

Summary of Public Comments and Response
 Conservation Agriculture Planning Grants Program – December 2021

Organization/Entity	Summary of Comments	Response to Comment
Yurok Tribe	<ol style="list-style-type: none"> 1. Clarify whether non-timber forest products (such as acorns) would be considered an eligible cropping system. If this was the case, this would provide opportunity for culturally relevant traditional food to be included. 2. Allow federally negotiated indirect cost rates. 3. Set aside some funding to be used by Tribes to pursue training for tribal employees so that they could become eligible for the CAPGP funding in future rounds. 4. CDFA should be inclusive of traditional ecological knowledge and experience when evaluating qualifications for grant funding. 5. Supports the prioritization of 25% of funds to assist Socially Disadvantaged Farmers and Ranchers and farms 500 acres or less. 6. Supports the provision of 25% advanced payments. 	<ol style="list-style-type: none"> 1. Culturally relevant traditional foods can be included in planning grants. 2. A general indirect rate of 20% has been established for applicants to the CDFA Conservation Agriculture Planning Grant Program. 3. CDFA will evaluate further request for training. 4. CDFA will consider traditional ecological knowledge and experience when evaluating planning grant proposals that align with the expertise.
FWE Sustainable Resource Solutions	Anaerobic digester developers should be considered eligible applicants.	CDFA does not have information regarding the planning qualifications of dairy digester developer businesses. Individuals employed in the anaerobic digester industry may be eligible for planning grants if they are listed as a Technical Service Provider (TSP) by USDA NRCS or if they meet the requirements for eligible entities/individuals.

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<p>American Farmland Trust</p>	<ol style="list-style-type: none"> 1. Within the Background of the Request for Grant Applications, indicate that water availability is a climate change impact. 2. Add Groundwater Sustainability Agencies and local agencies and eligible entities. 3. Prioritize projects that address water use and help farmers that are at risk of following due to water shortage in areas identified by DWR as high and medium priority basins. 4. Award a groundwater related project in each high priority basin (as identified by DWR) and prioritize grant proposals in medium priority basins. 	<ol style="list-style-type: none"> 1. CDFA will clarify that uncertainty and stressed water supply are impacts of climate change by adding the following language, "CSA addresses risks that climate changes poses to agriculture, including drought and uncertain water availability". 2. CDFA will add GSAs to the list of eligible entities. 3. Due to the many competing priorities created by climate change impacts, CDFA will award projects based upon the minimum qualification criteria and will not place additional priority upon certain plans or geographies with exception for organic transition plans for which \$7 M has been specified in statutory budget language for organic transition plans. Several other CDFA OEFI incentive programs place emphasis on water supply and adaptation to water supply impacts including the SWEEP and WETA programs. 4. The CAPGP is intended to be broad in the types of plans that are supported. Water specific programs such as SWEEP and WETA are available to address water efficiency and water conservation. SWEEP gives additional consideration to projects that reduce pumping from critically over-drafted groundwater basins.

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<p>Madera County Department of Water and Natural Resources</p>	<ol style="list-style-type: none"> 1. Within the Background of the Request for Grant Applications, indicate that water availability is a climate change impact. 2. Add Groundwater Sustainability Agencies and local agencies and eligible entities. 3. Prioritize projects that address water use and help farmers that are at risk of following due to water shortage in areas identified by DWR as high and medium priority basins. 4. Award a groundwater related project in each high priority basin (as identified by DWR) and prioritize grant proposals in medium priority basins. 	<ol style="list-style-type: none"> 1. CDFA will clarify that uncertainty and stressed water supply are impacts of climate change by adding the following language, "CSA addresses risks that climate changes poses to agriculture, including drought and uncertain water availability". 2. CDFA will add GSAs to the list of eligible entities. 3. Due to the many competing priorities created by climate change impacts, CDFA will award projects based upon the minimum qualification criteria and will not place additional priority upon certain plans or geographies with exception for organic transition plans for which \$7 M has been specified in statutory budget language for organic transition plans. Several other CDFA OEFI incentive programs place emphasis on water supply and adaptation to water supply impacts including the SWEEP and WETA programs. 4. The CAPGP is intended to be broad in the types of plans that are supported. Water specific programs such as SWEEP and WETA are available to address water efficiency and water conservation. SWEEP gives additional consideration to projects that reduce pumping from critically over-drafted groundwater basins.

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Caribou Biofuels	CDFA should work with the California Air Resources Board to develop a certification program that grades biochar for sequestration potential, rewarding innovation for sustained food security, habitat, and lasting, nature-based solutions.	This comment is out of the scope of the CAPGP draft RGA

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<p>Roots of Change</p>	<ol style="list-style-type: none"> 1. Within the Background of the Request for Grant Applications, indicate that water availability is a climate change impact. 2. Add Groundwater Sustainability Agencies and local agencies and eligible entities. 3. Prioritize projects that address water use and help farmers that are at risk of following due to water shortage in areas identified by DWR as high and medium priority basins. 4. Award a groundwater related project in each high priority basin (as identified by DWR) and prioritize grant proposals in medium priority basins. 	<ol style="list-style-type: none"> 1. CDFA will clarify that uncertainty and stressed water supply are impacts of climate change by adding the following language, "CSA addresses risks that climate changes poses to agriculture, including drought and uncertain water availability". 2. CDFA will add GSAs to the list of eligible entities. 3. Due to the many competing priorities created by climate change impacts, CDFA will award projects based upon the minimum qualification criteria and will not place additional priority upon certain plans or geographies with exception for organic transition plans for which \$7 M has been specified in statutory budget language for organic transition plans. Several other CDFA OEFI incentive programs place emphasis on water supply and adaptation to water supply impacts including the SWEEP and WETA programs. 4. The CAPGP is intended to be broad in the types of plans that are supported. Water specific programs such as SWEEP and WETA are available to address water efficiency and water conservation. SWEEP gives additional consideration to projects that reduce pumping from critically over-drafted groundwater basins.

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Audubon California	Include United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Fish and Wildlife Habitat Plans (PAC 142) as a plan eligible for funding through the Conservation Agriculture Planning Grant Program.	CDFA is evaluating the inclusion of the Fish and Wildlife Plan for funding in CAPGP.
California Certified Organic Farmers (CCOF) and Agriculture and Land-Based Training Association (ALBA)	<ol style="list-style-type: none"> 1. Clarify if a stand-alone organic system plan is eligible for funding through the program. 2. Create an organic transition program with the \$7 million including the 2021-2022 state budget for organic transition. The organic transition program should include: <ol style="list-style-type: none"> a) Grants to farmers and ranchers for implementation of practices that build soils and biologically manage pests while offsetting the economic risk of transitioning to organic production. b) Mentorship of transitioning farmers and ranchers by experienced organic producers. Mentors should be compensated for their time. c) Research, education, and technical assistance grants to build capacity of technical assistance providers to support organic transition with resources that are culturally and linguistically appropriate. d) Regional food system grants that expand local markets for organically produced food, creating opportunities for new and existing organic producers. 3. CDFA should consider ways to support secure land tenure. 	<ol style="list-style-type: none"> 1. CDFA has clarified that the Organic Systems Plan is eligible under CAP 138 and a stand-alone organic transition plan will be allowed. 2. CAPGP is designed to fund planning activities only. The \$7 million will be reserved for funding CAP 138 and Organic System Plans. 3. Land tenure is out of the scope of the CAPGP program.

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<p>Assemblymember Carlos Villapudua (13th District)</p>	<ol style="list-style-type: none"> 1. Within the Background of the Request for Grant Applications, indicate that water availability is a climate change impact. 2. Add Groundwater Sustainability Agencies and local agencies and eligible entities. 3. Prioritize projects that address water use and help farmers that are at risk of following due to water shortage in areas identified by DWR as high and medium priority basins. 4. Award a groundwater related project in each high priority basin (as identified by DWR) and prioritize grant proposals in medium priority basins. 	<ol style="list-style-type: none"> 1. CDFA will clarify that uncertainty and stressed water supply are impacts of climate change by adding the following language, "CSA addresses risks that climate changes poses to agriculture, including drought and uncertain water availability". 2. CDFA will add GSAs to the list of eligible entities. 3. Due to the many competing priorities created by climate change impacts, CDFA will award projects based upon the minimum qualification criteria and will not place additional priority upon certain plans or geographies with exception for organic transition plans for which \$7 M has been specified in statutory budget language for organic transition plans. Several other CDFA OEFI incentive programs place emphasis on water supply and adaptation to water supply impacts including the SWEEP and WETA programs. 4. The CAPGP is intended to be broad in the types of plans that are supported. Water specific programs such as SWEEP and WETA are available to address water efficiency and water conservation. SWEEP gives additional consideration to projects that reduce pumping from critically over-drafted groundwater basins.

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<p>Natural Resources Defense Council</p>	<ol style="list-style-type: none"> 1. Explain how CDFA determined which plans would get funded through CAPGP and justify determinations in a climate context. 2. Include water efficiency and water conservation as a climate adaptation strategy in the background. 3. Include funding for conservation plans that increase riparian buffer reforestation and riparian herbaceous cover. 4. Prioritize funding for TAPs who develop comprehensive farm plans for growers in areas that maximize soil carbon sequestration, biodiversity protections, and water conservation. 5. Add State Conservancies to the list of eligible entities in CAPGP. 6. Create a separate organic transition program instead of including organic assistance through CAPGP. 7. Provide clarity that CAPGP funds will be administered through a competitive grant process instead of a first-come, first-served process. 	<ol style="list-style-type: none"> 1. The plans that were selected for inclusion in CAPGP have a relationship with or support the activities that can be funded through the incentive programs administered by the Office of Environmental Farming and Innovation. 2. CDFA will clarify that uncertainly and stressed water supply is an impact of climate change. 3. The NRCS practices of riparian buffer and riparian herbaceous cover may be included in some of the plans that have been proposed for inclusion in CAPGP including Carbon Farm Plans and Pollinator Habitat Plans. 4. Due to the many competing priorities created by climate change impacts, CDFA will award projects based upon the minimum qualification criteria and will not place additional priority upon certain plans or geographies with exception for organic transition plans for which \$7 M has been specified in statutory budget language for organic transition plans. Several other CDFA OEFI incentive programs place emphasis on water supply and adaptation to water supply impacts including the SWEEP and WETA programs. 5. State Conservancies are state agencies and are not eligible. Non-profits that work closely with State Conservancies may be eligible if they demonstrate qualifications. 6. CDFA CAPGP will fund CAP 138 and organic transition plans. CAPGP is not
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		<p>designed to fund organic transition activities.</p> <p>7. The CAPGP program will be administered as a first-come, first-serve program with criteria for minimum qualifications.</p>
<p>Association of California Water Agencies</p>	<ol style="list-style-type: none"> 1. Add Groundwater Sustainability Agencies (GSA) and local agencies and eligible entities. 2. Prioritize projects that address water use and help farmers that are at risk of falling due to water shortage in areas identified by DWR as high and medium priority basins. 3. Within the Background of the Request for Grant Applications, indicate that water availability is a climate change impact. 	<ol style="list-style-type: none"> 1. CDFA will add GSAs to the list of eligible entities. 2. The CAPGP is intended to be broad in the types of plans that are supported. Water specific programs such as SWEEP and WETA are available to address water efficiency and water conservation. SWEEP gives additional consideration to projects that reduce pumping from critically over-drafted groundwater basins. 3. CDFA will clarify that uncertainty and stressed water supply are impacts of climate change by adding the following language, "CSA addresses risks that climate changes poses to agriculture, including drought and uncertain water availability".

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<p>California Apple Commission</p>	<ol style="list-style-type: none"> 1. Clarify if a stand-alone organic system plan is eligible for funding through the program. 2. Create an organic transition program with the \$7 million including the 2021-2022 state budget for organic transition. The organic transition program should include: <ol style="list-style-type: none"> a) Grants to farmers and ranchers for implementation of practices that build soils and biologically manage pests while offsetting the economic risk of transitioning to organic production. b) Mentorship of transitioning farmers and ranchers by experienced organic producers. Mentors should be compensated for their time. c) Research, education, and technical assistance grants to build capacity of technical assistance providers to support organic transition with resources that are culturally and linguistically appropriate. d) Regional food system grants that expand local markets for organically produced food, creating opportunities for new and existing organic producers. 	<ol style="list-style-type: none"> 1. CDFA has clarified that the Organic Systems Plan is eligible under CAP 138 and a stand-alone organic transition plan will be allowed. 2. CAPGP is designed to fund planning activities only. The \$7 million will be reserved for funding CAP 138 and Organic System Plans.

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<p>California Blueberry Commission</p>	<ol style="list-style-type: none"> 1. Clarify if a stand-alone organic system plan is eligible for funding through the program. 2. Create an organic transition program with the \$7 million including the 2021-2022 state budget for organic transition. The organic transition program should include: <ol style="list-style-type: none"> a) Grants to farmers and ranchers for implementation of practices that build soils and biologically manage pests while offsetting the economic risk of transitioning to organic production. b) Mentorship of transitioning farmers and ranchers by experienced organic producers. Mentors should be compensated for their time. c) Research, education, and technical assistance grants to build capacity of technical assistance providers to support organic transition with resources that are culturally and linguistically appropriate. d) Regional food system grants that expand local markets for organically produced food, creating opportunities for new and existing organic producers. 	<ol style="list-style-type: none"> 1. CDFA has clarified that the Organic Systems Plan is eligible under CAP 138 and a stand-alone organic transition plan will be allowed. 2. CAPGP is designed to fund planning activities only. The \$7 million will be reserved for funding CAP 138 and Organic System Plans.

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<p>California Wild Rice Advisory Board</p>	<ol style="list-style-type: none"> 1. Clarify if a stand-alone organic system plan is eligible for funding through the program. 2. Create an organic transition program with the \$7 million including the 2021-2022 state budget for organic transition. The organic transition program should include: <ol style="list-style-type: none"> a) Grants to farmers and ranchers for implementation of practices that build soils and biologically manage pests while offsetting the economic risk of transitioning to organic production. b) Mentorship of transitioning farmers and ranchers by experienced organic producers. Mentors should be compensated for their time. c) Research, education, and technical assistance grants to build capacity of technical assistance providers to support organic transition with resources that are culturally and linguistically appropriate. d) Regional food system grants that expand local markets for organically produced food, creating opportunities for new and existing organic producers. 	<ol style="list-style-type: none"> 1. CDFA has clarified that the Organic Systems Plan is eligible under CAP 138 and a stand-alone organic transition plan will be allowed. 2. CAPGP is designed to fund planning activities only. The \$7 million will be reserved for funding CAP 138 and Organic System Plans.

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<p>Olive Growers Council of California</p>	<ol style="list-style-type: none"> 1. Clarify if a stand-alone organic system plan is eligible for funding through the program. 2. Create an organic transition program with the \$7 million including the 2021-2022 state budget for organic transition. The organic transition program should include: <ol style="list-style-type: none"> a) Grants to farmers and ranchers for implementation of practices that build soils and biologically manage pests while offsetting the economic risk of transitioning to organic production. b) Mentorship of transitioning farmers and ranchers by experienced organic producers. Mentors should be compensated for their time. c) Research, education, and technical assistance grants to build capacity of technical assistance providers to support organic transition with resources that are culturally and linguistically appropriate. d) Regional food system grants that expand local markets for organically produced food, creating opportunities for new and existing organic producers. 	<ol style="list-style-type: none"> 1. CDFA has clarified that the Organic Systems Plan is eligible under CAP 138 and a stand-alone organic transition plan will be allowed. 2. CAPGP is designed to fund planning activities only. The \$7 million will be reserved for funding CAP 138 and Organic System Plans.

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<p>Pesticide Action Network and Californians for Pesticide Reform</p>	<ol style="list-style-type: none"> 1. Move beyond plans to action/implementation; add IPM strategies to Healthy Soils Program instead of CAPGP 2. Consider creating a research, education, and technical assistance grant program to assess needs of producers and provide technical assistance and research for producers transitioning to organic and IPM practices that reduce pesticide use. 3. Create a standalone organic transition program that includes: <ol style="list-style-type: none"> a) Grants to farmers and ranchers for implementation of practices that build soils and biologically manage pests while offsetting the economic risk of transitioning to organic production. b) Mentorship of transitioning farmers and ranchers by experienced organic producers. c) Research, education, and technical assistance grants to build capacity of technical assistance providers to support organic transition with resources that are culturally and linguistically appropriate. d) Regional food system grants that expand local markets for organically produced food, creating opportunities for new and existing organic producers. 	<ol style="list-style-type: none"> 1. The Healthy Soils Program has an established process for inclusion of new practices. The CAPGP program is created to provide funding for planning activities. 2. This is out of the scope of the CAPGP program 3. CDFA CAPGP is designed to only fund planning activities. The \$7 million will be reserved for funding CAP 138 or Organic System Plans.

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California Association of Resource Conservation Districts	<ol style="list-style-type: none"> 1. Allow higher indirect rates on a case-by-case basis rather than having a 20% cap for all. 2. Allow for reimbursement of actual costs, rather than using standard payment rates. 3. Remove or revise Critical Project Review Requirements. 4. Make administrative costs related to project management, tracking of budget and deliverables, and regular invoicing and reporting an allowable expense. 5. Have applications be accepted on a rolling basis. 6. Withholding 10% can be onerous for small entities. 	<ol style="list-style-type: none"> 1. A general indirect rate of 20% has been established for applicants to the CDFA Conservation Agriculture Planning Grant Program. 2. A cost payment structure for this planning program is aligned with USDA NRCS and supports the administration of the program within CDFA. An itemized budget will require increased administrative capacity within OEFI and will burden participants with additional reporting and substantiation of cost. 3. CDFA will retain the requirements outlined in the draft RGA regarding Critical Project Review. This language is aligned with critical project review requirements across OEFI programs. 4. Administrative costs may be included in indirect costs. 5. Applications will be accepted on a first-come, first-served (rolling) basis and awarded based upon meeting minimum qualifications. 6. CDFA withholds 10% of the award until project completion is verified in all of OEFI's programs. In the case of CAPGP, the awardee will provide all deliverables (plans) and a final report will be approved before the 10% is released. This withhold ensure a minimum level of governmental accountability for the funds dispersed.