

**CDFA Healthy Soils Program
Public Comments and Responses
Comment Period: December 17, 2019 - January 7, 2020**

Category	Comment	Response
Application	Allow viewing of submitted applications and/or enable export of the submitted application.	The HSP online application platform will allow applicants to view their submitted applications. Since applications are reviewed first-come-first-serve in the rolling process, applicants will not be able to recall and re-submit the same application.
	For questions where the applicant must choose between two options by clicking to fill in a bubble, enable unchecking of the bubble or add a third option such as "N/A". If applicant selects a box but decided to leave the question unanswered, they are not able to unselect the box.	The functionality to leave any of the optional questions unanswered will be provided.
	Allow additional contact information for alternate contacts.	CDFA can provide additional fields for alternate contacts.
	Streamline the application and review process for making Priority Populations eligibility determinations.	CDFA is working with CARB to evaluate these questions and would be able to propose improvements in future rounds of the HSP. In the current round, the CDFA HSP Re-Plan Tool will assist applicants determine if they are located in communities associated with Priority Populations.
	Support automated budget calculations.	Thank you for the comment of support.
	The questions included to determine whether an application will benefit priority populations are extensive and likely to lead to applicants self-selecting against identifying projects that may benefit priority populations.	CDFA is working with CARB to evaluate these questions and would be able to propose improvements in future rounds of the HSP.
	It appears unnecessary to request applicants look up and report their Assembly Member and Senator.	This information is reported by CDFA to CARB and the Legislature. Technical Assistance Providers would be able to assist applicants determine this information. Website links where this information can be found will be included in the HSP electronic application.
CCI Reporting	Many growers have cited CDFA's requirement to contact a subset of awarded projects to collect data including, but not limited to, eligible agricultural management practice implementation and GHG reduction estimates, for three years after project completion, as a main deterrent for participating in HSP. Once the grant term has ended, CDFA does not have a right to collect data on people's farms. We understand the need to collect data, particularly carbon data, in the long term, but this seems like it would be a more appropriate action with the HSP Demo Type A projects which are focused on data collection. In any case, the additional follow up to collect data and project related documentation after the grant period should be strictly voluntary given it is outside of the grant agreement period.	This requirement is based on the CARB Outcome Data Reporting requirements consistent with CARB Funding Guidelines. Not all projects are subject to this requirement, but a subset may be selected randomly. Post-project outcome reporting is a critical component of the CCI to demonstrate long-term benefits and can impact future funding made available to any of the CCI-funded programs. This requirement is included in the HSP grant agreement for awarded projects.
Clarification of RGA Language	Page 4, edit sentence to "a previously implemented practice cannot be implemented on the same field"	Language has been revised to clarify that while previously funded APN or field may be funded, the practice proposed on that field must be a new one; previously existing practices/ongoing or continuing practices are not eligible for HSP funding.
	It should be more clear that applicants are allowed to implement practices that overlap according to these categories, but if they do, only one will be funded. only non-overlapping practices Adding a reminder such as this will be helpful to ensure applicants aren't surprised if they are denied funding for overlapping practices.	CDFA HSP Re-Plan tool does not allow applicants to overlap certain practices on the same field. The functionality of this tool is designed to help applicants select the practice of choice among the non-overlapping group upfront at the application stage. This function will also help minimize errors where applications are determined as disqualified for not meeting program requirements.
	The question in detailed scoring criteria, "Proposed practice not implemented in the field currently or last year?" seems to contradict the requirement on page 4 that "A previously implemented practice cannot be implemented on the same field or APN".	Language has been revised to clarify that while previously funded APN or field may be funded, the practice proposed on that field must be a new one; previously existing practices/ongoing or continuing practices are not eligible for HSP funding.

	Clarify in the RGA that a specific HSP practice that has been previously used or is currently part of the management for a field is not eligible for funding, but different practices can be implemented on such a field.	Language has been revised to clarify that while previously funded APN or field may be funded, the practice proposed on that field must be a new one; previously existing practices/ongoing or continuing practices are not eligible for HSP funding.
	A clear description of how projects that benefit priority populations will be selected should be added so that applicants and the general public can understand why projects may or may not receive funding through the HSP.	Priority Population benefits are assessed on the basis of responses provided by applicants to specific questions included in the application and supporting documents provided. Any projects providing these benefits will be funded on a priority basis provided they received the minimum qualifying score.
Eligible Practices	CDFA should consider a California specific standard for residue and tillage management practices (no-till and reduced-till).	CDFA is working to align with USDA NRCS and minimize duplication of existing efforts.
	Compost application rates are too low and should be more flexible. Many sustainable organic producers regularly apply 10 tons/ acre of higher N compost.	Compost Application rates are based on the White Paper which was established through a scientific-consensus based review process including public and stakeholder input. Conducting a similar process would take significant amount of time and may not allow inclusion of such changes in the immediate future rounds of the HSP.
	Demo projects should allow for the demonstration of making compost, not just applying it.	GHG reductions (or emissions) from compost production are not included in the GHG Quantification Methodology and project boundaries for the HSP. Compost production is incentivized through CalRecycle's Organics Grant Program.
	CDFA should include an Organic Transition Option in the next round of HSP.	A proposal for inclusion of this option was submitted to the CDFA Environmental Farming Act Science Advisory Panel (EFA-SAP) at its January 16, 2020 public meeting. CDFA is currently evaluating the costs and greenhouse gas reductions associated with this option and will report their findings to the EFA SAP at the next public meeting in April. Inclusion of this practice will be contingent upon EFA SAP recommendations and public and stakeholder input.
	Include food waste hydrolysates as an eligible practice under the HSP.	CDFA anticipates conducting a process for evaluation of new practices under the HSP in 2020. Proposals for practices to be evaluated should be submitted through that process for future inclusion under the HSP Incentives Program.
	The Compost White Paper lists "conservation lands" as ineligible for rangeland compost application. A good portion of rangeland in San Mateo County is owned by conservation landowners with grazing tenants. Both the tenants and landowners are interested in the rangeland compost practice. This requirement makes such lands ineligible. Furthermore, measures to prevent inappropriate application of this practice on conservation lands are already in place: CDFA recommends working with a professional to consult on the rangeland compost application; and other criteria for eligibility make sensitive habitats, like coastal prairie, ineligible for this practice.	CDFA is looking into the definition of conservation lands and hopes to address this issue in the future.
	Reduction in soil fumigants, including chloropicrin, metam sodium and metam potassium should be eligible for incentives under the HSP.	CDFA anticipates conducting a process for evaluation of new practices under the HSP in 2020. Proposals for practices to be evaluated should be submitted through that process for future inclusion under the HSP Incentives Program.
	Allow one-time compost applications on rangeland.	This practice has been funded through Demonstration Projects (Type A) and data from this project can be analyzed in the future for modeling and inclusion in COMET-Planner.
	Supports that the Demonstration Projects Request for Grant Application includes funding eligibility for the use of nitrification inhibitors, use of slow release fertilizers, and one-time compost application with higher rates for grazed grasslands.	Thank you for the comments of support.
	Allow one-time compost application on perennial crops, especially vineyards.	CDFA anticipates conducting a process for evaluation of new practices under the HSP in 2020. Proposals for practices to be evaluated should be submitted through that process for future inclusion under the HSP Incentives Program.
CDFA HSP Comet-Planner is missing the option from Reduced-till to No-till.	Eligible tillage practices only include conversion to reduced or no till from conventional tillage.	

HSP Goals	Clarify the purpose and role of soil testing in the HSP program	Soil organic matter content collected through annual soil sampling is the only scientific metric that is reported by grant recipients to CDFA. This data is important to inform future modeling work to enhance Comet-Planner.
	Biodiversity is a fundamental principle that is barely included among the practices that are rewarded in the Healthy Soils Program, i.e. whole systems enhancement and conservation of adequate numbers and diversity of species in plant communities.	Several of the HSP practices are known to enhance biodiversity related benefits, such as establishment of permanent herbaceous and woody cover practices.
HSP Goals, Eligible Practices	The significance of pesticide use reduction also cannot be overstated for carbon sequestration in that you will never experience the full potential carbon sequestration from soils exposed to toxic pesticides.	CDFA anticipates conducting a process for evaluation of new practices under the HSP in 2020. Proposals for specific practices to be evaluated should be submitted through that process for future inclusion under the HSP Incentives Program.
Payment Rates	Payment rates for compost are too low.	CDFA is evaluating how costs may be increased. The HSP only incentivizes the cost of compost. Cost of delivering of compost is not supported through the HSP because of greenhouse gas emissions associated with delivery. These greenhouse gas emissions are not included during modeling in Comet-Planner. Applicants are encouraged to utilize cost-share for delivery costs.
	Cost of implementation of HSP practices in San Mateo county is low, despite doubling of NRCS payment rates.	CDFA is evaluating how costs may be increased. Current standard payment rates are double the rates of NRCS EQIP and intended to cover 100% of the costs of implementing a practice.
	Establish a minimum annual payment for small farms (e.g. \$1,500 per year).	The proposed minimum payment rate is specific to the USDA-NRCS Conservation Stewardship Program and not EQIP. CDFA HSP is aligned with the USDA-NRCS EQIP which does not have a minimum payment requirement.
	USDA-NRCS EQIP payment rates for practices are too low. HSP payment rates should factor in increased CA minimum wages that increase labor costs.	CDFA is evaluating how costs may be increased. Current standard payment rates are double the rates of NRCS EQIP and intended to cover 100% of the costs of implementing a practice.
Program Eligibility	Include cannabis growers in the HSP Incentives Program.	The Healthy Soils Program is focused on horticultural and agricultural crops for food production.
	Allow financial incentives for elderly or disabled farmers and ranchers.	The Healthy Soils Program is open to all farmers and ranchers.
	Define "other plant growth media" to make it clear what projects can and cannot be funded under the program.	Other plant growth media may refer to but are not limited to synthetic growth media or hydroponic systems. Agricultural operations utilizing growth media in containers or otherwise not synonymous with plants being grown on soil on agricultural lands are not eligible. CDFA is able to make a determination on eligibility on a case-by-case basis in such instances.
Program Requirement	Remove the requirement for a letter of permission from the landowner for projects on rented land, for practices that are part of standard crop management.	Without Letter of Landowner Agreement, it will be difficult to gauge if the land will be available for the entirety of the grant term. An alternative document is a copy of the lease showing dates for which land has been leased; however in the past there have been concerns regarding the length and extent of leases and potentially confidential information they may contain, in the light of which CDFA had allowed a Letter of Agreement from landowner as an alternative to providing the copy of lease.
	Reduce the demonstration project farmer/rancher attendance requirement.	CDFA will continue to require 120 attendees as a requirement for the HSP Demonstration Projects. Grant recipients may meet this requirement through outreach and education efforts conducted in addition to the mandatory field days. Attendance records at mandatory and additional events to show number of farmer and rancher participants must be submitted to CDFA.
	The HSP program currently does not attempt to motivate use of practices that maximize carbon sequestration on farms by allowing multiple practices to be implemented on farms. Moreover it has failed to engage farmers at scale.	Multiple practices are allowed for implementation under the HSP. Projects implementing multiple practices make the majority of awarded proposals.

	<p>The requirement that projects proposing to implement prescribed grazing include a grazing management plan completed by a Certified Rangeland Manager is likely to limit applications from socially disadvantaged ranchers and smaller ranchers with limited resources. The costs associated with development of a grazing management plan are not insignificant</p>	<p>This requirements is based upon consultations with USDA-NRCS team since schedule, grazing areas and frequency of grazing animals on land cannot be verified in the absence of a grazing management plan.</p>
	<p>For longer-term practices (e.g., Riparian Forest Buffer) it would reduce costs for participants if they were only required to take a sample at the beginning and end of the project.</p>	<p>Cost for soil sample testing for soil organic matter content is covered by the HSP grant.</p>
Proposed Program Changes	<p>Support for:</p> <ol style="list-style-type: none"> 1. Increasing the maximum grant award from \$75,000 to \$100,000. 2. Allowing for a previously implemented practice to be implemented on a new or different field within the same (previously funded) Assessor Parcel Number (APN). 3. Incentivizing Whole Orchard Recycling (WOR) as an eligible practice under the HSP. 4. Creating opportunities for 25% of the total available funding to be awarded to Socially Disadvantaged Farmers and Ranchers, and projects that provide benefits to AB 1550 Priority Populations. 5. Reducing essay-type questions from the application. 6. Integrating the development of a map-based application input tool to reduce the number of attachments and analyses to be performed on external websites that were previously required for the HSP Incentives Program application. 7. CDFA is collaborating with USDA-NRCS and CARB to integrate Standard Payment Rates for the HSP Incentives Program in the Comet-Planner tool for the HSP, reducing the number of attachments required with the application. 8. Modifying the time frame for providing notifications and feedback to applicants to within 6 weeks, to allow award of successful applicants within the rolling application submission period. 9. Evaluating USDA-NRCS EQIP payment rates for 2020 in efforts to better align the HSP with EQIP. 10. Moving to a rolling 4-month window for applications. 11. Providing sample text in the work plan template. 	<p>Thank you for the comments of support.</p>
Resources	<p>Provide more information on expectations and best practices for taking soil samples for HSP projects with multiple practices on different sub-sections of a parcel.</p>	<p>Guidance for soil sampling and testing is available under 'Resources' on the HSP website https://www.cdfa.ca.gov/oefi/healthsoils/IncentivesProgram.html.</p>
Timeline	<p>Short submission timeline forces producers to choose between their business operations and hasty submission of this funding, therefore, directly limiting the number of applications submitted in this round.</p> <p>Concerned that the rolling application period will create unnecessary stress for the applicants and for the technical assistance providers helping with applications. Better to have a guaranteed application period, that could be extended if funds still exist. In case of a high demand of applicants requesting help from our RCD, we can work within a fixed timeframe.</p>	<p>CDFA has implemented a 4-month rolling application period for HSP Incentives Program. Applications will begin to undergo evaluation and review process upon submission in the order they are received, and must receive a minimum score to be considered for funding.</p> <p>The guaranteed application period, if provided, will need to be short, i.e. no more than 6 weeks to allow time for processing of grant agreements and full project implementation (3 years of practices).</p>
Whole Orchard Recycling	<p>"WOR can be repeated no more than once every ten years for an APN or field." - This statement is unclear if it refers to ten years before or after implementation.</p>	<p>This statement will be modified to clarify that the age of trees being chipped for WOR must be at least 10 years of age. This would ensure the minimum biomass needed to sequester soil carbon.</p>