

Response to comments on the first draft of the Sustainable California Grown Cannabis RGA, released March 14, 2022

Organization	Comment Summary	Department Response
Hawthorne Gardening Co/Scotts Miracle-Gro	<ul style="list-style-type: none"> Expand the SCGC pilot study to include all forms of production, indoor and outdoor, greenhouse, and across the universe of operators, both legacy and non-legacy." 	<ul style="list-style-type: none"> The Department maintains that only eligible licensed outdoor cannabis cultivators will be allowed to participate in this study. CDFA has revised the RGA to specify which specific license types are eligible for participation. Both licensed legacy and non-legacy outdoor cultivators are eligible to apply. Prioritization will be given to projects which partner with legacy growers as specified in the RGA. The Department has added clarification in the RGA as to the definition of a legacy cultivator for the purposes of qualification in this pilot program.
	<ul style="list-style-type: none"> Include a review of out of state operators/operations as they may shed additional light and information based on their own unique experiences. It is important that California understands how its tax-paying producers compare to producers located in other states on issues that drive their cost structures, including water and energy usage. 	<ul style="list-style-type: none"> The Department maintains that only eligible cultivators located within the State will be allowed to participate in the SCGC pilot study. However, practices and research conducted on sustainable practices in other states may be used to inform the final best management practices manual so long as those activities are not funded with any of the SCGC grant funds.
Resource Innovation Institute	<ul style="list-style-type: none"> Include indoor, greenhouse, non-legacy and out-of-state cannabis cultivation operations. 	<ul style="list-style-type: none"> The Department maintains that only eligible licensed outdoor cannabis cultivators will be allowed to participate in this study. CDFA has revised the RGA to specify which specific license types are eligible for participation.
Good Farmers Great Neighbors	<ul style="list-style-type: none"> The pilot study should seek to establish participation from geographical diversity within the state. 	<ul style="list-style-type: none"> CDFA is modifying the RGA to include all eligible licensed cultivators throughout the state to increase the range of geographic diversity.
Grodan	<ul style="list-style-type: none"> Include all types of cannabis cultivators – indoor, greenhouse, outdoor. 	<ul style="list-style-type: none"> The Department maintains that only eligible licensed outdoor cannabis cultivators will be allowed to participate in this study. CDFA has revised the RGA to specify which specific license types are eligible for participation.

<p>Hessel Farmers Grange</p>	<ul style="list-style-type: none"> The comment period should be extended because farmers are busy in the spring. Further, CDFA should add more listening sessions and roundtables to the process. These listening sessions should be promoted using grant funds. 	<ul style="list-style-type: none"> CDFA has added an additional workshop and comment period. Further, the Department has delayed the application process until the end of the 2022 harvest to allow for additional outreach and program development.
	<ul style="list-style-type: none"> Grants should be funded on an award basis and not on a reimbursement basis. 	<ul style="list-style-type: none"> CDFA has added language regarding information on how grant awardees may request advance payment.
<p>California Certified Organic Farmers</p>	<ul style="list-style-type: none"> Recommends that CDFA prioritize research on equivalent-to-organic cannabis production systems as this will meet project goals and increase the sustainability of California cannabis. Further, CDFA should offer the OCal standards as a resource in the request for grant applications will provide applicants with a convenient reference to many sustainable cannabis production practices. 	<ul style="list-style-type: none"> The Department acknowledges these comments and will aim to collaborate with the OCal program in the future. At this time, the Department will not prioritize applications with any specific practices in order to increase the range of potential practices studied.
<p>Origins Council</p>	<ul style="list-style-type: none"> Encourages that the timeline be extended significantly, to push the opening of applications until after the end of harvest at the earliest. 	<ul style="list-style-type: none"> CDFA has added an additional workshop and comment period. Further, the Department has delayed the application process until the end of the 2022 harvest to allow for additional outreach and program development.
	<ul style="list-style-type: none"> Recommends modification to language in draft RGA to read: "Identify, test, and promote environmentally friendly BMPs to encourage best practices in outdoor cannabis cultivation." 	<ul style="list-style-type: none"> CDFA has accepted the comment regarding language around the environmental impacts of outdoor farming and has modified the RGA to reflect the proposed language: "Identify, test, and promote environmentally friendly BMPs to encourage best practices in outdoor cannabis cultivation."
	<ul style="list-style-type: none"> Recommends inclusion of the mixed-light tier 1 license type in the list of eligible cultivator participants. 	<ul style="list-style-type: none"> The modified RGA now includes clarification as to which licenses are eligible to participate in the program. Mixed-light tier 1 is included.
	<ul style="list-style-type: none"> Recommends splitting funds by the proportion of independent cultivators or total acreage farmed in the regions. 	<ul style="list-style-type: none"> The modified RGA now includes more clarity as to how the grant funds will be allocated. Specifically, grant funds will be allocated on a project level rather than on a regional basis. There is no set requirement for specific regions to receive a specific allocation of funding based on the proportion of cultivators. Instead, funds will be allocated on the quality of application proposal and the characteristic of partnering cultivators.
	<ul style="list-style-type: none"> Recommends group Sonoma County into the northern region. 	<ul style="list-style-type: none"> CDFA is modifying the RGA to include all licensed cultivators throughout the state to increase the range of geographic diversity and is removing its definition of regions.

	<ul style="list-style-type: none">• Recommends that an additional deliverable for the program should be a report on regulatory barriers to adopting best management practices.	<ul style="list-style-type: none">○ CDFA will welcomes grant awardees to report on the regulatory barriers to adopting best management practices however this will not be a requirement to the reporting process.
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Response to comments on the second draft of the Sustainable California Grown Cannabis RGA, released July 8, 2022

Organization	Comment Summary	Department Response
Origins Council	<ul style="list-style-type: none"> • Supports the modification of language in the program objectives stating the program aims to, “identify, test, and promote BMPs which encourage environmentally sustainable practices in outdoor cannabis cultivation.” 	<ul style="list-style-type: none"> ○ The Department acknowledges this comment, no modifications are necessary.
	<ul style="list-style-type: none"> • Supports the inclusion of mixed-light tier 1 in the criteria of eligible licensed cannabis cultivators which may participate in the study. 	<ul style="list-style-type: none"> ○ The Department acknowledges this comment, no modifications are necessary.
	<ul style="list-style-type: none"> • Supports the modifications to enable advance payments to lead applicants. 	<ul style="list-style-type: none"> ○ The Department acknowledges this comment, no modifications are necessary.
	<ul style="list-style-type: none"> • Requests additional clarification as to how CDFA will prioritize funding based on socially disadvantaged cultivators, farm size, and legacy outdoor cultivation. 	<ul style="list-style-type: none"> ○ CDFA modified the scoring criteria to include the question, “does the proposed funding allocation promote inclusivity of socially disadvantaged groups, priority populations, and/or cannabis equity businesses?” to address how the Department will factor partnerships with the aforementioned groups. Further, the last question in the scoring criteria under “Workplan” addresses how farm size will be incorporated into the scoring of grant applications.
	<ul style="list-style-type: none"> • Requests that the definition of a small farm for the purposes of this program not be based on the number of licenses held but rather on the total cultivated acreage of the farm. 	<ul style="list-style-type: none"> ○ CDFA changed the definition of a small farm for the purposes of this program to be limited to a total cannabis canopy of 1 acre as opposed to holding a single license. This will allow greater flexibility for applicants to partner with a diverse set of small farms.
	<ul style="list-style-type: none"> • Requests additional clarification regarding the requirement that 25% of funding be allocated to socially disadvantaged communities, priority populations, and equity businesses and what the 25% should be based on. 	<ul style="list-style-type: none"> ○ CDFA removed the requirement that 25% of funding be allocated to socially disadvantaged communities, priority populations, and equity businesses. This will allow applicants to determine how best to allocate funding toward cultivator participation. Further, the scoring criteria is structured to give priority to applicants who partner with socially disadvantaged communities, priority populations, and cannabis equity business.
	<ul style="list-style-type: none"> • Requests additional clarification on how partnership with socially disadvantaged cultivators will factor into project selections. 	<ul style="list-style-type: none"> ○ CDFA modified the scoring criteria to include the question, “does the proposed funding allocation promote inclusivity of socially disadvantaged groups, priority populations, and/or cannabis equity businesses?” to address

		<p>how the Department will factor partnerships with the aforementioned groups.</p>
	<ul style="list-style-type: none"> • Recommends that cultivators be considered “cannabis equity businesses” for purposes of the SCGC Pilot Study based on equity qualification at either a state or local level. 	<ul style="list-style-type: none"> ○ CDFA has modified the language in the RGA to accept the recommendation that cultivators be considered cannabis equity businesses for the purpose of this grant program based on equity qualification at either a state or local level.
	<ul style="list-style-type: none"> • Request that CDFA consider removing the requirement that projects must involve a reduction in pollutants/fossil fuels in order to be considered “priority populations.” 	<ul style="list-style-type: none"> ○ No modifications were made to address the comment regarding removing the requirement that projects require a reduction in on-site pollutant emissions to be considered a benefit to priority populations. CDFA cannot accommodate this comment at this time as no formal quantification methods exist to quantify benefits to priority populations specific to this project other than a reduction in baseline GHG emissions. The language as proposed in the RGA provides the most structure for defining benefits to priority populations until a more robust measure is in place.