

CDFA Pollinator Habitat Program (PHP)

Summary and Responses to Public Comments Received

Public comments for the first PHP draft Request for Proposals were accepted between March 17, 2022 and April 18, 2022

Rachael Long (UC Cooperative Extension) and Shelly Conner (Wild Farm Alliance)	
Summary of Comments	CDFA Response to Comments
Would like a start-up grant to help staff with outreach for identifying farmers and ranchers developing budgets.	CDFA intends to maximize the grant term to be as long as can be administratively, to allow for adequate implementation time. Clarifying language will be provided in the RGA to allow for the applicant to request a total amount for practices and to provide the details later of what is to be planted and the area of the planting or practice.
Would like for 25% of the costs for the specific habitat planting to be allowed up front.	Recipients may request 25% of the grant as an advance payment. This advance may be used for any aspect of the project.
What metrics are needed to document the goal of providing training on integrated pest management to protect pollinators to farmers and ranchers?	CDFA will require a certificate that the organization provided the training to ranchers and farmers. In addition, copies of the training materials (pamphlets, presentations, etc.) will need to be provided to CDFA.
Would like NRCS practice standard Riparian Forest Buffer, Code 391 to be added.	NRCS Conservation Practice Standard (CPS) 391 will be included as an eligible practice for funding and CDFA will evaluate additional practices from the USDA Biology Technical Note "Using 2014 Farm Bill Programs for Pollinator Conservation" for inclusion.
Would like 'Annual Habitat' plantings to be included. Thus, would suggest including NRCS practice, Alley Cropping, Code 311.	CDFA will evaluate additional practices from the USDA Biology Technical Note "Using 2014 Farm Bill Programs for Pollinator Conservation" for inclusion
Would like language to be modified to favor integrating habitat with farming operations.	Clarifying language will be included in the RGA.

Danielle Downey (Project Apis m.)	
Summary of Comments	CDFA Response to Comments
Would like flexibility around the selection of plant species eligible for this program. Would like considerations optimizing the balance of practical availability, cost effectiveness, pollinator value, and likelihood of successful establishment.	CDFA will provide clarifying language to allow for that flexibility.
Would like that the criteria, review, and selection of the projects to be transparent and inclusive.	CDFA will provide a detailed scoring criteria in the final Request for Grant Applications. The final scoring criteria matrix will include details of the scoring considerations for each of the scoring categories (criteria). The technical reviewers will consist of scientific experts at state agencies and partner agencies to avoid conflicts of interest from eligible entities.
Would like that the program invite input from the diverse interests and expertise of members of the California Pollinator Coalition, to deliver success in making agriculture an active part of the solution for pollinators.	CDFA provides opportunity for public feedback on the program framework and draft request for grant applications through the public comment opportunity and through the public meetings of the Environmental Farming Act Science Advisory Panel. Additional opportunities to provide input may be scheduled and will be announced through a CDFA news release. Information will be posted on the program website. Please consider signing up for email notifications to be made aware of public input opportunities.

The California Association of Resource Conservation Districts (CARCD) and the Resource Conservation Districts (RCDs) and partners - Karen Buhr, Executive Director, CARCD; Brittany 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

Summary of Comments	CDFA Response to Comments
Would like urban farms to be explicitly included.	The section explicitly excluding urban farms will be removed; therefore, urban farms will be eligible.
Would like community gardens to be eligible sites or at least consider certain requirements community gardens would need to meet eligibility.	The section explicitly excluding community gardens will be removed; therefore, community gardens will be eligible.
Would like CDFA to clarify rules around land tenure and to make it easy for RCDs and other grantees to implement projects on lands that are operated by SDFRs even if not owned outright.	During the application phase, applicants will not need to identify the farmers and ranchers that they will work with to implement projects. Following the award, and through progress reports, the awardees will provide a letter of commitment to the project from each farm involved. This letter of commitment will not need to include information on land ownership nor tenure but will indicate commitment to completing and maintaining the project for the project life.
Would like for grants to be allowed to charge full indirect rates if they have a NICRA with the Federal Government so that they can recover true indirect costs. Would appreciate clarification on this point, and if charging negotiated rates is not allowed, would like to see an explanation of the reasoning behind the prohibition.	The Pollinator Habit Program (PHP) is not a Federally funded program. Federally Negotiated Indirect Cost Rates (NICRA) have no direct applicability to the program and there is no expectation of reciprocity or carryover on indirect from Federal to State or other sources. The administrative burden for both recipient and grantmaking agencies is substantially different in State and Federal programs. Generally, state grant programs allow for greater flexibility whether costs may be charged directly than would be permissible in a Federal NICRA, which may offset difference in percentage of indirect costs available from State to Federal grants.

Katie Little (California Farm Bureau)	
Summary of Comments	CDFA Response to Comments
Would like farmers and ranchers to have direct access to funds.	CDFA must balance providing assistance directly to farmers and ranchers with administrative demands within CDFA. Technical assistance is a critical component of the Pollinator Habitat Program and for that reason and for administrative logistics related to costs and timelines, providing grants to qualified organizations to work with farmers and ranchers is most feasible.
Confused about the indirect costs. It's unclear if it's 18% or 25%, but either way that amount is too large and would be better spent going directly to farmers/ranchers.	Up to 18% of the total award (maximum of \$360,000 for a \$2 M award) can support cost of applicant organization to implement activities, which may include indirect up to 25% of total direct cost. The 18% will include technical assistance and administrative tasks
If money could go directly to ranchers and farmers technical assistance for them could be considered part of the broader Office of Environmental Farming Act programmatic offerings. In addition, participants could submit electronic data including geotagged pictures and purchase receipts to show practice expenses.	The Climate Smart Agriculture Technical assistance program was established by AB 2377 (2018) to support the SWEEP, AMMP and HSP programs. Although the PHP could potentially be supported in a similar way, having a separate TA solicitation impacts the program timelines and for the PHP program a longer grant implementation term is likely critical to success of projects. Additionally, including the TA in the program balances administrative expenses for CDFA.
Would like there to not be a prioritization for certain size farms.	The language that provides emphasis to farms and ranches of 500 acres will be removed. The program's equity goals will be focused on supporting on-farm projects for Socially Disadvantaged Farmers and Ranchers through points provided in the technical review criteria.
Would like the CDFA to use NRCS standards, but then to add a local focus to payment rates in order to address California's current crises.	The PHP program is doubling the NRCS CPS payment rates. Clarifying language will be provided in the RGA.
Would like strategic partnerships to have more weight in scoring. Would like qualifications of the applicant to be weighed less.	Partnerships between an eligible organization and a commodity group will be weighted more heavily in the final RGA, while maintaining an emphasis on the qualifications of the lead applicant.

Katie Little (California Farm Bureau)	
Summary of Comments	CDFA Response to Comments
<p>Concerned about 20% of the scoring weight on the applicant's commitment to expending 25% of funding to support SDFR partners. Instead of requiring a percentage on each application, would like the program, as a whole, to service 25% SDFRs, as is the case for other CDFA programs.</p>	<p>CDFA has heard, through other technical assistance program feedback opportunities, that the commitment to dedicate 25% of funds to SDFRs is not possible for all based upon the farmer demographics in some regions of the state. For this reason, CDFA has determined that making this commitment part of the scoring criteria is appropriate and will encourage applicants to make this commitment, if possible, in their service area. The commitment will be strongly weighted in the scoring criteria.</p>

Cameron Newell (The Xerces Society for Invertebrate Conservation)	
Summary of Comments	CDFA Response to Comments
RFP should emphasize native pollinators and native plants.	The RGA, to align with the language of the funding appropriation in SB 170 (Budget Act of 2021) the PHP does provide language prioritizing, but not requiring 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.	CDFA will support a grant term as long as possible based upon encumbrance and liquidation deadlines. Adequate time is necessary for program development, application period, grant execution, and project implementation.
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.	The section explicitly excluding urban farms will be removed; therefore, urban farms will be eligible.
No mention of protecting habitat from pesticides. This should be addressed.	Language in the RGA will be changed to include guidance to follow the BMPs from the California's Managed Pollinator Protection Plan. Additionally, Recipients will be required to provide Integrated Pest Management training to farmer and rancher partners.
RFP states that projects should prioritize 'pollinator species of regional concern'. What does this mean?	CDFA will provide opportunity for the applicant to describe their focus and that may include species of regional concern, this will contribute to the merit and feasibility score.
Is the \$180,000 for direct and indirect costs available to all awardee organizations combined or to each organization?	Up to 18% of the total award (maximum of \$360,000 for a \$2 M award) can support cost of applicant organization to implement activities, which may include indirect up to 25% of total direct cost. The 18% will include technical assistance and administrative tasks.

Cameron Newell (The Xerces Society for Invertebrate Conservation)	
Summary of Comments	CDFA Response to Comments
Is the amount available for direct and indirect costs adjusted based on total funding amount?	CDFA will cap technical assistance costs (including indirect) at \$360,000 (18%) for a \$2 M award and would proportionally reduce the cap if the grant award is smaller than \$2 M. This budget for technical assistance is aligned with the awards for other CDFA technical assistance programs. For example, the Climate Smart Agriculture Technical Assistance Program allows for a maximum of \$60,000 per CDFA program supported per funding appropriation for technical assistance costs. Clarifying language will be provided in the RGA.
Do partner agricultural commodity groups need to be based in CA?	The primary applicant needs to have a California address.
Outcome monitoring is not clear. What are people monitoring for? Habitat establishment? Pollinator populations?	Awardees will work with CDFA to propose metrics for tracking success of projects, which will include habitat establishment. CDFA intends for outcome monitoring plans to be flexible.
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?	CDFA will clarify this in the RGA.
References to IPM are vague and confusing.	CDFA will clarify this in the RGA.
There's a vague reference to Comet-planner. How does this fit into overall project?	Comet-Planner is an online calculator tool developed to support the HSP program. CDFA is interested in quantifying climate benefits from PHP project in support of CDFA's broader climate change policy and in recognition of the importance of natural and working land in meeting California's goals related to climate change. The Comet-Planner tool involves few inputs and should be easily completed by Recipients. Clarifying language will be provided in the RGA regarding this requirement.

Cameron Newell (The Xerces Society for Invertebrate Conservation)	
Summary of Comments	CDFA Response to Comments
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.	It's important for state funding accountability that outcomes are tracked. CDFA will provide flexibility for outcome monitoring plans and acknowledges that these could require significant match.
Clarification on payment rate and implementation rates – see comment letter for detail.	CDFA intends to balance ease of application with alignment of NRCS requirements.

Kelly Rourke and Laurie Davies Adams (Pollinator Partnership)	
Summary of Comments	CDFA Response to Comments
Would like consideration of more favorable cost-share arrangements for the SDFR community.	To align with CDFA's existing programs SDFR individuals are prioritized for assistance through the scoring criteria. SDFR individuals will not receive a higher payment rate for the practices.
Appreciate the mandate to use native plants "where feasible".	Thank you for your feedback.
Would like the length of the grant to be increased to 4 years.	CDFA will support a grant term as long as possible based upon encumbrance and liquidation deadlines. Adequate time is necessary for program development, application period, grant execution, and project implementation.
Would like bullet one in "Program Requirements and Restrictions" to 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."	This will be reflected in the next version of the RGA.
Would like the criteria to be disclosed for the Scientific Teams, which have the authority to review the applications and the progress reports. Would like clarity about the eligibility of these individuals and their organizations to apply for the grants.	The reviewers are from California state agencies and/or federal partners. They will not be eligible to receive funding through the PHP. PHP scientific staff will receive and review progress reports as part of the grant administration.

Scott Gardner (California Department of Fish and Wildlife)	
Summary of Comments	CDFA Response to Comments
Would like the NRCS practices in the program to be expanded to the full set of practices included in "Using 2014 Farm Bill Programs for Pollinator Conservation".	CDFA will evaluate additional practices from the USDA Biology Technical Note "Using 2014 Farm Bill Programs for Pollinator Conservation" for inclusion.
Would like CDFA to solicit input from growers to determine if the NRCS-set rates are sufficient.	CDFA provides opportunity for public feedback on the program framework and draft request for grant applications through the public comment opportunity and through the public meetings of the Environmental Farming Act Science Advisory Panel. Additional opportunities to provide input may be scheduled and will be announced through a CDFA news release. Information will be posted on the program website. Please consider signing up for email notifications to be made aware of public input opportunities.
Would like that CDFA add all completed habitat projects into the WAFWA Crucial Habitat Assessment Tool (CHAT), which is a centralized online tracking software program that anonymizes location to protect private landowners.	CDFA will coordinate with CDFW to utilize this tool. Language will be added to the RGA to ensure that applicants and recipients are aware of this.
Would like the BMPs from the California's Managed Pollinator Protection Plan to be incorporated into grant-funded projects to protect native crop pollinators.	Language in the RGA will be changed to include guidance to follow the BMPs from the California's Managed Pollinator Protection Plan.
Would like NRCS conservation practice 595 Integrated Pest Management as an eligible practice in the PHP.	NRCS CPS 595 will be included as an eligible practice for funding and CDFA will evaluate additional practices from the USDA Biology Technical Note "Using 2014 Farm Bill Programs for Pollinator Conservation" for inclusion.
Would like additional priority for projects which are in areas with identified corridors that have been recently modeled.	As the workplan merit and feasibility scoring criterion is developed, there will be a consideration for whether a project will focus on implementing habitat within a modeled corridor. CDFA will coordinate appropriate language for the RGA with CDFW.

Aubrey Bettencourt (Almond Alliance of California)

Summary of Comments	CDFA Response to Comments
Would like 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.	CDFA must balance providing assistance directly to farmers and ranchers with administrative demands within CDFA. Technical assistance is a critical component of the Pollinator Habitat Program and for that reason and for administrative logistics related to costs and timelines, providing grants to qualified organizations to work with farmers and ranchers is most feasible.
Would like grants to last at least 48 months.	CDFA will support a grant term as long as possible based upon encumbrance and liquidation deadlines. Adequate time is necessary for program development, application period, grant execution and project implementation.
Would like a higher cap than \$1,000,000 per project.	The award cap will be raised to a maximum of \$ 2 million.
Would like clarifying language to ensure non-profits who purchase agricultural land and who plan to transition it out of agricultural production are not eligible for the award.	Non-profits will describe how their mission and qualifications align with the goals of the Pollinator Habitat Program. This will be considered in technical review of applications through the scoring criteria related to qualifications. Land acquisition is not an allowable cost for recipients of this funding.
Would like clarification that any agricultural non-profit be eligible to receive a grant award if they meet the requirements outlined in this program.	Non-profits will describe how their mission and qualifications align with the goals of the Pollinator Habitat Program. This will be considered in technical review of applications through the scoring criteria related to qualifications.
When will CDFA provide clarity and specific dates on the program application activity timeline.	Following finalization of the Request for Grant Applications, CDFA will post a timeline on the program website to indicate the anticipated application period and grant implementation period.
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?	CDFA is working on a timeline based upon feedback and administrative processes. When the Request for Grant Applications is finalized, a timeline will be posted on the program website.
Would like clarification on fees vs charging for administering vs providing technical assistance.	The grantee cannot charge a fee to the rancher or farmer for the technical assistance the grantee performs for the rancher or farmer. However, the cost of the technical assistance can be reimbursed by the PHP. Technical assistance costs (including awardee indirect) will be allowable for up to 18% of the total grant award.

Aubrey Bettencourt (Almond Alliance of California)	
Summary of Comments	CDFA Response to Comments
<p>Would like a cap on the amount of funds to the grant recipient for administration and technical assistance, versus the amount to reimburse farmers. Would like to ensure that the majority of the funds are being spent on pollinator habitat and forage.</p>	<p>CDFA will cap technical assistance costs (including indirect) at \$360,000 (18%) for a \$2 M award and would proportionally reduce the cap if the grant award is smaller than \$2 M. This budget for technical assistance is aligned with the awards for other CDFA technical assistance programs. For example, the Climate Smart Agriculture Technical Assistance Program allows for a maximum of \$60,000 per CDFA program supported per funding appropriation for technical assistance costs. Clarifying language will be provided in the RGA.</p>
<p>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?</p>	<p>The language that provides emphasis to farms and ranches of 500 acres will be removed. The program's equity goals will be focused on supporting on-farm projects for Socially Disadvantaged Farmers and Ranchers through points provided in the technical review criteria.</p>
<p>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.</p>	<p>BIMPOC individuals are not eligible entities. CDFA will encourage applications from organizations that support BIMPOC. Clarifying language will be included in the RGA.</p>
<p>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.</p>	<p>Some farmers and ranchers who wish to participate through partnership with a Recipient may pursue other funding sources and PHP Recipient organizations may provide assistance to farmers and ranchers in pursuing or coordinating funding sources. PHP Recipients will develop an Outcome Monitoring Plan that will identify metrics to be monitored and reported to CDFA for three years following the end of the grant agreement. Execution of the monitoring plan in years 1-3 after the end of the grant term will be considered cost share provided by the Recipient.</p>

Aubrey Bettencourt (Almond Alliance of California)	
Summary of Comments	CDFA Response to Comments
<p>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?</p>	<p>CDFA will provide greater detail on this in the RGA. It will include language that presentation and outreach materials related to IPM must be submitted to CDFA.</p>
<p>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.</p>	<p>The development of an Outcome Monitoring Plan will be required by each recipient organization and will be funded through the technical assistance portion of the budget. CDFA will provide minimum requirements regarding Outcome Monitoring Plans in the Request for Grant Applications. The Outcome Monitoring Plan will identify metrics to be monitored and reported to CDFA for three years following the end of the grant agreement. Execution of the monitoring plan in years 1-3 after the end of the grant term will be considered cost share provided by the Recipient.</p>
<p>“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?</p>	<p>The reviewers are from California state agencies and/or federal partners. The Request for Grant Applications will be updated to reflect this.</p>

Aubrey Bettencourt (Almond Alliance of California)	
Summary of Comments	CDFA Response to Comments
<p>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.</p>	<p>CDFA will cap technical assistance costs (including indirect) at \$360,000 (18%) for a \$2 M award and would proportionally reduce the cap if the grant award is smaller than \$2 M. This budget for technical assistance is aligned with the awards for other CDFA technical assistance programs. For example, the Climate Smart Agriculture Technical Assistance Program allows for a maximum of \$60,000 per CDFA program supported per funding appropriation for technical assistance costs. Clarifying language will be provided in the RGA.</p>
<p>Would like there to be language added to the "Supplies" section to include "seed development" or "seed production."</p>	<p>The PHP program will provide funding for certain NRCS practices at two times the NRCS payment rate. Clarifying language will be provided in the RGA. These amounts will cover the cost of seed and nursery plants, but the budget will not be itemized to show costs of practice implementation supplies.</p>
<p>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.</p>	<p>Yes, applying compost is different than creating pollinator habitat; however, both require the grantee to work with the government agency in terms of providing timely deliverables such as listed in the RGA. In evaluating past performance, CDFA may consider history of timely invoicing and reporting, communicativeness of awardees, and project performance.</p>

Aubrey Bettencourt (Almond Alliance of California)	
Summary of Comments	CDFA Response to Comments
<p>"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.</p>	<p>Recipients may request 25% of the grant as an advance payment. This advance may be used for any aspect of the project.</p>
<p>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?</p>	<p>Recipients may request 25% of the grant as an advance payment. This advance may be used for any aspect of the project.</p>
<p>"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 they were selected for this role? Additionally, what are the criteria to be a part of the scientific team and how long will they serve?</p>	<p>The PHP scientific team include Senior Environmental Scientist/Environmental Scientists employed by the California Department of Food and Agriculture.</p>

Aubrey Bettencourt (Almond Alliance of California)	
Summary of Comments	CDFA Response to Comments
<p>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.</p>	<p>Comet-Planner is an online calculator tool developed to support the HSP program. CDFA is interested in quantifying climate benefits from PHP project in support of CDFA's broader climate change policy and in recognition of the importance of natural and working land in meeting California's goals related to climate change. The Comet-Planner tool involves few inputs and should be easily completed by Recipients. Clarifying language will be provided in the RGA regarding this requirement. In addition, clarifying language will be included regarding the minimum requirement for Integrated Pest Management training that must be provided by Recipients to farmer and rancher participants.</p>

Aubrey Bettencourt (Almond Alliance of California)	
Summary of Comments	CDFA Response to Comments
<p>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.</p>	<p>The program is not requiring solely native plants, despite there being a preference for native plants. Clarifying language will be included. The language of SB 170 (Budget Act of 2021) that provided this appropriation of funding to the Pollinator Habitat Program indicated that native plants and native biodiversity should be prioritized in the program. https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220SB170#:~:text=SB%20170%2C%20Skinner.,appropriation%20and%20making%20other%20changes</p>