

# 2016 SPECIALTY CROP BLOCK GRANT PROGRAM

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## Public Comments in Response to the Proposed 2016 Program Priorities

On Friday, September 18, 2015, the California Department of Food and Agriculture (CDFA)'s Office of Grants Administration (OGA) solicited public comments on the 2016 Specialty Crop Block Grant Program (SCBGP) proposed program priorities. OGA received invaluable comments on the program priorities along with suggestions for the program and department overall and thanks all members of the public and stakeholder organizations that participated in this important process. Comments were considered in finalizing the 2016 SCBGP program priorities, and may also be considered in future years. Comments received during the public comment period regarding the program priorities are detailed below (comments regarding the program priorities were edited when necessary to provide anonymity to the submitting individual or organization):

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*I have read the proposed new program priorities for the Specialty Crop Block Grant program. The organization of the proposed program priorities is excellent. We now have a much clearer guideline for how and where our work fits within the priorities of the Specialty Crop Block Grant program (specifically, increasing access to fresh fruits and vegetables in corner stores, Market Enhancement, Category B).*

*Thank you very much for this clarification and I hope that you are able to adopt the new program priorities.*

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*I would recommend an additional focus to assist farmers who use input-intensive, non sustainable/conventional farming practices to move from those practices that are harmful to the health of farm workers, consumers and the environment to transition into using sustainable practices in order to qualify for them to gain support from the California Grown marketing brand.*

*The SCBGP funds could be critical to removing barriers that many small/medium growers in California face, including:*

- short-term land leases that prohibit them from certifications that can increase their marketability*
- Equipment such as tractors and greenhouses*
- Water conserving irrigation systems*
- on-site or near-site cold storage that is accessible and affordable*
- transportation -- either their own refrigerated vans/trucks, or space on larger distribution trucks that is affordable and accessible certifications for using practices that are not harmful to the environment, farm families, farm workers and consumers*

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*The CDFA 2016 call does not mention a single thing about improved labor use efficiency. CDFA needs to encourage engineering responses to improve labor use efficiency. Many of our crops are hand harvested*

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*and hand weeded. CDFA Specialty Crop Research Initiative (SCRI) seems to focus on plant breeding programs yet ignores engineering. Breeding is good but most projects, salt tolerance, drought tolerance breeding, herbicide tolerance breeding can not make much progress during 33 months. On the other hand robotic projects can more easily fit within the 33 month period. California has great technological and engineering capabilities yet CDFA SCRI ignores this why? I am not saying do not fund breeding programs, but find balance and encourage out of the box creative solutions.*

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*Thank you for the opportunity to comment on 2016 Program Priorities.*

*In Funding Area I: Market Enhancement, please encourage providing SAMPLES of specialty crops rather than simply discussing specialty crops in the media. Let's support local growers by purchasing their produce and using the produce as marketing tools. Taste buds are educated once people TASTE the difference in California grown food. Also, school gardens are ideal marketing opportunities: children who plant a seed, tend the crop, harvest it and prepare it are sold on eating healthy California specialty crops.*

*It pleases me that you include in Funding Area II: Training and Education, the opportunities for grants that benefit the health and well-being of all Californians. We know that close to 1/3 of the California population is obese, another 1/3 is overweight, and a significant amount of children, ages 2 – 19, are obese. The AMA lists obesity as a disease. Treating the disease of obesity promises to cost the State of California an enormous sum of money. Please consider focusing on the COST of PREVENTING this disease through proper diet in contrast to treating the disease and offer specialty crop grants in this area.*

*Also, 40% of ALL the food purchased in California ends up as waste. Please consider a focus on positively dealing with specialty crop waste as a means of saving/preserving the food's nutritional values and reducing landfill mass.*

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*Thank you very much for the opportunity to comment*

### Market enhancement

*Having experienced the Farmers Markets in Southern California, we will like to suggest that some research should be done about*

*-steps and time needed by a farmer to get into a F.M.*

*-effectiveness of the F.M. in helping farmers market their products*

*-number of vendors per F.M. compare to the number of farmers*

*-percentage of farmers production that sells through the F.M.*

### Research

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*-some basic research of advance cultural practices should certainly help specialty crop farmers. Studies on high density production for different crops should enhance our competitiveness by helping us achieve new production goals*

*-breeding for new drought resistant cultivars.*

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*After careful review and thorough discussion [we] strongly endorsed the three Funding areas and program Priorities. Market Enhancement Categories A and B are closely aligned and consistent with the goals and objectives of [our organization] and the members we represent. The priority related to food safety and life style benefits is one we had not strongly considered in the past but after discussion the board members felt [we] should also focus on these issues.*

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*The proposed program priorities are in line with what I think is needed as it covers many areas including Marketing, Nutrition Education and Research. Having funds to promote specialty crops grown in California to increase the public's awareness is crucial to support and highlight local farms. Additionally expanding Nutrition Education to students, who will become future consumers and producers is essential to set the foundation of an appreciation of agriculture, focusing on locally grown specialty crops. California's network of Fairs are underutilized as potential outlets to promote and highlight California Specialty Crops. If a priority could be included to focus on Fairs as organizations who could assist through Marketing, Education and/or Research, this would be a great addition.*

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*We commend you for the inclusion in the program priorities of climate mitigation and adaptation, specifically in Research Category A. As articulated, this research category addresses a critical need and opportunity for enhancing soil health, improving water use efficiency and expanding organic and sustainable production practices to the benefit of greenhouse gas reductions, enhanced resilience and a multitude of environmental and health benefits. The findings of the projects funded by this program will be very helpful in the evolution of the Governor's Healthy Soils Initiative.*

*We are also pleased to see a focus on drought adaptation in the Fixed Amount Awards, again hopefully making connections to both the Healthy Soils Initiative and the SWEEP program as well as water efficiency programs of the Department of Water Resources.*

*We have one recommendation to suggest in the Training and Education Category B: Equipping Current and Next Generation Specialty Crop Farmers that could further strengthen the connections between this Specialty Crop Block Grant funding and existing and anticipated programs. We know that providing technical assistance, education and outreach to growers is critical for the adoption of new practices. Certainly this will be true as we anticipate the implementation of Healthy Soils and the continuing improvement of SWEEP. However we also know there is some question about the ability to allocate cap-and-trade funding to technical assistance. Training and Education Category B could provide resources to bridge this need by adding the following program priority:*

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- *Provide technical support, education and outreach on projects that reduce on-farm greenhouse gases and/or sequester carbon*
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*The 2016 Specialty Crop Block Grant Program has great potential to work with farmers, communities, and researchers to improve the sustainability and health of our communities, farms, economy, and environment. The Program is commendable in the potential to aid communities and market systems to work towards ameliorating some of the United States' biggest social issues, namely inequity in food access and the related education, health, and social inequalities (Healthy Eating Research, 2008). Special consideration should be given to programs that creatively work with markets, subsidies, and communities to improve access to food in currently underserved areas.*

*Moreover, the Program has the potential to facilitate research to improve the sustainability of agriculture and show that environmental and social considerations are not antithetical to economic profit. However, one gap in the Program is the lack of engagement with farmers. Though funding for research related to soil health, carbon sequestration, water use efficiency, and sustainable pest and disease control is essential to improve California's environmental health and agricultural productivity, the knowledge is only useful if researchers work with farmers to implement their findings. Agri-environmental schemes in the European Union, for instance, have had limited impact because farmers are not participating as expected (Espinosa-Goded, et al, 2010). While researchers may find practices that are at once economically, socially, and environmentally beneficial, farmers may still not implement these "potential win-win situations" (OECD, 2012) due to factors related to the social, economic, and personal context in which the farmer operates (Karali et al, 2014). Though in the EU overall farmers are participate in Agri-environmental schemes in low numbers, a study in Switzerland found that 90% of farmers are participating in the Swiss Direct Payment program for ecological management practices (Karali et al, 2014), suggesting that motivations for implementation are locally specific. A variety of economic, societal, policy, environmental, household, and personality factors motivate farmers. The Program as written seems to go around farmers, the people and businesses with control over their farm practices and the resulting greenhouse gas emissions, water pollution, nitrate leaching, soil erosion, and other environmental and health impacts.*

*In light of this, the Program should additionally provide funding to engage farmers in implementing new research and improving food access. These funds could be under Funding Area II and Funding Area III. They could include:*

- *Funding programs that research how to motivate farmers specifically in California to implement more sustainable practices.*
- *Provide funding for farmers to create networks with other farmers and/or researchers to communicate about environmental issues, best management practices, and site-specific knowledge (OECD, 2012) (Knapp and Fernandez-Gimenez, 2009).*
- *Provide funding to test practices on a small scale on individual farms. Farmers are willing to take on risk to try new practices or products on a small scale (Shaffer et al, 2013). While this funding may*

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*initially benefit one individual farm, the data on how a practice functions in a specific area is valuable for all farmers in the area.*

*Improving the sustainability of California's agriculture is critical to ensuring its long-term economic competitiveness. Research on best management practices is important to help improve knowledge on the impact and solutions, but the Program also needs to facilitate the implementation process to truly make an impact on the future sustainability and health of our agricultural economy, environment, and local communities.*

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*Thank you for the opportunity to comment on Specialty Crop Block Grant (SCBG) program priorities for 2016.*

*Our overall comment is that the definitions of the SCBG program funding areas and priorities should promote a holistic approach that does not artificially separate environmental stewardship and conservation from other aspects of agricultural practice.*

*In particular, we urge you to link the goals of Environmental Stewardship and Conservation (Funding Category III*

*A) to those of Plant Health and Pest Management (III B). A growing body of evidence (in the discipline variously called ecological, conservation, biological, regenerative, or restoration agriculture) demonstrates that plant health and reduction in pest pressures are directly, integrally related to practices that protect the environment and promote soil health.*

*Ecological agriculture practices by definition provide a host of environmental stewardship benefits in addition to non-toxic plant pest and disease management. These include carbon sequestration/climate change mitigation, water conservation and drought resilience, and reduction in pesticide and synthetic fertilizer pollution. Also, as documented in studies by the Organic Center and others, crops grown using ecological agriculture methods provide superior nutrition to those that are conventionally grown, so nutritional value of specialty crops (covered in SCBG Funding Area II A) should not be treated as a separate issue from ecologically sound production methods.*

*In light of the intersections of the various SCBG funding categories and the efficiency and desirability of holistic approaches that meet multiple goals, we recommend that:*

*- A category be created for holistic proposals that address several of the funding areas with an emphasis on ecologically sound practices, and that proposals submitted in this area be given top priority for funding.*

*- Funding Area III, Category B (Plant Health and Pest Management) be linked to the key goals of the environmental stewardship category (A) and give priority to approaches that protect human and environmental health generally (in addition to minimizing "economic and environmental harm to specialty crop growers" as stated in bullet 2 in IIIB). Specifically, we recommend adding a bullet under Category*

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*IIIB that states “Develop pest and disease management methods that minimize impacts on human and environmental (particularly pollinator) health.”*

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*Thank you for this opportunity to comment on the proposed program priorities for the 2016 Special Crop Block Grant Program (SCBGP).*

*The SCBGP has been very beneficial to California agriculture and has provided opportunities for growth with many of California’s farmers.*

*The three funding areas identified in the proposal are laudable. We believe that the program should continue its emphasis on market development and research to ensure the viability of specialty crops in the agricultural landscape. Funding for new methods of Integrated Pest Management, disease management, variety and root stock development will go a long way to enhancing the viability and profitability of all specialty crop farmers in California.*

*We applaud the emphasis on the development of markets for California’s specialty crop farmers. Ours is truly a world-wide market. While consumers around the world appreciate the quality and variety of the crops we produce, promoting growth in the market place will bring California’s production to more consumers while providing additional opportunities for the state’s farmers.*

*We support the emphasis on research to support producer’s efforts in growing their crops. Obvious opportunities exist in relation to water and nutrient management as growers work to raise their crops in an age of limited water resources and increasing regulatory pressure on nutrient applications. In that light, we feel that supporting research in the area of air and water quality is especially relevant and should be emphasized. Decision support tools that are useful to growers in the increasing regulatory environment will also provide producers with the technology needed to efficiently manage their crops while reducing environmental impacts.*

*We also support the availability of funding to industry groups such as cooperatives and marketing orders who are directly linked to specialty crop growers and closely involved with efforts to educate their grower communities. These organizations are a direct conduit to the state’s specialty crop growers, with established connections that may be easily leveraged for quick results.*

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*We wish to endorse the Proposed 2016 Program Priorities as released on September 18, 2015. The range of funding programs offered, total of \$19,000,000 to be made available for grants, and the time period of grant projects from October 1, 2016 through March 31, 2019 all give adequate time for commodity groups such as [ours] to prepare one or more quality applications.*

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*We urge CDFA to adopt program priorities that catalyze this energy and demographic transition in agriculture to support projects focused in the Central Valley, that can work to simultaneously ameliorate*

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*some of the worst food deserts in our state, located in rural areas, as well as heal environmental burden through environmentally friendly agriculture.*

### *Market Enhancement*

#### *California Grown Promotion*

*In the category of Market Enhancement we are pleased to see the promotion of the California Grown Promotion category, however we urge CDFA to take all necessary steps to incorporate all members of the farming community under this strategy. Many small farmers and farmers of color who are linguistically isolated may not be able to access this form of marketing and will require additional supports to participate.*

#### *Market Expansion and Access*

*We suggest incorporating language around regional marketing of specialty crops so as to address the historic inability of small farmers to market to their local, often disadvantaged, communities. While we often work with small farmers who market their crop across state to achieve access to improved markets and higher margins, we would like to see program funding awarded to organizations who also support the regional marketing of crops to address rural food disparities that plague the San Joaquin Valley in particular.*

### *Training and Education*

#### *Equipping Current and Next Generation Specialty Crop Farmers*

*We encourage CDFA to incorporate language in this section to address linguistic isolation and culturally appropriate training. The children of our small farmers are the face of a new agriculture for the San Joaquin Valley. Without concerted priority placed towards the training and retainment of the young generation of small farmers, we may see a decline in these farmers' ability to cope with the economic and environmental stresses that burden them. We would like to see CDFA place specific attention to the new generation (daughters, sons, and family) of ethnic minority and socially disadvantaged farmers. We would specifically like to see CDFA incorporate language around "retainment of existing small farmers" and incorporate language around "retention of cultural practices such as biodiverse planting, traditional IPM and soil conservation methods"*

### *Research*

#### *Environmental Stewardship and Conservation*

*Agriculture plays a significant role in the production of greenhouse gases (GHG), and as climate change science progresses, we are ever more aware of the role of the entire food system, from seed to plate, in contributing a staggering percentage to GHG emissions. Agriculture also holds many potential solutions and can serve as an assistant in reaching California's climate goals. Localized agriculture has played a positive role in climate change solutions and mitigating climate impacts the world over, and a wealth of international science speaks to the potential of smallscale agriculture in improving soil carbon, bringing down local temperatures, and improving chances for disaster resilience.*

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### *Food Safety Modernization Act and Drought Adaptation*

*[Our organization] urges CDFA to award grant dollars to project that assist farmers in achieving economic self sufficiency and land ownership. Some of the greatest barriers to compliance with FSMA as well as meeting water conservation goals come from a systemic lack of access to land-ownership. Without access to fee-title ownership, the basic infrastructure needed to meet FSMA standards are difficult, for instance, making the capital investment towards food-safety certified wash stations, restrooms and hand-washing stations, and other basic infrastructure.*

*Additionally many farmers suffer from lack of access to well-ownership and pay water rental bills to a land-owner. Without personal investment in their own land, capital investments such as solar pumps, drip systems, soil tensiometer systems and other water conservation schema and practice remain inaccessible.*

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*Thank you for soliciting comments on the SCBGP Program Priorities. The following comments are offered in response to your solicitation:*

- 1. The streamlining of three main funding areas is appreciated and provides a clearer guideline for applicants.*
- 2. Prior years have not had a category dedicated to one particular program or organization. The heavy emphasis on California grown promotion is understood, but, based on our understanding, membership in California Grown is required to use the CA Grown label/branding, which would be necessary for applicants seeking funding in this category to obtain, at a cost to the applicant. A separate review process, with a separate committee independent of the specialty crop reviewers does bring expertise to the review process, but also is not a truly independent review process, as the rest of the SCBGP is. This also seems like a departure from emphasis in the prior years to not focus on brand awareness (CA Grown vs commodity grown in CA).*
- 3. Market Enhancement: There is no mention of foreign or domestic retail market development, which is significant in increasing demand for specialty crops. I would recommend adding a bullet point to the effect of prior years of : "Create economic opportunities for specialty crop producers through specialty crop market development activities that focus on local, regional, or international markets."*
- 4. Market Enhancement: There may be a need for a an additional bullet point "Studies exploring the feasibility of market expansion efforts that increase consumer demand for specialty crops."*
- 5. Market Enhancement: Market enhancement and market access may be more suited to be separate categories (i.e. Market Enhancement Category B, Market Access Category C). Efforts to increase demand of specialty crops and increase profitability to growers are distinctly different than increasing access to fresh fruit in urban communities or increasing the specialty crop consumption in schools. Reviewers may have difficulty seeing the merits of each proposal without this change and the expertise of reviewers may be better suited to have these categories split.*



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6. *Training and Education, Category B: I would suggest the addition of a bullet point, similar to prior years that states: “Training current and next generation farmers in “Good agricultural Practices,” “Good Handling Practices” and “Good Manufacturing Practices.”*

7. *Research Category A: I would suggest the addition of a bullet point, similar to prior years that states: “Develop and implement practices and strategies that improve farm viability and the agricultural economy as well as the environment.”*

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*We appreciate your soliciting comments on your new direction.*

*[Our organization] supports the two programs you have called out for Fixed Amount Awards. Based on our on-the-ground work with CA Specialty Crop growers, funding in this area would be of benefit to our CA growers, enabling them to be more competitive and successful.*

*We agree that it is wise to support Market Enhancement. While the California Grown promotion program is strong, there are a number of other worthy locally-grown labels and programs through out the state that are impactful for growers in terms of cultivating their buyers and increasing grower revenue. Our recommendation is to not limit funding to California Grown.*

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*In our review of the SCBG Program’s proposed 2016 program priorities, we see great promise in identifying and prioritizing projects that can address all three funding areas (market enhancement, training and education, and research) simultaneously. Simply said, investments in projects that serve multiple interests — from education and training to market enhancements to environmental stewardship will, without any doubt, deliver more “bang for the buck” and be wiser, more productive investments of taxpayer dollars.*

*We recognize and support the three funding area emphases, but strongly encourage prioritization within each area to include projects’ capacity to address multiple funding area concerns, with greatest emphasis on environmental stewardship. In addition, special priority should be given to projects near particularly vulnerable populations (e.g., young children and seniors) and in disadvantaged communities where the local population is overburdened by pollution.*

*Environmental Stewardship should be a fundamental requirement for projects in all funding areas.*

*Of the funding areas presented, we consider the emphasis on Environmental Stewardship (Area III, Research) as the area that shows the most promise for providing long-term benefits to California’s specialty crop producers. The second emphasis within Research (Plant Health and Pest Management) should be considered a subset of Environmental Stewardship, since the establishment or improvement — and subsequent maintenance — of healthy soils are as fundamental to ensuring plant vigor and resistance to pests and disease as it is to building soil organic matter content (sequestering carbon) and ensuring drought tolerance.*

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*Thus, a focus on environmental stewardship should by no means be relegated to only the Funding Area III on Research, but rather be integrated into Areas I (Market Enhancement) and II (Training and Education) as well. The “Proposed 2016 Program Priorities” appropriately stated that the expansion of stewardship practices and development of ecosystem services can serve to improve the environmental and financial performance of California specialty crop growers.*

*The “eradication” goal should be eliminated from Research Category B (Plant Health and Pest Management)*

*With extremely few exceptions throughout the history of agriculture in California and around the globe, eradication of pest and disease organisms is neither attainable nor necessary. To allocate resources to achieve an unattainable and unnecessary goal is a waste of precious resources. In agricultural ecosystems, as in natural ecosystems, “pest” organisms generally occur, but only become pests when ecological conditions are such that natural control systems fail to keep them in check. In agricultural systems the “in check” level is often quantified as an economic threshold. We therefore support the research goals within this section to develop detection tools and environmentally safe methods of pest management that will serve to minimize economic or environmental harm to specialty crop growers.*

*Fixed Amount Awards: Adaptation to Drought.*

*We applaud CDFA’s support of practical on-farm projects that help growers adapt to drought by using methods that reduce water use or improve efficiency. However, this description should absolutely include methods that also increase soil health and specifically water-holding capacity. It is well known that waterholding capacity increases significantly as organic matter content increases. Therefore, priority should be given to projects that both reduce water use and reduce water need through explicitly increasing the soil’s capacity to hold and deliver water to crops.*

*Market Enhancements: California Grown Promotion*

*The criteria, perhaps under the third bullet, should be expanded to clarify that food safety includes not just absence of human pathogens but absence of pesticide residues as well. Thus priority should be given to organic and production systems free of the use of hazardous synthetic pesticides.*

*The fourth bullet’s emphasis on environmental stewardship is laudable. However, in practice, outreach activities supporting or claiming environmental stewardship should be linked to documented evidence of practices that deliver concrete ecosystem services. Though this comment may present a level of detail beyond the simplified outline of this proposal, we feel it is important to emphasize that education about ecosystem services must reflect real deliverables.*

*Training and Education: Specialty Crop Nutrition Education*

*The criteria should be expanded to recognize that all specialty crops are not created equal. Priority should be given to organic production and systems free of hazardous synthetic pesticides. This is crucial to ensure protection from exposure to food-derived pesticide residues, especially of young children, seniors and immune-suppressed individuals. We make this suggestion as a precautionary approach based on government concerns regarding the inadequacy of residue testing programs and on the substantial*

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*uncertainty regarding potential health effects of dietary exposures to pesticides when one considers the probable synergistic and/or additive effects of exposures to multiple residues from multiple foods.*

### *Training and Education: Current and Next Generation Farmers*

*We fully endorse efforts to support the next generation of specialty crop producers. We would like to see the final bullet (“solve production issues”) to be expanded to specify issues of highest priority including building and maintaining soil health and water quality; adaptation, mitigation and resilience to climate change; delivery of ecosystem services; and enhancement of rural development economic opportunities.*

### *Conclusion*

*We support the three funding area emphases — market enhancements, training and education, and research*

*— but strongly encourage prioritization within each area to include projects’ capacity to implement environmental stewardship, (especially near vulnerable populations and in disadvantaged communities), rather than those concerns only being addressed in the research section. Prioritizing environmental health and stewardship concerns across all three areas will result in much greater positive, long-term impacts on California’s specialty crop producers and the agricultural.*

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*With regards to the Specialty Crop Block Grant Program, [we] would like to comment on two categories listed in the Proposed 2016 Program Priorities*

### *Funding Area II: Training and Education*

#### *Training and Education Category B: Equipping Current and Next Generation Specialty Crop Farmers*

*Add provision for urban agriculture students, workforce training, innovation and production issues.*

### *Funding Area III: Research*

#### *Research Category A: Environmental Stewardship and Conservation*

*Under "Expand organic and sustainable production practices," we request the additional consideration of diversified farming practices and agroecological practices as important elements of sustainability that research has shown can improve yields, farmer income and environmental sustainability.*

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*As you move forward with priorities for the 2016 Specialty Crop Block Grant Program (SCBGP), I request prioritization of developing replacements for methyl bromide and other soil fumigants used to manage soilborne pests, diseases and weeds that are critical for the survival of California’s strawberry industry.*

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*The strawberry industry was built around the use of fumigants to accomplish this purpose. Increasing fumigant restrictions and phase out of methyl bromide make development of effective replacements and new cultural practices a necessity for the industry.*

*With regard to Funding Area III: Research Category B: Plant Health and Pest Management, [our organization] requests the prioritization of replacements for methyl bromide and managing soilborne diseases.*

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*Upon reviewing CDFA's new SCBG program priorities, having the priorities broken down further make it very clear for potential applicants to draft more effective concepts to enhance California's specialty crops.*

*Under Funding Area II: Training and Education, Category B, we suggest changing the language to include international trade development as a priority. Example, bullet 2 could read, "Creating and implementing workforce training programs to maintain and develop the technical skills required to keep the California specialty crops sector competitive both foreign and domestic". Under examples, we suggest, "Recruit and train specialty crop farmers, marketers and distributors to be competitive in both foreign and domestic markets".*

*International trade development is crucial to many California specialty crop farmer's sustainability, and is a national priority.*

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*Thank you for this opportunity to comment on the proposed program priorities for the 2016 Special Crop Block Grant Program (SCBGP).*

*The Specialty Crop Block Grant Program was designed and intended to help US specialty crops maintain competitiveness through research and assistance in expanding markets. This segment of agriculture realized that research was critical to maintaining their competitiveness in a global market place when they requested such funding be included in the Farm Bill. The SCBGP has been very beneficial to California agriculture and has supported, built upon, expanded research funded or prioritized by [our organization] over the nearly 10 years of the program.*

*The three funding areas identified in the proposal are laudable, however some of the emphases provided in each area limit the research, training, or marketing options the program could be used for.*

*The main concern is that the areas for research do not explicitly cover the wide range of issues California growers face primarily due to regulatory issues. There is insufficient emphasis on the need for practices that enhance production, water quality, air quality (such as ozone, PM2.5, PM10, dust), ecosystems while also keeping crop production costs competitive in a global market.*

*- The focus on climate change, while laudable, is too limiting. We face numerous issues that have little to nothing to do with climate change*

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- The “AND” should be changed to “OR” or “AND/OR” as can reduce GHG emissions without sequestering carbon: “Develop strategies and tools to enable specialty crop growers to adapt to climate change by reducing greenhouse gas emissions and or sequestering carbon.

- While we think soil health is important, for irrigated perennial crops soil health is a more complicated story than for annual crops. A key need for all California specialty crops is improvements in nutrient management which may or may not address soil health (e.g. a nutrient budgeting tool, or assessing how much nutrients are needed for various crops doesn't improve or hurt soil health necessarily). We suggest that this area be expanded to state: Soil health and/or improved nutrient management.

- Another key area that is not specified is the need for better decision support tools and tools for precision agriculture that work for specialty crops. If growers are to meet the expectations that crop inputs are used more efficiently and move less into the environment, then growers need more technology to aid in that process.

*In the area of pest management the outlined priorities cover the wide range of pest management issues specialty crop growers' face.*

- There continues to be a wide range of questions related to how best to ensure food safety when growing food in the outdoors.

*In terms of outreach and education priorities many key priorities from our perspective are reflected in the proposed SCBGP priorities – such as FSMA outreach, training programs that enhance the technical and production skills of growers. Bringing the latest research, techniques and technologies to almond growers has been a long-standing mission of [our organization].*

- However, we note if a crop can be produced with sufficient income and with sufficient freedom of choice how to grow, younger folks return to the farms. We are seeing many 3-4 generation farmers returning to their almond orchards after periods away. Also, currently the ag programs at the California Universities are booming with students – indicating that there is already a high interest by young people in agriculture. Thus, we are not convinced outreach is specifically needed to encourage younger people to become farmers.

- One issue not fully addressed is how to develop outreach programs to part-time growers, most of which are specialty crop growers. Over 30% of almond growers are part time growers. However, the majority of outreach programs occur within the normal work day hours.

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### *Suggestion Regarding New Program Priorities of the Specialty Crop Block Grant Program*

*I submit this suggestion in response to the September 18, 2015 solicitation by the California Department of Food and Agriculture (“CDFA”) for Public Comments on New Program Priorities of the Specialty Crop Block Grant Program.*

*The purpose of CDFAs Funding Area III, Research, is to “. . . focus on improving the competitiveness of California specialty crops through projects that invest in specialty crop research.” The USDA Definition*

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*of Specialty Crop states: “If a naturally occurring population of plants is brought under management and that plant satisfies the definition of specialty crop presented in the second paragraph of this document, then those plants would be considered specialty crops.” The definition referred to includes tree nuts, and states that “natural populations of native plants that are brought into cultivation . . . are considered specialty crops by USDA.” Further, “. . . states may choose to define plants collected from the wild as specialty crops.”*

*The nuts of the California Bay Laurel tree (Umbellularia californica), among other traditional native foods in California, including, for example, manzanita, meet the USDA definition of specialty crop, but are not, to my knowledge, currently “under management” on a level that supports production on a viable commercial level because of lack of the necessary scientific information.*

*I therefore respectfully suggest that Funding Area III, Research, be expanded to expressly include research to:*

- 1) Identify the factors that determine the health and level of production by native plants of their edible products, for example the nuts of the California Bay Laurel tree and the berries of the manzanita; and to*
- 2) Develop the knowledge and techniques necessary to begin commercially managing or cultivating native food plants for the production of significant marketable quantities of those products.*

*I believe that adoption by CDFA of these suggested changes would lead to the creation of a significant new horticultural industry in California. Because the subject plants are native to California, and well adapted to their environment through millennia of evolution, developing them as food products is by nature environmentally friendly and sustainable in the long term, even in drought conditions.*

*For all of the above reasons, I urge the California Department of Food and Agriculture to improve its Specialty Crop Block Grant Program by making the minor changes I have suggested.*

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