

**California Department of Food and Agriculture**  
**Healthy Soils – Block Grant Pilot Program**  
**Response to Public Comments Received Between November 16, 2022 – December 15, 2022**

#	Submitter	Comment Abstracts (Please see link below to retrieve submitted comments)	CDFA Response
1	Humboldt County RCD	The attractiveness of the block grant for our RCD is that we have seen that small farms are at a disadvantage in the regular HSP grant program, as the footprint of the practices on these small farms do not generate enough a positive CO2 sequestration in COMET, however, with the block grant, we were hoping to consolidate conservation practices across multiple small farms to generate at least the CO2 reduction minimum. For example, 3 small individual farms applying compost to their 3 fields would generate 1 MT of CO2 sequestered. Would that qualify for an approved project?	The project must achieve a net positive estimated GHG emissions to be eligible for funding. Projects may include different fields/APNs within in a project; however, program guidelines require that the grantee must have control of the land throughout the grant term and a unique tax ID associated with each project.
2	Community Environmental Council	In reviewing the draft RGA, a few questions arose. One, in appendix A, I noticed the payment rate for Prescribed Grazing was listed at \$5.26/acre for basic range, where it was listed at \$15.78 during the last HSP round. Perhaps this is an error? Also, I wanted clarification on if publicly owned but privately leased grazing lands are eligible. Much grazing occurs on public land permits and would benefit greatly from the incentive for better management. Additionally, I wanted to ask if biochar or rock dust applications are eligible under any existing practices?	Prescribed grazing payment rate is \$5.26/acre for basic range. Please review: <a href="https://www.cdfa.ca.gov/oefi/healthys oils/docs/2021_HSP_Incentives_RGA.pdf">https://www.cdfa.ca.gov/oefi/healthys oils/docs/2021_HSP_Incentives_RGA.pdf</a> page 47.  Biochar practice lacks sufficient research data to develop a quantification methodology and application rate. The biochar practice is eligible through HS Demonstration Program - Type A projects.

			Public lands may be eligible for funding if the applicant provides written approval from the land managing agency and a lease agreement.
3	DH Long Farming	<p>While Block Grant Program would help alleviate much of the workload for managing the grants for CDFA, based on our experience with other block grants, we are not in favor of this approach for several reasons: 1) With a middle management approach there's a lot more overhead that would impact available funding for farmers for implementing projects. 2) We've found it difficult to find agencies to partner with on block grants. For example, for the CDFA Pollination block grant, we could not find anyone willing to partner on a project with us to plant habitat on our farm as everyone we called said it would cost way too much for them to administer the project so not worth their time. 3) How would a designated agency (e.g. RCD) determine appropriate how many grants they might be giving out to farmers? Would agencies apply for and get a set amount of funding from CDFA and send a note out to the farming community sharing how many projects they could fund? We've liked working directly with key partners (e.g. compost suppliers) to get projects done on our farm rather than going through another agency that subcontracts with CDFA.</p>	<p>The HS Block Grant Pilot Program is developed based on stakeholder feedback to provide regional flexibility and build capacity at the local level. The block grant recipients will be required to provide robust outreach in their service areas.</p> <p>CDFA will post a list of the block grant recipients, their service areas, and other relevant information on the program website.</p> <p>Eligible organizations may request \$2-5 million and at minimum 80% of the total award amount will be disbursed for on-farm projects.</p>
4	Dotek LLC	The California Department of Food and Agriculture should include industrial-hemp to be an eligible crop for funding in the new Healthy Soils Block Grant program given its ability to sequester immense	Industrial Hemp is eligible for funding, provided grant beneficiaries are in compliance with all other state regulations.

		amounts of CO2 from the air, phytoremediation/soil nutrient enhancing qualities, minimal inputs, ability to serve as a base crop for a multitude of added-value agriculture products, low water consumption and suitability as a cover/rotation crop. The CDFA should focus its efforts on counties with airsheds defined PM 2.5 non-attainment areas by the federal EPA, high unemployment and large portions of residents being low-income to advance the State of California's push for equity.	CDFA's Climate Smart Programs are statewide programs and follows guidance to prioritize funding to Priority Populations as directed by funding agency.
5	Agromin	<p>Agromin provides following recommendations:</p> <ol style="list-style-type: none"> <li>1. We suggest that you announce who receives block grants so we can express our interest in participating in compost deployments.</li> <li>2. Our evidence is that the recommended compost application rates to limit nitrate leaching impact are not correct. They are based on compost properties of C/N ranges, instead of the C/N ratio of the compost-blended soil which we find more indicative of nitrate leaching risk through the soil matrix. In our experience, another risk of using compost and nitrate leaching is when the soil has inadequate infiltration (which compost can remediate) following application and heavy rainfall.</li> <li>3. We would like to see you include Biochar as a qualified amendment.</li> </ol>	<p>CDFA will post a list of the block grant recipients, their service areas, and other relevant information on the program website.</p> <p>CDFA in collaboration with CARB, developed GHG quantification methodology for the compost application practice, C:N ratio categories, and application rates based on the available science. These application rates were adopted through public discussion and the corresponding white paper is available for review on the HSP website. Agriculture operations must consider developing nutrient management plans for their operations to prevent excessive nutrient application and leaching sourced either from natural or synthetic fertilizers. Compost White</p>

			<p>Paper link:  <a href="https://www.cdfa.ca.gov/oefi/healthys oils/docs/CompostApplicationRate_WhitePaper.pdf">https://www.cdfa.ca.gov/oefi/healthys oils/docs/CompostApplicationRate_WhitePaper.pdf</a></p> <p>Biochar practice lacks sufficient research data to develop a quantification methodology and application rate. The biochar practice is eligible through the HS Demonstration Program: Type A projects.</p>
6	San Mateo RCD	<p>The Healthy Soils Program is a crucial program, especially for the small-scale farmers we serve, and we are grateful for the funding being offered by the state. As currently proposed, each block grant recipient is required to contract with technical assistance providers (TAPs). Additionally, CDFA will continue to offer contracts with TAPs to provide the same outreach and TA to the traditional HSP Incentives Program. San Mateo RCD recommends that rather than having separate TAP contracts connected to the HSP funding entity, CDFA should broaden the scope of their TA contracts so TAPs could provide outreach and technical assistance to the Healthy Soils Program generally, regardless of the funder. This approach would: technical assistance, avoid TAPs declining service because they don't have a contract with a specific funder, and lessen the confusion of funders, producers, and TAPs.</p> <p>We believe that if CDFA broadened the scope of contracts it holds with TAPs to enable them to provide</p>	<p>As block grant recipients will be solely responsible for successful disbursement of awarded funds, block grant recipients must have sufficient oversight on all elements of funds they administer. CDFA contracted TAPs assisting block grant recipients may complicate reporting requirements, and add an additional layer of mediation. CDFA intended to continue the CSA Technical Assistance Program for our traditional incentive programs.</p>

		<p>outreach and technical assistance to any Healthy Soils Implementation Grant recipient it would result in more effective, efficient, and locally relevant support to California's farmers and ranchers, and would meet CDFA's needs to reduce the workload on CDFA staff, as CDFA already plans to contract with TAPs for the traditional Healthy Soils Incentives Program.</p>	
7	Sonoma Marin Pasture Club	<p>We are in favor of the Block Grant System, because we feel that it will encourage the Program's outreach, be easier to navigate, and made available to more many farmers.</p> <p>Our experiences are that you cannot expect participation in a program like this from our members, on their own. Members have extensive experience with the NRCS, the RCD, the University. This allows them to not have to follow things down a rabbit hole, but rather a source to give them guidance and counselling, and most importantly, technical support, even down to the reporting.</p>	Thank you for your comments.
8	<p>California Strawberry Commission,</p> <p>California Apple Commission,</p> <p>California Wheat Commission,</p> <p>California Rice Commission,</p>	<p>Developed by legislative fiat, agricultural commissions are foundationally created to provide for the advertising and promotion of commodities, conducting market research and public education, which enables global market access and competition for California-grown products. Under the guidance of elected farmer leaders, Commissions allow their members to exercise self-determination and empowers them to guide the future of their respective industries. Commissions offer the Department an unprecedented opportunity to work with agricultural thought leaders and trusted partners to expand utilization of SWEEP and</p>	Agricultural commissions are eligible.

	California Avocado Commission, California Walnut Commission, California Blueberry Commission, Olive Growers Council of California	HSP, thereby rapidly accelerating adoption of climate smart management practices on-farm. Through grower-to-grower advocacy, the traditional barriers to adoption (i.e., distrust, cost, and time) can be better overcome with peer resources. Commissions also have experience managing and distributing large fund sources such as grower assessments, research initiatives, and U.S. Department of Agriculture's Specialty Crop Block Grants. Finally, as governmental entities operating within the framework of the California Department of Food and Agriculture (Department), commissions embrace accountability, access and equity which have become emblematic of HSP and SWEEP. As eligible recipients of block grants, these shared values will be further tended to.	
9	Marco Rinaldi - farmer	My family and I farm in both Tulare and Fresno counties. We are disappointed and upset to hear of your proposed Block Grant Recipient Program. This will not help us as California growers or aid us in becoming sustainable.	CDFA is exploring the Block Grant Program framework as a pilot program that promotes regional capacity building, flexibility, and service. This program became necessary due to high appropriations of funding, tight timelines to disburse funds, and limited program resources.
10	California Climate and Agriculture, Network Carbon Cycle Institute, Gold Ridge	We support CDFA in moving forward with this proposed block grant pilot. We appreciate CDFA's outreach and engagement efforts in developing and sharing this proposal, and the pilot's support for strategic partnerships and grantees that serve socially disadvantaged farmers. Recommendations for Draft Request for Grant Applications for HSP Block Grant Pilot:	CDFA will post a list of the block grant recipients, their service area, and other relevant information on the program website.  The program encourages applicants to provide outreach in multiple languages. Evaluation criteria

	RCD, Greater San Diego RCD, Sutter RCD, CARCD, Upper Salinas-Las Tablas RCD, California Certified Organic Farmers	<ol style="list-style-type: none"> <li>1. List all open applications and provide a map of relevant service areas of block grant recipients on a centralized website.</li> <li>2. Ensure all eligible California growers have the opportunity to apply for HSP and SWEEP by strengthening outreach criteria and building in oversight to on-farm project selection criteria.</li> <li>3. Increase the combined administrative and technical assistance cost rate to 25% and allow block grantees to have flexibility based on grower needs in allocating funds to administrative and technical assistance costs within a set percentage.</li> <li>4. Provide advance payment of 90% that is allowable under provisions of section 316.1.</li> <li>5. Lower minimum block grant award to \$1 million.</li> </ol>	<p>addresses community needs in the Statement of Needs section and is expected to score higher during the evaluation process if applicants provide multilingual outreach. The RGA will be revised to reflect the intent.</p> <p>Technical assistance funding is limited to 5% as directed by Assembly Bill (AB) 2377. Combining the administrative and technical assistance costs will not be feasible, as AB 2377 sets specific limits on technical assistance funds. Limiting the technical assistance to 5% of the total grant amount ensures that CDFA retains sufficient funds for the CSA Technical Assistance Program.</p> <p>The grant administration regulations do not specify a maximum advance payment by either percentage or dollar amount. However, the regulations specify that an advance payment shall not exceed the amount necessary for project expenses for a three-month period. The Department considered several risk factors to decide the allowable percentage of advance payment. A recurring advance payment of 25% provides a balance between department's fiduciary</p>
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			<p>responsibility, flexibly to the recipients, and reflects a level of funding appropriate to the three-month period limitation required by regulation.</p> <p>The program considered several factors to decide minimum and maximum award amounts, and the suggested range provides sufficient funds for block grant recipients to administer funds and provide technical assistance.</p>
11	Tomlinson Ag Consulting	<p>The utilization of the Block Grant program does not help California growers in implementation of practices that will increase soil health which is the goal of the program. It increases complexity of the process and slows implementation of practices by introducing an intermediate (Technical Assistance Providers) between the grower and CDFA. Furthermore, it is not clear that there are enough Technical Assistance Providers available to undertake this role. Historically, HSP funds have been heavily oversubscribed, and utilization of the Block Grant programs reduces the available funds for growers to implement the necessary practices to meet the objectives outlined by HSP. I would strongly encourage CDFA to re-evaluate the use of the Block Grant program.</p>	<p>CDFA is exploring the Block Grant Program framework as a pilot program that promotes regional capacity building, flexibility, and service. This program became necessary due to high appropriations of funding, tight timelines to disburse funds, and limited program resources.</p>
12	Etchegary Farms	<p>I am writing this public comment to express significant concern over CDFA's stated intention of pursuing the Block Grant Recipient Program for the next round of funding for the SWEEP and Healthy Soils Programs. The Block Grant Recipient Program further decreases the</p>	<p>CDFA is exploring the Block Grant Program framework as a pilot program that promotes regional capacity building, flexibility, and service. This program became necessary due to</p>



		<p>pools of funds that were already severely oversubscribed in past rounds, overcomplicates the application and implementation process, and forces growers to delay projects and practices that otherwise would have immediately increased efficiency and sustainability. As a grower, I strongly believe the traditional application process CDFA has utilized in the past for these programs will be much more effective in achieving sustainability in California agriculture, while achieving that sustainability in a much timelier fashion. With the above being said, I respectfully ask that you decide to use the traditional application process that CDFA has used in the past</p>	<p>high appropriations of funding, tight timelines to disburse funds, and limited program resources.</p>
13	California Farm Bureau	<p>The California Farm Bureau (Farm Bureau) supported last year's budget allocation in SB 154 for State Water Efficiency and Enhancement Program (SWEET) and Health Soils Program (HSP). Department has anticipated challenges with distributing this large sum of funding and has proposed this Pilot Program to distribute these funds as efficiently as possible. The Farm Bureau has concerns with the Pilot Program's language which states, "[Applicants] must prioritize assistance to Socially Disadvantaged Farmers and Ranchers (SDFRs), and ranches that are 500 acres or less." This language mandating participation does not reflect earlier language in the draft proposal which requires an applicant to take local interests into account when choosing awardees. It is unclear how this would be evaluated. What if an applicant is unable to secure 25%? Is the funding then rescinded? If only 10% of the applicants are SDFR, do other participants</p>	<p>AB 2377 (2018) directs CDFA to prioritize assistance to SDFR and farms smaller than 500 acres. The Office of Environmental Farming and Innovation will work within the bounds established by AB 2377 for technical assistance priorities and will follow the guidance of CDFA's Farm Equity Office in establishing targets for funding to SDFRs. AB 2377 indicates that CDFA must ensure that 25% of technical assistance funding is used to benefit SDFRs and requires that technical assistance providers prioritize their assistance to farms and ranchers of 500 acres or less.</p> <p>The program level goal will be to achieve the 25% targeted funding to</p>

		<p>get dropped so the applicant pool can meet the 25% standard? Farm Bureau supports prioritizing SDFR participants but is concerned about setting a requirement on application. Instead of requiring a percentage on each application, we encourage the draft to specify the program service 25% SDFRs, as is the case for other CDFA programs. This would be a feasible goal, that would maximize local participation. Farm Bureau also has concerns with the language regarding farm-size prioritization on participating growers. According to USDA figures, showed that nearly 72% of California operations are considered small family farms. This is an overwhelming majority of California producers and is likely not an appropriate variable either. We discourage the program predetermine the variable while discussions continue.</p>	<p>SDFRs. The block grant application will provide an opportunity for organizations to make a commitment to this 25% target or to provide justification of why 25% is not achievable because of the SDFR populations in their target geography. In the latter case, applicants must estimate the percent of grant funding they will commit to serve SDFRs and outline ways to achieve that target. Applicants will be scored on their ability to set and justify an ambitious SDFR target based on their target geography's SDFR demographics.</p>
14	Sierra Club California	<p>Sierra Club California provide following recommendations for HS Block Grant Pilot Program:</p> <ol style="list-style-type: none"> <li>1. A systematic framework for the design and analysis of data gathering for carbon sequestration in cropland that can explain the wide variations among Healthy Soils Program grantees.</li> <li>2. Reliance on Soil Organic Matter at this time, because it is currently the least expensive reliable proxy for measuring the soil microbial community.</li> <li>3. Transparency and NGO access to Soil Organic Matter (SOM) data and collaboration on options for analysis.</li> </ol>	<p>The Healthy Soils Program requires grantees to evaluate and report soil organic matter annually. The cost of soil organic matter evaluation is covered by the program. The Healthy Soils Demonstration Program provides funding for more rigorous data collection.</p> <p>The Program supports both conventional and organic agriculture systems. CDFA's Conservation Agriculture Planning Grants Program funds the development of various</p>

		<ol style="list-style-type: none"> <li>4. Separate funding for all future soil carbon data collection and funding for trials looking at correlation of new measuring methods with standard SOM lab tests.</li> <li>5. Flexibility for a regional entity to propose new approaches to incentivize systemic transition of the greatest number of acres of prime farmland by increasing above and below ground biodiversity for resilience and local food security.</li> <li>6. Expectations for more holistic, systemic change in a grant applicant's farming system to achieve higher carbon sequestration outcomes at an accelerated pace. This will most likely require more like 25% administrative costs if a regional entity wants to propose developing a creative program design and management offering to trial regionally appropriate practice enhancements and bundles and payments and evaluative testing recommended by successful practitioners.</li> <li>7. Higher payments for proposals that include an Organic Farm Plan or an auditable plan that minimizes use of chemical inputs, i.e. no use of high risk pesticides, along with a low application of artificial nitrogen or phosphorus fertilizer to the growing crop based on plant sap analysis.</li> <li>8. Creation of cooperative horizontal and vertical interlinkages for sharing about learning from observation and experience, measurements, analysis and reason, traditional ways, and intuition.</li> </ol>	<p>agricultural conservation plans related to Climate Smart Agriculture programs.</p> <p>The Program encourages applicants to select multiple practices to implement more holistic conservation on their farms. There are a total of 27 practices eligible for three agriculture systems.</p> <p>CDFA's Belowground Biodiversity Advisory Panel is reviewing current science to recommend parameters that could indicate soil health status. The report is due in summer 2023.</p> <p>To ensure state-wide participation and equity to all agricultural systems, the HS Program can't prioritize certain plans or practices over others.</p>
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15	Natural Resource Defense Council	<p>Natural Resources Defense Council opposes the Block Grant Pilot Program and provide follow recommendation:</p> <ol style="list-style-type: none"> <li>1. Hire Additional CDFA Staff to Address Root Cause of Grant Administration Problems</li> <li>2. Require Consistent, Verified, and Centralized Programmatic Data Collection, Reporting, and Accounting Specifically: <ol style="list-style-type: none"> <li>2a. Require BGRs to standardize their reporting of co-benefit outcomes from grants funded through HSP &amp; SWEEP including, but not limited to, carbon sequestration, water savings, emissions reductions, energy savings, and soil organic matter levels.</li> <li>2b. Create a centralized database that includes the data collected through the HSP and SWEEP grants funded through the block grant pilot. This database should be easily available to the public and programmatic data should be continuously uploaded to the database in a timely manner to allow for transparency of funds.</li> </ol> </li> <li>3. Maximize Environmental Benefits by Prioritizing Grants That Address BOTH Soil Health &amp; Water Use Efficiency Specifically: <ol style="list-style-type: none"> <li>3a. CDFA should identify geographical areas that can benefit most from a combination of soil health and irrigation efficiency projects, and work with Block Grant Recipients to target block</li> </ol> </li> </ol>	<p>The funds for Climate Smart Agriculture Programs are provided through one-time appropriations. The administration cost of these funds is limited to 5% of the total appropriation. It provides several challenges for hiring and developing workforce.</p> <p>CDFA will post a list of block grant recipients, their service area, and other relevant information on the program website. The Program will review and approve on-farm projects and audit a certain percentage of projects to ensure program requirements are met. The Program is expected to post on-farm awarded projects on program website like the traditional HS Incentives Program.</p> <p>The current SWEEP evaluation criteria provide additional points to projects that agree to implement healthy soil practices or are in priority areas such as critically over-drafted basins.</p>
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		<p>grant funds to those areas.</p> <p>3b. Create a new program deliverable in the Program Deliverables section that requires Block Grant Recipients to write how their funding decisions maximize water use efficiency and soil health benefits.</p>	
16	Dairy Cares	<p>The proposed block grant program offers an excellent opportunity for non-profit associations and others to assist farmers in identifying healthy soils practices for their farms, while also streamlining the disbursement of funds and technical assistance by leveraging the working relationships of NGOs, Resource Conservation Districts, extension specialists and others with farmers and ranchers. Creating incentives for increased composting on dairy farms was a key recommendation in the November 2022 final report of CDFA's Manure Recycling and Innovative Products Task Force. To that end, we recommend that CDFA structure the block grant program to do everything possible to a) encourage dairies to compost surplus manure to increase its value and facilitate export, and b) encourage other California farmers to utilize this manure.</p> <p>We are concerned that the current RGA language may create barriers for dairies that want to produce compost for other farms. Specifically, some of the language in the RGA states implies that farmers wanting to purchase compost from third parties may only do so if those facilities are "certified," specifically: "c. Compost used in this practice must be produced at the agricultural operation where the project is located.</p>	<p>On-farm produced compost is eligible for reimbursement.</p> <p>CDFA requires that any purchased compost must be produced by a facility permitted or otherwise authorized by state and local authorities that can demonstrate compliance with all state regulations regarding inspection of incoming feedstocks, finished-product testing requirements including processes to further reduce pathogens, maximum metal concentrations for heavy metals, and physical contamination limits. All compostable material handling facilities and operations are required to comply with the state minimum standards set forth in California Code of Regulations Title 14 (14 CCR) 14 CCR, Division 7, Chapter 3.1, Articles 5, 6, 7, 8, and 9. However, there is an exception for on-farm produced compost. As described in 14CCR, 17855(a)(1), "An activity is excluded if it handles</p>

		<p>Externally sourced compost must be purchased from a certified facility."1 [emphasis added] We recommend the last sentence above be revised to read "Externally sourced compost must be purchased from a permitted facility." [Emphasis added].</p> <p>Further, we recommend that CDFA collaborate with its sister agencies and other stakeholders to explore other options to incentivize and encourage use of dairy-sourced manure compost. We recognize that composting is subject to permitting and permitting exemptions from several agencies, and therefore these suggestions may take time to consider and implement.</p>	<p>agricultural material, derived from an agricultural site, and returns a similar amount of the material produced to that same agricultural site, or an agricultural site owned or leased by the owner, parent, or subsidiary of the composting activity. No more than an incidental amount of up to 1,000 cubic yards of compost product may be given away or sold annually." If an operation is permitted/regulated by other state agencies for environmental concerns, it is still subject to regulations set in 14 CCR, Division 7, Chapter 3.1, Articles 5, 6, 7, 8, and 9 to meet the state minimum standards for compost if more than 1,000 cubic yards of compost to be sold or given away.</p>
17	CAL G.A.P	<p>CalGAP has supported growers in making operational decisions that improve efficiency, profitability, and sustainability for over 15 years. One of the ways we provide value to our clients is by helping them receive funding for projects or practices to achieve those goals. The State Water Efficiency Program (SWEEP) and the Healthy Soils Incentives Program have both proven to be very effective tools for our clients. These programs provide great incentives and allow growers to take action with conservation efforts while also improving efficiency at the farm level. Last year alone we assisted almost 50 California growers in applying for funds through these programs and saw positive</p>	<p>CDFA is exploring the Block Grant Program framework as a pilot program that promotes regional capacity building, flexibility, and service. This program became necessary due to high appropriations of funding, tight timelines to disburse funds, and limited program resources.</p>

		<p>outcomes in each case. We believe the implementation of the Block Grant Recipient Program is at a huge disadvantage to the California agricultural community. With each Block Grant Recipient retaining up to 20% of funds, the pool of available resources will be decreased drastically. Both programs were already heavily oversubscribed in past rounds, which speaks to the need for these funds, and this program diminishes the amount that will be accessible to growers. The timeline proposed in the Request for Grant Applications shows that the earliest possible date for growers to apply to the Block Grant Recipients would be Fall of 2023. This would then push the timeline for implementation on the farm level to at least Summer of 2024. Overall, we do not believe that the Block Grant Recipient Program is an effective device for accomplishing the overall goals of these respective programs</p>	
18	Sustainable Conservation	<p>As a California-based environmental non-profit that advances the collaborative stewardship of California's land, air, and water for the benefit of nature and people, we support CDFA's various programs aimed at incentivizing California's farmers and ranchers to adopt climate-smart practices. We have also had the honor of co-chairing the 1383 Dairy and Livestock Taskforce Non-Digester working group as well as CDFA's Manure Recycling and Innovative Products (MRIP) Taskforce. It is through this work that we understand the need for – and the multiple benefits of – converting agricultural by-products into compost for the benefit of our water, air, and soils. Therefore, we are concerned with the</p>	<p>CDFA requires that any purchased compost must be produced by a facility permitted or otherwise authorized by state and local authorities that can demonstrate compliance with all state regulations regarding inspection of incoming feedstocks, finished-product testing requirements including processes to further reduce pathogens, maximum metal concentrations for heavy metals, and physical contamination limits. All compostable material handling</p>

	<p>following language on page 33 of 66 in the RGA that suggests compost produced on-farm would not be funded under the HSP unless it is (1) used on the same farm or (2) "certified."</p> <p>"c. Compost used in this practice must be produced at the agricultural operation where the project is located. Externally sourced compost must be purchased from a certified facility."</p> <p>We fully support the need to ensure that any compost incentivized under the HSP has quality controls and is from a permitted operation. These requirements are covered with the following language on page 32 of 66:</p> <p>"a. Compost must be produced by a facility permitted or otherwise authorized by state and local authorities that can demonstrate compliance with all state regulations."</p> <p>Certification is an additional process that can be costly and would limit the use of agricultural compost from operations that are permitted and have quality control measures yet have not pursued the extra step of certification. Additionally, it is stated that certification is "recommended" on page 32 of 66: "STA (US Composting Council's Seal of Testing Assurance Program) or CDFA-OIM (Organic Input Material) Program certified compost is recommended."</p> <p>In order to avoid unnecessary barriers to improved utilization of agricultural by-products and to avoid the confusion of stating in one place that certification is optional and in another place that certification is required, we encourage CDFA to edit the language on page 33 of 66 to the following (edit underlined):</p>	<p>facilities and operations are required to comply with the state minimum standards set forth in California Code of Regulations Title 14 (14 CCR) 14 CCR, Division 7, Chapter 3.1, Articles 5, 6, 7, 8, and 9. The only exception is for on-farm produced compost when no more than an incidental amount of up to 1,000 cubic yards of compost product may be given away or sold annually, as described in 14CCR, 17855(a)(1).</p> <p>Compost sources must be sourced from a certified facility which could be listed on following websites:</p> <ol style="list-style-type: none"> <li>1. <a href="#">SWIS Facility/Site Search</a></li> <li>2. <a href="#">Registered OIM Products</a></li> <li>3. <a href="#">STA Certified Compost Participants</a></li> </ol> <p>The RGA language on page 32 will be revised to clarify the intent that the certification is required, not recommended.</p>
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		<p>"c. Compost used in this practice must be produced at the agricultural operation where the project is located. Externally sourced compost must be purchased from a permitted operation."</p>	
19	UC ANR	<p>UC ANR academics and Community Education Specialists have participated as Technical Assistance Providers (TAPs) or proposal reviewers for (HSP, SWEEP, AMMP, DDRDP) since 2015. ANR understands the need to shift responsibilities and is concerned about program integrity. Suggested programmatic considerations or modifications are provided with each concern.</p> <ol style="list-style-type: none"> <li>1. Equitable distribution of funding to growers across California and consistent delivery of quality programming statewide.  Suggestions: A) Standardize and centralize procedures to maintain equity, prevent conflicts of interest, promote transparency and accountability, and provide farmer applicants with clear information and an efficient application process. B) Allow for different payment rates based on region and practice type to cover implementation costs. C) CDFA conduct periodic audits of block grant organizations and establish procedures to resolve issues that may arise in the administration of block grant funds.</li> <li>2. Potential for lack of uniformity for application submission, reviews, and selection of projects to be awarded.  Suggestions: A) CDFA establish and require use of standard criteria for review and funding of</li> </ol>	<p>CDFA is committed to equitable disbursement of funds. All submitted applications will be scored on equity along with other criteria - the program will review the language to ensure program commitment on equity is clearly reflected.</p> <p>All block grant recipients will be required to provide an on-farm project selection process as part of their application, which will be scored accordingly to ensure that the process is transparent, equitable, and accountable.</p> <p>HSP staff will approve on-farm projects that will meet program standards. CDFA will conduct audits to ensure program requirements are met. Further block recipients will provide reports on their progress.</p> <p>Program staff is expected to train block grant recipients on program requirements to ensure that program standards are met. All on-farm project</p>

		<p>applications. B) CDFA create and maintain a centralized website, standardized application portal, question and answer document, and notification system with clear CDFA HSP and SWEEP branding for the benefit of growers and block grant recipients. C) CDFA establish clear guidelines that prohibit the organization from requiring any nonessential information D) CDFA require block grant recipients to run a competitive grant application process. E) CDFA maintain an email address, phone number, and/or web form so that farmer applicants can directly report any problems or issues in their experience with block grant recipient organizations. F) Use of an unbiased third-party review panel for grower project applications</p> <p>3. Ability of grantee organization to reach underrepresented farmers and ranchers. Suggestion: Establish a standardized schedule for all organizations and maintain announcements on CDFA's website: A) CDFA coordinate with block grant recipients to identify timeline for application submission windows. B) Allow applicants and organization to transfer application to another organization</p> <p>4. Meeting needs to include underserved/underrepresented farmers and ranchers as required by legislation; burden placed on growers and existing TAPs in navigating and applying to new HSP and SWEEP programs across the state.</p>	<p>implementation will be required to meet already established program standards to ensure each project delivers the expected benefits to the state. The program intends to provide flexibility to block grant recipients on the application submission process, and they may choose the competitive process or first come, first served based.</p> <p>CDFA will post a list of block grant recipients, their service area, and other relevant information on the program website. The Program provides maximum flexibility within the bounds of program requirements and encumbrance and liquidation deadlines. Program staff will revise the RGA language to ensure that block grant recipients collect only information that is needed for their selection process and required for reporting.</p> <p>The Program will ensure that the HSP email address and other relevant contact information is available on our website for the public to share their experience.</p> <p>The Program encourages the block grant recipients to contract with third</p>
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		<p>Suggestions: A) UC ANR proposes allowing flexibility for block grant recipients to extend and revise projects beyond their initial deadline. B) Reduce the number of practices eligible for funding (HSP &amp; SWEEP). C) Streamline project implementation and verification for SWEEP to key critical control components (flowmeter, soil moisture sensor, data to show water savings). D) Allow flexibility to contract once approved to reduce contractual burden.</p> <p>5. Loss of grower relationships in communities with established TAPs.</p> <p>Suggestions: A) Continue existing TAPs and provide updated training for new TAPs to ensure continuity in service provided to farmers. B) Maintain a central list of TAPs and circulate regularly so applicants are reassured their provider is trained.</p>	<p>party subject matter experts to review on-farm projects. Block grant applicants are required to provide detailed selection processes as part of their application.</p> <p>The Program intends to provide flexibility to block grant recipients on the selection process as well as the timeline. HSP staff will review and provide final approval on all on-farm projects to ensure that one farm operation receives only one award. Block grant recipients are expected to conduct robust outreach to ensure farming communities in their service area are aware of the funding opportunity. Block grant recipients may choose to share applications provided they have funds available.</p> <p>The Program provides flexibility on setting and extending deadlines. The HSP eligible practices were selected based on public input and the program intends to maintain eligible practices.</p> <p>CDFA is expected to continue with the Climate Smart Agriculture Technical Assistance Program. HSP is expected to maintain and strengthen the existing</p>
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			relationship with TAPs. OEFI programs will continue to provide training to TAPs.
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- Original copies of public comments received are available on [Healthy Soils Program](#) website.