

CDFA Healthy Soils Program (HSP) New Management Practices Proposals CDFA Responses to Public Comments

Proposals to suggest new management practices for potential inclusion under the HSP were accepted between June 29, 2020 and August 28, 2020.

Submitted proposals were reviewed by a technical sub-committee of subject matter experts from California universities and USDA NRCS.

Recommendations developed by CDFa staff as a result of the review process were available for public comment between July 28, 2021 and August 27, 2021.

This document summarizes the comments received and CDFa responses.

	Submitter	Comment Summary	CDFa Response
1	Berkeley Economic Advising and Research, LLC	CDFa should work with CARB to expand the use of carbon credits for innovations in bioenergy (including local biofuel production, green electricity and biochar production) within California.	The expansion of carbon credits is beyond the scope of the CDFa HSP. CDFa will share this comment letter with CARB.
2	Caribou Biofuels	CDFa should work with CARB to develop a certification program that grades biochar for sequestration potential, rewarding innovation for sustained food security, habitat, and lasting, nature-based climate solutions.	Certification of biochar is beyond the scope of the CDFa HSP. Biochar application can currently not be incentivized under the HSP Incentives Program due to lack of published data to inform development of eligible application rates and GHG reduction quantification. Biochar application will be considered eligible for funding under the HSP Demonstration Projects (Type A).
3	California Walnut Commission (CWC)	The CWC would like to see an enhanced focus on the potential of whole orchard recycling (WOR) through research funding, while also providing growers funding to offset the costs associated with it.	WOR is already eligible for funding through both the HSP Incentives Program and HSP Demonstration Projects.
4	Ecosystems Northwest	Comments expressed support for encouraging and investigating organic matter addition in soils; with the possibility that food waste hydrolysates may not generate as long lasting carbon storage in soil as compost and biochar.	Thank you for the comment of support.

5	LA Plant Genetics	<p>Suggest including funding for soil free organic carbon synthesis in the HSP. The method involves artificial soil synthesis using a variety of urban waste materials to quickly generate a synthetic soil like material that can be used for crop production and carbon sequestration. As this is a soil free method for production of soil organic carbon, it may not fit in the current scope of the HSP. Maybe it can be included as a novel method for production of healthy soil.</p>	<p>Soil-free systems are beyond the scope of the HSP. The proposal for evaluation of this practice was not included in the original solicitation in 2020 and was not evaluated by the technical sub-committee; therefore, the practice may not be evaluated for potential inclusion at this time.</p>
6	Xerces Society for Invertebrate Conservation	<p>CDFA should include Riparian Herbaceous Cover and Conservation Cover practices for Grazing Lands.</p> <p>CDFA should consider Vegetative Drift Barrier and Upland Wildlife Habitat Management for Pollinators practices under the HSP.</p>	<p>Quantification for estimated GHG reductions for Riparian Herbaceous Cover and Conservation Cover are currently only available for Cropland systems. GHG reduction estimation for Upland Wildlife Habitat Management for Pollinators practice is currently not available through the USDA-NRCS COMET-Planner Tool.</p> <p>CDFA will consider inclusion of these practices in future rounds and will work with USDA-NRCS and CARB to evaluate GHG reduction quantification methodologies for these practices.</p> <p>The proposal for evaluation of Vegetative Drift Barrier practice was not included in the original solicitation in 2020 and was not evaluated by the technical sub-committee; therefore, the practice may not be evaluated for potential inclusion at this time.</p>