
From: Shannon <morris.sk@gmail.com>
Sent: Monday, August 17, 2020 9:19 AM
To: CDFA OEFI@CDFA <CDFA.OEFI@cdfa.ca.gov>
Subject: Healthy soils organic transition option

CAUTION : [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.

Good morning-

I am writing in support of including an organic transition option within the Healthy Soils Program. It makes sense to have an organic option within the Healthy Soils Program since building soil organic matter is an essential part of organic farming. Having this option will greatly help farmers transitioning, as the transition period can be economically challenging. Any programs to help in this process goes a long way.

Additionally, having an organic option will only strengthen the effects of the Healthy Soils Program because organic farmers will continue these practices, continue building soil organic matter, continue sequestering carbon.

I strongly urge you to add an organic option to the Healthy Soils Program to widen the impact the program has for farmers and for California in general.

Best,

Shannon Morris
Santa Cruz, CA

From: Vineeta Gupta <vineeta123@yahoo.com>
Sent: Monday, August 17, 2020 11:09 AM
To: CDFA OEFI@CDFA <CDFA.OEFI@cdfa.ca.gov>
Subject: Healthy Soils Program, Organic Transition, Pls support

CAUTION : [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.

- The Healthy Soils Program needs to include an organic transition option because organic farming sequesters carbon and helps mitigate climate change in addition to numerous other environmental and economic benefits.
- Transitioning to organic is challenging and a little bit of support will go a long way to helping more farmers and ranchers become organic.
- I would like to see more organic acreage in California to reduce use of toxic pesticides, soil health, farm worker health, insect wildlife health.

Thanks,
Vineeta Gupta

From: Cody Harrison <charrison@corona-enterprises.com>

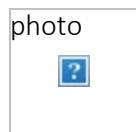
Sent: Wednesday, August 19, 2020 4:45 PM

To: CDFA OEFI@CDFA <CDFA.OEFI@cdfa.ca.gov>

Subject: Re: [New post] Healthy Soils Organic Transition Option Moves Forward: Comment Now

CAUTION : [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.

I support the idea of an organic transition support program under HSP, however, I recommend the program support farmers that want to leapfrog Organic and go straight for Patagonia's new Regenerative Organic Certification.



Cody Harrison

Beyond Sustainability Specialist, Corona Enterprises

434-242-6879 | www.corona-enterprises.com | [Portfolio](#)



On Mon, Aug 17, 2020 at 1:12 PM Kevin Muno <kevin@ecologyartisans.com> wrote:

I think it would be awesome if we could get paid to transition to organic.

----- Forwarded message -----

From: **CalCAN** <donotreply@wordpress.com>

Date: Mon, Aug 17, 2020 at 10:02 AM

Subject: [New post] Healthy Soils Organic Transition Option Moves Forward: Comment Now

To: <kevin@ecologyartisans.com>

Guest Blogger posted: "This post was written by Jane Sooby at CCOF, a CalCAN Coalition member."

Numerous scientific studies show that organic farming improves soil health and builds soil organic matter, which sequesters carbon in the soil and helps mitigate climate change.

"

New post on **CalCAN**



[Healthy Soils Organic Transition Option Moves Forward: Comment Now](#)

by [Guest Blogger](#)

This post was written by Jane Sooby at [CCOF](#), a CalCAN Coalition member.

Numerous scientific studies show that organic farming improves soil health and builds soil organic matter, which sequesters carbon in the soil and helps mitigate climate change.

This makes organic farming a good match for CDFA's [Healthy Soils program](#), which offers 3-year grants to farmers and ranchers to implement conservation practices that

build soil health, sequester carbon, and reduce greenhouse gas emissions.

In addition, organic farming is better for the environment because organic growers don't use synthetic pesticides that impact human health and reduce pollinator populations.

CCOF has been working to gain approval from CDFA to add an Organic Transition Option to the Healthy Soils program. CDFA currently is [accepting comments](#) on CCOF's idea through Aug. 31.

CCOF's proposed [Organic Transition Option](#) would:

- Offer a small stipend to farmers and ranchers who want to transition to organic to help them develop an organic system plan. The stipend would be in addition to payment for conservation practices
- Help offset the financial risk of the 3-year transition period, especially important for small-scale, beginning, and limited resource farmers
- Increase the likelihood that the grant recipient will continue using conservation practices after the term of the grant because they will be required to under the organic standards

Please submit a comment to CDFA supporting the Organic Transition Option.

Suggested points to make in your comment include:

- The Healthy Soils Program needs to include an organic transition option because organic farming sequesters carbon and helps mitigate climate change in addition to numerous other environmental and economic benefits.
- Transitioning to organic is challenging and a little bit of support will go a long way to helping more farmers and ranchers become organic.
- Reasons that you would like to see more organic acreage in California.

Comments will be reviewed by members of the Environmental Farming Act Science Advisory Panel, which advises the Secretary of Food and Agriculture on the Healthy Soils Program. The Panel is likely to make a final decision at its October meeting.

Submit comments by email to cdfa.oefi@cdfa.ca.gov by 5 pm on Monday, Aug. 31, 2020.

For additional information contact Jane Sooby, CCOF senior outreach & policy specialist, at jsooby@ccof.org or by phone at 831-425-7205.

Guest Blogger | August 17, 2020 at 10:00 am | Tags: [irrigation efficiency](#)
| URL: <https://wp.me/pap9il-3Bo>

Comment

[See all comments](#)

[Unsubscribe](#) to no longer receive posts from CalCAN.

Change your email settings at [Manage Subscriptions](#).

Trouble clicking? Copy and paste this URL into your browser:

<https://calclimateag.org/healthy-soils-organic-transition-option-moves-forward-comment-now/>

--

Cheers,

Kevin Muno
President, Ecology Artisans
ecologyartisans.com

760-600-0248

From: Cameron Newell <cameron.newell@xerces.org>

Sent: Friday, August 28, 2020 3:08 PM

To: CDFA OEFI@CDFA <CDFA.OEFI@cdfa.ca.gov>

Subject: Inclusion of Bee Better Certified Option along with the Organic Transition Option under CDFA's TAP

CAUTION : [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.

To whom it may concern,

I am writing to provide comment on the proposed inclusion of the Organic Transition Plan to the CDFA HSP Technical Assistance Program.

Organic farming is not the only system that can aid in achieving the CDFA goals set forth in the HSP. Other programs such as the Xerces Societies Bee Better Certified program (available to both organic and conventional farmers) encourage increased adoption and continued implementation of many of the practices funded under CDFA HSP, including cover cropping, conservation cover, field borders, hedgerow planting to name a few. In fact, through the habitat requirements of Bee Better Certified a combination of these practices is mandated in order to achieve certification. Including a Bee Better Certified Option along with the Organic Transition Option under CDFA's Technical Assistance Program would further facilitate the achievement of the goals set forth by the CDFA and the Greenhouse Gas Reduction Fund. I would be happy to provide any additional information on the inclusion of this option.

Thank you for your consideration.

Best,

Cameron Newell

Pollinator Conservation Specialist and Bee Better Certified Program Coordinator

--

Cameron Newell

Pollinator Conservation Specialist and Bee Better Certified Program Coordinator

Xerces Society for Invertebrate Conservation

619 495-3253



beebettercertified.org | [Blog](#) | [Twitter](#) | [Instagram](#) | [Facebook](#)

Connect with Xerces:

xerces.org | [Facebook](#) | [E-newsletter](#) | [Twitter](#) | [Instagram](#) | [Donate](#)

The Xerces Society is an international nonprofit organization that protects wildlife through the conservation of invertebrates and their habitat. To join the Society, make a contribution, or read about our work, please visit www.xerces.org.



CCOF

Advancing organic agriculture through certification, education, advocacy, and promotion.

Office of Environmental Farming and Innovation
California Department of Food and Agriculture
1220 N Street
Sacramento, CA 95814

August 28, 2020

Re: Organic Transition Option for the Healthy Soils Program

Dear Members of the Environmental Farming Act Science Advisory Panel and OEFI Staff:

Thank you for this opportunity to offer comment on the panel's ongoing consideration of adding an Organic Transition Option to the Healthy Soils Program. California Certified Organic Farmers (CCOF) is a nonprofit organization that advances organic agriculture for a healthy world through organic certification, education, advocacy, and promotion.

CCOF and the 56 undersigned businesses and organizations continue to advocate that an Organic Transition Option be included in the Healthy Soils Incentives Program.

This letter shows how the Organic Transition Option is a good match for the Healthy Soils Incentives Program and addresses concerns raised by the panel during their July 16, 2020 meeting.

The Healthy Soils Program Should Incentivize Organic Farming and Ranching

We know that organic farming improves soil health and sequesters carbon. Organic farming should be an important element of any strategy to mitigate climate change. Organic farming meets the goals of CDFA and the Greenhouse Gas Reduction Fund (GGRF) to "achieve feasible and cost-effective GHG emission reductions."¹ Scientific studies, including those conducted by

¹ California Air Resources Board. (2019). Cap-and-Trade Auction Proceeds Third Investment Plan: Fiscal Years 2019-20 through 2021-22. Retrieved from https://ww3.arb.ca.gov/cc/capandtrade/auctionproceeds/2019_thirdinvestmentplan_final_021519.pdf?_ga=2.44130916.1147759135.1574730304-744090955.1563814456

CCOF Comment on Healthy Soils Organic Transition Option

UC Davis researchers, consistently find that organic farming builds soil organic matter²--which stores carbon in the soil--and has lower net GHG emissions.³

Increasingly, organic farming is receiving recognition as an important strategy in preparing agriculture for climate change. The National Sustainable Agriculture Coalition (NSAC) recently published a report calling for the U.S. Department of Agriculture to “*Promote organic agriculture to make agriculture more resilient in the face of climate change while reducing GHG emissions from the agriculture production sector.*”⁴

The Organic Transition Option Will Support Long-Term Adoption of Healthy Soils Practices

Providing support for a grower to develop an Organic System Plan while implementing Healthy Soils-funded practices will make it more likely that the grower will continue using healthy soils practices after the term of the Healthy Soils grant because certified organic producers are required by federal law to use practices--including crop rotation, cover crops, and the application of plant and animal materials--that maintain or improve soil organic matter content and the overall physical, chemical, and biological condition of soil.⁵ In addition they specifically are required to utilize crop rotation to maintain or improve soil organic matter content.⁶ Assisting producers transition to organic certification will ensure they continue to use practices that keep soil healthy.

Additionally, the organic premium they receive once certified will help offset ongoing costs of implementing the healthy soils practices.

The Organic Transition Option Is A Good Match for the Healthy Soils Incentives Program

An Organic Transition Option aligns with the Healthy Soils Program’s mission of improving soil health, sequestering carbon, and reducing greenhouse gas emissions. CCOF recommends the

² Greater carbon storage in organically managed plots has been found in numerous published studies including reports on UC Davis trials, USDA Agricultural Research Service studies in Salinas, a national soil survey, and an international meta-analysis of soil quality data. See Wolf, K., Herrera, I., Tomich, T.P., & Scow, K. (2017). Long-term agricultural experiments inform the development of climate-smart agricultural practices. *California Agriculture*, 71, 120-124; Brennan, E.B., & Acosta Martinez, V. (2017); Cover cropping frequency is the main driver of soil microbial changes during six years of organic vegetable production. *Soil Biology and Biochemistry*, 109, 188-204; Ghabbour, E.A., Davies, G., Misiewicz, T., Alami, R.A., Askounis, E.M., Cuzzo, N.P., . . . Shade, J. (2017). Chapter one - national comparison of the total and sequestered organic matter contents of conventional and organic farm soil. *Advances in Agronomy*, 146, 1-35; Sanders, J. & Hess, J. (Eds), 2019. *Leistungen des ökologischen Landbaus für Umwelt und Gesellschaft*. Braunschweig: Johann Heinrich von Thünen-Institut, 364 p, Thünen Report 65.

³ De Gryze, S., Wolf, A., Kaffka, S. R., Mitchell, J., Rolston, D. E., Temple, . . . Six, J. (2010). Simulating greenhouse gas budgets of four California cropping systems under conventional and alternative management. *Ecological Applications*, 20(7), 1805-1819.

⁴ National Sustainable Agriculture Coalition. 2019. *Agriculture and Climate Change: Policy Imperatives and Opportunities to Help Producers Meet the Challenge*. Washington D.C.

⁵ Soil fertility and crop nutrient management practice standard. (2018). U.S. Government Printing Office, Electronic Code of U.S. Federal Regulations, Title 7, Subtitle B, Chapter I, Subchapter M, Organic Foods Production Act Provisions Part 205. 7 CFR §205.203. Retrieved from https://www.ecfr.gov/cgi-bin/text-idx?SID=c250fc790d44a97120c8a4935e000b15&mc=true&node=se7.3.205_1203&rgn=div8

⁶ Crop rotation practice standard. (2018). U.S. Government Printing Office, Electronic Code of U.S. Federal Regulations, Title 7, Subtitle B, Chapter I, Subchapter M, Organic Foods Production Act Provisions Part 205. 7 CFR §205.205. Retrieved from https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=fb3df1f8296f8d5599a8db-97639b6732&mc=true&n=sp7.3.205.c&r=SUBPART&ty=HTML#se7.3.205_1205

CCOF Comment on Healthy Soils Organic Transition Option

Healthy Soils Incentive Program offer a stipend directly to farmers and ranchers to develop an Organic System Plan, the detailed description of the practices and procedures used to produce organic crops and livestock that is a prerequisite for becoming certified organic. The applicant would also receive funding to implement approved Healthy Soils practices.

Providing the stipend directly to growers rather than funneling it through the Technical Assistance program will free growers to locate an advisor with specific expertise in organic crop and livestock production instead of being constrained by the advisors who have received CDFA technical assistance grants. It will also allow them sufficient time to develop the Organic System Plan over the course of the grant period instead of having to have the plan in place prior to applying for Healthy Soils funding.

Land can be certified organic after three years of transition during which no prohibited materials are applied. The three-year period of the Healthy Soils Incentive grant would coincide with the required three-year organic transition period. Pairing payment to develop an Organic System Plan with payment for conservation practices over the term of the Healthy Soils grant will offset the increased labor and management costs of organic production. With the Organic System Plan in place, the producer will be able to become certified organic immediately after the term of the Healthy Soils grant.

The Organic Transition Option Will Help Farmers and Ranchers Negotiate the Steep Learning Curve Involved with Transitioning to Organic Production

The stipend is necessary because of the time and expertise required to develop an initial Organic System Plan. In addition to learning how to maintain the detailed paperwork required for organic audits and inspections, producers new to organic may not be familiar with organically-approved materials and practices and face a steep learning curve when transitioning to the new system. Managing a farm or ranch without chemicals is a challenge and it requires intentional effort for growers to learn how to manage a new system.

One study found that the time and effort required to learn how to farm organically could be a significant barrier to more growers becoming organic and documented that growers transitioning to “reduced chemical” management invested a minimum of 2.9 hours per week learning the system while farmers transitioning to organic invested 5.2 hours per week.⁷ A team of UC Davis researchers postulated that the yield reduction commonly seen during the transition period may not be due to the soil’s adjustment to biological management as previously hypothesized but to the effort required for growers to master organic farming.⁸

⁷ Boerngen, M.A., & Bullock, D.S. (2004). Farmers’ time investment in human capital: A comparison between conventional and reduced-chemical growers. *Renewable Ag & Food Systems* 19(2):100-109. A summary *Calculating the Learning Curve for Farmers* is posted online at <https://aces.illinois.edu/news/calculating-learning-curve-farmers-0>

⁸ Martini, E.A., Buyer, J.S., Bryant, D.C., Hartz, T.K., & Denison, R.F. (2004). Yield increases during the organic transition: improving soil quality or increasing experience? *Field Crops Research*, 86(2-3), 255-266.

CCOF Comment on Healthy Soils Organic Transition Option

The Organic Transition Option Will Make Organic Certification Accessible to Beginning and Limited Resource Farmers and Ranchers

Transitioning to organic production is an economic challenge and a difficult task to accomplish. Offering a modest stipend along with payment for approved Healthy Soils practices will make organic certification more accessible to limited resource, beginning, and socially disadvantaged farmers and ranchers who otherwise might find the three-year transition economically infeasible. The Organic Transition Option would offset financial and technical barriers to transition.

Accountability Measures Can Be Readily Built into the Program

The Healthy Soils Organic Transition Option is patterned after the EQIP Organic Initiative offered by NRCS. NRCS utilizes a form, the EQIP Organic Initiative Self-Certification Worksheet,⁹ that could readily be modified for purposes of the Healthy Soils Program. The Healthy Soils grant recipient would self-certify that they will follow the federal organic standards during the term of the grant, that they will use the stipend to develop an Organic System Plan, and will apply to an accredited certification agency to become certified organic after the three-year transition is complete.

The Stipend Amount May Be Adjusted

The panel briefly discussed the possibility of lowering the stipend amount. CCOF based the suggested \$4,300¹⁰ for a producer to hire an organic crop consultant to help them complete an Organic System Plan on the amount that NRCS offers through its Environmental Quality Incentives Program (EQIP) Organic Initiative, which provides funding for producers to hire a consultant to develop a conservation plan and an Organic System Plan for the farm. Because CCOF's proposal is to offer a stipend to develop an Organic System Plan only, it would be fair to reduce the stipend amount by no more than 50%.

An Organic Transition Option Benefits Disadvantaged Communities

An Organic Transition Option would help the Healthy Soils Program meet GGRF requirements to benefit disadvantaged communities by reducing exposure to synthetic herbicides, insecticides, and fungicides in communities already disproportionately burdened by multiple sources of pollution.

An Organic Transition Option Maximizes Economic, Environmental, and Public Health Co-Benefits

An Organic Transition Option would meet the goal of CDFA and the GGRF to provide co-benefits because organic agriculture benefits the economy, environment, and public health. Organic agriculture improves soil water holding capacity, improves soil structure, reduces pollution from soil erosion and nutrient leaching, creates jobs, and improves environmental

⁹ <https://sustainableagriculture.net/wp-content/uploads/2011/11/FY-2012-Attachment-A-Self-Cert.pdf>

¹⁰ See EQIP Payment Schedule at <https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/programs/financial/?cid=nrcseprd1328227> and scroll to p. 5, Component: HU-Conservation Plan Supporting Organic Transition CAP Crops or Livestock, \$4,368.38.

CCOF Comment on Healthy Soils Organic Transition Option

health. (Refer to CCOF's [*Roadmap to an Organic California: Benefits Report*](#) for detailed citations.)

Thank you for your consideration,



Jane Sooby
Senior Outreach and Policy Specialist

Additional Signatories

- | | |
|--|---|
| 1. Anne Jacopetti, Steering Committee member, 350 Sonoma | 14. Lupe Martinez, Assistant Director, Center on Race, Poverty & the Environment |
| 2. Andy Naja-Riese, Chief Executive Officer, Agricultural Institute of Marin | 15. Kevin Hamilton, Executive Director, Central California Asthma Collaborative |
| 3. Patricia Carrillo, Executive Director, Agriculture & Land-Based Training Association (ALBA) | 16. Nayamin Martinez, MPH, Director, Central California Environmental Justice Network |
| 4. Fernando Serrano, Director, Alianza Ecologista del Condado de Tulare | 17. Cathryn Couch, Founder and CEO, Ceres Community Project |
| 5. David F. Gassman, co-convenor, Bay Area--System Change Not Climate Change | 18. Matthew Dillon, Vice President Government Relations & Social Impact, Clif Bar & Company |
| 6. Thea Maria Carlson, Executive Director, Biodynamic Association | 19. Felipe Aguirre, Coordinator, Comite Pro Uno Maywood Ca. |
| 7. Brian Shobe, Associate Policy Director, California Climate & Agriculture Network (CalCAN) | 20. David Runsten, Policy Director, Community Alliance with Family Farmers (CAFF) |
| 8. Jane Williams, Executive Director, California Communities Against Toxics | 21. Amanda Hixson, Food Program Director, Del Norte and Tribal Lands Community Food Council |
| 9. Reggie Knox, Executive Director, California FarmLink | 22. Camila Chávez, Executive Director, Dolores Huerta Foundation |
| 10. Sarah Aird & Jane Sellen, Co-Directors, Californians for Pesticide Reform | 23. Andy Fisher, Executive Director, Ecological Farming Assoc. |
| 11. Caroline Cox, Senior Scientist, Center for Environmental Health | 24. Esperanza Vielma, Executive Director, Environmental Justice Coalition for Water |
| 12. Dr. Ann Lopez, Executive Director, Center for Farmworker Families | 25. Bill Allayaud, California Director of Governmental Affairs, Environmental Working Group |
| 13. Rebecca Spector, West Coast Director, Center for Food Safety | |

CCOF Comment on Healthy Soils Organic Transition Option

26. Lendri Purcell, Co-Founding Board President, Families Advocating for Chemical and Toxics Safety (FACTS)
27. Lisa Archer, Food and Agriculture Program Director, Friends of the Earth U.S.
28. Anet Aguilar, Latinx Outreach, GMO Free California
29. Bradley Angel, Executive Director, Greenaction for Health and Environmental Justice
30. Lucia Sayre, Director of Regional Innovation and Community Resilience, Healthy Food in Health Care program, Health Care Without Harm
31. Kimberly Baker, Executive Director, Klamath Forest Alliance
32. Ronnell Hampton, MAUS, Policy Manager, Los Angeles Food Policy Council
33. Rika Gopinath, Co-chair, Moms Advocating Sustainability
34. Lynne Baker, member, Steering Committee, Napa Climate Now/350 Bay Area
35. Rex Dufour, Western Regional Office Director, National Center for Appropriate Technology (NCAT)
36. Roosevelt Tarlesson, Executive Director, National Economic and Social Development Action Committee
37. Lena Brook, Director, Food Campaigns, NRDC
38. Dave Henson, Executive Director, Occidental Arts and Ecology Center
39. Brise Tencer, Executive Director, Organic Farming Research Foundation
40. Margaret Reeves, Senior Scientist, Pesticide Action Network—North America (PANNA)
41. Harry Wang, MD, President, Physicians for Social Responsibility/Sacramento
42. Padi Selwyn, Co-chair, Preserve Rural Sonoma County
43. Michael Reid Dimock, Director, Roots of Change
44. Robert M. Gould, M.D., President, San Francisco Bay Physicians for Social Responsibility
45. Miriam Limov, Farm Institute Associate, Sierra Harvest
46. Keith Schildt, Chair, Legislative Policy Committee, Slow Food CA
47. Nichole Warwick, Co-Founder and Co-Director, Sonoma Safe Agriculture Safe Schools (SASS)
48. Janet S Johnson, Coordinator, Sunflower Alliance
49. Elena Karoulina, Executive Director, Sustainable Solano
50. Katie Huggins, Vice President Technical Services, Traditional Medicinals
51. Bianca G. Lopez, Co-Founder/Project Director, Valley Improvement Projects
52. Adam Vega, Community Organizer, Ventura County Coalition Advocating for Pesticide Safety (VC-CAPS)
53. Janice Schroeder, Core Member, West Berkeley Alliance for Clean Air and Safe Jobs
54. Jo Ann Baumgartner, Executive Director, Wild Farm Alliance
55. Janus Holt Matthes, Board Member, Wine & Water Watch (Sonoma County Tomorrow affiliate)
56. Jora Trang, Chief of Staff and Equity, Worksafe

-----Original Message-----

From: wendy Krupnick <wlk@sonic.net>
Sent: Saturday, August 29, 2020 9:05 PM
To: CDFA OEFI@CDFA <CDFA.OEFI@cdfa.ca.gov>
Subject: Healthy Soils Organic Transition

CAUTION : [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.

To whom it may concern,

As an organic farmer and educator for 46 years, I urge you to adopt the Organic Transition Option for the Healthy Soils Program.

The proven benefits of organic farming and "carbon farming" practices have become more evident, so more and more farmers and ranchers are interested in adopting these practices. State support for these farmers and practices will be a win-win-win for the producers, environments and people of the state and beyond.

Organic farming captures carbon helping to mitigate climate change as well as the impacts of the weather extremes we are experiencing. Yet changing growing practices is always challenging for producers so some support from the State will go a long way towards helping with this transition.

Of course, there are many other reasons why more organic farming will benefit the state. Reduced exposure to pesticides by farm workers, in farming communities and to water and wildlife is critical. And the demand for organic food in the US exceeds supply; the more food consumed in the US that is grown in the US the better for our economy and food security.

Please approve this program and continue the maximum funding for the Healthy Soils Program.

Sincerely yours,

Wendy Krupnick

Santa Rosa, CA



CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

1127-11TH STREET, SUITE 626, SACRAMENTO, CA 95814 • PHONE (916) 446-4647

August 31, 2020

Dr. Jeff Dlott
Environmental Farming Act Science Advisory Panel
California Department of Food and Agriculture
1220 N Street
Sacramento, CA 95814

RE: Organic Transition Plan to the Healthy Soils Program

Dear Chair Dlott:

Thank you for the opportunity to provide comment on the proposal forwarded by the California Certified Organic Farmers (CCOF) to add a transition to organic option in the California Department of Food and Agriculture's Healthy Soils Program (Program).

The California Farm Bureau Federation (Farm Bureau) is a farmer-led organization, representing more than 30,000 farmers and ranchers, organic and conventional. We strive to protect and improve the ability of farmers and ranchers to provide a reliable supply of food and fiber through stewardship of California's resources. As you review this proposal, Farm Bureau asks that you bear in mind that it does not meet the standards required for all other approved practices, would not provide additional funding to farmers but rather to for-profit consultants, and sets a precedent which will lead to a dramatic shift of the guiding principles and objectives of the Program.

Planning Does Not Build Soil Organic Matter

To preface this objection, Farm Bureau supports organic production (a large portion of our members are certified organic producers), and we do not rebut that organic practices build soil organic matter. We do, however, object to this proposal as it merely subsidizes the development of a plan rather than actual practices that build soil health, sequester carbon, and/or reduce greenhouse gas emissions (GHGs). Planning alone, as this proposal seeks to fund, does not have a demonstrable nexus to those discrete, purposeful objectives of the Program. Moreover, there are already existing assistance programs available for this aim, including public funds by USDA-FSA, and private funds, such as CCOF's Organic Transition Grants. Scaling up these programs and others within the State Organic Program should be explored rather than modifying the Healthy Soils Program.

While developing an organic systems plan will help growers who are *considering* transitioning to organic, it is only the first of many, more expensive hurdles of the certification process which can take years to complete, if at all. Farmers weigh many factors as they choose to transition their acres—these include things like the commodity market, access to natural resources, land use patterns, employment costs. Unfortunately, these often lead a grower to not transition to organic, even after a plan has been

developed. In this circumstance, there would be no soil benefit derived and constitute a waste of limited funding that should be available to farms with approved projects. The same could be said if a grower does transition to organic and then later transitions out, as is a customary practice in agriculture. The Department has no authority to “claw-back” grant funds and redistribute them. As Farm Bureau and other groups advocate for Program funding within the Legislature and the Administration, having hard data demonstrating every state dollar of investment yields a definitive climate benefit is paramount. Without this information, the Program’s efficacy will be questioned. Given the currently oversubscribed nature of the Program, foregoing funding for shovel-ready projects that will have an effect *today* to pay for planning that *may* lead to practices in the future is unwise.

Funding Will Not Be Directed to Farmers or Directly Benefit Farmers

The Healthy Soils Program is one of the only State funding programs that is directly for California farmers and ranchers. At a time when regulatory obligations on farming communities have risen and the COVID-19 pandemic has dramatically driven profits down, it’s important that this underserved community continues to have access to funds to make on-farm improvements and be resilient to climate change. Since the Program’s inception, funds that were supposed to be secured directly for farmers have been chipped away in many forms—directed for technical assistance, demonstration projects, etc. This proposal would continue that legacy and directly fund for-profit consultants or advisors who would be paid to render this planning service, rather than to growers to cover the cost to implement practices. If the goal of the Program is to “provide financial assistance for implementation of conservation management,” as stated, it should rather than be used to feather the nest of others, as proposed.

Proposal is the Proverbial Camel’s Nose Under the Tent

The Healthy Soils Program has seen dramatic changes in recent years—approving new practices, adapting to changing standards, and managing the inconsistency of State funding. Through that evolution, the Department and the Panel have used GHG emission reductions and soil organic matter as the guideposts to direct the Program’s path forward. Using funds to pay for planning protocols is not continuing within those guideposts, but rather is a significant deviation of the Program’s path. If this proposal is approved, it will invite all other planning entities to seek funding through the Program, even if they cannot demonstrate a direct GHG emission reduction or increase soil organic matter. These types of plans could include but aren’t limited to--biodiversity plans, carbon farming plans, regenerative agriculture plans, farm succession plans, nutrient management plans. While it is disappointing, the Program’s funding is finite. Every dollar offered to market planning protocols is one less dollar available to do actual healthy soils practices on farm.

A Viable Alternative: Create a Climate Smart Farm Planning Program

This transition to organic proposal does not fit within the existing structure of the Program—it is not an on-farm incentive to implement practices and does not meet the standards of technical assistance. Rather than try to force a square peg in a round hole, Farm Bureau suggests the Department and Panel consider creating a Climate Smart Farm Planning Program. Through deliberation, the Department with guidance by the Panel, could establish a framework where all planning protocols, currently available and yet to emerge, could be developed and offered to farmers to meet the challenge of climate change. Within this framework, the Panel and Department could determine new objectives, standards and practices, as necessary. This new program could include several farm planning practices that have not been readily acceptable in the Healthy Soils Program but would be helpful to manage climate impacts—this could

include things like resource forecasting, crop selection, income diversification, or emergency management for more frequent bouts of wildfire, flooding or drought. Within this framework, the transition to organic planning protocol would be better suited.

We appreciate the opportunity to share our concerns and suggest a viable alternative that does not undermine the existing Healthy Soils Program. If you have any questions or concerns please feel free to reach out to Farm Bureau staff, Taylor Roschen, at troschen@cfbf.com or 916-446-4647.

Thank you,

A handwritten signature in dark ink, appearing to read 'T. Roschen', with a stylized flourish at the end.

Taylor Roschen, Policy Advocate
California Farm Bureau Federation

cc: Members of the Scientific Advisory Panel
Karen Ross, Secretary, California Department of Food and Agriculture
Jenny Lester-Moffit, Undersecretary, California Department of Food and Agriculture
Dr. Amrith Gunasekara, Scientific Advisor, California Department of Food and Agriculture