

**Comments Received on the CDFA Healthy Soils Program
Comment Period : July 25, 2018 - September 12, 2018**

Category	Comment Received (between July 25, 2018 and September 12, 2018)	CDFA Response
1. New Practices	Consider low inputs in farming so that extraction of fossil fuels is reduced.	Practices that reduce fossil fuel use in farming are outside the scope of the HSP. HSP focuses on practices that build soil health, rather than fuel-based GHG reductions. Technologies that achieve GHG reductions through use of renewable fuels are incentivized through other programs, such as CDFA's SWEEP and CARB's FARMER program.
	Incentivize the use of gypsum in soils.	Practice was not proposed during the new practices solicitation period in November - December 2017.
	Incentivize Class A biosolids application in soils.	Practice was not proposed during the new practices solicitation period in November - December 2017. Composted biosolids are eligible for funding under the compost application practices.
	Incentivize Integrated Pest Management (IPM) (CPS 595).	Practice was not proposed during the new practices solicitation period in November - December 2017. IPM has not been demonstrated to directly result in increase in soil carbon and reduce GHG emissions.
	Incentivize carbon dioxide crop enrichment.	Practice was not proposed during the new practices solicitation period in November - December 2017.
	Incentivize Hemp Sense soil enricher.	Practice was not proposed during the new practices solicitation period in November - December 2017. Proprietary products are not supported for incentives by CDFA.
2. Demonstration Projects	Create a separate funded program for research. Remove Type A projects from HSP Demonstration Program.	Research specific funding is not available. GHG emission reduction data for existing HSP practices are needed to further advance the modeled GHG reduction estimates for California.
	Do not support inclusion of Type A Research projects under HSP Demonstration Program.	Type A projects allow for future consideration of new practices in HSP for which existing published peer-reviewed scientific data are insufficient.
	Remove requirement for treatment and control fields in demonstration projects.	Control fields are necessary to show the differences and benefits achieved by implementation HSP practices on the farm.
	Increase the grant award amount for Type B projects.	CDFA is open to suggestions on other award amounts. Comment letter did not include a proposed grant award amount for evaluation and any supporting information.
	Allow project owners to decide how to do outreach in demonstration projects: reduce the requirement for 120 attendees for field days to 30 and allow for more one on one outreach. Replace 120 attendee requirement with SMART goals.	Number of attendees is critical to increase the level of deliverables by demonstration projects. SMART goals are currently allowed and encouraged, however minimum number of attendee requirement must be met. Number of required attendees was reduced from 300 to 120 in response to previous public comments collected through public meetings of the Environmental Farming Act Science Advisory Panel.
3. Cost of Practices - HSP Incentives Program	Not being able to use own compost is cost prohibitive; maximum grant amount is too small to be effective compared to the work of application submission and reporting.	CDFA has proposed inclusion of on-farm produced compost in future rounds of HSP.
	Improve compost reimbursement rate by allowing purchase of all 3 years of compost at once and apply in one year.	The practice of one-time application of higher rates of compost has been proposed as a Type A Demonstration Project practice for data collection and research, to facilitate publication of additional scientific data on this topic and to address nutrient management concerns associated with the application of larger quantities of compost.
	Take the real costs of the project into account. Provide grant recipients access to vendor information in their area of where to source project needs per your calculations. Cover labor costs as a separate line budget.	CDFA cannot endorse specific vendors or businesses. Labor cost is already considered in the Standard Payment Rates for practices. An itemized budget was replaced by Standard Payment Rates to minimize the burden of maintaining receipts, documents to support expenses, and reporting for the awarded farmers and ranchers.

4. Application Design	Include Farmer Equity Act of 2017 , assign 10 points to Socially Disadvantaged Farmers and Ranchers, distinct from DACs or SDACs. Add an SDFR checkbox to the application to ensure Farmer Equity Act compliance.	Under consideration. CDFA hired Farm Equity Advisor on September 20, 2018. HSP will work in close consultation with the Farm Equity Advisor to incorporate requirements related to the Farmer Equity Act of 2017.
	Provide easy application with pre-drafted menu instead of essay questions, reduce attachments.	New application platform under development includes some pre-drafted menu based questions. Some essay questions are necessary for competitive evaluation of submitted applications.
	Remove requirement for annual soil organic matter tests and instead ask for a reporting template with several narrative questions.	Soil organic matter tests are needed to determine if organic matter increases over time through implementation of HSP practices, and if not, helps understand reasons why. Soil organic matter tests are inexpensive and the cost of tests is covered by the HSP grant.
	Prioritize projects with multiple practices.	Prioritizing based on number of practices may discourage smaller operations proposing to implement fewer practices.
	Increase importance of environmental co-benefits including reduced pesticide use.	Environmental benefits are allocated up to 10 points in the scoring criteria. CDFA does not collect data on pesticide use and collecting such data would increase the implementation, data collection and reporting burden on the farmers and ranchers receiving grant awards.
	Provide a scoring rubric for the evaluation criteria.	Under consideration to provide in the Request for Grant Applications (RGA) for the next round.
	Support for improved budget sheet to be introduced.	Comment of support - thank you.
	Do not track awarded projects by APN as one APN can have multiple fields, not all included in the same grant application, or a new practice might be added to a field where a different practice was funded in the past. Suggest that CDFA track project by tracking parcel number AND field ID as most producers have field IDs registered with the County Agriculture Departments. This could be verified by the producer submitting a map, with parcel number information, ALL field ID information, and crop information in the beginning of the project as to ensure there is no "double funded" projects with in the same field ID perimeter.	Tracking by APNs provides a simplified application and verification process. Not all counties may have registered field IDs. Field IDs add several layers of complexity to the application, reporting and verification processes for CDFA as well as for awarded farmers and ranchers. Due to lack of time to fully implement this significant change, CDFA will not be able to evaluate this suggestion for inclusion in 2018 HSP. CDFA will consider this suggestion for future rounds of HSP.
	Support for upgrading application software to make it more user friendly for the producer and technical assistance partners.	Comment of support - thank you.
	New application platform should allow application sharing with Technical Assistance Providers.	Sharing application with Technical Assistance Providers is already allowed; applicant may share their log-in information for the application platform with Technical Assistance Providers.
	Allow real-time responses to questions submitted during the application period.	CDFA does not have resources for full-time staff for this service. Number of Q and A rounds have been increased from 3 in 2017 to 5 in upcoming 2018 round.
	Provide simpler application and faster way to inform applicant if CDFA did not receive application.	CDFA provides acknowledgement of receipt of application. If an acknowledgement is not received within 24 hours, then applicant should contact CDFA.

5. Outreach	Provide adequate outreach to Socially Disadvantaged Farmers and ranchers.	CDFA increased funds for technical assistance and outreach in 2018. CDFA will evaluate requirements regarding the Farmer Equity Act of 2017 in consultation with the Farm Equity Advisor to be considered in future technical assistance efforts.
	Provide multilingual materials (flyer, FAQs, sample application).	Technical Assistance Providers are encouraged to provide multilingual materials. CDFA will evaluate resources needed to provide multilingual materials and is working on a spanish version of the flyer.
6. Incentives Program - New Practices Proposed in November-December 2017	Support inclusion of nitrification inhibitors and slow release fertilizers under HSP Incentives Program.	CDFA proposes these practices to be included under HSP Incentives Program and HSP Demonstration Projects. Practices are already included in Comet Planner under CPS 590, Nutrient Management.
	Include compost tea application under HSP Incentives Program.	Practice is proposed as a Type A Demonstration Project practice for data collection and research, as characterization and user application rates need to be established for major crops to allow for quantification of GHG reductions, which is required for inclusion in the HSP Incentives Program.
	Include mycorrhizae application under HSP Incentives Program.	Practice is proposed as a Type A Demonstration Project practice for data collection and research, as published peer-reviewed scientific data establishing GHG reduction benefits with mycorrhizae are not available.
	Allow one time compost application to rangeland under HSP Incentives Program.	The practice of one-time application of higher rates of compost has been proposed as a Type A Demonstration Project practice for data collection and research, to facilitate publication of scientific data on this topic and to address nutrient management concerns associated with the application of larger quantities of compost. This practice is not currently in Comet Planner and more GHG reduction values need to be established for California for this practice.
	Refine QM to reflect refinement of integrated cropland ruminant grazing.	Integrated Cropland Ruminant Grazing is accommodated within the Prescribed Grazing practice, which is proposed by CDFA for inclusion under HSP Incentives Program and Demonstration Projects. Prescribed Grazing practice is already included in Comet Planner.
	Support for inclusion of conservation crop rotation and on-farm produced compost application practices in the HSP.	Comment of support - thank you.
	Support inclusion of vermicompost and Whole Orchard Recycling under HSP Incentives Program.	These practices are proposed as Type A Demonstration Project practices for data collection and research, as user application rates, demonstrated CA-wide GHG reduction benefits need to be established for inclusion under HSP Incentives Program.
	Do not support mycorrhizae application since no-till promotes mycorrhizae and provides their benefit.	Practice is proposed as a Type A Demonstration Project practice for data collection and research, as published peer-reviewed scientific data establishing GHG reduction benefits with mycorrhizae are not available.
	Do not support nitrification inhibitors and slow release fertilizers.	Reasons for lack of support not provided in letter.
	Support for new practices proposed for addition to HSP Incentives Program by CDFA.	Comment of support - thank you.
	Allow 3rd party verifications with RCDs.	Project verification has been included as a function for CDFA to minimize conflict of interest, since majority of RCDs are also Technical Assistance Providers for submission of applications.
	Allow 25% advance payments, make them easy.	CDFA is supportive of implementing this comment and the suggestion is being evaluated by CDFA Office of Grants Administration.
	If soil test requirements are included in the program, then CDFA should conduct tests OR allow for consultant costs and provide a standard protocol.	Cost of soil organic matter tests is covered by the HSP grant. CDFA provided a standard soil sampling protocol for collecting soil samples for testing in 2017. CDFA is revising the protocol for ease of use.

7. Grant Process	Support for allowing combination of HSP funds with EQIP funds and other cost-share sources, post-project requirements.	Comment of support - thank you.
	Support for removing the 3rd year cost-sharing requirement.	Comment of support - thank you.
	Support for extending the application period from 6 to 8 weeks.	Comment of support - thank you.
	Support for planning for a November through January application period to accommodate producer farming schedules.	Comment of support - thank you.
	Change the date implementation must start by in order to allow spring practices. If practices must be started by November 30, how does that accommodate spring practices, or the potential for late rains that might delay fall planting?	CDFA cannot reimburse costs for spring practices implemented prior to execution of grant agreements. CDFA will consider change of November 30 date to December 31, to allow for delays in fall plantings.
	Institute a 2-step application process with a short pre-proposal for HSP Demonstration Projects.	A two-stage review process is too long to be accommodated within 12 months, which include program development, public comment period, application submission, review and execution of grant agreements. This would limit CDFA's ability to fund all 3 years of the project term.
8. Technical Assistance	Allow more flexible payments for Technical Assistance Providers to pay for their outreach and support for implementation. More financial and technical support is needed from CDFA for conducting workshop day to work with applicants.	CDFA has increased the grant award amount for technical assistance from \$5,000 in 2017 to \$20,000 in 2018. Of the \$20,000, up to \$5,000 may be utilized to cover base expenses incurred by the providers, including staff time and outreach costs. Remainder funds are performance based, \$200 per individual assisted and \$400 for each submitted application.
	Technical Assistance Providers should be trained to better serve Socially Disadvantaged Farmers and Ranchers.	CDFA will evaluate requirements regarding the Farmer Equity Act of 2017 in consultation with the Farm Equity Advisor to be considered in future technical assistance efforts.
	Enhanced training for technical assistance providers to ensure the producers receive the best help possible.	Training is provided to technical assistance providers and on-demand assistance is provided to them from CDFA to address their queries.
9. General	CDFA made several improvements based on previous comments.	Comment of support - thank you.
	Need a public soil testing lab.	CDFA does not have resources for a public soil testing lab. Cost of soil organic matter tests required as part of the HSP are covered by the HSP grant.
	Are Cannabis growers eligible for funding through the HSP?	Projects must be located on a California agricultural operation. For the purpose of this program, an agricultural operation is defined as row, vineyard, field and tree crops, commercial nurseries, nursery stock production, and livestock and livestock product operations. This definition currently does not include cannabis.
Note - Green color indicates comments and suggestions CDFA is able to consider for inclusion in the Program.		