

Name1	Organization	Comments on the Program Guidelines or Grant Award Procedures Manual
Kari Arnold	UC Davis	Excellent program. Could this program consider offering funds to assist with the purchase of pressure chambers (Scholander bomb) for irrigation management? The tool can be a expensive for growers, but is an excellent first hand way of measuring water stress.
John Weddington	Green Valley Irrigation and Supply	It is critical that central valley agriculture be properly represented by Block Grant service areas. The largest opportunity for water and energy savings, as well as much of the overdrafted groundwater area, is the irrigated acreage in the central valley between Bakersfield and Stockton. It would be grossly unfair and poor stewardship of resources if CDFA did not provide similar opportunity for central valley farmers to receive the benefit of SWEEP. The last round of SWEEP largely shut out central valley farmers. The need and demand for a SWEEP program serving this area is high. Of the \$40 million, please allocate enough money directly to the central valley, in order to make up for the previous program shortage and cover current needs.
Julia Inestroza	Hermosa Tierra Inc.	I think both programs are great, but I would respectfully ask that SWEEP guidelines be changed to allow for entities (APNS) to apply for a second round of funding after a certain amount of time has elapsed. Technology changes rapidly, and I think a 10 year period is logical. It would allow first adopters to continue to experiment with new technologies for water and energy efficiency. Thankyou.
Justin Miller	Twin Peaks Orchards	I would recommend that HSP be available to farmers that have already used compost and cover crops and those that have already participated in the program prior... They should not be punished for already practicing or participating in HSP practices. Thank you.
Seth Myrick	Mendocino County RCD	Can a subrecipient claim the same indirect rate as the lead applicant without the same supporting documents? For example, a sub recipient is only eligible for the de minimis but the lead applicant is requesting 25% through a current grant they have with CDFA.
Seth Myrick	Mendocino County RCD	In the draft, CDFA OARS states they do not oversee use of the indirect rate, only direct costs. Does this mean CDFA will not subject a lead applicant or subrecipient to an audit showing how their indirect rates are going towards specific indirect costs?
Diana Gamzon	Nevada Count Cannabis Alliance	<p>Excluding licensed cannabis farmers from the California Healthy Soils Program undermines the program's core environmental and climate goals. Cannabis cultivation uses the same soils, water, and land base as other agricultural operations and can deliver identical benefits such as increased soil carbon sequestration, reduced greenhouse gas emissions, improved water retention, and enhanced biodiversity. Many cannabis farmers already operate at small scale and employ regenerative practices aligned with Healthy Soils objectives. Inclusion would expand climate-smart land stewardship across California without creating new environmental risks. Treating cannabis farmers equitably recognizes agriculture based on practices and outcomes, not crop type, and strengthens the overall impact of the program.</p> <p>Notably, the original statute establishing the Healthy Soils Program (SB 859) does not exempt or exclude cannabis cultivation; the current exclusion is administrative in nature rather than a requirement of state law.</p> <p>We request for an update to the program guidelines that does not exclude licensed California cannabis farmers.</p>

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		Thank you.
Veronica Pardo	Resource Recovery Coalition of California	<p>The Resource Recovery Coalition of California (RRCC) appreciates the opportunity to comment on the draft application guidelines for the Healthy Soils Program and SWEEP Block Grants funded through Proposition 4.</p> <p>RRCC is a statewide trade association representing California’s haulers, recyclers, and composters. Our members play a critical role in producing compost, biochar, and other organic soil amendments that support California’s climate, waste diversion, and agricultural resilience goals.</p> <p>1. Support for compost, biochar, and organic soil amendments as core Healthy Soils practices RRCC strongly supports CDFA’s inclusion of compost, biochar, and other organic soil amendments as eligible and encouraged practices under the Healthy Soils Program and recommends that the final guidelines continue to clearly affirm these materials as core tools for improving soil health and reducing greenhouse gas emissions.</p> <p>2. Alignment with Proposition 4 climate objectives Compost and biochar deliver well-documented climate benefits that align directly with the objectives of Proposition 4, including:</p> <ul style="list-style-type: none"> • Increased soil carbon sequestration and long-term carbon storage • Improved soil water retention and drought resilience • Reduced need for synthetic inputs and associated emissions • Enhanced soil biology and productivity <p>Biochar, in particular, offers durable carbon storage with co-benefits for soil function, making it a highly effective climate mitigation strategy when deployed through on-farm Healthy Soils projects.</p> <p>3. Advancing California’s circular economy and methane reduction goals Investments in compost and biochar application also advance California’s broader climate and resource recovery goals by creating beneficial end uses for organic materials collected through the state’s waste diversion and recycling systems.</p> <p>By supporting on-farm use of compost and biochar, the Healthy Soils Program helps close the loop between California’s organics recycling infrastructure and agricultural lands, reinforcing the state’s transition toward a circular economy while reducing methane emissions from organic waste.</p> <p>4. Supporting equitable access and regional implementation RRCC also supports CDFA’s emphasis on equity and access in the Climate Bond. Compost and biochar applications can be among the most accessible and immediately beneficial practices for disadvantaged farmers and ranchers when paired with technical assistance.</p> <p>Maintaining flexibility within the block grant structure will allow regional implementers to scale organic soil amendment use based on local agronomic needs</p>

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		<p>and material availability, while supporting participation by small and mid-scale producers.</p> <p>5. Recommendation for final guidelines To strengthen implementation and provide clarity to applicants, RRCC encourages CDFA to:</p> <ul style="list-style-type: none"> • Continue explicitly referencing compost, biochar, and other organic soil amendments as eligible and encouraged practices within the Healthy Soils Program; and • Include these practices in examples, scoring considerations, and performance indicators to ensure consistent understanding across applicants and reviewers. <p>RRCC appreciates CDFA's leadership in advancing climate-smart agriculture and looks forward to continued collaboration to ensure Proposition 4 investments deliver durable climate, soil health, and community benefits while supporting California's composting and resource recovery infrastructure.</p>
[Anonymous]		<p>In Appendix A, in the discussion of Objective 6 (pgs. 31-32), it states that "The target for each Performance Indicator is 100%." Performance Indicator 6 for this objective is "Percent of technical assistance funds spent providing assistance to SDFRs." These statements are in conflict with the statement regarding the requirements of the Canella Act (page 9), which says "Target 3: 25% of technical assistance funds will support SDFRs."</p>
Elise Timoney Jackson	SierraKind	<p>While California legalized recreational cannabis, they legalized it under the framework as a *commercial* operation as opposed to agriculture, which is where cultivating cannabis belongs. As a Farm Bureau member who runs a 15k sq foot cannabis farm, we should be included in this project. Our cannabis is grown in soil. I pay annual CA Waterboard fees. Cannabis Cultivation is agriculture and should be treated as such!</p>

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Anthony Myint	Zero Foodprint	<p data-bbox="576 304 1490 363">Thank you for the opportunity to comment. My organization, Zero Foodprint is a recipient of a prior award and I have two, related comments.</p> <p data-bbox="576 401 1490 556">Overall, because the funding is from the Climate Bond, and one main principle is "directing investments strategically to advance statewide climate priorities" such as acreage and CO2e sequestration estimates set forth in AB1757, I believe this solicitation, or future ones must factor in the applicant's plan and ability to optimize the climate benefit.</p> <p data-bbox="576 594 1490 846">To use a hyperbolic example, if two applicants were qualified/perfect and equal in all administrative and equity aspects, and one applicant's plan was to use ~\$3 million to implement 100 acres of CPS 390 Riparian Herbaceous Cover ("Convert Irrigated Cropland to Permanent Unfertilized Grass/Legume Cover Near Aquatic Habitats") their project would only sequester 63 total tons CO2e, which is a sub-optimal and potentially very irresponsible use of public funds, since the cost-effectiveness of the carbon sequestration of other projects might be ~500x as effective.</p> <p data-bbox="576 884 1490 1203">If this was a private sector program, it's possible that an applicant's plan to strategically optimize the use of funds could even be the single most important and differentiating aspect of an application, and so I think the CDFA HSP BGR program should really consider minimally including an evaluation of this plan. The "impact optimization" component of the rubric, that I envision would be quantitative and could be expressed in terms of CO2e sequestration or metrics related to water quality or conservation, biodiversity, etc. I know that Re:plan and other elements include some of this quantifiable impact tracking and my suggestion is that this should be part of the criteria for deciding which applicants are entrusted with the stewardship of state funds.</p> <p data-bbox="576 1241 1490 1396">This suggestion is in relation to matching funds or cost-share. The present guidelines state that this is not factored by the review committee: "The Technical Review Committee will not factor matching funds into application scores as that practice can disadvantage low-resource organizations in the process of building capacity."</p> <p data-bbox="576 1434 1490 1724">I respect this stance but it is my opinion that in order for the state to meet state targets around working lands carbon sequestration, there would need to be significantly more resources than currently available (about 10x what is available through Prop 4, and available on an ongoing basis). As such, I believe that at least a portion of the available funds should be used in coordination with private sector funds. Using a simple example like a compost project, a farmer might be willing to pay as much as the fertilizer would have cost--let's say that is 1/3 of the cost. A jurisdiction may be willing to pay 1/3 of the cost as part of their SB1383 procurement. In an ideal world, CDFA HSP funds could be used to fill the gap of 1/3.</p> <p data-bbox="576 1761 1490 1873">Presently the application process would not prioritize applicants who could coordinate such cost-sharing systems to leverage state funds for greater impact. This ensures low-resource organizations are not disadvantaged, but it also ensures strategic use of funds is not prioritized. A better balance would be struck by</p>

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James Craig Armstrong	Hummingbird Ranches and Thermiculture Management	<p>HUMMINGBIRD RANCHES Thermal, California</p> <p>February 5, 2026</p> <p>California Department of Food and Agriculture (CDFA) Office of Agricultural Resilience and Sustainability (OARS)</p> <p>RE: Public Comment – Draft Request for Applications (RFA) SWEEP/Healthy Soils Block Grant Programs (Climate Bond Block Grant Application Guidelines)</p> <p>To CDFA/OARS Staff:</p> <p>I am writing to provide comments on the Draft Request for Applications (RFA) for the upcoming SWEEP and Healthy Soils Block Grant programs. I farm citrus and dates in Coachella Valley, Riverside County and appreciate this opportunity to comment on the preliminary guidelines.</p> <p>I understand farmers will no longer be allowed to apply for CDFA grants directly, so our local Farm Bureau is preparing to apply on behalf of the entire Riverside County farming community which encompasses over 350,000 acres of farmland.</p> <p>The draft guidelines state a block grant recipient has to be a 501©3 organization to apply, Farm Bureau is a 501©5; would you please consider revising the guidelines to include agricultural and farmer-serving groups organized under the 501©5 classification. To best use this taxpayer investment, farmers need a path to collaborate with organizations that understand agriculture.</p> <p>In addition, the guidelines outline a new Greenhouse Gas (GHG) reduction emphasis that may not reflect the Lower Colorado River area in which I farm. Our water conservation projects rely on surface water deliveries and gravity-fed systems with limited pumping-related energy savings. As the guidelines are currently drafted, it sounds like my region will have a disadvantage due to the GHG modeling and scoring system; I urge you to reexamine these requirements.</p> <p>The farming environment in California is incredibly diverse and ever changing. We can't have one-size fits all requirements if we expect to ensure SWEEP/Healthy Soils funding supports effective water conservation and soil health objectives statewide.</p> <p>I am a proud third-generation California farmer. My farms have been sustainable for decades because I am dedicated to a holistic approach to farming that protects environmental resources while producing the safest, most nutritious fruits available. I believe it is prudent for California to invest in the future of farming with the SWEEP and Healthy Soils grants.</p> <p>Thank you for your consideration of my comments.</p> <p>Sincerely,</p>

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		<p>James Craig Armstrong Hummingbird Ranches Thermiculture Management</p>
Rachel Magos	Imperial County Farm Bureau	<p>501(c)(5) Eligibility</p> <p>We encourage CDFA to explicitly list both 501(c)(3) and 501(c)(5) organizations as eligible Block Grant Applicants, provided they meet all applicable program capacity, financial, and compliance requirements. Agricultural and producer-serving organizations organized under 501(c)(5), such as County Farm Bureaus, frequently play a central role in delivering technical assistance, outreach, and implementation support to growers, particularly in production regions where trusted, industry-based organizations are essential for effective program delivery.</p> <p>Clarifying that agricultural organizations operating under 501(c)(5) status are eligible when proposed activities align with SWEEP’s objectives, improving water efficiency, reducing energy use, and lowering greenhouse gas emissions, would provide important certainty and encourage broader participation by entities with direct, on-the-ground relationships with growers.</p> <p>We also encourage CDFA to continue supporting collaborative applications and partnerships that leverage the complementary strengths of nonprofit, agricultural, and technical organizations. In regions such as the Imperial Valley, partnerships among agricultural organizations, irrigation districts, UCANR, and technical service providers are often the most effective way to reach producers, implement projects efficiently, and ensure measurable outcomes.</p> <p>GHG Modeling and Lower Colorado River Projects</p> <p>We also wish to highlight considerations related to greenhouse gas (GHG) modeling for projects located within the Lower Colorado River region. Current modeling approaches, which rely heavily on energy-use reductions associated with groundwater pumping, do not fully reflect the realities of irrigation systems in areas such as Imperial Valley, where agriculture is only served by surface water delivered through gravity-fed systems.</p>

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Joy Merrilees	Project Ovis LLC	Allow wool as mulch or to be pelletized for compost as a natural material.
Adrian Ferrero	Biome Makers Inc.	<p>It would be great to expand the beneficiaries to private companies offering technologies to promote soil health and not just for farmers implementing a pool of practices. These private companies could become a clear driver of expansion of soil-friendly practices and the compliance process could be easily done. An example of these are the actions done by Biome Makers with the program https://fields4ever.biomemakers.com/ ... The [Program] process is clear and accurate. We would propose to expand the practices and actions to promote soil health to the extent that they can be properly demonstrated with objective metrics and add an awarding criteria of using soil-technologies for assessment and verification.</p>

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Kristin Cooper	Grant Management Associates	<p>I. Introduction and General Support</p> <p>We appreciate the opportunity to provide comments on the Draft Application Guidelines and Draft Award Procedures for the Healthy Soils Program (HSP) and State Water Efficiency and Enhancement Program (SWEEP) Block Grants, funded by Proposition 4, the Climate Bond approved by California voters in November 2024. We strongly support OARS’ continued investment in climate-smart agriculture and commend the design of a block grant structure that leverages trusted regional organizations to deliver funding and technical assistance directly to producers. The block grant model’s emphasis on local relationships, equity targets, and flexible service delivery is well-aligned with California’s climate resilience and agricultural sustainability goals.</p> <p>The approximately \$50 million for HSP Block Grants and \$34 million for SWEEP Block Grants represent a significant opportunity to scale adoption of climate-smart practices across the state. We support the two-phase Concept Proposal and Full Proposal application process, which reduces burden on applicants, and the strong focus on serving Socially Disadvantaged Farmers and Ranchers (SDFRs), Disadvantaged Communities (DACs), and Severely Disadvantaged Communities (SDACs) as required by the Climate Bond.</p> <p>The following comments are intended to strengthen the final guidelines and ensure these programs are as accessible, effective, and equitable as possible for California’s diverse farming and ranching communities.</p> <p>II. On-Farm Project Funding Caps</p> <p>Issue: The draft guidelines set per-beneficiary caps at \$150,000 for HSP (with a \$75,000 cap per practice) and \$200,000 for SWEEP. While we understand the goal of maximizing the number of producers served, these caps may be insufficient for certain operations and project types, particularly given rising costs for materials, labor, and irrigation infrastructure since these programs were last calibrated.</p> <p>Context: SWEEP projects often involve significant capital investment in irrigation system upgrades, soil moisture monitoring, and variable frequency drives. Similarly, HSP practices like biochar application—a new eligible practice in this solicitation—have highly variable costs. The \$75,000 per-practice cap for HSP may particularly constrain producers who wish to implement multiple complementary practices on the same operation, which often yields the greatest environmental benefit.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Conduct a cost analysis using data from the 2023 block grant pilot to determine whether current caps reflect actual project costs in today’s market. Adjust caps if the data supports it. • Allow BGRs flexibility to request cap waivers for projects that demonstrate exceptional environmental outcomes, particularly in severely disadvantaged communities or for operations implementing multiple complementary practices. • Clarify how biochar costs will be handled given the wide variability in biochar pricing. The guidelines note that no flat rate will be offered and that BGRs will support biochar through direct purchase or invoice—additional guidance on budget expectations for this new practice would help applicants. <p>III. Administrative Funding Cap (20%) May Be Insufficient</p> <p>Issue: The guidelines stipulate that up to 20% of each block grant award may fund Project Administration, with at least 80% directed to on-farm practices. While maximizing on-farm investment is the right goal, the 20% cap may be too restrictive for BGRs to deliver the level of outreach, technical assistance, and reporting that</p>

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		<p>the program demands—especially given the Climate Bond’s equity requirements. Context: Meeting the Climate Bond’s targets (40% of funds benefiting DACs/SDACs/vulnerable populations, 10% to SDACs, and 25% of TA funding to SDFRs) requires intensive, culturally responsive outreach, multilingual communication, and sustained relationship-building with historically underserved communities. Additionally, BGRs are required to maintain a public webpage, at public webpage, attend monthly check-in calls with OARS, conduct site visits, host demonstration field events, develop case studies, and manage complex invoicing and advance payment processes. These are substantial commitments.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Increase the administrative cap to 25% for BGRs that demonstrate a commitment to serving SDFRs and DAC/SDAC communities, recognizing that equity-focused outreach is more resource-intensive than general outreach. • At minimum, clarify what activities count as “Project Administration” versus on-farm costs. For example, if a TAP conducts a farm visit to help design an on-farm project, does that cost fall under administration or on-farm practices? Clear categorization will help BGRs plan realistic budgets. • Consider a tiered approach where the admin percentage is proportional to the number of beneficiaries served or the geographic size of the service area. <p>IV. Equity Targets and “Direct and Meaningful Benefits”</p> <p>Issue: The Climate Bond requires 40% of funds to provide “direct and meaningful benefits” to DACs and vulnerable populations, with 10% to SDACs. While the guidelines reference Appendix B for definitions, more specificity is needed on how “direct and meaningful benefits” will be defined, measured, and verified across the diverse range of block grant projects.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Provide concrete examples of what constitutes a “direct and meaningful benefit” in the context of HSP and SWEEP projects. For instance, is it sufficient for an on-farm project to be located within a DAC census tract, or must the beneficiary themselves qualify as a member of a vulnerable population? • Clarify the relationship between the 40% DAC/SDAC target and the 25% SDFR technical assistance target. Applicants would benefit from guidance on whether these targets can overlap (i.e., an SDFR in a DAC counts toward both) or whether they are measured independently. • Publish the verification methodology that OARS will use to assess whether block grants are meeting Climate Bond equity targets. This transparency will help BGRs design their outreach and selection processes to align with program expectations from the outset. • Ensure that self-certification for SDFR status is accepted, consistent with the Farmer Equity Act, so that documentation requirements do not themselves become a barrier to participation by the communities the Climate Bond intends to serve. <p>V. Incomplete Elements and Timelines (TBD Items)</p> <p>Issue: Several critical elements of the application process remain “To Be Determined,” including Q&A session schedules, concept proposal deadlines, templates, and the precise timeline for the Full Proposal phase. While we understand the guidelines are still in development, these gaps make it difficult for prospective applicants—particularly smaller organizations with limited grant-writing capacity—to plan their applications and allocate staff time.</p> <p>Recommendations:</p>

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Sarah Pruden		<p>I am writing as a grant writer supporting multiple organizations that are actively preparing to apply for the 2026 CDFA State Water Efficiency and Enhancement Program Block Grant funding opportunity. The organizations I work with include both 501(c)(3) nonprofit organizations and 501(c)(5) agricultural and labor organizations, all of which have longstanding experience delivering technical assistance, outreach, and program implementation for agricultural producers across California.</p> <p>I strongly encourage CDFA to clearly affirm and preserve eligibility for both 501(c)(3) and 501(c)(5) entities within the final SWEEP Block Grant guidelines. These entity types play a critical and complementary role in advancing SWEEP program goals. Many 501(c)(5) organizations—such as agricultural associations, irrigation-focused cooperatives, and producer-serving organizations—maintain deep, trusted relationships with growers and irrigation districts and are often the primary technical assistance providers in rural and agricultural communities. Their mission-driven focus on improving agricultural production systems and water management aligns directly with SWEEP’s objectives to increase irrigation efficiency, reduce water use, and achieve measurable greenhouse gas reductions. Similarly, 501(c)(3) organizations frequently bring strong program administration capacity, compliance expertise, and experience serving socially disadvantaged and small-scale producers. In many regions, effective SWEEP delivery depends on partnerships between 501(c)(3) and 501(c)(5) organizations, where each entity contributes distinct but essential capabilities, including outreach, engineering support, grower education, and grant management.</p> <p>Excluding or ambiguously limiting eligibility for either entity type could unintentionally reduce program reach, particularly in regions where producers rely on agricultural membership organizations or commodity-based associations as their primary source of irrigation and water management support. This could also hinder CDFA’s equity and access goals by narrowing the pool of qualified Block Grant Recipients capable of delivering SWEEP projects at scale.</p> <p>To ensure clarity, equity, and broad participation, I recommend that the final guidelines:</p> <ul style="list-style-type: none"> * Explicitly list both 501(c)(3) and 501(c)(5) organizations as eligible Block Grant Applicants, provided they meet program capacity and compliance requirements. * Clarify that agricultural and producer-serving organizations organized under 501(c)(5) are eligible when their proposed activities align with SWEEP’s water efficiency, energy savings, and greenhouse gas reduction objectives. * Encourage collaborative applications and partnerships that leverage the complementary strengths of nonprofit and agricultural organizations. <p>Clear eligibility language will provide certainty to applicants, strengthen regional delivery models, and help ensure that SWEEP Block Grant funding reaches the growers and irrigation systems where it can deliver the greatest water and climate benefits.</p> <p>Thank you for the opportunity to provide input on the draft guidelines and for CDFA’s continued commitment to effective, regionally driven water efficiency investments.</p>

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Jeana Cadby	Western Growers	<p>Western Growers (WG) appreciates this opportunity to comment on the California Department of Food and Agriculture (CDFA) request for comments on the Healthy Soils Program (HSP) Block Grant.</p> <p>WG is an agricultural trade organization representing farmers and handlers of half of the nation’s fresh fruits, nuts, and vegetables grown and sold from the states of California, Arizona, Colorado, and New Mexico. For generations, our members have provided a wide variety of healthy food choices to consumers and strongly desire to continue this endeavor.</p> <p>We strongly support the CDFA Healthy Soils Block Grant Program and recognize the critical role healthy soils play in the long-term sustainability, resilience, and economic viability of California’s farmers. Investments in soil health are essential to advancing sustainable agriculture while supporting working lands across the state.</p> <p>This grant opportunity supports the implementation of sustainable agricultural practices, and we appreciate the focus on incentivizing practices that build soil organic matter, and support soil health and measurable economic returns for California farmers. To fully realize the impact of these investments, we encourage the inclusion of several key components in the program’s design:</p> <ul style="list-style-type: none"> • The HSP should allow for a maintenance component to help ensure the longevity and continued effectiveness of longer term health practices. Ongoing support can help farmers successfully steward these practices over time and protect the public investment made through this program. • The HSP should include resources that support investments in tools for the required verification of improved soil health outcomes. Providing funding and technical assistance for new and emerging tools will help farmers validate results, build confidence in measurement approaches, and become more comfortable using soil health monitoring methods. <p>We believe these additions would strengthen the program and further support California farmers in adopting and sustaining healthy soils practices. We urge CDFA to move this grant forward and thank you for your leadership in advancing soil health and climate resilience in California agriculture.</p> <p>We are proud to work with CDFA and with farmers to collaborate and contribute the sustainable and efficient production of fresh fruit and produce for American consumers. Our farmers have demonstrated a commitment to the sustainable production of fresh fruit and produce and we are grateful for the department’s support of the agriculture industry. We look forward to continuing our work together as we develop and implement positive solutions to meet our shared goal — thriving, healthy human and environmental ecosystems and feeding the world.</p>

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Kandi Manhart-Belding	Glenn County Resource Conservation District	<p>PAGE 27 - Financial Review: OARS Requires... 3 most recent years of independent CPA Auditor's Report for Lead Applicants AND Subrecipients. For RCDs in the Sacramento Valley, we are coordinating efforts to help support each other and encouraging those RCDs whom have TA capacity to assist RCDs in building TA capacity. Not all Subrecipients will have independent CPA Auditor's Reports as they re-build. It is suggested that the Lead Applicants have this requirement and the Lead Applicant hold Subrecipients to its grant agreement requirements.</p>
Tera Lewandowski	USBI	<p>We appreciate the opportunity to provide feedback on the proposed 2026 Practice Guidelines for the Biochar Practice under the Healthy Soils Program. Should CDFA find it helpful, USBI would welcome the opportunity to serve as a resource and provide technical assistance to support the development of the updated guidelines.</p> <p>Eligibility</p> <p>We recommend that all annual and perennial cropland be considered eligible, provided that a site-specific soil assessment indicates the land would benefit from biochar application.</p> <p>Payment Scenarios</p> <p>The implementation rate for biochar should be explicitly specified as 'dry' tons/acre to ensure consistent measurement across all applications. The current payment rate may be insufficient if it is intended to cover both shipping and application costs. A more reasonable upper limit for the payment rate would be \$300–\$400/ton to account for implementation costs.</p> <p>Verification Requirements</p> <p>The reference to a "compost spreading contractor" is restrictive. Biochar can be effectively applied using a range of other application technologies including lime spreaders, injection systems, drop spreaders, and using bucket loaders for applications in trenches. We suggest amending this to the more general term, "application contractor".</p> <p>Guidelines</p> <p>On-site Production: We believe that excluding biochar produced on-site is too restrictive. The on-farm processing of woody residuals presents a promising opportunity for orchards and vineyards to manage waste and could be a key practice in California, providing soil health benefits but also reductions in air pollution compared to open pile burning. We recommend revising this provision to align with the approach used for 'Compost Scenario 2,' allowing for on-farm processing under appropriate safeguards.</p> <p>Treated Biochar Clarification: The term 'treated' biochar requires clarification. The NRCS standard states "Inoculate biochar with compost, compost tea, fertilizer or manure to balance nutrients and nutrient interactions, stabilize pH, and improve amendment moisture content to aid application". We recommend similar guidelines</p>

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		<p>for this practice and encourage treatment to be considered but not required.</p> <p>Testing Standard: Please include the full name of the recognized biochar testing standard: ANSI/ASABE/USBI S668: Methods for the Testing and Analysis of Biochar. We also recommend amending the attribution to reflect that the standard was codeveloped by the American Society of Agricultural and Biological Engineers and the US Biochar Initiative.</p> <p>Soil Response Eligibility: The provision stating that “Only Soils that show good/excellent response to biochar” are eligible is too restrictive and requires more flexible guidance. To account for field variability, we recommend changing this to accept applications on fields where "at least 75% of a field ranks as good or excellent." For fields that have been artificially drained (e.g., tilled), and where native soil type ranks low (negligible/unsuited) due to a high water table, we recommend allowing for an exception. In such cases, if the field is artificially drained but does not rank as good or excellent or good, the eligibility should be determined by examining the Hydrologic Soil Group (HSG) in Web Soil Survey. Fields with an HSG rating of A/D or B/D should be considered suitable, as artificial drainage allows these sandy soils to function with good infiltration and percolation (A or B).</p> <p>General Comment</p> <p>We strongly encourage the CDFA to address the application of blends of compost and biochar within the program guidelines. The co-application of these two amendments is considered a best management practice in many contexts, and recognizing this practice will promote holistic soil health management. We recommend that this be included as a payment option within the compost practice, similar to the payment schedules that are used by NRCS in their cost schedules.</p>

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Gregory Ray	CarbonZero.ECO, Inc.	<p>CarbonZero.ECO supports the State’s effort to scale climate-smart soil practices and appreciates the need for clear program parameters. As a supplier actively deploying biochar in California agricultural systems, we would like to offer feedback on the current 6-ton-per-acre eligibility cap.</p> <p>In our experience working with growers, soil performance outcomes are highly site-specific. In lower organic matter soils, which are common in parts of the Central Valley, application rates above 6 tons per acre can be agronomically appropriate and can materially improve water retention, soil structure, nutrient efficiency, and long-term carbon storage.</p> <p>A fixed statewide ceiling does not fully reflect the variability in soil conditions across regions. While 6 tons per acre may be sufficient in some contexts, other soils require higher application rates to reach meaningful improvements in soil function and durable carbon sequestration.</p> <p>We respectfully suggest the program consider one of the following adjustments:</p> <p>Increase the maximum eligible rate to 10 tons per acre; or</p> <p>Allow applications between 6 and 10 tons per acre when supported by documented justification, such as soil testing, carbon modeling, or a recommendation from a qualified agronomic or Technical Assistance provider.</p> <p>Providing controlled flexibility would maintain fiscal and environmental safeguards while enabling growers to implement biochar at rates that reflect actual field conditions. This approach would better align the program with both agronomic best practices and the State’s climate objectives.</p> <p>We believe a data-supported pathway for higher application rates would strengthen program outcomes and increase the long-term carbon and soil health benefits achieved per acre.</p>

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Emilie Winfield	North Coast RCDs	<p>TA costs: TA costs were insufficient for activities in the past block grant round, particularly for small projects and assistance to SDFRs who have not participated in HSP in the past. The new combined 20% cap on TA and administration begins to address this issue, but still leaves TA providers vulnerable if grant administrators allocate a larger percentage of combined funds to administration. It would be beneficial for CDFA to provide a rough guide detailing which activities are considered administrative and which activities are considered TA to support decision-making and cooperation amongst block grant administrators and TA providers and reduce the grey area between TA and admin. Without resources to support decision-making, TA providers may end up with a wide set of responsibilities and insufficient funds to cover associated time. There is also no additional funding to cover the increased TA allocation required to directly buy, transport, and spread compost/mulch/biochar for grantees, a practice that CDFA is encouraging grantees do to eliminate payment lag to farmers.</p> <p>Practice rates: Some practice payments rates have proved insufficient, especially for small projects in our region. As an example, the price per ton of compost suitable for high value crops, along with trucking and spreading is more than double the current CDFA payment rate.</p> <p>Project Verification: The block grant format can create more of a lag for farmers receiving payments as documents must be submitted to the block grant holder and subsequently routed to CDFA to review. Suggestion for CDFA to place trust in the TAP verification process. If CDFA decides it is necessary to perform the second layer of project verification, suggestion to set a limit on the timeframe CDFA has to request additional data once verification has been submitted in order to reduce payment delays.</p> <p>SDFR targets: In some counties there aren't enough farmers or acres to meet 25% allocations to underserved farmers, suggestion to consider using County specific targets based on demographics and farm size per NASS Ag Census data.</p> <p>Reporting: Some farmers still struggle to meet detailed reporting requirements. The block grant structured has simplified reporting, but further improvements would be welcome such as an application farmers can access from a cell phone to upload photos in real time. It would be great for any reporting resources to be bilingual to facilitate use by field staff.</p>

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[Anonymous]	Point Blue Conservation Science	<p>We appreciate the opportunity to comment on the program guidelines. The following includes three areas of the guidelines we are providing comments on.</p> <p>1) HSP protocols:</p> <p>The extension of HSP into a permanent block grant program provides an unprecedented opportunity for California to track ecological outcomes and benefits of healthy soils practices. Two critical missing pieces of data collection and management to maximize program impact include:</p> <p>(a) Scoring of the block grants based on the robust collection of information to monitor the impact of the HSP.</p> <p>(b) A recommendation for data sharing agreements between the block grant recipient, the land owner or grant recipient, and CDFA.</p> <p>In light of programmatic and state climate initiatives, tracking the impact of healthy soils practices on soil carbon specifically is of critical importance to evaluate targets (e.g., AB 1757). We recommend including this in the scoring of proposals to allow prioritization of projects that include a robust ecological monitoring component, as required initially through HSP. Our organization created a set of protocols that maps onto different healthy soils practices as a standard approach that could be implemented (www.pointblue.org/ag-c). Of critical importance when evaluating carbon accrual, we recommend direct measurement of soil organic carbon via dry combustion to 30cm, measurement of bulk density to 30cm, ideally collection of pre-implementation metrics, and GPS coordinates collected at each sample point, as well as other supporting indicators. Monitoring data can support assessment of the success of the practices over the course of three years, as well as contribute to evaluation of longer-term practice impacts towards climate mitigation and resilience targets.</p> <p>This intentional monitoring approach provides feedback to the land stewards, and if possible to consolidate data across block grants, would allow formation of an aggregated dataset to allow the state to adjust incentives towards most effective practices in a given region. This aggregated dataset could be publicly available, or at a minimum available for all state agencies and researchers to conduct scientific assessment, including using data for ecosystem model calibration and validation. This open-access will allow continual improvement of climate-smart and healthy soils tools, like COMET-Planner that the state relies on. Ideally the entire HSP would create a data sharing agreement that makes the data access explicit to participants, such as this example we use at Point Blue (Ag-C DSA-https://docs.google.com/document/d/1nS3LsdaMCNKA2eMUVuVBj-hxbYWFjisV/edit?rtppof=true&sd=true). These two aspects of standard rigorous monitoring before and after practice implementation, and clear objective for data sharing and use, will maximize the impact of a permanent block grant program and build trust between partners.</p> <p>2) Project administration budget:</p> <p>In our experience, a 20% cap on Project Administration is insufficient due to the substantial staff time and expertise required for scoping, detailed design, contract</p>

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		<p>management, and ongoing oversight. These efforts are critical to ensuring projects meet specifications, comply with program standards and are delivered on schedule. A cap at this level may inadvertently constrain the very activities that ensure quality, accountability, and timely completion. We suggest increasing Project Administration funding to 25%.</p> <p>If the cap cannot be increased, we suggest allowing for staff time in the 80% implementation bucket to provide technical support to producers ensuring projects are well designed and all technical assistance needs are met.</p> <p>3) Total award cap of \$4M:</p> <p>Consider increasing the award cap based on scope and scale of the proposed project and the size and proven capacity of the organization applying. Aligning award amounts to organizational capacity and proposed project complexity would maximize the impact of the HSP funding.</p>

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Peter Moller	Rubicon Water	<p>I am submitting this comment as a water technology partner with California agricultural water users in the California Lower Colorado River region, where water deliveries are governed by unique legal, hydrologic, and operational conditions that differ significantly from those in other parts of the state and are unique to this region.</p> <p>I appreciate CDFA’s commitment to ensuring that SWEEP-funded projects deliver measurable climate benefits. However, I respectfully request that CDFA further consider whether the current GHG quantification requirements may unintentionally disadvantage California Lower Colorado River water users, despite these users achieving substantial and verifiable water-conservation benefits.</p> <p>In the California Lower Colorado River region, many irrigation systems rely on gravity-fed delivery, surface-water conveyance, or pumping regimes that are already highly energy-efficient or minimally energy-dependent. As a result, meaningful investments in irrigation efficiency—such as automation, flow control, flow measurement, canal modernization, and on-farm efficiency improvements—can generate significant water savings without producing proportionally large energy or GHG reductions as calculated under existing SWEEP methodologies.</p> <p>Under the draft guidelines, projects that yield substantial reductions in applied water or system losses may score lower or be deemed less competitive solely because they do not generate high modeled GHG reductions.</p> <p>This outcome does not reflect the realities of California Lower Colorado River operations, where conserved water contributes to ensuring:</p> <ul style="list-style-type: none"> • Basin-wide shortage mitigation and improved system reliability, • Reduced pressure on overallocated Colorado River supplies, with saved water remaining in Lake Mead, • Compliance with conservation and operational requirements unique to the region <p>These benefits are real, durable, and aligned with California’s broader water resilience goals, even when they are not fully captured through energy-based GHG calculators.</p> <p>I encourage CDFA to consider additional flexibility or clarification in the final SWEEP guidelines to ensure equitable treatment of the California Lower Colorado River projects that utilize gravity-fed water supplies. This could include:</p> <ul style="list-style-type: none"> • Recognizing water conservation outcomes as a primary benefit in regions with limited energy-reduction potential • Allowing alternative or supplemental benefit metrics where pumping-related GHG reductions are inherently constrained, or not required with gravity-fed water supplies • Ensuring that scoring frameworks do not unintentionally penalize surface-water-dependent or gravity-fed systems <p>Such adjustments would help ensure that SWEEP investments remain accessible to the California Lower Colorado River water users while still upholding the program’s climate objectives. Importantly, this approach would better reflect the diversity of</p>

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		<p>California’s agricultural water systems and avoid excluding projects that deliver critical water savings in one of the state’s most hydrologically constrained regions.</p> <p>The 2022 SWEEP Southern Desert Region Pilot Program recognized this and provided \$2 Million to projects that allowed gravity-fed irrigation to be modernized without the compulsory requirement for calculating GHG emissions. These projects using Advanced Surface Irrigation, located in Palo Verde Valley, Blythe and Imperial Valley, Holtville have demonstrated significant savings of applied water of up to 30%, increasing productivity (with less water), operating with 85% Application Efficiency (AE), up to double the productivity (tons) to water applied (AF/ac) with zero GHG emissions. If these farming systems were required to use drip or spray irrigation under policy, GHG emissions would have increased.</p> <p>Thank you for the opportunity to provide comment and for CDFA’s continued efforts to design a SWEEP program that is both climate-responsive and regionally equitable.</p>

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Breanne Vandenberg	Merced County Farm Bureau	<p>California Department of Food and Agriculture C/o Office of Agricultural Resilience and Sustainability 1220 N Street Sacramento, Ca</p> <p>RE: Public Comments for HSP and SWEEP Draft Application Guidelines and Award Procedures</p> <p>To Whom It May Concern,</p> <p>Merced County Farm Bureau (MCFB) appreciates the opportunity to comment on the Healthy Soils Program (HSP) and State Water Efficiency and Enhancement Program (SWEEP) Block Grants Draft Application Guidelines and Award Procedures. MCFB is a long-standing non-governmental, grassroots, non-profit that serves to advocate for farmers, ranchers and dairy families who live and/or work in Merced County. Our organization is a dedicated 501(c)5 that was established in 1917.</p> <p>The HSP and SWEEP Draft Application Guidelines state, “Organizations such as Resource Conservation Districts (RCDs), Tribal Governments, non-profits and local agencies are positioned within agricultural communities and have existing relationships with producers. OARS wishes to leverage and strengthen these connections through Block Grants, providing flexibility to organizations to address local resource needs and build capacity and expertise.” While the above is stated in the guidelines, 501(c)5s have been left out of the conversation. We find this to be a decision that will ultimately hurt the growers they want to help as local Farm Bureaus are exactly what they outline in valid partners. We encourage this language to be reconsidered. With over 100-years in our county, Merced County Farm Bureau is a trusted partner and organization for local farmers, ranchers and dairymen that could benefit from these programs.</p> <p>MCFB encourages a change in the eligibility, and we are happy to discuss this concept further. We appreciate the opportunity to place our comments on the record. Please reach out if you have any questions or concerns.</p> <p>Sincerely,</p> <p>Breanne Vandenberg Executive Director Merced County Farm Bureau</p>

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Raymond Baltar	Sonoma Ecology Center/Sonoma Biochar Initiative	<p>We VERY much appreciate the inclusion of biochar as a fundable HSP material input and want to thank you for doing so.</p> <p>In reviewing the proposed HSP guidelines for the use of biochar we highly recommend the following:</p> <p>1) Increase or provide flexibility beyond the 6 tons per acre application cap, which seems arbitrary. Our organization managed a very successful field trial at the Oasis Vineyard in Monterey County funded by DWR that used an application rate of 10 tons per acre of biochar blended with 15 tons per acre of compost and applied it only down each vine row, so it was highly targeted at the root zone. We believe that the application rate should be determined by soil conditions, biochar type, and plant type, not some arbitrary cap. A science-based flexibility provision would ensure responsible implementation while allowing growers to tailor applications to site conditions and maximize soil carbon benefits.</p> <p>2) Allow eligibility for biochar produced onsite by experienced practitioners using flame-cap kilns or other in situ technologies. While we understand and agree with the importance of using only biochar that adheres to established quality standards, it is possible to produce high quality biochar using technologies designed for on-farm or in-forest applications. Across California, producers are investing in integrated, biochar systems that convert agricultural and forestry residues into high-quality soil amendments. These systems:</p> <ul style="list-style-type: none"> • Reduce transportation-related emissions • Improve feedstock traceability and quality control • Support circular farm nutrient systems • Promote rural economic development and innovation <p>Restricting eligibility based solely on production location may unintentionally discourage distributed and climate-efficient systems, while favoring centralized suppliers. We recommend that eligibility be based on product quality, safety, emissions compliance, and performance standards — not production location. Biochar produced onsite should qualify if it meets all applicable HSP quality and environmental criteria. Determining eligibility based on verified environmental performance rather than geographic production origin would better align with California’s climate and circular bioeconomy goals.</p> <p>We appreciate your consideration of these changes.</p>

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Jacob Taulbee	Humboldt County RCD	<p>Humboldt County RCD is planning on submitting a proposal for multiple North Coast RCDs. As we would be managing a number of counties, capping TA and Admin at 20% makes the project very difficult to achieve wide-scale success. A project manager role is necessary to manage the number of projects anticipated. Smaller acreage producers are more common in our region which means the number of projects will be much higher than elsewhere. This calls for more staff time to coordinate, verify, provide application assistance, etc. BGRs need to rely heavily on TAPs for verification and the budget to do so is too small for partner RCDs to provide that assistance. To get to a decent TAP budget we need to increase our implementation dollars to achievable levels. Many of the RCDs in our proposal have limited Ag Program staff or resources.</p> <p>Because of the low percentage for TA and Admin, the only way to achieve a reasonable Project Manager position would to apply for 2 million dollars. However, this will lead to hundreds of projects for our region because the producers have smaller farms. Reducing the minimum will allow for producers to access funding without overcommitting.</p> <p>The Draft Application Guidelines state "Common Objectives - Amplify Project Outcomes - host at least one demonstration field day and develop case studies and media materials to document the outcomes of on-farm projects." Is this a new objective from the 2023 round? Organizing an event like this requires significant time and money which is not being accounted for in the TA + Admin 20%. Case studies, as they were presented during the feedback conference in Sacramento, are pretty in-depth. Examples included videos that consultants assisted with, which costs tens of thousands of dollars. We could produce something for less but the quality would not be the same. We would be excited to put effort into this objective, but the current budget would make this more difficult to produce a product that we are proud of.</p> <p>Practice rates: Some practice payments rates have proved insufficient, especially for small projects in our rural region. As an example, the price per ton of compost suitable for high value crops, along with trucking and spreading is more than double the current CDFA payment rate.</p> <p>Reporting: Some farmers still struggle to meet detailed reporting requirements. The block grant structure has simplified reporting, but further improvements would be welcome such as an application farmers can access from a cell phone to upload photos in real time. It would be great for any reporting resources to be bilingual to facilitate use by field staff.</p>

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Navit Reid	Fibershed	<p>Pg 50: Subaward and Contractor costs: The 30% cap may unduly constrain our ability to offer technical assistance to a more diverse range of grant beneficiaries if a BGR is not able to provide the majority of TA due to staff size, location and expertise.</p> <p>In the current program we as a BGR use 33% of our TA/Admin budget towards TAPs to make sure we can support growers across as diverse geography as possible. We are a relatively small organization, so this is the only way this is possible. While we're not too far from the proposed cap, it would be helpful to have a higher cap to allow flexibility around how we work with TAPs and what geographies we serve. A cap of 40% to 50% would be more workable from our experience and discussions with other BGRs.</p> <p>-----</p> <p>I didn't see a place to submit feedback on the Practice Guidelines, so am providing them here:</p> <p>Overall, much clearer and helpful to have this information more centralized! A few things that stuck out to me:</p> <p>Compost: On-farm compost minimum temperature requirements should be clearly described. If certain types of compost are not permitted (ie vermicompost), these should be listed as well.</p> <p>Cover crop: Can a cover crop be grazed when it is terminated? It would be good to have this clarified up front either way.</p> <p>Range Planting: The 51% perennial requirement is not mentioned. Does the Native species payment scenario need to be 100% natives? This should also be clarified.</p> <p>Windbreak: The payment rate on this practice is low enough we've seen a number of producers opt out. I don't know if it's too late to re-calculate the payment rate for this one, but wanted to share this feedback just in case!</p> <p>GAP Pg 14: The quarterly invoice due date is too short - from our experience, contractors regularly take a full 30 days to send their invoices to us (even with regular badgering), so we often need closer to 60 days to complete the quarterly progress report and submit our invoice to CDFA. Also worth noting we have not always received our invoice and reporting template from CDFA in a timely manner (especially at the beginning of the grant), which delays our ability to submit our invoice on time. For this reason, a 60 day window from the end of the quarter would be a more reasonable invoicing timeline.</p> <p>GAP Pg 33: Site visits: would a TAP pre-project and/or mid-project site visit suffice? It can be difficult for BGRs to visit every project multiple times if we want geographic diversity, especially if we want to continue supporting a higher number of smaller projects/growers.</p>

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Ann Baldridge	Resource Conservation District of Greater San Diego County	<p>The current guidelines cap administrative costs, which include grant management, reporting, indirect costs, and technical assistance services at 20% of the grant total. We recommend increasing the administrative cap to at least 30% for the following reasons:</p> <ul style="list-style-type: none"> • Grant management and TA are both included in the admin budget: Lead agency time to responsibly develop and manage a block grant program, distributing and being accountable for a large quantity of implementation funding, as well as managing the subaward agreements and grant reporting takes significant time. Increasing the cap to at least 30% for these essential services will allow grantees sufficient time to manage their programs and ensure practice implementation dollars reach a wide range of producers, alongside ensuring adequate compensation for TA activities. • Regional collaboration is prioritized: We very much applaud and advocate for this approach, and would plan on applying as our regional Soil & Water Hub (which includes 6 RCDs) but 30% of a small admin budget is not enough for several regional partners to support thorough practice planning and implementation for farms in their districts. An increase on the admin cap to 30% would ensure grant partners are able to be paid adequately for their TA services. • Small farms are being served: In our region, we are typically serving small-scale producers, not large operations as in other parts of the state. San Diego is home to the most small farms (fewer than 10 acres) of any county in the nation. Our neighbors in the Inland Empire also work with many small scale or urban producers. Serving many small farms requires more individual site visits, customized planning, communication, and administrative processing per operation. Because these tasks must be repeated for each farm, staff time and travel costs increase significantly compared to working with a smaller number of large farms. We believe a 20% admin budget that includes TA is therefore inadequate and may actually be detrimental to the HSP's success. An admin cap of 30% of the grant total would support TA providers who are working with multiple, smaller properties. <p>The current guideline requires equipment to be maintained for 10 years. While we understand the intent to ensure long-term impact and accountability, we recommend revising the requirement to state: "Maintain equipment for the expected life of the product or ten years, whichever is shorter." This adjustment would better reflect the realistic lifespan of certain technologies and help reduce unintended barriers to participation. We also recommend including the ability to request a variance in cases of documented technological obsolescence. In rapidly evolving sectors, particularly irrigation and climate-smart technologies, equipment may become outdated before ten years. A variance process would provide reasonable flexibility while maintaining program integrity.</p> <p>The current guideline also requires TAP on-farm verification in addition to geotagged photos. We recommend clarifying and streamlining this requirement. Technical Assistance Providers already provide signed attestations verifying measurements, photographs, and implementation of practices, and these attestations serve as a formal compliance mechanism. Allowing flexibility by permitting either geotagged photos or TAP attestations to satisfy verification requirements would reduce duplicative documentation while maintaining accountability, particularly in cases where TAPs conduct in-person site visits. These</p>

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		adjustments would reduce administrative burden while preserving verification rigor and program transparency.

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Rowan O'Connell-Gates	Wild Farm Alliance	<p>Perennial habitat practices need structural support</p> <p>Potential issue: Diverse plantings require more planning, technical assistance, and site design. They often cost more per project but yield long-term benefits for biodiversity, water quality, and climate resilience. Thus, these practices may be deprioritized under a “spend-down” incentive structure. Suggested recommendation: Create dedicated funding tracks or scoring incentives for: Hedgerows Non-Woody Permanent Plantings (Conservation Covers, Riparian Herbaceous Cover, Contour Buffer, Filter Strips, Grassed Waterway, Herbaceous Wind Barrier, Vegetative Barrier) Woody Permanent Plantings (Alley Cropping, Windbreaks, Riparian Forest Buffer, Multistory, Tree/Shrub Establishment) This ensures these practices are not crowded out by simpler, quick-to-deploy practices.</p> <p>Language and translation accommodations</p> <p>Potential issue: Growers who do not speak English as their first language will be signing contracts and entering into agreements with potentially limited understanding. Lack of translation creates a structural barrier to participation and undermines equity goals. Suggested recommendation: Contracts, program materials, and technical guidance should be consistently available in Spanish Culturally competent outreach</p> <p>[GAP Manual Comments:] Block grant structure may unintentionally favor large growers and certain practices</p> <p>Potential issue: The current block grant structure appears to incentivize working with a small number of large growers implementing quick-to-deploy practices (e.g., compost applications and cover crops). While these practices have value, this structure may: Reduce access for small and mid-scale growers; disincentivize more biodiverse, woody, and perennial habitat plantings; and prioritize rapid fund disbursement over long-term ecological outcomes Suggested recommendation: Administrative funding should be tied not only to dollars spent, but also to: Number of growers served (BGR administrative funds increase as the number of growers increase) Acreage or linear feet of high-diversity habitat established (BGR receives more administrative funds because the practices take more effort and contain more value)</p> <p>Lack of clear payment timelines</p>

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		<p>Potential issue: The draft guidelines allow advances and reimbursements but do not specify expected turnaround times CDFA will make for: Advance payment processing Reimbursement processing Verification review → payment release This creates uncertainty for BGRs managing payments to growers. Suggested recommendation: We encourage clearer expectations for advance and reimbursement processing timelines so BGRs can responsibly manage cash flow and avoid delayed payments to producers. Commit to target review timelines or fast-track verification when grower payments depend on it. Provide contingency protocols or communication standards when payment delays occur.</p> <p>Need for predictable advance payment structure</p> <p>Potential issue: Advances are allowed but not operationally defined beyond the 25% of budget. Unclear: How often advances can be requested, Whether there is a cap on number of advances, What is the timeline of asking for advances? Suggested recommendation: Establish a predictable advance schedule (e.g., quarterly or tied to projected disbursements).</p>
Sierra Layouts	ITRC - Cal Poly	<p>The Draft Guidelines give several options for indirect cost rates. It does not explicitly state the rates established in the CSU/UC California Model Agreement (CMA) can be used by UC/CSU entities/auxiliaries. Can/should CSU/UC entities and auxiliaries use the current rate in the CMA? Is that considered a rate negotiated by the Primary Applicant in the last 5 years with another state agency?</p> <p>Is there any required breakdown of cost between administrative costs and technical assistance (listed as 20% of the total grant amount)?</p>

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J.P. Cativiela	Central Valley Dairy Representative Monitoring Program	<p>Page 7 of the Draft Application Guidelines says: "BGR Eligibility1: Public agencies, Local Agencies, 501(c)(3) Nonprofit organizations, Special Districts, Joint Powers Authority, Public Utilities, Local Publicly Owned Utilities, Mutual Water Companies, and California Native American Tribes are eligible."</p> <p>There is a reference (footnote #1) that says "defined in the Climate Bond (Public Resource Code subsection 90110."</p> <p>However, Public Resource Code Subsection 90110 states the definition as "An eligible applicant under this division is a public agency, local agency, nonprofit organization, special district, joint powers authority, tribe, public utility, local publicly owned utility, or mutual water company."</p> <p>The draft application guidelines say the nonprofit organization must have 501(c)(3) status but the Public Resource Code does not mention that nonprofits are restricted to this class of tax status.</p> <p>Limiting BGR eligibility to 501(c)(3) nonprofits ("charitable organizations") would exclude other nonprofit organizations that are in a strong position to implement Healthy Soils Program and SWEEP projects and have strong relationships with farmers and rural communities.</p> <p>For example, the Central Valley Dairy Representative Monitoring Program (www.cvdrrmp.org) is a membership organization of more than 1,100 Central Valley dairies and cattle ranches, whose members could benefit from participating in SWEEP and Healthy Soils Program projects. CVDRMP is a nonprofit 501(c)(5) organization, belonging to a class of nonprofits that are defined as "Labor, Agricultural and Horticultural Organizations." These types of organizations are often well positioned to work with farmers and rural communities on mutually beneficial projects.</p> <p>We urge CDFA to not restrict Block Grant Recipient eligibility to nonprofits with 501(c)(3) but to also allow 501(c)(5) organizations and other nonprofits to apply.</p>

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Delaney Sondag	Center for Land Based Learning	<p>As a nonprofit organization that provides agricultural education and manages a 30-acre demonstration and research farm, we are concerned that the new Block Grant structure for the Healthy Soils Program (HSP) and the State Water Efficiency and Enhancement Program (SWEEP) fundamentally changes the way organizations such as ours can access funding. Under this structure, Block Grant Recipients (BGRs) receive funds from CDFA and subsequently allocate those funds to individual beneficiaries. This model does not provide an avenue for organizations like ours to apply directly to CDFA for funding, as we have successfully done in previous program cycles.</p> <p>While we recognize that the Block Grant structure may reduce competition in a single statewide applicant pool, our organization has the administrative capacity and demonstrated experience necessary to manage state-level grants directly. We urge OARS to consider allowing organizations like us to apply directly for CDFA funding rather than going through a technical assistance provider.</p> <p>We would like OARS to consider a separate pool of funds that could be allocated to BGRs for the purpose of conducting on-farm research and demonstration projects, similar to the HSP demonstration grant that we were awarded in 2021. Across California, there are nonprofit agricultural education and research organizations that are not production farms but nonetheless play a critical role in advancing soil health research, piloting innovative practices, and demonstrating outcomes to growers. The current Block Grant framework, as written in the draft guidelines, does not clearly accommodate or prioritize this essential work.</p> <p>GAP Manual Comments: The proposed structure delays access to funding, as organizations must wait for BGRs to be selected and fully onboarded before applying as beneficiaries. This extended timeline creates a lot of uncertainty for organizations that want to apply for funding this calendar year. What sort of communication can we expect from BGRs in order to know when and where to apply for implementation funds? It creates a multi-step process vs. applying directly to CDFA for funding.</p>
[Anonymous]		<p>I think that it should a project grading rubric should be established and disseminated to all BGRs. Currently, there is no required grading rubric so many BGRs accepted projects based on first come first serve, which discriminated against smaller growers that weren't as knowledgeable about the grant application process. Creating a standardized project grading rubric would call for fairness and provide a level of equality, which the "SDFR" really does not do.</p> <p>Gap Manual Comments: Budget Breakdown Chart, \$75k practice max- I understand that CDFA wants growers to implement more than 1 practice, but I think this could be limiting for growers with more than 50 acres. If a practice max must be implemented than a \$100,000 practice max is more reasonable.</p> <p>At the current recommended max of \$75k, then a farm could only implement about 60-65 acres of 6 tons of compost per acre. This starts to discriminate against medium and large farmers.</p>

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Brian Kolodji	Kolodji Corporation	<p>There are efforts in the world to demonize the essential plant nutrient carbon dioxide (CO2). The truth is CO2 is not a pollutant. Pollutants (eg. NOX and Sulfur compounds like H2S and SOX) are poisonous as released into the environment at even low (single digit ppm level) concentrations. CO2 is naturally present at a relatively low concentration, relative to other components of the atmosphere such as nitrogen (80 v% or 800,000 ppmv), oxygen (20 v% or 200,000 ppmv), and water. CO2 at the trace 0.04 v% or 400 ppmv in the portion of the atmosphere where life exists, also known as the biosphere, is the primary ingredient for plant life to thrive via the biological process of photosynthesis. Based on decades of commercial practice and USDA (ref 1,2) and USDOE research, if the level of CO2 in a biosphere is doubled or tripled to 800 or 1200 ppmv, a practice known as carbon dioxide enrichment, plant life growth would increase dramatically (up to 200% ref 3.) Without trace levels of CO2 in the biosphere, most plant life local to the reduction or void of CO2 would cease to exist.</p> <p>The biosphere, in comparison to the mile’s high upper atmosphere where no life exists, is only a sliver of atmosphere that hugs the earth (a few 100 feet above grade) where all life exists. Carbon Dioxide Removal (CDR), of which Direct Air Capture (DAC) is the leading technology category, are technologies that remove CO2 from the atmosphere and are required to achieve carbon neutrality (ref 3). The leading CDR technology type is absorption-based DAC or aDAC. aDAC is plagued by exorbitant costs, ineffectiveness, and inability to deploy at a scale relevant to climate impact/correction (ref 4), and if it did work has the potential of doing great harm to agricultural production. aDAC strips CO2 only out of the biosphere local to the aDAC unit, and does not strip CO2 from the miles of upper atmosphere (ref 5).</p> <p>Natural photosynthesis occurring within the biosphere, per USDOE (ref 6), is estimated to remove (flux) 60 GT/Y of CO2 naturally from the biosphere alone producing biomass, a sink estimated by USDOE at 550 GT. A higher concentration of CO2 is produced in the upper atmosphere due to relatively high concentrations (at 5 to 20 v% or 50,000 to 200,000 ppmv) of industrial and power plant buoyant (having lower density and molecular weight relative to air primarily due to high water vapor concentrations) emissions globally emitted from tall vertical unimpeded stack releases and jettisoned at high velocity and temperature miles into the upper atmosphere (not the biosphere) in excess of 20 GT/Y. Overtime, the concentration in the biosphere is elevated at 1 to 2 ppmv per year due to drift of this diluted emission back into the biosphere. With Enhanced photosynthesis using carbon dioxide enrichment, this process is reversed. CO2 in the biosphere is increased to produce “green CO2 capturing machines” using agriculture that diverts the release of industrial emissions into the upper atmosphere into the biosphere. The upper atmosphere concentration of CO2 is then drawn down by the demands of CO2 in the biosphere due to the increase in biomass, in a future without industrial emissions.</p> <p>This is a request for to provide funding priority and eligibility for crop carbon dioxide enrichment technologies that use enhanced nature-based climate smart technologies to capture CO2 in the most effective, proven, scalable, deployable, and economic manner. Further, CARB needs to modify the tools based on decades of USDA and USDOE research to allow at least 10 T/Y/Acre of capture for crop carbon dioxide enrichment.</p> <p>'In 2018, Dosanjh Brothers was awarded a \$100,000 SWEEP grant to use Black sWan Free Air Carbon dioxide Enrichment (FACE) technology available through the Kolodji</p>

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		<p>Corporation and a refinery’s 200,000 T/Y CO2 emissions across the street from 50 acres of almonds to enrich the crop. With only a \$25,000 spend, a pilot plant demonstrated the ability to effectively FACE a single acre of crop with under 100 T/Y of CO2 for only a partial season (intermittent 1 week runs) over 3 years. The cost of in-orchard installed equipment for FACE of approximately 1 acre was under \$2000. The effectiveness of FACE was independently proven and validated through Kern County University of California Cooperative Extension (UCCE) through real time CO2 monitoring (dozens of analyzers throughout the orchard) a demonstrated and sustained 1200 ppmv of CO2 for the portion of orchard supplied CO2 via dry ice and natural gas firing of a small generator for 8 hours daily periods of application. These successful results were published by USDA and Kern UCCE at the 2022 ASA meeting. As the refinery asked required \$300,000 to supply the CO2, and an alternative plan at \$25,000 to use natural gas fired in a generator to provide 1000 T/Y of CO2 to 10 acres through a complete orchard season, but this plan was rejected by CDFA.</p> <p>Black sWan has developed plans in coordination with Kern County’s largest industrial emitters of CO2 and Kern County’s largest growers where the costs of installation of a 10,000 to 100,000 T/Y FACE facility would be under \$200,000 and could be scaled and deployed by 2026, with the potential of scaling throughout California to meet Governor Newsom’s goals in the 2022 CARB Scoping Plan of 7,000,000 T/Y by 2028 using only California’s almond crop. Black sWan’s (BW’s) overall goal is to enrich this the biosphere and increase global photosynthesis by over 25% to achieve 80 GT/Y DAC by enhanced photosynthesis before 2045, capturing via biomass all global industrial CO2 emissions. Black sWan technologies are the only effective DAC technologies period, and is not only deployable and scalable at levels capable of impacting/mitigating climate change, but can do so with a profit through increased yields and water savings in agricultural production (ref 3,5,7). What is meant by effective is that the science and engineering for the technology is based on decades of research and commercial practice in agriculture by large growers, the USDOE and USDA. Deployability is that it can be built quickly using minimal resources (both capital and operating) using readily available materials in large quantities requiring no large infrastructure build.</p> <p>This is a request for to provide funding priority and eligibility for crop carbon dioxide enrichment technologies that use enhanced nature-based climate smart technologies to capture CO2 in the most effective, proven, scalable, deployable, and economic manner. Further, CARB needs to modify the tools based on decades of USDA and USDOE research to allow at least 10 T/Y/Acre of capture for crop carbon dioxide enrichment.</p> <p>(1) CO2 Enrichment of Greenhouse Crops; by Enoch, H. Z. and Kimball, B. A.; 1985. (2) Controlled Environment Agriculture: A Global Review of Greenhouse Food Production; Dalrymple, D. G.; 1973 (3) Kimball, B.A., Idso, S.B., Johnson, S.M., Rillig, M.C. 2007. Seventeen Years of CO2 Enrichment of Sour Orange Trees: Final Results. Global Change Biology 13: 2171-2183: Link: Publication : USDA ARS (4) How Do Variations in Ambient Carbon Dioxide Concentration Affect Direct Air Capture Performance? (5) (64a) Enhanced Nature Based Direct Air Capture (eDAC) Scaled to 1MM Ton/ Year By 2026. AIChE (6) Carbon Cycling and Biosequestration Genomic Science Program (energy.gov) (7) The effect of long-term atmospheric CO2 enrichment on the intrinsic water-use</p>

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		efficiency of sour orange trees - PubMed Chemosphere, 2003 Jan;50(2):217-22 by S W Leavitt 1, S B Idso, B A Kimball, J M Burns, A Sinha, L Stott

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Sacha Lozano	Resource Conservation District of Santa Cruz County	<p>Appreciate and support the increased flexibility in budget allocation between admin and technical assistance, the on-going trust given to BGRs to independently approve and verify projects, the proposed two-phase application process, the inclusion of locally-defined priorities, and the proposed Common Objectives and Performance Measurement Framework to support program quality and give Block Grant Recipients clear guidance on program expectations.</p> <p>Suggestions for SWEEP guidelines:</p> <ul style="list-style-type: none"> • Update (augment) Assessment Tool to include a broader variety of options in the before and after IWM scenarios to estimate water savings. The existing options are insufficient to adequately represent many types of water use improvements that can yield savings. • Consider inclusion of project design and pump test in the list of eligible project costs. Or clarify if these can be part of the BGR's Admin/TA budget. • Clarify: "Irrigation water management or renewable energy must be less than 40% of the grant request" Does this mean 40%max each? What is included in IWM? In many cases upgrading the IWM infrastructure is all or most of what the applicant needs to achieve both water savings and GHG reduction. Capping it at 40% could result in many good projects being ineligible. • Conversion of sprinkler to drip irrigation can offer significant water savings and GHG reduction (lower pressure). How to reconcile this practice with the limits on "equipment with less than 2yr useful life" and "ensure at least 10yrs project lifespan" ...? <p>Suggestions for HSP guidelines:</p> <ul style="list-style-type: none"> • Priority to SDACs, DACs and SDFRs continues to receive a strong emphasis throughout the guidelines and in the climate bond (which I celebrate!) but there seems to persist a critical inconsistency between this priority and certain HSP program restrictions that disproportionately affect this exact demographic. Specifically, 1) the restriction on funding practices that have been previously implemented, and 2) the requirement to implement multi-year practices on the exact same acreage within the farm during 3 consecutive years. The latter is largely unfeasible for small operations with limited acreage available to accommodate multi-crop rotations. • Eligibility to receive HSP incentives should not be limited to parcels or growers that have not previously implemented a practice. I agree the program should prioritize first time adopters and lands that have not received a specific practice, but this should not prevent returning adopters from receiving some level of incentive to continue the use of valuable practices, especially if they are small and limited resource farmers from a disadvantaged community for whom any level of cost-share can make a difference and provide a "direct and meaningful benefit". <p>GAP Manual Comments:</p> <p>Very useful and complete.</p> <p>Advance payment process: Appreciate the additional detailed explanation and example!</p>

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[Anonymous]	RCD Agriculture Technical Assistance Task Force	<p>We commend CDFA’s decisions to commit to a 10-day turnaround for reviewing reports (GAP Manual Section 2.3.5) and a phased-in independent TAP practice verification process for HSP and SWEEP (GAP Manual Sections 3.6.1.1 & 3.6.1.2).</p> <p>These changes will go far to improve TAP communications with CDFA and address the long wait times for payment that many farmers have experienced.</p> <p>We do however, have some suggestions to the HSP and SWEEP Block Grants to ensure efficiency for Block Grant Recipients to meet CDFA’s program goals:</p> <p>Implementation Flexibility</p> <p>We recommend allowing TAPs greater flexibility in species selection for planting practices without requiring a formal variance process, provided selections align with NRCS technical standards and conservation guidelines. Increased flexibility would allow for regionally appropriate, site-specific implementation while maintaining conservation integrity.</p> <p>Additionally, RePlan should be aligned more closely with project guidelines to ensure consistency. Producers should not be able to select plant species that are not eligible under a given practice. Aligning system design with practice rules would reduce confusion and prevent avoidable compliance issues.</p> <p>Equipment Maintenance Requirements</p> <p>We recommend revising the 10-year equipment maintenance requirement to reflect the expected life of the product or ten years, whichever is shorter. Certain technologies, particularly irrigation and monitoring equipment, evolve rapidly and may become obsolete well before ten years. CDFA should also provide a clear variance pathway in cases of technological obsolescence to ensure the program supports innovation rather than discourages it.</p> <p>Alternatives to Geotagged Photos in Practice Verification</p> <p>Geotagged photos are often an inaccurate and inefficient method for verifying practice implementation, particularly in rural areas where metadata errors are common. We respectfully request that, in addition to photographic documentation, BGRs be allowed flexibility to perform in-person farm verifications conducted by qualified staff. This precedent is already established with NRCS for conservation practice verification and would improve accuracy while reducing administrative burden.</p> <p>Subaward and Administrative Cost Limitations</p> <p>We recommend amending the requirement that subaward and contract costs not exceed 30% of the Primary Applicant’s Project Administrative budget. Regional programs supported by RCDs, with a Primary Applicant handling administrative coordination, have been the backbone of the HSP and SWEEP Block Grant structure. This 30% limitation does not reflect how regional collaboration functions in practice.</p>

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		<p>We respectfully request removal of the 30% cap, exclusion of subawardees from the subcontractor limitation, and removal of limits on the number of subawardees. Flexibility in partnership structures is essential for effective implementation across multiple counties and agricultural systems.</p> <p>Indirect Cost Recovery</p> <p>We request that CDFA include the full menu of indirect rate options as authorized in statute across all Proposition 4 programs. Funders should avoid “reinventing the wheel” by prescribing only certain allowable cost recovery methods or disallowing expenses included in previously negotiated state-approved rates.</p> <p>Indirect cost recovery methods are already established, reviewed, and approved by the Department of Financial Services. Creating new or inconsistent requirements introduces unnecessary administrative burden and uncertainty. Additionally, proposal evaluation criteria should avoid disadvantaging RCDs and other grantees that request well-justified, transparent, and accountable indirect rates that accurately reflect their true operational costs.</p>
[Anonymous]		Please clarify - There is a discrepancy on the implementation period or maximum length of the grant term noted on RGA page 4 (3 years) and page 5 (4 years).
[Anonymous]		Please clarify – RGA page 8, Will the on-farm project selection process/protocol in collaboration with CDFA occur during the grant application phase or during the grant term? Can CDFA estimate their turnaround timeline for selection process collaboration with BGRs? If this next SWEEP solicitation has the same grant term as the pilot block grant term then any delay in launching farmer applications is a concern.

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Colleen Cecil	Butte County Farm Bureau	<p>Thank you for the opportunity to provide public comment on the 2026 Draft Climate Bond Block Grant Application Guidelines.</p> <p>We appreciate CDFA’s continued leadership in delivering Healthy Soils and SWEEP funding through the Block Grant model. The structure has proven effective in expanding access to climate-smart agriculture funding, particularly through trusted regional organizations that provide hands-on technical assistance and local program administration.</p> <p>We respectfully request clarification and consideration regarding nonprofit eligibility for Block Grant Recipients.</p> <p>The 2023 Healthy Soils and SWEEP Block Grant solicitations identified “nonprofit organizations” as eligible applicants without restricting eligibility by IRS designation (e.g., 501(c)(3)). This inclusive language allowed mission-driven agricultural membership organizations, including 501(c)(5) nonprofit associations, to successfully serve as Block Grant Recipients and deliver high-quality technical assistance and project oversight to farmers and ranchers.</p> <p>Some nonprofit organizations that have demonstrated strong administrative capacity, established agricultural networks, and deep relationships with producers are structured as 501(c)(5) agricultural associations rather than 501(c)(3) charitable entities. These organizations are nonprofit, mission-driven, and uniquely positioned to reach and serve producers, particularly small and socially disadvantaged farmers, through trusted membership networks and on-the-ground engagement.</p> <p>If the final 2026 Climate Bond Block Grant Guidelines intend to limit eligibility to 501(c)(3) entities, we respectfully request reconsideration of that limitation. Excluding other federally recognized nonprofit structures, such as 501(c)(5) agricultural organizations, could unintentionally narrow the pool of qualified applicants and reduce the program’s reach into agricultural communities. We recommend that the final guidelines retain broad eligibility language for “nonprofit organizations” without restricting IRS classification.</p> <p>Maintaining inclusive nonprofit eligibility would align with the successful 2023 Block Grant Pilot model and ensure that CDFA continues to leverage the full range of trusted agricultural partners capable of delivering climate-smart funding efficiently and equitably.</p> <p>Thank you for your consideration and for your ongoing commitment to California’s farmers, ranchers, and climate goals.</p>
[Anonymous]		<p>Regarding the draft GAP Manual page 14 - Please consider increasing the invoice due dates to 60 days after a quarter ends instead of 30 days. As a current block grant recipient we work with partner organizations that need board approval before submitting invoices to us. With their board meetings being once monthly (with occasional "dark" months) the 30-day post-quarter due date will be extremely challenging to meet. By allowing 60 days after a quarter ends this helps BGRs cater to the unique situations of their grant partners, and reduces unreasonable partner</p>

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		<p>expectations. This suggestion is a compromise from the current 90-day post-quarter invoice due date expectation.</p>
Kasey Butler	RCD Monterey County	<p>We commend CDFA’s decisions to commit to a 10-day turnaround for reviewing reports (GAP Manual Section 2.3.5) and a phased-in independent TAP practice verification process for HSP and SWEEP (GAP Manual Sections 3.6.1.1 & 3.6.1.2).</p> <p>These changes will go far to improve TAP communications with CDFA and address the long wait times for payment that many farmers have experienced.</p> <p>We do however, have some suggestions to the HSP and SWEEP Block Grants to ensure efficiency for Block Grant Recipients to meet CDFA’s program goals</p> <p>Implementation flexibility</p> <ul style="list-style-type: none"> - Allow TAPs flexibility in species selection for planting practices without applying for a variance, in alignment with NRCS guidelines. - Adjust Replan to match project guidelines - producers should not be able to select plants that are not allowed in a given practice. - Equipment maintenance for 10 years - Change to expected life of product or ten years, whichever is shorter. Provide the ability to request a variance in the case of technological obsolescence. <p>Offer alternatives to Geotagged photos in practice verification Geotagged photos are often inaccurate and inefficient means of verifying practices. In addition to geotagged photos, please allow for BGRs the option or flexibility to perform in-person farm verifications. This precedent is already used with NRCS to confirm practice verification</p> <p>Amend the requirement that subaward and contract costs cannot exceed 30% of the Primary Applicant’s Project Administrative budget. Regional programs supported by RCDs with a Primary Applicant handling administration has been the backbone of the HSP/SWEEP block grant program. Please remove this 30% limit or exclude subawardees from the subcontractor budget limitation. Please remove the limit on the number of subawardees.</p> <p>Allow Variability of Indirect Rates Include the full menu of indirect rate options as written in the law in all Prop 4 programs. Avoid “reinventing the wheel” or prescribing only certain allowable cost recovery methods. This includes disallowing expenses in previously negotiated state rates. (Cost recovery methods are already prescribed, approved, and required by the Department of Financial Services. It is imperative that funders do not create new requirements or restrictions.) Avoid disadvantaging RCDs and other grantees who request well-justified, transparent, and accountable indirect rates that reflect their true costs when evaluating proposals</p>

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[Anonymous]	Ventura County Resource Conservation District	<p>On behalf of VCRCRD and the Central Coast RCD Soil Hub we'd like to thank CDFA for continuing to support farmers with implementation of climate smart practices and for encouraging/funding regional partnerships helping farmers. Our main concern about this Draft RGA is informed by our experience as a current block grant recipient and technical assistants for both the SWEEP and HSP programs.</p> <p>Please consider amending Draft RGA page 50 budget rule where a maximum of 30% of the Project Administration Budget can go to subaward and contract costs.</p> <p>Let's review this rule's limitations with a HSP block grant example. Project specs: \$3M total budget over a 4-year grant term where there is 1 primary applicant and 3 subrecipients (which is on the low end), the average hourly rate including fringe is \$100/hour (low estimate), and the distribution of on-farm projects is assigned equally across all 4 organizations with the average project at \$100,000 (high estimate for HSP, especially for SDFRs). Each of the 3 subrecipients could receive a maximum total of \$60K (600 hours). Based on our current experience and this draft RGA's expanded subrecipient reporting requirements, nearly half of the available hours for the subrecipient would be spent on initial CDFA trainings, monthly CDFA meetings, monthly internal partner meetings, subrecipient invoicing, planning outreach and demonstration events, and case studies. Then after the application phase the subrecipient would be left with a generously estimated 250 hours to work with their assigned on-farm project beneficiaries (in this example is 6 projects per RCD) across 4 years, which is equivalent to ~11 hours annually per on-farm project. With 11 hours annually they must complete required verification and soil sampling site visits, one-on-one practice implementation assistance, vendor coordination, document gathering, practice reporting to CDFA, project modifications, and more for one project. It is not unreasonable to spend 8 hours in one month assisting one farm during their implementation of one practice. Where on-farm projects have multiple practices, this adds additional time needed for one-on-one trainings and site visits. Also consider working with more SDFRs and vulnerable populations has historically meant additional translation services, more implementation assistance needed, and smaller project sizes (thus more total projects needed to reach financial goals). These calculations don't even factor in subrecipient indirect, travel, or TA supply costs.</p> <p>We understand this 30% rule is to discourage non-eligible organizations from doing the majority of BGR work. Inadvertently this rule will discourage partnerships and even discourage groups from applying at all. A real risk for subrecipients is they will run out of funding 2/3s of the way through the grant term and then the primary applicant will have to pick up all of the remaining work crossing their individual service area boundaries to cover the entire BGR service area. This change mid-grant breaks down farmer relationships and trust.</p> <p>A possible alternative to the draft language is "No more than 30% of the 'Project Administration Budget' can be allocated to subrecipients who would not be eligible to serve as Block Grant Recipients on their own." This would allow, for example, a group of Resource Conservation Districts to more equitably split their TA funding (thus time dedicated to farmers) across the individual service areas instead of concentrating the majority of available time/personnel funding to only the primary</p>

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		<p>applicant's service area. Please consider allowing the primary applicant and subrecipients (who are all also eligible BGR org types) to determine the best percentage breakdown for the total Project Administrative Budget based on their unique context. Allow the detailed application budget requirements for both the primary applicant and subrecipients to justify the asks.</p> <p>GAP Manual Comments: Regarding page 17 section 2.2.2.1.5 - the current Time and Activity reports require separate daily notation of hours spent on TA and Admin for each staff member. Filling this out is unnecessarily time consuming and additional work on top of standard organizational payroll timesheets. Please consider adjusting the T&A reports to ask for summarized monthly hours spent on TA and Admin activities per individual.</p>

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Konner Simpson-Johnson	Bowman Environmental Consulting	<p>Thank you for the opportunity to provide comments on the proposed SWEEP & HSP application guidelines. We respectfully offer the following recommendations for consideration:</p> <p>We recommend that CDFA increase the cap on subaward and contract costs under the Project Administration budget category from 30% to 50%. Many counties across California face significant challenges due to underfunded or underactive Resource Conservation Districts (RCDs) and limited access to University of California Cooperative Extension (UCCE) personnel. Given the state’s commitment to portfolio balancing and ensuring equitable service to disadvantaged and severely disadvantaged communities, it is counterproductive to impose strict limits on the ability of non TAP eligible entities to provide essential technical assistance and administrative support.</p> <p>Acting as private sector TAPs, Bowman (formerly Blankinship & Associates) has helped distribute nearly \$5 million in 15 California counties to growers for on farm irrigation improvements and renewable energy upgrades since 2016. These efforts have resulted in annual savings of 25,220 acre inches of irrigation water and reductions of 1,987 tons of CO₂e in greenhouse gas emissions, annually. This track record demonstrates the critical role that private sector qualified professionals can play.</p> <p>We strongly urge CDFA to recognize and allow the continued participation of private sector professionals with demonstrated expertise in these programs as an additional pathway through which Block Grant Recipients may meet program requirements. Expanding access to these qualified partners will help ensure high quality support for farmers and ranchers while maintaining the effectiveness, equity, and reach of CDFA’s climate smart agriculture initiatives.</p>
[Anonymous]		<p>Regarding the HSP practice guidelines sheet linked on GAP Manual page 32 - many one-time planting practices note verification requirements at the end of the grant term. Please clarify, does this mean the farmer will not receive any money until the end of the grant term? Will farmers be allowed partial payment for verified installation/establishment and then remaining payment at the end of the grant term to ensure survivorship? Please consider that SDFRs and vulnerable populations are more often in need of financial resources to support upfront costs. Waiting 3-4 years for full payment may discourage implementation of these practices all together.</p>

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[Anonymous]		<p>We are very pleased to see some changes to the Block Grant program guidelines, specifically:</p> <ul style="list-style-type: none"> • A 10-day turnaround for reviewing reports • A phased-in independent TAP practice verification process for HSP and SWEEP • Allowance of 20% of funds to go to a combination of TA and admin, without a restriction on how those are allocated <p>We also deeply appreciate that CDFA has been one of the only State agencies to allow a reasonable 25% indirect cost rate, and are also pleased that this round (Prop 4 funds) will offer even greater flexibility in those rates.</p> <p>Suggestions on the Draft Application Guidelines:</p> <p>Practice Implementation</p> <ul style="list-style-type: none"> • Allow TAPs/producers flexibility in species selection for planting practices without needing a contract modification. It should not be a problem to swap out one native shrub for another if the originally planned plant is not available or producer preference changed. • The RePlan should follow practice guidelines, i.e. if it is required that 51% of a hedgerow be woody species, RePlan should not let producers or TAs choose 90% forbs. This is a chronic source of inefficiency and confusion. • Ensure that the practice guidelines available to BGRs, TAPs and producers contain ALL necessary information about practice requirements. • The compost practice, which requires a small amount of compost be applied for 3 consecutive years, is impractical and does not reflect standard agricultural practice. A single, larger application in one year would be vastly preferred, and can be limited to a ton/acre maximum that will not pose any threat of nitrate leaching. <p>Offer alternatives to Geotagged photos in practice verification Geotagged photos are often an inaccurate and inefficient method for verifying practice implementation, particularly in rural areas where metadata errors are common. The apps are glitchy and nearly always lose their geographic info when transferring photo files. BGRs should be allowed flexibility to perform in-person farm verifications conducted by qualified staff. This precedent is already established with NRCS for conservation practice verification and would improve accuracy while reducing administrative burden.</p> <p>Amend the requirement that subaward and contract costs cannot exceed 30% of the Primary Applicant’s Project Administrative budget This requirement severely limits the number of counties (and producers) a single BGR can serve, creating unnecessary inefficiency. This would essentially mandate that the BGR conduct the vast majority of its own TA. The most efficient Block Grant programs are housed and administered in one office, with a wide network of TAs in multiple counties. We respectfully request removal of the 30% cap, exclusion of subawardees from the subcontractor limitation, and removal of limits on the number of subawardees.</p> <p>Allow Variability of Indirect Rates Please include the full menu of indirect rate options as written in the law in all Prop</p>

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		<p>4 programs. Avoid “reinventing the wheel” or prescribing only certain allowable cost recovery methods.</p> <p>General comments</p> <ul style="list-style-type: none"> • CDFA staffing: Though HSP is a soils program, many of the practices it implements are planting practices, which require expertise in plants. It seems that most CDFA HSP staff are soils experts, and have a difficult time fielding plant questions. We suggest including staff with native plant background, as well as rangeland science and crop science background. • TAP trust: There is often a general feeling of mistrust from CDFA program guidelines and staff. We empathize with the inherent difficulty in providing TA funds or producer cost share assistance to people and places CDFA staff cannot physically be. But this is something that ALL granting agencies face, and they eventually have to trust the groups they have funded. We suggest following similar guidelines for project design and verification as NRCS does, which would save significant staff time on both sides and reduce the "back and forth" on project details.
[Anonymous]		<p>For specific practices, make it clear whether the guidelines are required or not. My current understanding is that in order to get paid and verified, you just need to do everything in the verification column, which doesn't always include everything from the guidelines column. For example, for hedgerow planting, guidelines indicate that there should be plant protection, irrigation, and the width should be 15ft wide, but that is not required in the verification. For the compost application practice, applicants should not have to indicate their C:N ratio until after they do soil testing and know their soil nutrient needs.</p>