

Comment 1.

We urge CDFA to add supplemental bonus points (e.g., +10 points) for applicants who can document that they implemented measurable response actions to contain an infestation before the solicitation date. Add a supplemental bonus (+10 points) for documented early-action invasive species control taken before the grant solicitation date.

Response 1.

Additional points will not be added, but applicants are encouraged to include information on implemented measurable response actions to contain an infestation and/or documented early-action invasive species control before the solicitation date in the project narrative for consideration.

Comment 2.

The Application Template Does Not Distinguish Active Infestations from Preventive Projects

Section 1.1 of the Project Narrative asks applicants to describe the problem and how the project will reduce impacts. It does not ask whether the species is already confirmed in the project area or whether the project is speculative and preventive. WWA suggests that CDFA add a sub-question under Section 1.1 that asks applicants to state whether the target invasive species has been confirmed in the project area, and to provide documentation. Confirmed, active infestations should receive additional urgency weighting within the Project Merit category (40 pts).

Revise Section 1.1 of the Project Narrative to distinguish confirmed active infestations from preventive proposals, with corresponding urgency weighting in Project Merit scoring.

Response 2

No change made, but applicants are encouraged to include this information in the project narrative for consideration.

Comment 3.

Add a multi-jurisdictional coordination bonus (+5/+10 points) for projects operating under JPAs, MOUs, or equivalent regional structures where a single infestation threatens multiple downstream entities.

Response 3.

Additional points will not be added, but applicants are encouraged to include this information in the project narrative for consideration.

Comment 4.

On page 3: “The purpose of this grant program is to support work on minimizing the economic, ecological, and human health impacts caused by invasive species that have been or are likely to be detected in California, with a preference for projects that protect biodiversity and ecosystem health.” (added text underlined)

Response 4.

Replaced the “emphasis on” with “preference for” on page 3

Comment 5.

Given the emphasis on protecting biodiversity and ecosystem health, we suggest changing the order of “economic, ecological, and human health impacts” to “ecological, economic, and human health impacts” wherever it appears.

Response 5.

Changed the order to have ecological first throughout the document.

Comment 6.

Given the emphasis on protecting biodiversity and ecosystem health.

This preference should be awarded more supplemental priority points. Currently, it is worth only 5 out of 20 supplemental points. We suggest increasing this value to 10 points.

Response 6.

No change made

Comment 7.

In the proposal narrative, section 1.1: add “ecosystem health” to the list of benefits.

Response 7.

Change made to proposal narrative section 1.1

Comment 8.

The primary type of qualifying project described in the draft guidelines is on-the-ground, rapid response projects. These are very important, and, meanwhile, Secretary Crowfoot made an important recommendation at the last ISCC meeting that grants would be most valuable if they supported work that strengthened capacity. His recommendation should be reflected in the guidelines. We recommend emphasis be added in the following manner:

- *On page 3: “Priority shall be given to projects that increase regional or statewide programmatic capacity to address invasive species. For on-the-ground efforts, priority shall be given to projects that are species-specific, time-sensitive, new to a geographic region, and likely to prevent the establishment of that species.”*
- *This priority should be reflected in the guidelines for the narrative and in the scoring rubric.*

Response 8.

This comment has been addressed on page 3 by adding the following sentence ‘Additionally, projects that increase or develop regional or statewide programmatic capacity will also be prioritized.’

Comment 9.

As written, projects will not be allowed to request extensions. Per Dept. of Finance, it is routine for bond funds to be extended. Given that the effectiveness of invasive species

projects often benefits from timeframes longer than 3 years, we recommend changing this to: “No-cost extensions will be considered on a case-by-case basis.”

Response 9.

Made the following edit on page 4, “No-cost time extensions may be considered on a case-by-case basis in compliance with all applicable state contracting rules and regulations.

Comment 10.

Given the range of project types allowed under this request for proposals (and including our recommendation for emphasizing projects that increase capacity), reporting requirements will need to be broad enough to capture a range of project benefits.

Response 10.

A report template will be developed that will allow for broad reporting.

Comment 11.

The draft guidelines disallow costs associated with CEQA compliance. We understand that there may be a legal liability concern behind this requirement, but if possible, it would be helpful to some applicants to have these costs covered. On a related note, we do not see in the guidelines any information regarding when CEQA compliance needs to be demonstrated by the applicant/grantee.

Response 11.

Costs for CEQA cannot be charged to the agreement. Applicants should familiarize themselves with the requirements of CEQA and determine if their project will trigger any compliance activities.

Comment 12.

Cost of overtime is disallowed. This may impact on-the-ground projects whose successful execution involves overtime labor, so if unless there’s a hard-and-fast rule here, we recommend removing this constraint. Instead, the guidelines could require that applicants justify any anticipated overtime costs.

Response 12.

Made change to note that overtime may be allowable with prior approval from the department

Comment 13.

We recommend adding scoring considerations or prioritization for projects implemented at watershed or regional scales across multiple jurisdictions, agencies, or landowners. Many invasive species impacts occur across interconnected ecological and hydrologic systems that extend beyond individual parcels or agency boundaries, particularly within riparian corridors, reservoirs, recharge facilities, flood control systems, and post-fire landscapes.

Response 13.

No change made, but applicants are encouraged to include this information in the project narrative for consideration.

Comment 14.

We recommend clarifying that eligible projects may include invasive species management activities that protect or improve groundwater recharge infrastructure, flood conveyance systems, reservoirs, riparian corridors, and regional water supply reliability. Invasive species can significantly affect wildfire risk, sediment transport, evapotranspiration, erosion, and watershed function under changing climate conditions.

Response 14.

No changes were made to the grant guidelines, as the current parameters for funding do not preclude considerations for the stated management activities.

Comment 15.

We recommend clarifying eligibility for monitoring, mapping, GIS, remote sensing, eDNA, predictive modeling, and decision-support tools necessary to prioritize treatment areas, document outcomes, and support adaptive management. These tools are often essential to ensuring limited implementation funding is directed toward the highest priority and highest risk areas.

Response 15.

No changes were made to the grant guidelines, as the current parameters for funding do not preclude considerations for monitoring, mapping, GIS, remote sensing, eDNA, predictive modeling, and decision-support tools necessary to prioritize treatment areas, document outcomes, and support adaptive management.

Comment 16.

Many invasive species treatment efforts require sustained follow-up treatment and adaptive management over multiple years to achieve durable outcomes. We recommend explicitly allowing long-term maintenance, adaptive management, and post-treatment monitoring costs as eligible project components where appropriate.

Response 16.

This funding is not available for projects that extend beyond June 30, 2030, Please refer to AB 107, where the encumbrance or expenditure period was set at June 30, 2028 which would allow funds to be spent through June 30, 2030.

Comment 17.

We recommend considering flexibility for phased or multi-year implementation efforts where invasive species management and restoration activities may require longer treatment and stabilization timelines than a standard short-duration grant cycle allows.

Response 17.

This funding is not available for projects that extend beyond June 30, 2030. Please refer to AB 107, where the encumbrance or expenditure period was set at June 30, 2028 which would allow funds to be spent through June 30, 2030.

Comment 18.

Regional and multi-jurisdictional projects frequently require substantial coordination, stakeholder engagement, permitting support, technical management, and interagency administration. We recommend ensuring reasonable project management and

administrative costs remain eligible within the program budget structure to support successful implementation and long-term sustainability.

Response 18.

No changes were made to the grant guidelines, as the current parameters for funding do not preclude these considerations. The applicant should include all relevant costs and associated narrative in the proposal.

Comment 19.

We recommend providing additional clarification regarding how watershed-scale or upstream projects may demonstrate benefits to downstream disadvantaged and severely disadvantaged communities, particularly where projects improve regional flood resilience, water quality, wildfire resilience, ecosystem function, or water supply reliability.

Response 19.

The following was added to the purpose on page 3 'Projects do not need to occur in disadvantaged or severely disadvantaged communities, but applicants should clearly indicate how those communities will benefit.' The applicant should include all relevant costs and associated narrative for their proposal, including how watershed-scale or upstream projects may demonstrate benefits to downstream disadvantaged and severely disadvantaged communities, particularly where projects improve regional flood resilience, water quality, wildfire resilience, ecosystem function, or water supply reliability.

Comment 20.

We recommend prioritizing projects that integrate invasive species management with broader climate resilience objectives, including wildfire risk reduction, habitat restoration, watershed stabilization, groundwater recharge protection, flood risk reduction, erosion reduction, and ecosystem recovery following disturbance events.

Response 20.

No changes were made to the grant guidelines, as the current parameters for funding do not preclude considerations for projects that integrate invasive species management with broader climate resilience objectives, including wildfire risk reduction, habitat restoration, watershed stabilization, groundwater recharge protection, flood risk reduction, erosion reduction, and ecosystem recovery following disturbance events.

Comment 21.

While we appreciate the inclusion of leveraging and cost-sharing considerations, we recommend ensuring the program remains accessible to disadvantaged communities, smaller public agencies, and regional entities that may have limited local matching capacity despite having high-priority resilience needs.

Response 21.

Per page 7 'The technical review will not factor matching funds into application scores as that practice can disadvantage low-resource organizations in the process of building capacity.'

Comment 22.

The current program framework appears heavily oriented toward Early Detection / Rapid Response (EDRR) project types, including species-specific eradication efforts, isolated infestations, and new introductions to geographic areas.

While those project types are important, many of the most significant invasive species threats in northeastern California are already broadly established and function as landscape-scale ecosystem conversion challenges rather than isolated eradication opportunities.

Examples include:

- *invasive annual grasses*
- *widespread rangeland weeds*
- *climate-driven juniper expansion and woody encroachment*

We recommend that the final guidelines explicitly recognize landscape-scale invasive dominance and long-term containment strategies as eligible and competitive project types alongside traditional EDRR frameworks.

Response 22.

No changes were made to the grant guidelines, as the current parameters for funding do not preclude considerations beyond Early Detection / Rapid Response (EDRR) project types.

Comment 23.

Recognize Resilience-Based Management Approaches

In Great Basin transition landscapes and interior rangelands, the highest-priority invasive species threats require long-term, adaptive management strategies. In these systems, the most effective and scientifically supported approaches are sustainable pest management and resilience-based management strategies that combine multiple treatment methods over time, including strategic and proven herbicide applications followed by revegetation or reseeding.

We recommend that the final guidelines recognize that successful invasive species management outcomes will vary across California's diverse ecological regions. In northeastern California, many of the most significant invasive threats are already broadly established, making eradication-based success metrics unrealistic. In this region, success should also be defined by measurable improvements in ecological resilience, habitat function, wildfire risk reduction, watershed health, working lands sustainability, and long-term containment of invasive dominance.

Response 23.

No Changes made as per page 4 Climate Bond language for Invasive Species notes 'The Invasive Species Program will provide funding for invasive species projects and

activities recommended by the Invasive Species Council of California (ISCC) to exclude or rapidly eradicate invasive species from California.’ The grant guidelines note ‘Funded projects may include, but are not limited to, management actions for preventing introduction of invasive species, control, containment or eradication of an invasive species, and outreach and education, and research related to invasive species.’ Applicants who apply for projects such as those listed above will not be disqualified and should fully explain all benefits from the project.

Comment 24.

Clarify Eligibility for Native Species Encroachment and Ecosystem Conversion
The draft guidelines do not clearly address whether projects responding to native species encroachment or climate-driven vegetation transition are eligible. In northeastern California, western juniper expansion is driving large-scale sagebrush ecosystem conversion, reducing rangeland productivity, impairing watershed function, and increasing wildfire risk.

We recommend that the final guidelines explicitly clarify that projects addressing native species behaving invasively, including woody encroachment and ecosystem conversion, are eligible and competitive under this funding opportunity.

Response 24.

No Changes made as per page 4 Climate Bond language for Invasive Species notes ‘The Invasive Species Program will provide funding for invasive species projects and activities recommended by the Invasive Species Council of California (ISCC) to exclude or rapidly eradicate invasive species from California.’ The grant guidelines note ‘Funded projects may include, but are not limited to, management actions for preventing introduction of invasive species, control, containment or eradication of an invasive species, and outreach and education, and research related to invasive species.’ Applicants who apply for projects with native species acting invasively will not be disqualified.

Comment 25.

Clarify Reseeding Eligibility and Restoration Expectations
Many restoration-based invasive species projects in our region require reseeding to achieve long-term ecological recovery, as immediate native reestablishment is not always feasible. In many cases, reseeding is not optional but necessary to prevent reinvasion and support durable restoration outcomes. We request clarification regarding the eligibility of reseeding activities, including the use of non-native, but restoration-appropriate, species where necessary.

Response 25.

No Changes made as per page 4 Climate Bond language for Invasive Species notes ‘The Invasive Species Program will provide funding for invasive species projects and activities recommended by the Invasive Species Council of California (ISCC) to exclude or rapidly eradicate invasive species from California.’ The grant guidelines note ‘Funded projects may include, but are not limited to, management actions for preventing introduction of invasive species, control, containment or eradication of an invasive

species, and outreach and education, and research related to invasive species.’ Applicants who apply for projects such as those listed above will not be disqualified and should fully explain all benefits from the project

Comment 26.

Invasive annual grasses represent one of California’s most significant wildfire and climate-related threats, particularly in northeastern California and other interior rangeland regions.

These species contribute directly to:

- *increased wildfire frequency and intensity*
- *habitat degradation*
- *impaired watershed function*
- *agricultural losses*
- *reduced climate resilience for disadvantaged and vulnerable rural communities*

We recommend that the final guidelines explicitly identify invasive annual grasses as a statewide priority due to their impacts on wildfire risk, ecosystem function, watershed health, agricultural viability, and rural community resilience.

Response 26.

No changes were made, as the grant guidelines do not define priority species and will instead rely on the technical review committee to evaluate the merits of the grant application.

Comment 27.

The current 24-month project term may be too limiting for restoration-focused projects that require multiple treatments, reseeding, follow-up, and monitoring. In rangeland systems, ecological response and restoration success often cannot be meaningfully evaluated within two growing seasons, particularly under variable conditions. To support meaningful outcomes for restoration-based projects, we recommend longer implementation periods or phased project structures where multiple treatment and monitoring cycles are necessary.

Response 27.

This funding is not available for projects that extend beyond June 30, 2030. Please refer to AB 107, where the encumbrance or expenditure period was set at June 30, 2028 which would allow funds to be spent through June 30, 2030.

Comment 28.

The program’s emphasis on biodiversity, ecosystem health, and vulnerable communities is important, but the final guidelines should more clearly and explicitly recognize that in many regions of California, those outcomes cannot be achieved without effective invasive species management on working lands. Rangelands and other actively

managed landscapes are not peripheral to this work; they are central to addressing some of the state's most significant invasive species threats.

In northeastern California, many of the highest-priority invasive species challenges occur at landscape scales on working lands, where long-term stewardship, implementation capacity, and landowner participation are essential to success. Local and regional entities operating in these landscapes bring trusted relationships, operational readiness, and place-based knowledge needed to deliver results. The final guidelines should explicitly recognize working lands and locally based implementation partners as critical to achieving statewide invasive species and climate resilience goals. Without that recognition, the program risks overlooking some of the landscapes where invasive species impacts are greatest and where effective implementation is most achievable.

We urge the State to ensure the final guidelines are broad enough to support the full range of invasive species challenges facing California, including established, landscape-scale threats on working lands.

A more inclusive and regionally responsive program design will improve both accessibility and long-term ecological impact.

Response 28.

No changes were made to the grant guidelines, as the current parameters for funding do not preclude considerations for working lands and locally based implementation partners as critical to achieving statewide invasive species and climate resilience goals.

Comment 29.

If possible, the funding range should be larger, with smaller awards available depending on the project, and that the duration be as long as possible to cover work for a longer time, as invasive species are rarely controlled in two years. We want this money to be effective—a small project can be very effective; indeed, with EDRR work, they are often the most effective projects. Some organizations may not be able to execute a large project.

Response 29.

The funding range was set by the California Invasive Species Advisory Committee and approved by the Invasive Species Council of California. Smaller funding requests for EDRR should come through the CISAC Rapid Response Grant solicitation.

Comment 30.

Since seems to be a one-time funding windfall, suggest an emphasis on projects that build programmatic capacity for the long term.

Response 30.

This comment has been addressed by adding the following sentence on page 3
'Additionally, projects that increase or develop regional or statewide programmatic capacity will also be prioritized.'

Comment 31.

Recommend focusing more on biodiversity of the landscape which should be the most important focus on this funding. But also be mindful not to exclude disadvantaged communities if an effective and important project is there.

Response 31.

No change made, but applicants can include the focused work they are doing to improve biodiversity of the landscape in the project narrative for consideration in the technical review.

Comment 32.

Evaluation Criteria

All applications will be evaluated based on the criteria detailed below

COMMENT: Excellent to include the scoring sheet!

Response 32.

Thank you for your comment.

Comment 33.

*Follow the guidelines laid out in the "Simplifying Funding Pathways" section of the "Delivering a Successful Climate Bond" guidance published by CNRA in September 2025. Specifically, replace the currently proposed application process with the **2-step process**: In the two-step process, the first step involves grant applicants sharing a short "pre-proposal" or "concept proposal." The second step involves submitting a longer, full proposal for projects identified as having potential for program funding. This process makes it much easier for smaller organizations with limited budgets for grant writing to determine early on whether their proposals have a good chance of being funded before they invest time and resources in a full proposal. It also results in less time spent by the funder reviewing proposals that don't qualify and ensures that those proposals that move to the full application stage have the best chance of delivering the desired results.*

This meshes well with the TA that is to be provided to applications, as laid out in the draft guidelines.

Response 33.

The decision for a one step application process was to simplify the application process and fund projects as quickly as possible.

Comment 34.

Under allowable costs, we suggest adding the four Indirect Cost (IDC) rate options listed in the bond statute for determining allowed reimbursement percentage.

Response 34.

Page 3 of the ISG Budget Template notes the four allowable indirect cost rate options listed in the bond statute. The following statement was added to page 10 of the grant guidelines: Please see the guidance from the Climate Bond for details on the four acceptable indirect cost rates. See page 3 of the ISG Budget Template for more details.

Comment 35.

Some agency programs post their responses to comments submitted. We hope you will do this – it helps partners better understand the program.

Response 35.

Comments and responses are posted per the request.