



April 25th, 2024

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

President Don Cameron
California State Board of Food and Agriculture
1220 N Street
Sacramento, California, 95814

RE: Guiding Principles - Defining Regenerative Agriculture for California State Policies and Programs

Dear Secretary Ross, President Cameron, Members of the California State Board of Food and Agriculture, Members of the Regenerative Agriculture Work Group, and Members of the Environmental Farming Act Science Advisory Panel,

The Office of Kat Taylor, TomKat Ranch LLC, and the organizations listed, are writing to respectfully provide our recommendations to the California Department of Food and Agriculture (CDFA), to help inform the agency's effort to coalesce stakeholders around a shared definition of "regenerative agriculture," including principles and outcomes, to guide and realize its full promise for state policies and programs. As we understand, this process will culminate in June of 2024, with the final definition being added to the California Food and Agricultural Code, providing a statutory reference point for California's policies and programs going forward.

The undersigned wish to acknowledge the breadth and thoroughness of CDFA's public comment process and the work of the Science Advisory Panel to provide a sound framework that has already created some consensus. We believe this framework, combined with a robust public feedback process, can form a holistic and relevant North Star for California's efforts. We applaud CDFA's endeavors to seek and incorporate direct feedback from agricultural stakeholders and other members of the public.

Regenerative Agriculture is gaining traction globally as countries seek solutions to issues like climate change, biodiversity loss, and ongoing nutrition insecurity. Across the globe, corporations and businesses with combined annual revenues of over \$1 trillion are actively [using](#) the term. Although the words "regenerative agriculture" are widely used, including in pieces of California legislation that recognize its promise and seek to scale its benefits, it does not have a uniform meaning. The concept of regenerative agriculture is already highly familiar to ecosystem stewards in California, many of our farmers and ranchers, and harkens back to long-standing indigenous peoples and their traditional agricultural methods from which the concept grew.

We believe that the state's programmatic understanding must include an acknowledgment of the indigenous origins and tradition of regenerative agriculture, as well as origins and preservation by non-indigenous communities of color in North America.

We concur with CDFA that a shared understanding of what Regenerative Agriculture means, coupled with technical assistance and appropriate economic incentives can inspire California producers toward changes that provide more stability and better livelihoods, and ultimately create an agricultural system that enables everyone along the supply chain to prosper. As California will be the first state in the nation to create such a shared commitment to regenerative agriculture, there is no doubt that other states, the federal government, and countries are watching us very closely.

With adequate financial and technical support for producers, implementing regenerative agriculture at scale in California can solve many crises our state faces because regenerative agriculture provides a broad set of co-benefits. Those co-benefits include improving soil health, restoring biodiversity above and below ground, re-sequestering atmospheric carbon, ensuring long-term land productivity, increasing water retention and holding capacity, mitigating wildfires and floods, supporting rural community economics, and improving human and animal welfare.

There is no step-by-step process for creating a regenerative system on a piece of land, but there are fundamental principles that underlie achieving regenerative systems. In public stakeholder meetings, several groups have referenced primary principles that constitute a basis for site-specific regenerative agriculture. The undersigned are offering six fundamental principles that we believe align with other verbal and written comments provided by groups, and reflect the [Noble Research Institute's](#) regenerative principles. These are:

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|--------------------------|-------------------------|
| 1. Know Your Context | 4. Support Biodiversity |
| 2. Manage Disturbance | 5. Keep Soil Covered |
| 3. Maintain Living Roots | 6. Integrate Animals |

California is agriculturally unique and geographically one of the most diverse states in the country, growing over 400 different specialty crops and housing over 70,000 farms and ranches. With state-specific contexts and the breadth of

California's agricultural diversity in mind, **we recommend that CDFA's efforts define regenerative agriculture in the following ways:**

- Recognize Traditional Ecological Knowledge (TEK) and ways of living and understanding natural systems,
- Acknowledge that regenerative is a journey of holistic farming, ranching, and land management systems, with multiple pathways for achievement tailored to individual operational contexts,
- Focus on improving soil health and increasing biodiversity and quality nutritious food as its core principles and goals,
- Incorporate measures to promote equity and inclusion, particularly for socially disadvantaged ethnic groups involved in California agriculture,
- Adapt practices to accommodate the ecological, geographical, and historical condition of a place (context), and acknowledge the variability of effectiveness of these practices across different environments,
- Avoid overly restrictive or prescriptive definitions that discourage on-farm innovations, a historical hallmark of California agriculture,
- Avoid references to third-party certifications,
- Guard against degenerative agricultural practices that do not advance the intentions and goals of the state's programmatic definition and the regenerative movement as a whole,
- Commit to reducing and then eliminating chemical inputs over time, such as synthetic herbicides and pesticides,
- Support ecological outcomes verification of progress that are rigorous but not economically burdensome for producers,
- Incentivize consistent long-term management that's needed to truly realize the benefits of land regeneration, increased biodiversity, and resilience to extreme weather such as droughts and wildfires,
- Recognize farmworker well-being as an important human outcome, acknowledging their frontline role in agricultural operations, and
- Keep in mind that the costs for transitioning to regenerative agriculture may be substantial, and may require financial incentives and technical assistance that de-risk the transition for producers, especially those who are smaller-scale, under-resourced, or socially disadvantaged.

In regenerative agriculture, specific practices and approaches of land stewardship may vary between farmers and ranchers. While farmers emphasize techniques like cover cropping and reduced tillage, ranchers prioritize grazing management and biodiversity preservation. Despite this difference between farming and ranching practices, it's important to acknowledge that the core principles of regenerative agriculture—such as improving soil health, enhancing biodiversity, and promoting ecosystem resilience—are shared among both groups.

Being such a diverse state, our definition should be flexible and adaptable across many varieties of systems and contexts. A successful regenerative farming system hinges on the producer's intimate understanding of, and connection to, the land on which they work.

As the process of defining regenerative agriculture continues, we are committed to remaining actively engaged. We suggest that the best approaches to defining and encouraging the meaningful adoption of contextual regenerative management includes investments in the land stewards who ground their operations in regenerative principles.

Thank you for the opportunity to reinforce a universally inclusive and accessible framework for regenerative agriculture for our state. It is critical to cultivating the broadest set of adopters and scaling regenerative land management in alignment with California's 30x30 land management goals.

Sincerely,

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