

Comments Received on the CDFA Healthy Soils Program Public Listening Sessions
Comment Period: September 23 - October 23, 2019

Category	Comment/Question	Response
Project Site	Allow previously funded APNs to apply for new practices or expansion of current practices on new acreage/fields. A map of farm fields can be submitted at the time of application.	Previously funded APNs will be eligible for funding for subsequent rounds, as long as new fields, where practice was not previously implemented, are selected for project.
	Allow practice to be moved to a different site or location flexibility as long as GHG benefits are being achieved.	CDFA is unable to make this allowance since the GHG reduction estimation for HSP in Comet-Planner assumes that each practice will be implemented for three years at the same field site. This requirement does not apply to one-time practices such as planting of permanent herbaceous and woody cover.
Practices	What is the status for Whole Orchard Recycling (WOR) to be incentivized by the HSP?	WOR has been proposed for inclusion under the HSP by CDFA and approved by the Environmental Farming Act - Science Advisory Panel. CDFA accepted public comments on this proposal between October 25, 2019 and November 15, 2019. (include outcome of comment process)
	Will biodegradable plastics be eligible for Mulching? What type materials can be used for Mulching?	No, only natural plant residues are eligible for funding for Mulching through the HSP. GHG reduction estimation in Comet-Planner is based on natural plant residues and not on manufactured or synthetic plastic products.
	Why is CDFA limiting the number of practices an applicant can do on a single APN?	CDFA does not limit the number of practices an applicant can do on a single APN. CDFA limits certain practices to be implemented on top of others on the same field since it leads to double counting of GHG reductions. These practices are listed on pages xx of the Request for Grant Applications (RGA).
	Reduction or limited use of pesticides should be incentivized through the HSP.	The HSP is designed to reduce greenhouse gases and build soil organic carbon. Reduction of pesticide use is outside the scope of the program.
	Mycorrhizae application should be incentivized through the HSP.	This practice was evaluated in the 2017-18 round of new practices evaluation and not recommended for inclusion in the HSP Incentives Program due to lack of peer-reviewed scientific data showing evidence of greenhouse gases reduction through mycorrhizae application. This practice is currently incentivized through HSP Demonstration Projects Type A that incentivizes data collection.
	Vermiculture operations and farms should be incentivized through the HSP.	Land application of vermicompost was evaluated in the 2017-18 round of new practices evaluation and not recommended for inclusion in the HSP Incentives Program due to lack of peer-reviewed scientific data showing evidence of greenhouse gases reduction through vermicompost application. Vermicompost land application is currently incentivized through HSP Demonstration Projects Type A that incentivizes data collection. HSP Demonstration Projects (Type A) do not fund the production of vermicompost at composting facilities or vermicompost operations.
	Create an alternative category "Perennial and Woody Crop Establishment on Annual Cropland" for Alley Cropping and Multistory Cropping - move them out from category group IV.	The HSP does not incentivize establishment of new orchards on existing annual cropland. Alley cropping and multi-story cropping allow planting of tree crops on annual cropland, limited to 20% of the total acreage.
	Non-overlapping practices: clarify that non-overlapping practices can be in the same APN, just not on top of each other.	CDFA has clarified this in the RGA.

	Allow one-time compost application on rangelands instead of 3 times during project term.	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.
	Add Re-saturation of Delta Organic Soils within Group 1 practices of the HSP.	CDFA will conduct a solicitation process to consider proposals for evaluation of new practices to be included in the HSP in early 2020. Proposals for new practices to be evaluated must be submitted through that process.
	Incentivize reduction of soil fumigants such chloropicrin, metam sodium and metam potassium through HSP	The HSP is designed to reduce greenhouse gases and build soil organic carbon. Reduction of pesticide use is outside the scope of the program.
Incentives: Payment Rate & Award limit	The payment for compost application is not enough. Price of delivering the compost can almost be as much as the compost.	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.
	Increase incentives payment rates to fully cover costs of practice implementation, using historical data from RCDs for projects they have managed in cooperation with producers. Offer applicants the option to develop their own budget (similar to SWEEP & AMMP) as an alternative, not a replacement of payment rates.	Standard Payment Rates currently utilized in the HSP do not require grant recipients to submit detailed receipts for all costs associated with implementation of each practice. In case of itemized budgets required by SWEEP and AMMP, grant recipients are required to maintain each receipt for reimbursement and auditing purposes. Additionally, itemized budgets require inclusion of quotes for services obtained in advance to support budgets at the time of application. Standard Payment Rates ease this burden off farmers and ranchers and allows CDFA to efficiently implement the HSP in a timely manner.
	Establish a minimum annual payment for small farms (e.g. \$1,500 per year) -NRCS began to offer in 2016.	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.
	Increase the maximum grant award (e.g. from \$75,000 to \$100,000).	New grant award amount is available for public comment in the draft released for comments on December 16, 2019.
	Gather data on the full costs of select practices and then update the 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.
	CDFA should ask for information about the farm and specific practices for which the farm is applying. With that information, CDFA can estimate the payment rather than asking individual farmers to estimate those payments. This shift would reduce the burden on farmers and ranchers, which is likely to increase interest and participation in the HSP.	CDFA is working to enhance Comet-Planner to include practice implementation costs, so that applicants would not be required to provide a separate excel-based budget worksheet. Applicants would be required to input the practice selection and acres associated with each practice, as this information is needed to calculate total project costs based on Standard Payment Rates.
	Urge CDFA to consider reimbursements for compost and cover crop seed purchases.	Compost and cover crop seed purchases are allowable costs covered by the HSP Standard Payment Rates.
Demonstration Projects Budget	Increase food allowance per person for demo outreach event (Current \$11/person).	Food allowance is based on allowed rates by State of California. CDFA is unable to change these rates.
	It takes too much effort from grantees to timekeep financial report documentation required by CDFA. Recommend to allow financial and administrative staff time in the budget and remove requirement to submit a Time & Activity Report.	Demonstration Projects recipients can charge staff time to grant. Time and Activity reports are required as documentation of disbursed funds for staff time for adequate government accountability. CDFA may be required to provide such documents if audited by the California Air Resources Board or California State Auditor's Office.
Funding allocation	Will CDFA break up the 28 million for Incentives and Demo? Do you have a certain number of grant for each program CDFA wants to fund?	Yes, CDFA will divide the \$28 million among Incentives and Demonstration Projects. CDFA will determine number of incentives and demonstration projects to be awarded based on applications received and reviewed.

Technical Assistance	Increase funds allocated to Technical Assistance Providers (TAPs).	CDFA increased TA funds from \$5,000 to \$20,000 per year through the latest solicitation.
	Allow TAPs/RCDs for higher indirect cost rates.	Indirect rates for technical assistance grants were increased from 10% to 20% for non-profits and RCDs as a result of public comments process conducted for the Climate Smart Agriculture Technical Assistance Grant Program.
	Is technical assistance available to small or rural schools for applying to HSP Demonstration Projects?	Technical assistance is limited to applicants of the HSP Incentives Programs. HSP Demonstration Projects applicants must partner with collaborators and partners with expertise in implementation of practices.
	It's good to have local technical service providers. This is faster than waiting for CDFA responses.	Thank you for the comment. CDFA is committed to provide funding for local TAPs.
Application Process & Timeline	The process to apply was very cumbersome. Support removing essay-type questions. The program could still be modified to be like the Carl Moyer Program. Instead of submitting complicated work plans, if there were a much simpler process, have a climate smart ag person help the growers with the complicated practices. Not every county has a resource to help them. Not everyone has internet to apply.	CDFA is editing the application questionnaire for ease and user-friendliness for farmers and ranchers. CDFA is investing over \$2 million in providing free-of-cost technical assistance so that farmers and ranchers can receive help in submitting applications. CDFA-funded TAPs are required to assist applicants located anywhere in the State and provide computer access. CDFA has additionally funded Climate Smart Agriculture Community Education Specialists through the University of California Cooperative Extension to provide free-of-cost Statewide assistance and computer access. A list of TAPs and UCCE Specialists is available at: https://www.cdfa.ca.gov/oefi/technical/
	Streamline application process to reduce the administrative burden on producers.	CDFA is editing the application questionnaire for ease and user-friendliness for farmers and ranchers.
	Support removing essay-type questions in the application.	CDFA is editing the application questionnaire for ease and user-friendliness for farmers and ranchers.
	I don't know which practices I need to implement and I don't have time to read all the CPS documents. What good is the program if the farmer doesn't know how the practice will help them?	Practice selection and implementation are critical business decisions that are best made by farmers and ranchers. Technical assistance providers can assist in such decisions. CDFA is investing over \$2 million in free-of-cost technical assistance so that farmers and ranchers can receive help in submitting applications. CDFA-funded TAPs are required to assist applicants located anywhere in the State and provide computer access. CDFA has additionally funded Climate Smart Agriculture Community Education Specialists through the University of California Cooperative Extension to provide free-of-cost Statewide assistance and computer access. A list of TAPs and UCCE Specialists is available at: https://www.cdfa.ca.gov/oefi/technical/
	Small and mid-sized farms don't have time or resources to do the application.	CDFA is investing over \$2 million in free-of-cost technical assistance so that farmers and ranchers can receive help in submitting applications. CDFA-funded TAPs are required to assist applicants located anywhere in the State and provide computer access. CDFA has additionally funded Climate Smart Agriculture Community Education Specialists through the University of California Cooperative Extension to provide free-of-cost Statewide assistance and computer access. A list of TAPs and UCCE Specialists is available at: https://www.cdfa.ca.gov/oefi/technical/
	It would be helpful to have application in Spanish. It is prohibitive for people who are limited in time, educational background, and English language.	In consultation with CDFA's Farm Equity Advisor, this suggestion is being evaluated to determine if adequate personnel and resources are available to support this effort.
	Recommend 12-week application period for the HSP through Feb-April, 8 weeks of application review and selection period through June, 8 weeks of grant agreement execution period through August so projects can begin in September.	CDFA proposes a 4-month rolling application period. 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.

	Urge CDFA to look for ways to reduce the complexities associated with participating in the HSP and to work with farmers and ranchers to identify current barriers preventing them from expanding their current efforts at improving soil health.	CDFA has taken this comment into consideration from past rounds and made significant improvements to the application process. CDFA is committed to continue to do so in future rounds.
	Application period is too short.	CDFA proposes a 4-month rolling application period. 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.
	The application has too many requirements.	CDFA is editing the application questionnaire for ease and user-friendliness for farmers and ranchers. Certain requirements are necessary to ensure that greenhouse gas reduction benefits achieved by funded projects can be verified, and to ensure accountability of expending public funds.
	Using Google Earth map to determine soil organic matter content greater than 20% for eligibility was too difficult.	CDFA is working on an integrated simplified application platform that will not require applicants to use Google Earth.
Benefits to Priority Populations	The section on the various disadvantaged communities and benefits is too long. Suggest CDFA to evaluate this information on behalf of applicants and complete Step 3 after selection of awards with each recipient.	AB 1550 Priority Population benefits are a criteria for prioritization during selection of projects to be awarded. Information regarding applicants' commitment to providing these benefits must be provided at the time of application in order to be evaluated.
Application Process	For individual applicants interested in the demonstration projects, what kind of paperwork is required to show the partnership between the individual and a university?	A letter from partner entity confirming their participation and agreement of roles identified in the proposal is needed.
	Can CDFA provide an example of a successful application from last year?	Individual applications can be requested through a Public Records Act request submitted to the CDFA Legal Office.
Eligibility	Are dairy forage crops such as silage corn eligible for HSP Demonstration Projects?	Yes.
	Do not support exclusion of urban farms from HSP Incentives Program as hundreds of small farms, often operated by socially disadvantaged farmers and ranchers, exist within city limits in California. Recommend replacing the term urban farms with a more precise description of what is ineligible so to prevent nonprofit, school and/or community gardens from funding.	CDFA will clarify this in the RGA.
	HSP should incentivize transition of conventional farms to organic farming.	CDFA's mission is to protect and promote all agriculture in California. The HSP is designed to serve both conventional and organic operations.
Outreach	120 attendees is too many. CDFA should use data from currently funded projects and re-determine the required number for various regions.	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.
	Allow inclusion of webinars and presentations to growers and growers' visits to the demo site outside formal field day events to count toward the required limit of outreach.	These data are already allowed in many cases, however they may not replace the requirement to conduct on-farm field days.
	For Type A projects, does the data collection include CO2 or all major greenhouse gases?	CDFA does not specify exactly which GHGs should be included in the project design. This selection is made by the applicant and evaluated by technical reviewers for scientific soundness. Most commonly, projects measure CO2 and N2O emissions.
	How does CDFA evaluate the GHG data collected by Demonstration Projects? It appears that data for year 3 is not being collected.	Data for Year 3 is collected by grant recipients of 2017 and 2017 Second Solicitation using matching funds. Grant recipients 2018 and beyond can utilize HSP grant funds to collect this data.

Data Collection and Use	Remove annual soil sampling requirement.	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.
	Is the program looking at microbial data?	HSP Demonstration Projects may include microbial data analysis in their proposals as necessary.
	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.
	Farmers and ranchers were never told their data would be made public, releasing their data without notifying them ahead of time and obtaining their consent would be a significant breach of trust and privacy.	All data submitted to government organizations is subject to Public Records Act requests. CDFA will add this information to the RGA.
Other	Encourage CDFA to consider block grant system for smaller producers to receive funds directly through a Technical Service Provider in order to remove administrative burden from smaller scale producers.	CDFA does not consider the block grant structure as appropriate for the HSP at this time.
Comments Received on Whole Orchard Recycling Comment Period: October 25 - November 15, 2019		
WOR	Consider allowing leaving fields fallow after incorporation of chipped orchards to allow for land-uses other than production, such as fallowing induced due to Sustainable Groundwater Management Act (SGMA).	CDFA has included fallowed fields after incorporation of wood chips as an option for WOR implementation.
	Consider allowing planting of perennial vegetative cover after incorporation of chipped orchards and funding them through HSP funding, such as cover crops conservation cover or forage and biomass planting.	Practices intended to establish permanent vegetative cover are intended to take land out of production permanently and must not be used in cases where an orchard may be re-planted after a few years. CDFA is evaluating the modeling efforts needed to accommodate the suggestion on allowing establishment of annual crops or annual cover on land after incorporation of chipped orchards.
	Consider enforcing a minimum number of tons of chipped orchards per acre when incentivizing the whole orchard recycling practice.	CDFA is evaluating modeling efforts needed to accommodate this suggestion.
HSP Programmatic Comments Received during Healthy Soils Listening Session 8/23/19		
Broad Programmatic Goals	There is a need to better understand the strategic goals of the program- what are the target levels of GGR, or numbers of farmers implementing projects? What are the program metrics? What are the co-benefits and strategic outcomes of HS practices? How do the program metrics fit into the bigger strategic picture of greenhouse gas reduction statewide?	This comment is considered as part of the larger inter-agency discussions around the Natural Working Lands Implementation Plan.
	Healthy Soils Program needs to be connected to the Greenhouse Gas Reduction and climate goals of other agencies	See above. The inter-agency Healthy Soils Initiative will be re-activated in 2020.