



Pollinator Habitat Program
Office of Environmental Farming and Innovation (OEFI)
California Department of Food and Agriculture (CDFA)
cdfa.oefi@cdfa.ca.gov

RE: Pollinator Habitat Program RGA

April 18, 2022

Dear OEFI,

Thank you for the opportunity to submit comments on the draft Request for Grant Applications (RGA) for the Pollinator Habitat Program. We are thrilled that funding will be available for planting pollinator habitat on farms and ranches, along with technical assistance. Funding, technical support, and practice knowledge are all needed to encourage habitat plantings on farms. In reviewing the RGA, we have several comments as follows:

- 1) Developing a budget for this project is going to be challenging because one would have to connect with ranchers and farmers prior to submitting an RGA to find out what type of project they're interested in. This would involve considerable time and expense and beyond the ability of most non-profits. Can a startup grant be provided to help staff with outreach for identifying farmers and ranchers and developing budgets?
- 2) Capital outlay for implementing numerous projects (up to a million) will be challenging, especially for non-profits that would need to carry a huge expenses prior reimbursement. Suggest including language that 25% of the costs for the specific habitat plantings will be allowed upfront.
- 3) Need clarification on, "Provide training on integrated pest management to protect pollinators to partner farmers and ranchers," pg. 16 of the RGA. What metrics are needed to document that this goal has been reached?
- 4) There needs to be an option for applying for funding to plant riparian habitat (trees and shrubs on our waterways) as these plants provide critically needed habitat for pollinators. Suggest adding NRCS practice standard Riparian Forest Buffer, Code 391.

- 5) We would like to advocate for 'Annual Habitat' plantings to be included in this RGA. A number of growers are successfully planting annual flowering plants on farms to attract beneficial insects (pollinators and natural enemies) and this practice should be promoted. We suggest including NRCS Conservation Practice Standard, Alley Cropping, Code 311.
- 6) This program appears to favor taking land out of production for planting habitat, which is not necessary. There are lots of possibilities for planting habitat on land that cannot be farmed. This includes along streams, drainage ditches, terraces left over from land leveling, along old fence lines, under electrical lines, and on corner pieces. Perhaps modify some of the language to favor integrating habitat with farming operations.

Thank you again for the opportunity to comment on this program. We look forward to participating in the RGA.

Sincerely,

Rachael Long

Rachael Long, Farm Advisor
UCCE Capitol Corridor, 70 Cottonwood St., Woodland, CA 95695, rflong@ucanr.edu

Shelly Conner, Deputy Director
Wild Farm Alliance, shellyconnor@wildfarmalliance.org

April 18, 2022

California Department of Food and Agriculture
1220 N Street
Sacramento, California, 95814
Attention: The Office of Environmental Farming

Re: CDFA Pollinator Habitat Program – Comments from Project *Apis m.*

Project *Apis m.* has been working on behalf of pollinators in California since 2007. Formed by beekeepers and almond growers, our nonprofit has provided nearly \$10Million for applied honey bee health and pollination research, and our Seeds for Bees program has installed over 55,000 acres of blooming cover crop in working lands. Experience working with growers in agriculture has shown us that practices which support pollinators can have collateral value to many species while also adding value with soil health and resource management. We are excited to see two years of new funding for the CDFA Pollinator Habitat Program, and hope to see it well-used, with practical implementation, and maximum benefits to pollinators, growers, and CDFA. We also hope this endeavor will be used to include diverse perspectives and increase collaboration amongst the many organizations working on behalf of pollinators in California.

Project *Apis m.* has successfully provided cover crop seed mixes using species that are neither all native, nor invasive, which offer important value for both growers and pollinators. As the cost and availability of native seed adjusts to these opportunities, we hope there will be flexibility around the selection of plant species eligible for this program. We hope for considerations optimizing the balance of practical availability, cost effectiveness, pollinator value and likelihood of successful establishment. We ask that the criteria, review and selection of the projects be a transparent and inclusive- and as a member of the California Pollinator Coalition, we hope this program will invite input from our diverse interests and expertise, to deliver success in making agriculture an active part of the solution for pollinators.

Project *Apis m.* thanks CDFA for this support to increase pollinator habitat, we are happy to help in any way we can to make this a successful program in the working lands of California- on which consumers, growers and pollinators all rely.

Thank you,



Danielle Downey
Executive Director



California Department of Food and Agriculture
1220 N Street
Sacramento, CA 95814
Attention: Pollinator Habitat Program
Comments on the Draft RPG for the Pollinator Habitat Program

April 18th, 2022

To the staff managing the Pollinator Habitat Program:

The California Association of Resource Conservation Districts (CARCD) and the Resource Conservation Districts (RCDs) and partners who are submitting this letter are grateful for the opportunity to comment on the draft RGP for CDFA's Pollinator Habitat Program. We are appreciative of the opportunity to get more habitat on the ground on working lands afforded by the program and are particularly pleased to see the prioritization of working with SDFRs that is evident in the draft. We believe that the program could be improved further, especially to the benefit of SDFRs, if the following comments were considered and adopted:

- **Urban farms:** USDA is recognizing the importance of urban agriculture through grants for planning and implementation, but it is not clear that projects on urban farms are eligible for funding under this grant. Given the prioritization of SDFRs evident in the draft RGP, we strongly urge CDFA to explicitly allow projects on urban farms and to include clarifying language to help grantees assess eligibility. We also recommend that

CDFA reconsider its exclusion of community gardens as eligible sites (as they provide wonderful locations for pollinator habitat as well as opportunities for education about the importance of pollinators) and/or that it consider certain requirements community gardens would need to meet to be eligible.

- **Land ownership/long lease requirements:** It is not clear if the same land ownership/lease requirements that exist in the Healthy Soils program will apply to this program. Some RCDS have put lots of effort into working with disadvantaged farmers on HSP applications only to have them rejected due to land ownership issues, and we strongly urge CDFA to clarify rules around land tenure and to make it as easy as possible for RCDs and other grantees to implement projects on lands that are operated by SDFRs even if not owned outright.
- **Indirect rate:** Allowing grantees to charge full indirect rates if they have a NICRA with the Federal Government would make it possible for them to recover true indirect costs. We would appreciate clarification on this point, and if charging negotiated rates is not allowed, we would like to see an explanation of the reasoning behind the prohibition.

We sincerely thank the staff at CDFA for preparing the grant program public review draft, and for accepting our feedback. We look forward to collaborating on pollinator habitat projects with a focus on farms and ranches owned and operated by SDFRs.

Sincerely,

Karen Buhr, Executive Director, CARCD

Britanny Jensen, Executive Director, Gold Ridge RCD

Lucas Patzek, Executive Director, Napa County RCD

Darcy Cook, District Manager, Mission RCD

Devin Best, Executive Director, Upper Salinas-Las Tablas RCD

Chris Rose, Executive Director, Solano RCD

Simarjit Singh Bains, Project Manager, Sutter RCD

Adria Arko, Senior Program Manager: Climate and Agriculture, San Mateo RCD

Wendy Caldwell, Executive Director, Monarch Joint Venture



April 18, 2021

Karen Ross, Secretary
California Department of Food & Agriculture
1220 N Street
Sacramento, CA 95814

Re: Draft Pollinator Habitat Proposal

Dear Secretary Ross:

The California Farm Bureau Federation (Farm Bureau) respectfully writes to offer comments on the release of the California Department of Food and Agriculture's (Department) Draft Pollinator Habitat Proposal (Draft). Farm Bureau is a non-governmental, non-profit organization representing nearly 32,000 farming members, including over 20,000 small farms, whose purpose is to protect and promote agricultural interests throughout the State and to find solutions to the problems facing agricultural businesses and the rural community.

Farm Bureau supported last year's AB 391 (Villapudua, 2021) which would have appropriated funds to incentivize participation in state and federal conservation programs targeted to improve or enhance pollinator habitat and forage. Ultimately, this funding was granted through SB 170 (Skinner, Chapter 240, Statutes of 2021) in the amount of \$15 million to the Department. Farm Bureau was pleased that this was included in the final budget, as we are actively engaged on pollinator issues on a state and federal level. We are a founding member of the California Pollinator Coalition and promote pollinator practices to our membership. Many of our members have already subscribed to public and private programs to incorporate these practices, and we were excited that additional funding would allow more farmers and ranchers the opportunity to implement management practices on-farm.

As drafted, however, the Farm Bureau has many concerns with the proposal; we offer the following comments in consideration:

Firstly, Farm Bureau strongly objects to prohibiting farmers and ranchers from direct access to these funds. Contrarily, doing so would remove added administrative costs of third-party providers and allow more funding to go towards on-farm practices. Many Departmental programs follow this direct farmer/rancher model, including SWEEP, Healthy Soils, AMMP, etc., and have proven successful. Under the current draft, intermediaries are required to have demonstrated expertise and experience in pollinator habitat restoration or pollinator related conservations management practices. Farm Bureau believes that growers, in fact,

have this on the ground, practical experience and expertise. Furthermore, the program encourages farmers to provide financial commitment outside of grant funds. If farmers must commit financially to the program, why wouldn't they be able to administer the program and practices themselves?

Secondarily, we are concerned with the amount of funding proposed to awardee organizations for direct and indirect costs associated with implementation. On page 4 of the Draft, the maximum award is \$1 million of which \$180,000 is available for direct and indirect costs. However, on page 10 of the Draft, eligible organizations may claim a maximum indirect cost rate of 25%. It is unclear if this is in addition to the initial 18% carve out, or if entities can claim between 18%-25% for costs related to their administration of the grants. With a \$15 million appropriation, with a conservative 5% for departmental costs, at a 18-25% cost allowance, \$3.6 million of the funds could be available for third party's direct and indirect costs. Farm Bureau believes these funds would be better utilized to expand acreage and farms incorporating and increasing pollinator habitats.

Consider the two prior concerns, rather than having the third party be grant recipients and submit a monitoring plan per parcel, the Department could offer funds to farmers, develop a model that individual farmers and ranchers could complete and submit. Any technical assistance needed could be considered as part of the broader Office of Environmental Farming Act programmatic offerings. In order to remain compliant, participants could submit electronic data including geotagged pictures and purchase receipts to show practice expenses.

In addition to a flawed structure, the current program also contains ill-crafted language regarding acreage restrictions on participating growers. Within this portion of the Draft, priority would be offered to operations that are under 500 acres. Presumably this is to allow for adoption by small to mid-sized farms, however, a 500-acre vegetable farm can be quite lucrative, whereas a 500-acre orchard or ranch is not. Therefore, prioritizing growers based on acreage is not an appropriate proxy for farm finances and disenfranchisement. Especially when a program is trying to include as many types of agricultural commodities as possible, this does not service that goal. In fact, in March the State Board of Food and Agriculture had a discussion on farm size considerations and various organizations presented on the challenges of the variables that could or should not be used to dictate farm sizes In California. For example, USDA presented on statewide data based on Gross Cash Farm Income rather than acreage. These numbers, according to USDA figures, showed that nearly 72% of California operations are considered small family farms.ⁱ 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.

The Draft continues to cite USDA-NRCS practices that are eligible for grant funding. Historically, Californians operate at a loss when implementing NRCS practices due to the high regulatory threshold that is required of agricultural operations. In addition to these high standards, California is facing another historic drought which is directly affecting farm's productivity. It is not evident if the payment rate for NRCS practices, listed in the Draft, would be enough for farmers and ranchers to implement. Supply chain issues and drastically increasing inflation rates are affecting California's producer's productivity. It would be helpful if the Department used NRCS standards, but then added a local focus to payment rates in order to address California's current crises.

Lastly, Farm Bureau has concerns with the scoring criteria for third-party applicants. The merit of each application will be determined by the below scoring criteria:

Criteria	Maximum Points
Qualifications of Applicant	10
Strategic Partnerships	5
Workplan Merit and Feasibility	15
Budget	10
Commitment to Expending 25% of Funding to Support Pollinator Habitat with SDFR Partners	10
Total	50

Farm Bureau believes that if a third party is the applicant - receiving and dispersing the funds to farmers and ranchers, "strategic partnerships" require more weight in the scoring process. Applicant's existing relationships and partnerships within the community will be crucial to the success of the whole program. Conversely, the "qualifications of the applicant" should be weighed less. Should farmers and ranchers be punished due to the applicant's lack of qualifications? The farmer and rancher may be more than qualified to implement practices on their own operation, and may have previous experience from participating in other state and federal programs. Farm Bureau also has concerns with having 20% of the scoring weight on the applicant's commitment to expending 25% of funding to support SDFR partners. 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 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 specify the program, as a whole, service 25% SDFRs, as is the case for other CDFA programs. These would be a feasible goal, that would maximize local participation.

Farm Bureau is supportive of promoting pollinator practices on farms and ranchers throughout the state. As previously stated, we are concerned with the method of grant distribution and high administrative costs associated with that. We look forward to working with the Department in the coming months to ensure increased habitats for pollinators. It is our intention to continue to be an active participant in the stakeholder process and represent the interests of our membership. Thank you for considering these comments. If you have any questions, please contact Katie Little at (916) 446-4647 or klittle@cbbf.com.

Sincerely,



Katie Little
Policy Advocate

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https://www.nass.usda.gov/Publications/AgCensus/2017/Full_Report/Volume_1,_Chapter_1_State_Level/California/st06_1_0005_0006.pdf

Re: Draft Request for Grant Applications for the Pollinator Habitat Program.
California Department of Food and Agriculture
Office of Environmental Farming and Innovation
April 18, 2022

To Whom It May Concern,

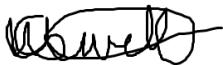
Thank you for the opportunity to comment on the Draft Request for Grant Applications for the Pollinator Habitat Program. We are the Xerces Society for Invertebrate Conservation. We have a very active presence in the state of California working with farmers to create pollinator habitat both through our partnership with the NRCS and food industry initiatives.

Our high priority feedback for the draft includes:

- RFP should emphasize native pollinators and native plants
- The timeframe of the grant period seems short considering an awardee would not have participating farms enrolled until well into the first year. Year two would be site prep and year three planting. This does not leave much room for onboarding staff, delays due to weather, materials etc. and other unforeseen interruptions to schedules.
- Are urban farms specifically excluded? The language in the section titled "On-Farm Project Eligibility" is not clear on this. This eligibility is especially important if the goal is to prioritize historically underserved and BIPOC partners.
- No mention of protecting habitat from pesticides. This should be addressed.

In summary, we are very excited about the opportunities that this grant program will provide. The substantial sum of money available to grantees will go a long way to making agricultural areas in the state healthier and safer for pollinators. Please see below for additional lower priority feedback.

Sincerely,



Cameron Newell
Pollinator Conservation Specialist, California
Bee Better Certified Program Coordinator
The Xerces Society for Invertebrate Conservation

In Need of Clarification:

- RFP states that projects should prioritize ‘pollinator species of regional concern’. What does this mean?
- Is the \$180,000 for direct and indirect costs available to all awardee organizations combined or to each organization?
- Is the amount available for direct and indirect costs adjusted based on total funding amount?
- Do partner agricultural commodity groups need to be based in CA?
- Outcome monitoring is not clear. What are people monitoring for? Habitat establishment? Pollinator populations?
- Fee structure is unclear. How is the cost of the materials for projects being addressed? There will be a direct cost to purchase the materials, yet Appendix A lists flat rates. How will this be tracked for reporting purposes?
- References to IPM are vague and confusing.
- There’s a vague reference to Comet-planner. How does this fit into overall project?
- Three years of monitoring and reporting required after the grant ends and to be considered ‘cost share’. How is that going to work? What level of monitoring and reporting is required? This could add significant costs to the work.

APPENDIX A: PHP Payment Rates, Implementation Guidelines and Requirements

- A lot of inconsistencies between rates, practices etc including:
 - Different practices attached to different agricultural systems
 - When the same practice is listed for different agricultural systems, the payment rate changes...why?
 - Why doesn’t grazing land include riparian herbaceous cover? (All land uses should probably include this)
- Why isn’t riparian shrub planting included as a practice anywhere?
- Recommend include plug planting options for ALL herbaceous planting
- Inconsistencies in seeding rates. Recommend 30-50 PLS/ft². (21 seems too low)
- Change hedgerow width to 10’ instead of 15’. This is more achievable.
- Why do croplands say ‘replace a strip of cropland...’? This unlikely to be readily adopted. Planting habitat features in unused peripheral areas is more likely.
- 4% milkweed for ‘monarch’ projects seems very low
- Inconsistency regarding native plants in practices. Shouldn’t they all require a certain percentage (eg.75%-80%) be native?



Pollinator Partnership

600 Montgomery, Street, Suite 440

San Francisco, CA 94111

415.362.1137

www.pollinator.org

April 18, 2022

California Department of Food and Agriculture
1220 N Street
Sacramento, California, 95814
Attention: The Office of Environmental Farming

Re: CDFA Pollinator Habitat Program – Comments from Pollinator Partnership

Thank you for the opportunity to comment on the proposed CDFA Pollinator Habitat Program. As a non-profit dedicated exclusively to the health of pollinators for over 25 years, we are very excited about the prospect of bringing so much new habitat into California's working lands. We also have the expressed goal of coupling both increased and sustainable agricultural production AND sustainable health for pollinators. We need both, and through smart management and incentives we can achieve this critical goal.

California has very specific and unique demands on agriculture at the moment. Increasing temperatures and the longest sustained drought in history is the backdrop against which the demands for safety, equity, productivity, and sustainability are received by growers. As part of the organizing team for the California Pollinator Coalition, we know that the ongoing conversation about including pollinator habitat on-farm is gaining momentum but is still just beginning in some sectors. We are sensing both enthusiasm as well as some skepticism in the community, and we want to strive to make this program as successful as possible for all those concerned – the Growers, the NGO's, the Tribes, the CDFA and the Pollinators.

It is exciting to have the potential for two years of funding at the \$14,500,000 level, and we would be wise to think carefully about every aspect of this new program so that we can report on immediate progress (to secure next year's funding), and we can project long-term results. We have some suggestions and would love the opportunity to explain them or answer any questions.

Comment 1: We appreciate the fact that the payment schedule for PHP Practices is generally an increase over that offered by other programs. This will help interest growers on multiple levels. We suggest consideration of even more favorable cost-share arrangements for the SDFR community, as we have discussed this with growers for whom their cost-share obligation is beyond reach.

Comment 2: We applaud the mandate to use native plants "where feasible." The grantees selected through the CDFA Pollinator Habitat Program will be competing with several other grant opportunities that may be in play at exactly the same moment (The Wildlife Conservation Board program through CARCD; the Climate Smart Commodity program; an RCPP that we have submitted to NRCS that will involve support for NRCS practices for pollinators, the NFWF monarch grants currently in play, and

more). Demand for native plants has been huge to date, and this new activity will add more pressure to deliver natives, though this demand will be unlikely to reduce the considerable cost for these plants. Many non-invasive, introduced species have been shown to provide quite adequate pollinator habitat, offering considerable improvement in the man-made agricultural landscape at reduced costs and may be effective alternatives.

Comment 3: (Page 4, paragraph 4 “Funding and Duration”)

Suggestion - Increase the length of the grant to 4 years.

It will take the first two years to recruit the participants, select and prepare habitat sites, secure plant materials, and plant the habitat, sometimes requiring specialized planting equipment. Year three is when we will see the plants establish. (In a five-year assessment we conducted for the USDA FSA, we noted that year three and beyond is when most habitat is established and begins to make a productive contribution to the landscape). Ideally, monitoring would begin in the first year with a baseline assessment, and continue each year. Absent that, year four could be the start of the monitoring program (measuring the enhancement of acreage) and could use some grant funding to establish the protocol. Year four would also include the final report and would populate it with more robust information as the plants would be established by then. The subsequent two years of monitoring (which are required but unfunded) would be “off grant”; by then, the monitoring protocol would be established and should be easier to replicate, producing at least three years of data at a minimum. This would also give more time for plant establishment that could be in evidence for the “exit interview” with the awardee and the on-site visits.

Comment 4: (Page 6, paragraph 1 “Program Requirements and Restrictions”)

Suggestion - Clarify bullet one; we suggest it be re-written to state – “The cost of grant recipient’s collaborative and technical assistance efforts is included in this funding, and grant recipients must not charge additional fees to the farmers and ranchers for these services.”

Comment 5: In several sections Scientific Teams which have authority to review the applications and the progress reports are mentioned. We feel it is important to disclose the criteria for selection and the names and organizations of the scientific teams. We also seek clarity about the eligibility of these individuals and their organizations to apply for the grants.

We are very excited about this grant program and plan to apply to participate in this original approach to increase habitat; we believe that this is an opportunity to make a real and demonstrable difference for pollinators and for the working lands of California. Again, we are standing by to clarify or answer any questions and have included our email addresses below.

Thank you again for asking the public to provide input into this program; it has been a privilege to add our perspective based on our 25 years of land conservation and habitat creation for pollinators here in California and across North America.

Best regards,



Kelly Rourke
Executive Director
kr@pollinator.org



Laurie Davies Adams
Director of Programs
LDA@pollinator.org



State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 Wildlife Branch
 P.O. Box 944209
 Sacramento, CA 94244-2090
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



April 18, 2022

California Department of Food and Agriculture
 1220 N Street
 Sacramento, CA

RE: Draft RGA for the 2022 Pollinator Habitat Program

Thank you for the opportunity to comment on the draft Request for Grant Applications (RGA) for your new Pollinator Habitat Program (PHP). As a steward of California wildlife and their habitats, the California Department of Fish and Wildlife looks forward to addition of pollinator habitat in agricultural producing regions throughout the state. We maintain a list of Terrestrial and Vernal Pool Invertebrates of Conservation Priority (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157415&inline>) which can be used to identify regional pollinator species of concern, as indicated on page 7 of Section "Identification of On-Farm Project Sites and Agricultural Partners" in the RGA.

In the spirit of collaboration, we offer the following recommendations for how to strengthen CDFA's proposed Pollinator Habitat Program (PHP) to better support monarchs and other pollinators:

The scope of the pollinator habitat program closely aligns with existing Natural Resource Conservation Services (NRCS) practices and payment rates. CDFA's proposed PHP, however, includes a smaller set of supported pollinator-beneficial practices than NRCS has recognized in the past. By focusing on a subset of practices, the potential benefit of the PHP is limited. We recommend expanding to the full set of practices included in *Using 2014 Farm Bill Programs for Pollinator Conservation*¹. In terms of payment rates, it would be helpful to solicit input from growers— as you do through your Healthy Soils Program— to determine whether the NRCS-set rates are sufficient.

Habitat within agricultural areas is particularly important for migratory pollinator species, such as the monarch butterfly². The Western Association of Fish and Wildlife Agencies (WAFWA) 50-year Western Monarch Conservation Plan³ highlights the need to create additional breeding and migratory habitat for monarchs within the Central Valley, setting a goal of 50,000 additional acres by 2029. The PHP is set to make significant headway towards this goal. In order to track progress, we recommend that CDFA add all completed habitat projects into the WAFWA Crucial Habitat Assessment Tool (CHAT), which is a centralized online tracking software program than anonymizes location to protect private landowners.

¹ Skinner, M and M Vaughan. 2015. Using 2014 Farm Bill Programs for Pollinator Conservation. Biology Technical Note No. 78, 3rd Ed. United States Department of Agriculture.

² Crone, EE, EM Pelton, LM Brown, CC Thomas, and CB Schultz. 2019. Why are monarch butterflies declining in the West? Understanding the importance of multiple correlated drivers. *Ecological Applications*, 29(7): e01975.

³ Western Association of Fish and Wildlife Agencies. 2019. Western monarch butterfly conservation plan, 2019-2069. Version 1.0.

Other objectives, such as outreach or technical assistance, can also be tracked in the CHAT. More information about the CHAT can be found here: <https://monarchchat.org/>

The top agriculture crops produced in California use pesticides to some extent. Studies have documented both direct and indirect adverse impacts of insecticides on invertebrate pollinators⁴. Providing pollinator-friendly habitat on or adjacent to crop fields could expose pollinators to pesticides^{5,6}. California's Managed Pollinator Protection Plan⁷ recommends best management practices (BMPs) that protect honey bees from pesticide exposure. These BMPs could be incorporated into grant-funded projects to protect native crop pollinators as well, including applying pesticides with short residual toxicity to bees and avoiding application to habitats and crops when bees are foraging. Additional practices that could further protect pollinators from direct and indirect exposure due to drift or run-off include creating spatial buffers or vegetative barriers of non-attractive plants such as evergreen trees between habitat areas and sprayed fields. While training on Integrated Pest Management (IPM) is identified as part of the technical assistance applicants should provide to participants in the Pollinator Health Program, it is not a required element and IPM is not an eligible practice. We recommend including NRCS conservation practice 595 Integrated Pest Management (IPM) as an eligible practice in the PHP.

Larger areas of habitat, as well as small-scale habitats in close proximity to one another have the potential to better support larger metapopulations of pollinators⁸. The PHP has the potential to help create corridors or patchworks small habitat networks throughout the Central Valley to increase connectivity for pollinators and other wildlife. This could be accomplished by using a recently published model that proposes corridors along agricultural margins⁹ and increasing payment rates in areas that align with identified corridors. Habitat in other areas should still be supported, but projects in target corridors can be weighted more heavily.

Thank you for taking our comments into consideration and for expanding opportunities to conserve pollinators in California.

Sincerely,

DocuSigned by:

 7543E85CBE88445...

Scott Gardner

Branch Chief, Wildlife Branch

California Department of Fish and Wildlife

⁴ Ara, ZG and AR Haque. 2021. A Comprehensive review on synthetic insecticides: toxicity to pollinators, associated risk to food security, and management approaches. *Journal of Biosystems Engineering*, 46(3), pp.254-272.

⁵ Ward, LT, ML Hladik, A Guzman, S Winsemius, A Bautista, C Kremen, and NJ Mills. 2022. Pesticide exposure of wild bees and honey bees foraging from field border flowers in intensively managed agriculture areas. *Science of The Total Environment*, 154697.

⁶ Halsch, CA, A Code, SM Hoyle, JA Fordyce, N Baert, and ML Forister. 2020. Pesticide contamination of milkweeds across the agricultural, urban, and open spaces of low-elevation northern California. *Frontiers in Ecology and Evolution*, 8: 62.

⁷ California Department of Pesticide Regulation. 2018. California's Managed Pollinator Protection Plan. <http://www.cdpr.ca.gov/docs/enforce/pollinators/index.htm>

⁸ Ponisio, LC, P de Valpine, LK M'Gonigle, and C Kremen. 2019. Proximity of restored hedgerows interacts with local floral diversity and species' traits to shape long-term pollinator metacommunity dynamics. *Ecology Letters*, 22(7): 1048-1060.

⁹ Dilts, TE, S Black, S Hoyle, S Jepsen, E May, and M Forister. 2022. Agricultural margins could enhance landscape connectivity for pollinating insects across the Central Valley of California, USA. *bioRxiv*. Preprint available at: <https://www.biorxiv.org/content/10.1101/2022.04.06.487372v1.full.pdf>



April 18, 2022

California Department of Food and Agriculture
1220 N Street
Sacramento, California, 95814
Attention: The Office of Environmental Farming

RE: Draft Pollinator Habitat Program Comments Request for Grant Applications

The Almond Alliance of California (AAC) along with the Almond Board of California (ABC) appreciate the opportunity to provide comments on the Draft Pollinator Habitat Program Request for Grant Applications. The AAC and the ABC work together to provide regulators with a better understanding of how specific issues impact the California almond industry.

There are about 7,600 almond growers in California according to the 2017 USDA Agricultural Census, with 2021 production forecasted to be around 3 billion pounds. Almonds are put into commercial channels by approximately 100 handlers. Virtually 100% of U.S. commercial almond production is in California; grown on over 1.5 million acres throughout the Central Valley. California produces over 80% of the global supply of almonds.

Almond farmers are naturally attuned to the importance of pollinators and to protecting pollinators. With pollination services now over \$400 per acre, representing from 15-20 percent of the annual cost of production, almond growers know they need to protect that investment. This is evident in the nearly 60% reduction in pesticide use during the dormant season, including bloom, in the 23% increase in pollinator cover crop planting, and the over 100,000 acres of almonds that have been registered as Bee Friendly Farms in the last 2 years. The almond industry's leadership in co-founding the California Pollinator Coalition demonstrates taking that commitment beyond honeybees to benefit all pollinators through implementing practices on working lands.

Facilitating the implementation of these practices on California's working lands are also how we achieve the State's ambitious climate and natural resources goals, including the Governor's Executive Order N-82- 20, charging the State to conserve 30% of habitat for biodiversity by 2030 and enacting climate resiliency. To achieve these aims, numerous states, federal, agricultural, and conservation organizations have recognized this co-beneficial opportunity and developed resources to expand pollinator habitat and forage on farms and ranches. Scaling these individual efforts requires bringing together critical elements of public and private investment and building partnerships with farmers and ranchers to achieve biodiversity while retaining the economic prosperity of the nation's leading agricultural economy.

Last year the AAC sponsored, AB 391 (Villapudua) "Pollinator habitat conservation: funding," to provide grants and technical assistance directly for agricultural growers to participate in pollinator habitat and forage programs. And as stated by the author, "working



lands offer an unprecedented opportunity to expand habitat and forage for pollinators. To better engage growers in delivering solutions that benefit pollinators, state investment through this bill is critical to accelerating adoption, embedding pollinator practices within California's working landscapes."

As the bill's sponsor, we were thrilled to see AB 391 included in the Governor's May Revise, with increased funding, showing a significant level of commitment to developing a state Pollinator and Habitat Program. The outcome as established by the Budget Act of 2021 (Senate Bill 170, Skinner) allocated \$15 million to the California Department of Food and Agriculture (CDFA) was made for the fiscal year 2021-2022 to provide grant funding for the establishment of pollinator habitat on agricultural lands throughout California. However, as currently drafted there are several questions, comments, and concerns with the Draft Pollinator Habitat Program Request for Grant Applications. Please see below:

Funding and Duration

As stated in this section, **"The Pollinator Habitat Program will provide up to \$14.5 million in funding to established and experienced organizations to work directly with farmers and ranchers to install habitat and implement management practices that support pollinators."** Eligible entities as defined in this section include Resource Conservation Districts, University of California, California State University, California Community Colleges, Non-profits, and Tribes. What is the reason(s) and need(s) for these funds to go through the education entities listed above? Our recommendation would be for funds to go directly to growers/grower partners to collaborate on the planning and programming to invest in pollinator habitats and forage on working lands.

Furthermore, in this section, block grant awards are proposed for three years – why was this timeline chosen, and is this the proper amount of time for the awarded grant? We would recommend a least 48 months to see this program planned and developed properly for maximum outcomes and success.

Also, in this section, the grant award has a cap of \$1,000,000. How was this number chosen and why? Is this amount enough to properly plan, develop, and implement a successful pollinator habitat program?

Finally, in this section, an **"Awarded project must be complete and operational no later than 36 months after the start of the grant agreement."** We believe this timeline is too short and needs to be increased at the minimum to 48 months. This is consistent with our comment above regarding the proposed block grant award.

Eligibility and Exclusions

When reviewing this section, non-profits are defined as **"Including, but not limited to Land Trusts with the conservation of agricultural lands as their mission or amongst their stated purposes."** Under this draft, non-profits are eligible to receive a grant award. As currently drafted would like to request that clarifying language to ensure non-profits who purchase agricultural land and who plan to transition it out of agricultural production are not eligible for an award. In addition, it should be clarified that any agriculture non-



profit should be eligible to receive a grant award if they meet the requirements outlined in this program.

Timeline

When will CDFA provide clarity and specific dates on the program application activity timeline? Have there been any considerations in waiting for the Budget Act of 2022 to pass the Legislature and be chaptered with the additional investment for the Pollinator Habitat Program before starting the application process?

Program Requirements and Restrictions

This section states, **“Grant recipients must not charge fees to provide technical assistance or collaborate with farmers and ranchers.”** However, the Budget section (pages 9,10), clearly states the recipients can charge for administering, providing technical assistance, etc. This is confusing as to what is considered “fees” and should be clarified by CDFA. Furthermore, we suggest a cap on the amount of funds to the grant recipient for administration and technical assistance, versus the amount to reimburse farmers. We would like to ensure the majority of the funds are being spent on pollinator habitat and forage.

Furthermore, the section, states **“Grant recipients must prioritize Socially Disadvantaged Farmers and Ranchers (SDFRs) and farms and ranches that are 500 acres or less when selecting farmer/rancher project partners. CDFA encourages applications from organizations that serve small to medium-sized and socially disadvantaged California food producers and farm workers, including but not limited to BIMPOC (Black, Indigenous, Multiracial, and People of Color), LGBTQ+, women, and veterans.”** While we respect the opportunity to prioritize SDFR farmers and ranchers, we would like clarity as to why the term **“and”** less than 500 acres is included? Why was the term **“or”** not used? This is very specific to what Recipients must prioritize. In addition, could we please better understand where the 500 acres as a priority originated from and why it was used as a priority? Also, since CDFA is encouraging applications from BIMPOC, is this group considered an additional eligible entity. If so, it should be added to the eligible list above.

Planning and Implementation of Conservation Management Practices for Pollinator Benefit

In this section, **“Recipients of PHP funds will work with farmers to implement projects. Recipients may be involved in project design, vendor coordination, matching funds coordination, and project management.”** The term “matching funds” is used for the first time in this document. Is there an expectation for matching funds from a Recipient? Please clarify.

Furthermore, in this section, **“Activities associated with project planning and technical assistance include but are not limited to providing training on integrated pest management to protect pollinators to partner farmers and ranchers.”** Could this please be explained in greater detail? Also, the **“Development of an Outcome Monitoring**



Plan to monitor the outcomes of practice implementation over 3 years after project implementation.” What is the cost of this, and will the grant have to be used to cover the cost? If so, these costs would take away from the original intent of the program.

Technical Review

This section states, **“The second level of review is a technical review to evaluate the merits of the application and overall expected success of the project, including the potential for the project to provide lasting habitat for pollinators. The technical reviewers are experts affiliated with CDFA’s Plant Health Division, Plant Pest Diagnostics Laboratory, and/or the University of California and California State University systems.”** Since the University of California and California State Universities are eligible as Recipients to receive grant awards, how is this not considered a conflict?

Budget Cost Categories “Allowable Costs”

Earlier, on page 6, it says grant recipients cannot charge fees, but the allowable costs include administration costs above the grower payments. What are “fees” that should be clarified. We would strongly favor a percentage cap on the administrative and technical assistance costs to ensure that the majority of funds go to the grower costs of putting habitat in place. This section states several different allowable costs to be included and budgeted for in the Pollinator Habitat Program. Given the nature of the program is to plan, develop, and implement a successful program, under the allowable cost section, there should be language added to the “Supplies” section to include “seed development” or “seed production.” This inclusion will be critical to ensure there are adequate seeds readily available for agriculture production.

Scoring Criteria

This section states, **“Past performance in the OEFI’s Climate Smart Agriculture Programs (e.g., Healthy Soils Demonstration Program, Climate Smart Agriculture Technical Assistance Program), if applicable, may be taken into consideration during selection.”** This should only be applicable if the past performance included the pollinator practices (E.g., Applying compost is totally different than installing a pollinator habitat). This should be made clear under this section.

Payment Process

This section states, **“The PHP is a reimbursement grant program. CDFA will provide the grant Recipient with the necessary grant award and invoicing documents for the reimbursement process. Recipients will be required to submit quarterly invoices for costs associated with outreach, provision of technical assistance to farmers and ranchers, and practice implementation. These costs will be reimbursed based upon the line-item budget (part 1) submitted with the application.”** For consideration, this section should include a statement to allow for reimbursement of the upfront cost for producing seed and or nursery stock.

Advanced Payments

If selected for funding, **“Recipients may be eligible for an advance payment of up to 25 percent of the grant award, subject to the provisions of section 316.1 “Advance Payments” of the California Code of Regulations, Division 1, Chapter 5.”** Consistent



with the above comment in the “payment process” section could you please clarify if this includes seed and nursery stock?

Quarterly Progress Report

This section states, **“On a quarterly basis the Recipient will submit a progress report (template to be provided by CDFA) and on-farm project details to CDFA’s PHP scientific team for review.”** Could you please provide who are the members of the Pollinator Habitat Program scientific team and how selected for this role? Additionally, what are the criteria to be a part of the scientific team and how long will they serve?

Final Report and Project Verification

This section states, **“At the close of the grant agreement the Recipient will submit a final report (template to be provided). The final report will gather metrics such as total acreage of practices implemented, number of farmer/rancher partners, and number of SDFR partners. Additionally, Recipients will submit a Comet-Planner report for each on-farm project site. Only practices in Comet-Planner will be included in the Comet-Planner report. Also, you must submit documentation of integrated pest management training provided to partner farmers and ranchers.”** While this section lists the criteria that outline the requirements for the final report and project verification, it lists COMET Planner for each on-farm site. Is this an editing mistake from using the Healthy Soils Program as a draft? If not, then this should be explained and included up-front as that is significantly more work for the grant recipients than just habitat technical assistance. Similarly, the final report requires the submission of documentation of integrated pest management training provided. This is not described in the document elsewhere and should be to ensure applicants understand the requirements for this part.

Reimbursable Practices

All the habitat/forage practices, other than the woody/trees, require native plants. There are well-adapted and quality forage plants that are more readily available and cost-effective. Given the high costs of establishing permanent habitats such as hedgerows, this restriction to solely native plants would significantly reduce participation in the program.

Closing

We appreciate the opportunity to provide input to the CDFA on the Draft Pollinator Habitat Program Request for Grant Applications. We believe that there are multiple opportunities for the almond industry to partner with CDFA to implement and innovate a successful Pollinator Habitat Program. We look forward to our continued partnership with the CDFA and your responses.

Sincerely,

A handwritten signature in black ink, appearing to read "Aubrey Bettencourt".

Aubrey Bettencourt
President, Almond Alliance of California



The Almond Alliance of California is a non-profit trade association dedicated to advocating on behalf of the California Almond industry and is organized to promote the interests of its members. AAC members include almond processors, hullers/shellers, growers and allied businesses. AAC is dedicated to educating state legislators, policy makers and regulatory officials about the California almond community. As a membership-based organization, we raise awareness, knowledge, address current issues and provide a better understanding about the scope, size, value and sustainability of the California almond community.

Established in 1950, the Almond Board of California is a grower-enacted Federal Marketing Order (FMO) under the supervision of the U.S. Department of Agriculture. The FMO administers a broad-based mandatory program which spans incoming and outgoing quality, compliance, food safety, industry education, market development, and research on the growing, nutrition, and food safety of almonds. The ABC is financed through an assessment collected from growers on each pound of edible almonds they deliver to handlers.