



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

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Dear OEFI Staff,

Thank you for continuing to gather input into the Healthy Soils Program. It is a flagship program not only for the CDFA but for the state, and we welcome its expansion.

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 is joined by the undersigned businesses and organizations in supporting the expansion of the Healthy Soils Program to include the transition to organic farming.

Our goal is to further address climate change by scaling up the Healthy Soils Program and the adoption of conservation practices throughout the state. Including an organic transition package within the Healthy Soils Program aligns with the program's mission of improving soil health, sequestering carbon, and reducing greenhouse gas emissions. Studies across the United States demonstrate that organic farms are high in soil organic matter and that organic practices sequester carbon.

We recommend CDFA add an organic transition package to the Healthy Soils program that is modeled on NRCS's National Organic Initiative funded through EQIP, the Environmental Quality Incentives Program.

The National Organic Initiative offers funding to certified organic, exempt organic, and transitioning to organic operations to develop a conservation plan and implement approved conservation practices, many of which are approved practices for the Healthy Soil program. Certified organic operations must retain their certification during the three-year grant period, and exempt and transitioning operations must "agree to develop and work towards implementing an Organic System Plan (OSP) to meet National Organic Program organic certification through USDA."

We propose using the National Organic Initiative model to support farms transitioning to organic under the Healthy Soils Program. We envision Healthy Soils funding an organic transition package that pairs the existing incentives for eligible Healthy Soils practices with an

incentive to develop an OSP that would make the producer eligible for organic certification after the three years of transition.

One of the biggest obstacles for producers interested in becoming certified organic is the required three-year transition, during which time producers take on the increased costs of organic management yet are unable to access the organic premium offered to certified organic producers.

Offering an organic transition support package – pairing incentives for Healthy Soils practices with an incentive that will offset the costs of developing an OSP and making the organic transition – through Healthy Soils will attract farmers and ranchers who have considered going organic but found the transition too economically daunting. This support package will enable such farmers and ranchers to learn how to farm using organic, healthy soils practices with less financial risk and to maintain organic records during the term of their three-year Healthy Soils grant.

In addition to existing conventional growers, a transition to organic package could make organic certification more accessible to limited resource, beginning, and historically underserved farmers and ranchers.

Certified organic producers are required by federal law to maintain or improve their soil organic matter and must use crop rotation, so assisting producers in transitioning to certified organic will ensure they continue to use (and earn an organic premium to help offset the cost of) healthy soils practices.

Research trials at UC Davis and elsewhere demonstrate a characteristic of organically-managed soils: they build more soil organic matter, even with routine tillage, than conventionally managed ground. For example, data from UC Davis's Long-Term Research on Agricultural Systems study showed that after 13 years, organic plots under standard tillage sequestered 14 times more carbon than conventionally managed plots; under conservation tillage, organic plots sequestered 27 times more carbon than conventional.¹ Moreover, a six-year study on organic vegetable production in California's Salinas Valley found that despite intensive tillage, annual cover cropping and compost applications increased both soil carbon and microbial populations.²

¹ 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.

² 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.

Soil organic matter is a measure of sequestered carbon and is a hallmark of organic farms and ranches. Thus, supporting producers in transition to organic production is well worth Healthy Soils investment.

CCOF welcomes the opportunity to partner with CDFA to spread the word about Healthy Soils and encourage CCOF's 2,300 certified organic farmers and ranchers in California to consider applying for Healthy Soils grants. Organic producers are very interested in the Healthy Soils program and we want to encourage their participation.

We invite you to follow up with any questions you have and look forward to discussing our idea with CDFA in greater depth soon.

Thank you for your consideration,

Jane Sooby
Senior Outreach and Policy Specialist
CCOF

Additional signatories:

Matthew Dillon
Senior Director of Agriculture
Clif Bar & Company

Jeremy Johnson
Senior Counsel
Traditional Medicinals

Jo Ann Baumgartner
Executive Director
Wild Farm Alliance

Rex Dufour
Western Regional Office Director
National Center for Appropriate Technology
(NCAT)

Janet E. Derecho
Executive Director
Ecological Farming Association

Patricia Carrillo
Executive Director
Agriculture and Land-Based Training
Association ALBA

Margaret Reeves
Senior Scientist
Pesticide Action Network—North America

Sarah Aird
Co-Director
Californians for Pesticide Reform

Dave Runsten
Policy Director
Community Alliance with Family Farmers