American Farmland Trust

# **Healthy Soils Program (HSP) & State Water Efficiency and Enhancement Program (SWEEP) Block Grants Draft Application Guidelines**

## **Comment 1 (Page 6-7) – Block Grant Participants and Eligibility**

### **Issue Identified:**

The draft guidelines define lead applicants and grant beneficiaries largely in procedural terms, without explicit guidance that lead applicants can support continuation and scaling of the most innovative growers and partner networks addressing agricultural water and soil challenges at scale.

Early data from select California and international growers and technical partners indicate measurable improvements in soil organic matter, water-use efficiency, and crop productivity. While partial solutions have been demonstrated, additional research, scaling, and system-level coordination are required to fully realize basin-wide impact. The current structure may unintentionally encourage incremental, farm-by-farm interventions rather than support strategic, coordinated learning and adoption networks that integrate both SWEEP and HSP objectives.

### **Recommended Language Addition**

**Add a statement in the Eligibility / Lead Applicant Section:**

**“Lead applicants are encouraged to support and coordinate networks of growers and technical partners that have demonstrated early success in improving soil health, soil organic matter, water-use efficiency, and crop productivity. Projects may aim to explore combining innovations and scientifically verifying outcomes at scale. Technical assistance should include reputable monitoring, reporting, and verification (MRV) experts to document system-level impacts. While program outcomes may vary, proposals should reflect objectives to test and establish new systems of practices and technologies that could transform crop production, profitability, and resilience in California.”**

### **Rationale / Justification**

#### **1. Continuation of Proven Innovation**

- **Supports growers and partners who have already demonstrated partial, promising results, ensuring SWEEP/HSP funds accelerate adoption rather than starting from scratch.**

- Encourages a continuation and expansion of early innovation from growers and technical partners.
2. **Scientific Verification**
    - Emphasizes the importance of MRV and rigorous documentation to establish credible, scalable outcomes in both soil health and water efficiency.
    - Positions SWEEP/HSP to fund learning at scale rather than untested or speculative practices.
  3. **System-Level Potential**
    - Encourages coordination across districts and networks, enabling broader evaluation of SOM growth, applied water efficiency, and crop performance.
    - Recognizes that transformation of crop systems is a possible, not guaranteed, outcome, aligning with scientific opportunity and prudence.
  4. **Program Alignment**
    - Ensures SWEEP/HSP functions as a strategic enabler for basin-scale learning, adaptation, and integrated water-soil management.
    - Provides a neutral, scientifically grounded rationale for multi-season, multi-farm, and aggregated approaches discussed in subsequent comments.

## **Comment 2 (Page 6-7) – District-Level and Aggregated Applications**

### **Issue Identified:**

**In groundwater-constrained basins, achieving meaningful water savings and soil health improvements may require coordinated implementation across irrigation districts, water districts, or commodity groups. Farm-level participation alone may not achieve basin-scale impact under projected pumping caps.**

**The draft guidelines appear primarily structured around individual farm-level applications, which may unintentionally limit coordinated, district-scale adoption.**

### **Recommended Language Addition**

**“Irrigation districts, water districts, commodity associations, and coordinated grower groups may submit aggregated proposals on behalf of multiple producers, provided project-level implementation and performance metrics, including soil organic matter growth and water-use efficiency, are documented at the farm scale.”**

## **Rationale / Justification**

**Allowing aggregated applications would:**

- **Accelerate adoption in groundwater-constrained regions**
- **Reduce administrative burden on individual growers**
- **Improve alignment with basin-scale sustainability objectives, including soil organic matter accumulation and water efficiency**
- **Enable coordinated compliance strategies in areas experiencing subsidence or projected pumping reductions**

**This structure preserves accountability at the farm level while enabling regional, system-level implementation efficiency, supporting both SWEEP and HSP objectives.**

### **Comment 3 (Page 8-9) – Phase 2: On-Farm Project Implementation and Outcomes**

**Issue Identified:**

**The draft guidelines describe on-farm implementation primarily through discrete irrigation and efficiency practices (e.g., pump upgrades, drip conversion, soil moisture sensors, variable frequency drives). While these practices are valuable components, the current structure may unintentionally constrain integrated systems approaches that combine irrigation hardware, monitoring networks, fertigation optimization, nutrient source control, soil health management, and energy efficiency into coordinated water–nutrient–crop management systems.**

**In several California groundwater basins experiencing land subsidence and projected pumping allocations below 1 acre-foot per acre, incremental adoption of individual practices may be insufficient to achieve compliance within required timeframes. System-level replacement approaches may be necessary to deliver accelerated and compounded outcomes, including soil organic matter growth and water-use efficiency gains.**

### **Recommended Language Addition**

**“Integrated System Test and Deploy Projects:**

**Proposals that deploy multiple irrigation, nutrient management, soil health, monitoring, and energy-efficiency technologies as a coordinated system may be eligible, provided the applicant demonstrates that the integrated system achieves water savings, soil organic matter improvements, greenhouse gas reductions, and climate resilience outcomes equal to or greater than the sum of individual eligible**

practices. Applicants may provide justification for integrated quantification methodologies where outcomes result from system interactions.”

#### **Rationale / Justification**

- **Aligns program structure with statutory outcome-based intent under Proposition 4**
- **Enables block grant recipients, including irrigation districts, to coordinate multi-farm adoption strategies**
- **Supports compliance in basins facing structural pumping reductions and subsidence risk**
- **Clarifies eligibility without expanding the program beyond statutory authority**
- **Reinforces system-level implementation models in which irrigation districts or technical assistance providers organize coordinated SOM and water efficiency adoption across multiple beneficiaries**

#### **Comment 4 (Page 8-9) – Timeline and Implementation Scale**

##### **Issue Identified:**

**In groundwater-constrained basins facing near-term pumping reductions or compliance deadlines, incremental practice adoption may not achieve required water savings and soil improvement outcomes within necessary timeframes. Comprehensive system replacement projects may require phased implementation across multiple growing seasons due to infrastructure, procurement, and crop-cycle considerations.**

**The current draft guidelines appear primarily structured around shorter-duration projects.**

##### **Recommended Language Addition**

**“Multi-year, phased system scientific establishment projects may be eligible when applicants demonstrate basin-level compliance timelines, subsidence mitigation needs, or other documented urgency, including objectives for soil organic matter growth and water-use efficiency, requiring accelerated adoption at scale.”**

#### **Rationale / Justification**

##### **Allowing phased, multi-year implementation would:**

- **Support timely compliance in groundwater-constrained basins**
- **Enable comprehensive system modernization rather than incremental retrofits**
- **Improve durability of water savings and soil improvement outcomes**

- **Increase program effectiveness in regions experiencing subsidence or pumping reductions**

**This flexibility would allow SWEEP/HSP to function as a strategic resilience and transition tool while maintaining accountability and performance reporting, linking water-use efficiency to measurable soil health improvements.**

#### **Comment 5 (Page 26-27, Appendix A & C) – Scoring Criteria: Multi-Objective Performance**

##### **Issue Identified:**

**The draft scoring criteria appear to evaluate practices independently (e.g., water savings, greenhouse gas reductions, energy efficiency), which may unintentionally disadvantage proposals that integrate multiple practices into coordinated systems delivering synergistic outcomes. Without recognizing system-level interactions, projects demonstrating simultaneous gains in water efficiency, soil organic matter growth, nutrient management, and climate resilience may not receive appropriate credit.**

##### **Recommended Language Addition**

**“Projects demonstrating integrated system performance, including measurable water savings, soil organic matter improvements, greenhouse gas reductions, and nutrient management co-benefits, may receive additional points for multi-objective optimization. Scoring should recognize synergies that result from system-level implementation rather than single-practice adoption.”**

##### **Rationale / Justification**

- **Encourages innovative, coordinated system designs that achieve multiple objectives simultaneously**
- **Aligns scoring with Proposition 4 climate resilience goals and integrated SWEEP/HSP objectives**
- **Incentivizes block-scale and multi-farm approaches, reinforcing district-level adoption and MRV-supported measurement**
- **Explicitly includes soil organic matter growth and water-use efficiency as measurable outcomes, creating a direct link between technical merit and program objectives**

