

## ENVIRONMENTAL FARMING ACT SCIENCE ADVISORY PANEL (EFA SAP) CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE

### **PUBLIC MEETING AGENDA**

January 13, 2022 9 AM to 4 PM

### **REMOTE ACCESS**

Registration

https://us06web.zoom.us/webinar/register/WN\_Ww12A6TMR1CuLav6ryRumw Webinar ID 881 4580 1230

Presentation materials will be posted at the following link prior to the meeting: https://www.cdfa.ca.gov/oefi/efasap/meetings\_presentations.html

Торіс	Presenter	Action Level
EFA SAP and CDFA Introductions	Chair Dlott	Informational Item
2. Minutes from Previous Meeting	Chair Dlott	Action Item Requires EFA SAP Approval
Updates to the Ecosystem Services     Definition	Liaison Gunasekara, CDFA	Action Item Requires EFA SAP Approval

Liaison to the EFA SAP, Dr. Gunasekara will provide an update to EFA SAP members and public stakeholders on an updated definition of "ecosystems services" for adoption. The existing <a href="Ecosystem">Ecosystem</a> <a href="Services definition">Services definition</a> was adopted in 2012 and a recently passed motion in a previous EFA SAP meeting requested CDFA staff to revisit and update the definition.

Enhancement Program (SWEEP); Steph Jamis, CDFA SWEEP Informational Item Updates	4.	,	Steph Jamis, CDFA SWEEP	Informational Item
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The SWEEP solicitation for applications opened on October 19, 2021 and will close on January 18, 2022. Presented will be an update on the solicitation application process including number of applications submitted and awards made. SWEEP was allocated \$50 million for this solicitation for Fiscal Year 2021-2022. <a href="https://www.cdfa.ca.gov/oefi/sweep/">https://www.cdfa.ca.gov/oefi/sweep/</a>

5. SWEEP Pilot Project

Scott Weeks, CDFA SWEEP

Action Item (proposed water only pilot program)

Requires EFA SAP Approval

CDFA will present information on a proposed new framework for a pilot program that attempts to quantify water savings only with no additional increases in greenhouse gases from irrigation projects in the Southern California desert region. The EFA SAP will be asked to review the framework presentation and decide if to move this pilot program to the next stage of releasing a draft request for applications for public comment following the meeting.

6. Water Efficiency Technical Assistance Program (WETA); Updates

Scott Weeks, CDFA SWEEP

Informational Item

The Budget Act of 2021 appropriated \$5 million to CDFA for irrigation water efficiency and nutrient management technical assistance grants. The Water Efficiency Technical Assistance (WETA) grant program is designed to facilitate technical assistance to agricultural operations for on-farm irrigation water and energy use efficiency and nutrient management. The WETA solicitation for applications opened on November 22, 2021 and will close on January 19, 2022. Presented will be an update on the solicitation application process including number of applications submitted.

https://www.cdfa.ca.gov/oefi/technical/weta.html

7. Technical Assistance Program; Updates

Carolyn Cook, CDFA SWEEP

Informational Item

An update on the Technical Assistance Program for Climate Smart Agriculture will be provided. <a href="https://www.cdfa.ca.gov/oefi/technical/">https://www.cdfa.ca.gov/oefi/technical/</a>

8. Healthy Soils Program; Updates

Nina Bingham, CDFA HSP Elizabeth Hessom, CDFA HSP

Informational Item

The meeting complies with Bagley Keene requirements and the Governors Executive Orders on Covid-19 which allows for remote participation and voting by EFA SAP members at public meetings. Questions regarding this public meeting can be directed to Amrith Gunasekara, PhD, at (916) 654-0433 or <a href="mailto:CDFA.OEFI@cdfa.ca.gov">CDFA.OEFI@cdfa.ca.gov</a> More information at: <a href="http://cdfa.ca.gov/Meetings.html">http://cdfa.ca.gov/Meetings.html</a> and <a href="http://www.cdfa.ca.gov/EnvironmentalStewardship/Meetings">http://www.cdfa.ca.gov/EnvironmentalStewardship/Meetings</a> Presentations.html

The Healthy Soils Program (HSP) Incentive Program is currently accepting applications as part of a \$75 million Fiscal Year 2021-22 allocation. The Incentives solicitation for applications opened on November 1, 2021 and will close on February 25, 2022. The Demonstration Projects application period was from November 1, 2021 through December 31, 2021. Presented will be an update on the solicitation application process including number of applications submitted and awards made.

https://www.cdfa.ca.gov/oefi/healthysoils/

9. Pollinator Habitat Program Carolyn Cook, CDFA PHP Informational Item

The Pollinator Habitat Program (PHP) is a proposed new program focused on incentivizing pollinator habitat on farms and ranches. CDFA will present information the funding appropriation and discuss the framework under consideration. CDFA received \$15 million for this program in Fiscal Year 2021-2022.

10. Conservation Agriculture Planning Grants Program (CAPGP); Updates

Carolyn Cook, CDFA CAPGP Informational Item

The CAPGP is a new program under CDFA Climate Smart Agriculture portfolio and allows for planning grants so agricultural operations in California can plan for climate change mitigation and adaption activities. CDFA received \$17 million for the CAPGP for Fiscal Year 2021-22. CDFA received a second round of public comments on the Draft Request for Proposals for the Conservation Agriculture Planning Grants Program between September 16 and October 19, 2021. Presented will be the <u>public comments</u> and <u>CDFA responses</u> to those comments which are now posted on the <u>program website</u>. Summarized public comments and CDFA responses are also included in the <u>Binder of Information</u> for this meeting. CDFA is currently working internally on a cost for the carbon farm plans prior to releasing the solicitation for applications. <a href="https://www.cdfa.ca.gov/oefi/planning/">https://www.cdfa.ca.gov/oefi/planning/</a>

11. Public Comment Chair Dlott Informational Item

12. Next Meeting – April 14, 2022 Chair Dlott Informational Item

### **EFA SAP MEMBERSHIP**

### https://www.cdfa.ca.gov/oefi/efasap/

Jeff Dlott, PhD, Landscan, Member and Chairperson
Vicky Dawley, Tehama RCD, Member and Vice Chairperson
Don Cameron, Terranova Ranch, Member
Judith Redmond, Full Belly Farm, Member
Leonard Diggs, Pie Ranch, Member
Keali'i Bright, California Department of Conservation, Member
Amanda Hansen, California Natural Resources Agency, Member
Scott Couch, State Water Resources Control Board, CalEPA, Member
Michelle Buffington, PhD, California Air Resources Board, CalEPA, Member
Greg Norris, USDA Natural Resources Conservation Services, Subject Matter Expert
Doug Parker, PhD, Subject Matter Expert

# **AGENDA ITEM 1**

# AGENDA ITEM 2

### CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE (CDFA) ENVIRONMENTAL FARMING ACT SCIENCE ADVISORY PANEL

California Department of Food and Agriculture Remotely Hosted to Accommodate Covid-19 Safety Measures

> October 14, 2021 9 AM to 3 PM Remote Access

https://www.cdfa.ca.gov/oefi/efasap/meetings\_presentations.html

### **MEETING MINUTES**

### **Panel Member in Attendance**

Jeff Dlott, LandScan (Chair and Member, In Attendance)
Vicky Dawley, Tehama RCD (Vice Chair and Member, In Attendance)
Michelle Buffington, PhD, CalEPA, California Air
Resources Board (Member, In Attendance)
Scott Couch, CalEPA, State Water Board, (Member, Kelsey Moore, Environmental
Scientist from SWRCB, in attendance for Scott Couch)
Don Cameron, Terranova Ranch (Member, In Attendance)
Leonard Diggs, Pie Ranch (Member, In Attendance)
Keali'i Bright, DOC (Member, In Attendance)
Amanda Hansen, CNRA (Member, In Attendance)
Judith Redmond, Full Belly Farm (Member, In Attendance)
Greg Norris, USDA NRCS (Subject Matter Expert, In Attendance)
Doug Parker, PhD, UC ANR (Subject Matter Expert, In Attendance)

### **State Agency Staff and Presenters**

Amrith Gunasekara, PhD, CDFA Geetika Joshi, PhD, CDFA Emily Zakowski, CDFA Scott Weeks, CDFA Carolyn Cook, CDFA

### **AGENDA ITEM 1 – Chair and Member Introductions**

The public meeting of the Environmental Farming Act Science Advisory Panel was called to order at 9:02 am by Chair Dlott. The Panel members introduced themselves. A quorum was established.

### **AGENDA ITEM 2 – Minutes**

The Panel reviewed the minutes from the previous meeting, held in July 2021. Member Cameron introduced a motion to approve the minutes. Member Buffington seconded the motion. The motion was approved by all.

### AGENDA ITEM 3 – Office of Environmental Farming and Innovation; Updates and Ecosystem Services Definition

Dr. Amrith Gunasekara from CDFA indicated that OEFI was not ready to give an update on the ecosystem services definitions at this time. Dr. Gunasekara proposed that to facilitate this process, he will be working with Member Diggs and other members and create an updated definition and bring that to the next meeting for consideration and adoption. Chair Dlott volunteered to help with this process.

Dr. Gunasekara gave an update to the panel on the amount of funding allocated to OEFI this year.

He indicated that any new programs developed as a result of the funding will be brought before the Panel during development. For the State Water Efficiency and Enhancement Program, \$100 million was allocated between 2021-2023 through General Funds. The SWEEP solicitation will be released soon, and CDFA staff will discuss SWEEP public comments later during this meeting. Since 2014, \$80.5 million has been awarded through SWEEP, totaling in 828 projects. In addition, five percent or no less than \$5 million will be used for technical assistance grants. The amount appropriated is available for encumbrance until June 30, 2023. Chair Dlott asked a question in regard to having enough staffing to account for the additional funds. Dr. Gunasekara indicated that the SWEEP program staff would not be expanding because these are one-time funds and not continuous appropriations. To help with and distribute the workload, the application window is being expanded from 2 months to 4 months and will be a first come first serve process.

The Healthy Soils Program was allocated \$160 million between 2021-2023 from General Funds and CCI funds. Since 2017, \$40.7 million has been awarded to the HSP, totaling in 657 projects. The amount appropriated is available for encumbrance or expenditure until June 30, 2023 and liquidation until June 30, 2027. Member Redmond asked a question in regard to having enough staffing to account for the additional funds. Dr. Gunasekara indicated that the HSP staff would not be expanding because these are one-time funds and not continuous appropriations. To help with the workload, the application window is being expanded to 4 months, and will be a first come first serve process. Member Redmond indicated that she reviewed the public comments and wanted to flag that there were several letters flagging staffing delays. Chair Dlott indicated that this topic will be discussed more in depth during the HSP agenda item.

The Alternative Manure Management Practices Program was allocated \$80 million between 2021-2023 in General Funds. Since 2017, \$68.3 million has been awarded, totaling in 116 projects.

The Conservation Agriculture Planning Grants Program was allocated \$39 million between 2021-2023 in General Funds. Member Redmond asked how the \$7 million for organic transition will be handled. Dr. Gunasekara indicated that the funds will be used for the organic transition plans first, and any remaining funds will be used on other project practices.

The Pollinator Habitat Program was allocated \$30 million between 2021-2023 in General Funds. Dr. Gunasekara indicated that this is currently housed under the "Biodiversity" branch in OEFI. An additional \$10 million allocation will go towards research work. An allocation of \$5 million was awarded to go towards Technical Assistance to assist farmers and ranchers with on-farm water efficiency needs.

The new Cannabis Appellations Program is in the process of developing rulemaking for this program, and there was an allocation of \$9 million in General Funds to implement a cannabis pilot project. Currently cannabis is not an eligible crop to be funded in OEFI incentive programs.

AGENDA ITEM 4 – Conservation Agricultural Planning Grants Program (CAPGP); Updates Presentation by Emily Zakowski from CDFA. The program is currently in its second round of public comments. Ms. Zakowski presented on the background of the program, applicant eligibility, and public comments. Ms. Zakowski provided a summary of public comments; 84 total were received, 42 were unique, and 10 comments were accepted. Key changes covered a number of topics including expanding eligible applicants, and applications being on a competitive basis. Dr. Gunasekara followed up to clarify that they are still determining the costs for the development of carbon farm plans. He indicated that the cost caps specified in the request for grant applications might increase if needed to account for the costs of the carbon farm planning work.

Expert Norris asked to review the different CAPs possible and asked what the \$7 million would focus on. Dr. Gunasekara clarified that the funding will go towards supporting organic system planning (CAP 138). It was also clarified that if all the \$7 million is not spent towards organic system

planning (CAP 138), it will go towards other planning activities. Expert Norris commented on USDA NRCS' experience working with these plans. He indicated that there is more interest in other plans like irrigation management, and grazing management plans. He indicated that with regulations like SGMA there will be more interest in funding for the development of mandatory plans.

AGENDA ITEM 5 – State Water Efficiency and Enhancement Program (SWEEP); Updates - Presentation by Scott Weeks from CDFA. Dr. Gunasekara introduced the State Water Efficiency and Enhancement Program. Dr. Gunasekara noted that public comments are now posted online. Mr. Weeks provided an update on the funding timeline for the solicitation release – the solicitation is expected to be released October 2021 and have a 4-month review period. Mr. Weeks presented an overview of the major changes to the draft request for grant applications for the program including first-come, first-serve application review, addition of priority populations, addition of sub-surface drip irrigation of manure effluent practice, funding cap increase to \$200,000, and some changes to additional considerations. Mr. Weeks discussed the review process for grant acceptance including the administrative review and technical review. Mr. Weeks shared other information on the program requirements. Dr. Gunasekara commented in regard to public comment on the increased cap in that it will decrease the number of grants and help with administrative functions.

Member Redmond inquired about application amount and number, noting that it is the goal to facilitate all grants do not limit the number of grants. Member Redmond also noted the Technical Assistance Providers had comments that the rolling application process is not conducive for small farms and financially disadvantaged farmers. Expert Parker questioned if rolling applications won't be a problem with the large budget increase, this may address the issue. Member Buffington provided a comment on options for dealing with equity in grant application process and suggested a lottery system which would remove the time constraint. Dr. Gunasekara noted that the funding for 2021-2022 is unprecedented and CDFA is addressing the increase in funding with the longer application window and rolling application process which will help the technical assistance providers, grant applicants, and CDFA staff. Expert Parker suggested that CDFA looking at allocations when halfway through funding and assess the equity of granted projects. Dr. Gunasekara noted that CDFA will be looking at equity and funding during the entire application period due to certain program requirements.

Member Diggs suggested CDFA needs to expand in-reach to disadvantaged communities using technical assistance providers to maximize impact. Chair Dlott asked if CDFA tracks success of technical assistance providers on the grants they assist with. Dr. Gunasekara indicating yes to the tracking of technical assistance providers, and also added that CDFA is working with technical assistance providers to increase the technical assistance response time. Member Hansen flagged for the group that the natural and working lands climate smart strategy has been released and has recommendations for how to scale implementation, especially related to regional technical assistance/capacity. Member Cameron inquired about the potential to link or list technical assistance providers within the application to facilitate connection to assistance. Dr. Gunasekara thanked Member Cameron for this suggestion and stated that CDFA will follow through on this suggestion.

Member Redmond indicated she was happy to hear that the funding has increased for this round and inquired about non-CCI funding allocation that may be able to be used more freely to address equity issues. Member Redmond suggested an ad-hoc subcommittee to look at General Fund use to address equity issues in climate-smart ag programs.

Chair Dlott requested to close the discussion on the rolling application and added that this year is a pilot trial for working with the large budget increase.

Member Redmond inquired about the categorizing of rolling applications as an informational item. Chair Dlott stated that the role of the committee is not to detail program functionality, but to discuss

framework of these programs. Dr. Gunasekara agreed with the role of the committee and overview suggestions that CDFA can follow up on. Dr. Gunasekara stated these changes would be run by the Secretary but not put out for another 30-day public comment period because of urgency in getting the funding allocated for SWEEP and HSP. Dr. Gunasekara stated that the grant agreements should be signed by June 30<sup>th</sup>, 2022. Member Redmond thanked CDFA for their responsiveness to public comment and the committee suggestions but emphasized that the technical assistance and community groups have to have their comments be listened to and considered at some point.

Chair Dlott stated the importance of this discussion and emphasized the flexibility on addressing the public comments. Member Hansen asked Dr. Gunasekara how CDFA will address public comments that came in and how they will be incorporated into the programs. Dr. Gunasekara replied that public comments that can be easily incorporated are included in this year's solicitation but comments which require further work are explored and incorporated into later solicitations if found possible. Member Hansen requested a reminder for the scope of the panel's engagement. Dr. Gunasekara clarified that the framework of these grant programs is run through the Science Panel and when major changes are voted through, these changes are then run by the Secretary and incorporated.

Chair Dlott summarized the state of the conversation around public comment suggestions including rolling admission and removal of GHG requirements. Member Dawley stated that they are reluctant to drop GHG requirements from the SWEEP program given today's climate crisis. Member Cameron agreed with Member Dawley. Chair Dlott would like Expert or Liaison input on GHG requirements. Expert Parker explained there are no GHG savings with surface water currently and that the logistics for assessing this are complicated but could be evaluated. Member Cameron described a drip system example from Imperial Valley as one desert program that did fit well in SWEEP. Dr. Gunasekara added to Member Parker's comments by remarking water savings and GHG savings are limited to the grantee's farm boundary because these savings are difficult to calculate at larger scales. Chair Dlott ended the discussion and moved to address the next agenda item.

### AGENDA ITEM 6 – Healthy Soils Program (HSP); Updates

Dr. Joshi greeted members and provided an overview on next steps, proposed HSP updates, and public comments on the Healthy Soils Program but emphasized the team is still working on the responses to these comments. Dr. Joshi provided updates to the Healthy Soils Program including eligibility and exclusions, program requirements, project verification requirements, CDFA HSP RePlan Tool, Comet Planner Tool, Electronic Application Platform, Incentives Program payment rates, and changes to outreach requirements and types of demonstration projects. Dr. Joshi stated draft request for grant applications was available for public comment September 9 – September 23<sup>rd</sup>, 2021 and will provide the committee an overview of the received public comments.

Dr. Joshi provided an overview of public comments that pertained to both incentive and demonstration projects which addressed eligibility, practices, program requirements, scope, funding, reporting, and miscellaneous. Dr. Joshi also described suggestions to program requirements including clarification on practices, additional practices added, and reducing reporting requirements or making reporting requirements to be more flexible. Dr. Joshi also highlighted requests for translation of program materials into other languages, regional variation in costs, invest in state technical support to farmers. Dr. Joshi also covered comments specific to incentive programs. Dr. Joshi mentioned demonstration specific comments which involved potential extension of projects to 3-4 years, additions of new practices, allowing Type A demonstration projects to only cover potential practices, clarification and reduction of outreach requirements, clarification on past performance evaluation for grantees.

Dr. Joshi outlined HSP next steps which include posting responses to public comments on the HSP website, host technical assistance program and UCCE trainings in October 2021, release the

solicitation October 2021 and run the application period for 4 months, implement projects as early as January 2022. Dr. Joshi requested questions on the overview.

Member Redmond brought to the panel's attention to two public comment letters which stated frustration with the reporting and paperwork requirements for HSP. Dr. Joshi outlined the program funding process which is based on practice verification and release of standard payment - this requires change requests if grantees would like to change their grant agreements. Dr. Joshi stated the importance that project change requests must be approved prior to implementation to make sure grantees understand what can be funded from HSP and does not lead to unfortunate surprises for the grantee. Member Redmond acknowledged the stated process but highlighted the potential need to lessen the burden on the current staff by increasing staff numbers. Member Redmond also stressed emphasizing incorporating discussions into the technical assistance program training.

Member Redmond expressed a desire to hear the responses of those in the field to these discussions. Chair Dlott indicated that the committee could agree to open discussion for a directed public comment to discuss these ideas. Member Diggs supported opening a specific public comment for HSP. Clair Dlott opened for public comment for HSP.

Public Member Asha Shama, from the Pesticide Action Network, commented that the reporting requirements are overly burdensome, they do not support the rolling application process, and they are concerned that CDFA will not be expanding their administrative support with the increased budget. She expressed her support for more technical assistance program trainings. She additionally requested that the HSP include in the request for grant applications integrated pest management and other practices that would reduce pesticide/herbicide usage on farms.

Public Member Jessie Cantor, from the UC Cooperative Extension and Small Farms Team in Fresno County, initially thanked members for comments, and emphasized that the HSP should focus on the adoption of practices versus just GHG emissions reductions. They proposed the creation of an ad-hoc committee to examine equity issues and potential flexibility within the program. They critiqued that the HSP does not help farmers that do crop rotations and that practices should be allowed to be applied to various parts of the project fields. Many farmers that have diverse crop rotations have been historically underserved, and the HSP does not support them in this regard.

Public Member Sacha Lozano, from the Resource Conservation District of Santa Cruz, expressed appreciation for all the work already done on the program, however did emphasize that the HSP needs to focus on equity more to include small underrepresented farmers. They expressed concern that practices being implemented on the same field for 3 years disadvantages small farms and/or socially disadvantaged farms due to constraints on crop rotations. They expressed understanding the scientific argument on having a practice on a field for 3 years, however emphasized HSP should also focus on adoption practice.

Public Member Brian Shobe, from the California Climate and Agriculture Network, commented that CDFA is not responsive and sometimes even dismissive of public comments. He also expressed frustration that these agenda items were informational and not action items, which would be more appropriate. He clarified the role of the Science Panel and cited that in statue, the Science Panel can advise on implementation details of the programs. He seconded the comments from previous stakeholders and commented that the meeting agenda needs to be clear so that stakeholders know when they can provide input on items.

Public Member Emily Winfield, from the North Coast Soil Hub, expressed the desire to see CDFA be more responsive and accepting of feedback from stakeholders. Additionally, to critically review the administrative and reporting requirements for the program as they are too burdensome for grantees. Suggested that this review could take the form of an interagency panel to review the program requirements. She also indicated that it was deeply troubling that no additional HSP staff

were going to be added on. Additionally she expressed support for the application process to be competitive instead of first come first serve.

Public Member Nadji Johnson from Series Imagery Company, expressed support for SWEEP and the promotion of new technologies into the SWEEP program.

Public Member John Gilchrist, from Climate Center, suggested the review of small and mid-size farmers first in the application process and to remove the rolling application basis (allocating 30-50% of fund for these farmers). Also commented that reporting requirement schedules should be reexamined to be more in line with less busy times in farmers work schedules.

Public Member Sarah Light, an Extension Educator, expressed concerns over the reporting requirements for the incentives and demonstration projects. She indicated that it is unclear why the demonstration projects require 2 reports per year, and why multiple files are required for Project Change Requests. She expressed the desire for more flexibility on outreach requirements due to covid, and the focus on higher quality events - quality over quantity. She emphasized that CCAs and PCAs should be included in outreach requirements, and that the first come first serve application basis does not benefit small and/or disadvantaged farmers.

Public Member Sri Sethuratnam, from the Center for Land Based Learning, emphasized the importance of having longer term projects, suggesting a 5-year program duration. Also commented that the program is receiving an unpreceded amount of funding, therefore it can make unpreceded changes as well.

Public Member Arohi Sharma, a Water Policy Analyst and Soil Health Analyst with Natural Resources Defense Council, echoed the comments of the other stakeholders and emphasized that the HSP program is set up in a way that disadvantages diversified farms. Also expressed concerns on the first-come, first-serve application process and that it does not support equity.

Chair Dlott asked for comments from the panel in response to public comment period. Member Dawley emphasized the contrast between inflexibility in spending public dollars versus stakeholders time and availability. Member Dawley pointed out that technical assistance providers are supposed to be the bridge for individuals to assist them with grant applications, invoicing, reporting to help them and emphasized that it is unfortunate that providers are the ones providing comments that the program isn't working equitably. Member Dawley also stated that the competitive application period will slow down funding and indicated that technical assistance providers, longer funding periods, and larger grant amounts should make the rolling application more equitable and work more smoothly. Member Dawley addressed outreach programs requirements and Covid issues and provided a proposal for changing who counts for outreach as a good idea for future solicitations. Member Diggs stated that the rolling application period seems to disenfranchise those that the HSP program should serve and stated that creative solutions should be considered. Member Redmond appreciated the comments from the public and emphasized the importance of listening to these comments to make sure HSP grantees experiences are positive. Dr. Gunasekara responded to comments for staffing concerns indicating that 5% of funds for administrative staff and a requirement for long term project management and requirement for employment which may outlast short term increases in funding. Dr. Gunasekara highlighted that 2020 funding was 26.5% for socially disadvantaged farmers using a first come, first serve basis. Dr. Gunasekara indicated he would provide farm size and SDFR funding information for SWEEP and HSP programs at next EFA-SAP meeting to provide clarity on dollar distribution. Chair Dlott expressed concern around the potential that HSP had a disproportionate amount of criticism and stated that it must be addressed if that is true but does not know if the criticisms are significant proportion of total population or compared to other grant programs. Chair Dlott asked for data on the perception of HSP to understand the proportion of dissatisfied grantees and stakeholders to better assess what changes should be addressed. Chair Dlott stated that delaying solicitation by changing from rolling application may result in significant delays in funding and grant efficiencies and would recommend HSP goes forward with the 2021 solicitation as a rolling application and then assesses the results.

### AGENDA ITEM 7 – Water Efficiency Technical Assistance Program (WETA); Draft Program Framework

Presentation by Carolyn Cook of CDFA. Ms. Cook outlined the budget for WETA as one-time \$5 million allocated for water efficiency and nutrient management technical assistance. She noted there is a draft solicitation that is accepting public comment currently for 3-year, \$500,000 maximum awards. Ms. Cook provided an overview of the outlined the eligible organizations which included RCD's, UCCE, Non-profited and federally and California-recognized Native American Indian Tribes. Ms. Cook provided an overview of the program.

Expert Parker asked if there would be money allocated for translation assistance. Ms. Cook responded that the program is modeled like the Climate Smart Agriculture Technical Assistance Program which does include translation services. Member Redmond inquired about training. Ms. Cook clarified that training is related to irrigation efficiency related to water, energy, nutrient efficiency. Member Redmond suggested coordination with irrigated lands regulatory program specifically in consideration for organic community nutrient use to make knowledge on this topic more widespread for all irrigation practices trainers. Member Cameron commented that irrigated lands regulatory program does not differentiate between organic and conventional.

Member Cameron also asked if this program would allow Resource Conservation Districts (RCD) to hire a person to work on these evaluations if they don't already have someone on this. Ms. Cook replied positively and stated this would be possible if the RCD can show the person is experienced with water efficiency and administrative experience.

Chair Dlott asked if commodity boards are eligible? Dr. Gunasekara stated that the commodity board will need to evaluate if that board has a non-profit arm and that historically these types of programs have been limited to RCD, UCCE, Non-profits, and Federally- and California-recognized Native American Indian Tribes. Chair Dlott asked if this also includes CSU's and community colleges. Ms. Cook replied yes it does.

### AGENDA ITEM 8 – Climate Smart Agriculture Technical Assistance Program; Updates

Presentation by Carolyn Cook of CDFA. Ms. Cook clarified that the technical assistance program covers SWEEP, HSP, and other climate-smart programs. Ms. Cook provided an overview of the work by the program listing a proactive solicitation for HSP and SWEEP technical assistance funding. Ms. Cook also indicated that there will likely be another solicitation for technical assistance upcoming to help with the large budget increase and that an update on this will be presented at the next EFA-SAP meeting.

Chair Dlott inquired if all money is typically expended for the technical assistance providers to see if these providers could assist with the grant funding increase. Ms. Cook indicated that the funding has been under subscribed consistently. Chair Dlott emphasized that this would be a very good opportunity for programs in underserved areas to take advantage of to help with fulfilling grant program requirements. Dr. Gunasekara noted that it is difficult to put out a solicitation without knowing the dollar amount available, but it must be done to give enough time to get the technical assistance program contracts in place before the grant incentive program solicitation is released. Chair Dlott asked for clarification on the timing of the technical assistance program solicitation release. Ms. Cook indicated that there is not yet a timeline available for AMMP and the Pollinator Habitat Program, but that HSP and SWEEP technical assistance provider awards were announced in July 2021. The technical assistance providers awarded for these programs will be ready for assisting with HSP and SWEEP solicitations this October. Chair Dlott asked if there might be funds available for implementation in addition to application given the expected increase in grant applicants and new grantees. Ms. Cook indicated that HSP has only had one solicitation release

with technical assistance providers available and this has been an important collaboration between farmers and technical assistance providers for applying and participating in HSP. Dr. Gunasekara clarified that the current technical assistance providers grant agreements do allow for on-going grant assistance in addition to the application, including project change requests. Member Parker seconded and pointed out that the technical assistance providers spend a lot of time on assisting with the implementation phase.

### **AGENDA ITEM 9 – Public Comments**

Chair Dlott opened the public comment period for all agenda items.

Public Member Brian Shobe, from the California Climate and Agriculture Network, offered a compromise for the application review process where a portion of funds are released for first come first serve, then a portion is held until the end of the 4-month application period to allow more time for application submittal and provide time for CDFA staff to assess the equity statistics on the funding awarded. He emphasized previous statistics that less complex applications were submitted last time there was a first come first serve application process. He requested a motion to vote on this proposal. Additionally, he commented for SWEEP that keeping the funding cap limit would allow more grants to be awarded, and that during the SWEEP advisory group process, the topic of increasing the cost cap was never brought up as a topic of concern.

Public Member Katy Patterson, from American Farmland Trust, indicated that they will be providing written comments on the CAPGP that will reflect compatibility with new legislation, including language on groundwater sustainability, and the prioritization of high and medium priority basins in conservation planning funding efforts.

Public Member Rebekah Weber, from CCOF, commented on the CAPGP in that CDFA should create a separate organic transition plan program.

Public Member Asha Sharma supported CCOF's comments for the need to make a separate organic transitional program.

Chair Dlott opened up the floor for comment and Member Redmond indicated she wanted to discuss the rolling application process further and consider the public comment "pause" proposal from Brian Shobe. Member Hansen asked what would need to happen to the guidelines if this application process changed. Dr. Gunasekara clarified that it would be like closing and opening a new solicitation all over again. Member Diggs clarified that accepting applications would not be paused, but the awarding would be, and expressed caution that this change in application acceptance would need to be communicated clearly to the public. Member Cameron expressed concern over not having enough interest based on changing the application process and not being able to allocate all the funds if there was the change. Dr. Gunasekara indicated that in general the HSP and SWEEP programs are oversubscribed by 150-200%. Member Cameron expressed concern over HSP specifically. Dr. Gunasekara referenced the statistics for the 2020 HSP, and out of the \$25 million available, the over-subscription rate was 192%, and it could have been higher. Chair Dlott stated that the program now has 3 times the amount of funding from the 2020 year. Chair Dlott expressed desire to focus on the key issue of equity and how lack of technical assistance providers will still be an issue regardless of the application process. Chair Dlott inquired if more funding could be provided for technical assistance services. Member Dawley expressed concern based on comments received about confusing program requirements, and that if the application acceptance process changed, it might create more confusion. Member Redmond expressed desire to get back to the comment from Chair Dlott on Technical Assistance.

Chair Dlott then asked for Member comments on the proposed funding cap increase for SWEEP. Member Diggs expressed mixed feelings because implementation costs have increased but increasing the cost cap would limit the amount of applications awarded. Member Cameron suggested a compromise of \$150,000 cost cap. Member Buffington suggested a higher incentive

value for socially disadvantaged farmers. Dr. Gunasekara commented that with the 25% SDFR rule, there have been 49% for SWEEP and 26% for HSP for SDFR applicants. Expert Norris mentioned that in NRCS they have 2 rates, 1 is for historically underserved producers and the other is a standard rate. Member Hansen didn't feel prepared weigh in on this question but is open to further the conversations.

Chair Dlott refocused on the comments regarding equity and the solicitation release and proposed the formation of a subcommittee to identify best solicitation options moving forward to address underlying equity issues. Member Cameron wanted to emphasize that any action should not delay the release of funds this year. Chair Dlott clarified that this subcommittee would work on decisions for the next solicitations, and that the current solicitations would move forward with minimal changes as needed. Member Buffington indicated that CARB would be happy to join in the subcommittee and partner with CDFA in these discussions. Chair Dlott suggested USDA and DWR also be part of the conversation. Member Diggs suggested a motion for the following: 1) CDFA staff to continue the current expedited solicitations, while taking into consideration the public comments received, and 2) next year's solicitations will be updated based on a comprehensive analysis of solicitation types across several program, with the focus of improving access and equity. This motion was seconded by Member Cameron, and the Panel unanimously passed this motion.

The Members asked for clarification on if the motion included the SWEEP funding cost cap. Member Diggs proposed an amendment to include SWEEP into the previously passed motion. Member Diggs accepted the amendment and the Panel unanimously passed the amended motion.

### **AGENDA ITEM 10 – Next Meeting**

Dr. Gunasekara indicated that the next meeting would be January 13, 2022. The location has yet to be determined and may possibly be remotely held.

Chair Dlott introduced the motion to adjourn the meeting. The motion was moved by Member Cameron and seconded by Member Buffington. Panel members unanimously voted to adjourn. Meeting was adjourned at 2:44 PM.

Respectfully submit	ted by:
Amrith Gunasekara	, Ph.D. onmental Farming Act Science Advisory Panel

# **AGENDA ITEM 3**

# **AGENDA ITEM 4**



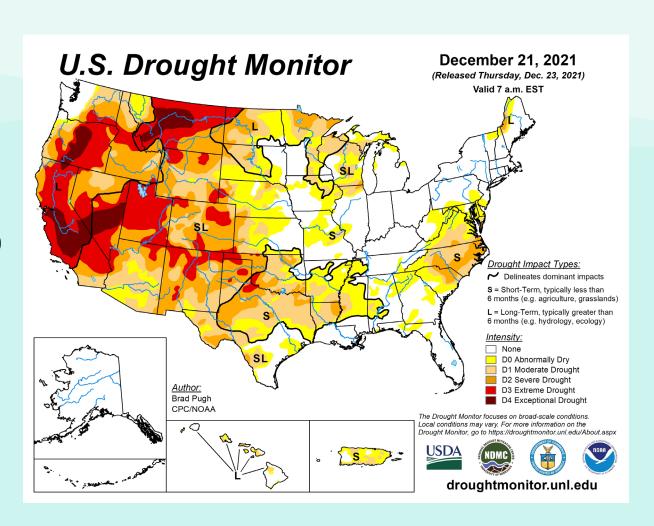


# State Water Efficiency and Enhancement Program Solicitation Update

Environmental Farming Act, Science Advisory Panel January 13, 2022

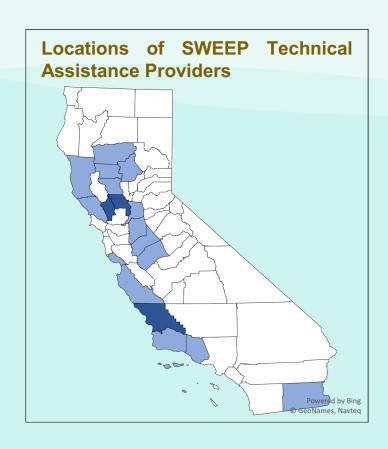
# **2021 SWEEP Funding**

- Budget Act of 2021 appropriated \$50 M from General
   Fund
- \$43 million available for SWEEP awards
- Application Period: October 19, 2021-January 18, 2022
- First-come, first-served process
- Applicants must meet a minimum score of 30 out of 50 to be funded.
- 25% of funding reserved for Socially Disadvantaged Farmers and Ranchers and projects that provide benefit to AB 1550 Priority Populations
- \$2 M available for projects that utilize sub-surface irrigation to apply dairy manure effluent.



# **Technical Assistance Resources**

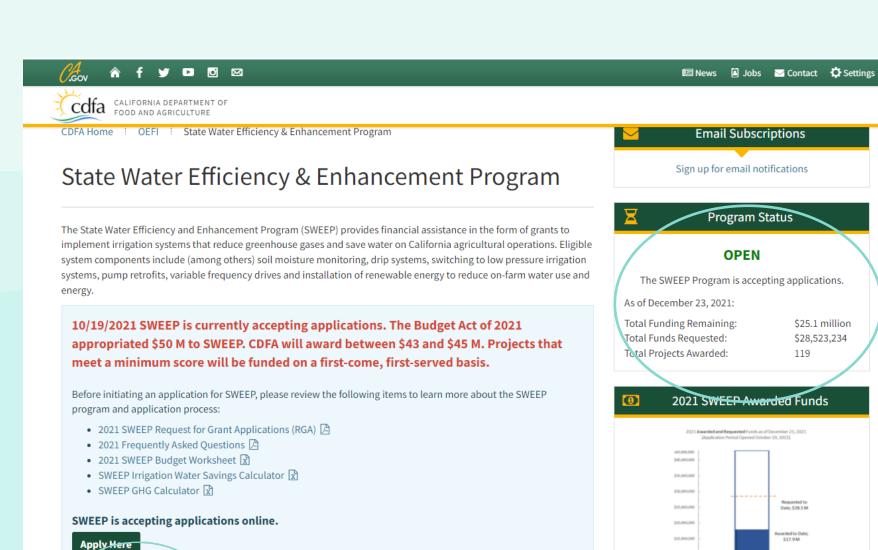
- 21 Technical Assistance Providers (TAPs)
- 10 UC ANR Community Education Specialists (CESs)
- 19 TAPs/CES workshops hosted
- 3 webinars hosted by SWEEP team
- Weekly TAP office hours
- SWEEP webpage updated weekly



# Program Status

As of December 23, 2021:

- 119 Projects
   Selected for Award
- \$17.9 M Awarded



2021 SWEEP Awarded Projects

Technical Assistance Resources

Interested applicants can willize the technical assistance resources below to develop and submit a SWEEP

Awarded Projects List 🚨

application.

\$10,000,000

Click to enlarge image €

Awarded and Requested Funds Information A



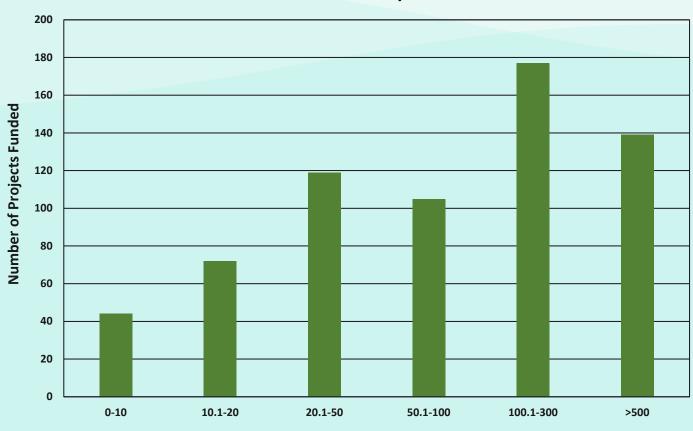
# **Current SWEEP Solicitation – Applications Received**



<sup>\*</sup>Data as of 12/13/2021

# Farm Size Distribution (Past Solicitations)

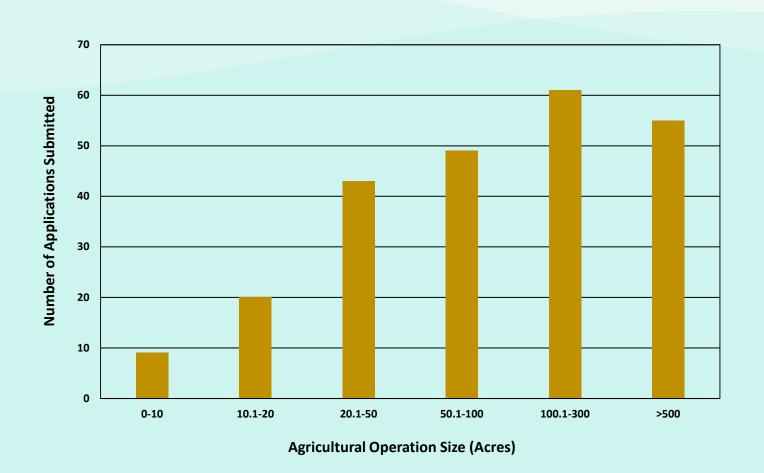
Distribution by Number of Awarded Applications (2015-2019 Solicitations)



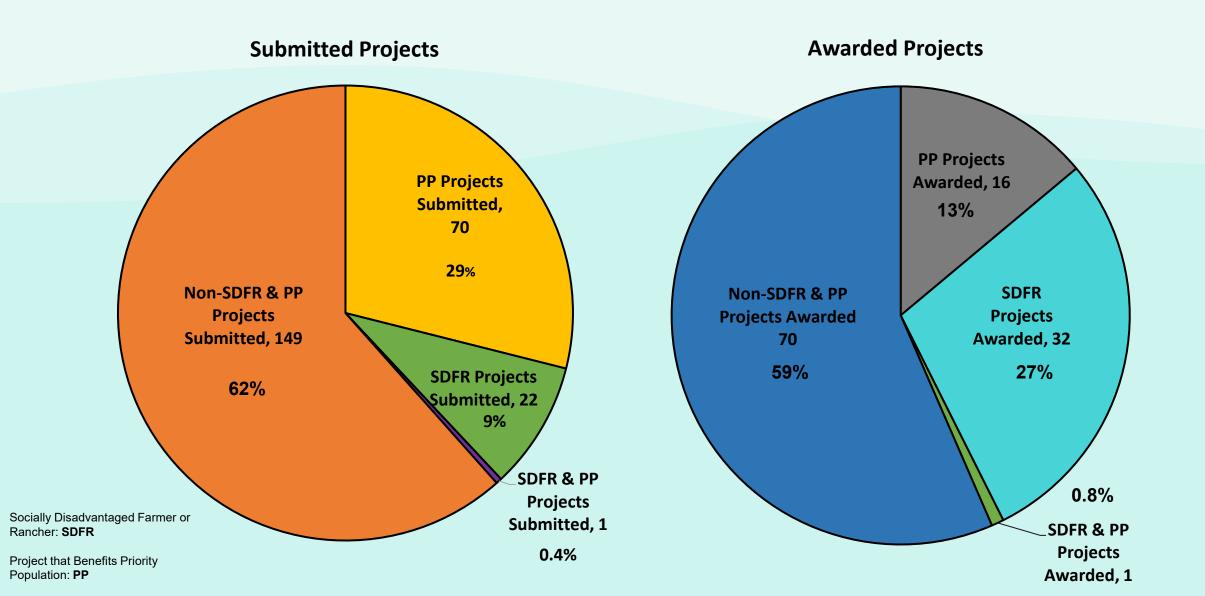
**Agricultural Operation Size (Acres)** 

# Farm Size Distribution for Current Solicitation (2021)

### **Distribution by Number of Submitted Applications**



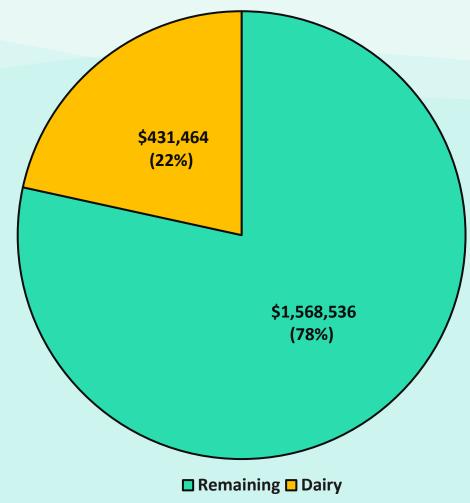
# **2021 Priority Group Submission and Awards**





# **Sub-Surface Drip for Dairy Effluent Projects**

- CDFA set aside \$2M for projects using subsurface drip irrigation to apply dairy effluent to field crops.
- Currently, 1 project submitted and 2 more projects in draft. Total requested if the 2 other projects are submitted would total \$431,464.11 = approx. 22% of 2M.



Dairy Projects Initiated of \$2 M Available



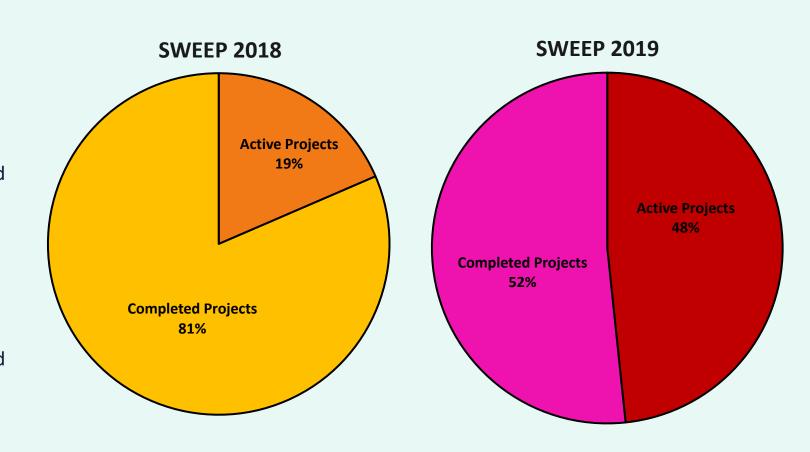
# **Project Status for 2018 and 2019 Rounds**

### **SWEEP Round 2018**

- 19 projects still active
  - o 11 have requested an extension
  - 3 are in the process of being verified
- 88 projects completed
- 108 total projects

### **SWEEP Round 2019**

- 58 projects still active
  - o 40 have requested an extension
  - 9 are in the process of being verified
- 62 projects completed
- 120 total projects



# **Questions?**

# For more information:

www.cdfa.ca.gov/oefi/sweep

Email: Cdfa.sweeptech@cdfa.ca.gov

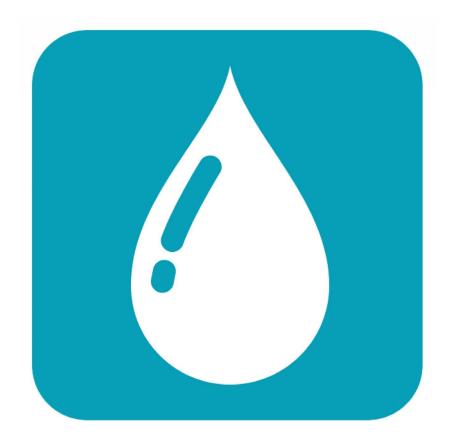


# **AGENDA ITEM 5**



# SWEEP Pilot Program for Southern Desert Region

Concept Proposal for Water Savings Focused Projects



# Limited to the Southern Desert Region

 The southern desert region is proposed to be defined as Imperial county and Riverside Counties east of the Santa Rosa and San Jacinto Mountains





# CDFA's Requirements for Pilot Program

- CDFA will dedicate \$2 million dollars for funding to be awarded through a water-savings focused pilot program in the southern desert region.
- These projects will only need to demonstrate water savings through the SWEEP water savings assessment tool.
- Projects will not be required to provide a GHG calculator or a pump test but must not result in an increase in GHG production post-project.
- Projects will be required to provide baseline energy records.
- All awarded projects will provide any energy records from the project site for three years after implementation.
- Individual projects have a maximum award amount of \$200,000.
  - CDFA can anticipate 10-12 projects.

# How Can CDFA's Requirements Be Met?

CDFA requires input on the types of projects that will be potential applicants.

## Possible Project Components

- The pressurization of surface water to convert a flood irrigated field to pressurized micro-irrigation. This will require an energy offset.
- Upgrades to a mobile irrigation pump that is used for multiple fields.
- The use of low-pressure drip irrigation technology.
- The installation of powerlines or in-field solar/renewable energy.
- The use of utility <u>provided green energy</u>.

# Pilot Program-Specific Requirements

- All new stationary pumps proposed to be installed should be electric.
- Allow for new pumps to be installed.
- Allow for upgrades to mobile diesel pumps.
- Allow for an individual to apply for green energy through the utility or install solar on-site so that project will not result in an increase in GHG.
- CDFA SWEEP funds can be used to fund utility interconnection.



# SWEEP Pilot Compared to Traditional SWEEP

Scenarios	Traditional SWEEP	SWEEP Pilot
Requires Water Savings	Yes	Yes
	Yes	No
Requires no net increase in GHG	Yes	Yes
Does not allow for the drilling of new wells	Yes	Yes
Requires energy use documentation	Yes	Yes
Requires a pump tests	Yes	No
Accessible to agricultural operations throughout the state	Yes	No – limited to desert region
Can utilize Technical Assistance Providers	Yes	Yes
Maximum Grant Award Amount		

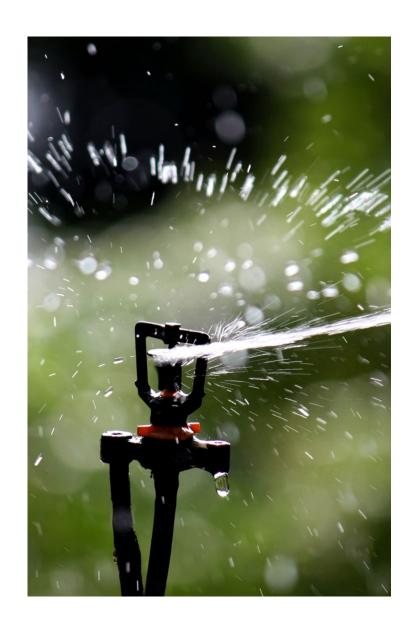
# Next Steps

- 1. Finalize draft RGA and Post for Public Comment (30 day)
- 2. If CDFA Receives Comments that Help Shape a Framework that Will Result in Water Savings without Increase in GHG Emissions:
  - Create application portal
  - Update budget and other related resources
  - Finalize RGA
  - Train Technical Assistance Providers (TAPs)
  - Release solicitation
  - Conduct CDFA SWEEP Pilot lead workshop(s)

# AGENDA ITEM 6

# Water Efficiency Technical Assistance (WETA) Grant Program

Update on Solicitation



# Recap of Funding Opportunity

#### Budget Act of 2021 Water and Drought Resilience Package

One-time funding of \$5 million allocated for water efficiency and nutrient management technical assistance

- Maximum award of \$500,000
- Three-year grant term



#### **Eligible Organizations**

Must be located in California with a physical California business address

- Resource Conservation Districts (RCDs)
- University of California, California State Universities, California Community Colleges
- Non-profit organizations
- Federally- and Californiarecognized Native American Indian Tribes



#### Three Program Objectives

- 1. On-farm, one-on-one technical assistance to evaluate irrigation system efficiency (aka mobile irrigation lab) and provide diagnostics, report and recommendations to growers
  - Distribution uniformity testing
  - Irrigation water management system audits
  - Nutrient management

#### 2. Coordinate or Provide Pump Efficiency Testing

- Purchase on behalf of growers
- Perform pump tests

# 3. Provide Training regarding Water and Nutrient Management Practices and Technology

- In-person trainings or webinars in English and other languages
- Recorded (on-demand) training programs in non-English languages
- Provision of certificate of completion encouraged whenever possible

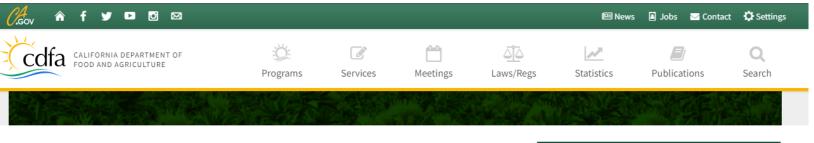
# Program Framework & Timeline

- Competitive Grant Application
- Custom Workplan include any or all the 3 Program Objectives
- Itemized Budget

Activity	Tentative Dates*
Application Period Begins	November 22, 2021
Applications Due	January 19, 2022
Review Period	January 20, 2022- February 2022
Announcement of Awards	February 2022
Execution of Grant Agreements	March 2022 — May 2022
Grant Term Begins	June 30, 2022
WETA Awardees Provide Technical Assistance	June 30, 2022 – June 30, 2025

<sup>\*</sup>Subject to change

#### New Website



#### Water Efficiency Technical Assistance Program

CDFA Home | OEFI | Technical Assistance | Water Efficiency Technical Assistance Program

The Budget Act of 2021 appropriated \$5 million to CDFA for irrigation water efficiency and nutrient management technical assistance grants. The Water Efficiency Technical Assistance (WETA) grant program is designed to facilitate technical assistance to agricultural operations for on-farm water and energy use efficiency and nutrient management.

Organizations that receive funding will work on any or all of three program objectives:

- 1. Provide on-farm, one-on-one technical assistance to farmers to evaluate irrigation system efficiency (e.g., mobile irrigation lab) and provide diagnostics, reports and recommendations to growers.
- 2. Coordinate or provide pump efficiency testing for farmers.
- 3. Provide training regarding water use efficiency and nutrient management practices and technology.

#### CDFA is currently accepting applications for the WETA Grant Program.

universities, and California and federally recognized Tribes may apply for up to \$500,000 to provide technical assistance over a three-year grant term. Before initiating an application for WETA, please review the following items to learn more about the program and application process:

- Water Efficiency Technical Assistance Request for Grant Applications (RGA)
- Workplan and Budget Template for RCDs, Non-Profits and Tribes
- Workplan and Budget Template for UC/CSU
- Application Portal
- Frequently Asked Questions and Answers Updated 12/15/21

Through a competitive grant application process Resource Conservation Districts, non-profit organizations,

https://www.cdfa.ca.gov/oefi/technical/weta.html

Applications are due January 19, 2022 by 5 pm PT



**Program Status** 





CDFA accepted public comment on a draft Request for Applications for the WETA program from October 1, 2021 through October 15, 2021.

- WETA Draft Request for Applications
- · Public Comments Received
- · Public Comment Summary and Response



# Update on Open Solicitation

Application Period Opened on November 22, 2021

Application Webinar was held on November 30, 2021

As of 12/23/2021

- 13 Applications Initiated
- o Applications Submitted



### Questions?







# AGENDA ITEM 7



# Technical Assistance Program for Climate Smart Agriculture

CDFA OFFICE OF ENVIRONMENTAL FARMING & INNOVATION

#### Climate Smart Agriculture Technical Assistance

Update to the Environmental Farming Act Science Advisory Panel

January 13, 2022

#### Awards Announced

Held proactive solicitation for Healthy Soils Program (HSP) & State Water Efficiency and Enhancement Program (SWEEP) in February 2021 39 applications received

Awards announced July 29, 2021 \$2.7 M 36 awarded organizations

#### News Release

#### CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE

Media Contacts: Steve Lyle (CDFA), 916-654-0462, officeofpublicaffairs@cdfa.ca.gov



CDFA AWARDS \$2.7 MILLION IN TECHNICAL ASSISTANCE FUNDING TO SUPPORT THE HEALTHY SOILS PROGRAM AND THE STATE WATER EFFICIENCY AND ENHANCEMENT PROGRAM



Release #21-087



#### Español

SACRAMENTO, July 29, 2021 - The California Department of Food and Agriculture (CDFA) today announced it has selected thirty-six organizations for Climate Smart Agriculture (CSA) Technical Assistance (TA) awards, totaling \$2.7 million. With these funds, thirty-one organizations will provide technical assistance to the applicants and awardees of CDFA's Healthy Soils Program (HSP) and twenty-one will provide assistance to applicants and awardees of the State Water Efficiency and Enhancement Program (SWEEP).

Resource Conservation Districts, University of California Cooperative Extension and non-profits are eligible for Climate Smart Agriculture technical assistance funds. For every appropriation to Climate Smart Agriculture Programs, CDFA makes available at least five percent of the funds to technical assistance grants

### HSP and SWEEP Assistance

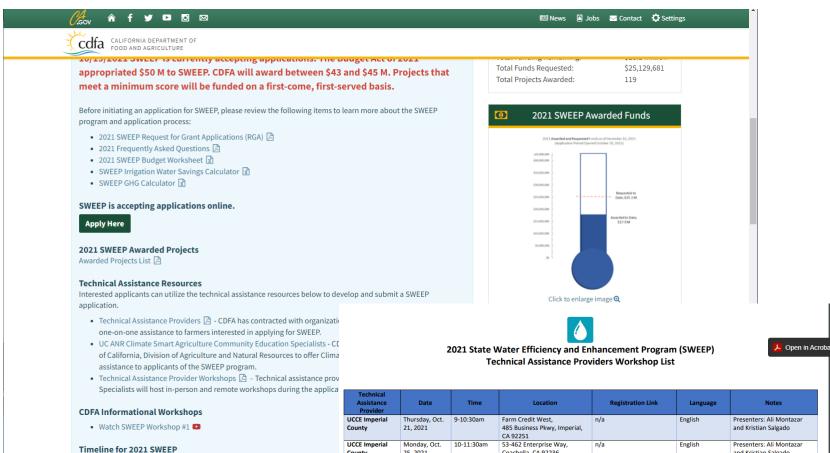
36 awarded organizations
21 RCDs
10 non-profits
5 university partners

21 for SWEEP 32 for HSP





### Ongoing SWEEP and HSP Technical Assistance Efforts



First invoice and report due end of February 2022.

Technical Assistance Provider	Date	Time	Location	Registration Link	Language	Notes
UCCE Imperial County	Thursday, Oct. 21, 2021	9-10:30am	Farm Credit West, 485 Business Pkwy, Imperial, CA 92251	n/a	English	Presenters: Ali Montazar and Kristian Salgado
UCCE Imperial County	Monday, Oct. 25, 2021	10-11:30am	53-462 Enterprise Way, Coachella, CA 92236	n/a	English	Presenters: Ali Montazar and Kristian Salgado
San Joaquin Farm Bureau Federation	Tuesday, Oct. 26, 2021	10am	Virtual Zoom workshop or in person: San Joaquin Farm Bureau Federation 3290 Ad Art Rd Stockton, CA 95215	https://us02web.zoom.us/ meeting/register/tZMucO6 przgiGNVSHpwlSnKtzHFHzi 1UC6Df	English	
UCCE Imperial County	Wednesday, Oct. 27, 2021	9-10:30am	Farm Credit West, 485 Business Pkwy, Imperial, CA 92251	n/a	English	Presenters: Ali Montazar and Kristian Salgado
Glenn County RCD/UCCE Glen County	Tuesday, Nov. 2, 2021	9am-12pm	Glenn Success Square – Conference Center 131 E Walker Street Orland, CA 95963	n/a	English	9am – Healthy Soils Program Overview 10am – SWEEP Overview 11am – Open House
UCCE Imperial County	Wednesday, Nov. 3, 2021	9-10:30am	Farm Credit West, 485 Business Pkwy, Imperial, CA 92251	n/a	Spanish	Presenters: Ali Montazar and Kristian Salgado
Upper Salinas- Las Tablas RCD	Monday, Nov. 8, 2021	1pm	Zoom Meeting	https://us02web.zoom.us/ j/9974294604?pwd=K3h5 WnR0OUxTdkxOT1BQQW hoMG05Z209		

# AMMP Solicitation & Awards

#### **News Release**

CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE

CDFA NOW ACCEPTING

ASSISTANCE PROGRAM

CLIMATE SMART

GRANT APPLICATIONS FOR

AGRICULTURE TECHNICAL

Media Contacts: Steve Lyle (CDFA), 916-654-0462, officeofpublicaffairs@cdfa.ca.gov



# cdfa Release #21-139

Print This Release

#### 3 Applications Received

2021

 3 Applications Selected for Award

Accepted Applications October

27, 2021 through November 24,

#### Español

SACRAMENTO, October 27, 2021 – The California Department of Food and Agriculture (CDFA) is now accepting applications for Climate Smart Agriculture (CSA) Technical Assistance Program funding. This grant solicitation is being conducted to ensure there are Technical Assistance Providers available to provide outreach to farmers and ranchers about the Alternative Manure Management Program (AMMP).

Funds awarded through this competitive grant process will be distributed to several eligible entities and throughout the state to assist farmers and ranchers in applying to AMMP and provide continued assistance during project implementation. Eligible grant entities include Resource Conservation Districts, University of California Cooperative Extension, and non-profit organizations with demonstrated technical expertise.

"Technical assistance to our dairy and livestock families is critical to achieve California's methane reduction goals," said CDFA Secretary Karen Ross. "Technical Assistance Providers offer direct assistance to farmers and ranchers submitting applications, and then they help our producers implement the projects that result in reducing a potent, short-lived climate pollutant that contributes significantly to climate change."

Eligible organizations may request up to \$120,000 to help applicants and awardees for two rounds of AMMP, 2021 and 2022. AMMP, along with the Dairy Digester Research and Development Program, received \$32 million in the 2021-22 budget; and will receive \$48 million in fiscal year 2022-23. A minimum of five percent



# For More Information

# CDFA's Climate Smart Agriculture Technical Assistance Grant Program

www.cdfa.ca.gov/oefi/technical/index.html



# **AGENDA ITEM 8**



# Healthy Soils Program

CDFA OFFICE OF ENVIRONMENTAL FARMING & INNOVATION

Environmental Farming Act
Science Advisory Panel Meeting

January 13, 2022

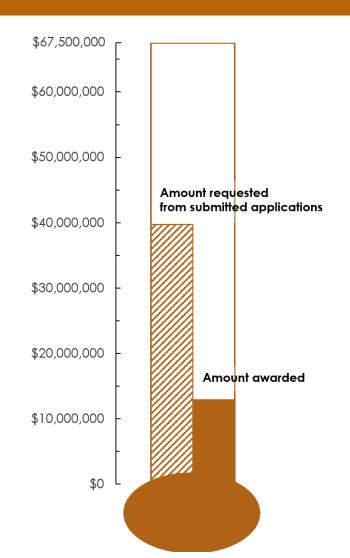
Sacramento, CA

#### **Outline**

- Solicitation Update
  - Incentives Program
  - Demonstrations Program
- Historic HSP Overview
  - Funding by Farm Size
  - Program Statistics

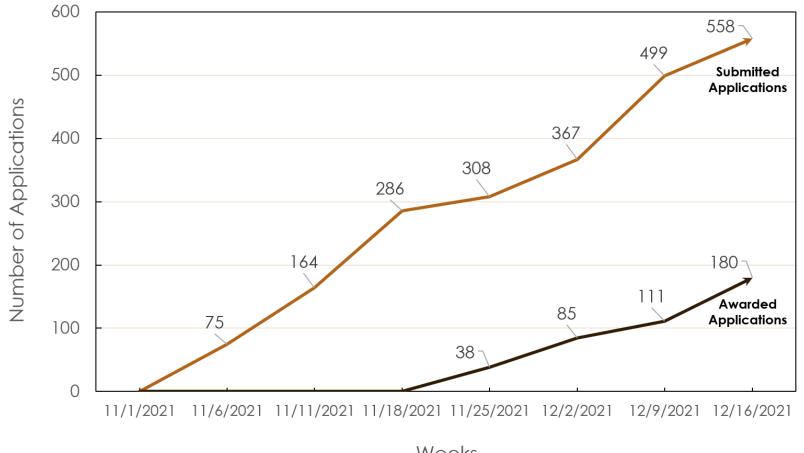


- Solicitation window: November 1, 2021 -February 25, 2022, or until funds are expended.
- As of December 16, 2021:
  - \$39,758,609.96 requested from 558 applications
    - \$10,823,993.39 requested by SDFR (181 applications)
    - \$1,531,991.91 requested that benefits priority populations (21 applications)
  - \$12,960,838.64 awarded from 180 applications

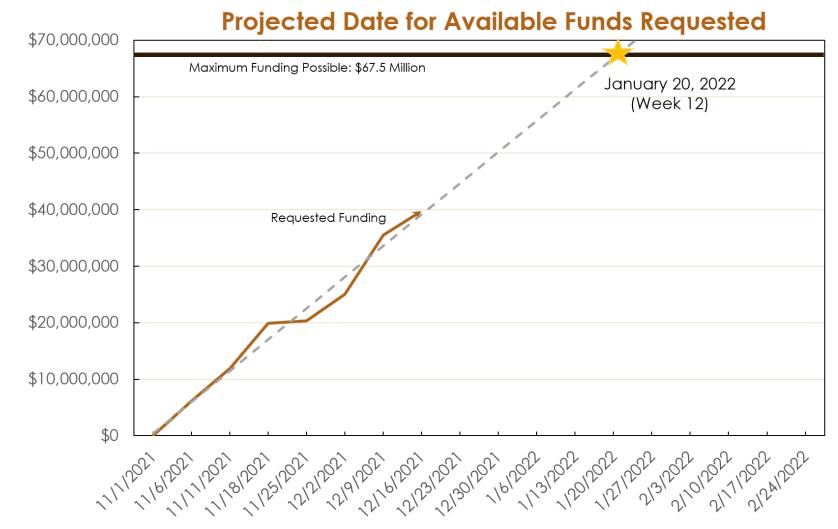


- Application submission and awarding rate
- Updated December 16, 2021

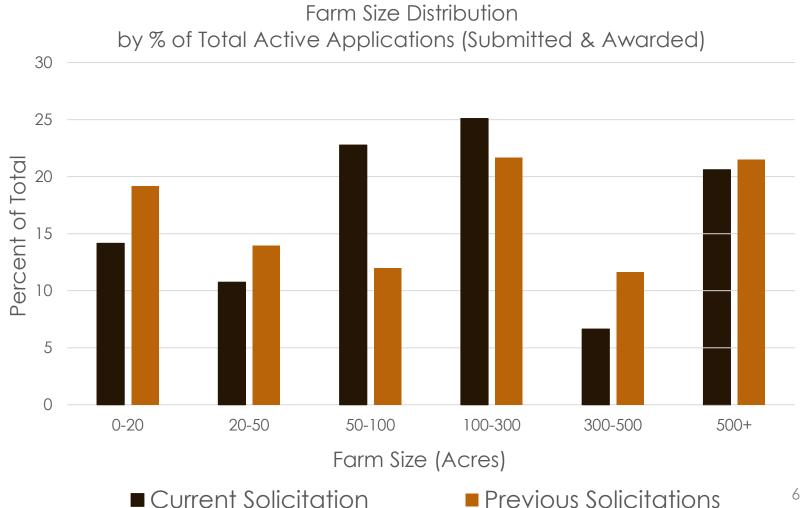
#### HSP Incentives Program Applications Submitted & Awarded by Week



 Linear projection for timeline to 100% of available funds requested based on submitted applications as of December 16, 2021



- Distribution of farm size in current solicitation compared to all previous solicitations combined
- Current solicitation is on-going, distribution as of December 16, 2021



- Outreach as of December 16, 2021:
  - Applicants
    - 2 application workshops provided
      - 137 attendees
    - 1 additional application workshop to be hosted on 1/20/2022
  - Technical Assistance Providers
    - 56 attendees at TAP Training Workshop in October 2021
    - 7 TAP "Office Hours" meetings held so far
      - 55 attendees
    - 10 additional "Office Hours" meetings to be held

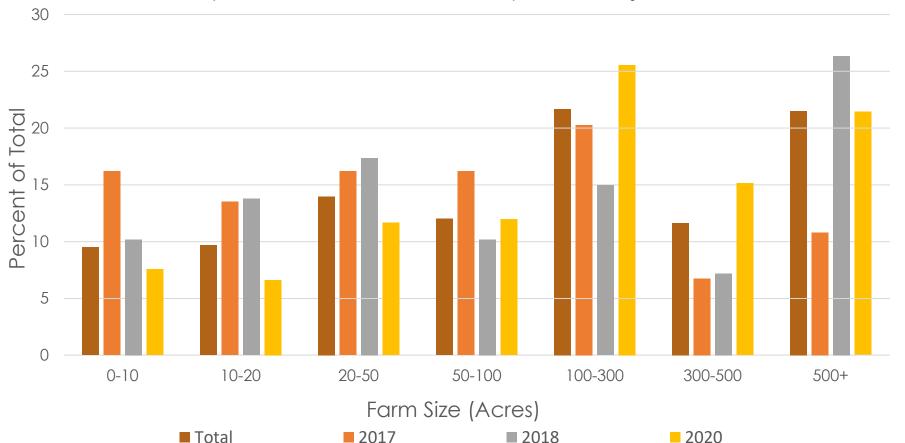
# Solicitation Update – Demonstrations

- Solicitation window: November 1, 2021 December 31, 2021
- As of December 16, 2021:
  - 0 applications submitted
  - 62 applications started, but not submitted
  - 2 application assistance workshops provided
    - 26 attendees



# Historic HSP Funding by Farm Size





Available Funding per Solicitation Year

2017: \$1,853,012 2018: \$7,118,761 2020: \$21,256724

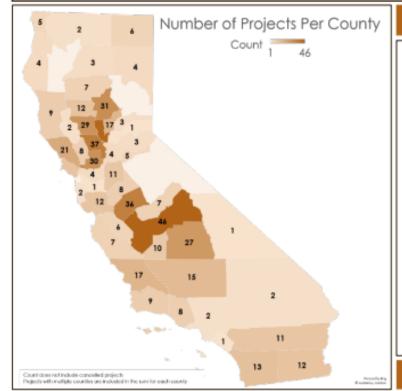


# Historic HSP Program Statistics – Incentives

- Grant numbers as of November 1, 2021:
  - 481 Active (79.6%)
  - 73 Completed (12.1%)
  - 50 Cancelled (8.3%)
    - Selling farm
    - Cannot complete work
    - Covid-19 Pandemic

#### Incentives Program 2017-2020 Summary by the Numbers

- Total Number of Funded Projects: 604
- Total Greenhouse Gas Reductions: 109,089 MTCO<sub>2</sub>e
- Total Practice Implementation Acres: 51,300







### Historic HSP Program Statistics - Demonstrations

- Grant numbers as of November 1, 2021:
  - 54 Active (76.1%)
  - 5 Closed Out Complete (7%)
  - 7 Closed Out Incomplete (9.9%)
  - 5 Cancelled (7%)

#### Demonstration Projects 2017-2020 Summary by the Numbers

- Total Number of Funded Projects: 71
- Total Greenhouse Gas Reductions: 3,900 MTCO<sub>2</sub>e
- Total Practice Implementation Acres: 3,036
- Outreach from Closed-out Projects: 1,226 Farmers / Ranchers







# Thank you!

Questions?

Contact us:

CDFA.HSP\_Tech@cdfa.ca.gov

# **AGENDA ITEM 9**



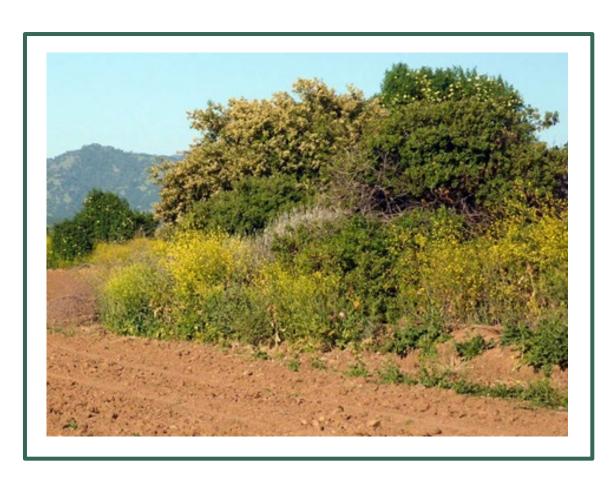
#### POLLINATOR HABITAT FUNDING

UPDATE ON THE DEVELOPMENT OF A NEW PROGRAM TO SUPPORT INSTALLATION OF POLLINATOR HABITAT ON CALIFORNIA FARMS AND RANCHES

ENVIRONMENTAL FARMING ACT SCIENCE ADVISORY PANEL JANUARY 13, 2022



#### POLLINATOR HABITAT PROGRAM FUNDING



SB 170, Skinner. Budget Act of 2021.

Chapter 240. SEC. 170. Item 8570-102-0001. (1). 7.

"Of the amount appropriated in this item, \$15,000,000 shall be available for the Pollinator Habitat Program. The department shall prioritize the planning of native habitats for the benefit of native biodiversity and the use of locally appropriate native plant seed mixes when feasible."

- \$15 M available in 2021-2022
- \$15 M available in 2022-2023



# ADOPT ELEMENTS OF THE HEALTHY SOILS PROGRAM





Adopt payment rates of HSP

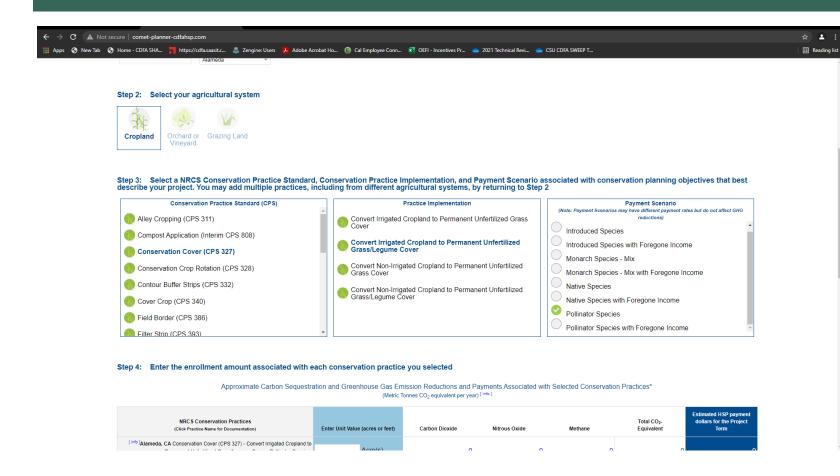


Review NRCS Conservation Practice Standards that indicate wildlife habitat/pollinator benefit as a "Purpose"



Comet-Planner can be used to quantify the climate benefits of a project

#### PRACTICES FOR POLLINATOR BENEFITS

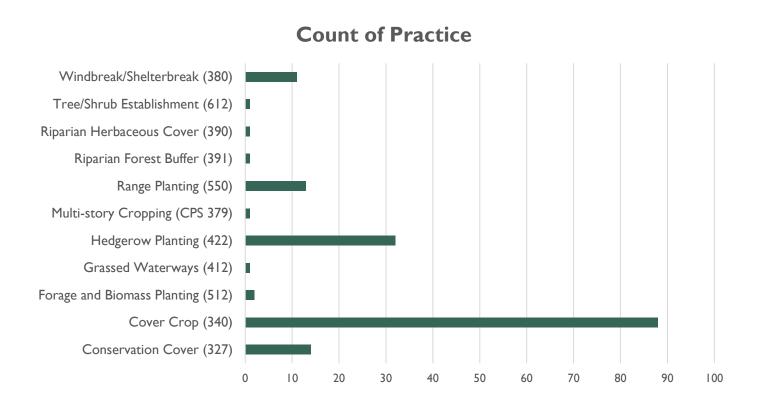


### Some Practices with Pollinator Benefits

- Conservation Cover (CPS 372\*)
- Cover Crop (CPS 340)
- Field Border (CPS 386)
- Forage and Biomass Planting (CPS 512)
- Hedgerow Planting (CPS 422)
- Multi-story Cropping (CPS 379)
- Range Planting (CPS 550)
- Riparian Forest Buffer (CPS 391)
- Riparian Herbaceous Cover (CPS 390)
- Tree/Shrub Establishment(CPS 612)
- Windbreak/Shelterbreak (CPS 380)

# POLLINATOR BENEFITS FROM 2020 HEALTHY SOILS PROGRAM FUNDING CYCLE

- Of 324 projects, I29 were identified as having pollinator benefits
- 129 projects
- 165 practices
- 36 counties
- Total of 7,089 acres
- Merced (17), Yolo (14), and Tulare (13) had the greatest number of projects.





#### FORMAT FOR POLLINATOR HABITAT PROGRAM

#### Two Options Under Consideration by CDFA:



**Block Grant** 

Award organizations administer multiple projects with farmers and ranchers



**Direct to Farmers & Ranchers** 

Partner with Technical Assistance Providers

#### **NEXT STEPS**

- Release a Draft Request for Grant Applications for Public Comment
  - Incorporate updates based upon public comment
  - Create Application Submission Portal
- Hire Biodiversity Coordinator (Senior Environmental Scientist, Specialist)

Please sign up for email notifications at:
<a href="https://www.cdfa.ca.gov/subscriptions/MailChimp-signup.html">https://www.cdfa.ca.gov/subscriptions/MailChimp-signup.html</a>
<a href="https://www.cdfa.ca.gov/subscriptions/MailChimp-signup.html">https://www.cdfa.ca.gov/subscriptions/MailChimp-signup.html</a>
<a href="https://www.cdfa.ca.gov/subscriptions/MailChimp-signup.html">https://www.cdfa.ca.gov/subscriptions/MailChimp-signup.html</a>





## **AGENDA ITEM 10**



# Conservation Agriculture **Planning** Grants Program (CAPGP)



Environmental Farming Act
Science Advisory Panel

January 13, 2022

### Background

- This program will fund the development of various types of agricultural conservation activity plans (CAPs) related to CDFA's Climate Smart Agriculture (CSA) programs. CSA addresses risks that climate change poses to agriculture.
- ► The funded plans will promote CSA efforts which will help to mitigate GHG emissions, adapt to climate change impacts and promote environmental and agricultural sustainability.

## **Program Update**

Timeframe	Activity
April 29, 2021	CAPGP Draft RFP presented to EFA SAP
May 13 - June 16, 2021	Public Comment Period (Round 1)
July 15, 2021	CAPGP update presented to EFA SAP
September 16 - October 19, 2021	Public Comment Period (Round 2)

# Summary of Public Comments Round 2

- ► CDFA accepted public comments on the second Conservation Agriculture Planning Grant Program Draft Request for Proposals (RFP) from September, 16 2021 through October 19, 2021.
- Received public comments from 17 entities
- ► CDFA staff identified **56** total comments from within the 17 comment letters
- Of the 56 total comments, 27 are unique (comments were repeated by multiple commenters)
- Of the 27 <u>unique</u> comments:
  - **2** comments: are supportive of provisions of the draft
  - 2 comments: were determined to be out of scope of the draft
  - **9** comments: CDFA accepted the comment and plans updates to the RGA
  - ▶ 13 comments: CDFA does not plan to incorporate the requested change
  - ▶ 1 comment: CDFA is evaluating how to incorporate the request.

### **Key Updates**

- Culturally relevant traditional foods can be included in planning grants.
- ► Groundwater Sustainability Agencies will be added to the list of eligible entities.
- ► CDFA will clarify that the Organic Systems Plan is eligible under CAP 138 **and** a stand-alone organic transition plan will be allowed.
- ► CDFA is evaluating the inclusion of the Fish and Wildlife Plan for funding in CAPGP.

### **Next Steps**

- CDFA is reviewing the most recent EQIP payment rates
- Rates related to Carbon Farm Plans are under review
  - ► Conservation Planning Activity (CPA) 199
  - ► Carbon Sequestration and Greenhouse Gas Mitigation Assessment (CEMA) 218

### Thank you!

Questions?

Contact us: <a href="mailto:cdfa.ca.gov">cdfa.oefi@cdfa.ca.gov</a>



Organization/Entity	Summary of Comments	Response to Comment
Yurok Tribe	<ol> <li>Clarify whether non-timber forest products (such as acorns) would be considered an eligible cropping system. If this was the case, this would provide opportunity for culturally relevant traditional food to be included.</li> <li>Allow federally negotiated indirect cost rates.</li> <li>Set aside some funding to be used by Tribes to pursue training for tribal employees so that they could become eligible for the CAPGP funding in future rounds.</li> <li>CDFA should be inclusive of traditional ecological knowledge and experience when evaluating qualifications for grant funding.</li> <li>Supports the prioritization of 25% of funds to assist Socially Disadvantaged Farmers and Ranchers and farms 500 acres or less.</li> <li>Supports the provision of 25% advanced payments.</li> </ol>	<ol> <li>Culturally relevant traditional foods can be included in planning grants.</li> <li>A general indirect rate of 20% has been established for applicants to the CDFA Conservation Agriculture Planning Grant Program.</li> <li>CDFA will evaluate further request for training.</li> <li>CDFA will consider traditional ecological knowledge and experience when evaluating planning grant proposals that align with the expertise.</li> </ol>
FWE Sustainable Resource Solutions	Anaerobic digester developers should be considered eligible applicants.	CDFA does not have information regarding the planning qualifications of dairy digester developer businesses. Individuals employed in the anerobic digester industry may be eligible for planning grants if they are listed as a Technical Service Provider (TSP) by USDA NRCS or if they meet the requirements for eligible entities/individuals.

Organization/Entity	Summary of Comments	Response to Comment
American Farmland Trust	<ol> <li>Within the Background of the Request for Grant Applications, indicate that water availability is a climate change impact.</li> <li>Add Groundwater Sustainability Agencies and local agencies and eligible entities.</li> <li>Prioritize projects that address water use and help farmers that are at risk of fallowing due to water shortage in areas identified by DWR as high and medium priority basins.</li> <li>Award a groundwater related project in each high priority basin (as identified by DWR) and prioritize grant proposals in medium priority basins.</li> </ol>	<ol> <li>CDFA will clarify that uncertainty and stressed water supply are impacts of climate change by adding the following language, "CSA addresses risks that climate changes poses to agriculture, including drought and uncertain water availability".</li> <li>CDFA will add GSAs to the list of eligible entities.</li> <li>Due to the many competing priorities created by climate change impacts, CDFA will award projects based upon the minimum qualification criteria and will not place additional priority upon certain plans or geographies with exception for organic transition plans for which \$7 M has been specified in statutory budget language for organic transition plans. Several other CDFA OEFI incentive programs place emphasis on water supply and adaptation to water supply impacts including the SWEEP and WETA programs.</li> <li>The CAPGP is intended to be broad in the types of plans that are supported. Water specific programs such as SWEEP and WETA are available to address water efficiency and water conservation. SWEEP gives additional consideration to projects that reduce pumping from critically overdrafted groundwater basins.</li> </ol>

Organization/Entity	Summary of Comments	Response to Comment
Madera County Department of Water and Natural Resources	<ol> <li>Within the Background of the Request for Grant Applications, indicate that water availability is a climate change impact.</li> <li>Add Groundwater Sustainability Agencies and local agencies and eligible entities.</li> <li>Prioritize projects that address water use and help farmers that are at risk of fallowing due to water shortage in areas identified by DWR as high and medium priority basins.</li> <li>Award a groundwater related project in each high priority basin (as identified by DWR) and prioritize grant proposals in medium priority basins.</li> </ol>	<ol> <li>CDFA will clarify that uncertainty and stressed water supply are impacts of climate change by adding the following language, "CSA addresses risks that climate changes poses to agriculture, including drought and uncertain water availability".</li> <li>CDFA will add GSAs to the list of eligible entities.</li> <li>Due to the many competing priorities created by climate change impacts, CDFA will award projects based upon the minimum qualification criteria and will not place additional priority upon certain plans or geographies with exception for organic transition plans for which \$7 M has been specified in statutory budget language for organic transition plans. Several other CDFA OEFI incentive programs place emphasis on water supply and adaptation to water supply impacts including the SWEEP and WETA programs.</li> <li>The CAPGP is intended to be broad in the types of plans that are supported. Water specific programs such as SWEEP and WETA are available to address water efficiency and water conservation. SWEEP gives additional consideration to projects that reduce pumping from critically overdrafted groundwater basins.</li> </ol>

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

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

Organization/Entity	Summary of Comments	Response to Comment
Roots of Change	<ol> <li>Within the Background of the Request for Grant Applications, indicate that water availability is a climate change impact.</li> <li>Add Groundwater Sustainability Agencies and local agencies and eligible entities.</li> <li>Prioritize projects that address water use and help farmers that are at risk of fallowing due to water shortage in areas identified by DWR as high and medium priority basins.</li> <li>Award a groundwater related project in each high priority basin (as identified by DWR) and prioritize grant proposals in medium priority basins.</li> </ol>	<ol> <li>CDFA will clarify that uncertainty and stressed water supply are impacts of climate change by adding the following language, "CSA addresses risks that climate changes poses to agriculture, including drought and uncertain water availability".</li> <li>CDFA will add GSAs to the list of eligible entities.</li> <li>Due to the many competing priorities created by climate change impacts, CDFA will award projects based upon the minimum qualification criteria and will not place additional priority upon certain plans or geographies with exception for organic transition plans for which \$7 M has been specified in statutory budget language for organic transition plans. Several other CDFA OEFI incentive programs place emphasis on water supply and adaptation to water supply impacts including the SWEEP and WETA programs.</li> <li>The CAPGP is intended to be broad in the types of plans that are supported. Water specific programs such as SWEEP and WETA are available to address water efficiency and water conservation. SWEEP gives additional consideration to projects that reduce pumping from critically overdrafted groundwater basins.</li> </ol>

Organization/Entity	Summary of Comments	Response to Comment
Audubon California  California Certified	Include United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Fish and Wildlife Habitat Plans (PAC 142) as a plan eligible for funding through the Conservation Agriculture Planning Grant Program.  1. Clarify if a stand-alone organic system plan is	CDFA is evaluating the inclusion of the Fish and Wildlife Plan for funding in CAPGP.  1. CDFA has clarified that the Organic
Organic Farmers (CCOF) and Agriculture and Land-Based Training Association (ALBA)	eligible for funding through the program.  2. Create an organic transition program with the \$7 million including the 2021-2022 state budget for organic transition. The organic transition program should include:  a) Grants to farmers and ranchers for implementation of practices that build soils and biologically manage pests while offsetting the economic risk of transitioning to organic production.  b) Mentorship of transitioning farmers and ranchers by experienced organic producers. Mentors should be compensated for their time.  c) Research, education, and technical assistance grants to build capacity of technical assistance providers to support organic transition with resources that are culturally and linguistically appropriate.  d) Regional food system grants that expand local markets for organically produced food, creating opportunities for new and existing organic producers.  3. CDFA should consider ways to support secure land tenure.	Systems Plan is eligible under CAP 138 and a stand-alone organic transition plan will be allowed.  2. CAPGP is designed to fund planning activities only. The \$7 million will be reserved for funding CAP 138 and Organic System Plans.  3. Land tenure is out of the scope of the CAPGP program.

Organization/Entity	Summary of Comments	Response to Comment
Assemblymember Carlos Villapudua (13th District)	<ol> <li>Within the Background of the Request for Grant Applications, indicate that water availability is a climate change impact.</li> <li>Add Groundwater Sustainability Agencies and local agencies and eligible entities.</li> <li>Prioritize projects that address water use and help farmers that are at risk of fallowing due to water shortage in areas identified by DWR as high and medium priority basins.</li> <li>Award a groundwater related project in each high priority basin (as identified by DWR) and prioritize grant proposals in medium priority basins.</li> </ol>	<ol> <li>CDFA will clarify that uncertainty and stressed water supply are impacts of climate change by adding the following language, "CSA addresses risks that climate changes poses to agriculture, including drought and uncertain water availability".</li> <li>CDFA will add GSAs to the list of eligible entities.</li> <li>Due to the many competing priorities created by climate change impacts, CDFA will award projects based upon the minimum qualification criteria and will not place additional priority upon certain plans or geographies with exception for organic transition plans for which \$7 M has been specified in statutory budget language for organic transition plans. Several other CDFA OEFI incentive programs place emphasis on water supply and adaptation to water supply impacts including the SWEEP and WETA programs.</li> <li>The CAPGP is intended to be broad in the types of plans that are supported. Water specific programs such as SWEEP and WETA are available to address water efficiency and water conservation. SWEEP gives additional consideration to projects that reduce pumping from critically overdrafted groundwater basins.</li> </ol>

#### Natural Resources Defense Council

- 1. Explain how CDFA determined which plans would get funded through CAPGP and justify determinations in a climate context.
- 2. Include water efficiency and water conservation as a climate adaptation strategy in the background.
- 3. Include funding for conservation plans that increase riparian buffer reforestation and riparian herbaceous cover.
- 4. Prioritize funding for TAPs who develop comprehensive farm plans for growers in areas that maximize soil carbon sequestration, biodiversity protections, and water conservation.
- 5. Add State Conservancies to the list of eligible entities in CAPGP.
- 6. Create a separate organic transition program instead of including organic assistance through CAPGP.
- 7. Provide clarity that CAPGP funds will be administered through a competitive grant process instead of a first-come, first-served process.

- The plans that were selected for inclusion in CAPGP have a relationship with or support the activities that can be funded through the incentive programs administered by the Office of Environmental Farming and Innovation.
- 2. CDFA will clarify that uncertainly and stressed water supply is an impact of climate change.
- 3. The NRCS practices of riparian buffer and riparian herbaceous cover may be included in some of the plans that have been proposed for inclusion in CAPGP including Carbon Farm Plans and Pollinator Habitat Plans.
- 4. Due to the many competing priorities created by climate change impacts, CDFA will award projects based upon the minimum qualification criteria and will not place additional priority upon certain plans or geographies with exception for organic transition plans for which \$7 M has been specified in statutory budget language for organic transition plans. Several other CDFA OEFI incentive programs place emphasis on water supply and adaptation to water supply impacts including the SWEEP and WETA programs.
- 5. State Conservancies are state agencies and are not eligible. Non-profits that work closely with State Conservancies may be eligible if they demonstrate qualifications.
- 6. CDFA CAPGP will fund CAP 138 and organic transition plans. CAPGP is not

Organization/Entity	Summary of Comments	Response to Comment
		designed to fund organic transition activities.  7. The CAPGP program will be administered as a first-come, first-serve program with criteria for minimum qualifications.
Association of California Water Agencies	<ol> <li>Add Groundwater Sustainability Agencies         (GSA) and local agencies and eligible entities.</li> <li>Prioritize projects that address water use and help farmers that are at risk of fallowing due to water shortage in areas identified by DWR as high and medium priority basins.</li> <li>Within the Background of the Request for Grant Applications, indicate that water availability is a climate change impact.</li> </ol>	<ol> <li>CDFA will add GSAs to the list of eligible entities.</li> <li>The CAPGP is intended to be broad in the types of plans that are supported. Water specific programs such as SWEEP and WETA are available to address water efficiency and water conservation. SWEEP gives additional consideration to projects that reduce pumping from critically overdrafted groundwater basins.</li> <li>CDFA will clarify that uncertainty and stressed water supply are impacts of climate change by adding the following language, "CSA addresses risks that climate changes poses to agriculture, including drought and uncertain water availability".</li> </ol>

Organization/Entity	Summary of Comments	Response to Comment
California Apple Commission	<ol> <li>Clarify if a stand-alone organic system plan is eligible for funding through the program.</li> <li>Create an organic transition program with the \$7 million including the 2021-2022 state budget for organic transition. The organic transition program should include:         <ul> <li>a) Grants to farmers and ranchers for implementation of practices that build soils and biologically manage pests while offsetting the economic risk of transitioning to organic production.</li> <li>b) Mentorship of transitioning farmers and ranchers by experienced organic producers. Mentors should be compensated for their time.</li> <li>c) Research, education, and technical assistance grants to build capacity of technical assistance providers to support organic transition with resources that are culturally and linguistically appropriate.</li> <li>d) Regional food system grants that expand local markets for organically produced food, creating opportunities for new and existing organic producers.</li> </ul> </li> </ol>	<ol> <li>CDFA has clarified that the Organic Systems Plan is eligible under CAP 138 and a stand-alone organic transition plan will be allowed.</li> <li>CAPGP is designed to fund planning activities only. The \$7 million will be reserved for funding CAP 138 and Organic System Plans.</li> </ol>

Organization/Entity	Summary of Comments	Response to Comment
California Blueberry Commission	<ol> <li>Clarify if a stand-alone organic system plan is eligible for funding through the program.</li> <li>Create an organic transition program with the \$7 million including the 2021-2022 state budget for organic transition. The organic transition program should include:         <ul> <li>a) Grants to farmers and ranchers for implementation of practices that build soils and biologically manage pests while offsetting the economic risk of transitioning to organic production.</li> <li>b) Mentorship of transitioning farmers and ranchers by experienced organic producers. Mentors should be compensated for their time.</li> <li>c) Research, education, and technical assistance grants to build capacity of technical assistance providers to support organic transition with resources that are culturally and linguistically appropriate.</li> <li>d) Regional food system grants that expand local markets for organically produced food, creating opportunities for new and existing organic producers.</li> </ul> </li> </ol>	<ol> <li>CDFA has clarified that the Organic Systems Plan is eligible under CAP 138 and a stand-alone organic transition plan will be allowed.</li> <li>CAPGP is designed to fund planning activities only. The \$7 million will be reserved for funding CAP 138 and Organic System Plans.</li> </ol>

Organization/Entity	Summary of Comments	Response to Comment
California Wild Rice Advisory Board	<ol> <li>Clarify if a stand-alone organic system plan is eligible for funding through the program.</li> <li>Create an organic transition program with the \$7 million including the 2021-2022 state budget for organic transition. The organic transition program should include:         <ul> <li>a) Grants to farmers and ranchers for implementation of practices that build soils and biologically manage pests while offsetting the economic risk of transitioning to organic production.</li> <li>b) Mentorship of transitioning farmers and ranchers by experienced organic producers. Mentors should be compensated for their time.</li> <li>c) Research, education, and technical assistance grants to build capacity of technical assistance providers to support organic transition with resources that are culturally and linguistically appropriate.</li> <li>d) Regional food system grants that expand local markets for organically produced food, creating opportunities for new and existing organic producers.</li> </ul> </li> </ol>	<ol> <li>CDFA has clarified that the Organic Systems Plan is eligible under CAP 138 and a stand-alone organic transition plan will be allowed.</li> <li>CAPGP is designed to fund planning activities only. The \$7 million will be reserved for funding CAP 138 and Organic System Plans.</li> </ol>

Organization/Entity	Summary of Comments	Response to Comment
Olive Growers Council of California	<ol> <li>Clarify if a stand-alone organic system plan is eligible for funding through the program.</li> <li>Create an organic transition program with the \$7 million including the 2021-2022 state budget for organic transition. The organic transition program should include:         <ul> <li>a) Grants to farmers and ranchers for implementation of practices that build soils and biologically manage pests while offsetting the economic risk of transitioning to organic production.</li> <li>b) Mentorship of transitioning farmers and ranchers by experienced organic producers. Mentors should be compensated for their time.</li> <li>c) Research, education, and technical assistance grants to build capacity of technical assistance providers to support organic transition with resources that are culturally and linguistically appropriate.</li> <li>d) Regional food system grants that expand local markets for organically produced food, creating opportunities for new and existing organic producers.</li> </ul> </li> </ol>	<ol> <li>CDFA has clarified that the Organic Systems Plan is eligible under CAP 138 and a stand-alone organic transition plan will be allowed.</li> <li>CAPGP is designed to fund planning activities only. The \$7 million will be reserved for funding CAP 138 and Organic System Plans.</li> </ol>

Organization/Entity	Summary of Comments	Response to Comment
Pesticide Action Network and Californians for Pesticide Reform	<ol> <li>Move beyond plans to action/implementation; add IPM strategies to Healthy Soils Program instead of CAPGP</li> <li>Consider creating a research, education, and technical assistance grant program to assess needs of producers and provide technical assistance and research for producers transitioning to organic and IPM practices that reduce pesticide use.</li> <li>Create a standalone organic transition program that includes:         <ul> <li>Grants to farmers and ranchers for implementation of practices that build soils and biologically manage pests while offsetting the economic risk of transitioning to organic production.</li> <li>Mentorship of transitioning farmers and ranchers by experienced organic producers.</li> <li>Research, education, and technical assistance grants to build capacity of technical assistance providers to support organic transition with resources that are culturally and linguistically appropriate.</li> <li>Regional food system grants that expand local markets for organically produced food, creating opportunities for new and existing organic producers.</li> </ul> </li> </ol>	<ol> <li>The Healthy Soils Program has an established process for inclusion of new practices. The CAPGP program is created to provide funding for planning activities.</li> <li>This is out of the scope of the CAPGP program</li> <li>CDFA CAPGP is designed to only fund planning activities. The \$7 million will be reserved for funding CAP 138 or Organic System Plans.</li> </ol>

Organization/Entity	Summary of Comments	Response to Comment
California Association of Resource Conservation Districts	<ol> <li>Allow higher indirect rates on a case-by-case basis rather than having a 20% cap for all.</li> <li>Allow for reimbursement of actual costs, rather than using standard payment rates.</li> <li>Remove or revise Critical Project Review Requirements.</li> <li>Make administrative costs related to project management, tracking of budget and deliverables, and regular invoicing and reporting an allowable expense.</li> <li>Have applications be accepted on a rolling basis.</li> <li>Withholding 10% can be onerous for small entities.</li> </ol>	<ol> <li>A general indirect rate of 20% has been established for applicants to the CDFA Conservation Agriculture Planning Grant Program.</li> <li>A cost payment structure for this planning program is aligned with USDA NRCS and supports the administration of the program within CDFA. An itemized budget will require increased administrative capacity within OEFI and will burden participants with additional reporting and substantiation of cost.</li> <li>CDFA will retain the requirements outlined in the draft RGA regarding Critical Project Review. This language is aligned with critical project review requirements across OEFI programs.</li> <li>Administrative costs may be included in indirect costs.</li> <li>Applications will be accepted on a first-come, first-served (rolling) basis and awarded based upon meeting minimum qualifications.</li> <li>CDFA withholds 10% of the award until project completion is verified in all of OEFI's programs. In the case of CAPGP, the awardee will provide all deliverables (plans) and a final report will be approved before the 10% is released. This withhold ensure a minimum level of governmental accountability for the funds dispersed.</li> </ol>

# Comments from the Yurok Tribe on the CAPGP Draft Request for Proposals

#### Page: 3

Number: 1 Author: tthompson Subject: Comment on Text Date: 9/20/2021 5:35:19 PM

Does this include non-timber forest products, such as acorns, that require land management? That would be helpful to include for Tribes, as it would open up the opportunity to include culturally relevant traditional foods within the definition.

Number: 2 Author: tthompson Subject: Comment on Text Date: 9/20/2021 5:36:37 PM

Thank you for allowing a higher amount than many other state grants! I think even more tribal applicants would be able to pursue this funding if federally negotiated indirect cost rates could be applied to this grant.

Number: 3 Author: tthompson Subject: Comment on Text Date: 9/20/2021 5:49:11 PM

It would be great if there were an opportunity for Tribes to apply for funding to build the capacity to provide this kind of expertise to their communities. Maybe a subsection of this grant could be funding to allow Tribes to train their employees in the following expertise areas as a way to prepare them to submit a full application the following year (or later on). This will increase accessibility of training programs to Tribal food producers by helping Tribes gain the expertise to provide it directly.

#### Page: 4

Number: 1 Author: tthompson Subject: Comment on Text Date: 9/20/2021 5:39:22 PM

Many Tribal applicants may seek to implement traditional land management practices, which are difficult to provide proof of qualifications for. Maybe something can be done to be inclusive of traditional ecological knowledge and experiences?

#### Page: 5

Number: 1 Author: tthompson Subject: Comment on Text Date: 9/20/2021 5:51:24 PM

Thank you for including this. These priorities will help make those serving tribal communities more competitive.

Number: 2 Author: tthompson Subject: Comment on Text Date: 9/20/2021 5:41:36 PM

Thank you for including this. This helps address a huge barrier for many Tribal applicants.

From: Malcolm O'Meara <malcolm.omeara@fwe.energy>

Sent: Friday, September 24, 2021 10:37 AM

To: CDFA OEFI@CDFA

**Subject:** The CAPGP workshop - follow up question

**Attachments:** 

Hello,

With reference to yesterday's CDFA CAPGP Stakeholder Workshop.

We are a California registered affiliate of a German anaerobic digester project development company. We fabricate, develop, install, operate and maintain our own compact AD system for small to medium sized dairies. I attach a photo of the standardized plug flow plus stirred tank design. This system is economically viable for herds sized between 500 and 1,500 cows.

The main challenge in developing AD projects is financing the pre-development work needed to get permits. Once permits are in place, there are a large number of private investment companies actively seeking out projects for construction and or operational investment. It is expected that the volume of private investment looking for placement in renewable projects will continue to grow rapidly.

The secondary challenge is finding the qualified and experienced technical assistance to structure and organize the planning and permitting work. Your Conservation Agriculture Planning Grants Program (CAPGP) seems to address the first of these challenges. The availability of officially certified TAs with relevant knowledge of and experience with plug flow and CSTR systems remains limited.

On page 8 of your workshop presentation, you address this shortage by adding "Certified professionals (including, but not limited to: Certified Crop Advisor, Pest Control Advisor, Certified Rangeland Manager) as eligible applicants".

We have specific dairies in the Santa Rosa basin that we wish to pre-qualify for private funding through permit development.

For the past year and a half, we have worked closely with the NRCS in Petaluma to visit and get to know dairy owners in Marin and Sonoma counties. I am confident that the staff there in Petaluma as well as the AD engineers in Fresno will testify to our qualification and expertise.

Can you tell me whether we as an AD development company with a staff of highly experienced engineers and wastewater professionals working remotely from Germany, can qualify as an eligible applicant under the CAPG program?

With best regards

#### Malcolm O'Meara

General Manager US FWE Sustainable Resource Solutions Sebastopol, CA 95472 Tel: 707 508 9163 www.fwe.energy



October 13, 2021

Secretary Karen Ross California Department of Food and Agriculture 1220 N Street Sacramento, CA 95814

Comments Submitted via: cdfa.oefi@cdfa.ca.gov

#### American Farmland Trust Comments on the 2021 Conservation Agriculture Planning Grants Program Draft Request for Proposals

#### Dear Secretary Ross,

American Farmland Trust (AFT), now in our 41<sup>st</sup> year, created the conservation agriculture movement, which speaks for the land—and for the people who grow our food. As the movement's leaders, and a national agricultural land trust, we have three priorities: *protecting agricultural land, promoting environmentally sound farming practices, and keeping farmers on the land.* 

We are offering these comments in addition to our previous comments submitted in coordination with the Carbon Cycle Institute.

These comments focus on the opportunity for the California Department of Food and Agriculture to create a program that not only addresses climate solutions, but also can address the need for farmers and ranchers to create conservation plans to address and prepare for the successful implementation of the Sustainable Groundwater Management Act or SGMA.

In January 2021, Assembly Member Villapudua introduced <u>Assembly Bill (AB) 350 Agriculture:</u> <u>Cannella Environmental Farming Act of 1995: technical assistance grant program: groundwater conservation planning<sup>1</sup>.</u> As sponsor, AFT recognizes the urgent need to support farmers and ranchers who are in the throes of a drought, changing climate, and an impending need to balance our water basins through successful implementation of SGMA. The Public Policy Institute of California<sup>2</sup> anticipates approximately 500,000 acres in the San Joaquin Valley will be required to be repurposed or change current use while other sources estimate topping 1 million acres. Likewise, farmers and ranchers in the Klamath region of the state are also facing significant challenges related to water availability and could benefit from an expanded scope in CDFA's Conservation Agriculture Planning Grants Program.

We offer the following priorities for consideration and integration in this program:

- 1.) Create explicit language in the <u>Background</u> section of the document to include water availability as a climate change impact.
- 2.) Under the <u>Eligibility</u> section, CDFA should also include Groundwater Sustainability Agencies, and local agencies.

<sup>&</sup>lt;sup>1</sup> Assembly Bill (AB) 350 Agriculture: Cannella Environmental Farming Act of 1995: technical assistance grant program: groundwater conservation planning.

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill id=202120220AB350.

<sup>&</sup>lt;sup>2</sup> Public Policy Institute Water and the Future of the San Joaquin Valley. February, 2019. <a href="https://www.ppic.org/wp-content/uploads/water-and-the-future-of-the-san-joaquin-valley-overview.pdf">https://www.ppic.org/wp-content/uploads/water-and-the-future-of-the-san-joaquin-valley-overview.pdf</a>.

- 3.) Under <u>Program Requirements</u>, CDFA should include prioritization for applicants proposing projects that will address water use, and address helping farmers who are at risk of fallowing due to water shortages to avoid permanent fallowing where possible in groundwater basins designated as high and medium priority basins by the Department of water resources.
- 4.) Also under <u>Program Requirements</u>, CDFA should require one groundwater related grant award in each high priority basin (as defined by the Department of Water Resources), and prioritize grant proposals in medium priority basin (as defined by the Department of Water Resources) to ensure broad geographic and regional support.

We believe these recommendations will work to advance scaling up conservation on California farms and ranches and will work to increase the program's goals and reach, especially while the state is working to implement SGMA for water resiliency. Should you have any questions regarding these comments, please contact Rebecca Marcus at <a href="mailto:rebecca@marcusgovstrategies.com">rebecca@marcusgovstrategies.com</a>.

Sincerely, Katie Patterson

California Policy Manager American Farmland Trust

Katu Patterson



October 15, 2021

Secretary Karen Ross California Department of Food and Agriculture 1220 N Street Sacramento, CA 95814

Comments Submitted via: cdfa.oefi@cdfa.ca.gov

# Madera County Department of Water and Natural Resources Comments on the 2021 Conservation Agriculture Planning Grants Program Draft Request for Proposals

#### Dear Secretary Ross,

These comments focus on the opportunity for the California Department of Food and Agriculture to create a program that not only addresses climate solutions, but also can address the need for farmers and ranchers to create conservation plans to address and prepare for the successful implementation of the Sustainable Groundwater Management Act or SGMA in high and medium priority groundwater basins.

In January 2021, Assembly Member Villapudua introduced <u>Assembly Bill (AB) 350 Agriculture: Cannella Environmental Farming Act of 1995: technical assistance grant program: groundwater conservation planning<sup>1</sup>. As a supporter of AB 350, Madera County Groundwater Sustainability Agencies recognizes the urgent need to support farmers and ranchers who are in the throes of a drought, changing climate, and an impending need to balance our water basins through successful implementation of SGMA. The Public Policy Institute of California<sup>2</sup> anticipates approximately 500,000 acres in the San Joaquin Valley will be required to be repurposed or change current use, while other sources estimate more than 1 million acres. Likewise, farmers and ranchers in the Klamath region of the state are also facing significant challenges related to water availability and could benefit from an expanded scope in CDFA's Conservation Agriculture Planning Grants Program.</u>

We offer the following priorities for consideration and integration in this program:

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill id=202120220AB350.

<sup>&</sup>lt;sup>2</sup> Public Policy Institute Water and the Future of the San Joaquin Valley. February, 2019. <a href="https://www.ppic.org/wp-content/uploads/water-and-the-future-of-the-san-joaquin-valley-overview.pdf">https://www.ppic.org/wp-content/uploads/water-and-the-future-of-the-san-joaquin-valley-overview.pdf</a>.



<sup>&</sup>lt;sup>1</sup> Assembly Bill (AB) 350 Agriculture: Cannella Environmental Farming Act of 1995: technical assistance grant program: groundwater conservation planning.



- 1.) Create explicit language in the <u>Background</u> section of the document to include water availability as a climate change impact.
- 2.) Under the <u>Eligibility</u> section, CDFA should also include Groundwater Sustainability Agencies, and local agencies.
- 3.) Under <u>Program Requirements</u>, CDFA should include prioritization for applicants proposing projects that will address water use, and address helping farmers who are at risk of fallowing due to water shortages to avoid permanent fallowing where possible in groundwater basins designated as high and medium priority basins by the Department of Water Resources.
- 4.) Also under <u>Program Requirements</u>, CDFA should require one groundwater related grant award in each high priority basin (as defined by the Department of Water Resources), and prioritize grant proposals in medium priority basin (as defined by the Department of Water Resources) to ensure broad geographic and regional implementation.

We believe these recommendations will work to advance scaling up conservation on California farms and ranches and will work to increase the program's goals and reach, especially while the state is working to implement SGMA for water resiliency. Thank you for your consideration of these recommendations.

Sincerely,

Stephanie Anagnoson

Director of Water and Natural Resources

uphena

Madera County





Public Comment for CDFA's Conservation Agriculture Planning Grants Program (CAPGP)

10/19/2021

#### **Promoting Biochar to Advance California's Climate Goals**

Biochar is well known for its many contributions to soil health, including a variety of ecosystem services such as water retention, supporting biodiversity, and increasing productivity of the state's essential agricultural sector. Less recognized is its potential to contribute to long-term carbon sequestration, particularly through stabilization of waste biomass that would otherwise be burnt or decompose into methane and other greenhouse gas emissions. It is essential for leading state agencies, including CDFA and CARB, to recognize biochar's mitigation potential for several reasons:

- 1. Biochar is charcoal made from biomass. In soil, biochar increases nutrient retention, supports microbial functions and enhances water availability. Biochar is found in soils around the world as a result of both natural vegetation fires and historic soil management practices like those of the indigenous Amazonians who created the black soils known as Terra Preta. Modern biochar production promises additional benefits in the form of increased carbon sequestration and co-production of renewable energy. Energy can be captured in the form of oil and/or gas released by the biochar production process.
- 2. The carbon in biochar resists degradation and remains in soils for hundreds to thousands of years. Because this carbon came from biomass that would otherwise have decomposed into greenhouse gasses within a few years, biochar is a carbon sequestration method with many side benefits. Added to soils, compost piles, and other wastes, biochar can also reduce emissions of nitrous oxide and methane, two potent greenhouse gasses.
- 3. California currently produces more than 54MT of waste biomass per year, representing an "emissions overhang" of organic material that threatens more immediate release of methane and other greenhouse gases through burning and/or decomposition. Today, the volume of this waste is accelerating because of more determined public and private wildfire risk management strategies, while burning restrictions are increasing the biomass loads of state landfills.



#### Public Comment for CDFA's Conservation Agriculture Planning Grants Program (CAPGP)

Biochar needs to be officially recognized and incentivized for its mitigation potential. This will increase incentives to use biochar for healthier soils, reduce emissions from burning and biomass decomposition, and promote innovation to develop more stable and carbon-retentive biochar. We recommend that CDFA work with CARB to develop a certification program that grades biochar for sequestration potential, rewarding innovation for sustained food security, habitat, and lasting, nature-based climate solutions.

Thank you for your consideration.

Respectfully,
Kieran Mitchell, CEO
<u>kieran@cariboubiofuels.com</u>
510-421-0365



October 18, 2021

Karen Ross Secretary California Department of Food and Agriculture 1220 N Street Sacramento, CA 95814

Comments Submitted via: cdfa.oefi@cdfa.ca.gov

#### Roots of Change Comments on the 2021 Conservation Agriculture Planning Grants Program Draft Request for Proposals

#### **Dear Secretary Ross:**

These comments focus on the opportunity for the California Department of Food and Agriculture to create a program that not only addresses climate solutions, but also can address the need for farmers and ranchers to create conservation plans to address and prepare for the successful implementation of the Sustainable Groundwater Management Act or SGMA in high and medium priority groundwater basins.

In January 2021, Assembly Member Villapudua introduced <u>Assembly Bill (AB) 350 Agriculture:</u> <u>Cannella Environmental Farming Act of 1995: technical assistance grant program: groundwater conservation planning<sup>1</sup>.</u> As a supporter of AB 350, ROC recognizes the urgent need to support farmers and ranchers who are in the throes of a drought, changing climate, and an impending need to balance our water basins through successful implementation of SGMA. The Public Policy Institute of California<sup>2</sup> anticipates approximately 500,000 acres in the San Joaquin Valley will be required to be repurposed or change current use, while other sources estimate more than 1 million acres. Likewise, farmers and ranchers in the Klamath region of the state are also facing significant challenges related to water availability and could benefit from an expanded scope in CDFA's Conservation Agriculture Planning Grants Program.

We join many others focused in this challenge in offering the following priorities for consideration and integration in this program:

- 1.) Under the <u>Background</u> section: **create** explicit language to include water availability as a climate change impact.
- 2.) Under the Eligibility section: include Groundwater Sustainability Agencies, and local agencies.
- 3.) Under <u>Program Requirements section</u>,
  a) **include** prioritization for applicants proposing projects that will address water use, and that help farmers at risk of fallowing due to water shortages to avoid permanent fallowing where possible in groundwater basins designated as high and medium priority basins by the Department of Water Resources;

<sup>&</sup>lt;sup>1</sup> Assembly Bill (AB) 350 Agriculture: Cannella Environmental Farming Act of 1995: technical assistance grant program: groundwater conservation planning. https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill\_id=202120220AB350.

<sup>&</sup>lt;sup>2</sup> Public Policy Institute Water and the Future of the San Joaquin Valley. February, 2019. <a href="https://www.ppic.org/wp-content/uploads/water-and-the-future-of-the-san-joaquin-valley-overview.pdf">https://www.ppic.org/wp-content/uploads/water-and-the-future-of-the-san-joaquin-valley-overview.pdf</a>.

b) **require** one groundwater related grant award in each high priority basin (as defined by the Department of Water Resources) and prioritize grant proposals in medium priority basin (as defined by the Department of Water Resources) to ensure broad geographic and regional implementation.

We believe these recommendations will help scale up conservation on California farms and ranches and increase the program's goals and reach. This particularly important while the state is working to implement SGMA for water resiliency.

Thank you for your consideration of these recommendations.

melnil

Sincerely,

Michael R. Dimock

Program Director



220 Montgomery Street Suite 1000 San Francisco, CA 94104

415.644.4600 ca.audubon.org

October 18, 2021

Office of Environmental Farming and Innovation California Department of Food and Agriculture 1220 N Street Sacramento, CA 95814

Re: Comments on the Conservation Agriculture Planning Grant Program Draft RFP

Dear OEFI Staff:

I write on behalf of Audubon California in support of CDFA's Conservation Agriculture Planning Grant Program. We appreciate the opportunity to comment on the program's draft Request for Proposals.

The demand for technical assistance to farmers and ranchers to develop management plans to achieve conservation goals is high, and exceeds the current capacity of existing providers. This new program will be an important step to help meet the existing demand. Except for Pollinator Habitat Plans, the draft does not include funding for plans that focus on improving habitat for fish and wildlife species. We encourage CDFA to include NRCS Fish and Wildlife Habitat Plans (PAC 142) as eligible for funding under the Conservation Agriculture Planning Grant Program.

Audubon has recently launched the Audubon Conservation Ranching Initiative which provides market-based incentives to ranchers that provide and improve habitat for bird species in addition to other environmental benefits such as soil health, climate mitigation, drought resilience and better habitat for pollinators. Participating ranchers agree to adopt initiative standards and implement a Habitat Management Plan (HMP) developed in cooperation with Audubon or an agency partner. The plan outlines steps to build better habitat for birds and other wildlife, while being responsive to practical ranch management considerations and the economic needs of the operation. Audubon's Habitat Management Plans are similar in structure as NRCS Fish and Wildlife Habitat Plans. Audubon is working to ensure that all HMPs are fully compatible with the Natural Resource Conservation Service Fish and Wildlife Habitat Plans to simplify the process for producers seeking funding from NRCS programs.

Including NRCS Fish and Wildlife Habitat Plans as eligible for funding under the Conservation Agriculture Planning Grant Program would allow farmers and ranchers to enhance habitat for wildlife and mitigate the effects of climate change. It would also help California meet the goals of the State Wildlife Action Plan and the Governor's Executive Order N-82-20.

Thank you for the opportunity to provide recommendations on this draft RFP.

Sincerely,

Pelayo Alvarez, PhD California Director

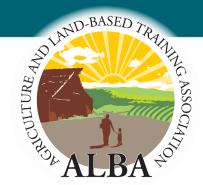
Audubon Conservation Ranching Program

530-304-0781



### **CCOF**

Advancing organic agriculture through certification, education, advocacy, and promotion.



October 19, 2021

Office of Environmental Farming and Innovation California Department of Food and Agriculture 1220 N Street Sacramento, CA 95814

RE: CCOF & ALBA comment letter on CDFA's proposed Conservation Agriculture Planning Grant Program

Submitted via email at cdfa.oefi@cdfa.ca.gov

Dear Office of Environmental Farming and Innovation:

California Certified Organic Farmers (CCOF) and the Agriculture and Land-Based Training Association (ALBA) appreciate the opportunity to comment on California Department of Food and Agriculture's (CDFA) Draft Request for Proposals for the 2021 Conservation Agriculture Planning Grant Program (CAPGP).

CCOF is a nonprofit organization that represents over 3,000 organic farms, ranches, and businesses throughout California. We advance organic agriculture for a healthy world through education, advocacy, and certification. For nearly 50 years, CCOF has shepherded farmers and ranchers through the organic certification process, and we ground our comment on the CAPGP in this expertise.

ALBA's Farmer Education and Enterprise Development project develops the organic farming skills of immigrant farmworkers to support a more equitable and environmentally sustainable agriculture sector. The project leverages ALBA's experienced bilingual staff, a proven consortium of farm service providers, and a 100-acre organic farm training facility in the Salinas Valley. Each year, some 75 limited-resource farmers gain affordable access to education, land, farming equipment and technical assistance. Through hands-on, land-based learning, they develop organic production and business management skills to pursue the dream of farm ownership or to find better jobs. Over 20 years, ALBA has trained 600 aspiring farmers, of whom over 200 launched a farm on our land and nearly 100 went on to farm independently.

CCOF and ALBA appreciate CDFA's commitment to providing farmers and ranchers a range of tools to combat climate change. The new CAPGP is one of these tools. We commend CDFA for improving the program by adding state-certified crop, pest control, and rangeland advisors as qualified applicants and enabling farmers and ranchers to apply directly for funds to develop an organic system plan. We ask CDFA to clarify that a standalone organic system plan is eligible for funding. Creating an organic system plan is the first step in transitioning to organic production.

While we support the inclusion of an organic system plan in the CAPGP, this planning program cannot substitute for a comprehensive organic transition program. The purpose of CAPGP is to fund the development of conservation plans, not implementation and not to provide the suite of tools and resources farmers and ranchers need to transition to organic production. An organic system plan is necessary to become certified organic; however, it is not sufficient to aid farmers and ranchers through this challenging process. The State included \$7 million in the FY21-22 California state budget for organic transition. The intention is to support organic transition, and CDFA is not required to limit these funds to organic

<sup>&</sup>lt;sup>1</sup> California Dept. of Food and Agriculture Office of Environmental Farming & Innovation. <u>Conservation Agriculture Planning Grant Program: Draft Request for Proposals.</u> pg. 2.

system planning. CCOF and ALBA urge CDFA to create an organic transition program and provide farmers and ranchers with an additional tool in the climate smart agriculture toolbox.

A successful organic transition program includes:

- Transition grants that directly support farmers and ranchers in implementing practices that build soils and biologically manage pests while offsetting the economic risk of transitioning to organic production
- Investment in mentorship of transitioning farmers and ranchers by seasoned organic producers
- Research, education, and technical assistance grants that build capacity of technical assistance providers to support transitioning farmers and ranchers with resources that are culturally and linguistically appropriate
- Regional food system grants that expand local markets for organically produced food, creating more opportunities for new and existing organic farmers and ranchers

#### **Transition Grants that Directly Support Farmers and Ranchers**

To transition land to certified organic production, farmers cannot apply prohibited materials, including synthetic pesticides and fertilizers, to the land for three years prior to their first certified organic harvest. Farmers do not receive the premium organic price during this three-year transition period and can experience yield losses and higher operating costs as the soil adjusts to biological management and the farmer learns and invests in new production, recordkeeping, and marketing practices. Ranchers face a higher cost of feed and new animal healthcare requirements that, in adherence to the systems approach taken by organic producers, focus on preventative rather than diagnostic care.

To overcome these barriers, we recommend an organic transition program that includes grants that directly support farmers and ranchers to implement the multiple healthy soils practices needed to become certified organic; hire consultants to support with translation, business planning, recordkeeping; and to develop new skills by attending conferences and networking with successful organic producers. Under this grant program, CDFA should consider pathways to support secure land tenure, which is the largest challenge for beginning, small- and mid-scale, and socially disadvantaged farmers and ranchers.

These direct transition grants would complement and build on CDFA's Healthy Soils Program (HSP) and CAPGP. Organic farmers and ranchers are often disadvantaged when applying for HSP incentive grants because the application process is first-come, first-serve whereas the proposals submitted by organic producers are more complicated and time-consuming to plan and prepare. Rather than prioritizing simple, single-practice proposals, direct assistance under an organic transition program would support farmers who must implement multiple soil building practices to meet the organic standards requirement of maintaining or improving soil quality. Transitioning farmers and ranchers could apply for funds under these direct transition grants to implement the range of practices outlined in their organic system plan. Alternatively, CDFA could amend the HSP to incentivize the implementation of multiple healthy soils practices.

#### **Investment in Mentorship**

In 2020, CCOF Foundation partnered with Anheuser-Busch (AB) to support farmers transitioning to organic production. As part of this program, CCOF Foundation hosted a year of intensive organic farming workshops for the AB agronomy team and barley growers in Idaho Falls. One of the key takeaways from this experience was the value of mentorship and peer-to-peer learning. Producers want to learn from their peers and benefit from networking with seasoned organic growers who can field questions and attend periodic farmer-led field days and tailgates focused on in-field issues. Producers involved in mentorship should be compensated for their time.

#### Research, Education, and Technical Assistance Grants

<sup>&</sup>lt;sup>2</sup> General. (2018). U.S. Government Printing Office, Electronic Code of U.S. Federal Regulations, Title 7, Subtitle B, Chapter I, Subchapter M, Organic Foods Production Act Provisions Part 205. 7 CFR §205.200.
Page 2 of 3

California leads the nation in organic agriculture with organic acreage, number of farms, and crop value at least twice as high as the next leading state.<sup>3</sup> However, when measured per economic unit of agricultural production, California ranks 38th nationally in public funding for agricultural research and Cooperative Extension,<sup>4</sup> and over the past 20 years the total number of UC Specialists and Farm Advisors has dropped precipitously from 427 to 269 positions.<sup>5</sup> With only one of these positions specifically dedicated to organic production, less than 0.5% of total UC resources go to organic specialists<sup>6</sup> in a state where organic makes up 20% of the total value of agriculture<sup>7</sup> and accounts for 40% of organic production value nationally.<sup>8</sup>

At the same time, CDFA's Technical Assistance Grants Program focuses on improving accessibility of climate smart agriculture funds. However, because these programs do not incentivize organic transition, providers are not equipped to holistically address the needs of organic producers. CCOF and ALBA recommend creating a research, education, and technical assistance grant program under the organic transition program to assess the needs of transitioning producers, provide organic-specific technical assistance, and conduct on-farm organic research.

#### **Regional Food System Grants**

A critical component driving the success of transitioning farmers and ranchers is whether there is a market waiting for their organic product. An organic transition program cannot only examine the supply side of the equation but must also consider demand. To address this challenge, CCOF and ALBA recommend an organic transition program include grants to establish and expand local or regional-scale processing, aggregation, distribution, and other supply chain infrastructure to help connect transitioning farmers with viable markets in addition to establishing channels through which organic farmers and ranchers may offer their products for state procurement.

In conclusion, CDFA has the opportunity to invest in farmers and ranchers, to provide flexibility as the agriculture sector faces increased pressure from wildfire, drought, and regulations. Governor Newsom's Executive Order N-82-30 enlists California's natural and working lands to combat climate change and help the State achieve carbon neutrality. An organic transition program is one more tool in the climate smart agriculture toolbox that will uplift the important work of California's farmers and ranchers to reach these goals. Thank you for considering our comment.

Sincerely,

Rebekah Weber Policy Director

**CCOF** 

Nathan Harkleroad Program Director ALBA

<sup>&</sup>lt;sup>3</sup> National Agricultural Statistics Service. (2020). *2019 Organic Survey,* 2017 Census of Agriculture (Volume 3, Special Studies, Part 4). Washington, D.C.: U.S. Department of Agriculture.

<sup>&</sup>lt;sup>4</sup> Greg Perry, Agricultural and Resource Economics, Colorado State University, Briefing provided to Western Association of Agricultural Experiment Station Directors, March 31, 2021. Data from USDA National Institute of Food and Agriculture based on 2018 allocations and farm gate receipts.

<sup>&</sup>lt;sup>5</sup> Humiston, G. 2021. UC ANR Budget and Staffing Analysis to Meet the Needs of All Californians. Response to Senate request posted at <a href="https://ucanr.edu/sites/Professional\_Development/Building\_Support/Advocacy/">https://ucanr.edu/sites/Professional\_Development/Building\_Support/Advocacy/</a>. An educated guess on the number of UCCE positions that will be created through 2021 budget restoration is approximately 60. H. Wilson, pers. comm. Oct. 12, 2021.

<sup>&</sup>lt;sup>6</sup> McNulty, J. 2019. UC Cooperative Extension hires first organic specialist. UC Santa Cruz NewsCenter. May 13, 2019. Calculation based on data in UC ANR Budget and Staffing Analysis: 1/269 total positions = 0.37%.

<sup>&</sup>lt;sup>7</sup> Based on calculations using data reported in California Department of Food and Agriculture. 2021. *California Agricultural Statistics Review 2019-2020.* 

<sup>&</sup>lt;sup>8</sup> California Department of Food and Agriculture. 2021. *California Agricultural Organic Report: 2019-2020.* Page 3 of 3

STATE CAPITOL P.O. BOX 942849 SACRAMENTO, CA 94249-0013 (916) 319-2013 FAX (916) 319-2113

**E-MAIL**Assemblymember.Villapudua@assembly.ca.gov



DISTRICT OFFICE
31 EAST CHANNEL STREET, SUITE 306
STOCKTON, CA 95202
(209) 948-7479
FAX (209) 465-5058

October 19, 2021

Secretary Karen Ross California Department of Food and Agriculture 1220 N Street Sacrament, CA 95814

#### Comments on the 2021 Conservation Agriculture Planning Grants Program Request for Proposals

Dear Secretary Ross,

The California Department of Food and Agriculture (CDFA) has made tremendous strides in providing assistance programs and the needed resources to help our agriculture community adapt to our changing climate. Over this same time, the Legislature and governing bodies have been working on solutions that ask for more sustainable practices for the long-term benefit of the state's ecosystem. One of these solutions was to implement the Sustainable Groundwater Management Act (SGMA) to scale back the use of our groundwater and restore the health of California's basins.

While SGMA is an important tool to keep our water supply in balance, it does not come without short-term stresses on our farmers and ranchers who depend so heavily on this water use. That is why I introduced <u>Assembly Bill 350</u> earlier this year, intending to provide support and guidance for those who may be most impacted by the implementation of SGMA. <u>The Public Policy Institute of California</u> estimates that 500,000 acres in the San Joaquin Valley alone will need to be repurposed. Other sources estimate this number to be closer to 1 million acres. The challenge ahead for our agriculture community is immense, but not insurmountable.

AB 350 recognized this challenge and works to provide farmers and ranchers in high and medium priority groundwater basins with advisors to create individual management plans that assess different conservation methods and evaluate feasible alternative uses of their lands moving forward. With the CDFA's implementation of the Conservation Agriculture Planning Grants Program, we have the opportunity to provide this needed resource in an all-encompassing program that shares the goal of providing assistance to reach sustainable climate practices.

STATE CAPITOL P.O. BOX 942849 SACRAMENTO, CA 94249-0013 (916) 319-2013 FAX (916) 319-2113

**E-MAIL**Assemblymember.Villapudua@assembly.ca.gov



DISTRICT OFFICE
31 EAST CHANNEL STREET, SUITE 306
STOCKTON, CA 95202
(209) 948-7479
FAX (209) 465-5058

This is why I ask that we consider the following priorities to be integrated into the program:

- 1. Create explicit language in the <u>Background</u> section of the document to include water availability as a climate change impact.
- 2. Under the <u>Eligibility</u> section, CDFA should also include Groundwater Sustainability Agencies, and local agencies.
- 3. Under <u>Program Requirements</u>, CDFA should include prioritization for applicants proposing projects that will address water use, and address helping farmers who are at risk of fallowing due to water shortages to avoid permanent fallowing where possible in groundwater basins designated as high and medium priority basins by the Department of Water Resources.
- 4. Also under <u>Program Requirements</u>, CDFA should require one groundwater related grant award in each high priority basin (as defined by the Department of Water Resources), and prioritize grant proposals in medium priority basins (as defined by the Department of Water Resources) to ensure broad geographic and regional implementation.

With these priorities, I believe we can further the program's conservation goals and reach while working toward a successful implementation of SGMA that does not affect the long-term prosperity of California's farmers and ranchers.

Thank you for your consideration of these recommendations.

Carlos Villapudua,

Assemblymember, 13th District



Office of Environmental Farming and Innovation California Department of Food and Agriculture 1220 N Street Sacramento, CA 95814

RE: NRDC comment letter on CDFA's Draft Request for Proposals for the Conservation Agriculture Planning Grant Program

Dear Office of Environmental Farming Initiative,

On behalf of Natural Resources Defense Council (NRDC) and NRDC Action Fund, we are writing to provide comments on the Department of Food and Agriculture's (CDFA) 2021 <u>Conservation Agriculture Planning Grant Program Draft Request for Proposals</u>. Administered by the Department of Food and Agriculture (CDFA), this program provides funding for technical assistance providers (TAP) to develop various agricultural conservation plans related to the CDFA's Climate Smart Agriculture (CSA) programs. With the growing threats imposed by climate change, it is vitally important for CDFA to maximize the climate benefits and purpose of its new Conservation Agriculture Planning Grant Program (CAPGP) and encourage water efficiency and conservation, riparian restoration, and holistic farm and ranch management.

### Explain how CDFA determined which plans would get funded through CAPGP and justify determinations in a climate context.

The CAPGP was created through the <u>Budget Act of 2021</u>, but the Draft Request for Proposals (RFP) does not make it clear exactly how CDFA determined which plans would be eligible for funding through the program. In their first presentation to the Science Advisory Panel on April 2021, agency staff stated the "program will fund the development of various types of agricultural conservation activity plans related to the department's Climate Smart Agriculture programs." However, to date, CDFA has not provided an explanation of how the department selected the 12 plans currently listed in the RFP. Since the intent of CAPGP is to encourage conservation activities related to CDFA's CSA programs, CDFA must describe how they determined the list of 12 plans, justify their decisions in a climate context, and require TAPs to articulate the nexus between their plan development and climate change mitigation in their proposals.

#### Include water efficiency and water conservation as a climate adaptation strategy in the background.

Climate change will reduce future water availability for agriculture.<sup>2</sup> Thankfully, agricultural practices that build soil health and soil biology can help farmers and ranchers retain more water in fields when it rains, reduce reliance on surface water deliveries, and provide resilience in the face of drought.<sup>3</sup> For example, cover cropping builds soil organic matter while maintaining soil structure so that water is better retained when it falls on fields.<sup>4</sup> If half of California's croplands were planted with cover crops, California farms could increase soil's water storage potential

<sup>&</sup>lt;sup>1</sup> PUBLIC MEETING OF THE CDFA ENVIRONMENTAL FARMING ACT SCIENCE ADVISORY PANEL. April 29, 2021. https://www.cdfa.ca.gov/oefi/efasap/docs/20210429\_Binder\_EFA\_SAP.pdf

<sup>&</sup>lt;sup>2</sup> Gowda, P., J.L. Steiner, C. Olson, M. Boggess, T. Farrigan, and M.A. Grusak, 2018: Agriculture and Rural Communities. In *Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II* [Reidmiller, D.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, K.L.M. Lewis, T.K. Maycock, and B.C. Stewart (eds.)]. U.S. Global Change Research Program, Washington, DC, USA, pp. 391–437. doi: 10.7930/NCA4.2018.CH10

<sup>3</sup> Sharma, Arohi. *Building Roots for A More Water Secure California*. December 2018. https://www.nrdc.org/experts/arohi-sharma/building-roots-more-water-course california.

<sup>&</sup>lt;sup>4</sup> California Department of Food and Agriculture. Cover crops and water infiltration--a video from the USDA's Natural Resources Conservation Service. July 2014. http://plantingseedsblog.cdfa.ca.gov/wordpress/?p=6587

by 10.9 billion gallons and sequester 540,000 metric tons of greenhouse gasses. Unfortunately, the importance of water conservation and agricultural water use efficiency is left out of the background of CAPGP. CDFA should draft explicit language in the BACKGROUND section of the RFP that says plans funded through CAPGP must help promote CSA efforts that help increase agricultural water use efficiency and help reduce agriculture's reliance on the kind of surface water that will be even more scarce in the future.

#### Include funding for conservation plans that increase riparian buffer reforestation and riparian herbaceous cover.

Restoring riparian ecosystems including riparian forests, woodlands, and herbaceous covers is a critical, yet underutilized climate mitigation tool in California. In addition to addressing the state's biodiversity crisis, riparian ecosystems provide enormous co-benefits in the form of carbon sequestration, improved water quality, better habitat and migratory corridors for fish and wildlife, replenished groundwater aquifers, and improved flood protection for downstream communities. 10 Unfortunately, recent studies estimate the state has lost around 95 percent of the Central Valley's riparian woodlands, along with the conditions they evolved in. 11 Remaining riparian forests face multiple threats both from development and mismanagement as well as increasing droughts and floods intensified by climate change.

Restoring degraded riparian forests provides a highly effective tool to maximize both climate and biodiversity benefits. <sup>12</sup> as envisioned by Governor Newsom's Executive Order and the California Natural Resources Agency's recently published Draft Natural and Working Lands Climate Smart Lands Strategy. Furthermore, riparian forest buffers (USDA NRCS CPS 391) and riparian herbaceous cover (USDA NRCS CPS 390) are included as eligible practices for funding through the Healthy Soils Program, indicating CDFA's agreement that riparian restoration has climate benefits on agricultural lands. CDFA should make funding available for conservation agriculture plans that specifically increase and restore riparian areas on agricultural lands.

#### Prioritize funding for TAPs who develop comprehensive farm plans for growers in areas that maximize soil carbon sequestration, biodiversity protections, and water conservation.

Transforming agriculture into a climate solution requires a multifaceted approach to land and soil management. Soil health, water conservation and efficiency, soil biology, carbon sequestration, greenhouse gas mitigation, and biological pest management are interrelated and need to be addressed as such. The recently published *Draft Natural* and Working Lands Climate Smart Lands Strategy also recommends the state "promote comprehensive farm management plans."

We appreciate CDFA prioritizing CAPGP funds for TAPs who partner with socially disadvantaged farmers and ranchers and farms less than 500 acres. We urge CDFA to also add prioritization for TAPs who develop multiple conservation agriculture plans for farmers and ranchers who grow in areas that can maximize soil carbon sequestration, biodiversity protections, and water conservation. CDFA has done similar prioritization in other programs it manages. For example, in a recent update to the State Water Efficiency and Energy Program, CDFA added prioritization for projects that also include other soil management activities. <sup>13</sup> To maximize the climate

<sup>&</sup>lt;sup>5</sup> NRDC, Climate Ready Soil: How Cover Crops Can Make Farms More Resilient to Extreme Weather Risks, California. November 2015. https://www.nrdc.org/sites/default/files/climate-ready-soil-CA-IB.pdf

<sup>&</sup>lt;sup>6</sup> Dybala KE, Matzek V, Gardali T, Seavy NE. (2018) Carbon sequestration in riparian forests: a global synthesis and meta-analysis. Global Change Biology. https://doi.org/10.1111/gcb.14475

<sup>&</sup>lt;sup>7</sup> Hughes RM, Vadas RL Jr. Agricultural Effects on Streams and Rivers: A Western USA Focus. Water. 2021; 13(14):1901. https://doi.org/10.3390/w13141901

Eloern JE, Safran SM, et al., On the human appropriation of wetland primary production, Science of The Total Environment, Vol. 785, 2021, 147097, ISSN 0048-9697. https://doi.org/10.1016/j.scitotenv.2021.147097

<sup>9</sup> Mass. DFG, Functions of Riparian Areas for Groundwater Protection, 2014. https://www.mass.gov/doc/fact-sheet-6-functions-of-riparian-areas-forgroundwater-protection/download#:~:text=Keeping%20riparian%20areas%20naturally%20vegetated,water%20supplies%20and%20private%20wells

Assoc. of State Floodplain Managers, Natural and Beneficial Floodplain Functions: Floodplain Management - More than Flood Loss Reduction, Sept. 2008. https://s3-us-west-2.amazonaws.com/asfpm-library/FSC/General/ASFPM Natural Floodplain Functions 2008.pdf; FEMA, The natural and beneficial functions of floodplains: reducing flood losses by protecting and restoring the floodplain environment: a report for Congress, 2002. https://babel.hathitrust.org/cgi/pt?id=uiug.30112059865722&view=1up&seq=3

11 Gross, Liza. "Forests of the Living Dead." Inside Climate News, July 6, 2021. https://insideclimatenews.org/news/06072021/forests-of-the-living-dead/

<sup>12</sup> Dybala, KE, Steger, K, Walsh, RG, Smart, DR, Gardali, T, Seavy, NE. Optimizing carbon storage and biodiversity co-benefits in reforested riparian zones. J Appl Ecol. 2019; 56: 343–353. https://doi.org/10.1111/1365-2664.13272

<sup>&</sup>lt;sup>13</sup> PUBLIC MEETING OF THE CDFA ENVIRONMENTAL FARMING ACT SCIENCE ADVISORY PANEL. October 14, 2021. https://www.cdfa.ca.gov/oefi/efasap/docs/20211014 efa sap binder.pdf

benefits and impacts of CAPGP funds, CDFA should work with other natural resource departments to determine areas of high priority for soil carbon sequestration, biodiversity protection, and water conservation and prioritize awarding funds for TAPs who develop plans for farmers and ranchers in those high priority areas.

#### Add State Conservancies to the list of eligible entities in CAPGP.

The State of California has a unique set of tools at its disposal—its diverse and powerful state conservancies. From the Coastal Conservancy to the Sierra Nevada and Coachella Valley Mountains Conservancies, these entities are powerful agents for conservation and often work with farmers, ranchers, and other landowners to promote climate smart agricultural practices. CDFA should list State Conservancies as eligible recipients of CAPGP funding and work with them to advance conservation and restoration opportunities that prioritize equity in communities that historically have been, and often still are, excluded from conservation efforts.

#### Create a separate organic transition program instead of including organic assistance through CAPGP.

While NRDC supports the inclusion of an organic system plan in the CAPGP, this planning program cannot substitute for a comprehensive organic transition program. The purpose of CAPGP is to fund the development (but not the implementation) of conservation plans, not to provide the suite of tools and resources farmers and ranchers need to transition to organic production. An organic system plan is necessary to become certified organic; however, it is not sufficient to aid farmers and ranchers through this challenging process. The State included \$7 million in the FY21-22 California state budget for organic transition. Rather than funneling these funds through CAPGP, NRDC urges CDFA to create an organic transition program and provide farmers and ranchers with an additional tool in the climate smart agriculture toolbox.

## Provide clarity that CAPGP funds will be administered through a competitive grant process instead of a first-come, first-served process.

CDFA has already heard concerns from several stakeholders regarding the problems of a first-come, first-served application process. A first-come, first-served application review process skews applications toward established agricultural industry trade groups who already operate in their own community of growers and can discourage TAPs from attempting to build new relationships with farmers and ranchers due to concerns about funding running out from a first-come, first-served review process. In their October 14, 2021 Meeting Agenda, CDFA staff noted their intent to change the first-come, first-served application review to a competitive grant period. However, the "first-come, first-served" language is still included in the technical review section (page 6) of the current draft RFP. Before the RFP is finalized, CDFA should ensure the CAPGP application is reviewed and administered through a competitive grant process.

Thank you for this opportunity to provide feedback on the draft RFP for the Conservation Agriculture Planning Grant Program. In recognition of CDFA's goal to maximize the climate mitigation impact of its Climate Smart Agriculture programs, we urge you to consider our recommendations for how to improve the grant program. We look forward to continuing our work with you.

Sincerely,

Arohi Sharma Water Policy Analyst Nature Program

<sup>&</sup>lt;sup>14</sup> California Dept. of Food and Agriculture Office of Environmental Farming & Innovation. <u>Conservation Agriculture Planning Grant Program: Draft Request for Proposals</u>. pg. 2.





Submitted via cdfa.oefi@cdfa.ca.gov

Secretary Karen Ross California Department of Food and Agriculture 1220 N Street Sacramento, CA 95814

Re: 2021 Conservation Agriculture Planning Grants Program RFP

Dear Secretary Ross,

The Association of California Water Agencies (ACWA) appreciates the opportunity to provide public comments to the California Department of Food and Agriculture (CDFA) on the Draft Request for Proposals (RFP) for the Conservation Agriculture Planning Grants Program (CAPGP). ACWA represents more than 460 public water agencies that collectively deliver approximately 90 percent of the water used in California for domestic, agricultural, and industrial uses. ACWA appreciates that the funding that will be available through the CAPGP will be used to promote environmental and agricultural sustainability. ACWA's members work closely with water users throughout the state to prepare for and respond to the climate change impacts and use water resources wisely.

### Comment 1: Include Groundwater Sustainability Agencies (GSAs) and local agencies as eligible entities.

ACWA suggests CDFA staff includes GSAs and local agencies as eligible entities to receive CAPGP funding. GSAs and local agencies are well equip to collaborate with farmers and ranchers that need assistance with conservation agriculture planning activities.

#### Comment 2: Prioritize projects that will address water shortage.

ACWA recommends that CDFA staff prioritizes projects that will address water shortage and help farmers who are at risk of fallowing due to water shortages to avoid permanent fallowing where possible in groundwater basins designated as high- or medium-priority basins by the Department of Water Resources (DWR). The Sustainable Groundwater Management Act (SGMA) is projected to lead to the fallowing of some groundwater-dependent California farmland. The Public Policy Institute of California estimates that hundreds of thousands of acres of farmland will come out of production as SGMA is implemented. Ensuring that local communities have the necessary resources to adapt to this new framework is critical to SGMA's success. Prioritizing projects that will address water shortage in the CAPGP would increase the program's goals and reach, especially while the state is working to implement SGMA for water resiliency.

#### Comment 3: List water availability as a climate change impact in the Background.

CDFA staff highlights the risks that climate change poses to agriculture on Page 2 of the RFP. ACWA suggests that water availability is explicitly listed as a climate change impact in the Background section of the RFP for the CAPGP. Climate change will likely result in warmer temperatures, less snowpack, and more frequent and prolonged droughts.

ACWA appreciates CDFA's consideration of these comments. Please do not hesitate to contact me at <a href="ivyb@acwa.com">ivyb@acwa.com</a> or (916) 441-4545 if you have any questions regarding ACWA's input.

Sincerely,

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Ily Brittain

Senior Regulatory Advocate

cc: Dave Eggerton, Executive Director, Association of California Water Agencies Cindy Tuck, Deputy Executive Director, Association of California Water Agencies



Office of Environmental Farming and Innovation California Department of Food and Agriculture 1220 N Street Sacramento, CA 95814

RE: CAC Comment Letter on CDFA's Proposed Conservation Agriculture Planning Grant Program

Submitted via email at cdfa.oefi@cdfa.ca.gov

Dear Office of Environmental Farming and Innovation:

The California Apple Commission (CAC) appreciates the opportunity to comment on California Department of Food and Agriculture's (CDFA) Draft Request for Proposals for the 2021 Conservation Agriculture Planning Grant Program (CAPGP).

The CAC is a state Commission that represents over 70 million pounds of fresh apples. The Commission aims to do what the individual grower cannot do through conducting various research, education and advocacy programs.

We appreciate CDFA's commitment to providing farmers and ranchers a range of tools to combat climate change. The new CAPGP is one of these tools. We commend CDFA for improving the program by adding state-certified crop, pest control, and rangeland advisors as qualified applicants and enabling farmers and ranchers to apply directly for funds to develop an organic system plan. We ask CDFA to clarify that a standalone organic system plan is eligible for funding. Creating an organic system plan is the first step in transitioning to organic production.

While the CAC supports the inclusion of an organic system plan in the CAPGP, this planning program cannot substitute for a comprehensive organic transition program. The purpose of CAPGP is to fund the development of conservation plans. not implementation and not to provide the suite of tools and resources farmers and ranchers need to transition to organic production. An organic system plan is necessary to become certified organic; however, it is not sufficient to aid farmers and ranchers through this challenging process. The State included \$7 million in the FY21-22 California state budget for organic transition. The intention is to support organic transition and CDFA is not required to limit these funds to organic system planning. The CAC urges CDFA to create an organic transition program and provide farmers and ranchers with an additional tool in the climate smart agriculture toolbox.

A successful organic transition program includes:

- Transition grants that directly support farmers and ranchers in implementing practices that build soils and biologically manage pests while offsetting the economic risk of transitioning to organic production
- Investment in mentorship of transitioning farmers and ranchers by veteran organic producers
- Research, education, and technical assistance grants that build capacity of technical assistance providers to support transitioning farmers and ranchers with resources that are culturally and linguistically appropriate
- Regional food system grants that expand local markets for organically produced food, creating more opportunities for new and existing organic farmers and ranchers

CDFA has the opportunity to invest in farmers and ranchers, to provide flexibility as the agriculture sector faces increased pressure from wildfire, drought, and regulations. Governor Newsom's Executive Order N-82-30 enlists California's natural and working lands to combat climate change and help the State achieve carbon neutrality. An organic transition program is one more tool in the climate smart agriculture toolbox that will uplift the important work of California's farmers and ranchers.

Thank you for considering our comment.

Sincerely,

Todd Sanders Executive Director

California Apple Commission



Office of Environmental Farming and Innovation California Department of Food and Agriculture 1220 N Street Sacramento, CA 95814

RE: CBC Comment Letter on CDFA's Proposed Conservation Agriculture Planning Grant Program

Submitted via email at <a href="mailto:cdfa.oefi@cdfa.ca.gov">cdfa.oefi@cdfa.ca.gov</a>

Dear Office of Environmental Farming and Innovation:

The California Blueberry Commission (CBC) appreciates the opportunity to comment on California Department of Food and Agriculture's (CDFA) Draft Request for Proposals for the 2021 Conservation Agriculture Planning Grant Program (CAPGP).

The CBC is a state Commission that represents California blueberry growers, shippers, and packers. The Commission aims to do what the individual grower cannot do through conducting various research, education and advocacy programs.

We appreciate CDFA's commitment to providing farmers and ranchers a range of tools to combat climate change. The new CAPGP is one of these tools. We commend CDFA for improving the program by adding state-certified crop, pest control, and rangeland advisors as qualified applicants and enabling farmers and ranchers to apply directly for funds to develop an organic system plan. We ask CDFA to clarify that a standalone organic system plan is eligible for funding. Creating an organic system plan is the first step in transitioning to organic production.

While the CBC supports the inclusion of an organic system plan in the CAPGP, this planning program cannot substitute for a comprehensive organic transition program. The purpose of CAPGP is to fund the development of conservation plans, not implementation and not to provide the suite of tools and resources farmers and ranchers need to transition to organic production. An organic system plan is necessary to become certified organic; however, it is not sufficient to aid farmers and ranchers through this challenging process. The State included \$7 million in the FY21-22 California state budget for organic transition. The intention is to support organic transition and CDFA is not required to limit these funds to organic system planning. The CBC urges CDFA to create an organic transition program and provide farmers and ranchers with an additional tool in the climate smart agriculture toolbox.

A successful organic transition program includes:

- Transition grants that directly support farmers and ranchers in implementing practices that build soils
  and biologically manage pests while offsetting the economic risk of transitioning to organic
  production
- Investment in mentorship of transitioning farmers and ranchers by veteran organic producers
- Research, education, and technical assistance grants that build capacity of technical assistance
  providers to support transitioning farmers and ranchers with resources that are culturally and
  linguistically appropriate



• Regional food system grants that expand local markets for organically produced food, creating more opportunities for new and existing organic farmers and ranchers

CDFA has the opportunity to invest in farmers and ranchers, to provide flexibility as the agriculture sector faces increased pressure from wildfire, drought, and regulations. Governor Newsom's Executive Order N-82-30 enlists California's natural and working lands to combat climate change and help the State achieve carbon neutrality. An organic transition program is one more tool in the climate smart agriculture toolbox that will uplift the important work of California's farmers and ranchers.

Thank you for considering our comment.

Sincerely,

Todd Sanders Executive Director

California Blueberry Commission



Office of Environmental Farming and Innovation California Department of Food and Agriculture 1220 N Street Sacramento, CA 95814

RE: CWRAB Comment Letter on CDFA's Proposed Conservation Agriculture Planning Grant Program

Submitted via email at <a href="mailto:cdfa.oefi@cdfa.ca.gov">cdfa.oefi@cdfa.ca.gov</a>

Dear Office of Environmental Farming and Innovation:

The California Wild Rice Advisory Board (CWRAB) appreciates the opportunity to comment on California Department of Food and Agriculture's (CDFA) Draft Request for Proposals for the 2021 Conservation Agriculture Planning Grant Program (CAPGP).

The CWRAB is a state Advisory Board that represents California wild rice growers. The Advisory Board aims to do what the individual grower cannot do through conducting various research, education and advocacy programs.

We appreciate CDFA's commitment to providing farmers and ranchers a range of tools to combat climate change. The new CAPGP is one of these tools. We commend CDFA for improving the program by adding state-certified crop, pest control, and rangeland advisors as qualified applicants and enabling farmers and ranchers to apply directly for funds to develop an organic system plan. We ask CDFA to clarify that a standalone organic system plan is eligible for funding. Creating an organic system plan is the first step in transitioning to organic production.

While the CWRAB supports the inclusion of an organic system plan in the CAPGP, this planning program cannot substitute for a comprehensive organic transition program. The purpose of CAPGP is to fund the development of conservation plans, not implementation and not to provide the suite of tools and resources farmers and ranchers need to transition to organic production. An organic system plan is necessary to become certified organic; however, it is not sufficient to aid farmers and ranchers through this challenging process. The State included \$7 million in the FY21-22 California state budget for organic transition. The intention is to support organic transition and CDFA is not required to limit these funds to organic system planning. The CWRAB urges CDFA to create an organic transition program and provide farmers and ranchers with an additional tool in the climate smart agriculture toolbox.

A successful organic transition program includes:

• Transition grants that directly support farmers and ranchers in implementing practices that build



soils and biologically manage pests while offsetting the economic risk of transitioning to organic production

- Investment in mentorship of transitioning farmers and ranchers by veteran organic producers
- Research, education, and technical assistance grants that build capacity of technical assistance
  providers to support transitioning farmers and ranchers with resources that are culturally and
  linguistically appropriate
- Regional food system grants that expand local markets for organically produced food, creating more opportunities for new and existing organic farmers and ranchers

CDFA has the opportunity to invest in farmers and ranchers, to provide flexibility as the agriculture sector faces increased pressure from wildfire, drought, and regulations. Governor Newsom's Executive Order N-82-30 enlists California's natural and working lands to combat climate change and help the State achieve carbon neutrality. An organic transition program is one more tool in the climate smart agriculture toolbox that will uplift the important work of California's farmers and ranchers.

Thank you for considering our comment.

Sincerely,

Todd Sanders
Executive Director

California Wild Rice Advisory Board



Office of Environmental Farming and Innovation California Department of Food and Agriculture 1220 N Street Sacramento, CA 95814

RE: OGCC Comment Letter on CDFA's Proposed Conservation Agriculture Planning Grant Program

Submitted via email at cdfa.oefi@cdfa.ca.gov

Dear Office of Environmental Farming and Innovation:

The Olive Growers Council of California (OGCC) appreciates the opportunity to comment on California Department of Food and Agriculture's (CDFA) Draft Request for Proposals for the 2021 Conservation Agriculture Planning Grant Program (CAPGP).

The OGCC is a voluntary organization that represents the majority of California ripe table olive growers.

We appreciate CDFA's commitment to providing farmers and ranchers a range of tools to combat climate change. The new CAPGP is one of these tools. We commend CDFA for improving the program by adding state-certified crop, pest control, and rangeland advisors as qualified applicants and enabling farmers and ranchers to apply directly for funds to develop an organic system plan. We ask CDFA to clarify that a standalone organic system plan is eligible for funding. Creating an organic system plan is the first step in transitioning to organic production.

While the OGCC supports the inclusion of an organic system plan in the CAPGP, this planning program cannot substitute for a comprehensive organic transition program. The purpose of CAPGP is to fund the development of conservation plans, not implementation and not to provide the suite of tools and resources farmers and ranchers need to transition to organic production. An organic system plan is necessary to become certified organic; however, it is not sufficient to aid farmers and ranchers through this challenging process. The State included \$7 million in the FY21-22 California state budget for organic transition. The intention is to support organic transition and CDFA is not required to limit these funds to organic system planning. The OGCC urges CDFA to create an organic transition program and provide farmers and ranchers with an additional tool in the climate smart agriculture toolbox.

A successful organic transition program includes:

- Transition grants that directly support farmers and ranchers in implementing practices that build soils and biologically manage pests while offsetting the economic risk of transitioning to organic production
- Investment in mentorship of transitioning farmers and ranchers by veteran organic producers
- Research, education, and technical assistance grants that build capacity of technical assistance providers to support transitioning farmers and ranchers with resources that are culturally and linguistically appropriate
- Regional food system grants that expand local markets for organically produced food, creating more opportunities for new and existing organic farmers and ranchers



CDFA has the opportunity to invest in farmers and ranchers, to provide flexibility as the agriculture sector faces increased pressure from wildfire, drought, and regulations. Governor Newsom's Executive Order N-82-30 enlists California's natural and working lands to combat climate change and help the State achieve carbon neutrality. An organic transition program is one more tool in the climate smart agriculture toolbox that will uplift the important work of California's farmers and ranchers.

Thank you for considering our comment.

Sincerely,

Todd Sanders Executive Director

Olive Growers Council of California





Office of Environmental Farming and Innovation California Department of Food and Agriculture 1220 N Street
Sacramento, CA 95814
Submitted to cdfa.oefi@cdfa.ca.gov

## **RE: CDFA's draft Conservation Agriculture Planning Grant Program Request for Proposals**

Dear Office of Environmental Farming and Innovation:

On behalf of Pesticide Action Network and Californians for Pesticide Reform, we thank you for the opportunity to comment on CDFA's Conservation Agriculture Planning Grant Program Draft Request for Proposals.

We are encouraged to see that OEFI staff acknowledge that Integrated Pest Management (IPM) and organic practices are essential to addressing emissions from California agricultural systems by including Integrated Pest Management (IPM) Plan (USDA NRCS CAP 114), IPM Herbicide Resistance Weed Conservation Plan (USDA NRCS CAP 154), and Conservation Plan Supporting Organic Transition (USDA NRCS CAP 138) in the list of eligible practices in the RFP. However, we are concerned that OEFI is incentivizing **plans** to transition farmers towards organic farming and away from pesticides, rather than **concrete action and implementation**.

While we support the continued inclusion of these plans in the draft CAPGP RFP, we strongly urge OEFI staff to also include IPM strategies in the Healthy Soils Program with pesticide reduction targets during the project period. We also encourage the establishment of a separate organic transition program that is not a part of the CAPGP, and more investments in technical assistance that focus on IPM and organic agriculture.

#### **Moving Beyond Plans to Action**

While we are encouraged to see IPM strategies recognized as a climate change solution, neither of the IPM plans included in the draft CAPCP RFP would necessarily result in decreased pesticide use. The plans allow for practices that would simply alternate the types of herbicides used, or mitigate the impacts of pesticides, without addressing the overuse of pesticides in California that harms human and soil health. Pesticides are applied on cropland in California at a rate 4.5 times higher than the national average. Therefore, while plans can be an important first step, CDFA must implement programs that result in actual pesticide use reduction.

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<sup>&</sup>lt;sup>1</sup> Ferguson, Rafter, Kristina Dahl, and Marcia DeLonge. 2019. Farmworkers at Risk: The Growing Dangers of Pesticides and Heat. Cambridge, MA: Union of Concerned Scientists. https://www.ucsusa.org/resources/farmworkers-at-risk

For this reason, we urge OEFI staff to add IPM strategies to the Healthy Soils Program, which is more focused on implementation of practices rather than plans, alongside a requirement to significantly reduce pesticide use during the project period.

#### The Lack of Organic and IPM Technical Assistance

California agriculture faces a crisis in the lack of technical assistance available in general, and specifically for farmers interested in transitioning to organic and integrated pest management practices:

- When measured per economic unit of agricultural production, California sits 38th nationally in public funding for agricultural research and Cooperative Extension<sup>2</sup>
- Over the past two decades the number of UC specialists and farm advisors has decreased by one-third.<sup>3</sup>
- UC IPM extension farm advisor staff has decreased by more than a third since 2015, from 11 to seven advisors, making up only 2.6% of total UC cooperative extension staff.<sup>4</sup> UC ANR has requested an additional 15 IPM advisors and specialists -- the second highest requested for a UC ANR program.<sup>5</sup>
- Only one position focuses on organic production, meaning less than 0.5% of total UC resources go to organic specialists<sup>6</sup> in a state where organic makes up 20% of the total value of agriculture<sup>7</sup> and accounts for 40% of organic production value nationally.<sup>8</sup>

Conservation plans and transitions to conservation practices will be limited without sufficient IPM and organic technical support. We urge staff to consider creating a research, education, and technical assistance grant program to assess the needs of producers, and provide technical assistance and research for producers transitioning to organic and IPM practices that reduce pesticide use.

#### **Standalone Organic Transition Program**

We encourage the establishment of an organic transition program separate from the planning program that is more comprehensive in scope, in order to provide producers the technical and

<sup>&</sup>lt;sup>2</sup> Greg Perry, Agricultural and Resource Economics, Colorado State University, Briefing provided to Western Association of Agricultural Experiment Station Directors, March 31, 2021. Data from USDA National Institute of Food and Agriculture based on 2018 allocations and farm gate receipts.

<sup>&</sup>lt;sup>3</sup> Humiston, G. 2021. UC ANR Budget and Staffing Analysis to Meet the Needs of All Californians. https://ucanr.edu/sites/Professional\_Development/Building\_Support/Advocacy/.

<sup>&</sup>lt;sup>4</sup> Humiston, G. 2021. UC ANR Budget and Staffing Analysis to Meet the Needs of All Californians. https://ucanr.edu/sites/Professional\_Development/Building\_Support/Advocacy/.

<sup>&</sup>lt;sup>5</sup> Humiston, G. 2021. UC ANR Budget and Staffing Analysis to Meet the Needs of All Californians. https://ucanr.edu/sites/Professional\_Development/Building\_Support/Advocacy/.

<sup>&</sup>lt;sup>6</sup> McNulty, J. 2019. UC Cooperative Extension hires first organic specialist. UC Santa Cruz NewsCenter. May 13, 2019. Calculation based on data in UC ANR Budget and Staffing Analysis: 1/269 total positions = 0.37%.

<sup>&</sup>lt;sup>7</sup> Based on calculations using data reported in California Department of Food and Agriculture. 2021. California Agricultural Statistics Review 2019-2020.

<sup>&</sup>lt;sup>8</sup> California Department of Food and Agriculture. 2021. California Agricultural Organic Report: 2019-2020.

financial support they need to transition cost-effectively. A successful transition program should include the following:

- Grants that directly support farmers and ranchers transitioning to organic practices or other practices that reduce pesticide use, prioritizing socially disadvantaged farmers and small farmers.
- Investment in mentorship by established organic producers and increased research and technical assistance for organic farming given there is currently only one UC farm advisor specializing in organic in the state.
- Regional food system grants for organic farmers to expand their marketing to local markets.

In conclusion, incentivizing organic transition plans only scratches the surface of the support producers need to transition to organic practices. Far more comprehensive support is needed.

Thank you again for the opportunity to comment and for considering our feedback. We would be happy to meet with agency staff regarding any of our recommendations.

Sincerely,

Asha Sharma

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California Organizing Director, Pesticide Action Network

Margaret Reeves

Jane Seller

Sal C. a.2

Magaret Rows

Senior Scientist, Pesticide Action Network

Jane Sellen

Co-Director, Californians for Pesticide Reform

Sarah Aird

Co-Director, Californians for Pesticide Reform

Pesticide Action Network North America is one of five regional centers worldwide representing hundreds of organizations in more than 90 countries. We work to promote the transition to a more just and sustainable food and agriculture system that is free from hazardous pesticides. We represent more than 5,000 California members.

Californians for Pesticide Reform is a statewide coalition of 200+ organizations working together to protect public health, improve environmental quality and support a sustainable and just agricultural system by building a diverse movement across California to change statewide and local pesticide policies and practices.



Environmental Farming Act Science Advisory Panel California Department of Food and Agriculture 1120 N Street Sacramento, CA 95814

Re: 2021 Conservation Agriculture Planning Grants Program Draft Request for Proposals

To whom it may concern:

Thank you for the opportunity to share our comments on the 2021 Conservation Agriculture Planning Grants Program Draft Request for Proposals. We appreciate you reviewing our comments in the last round and adopting some of the suggestions.

As you know, the 95 RCDs in the State are a critical part of the technical assistance network that provides planning to farmers and ranchers. RCDs are a large part of CDFA's grant programs and have received many of the technical assistance and farm demonstration grants in the Healthy Soils program. RCDs will likely receive many grants in this program.

As you also know, farm planning is essential to good conservation on farms and an important part of farmers being part of the solution to climate and other environmental challenges. We are very excited to see a proposed funding program to develop a suite of conservation plans for agricultural operators. We feel this is critical to the success of conservation on farmland and we applied the department for taking this critical step.

Finally, we are also very appreciative of the work NRCS has done in this space for nearly 100 years. As their close core partner we have watched them troubleshoot and refine their programs. We recommend mirroring this program as much as possible off the NRCS programs in order to avoid confusion, leverage resources, and avoid unforeseen pitfalls.

As enthusiastic partners, we want this program to be successful and offer these suggestions to strengthen the implementation of the program. Please call on us to assist in any way we can be useful.

Below is a summary of our requests with additional detail on each point following. Please feel free to reach out to get additional information, examples or if we can be of assistance in clarifying any of our points.

We also want to note that some of these issues are large enough that they may bar some RCDs from applying for this program by making it unaffordable for them to participate.

#### **Summary**

Our recommendations for the 2021 Conservation Agriculture Planning Grants Program Draft Request for Proposals are as follows:

- Indirect cost rates that have been vetted and approved by cognizant agencies should be accepted rather than setting a cap at 20% for most organization, but allowing for a higher cap for others.
- The actual cost of the work should be fully reimbursed rather than on a set payment rate.
- Critical Project Review requirements to repay CDFA if milestones are not met are not fair and should be removed or revised.
- Administrative costs related to project management, tracking of the budget and deliverables, and regular invoicing and reporting are required for the work to get done and should be an allowable expense.
- The application process should be on a rolling basis- thanks for including a rolling application process in the requirements
- The 10% withheld can be onerous for small entities

#### Additional detail to support the requests:

#### Indirect Costs:

We recommend that RCDs be included with UC and CSU to claim their established indirect cost rates.

In the guidelines, UC and CSUs may claim their established indirect cost rates, but other applicants are limited to 20%.

Indirect costs are essential for delivering projects, and include items such as rent; insurance; work stations and meeting spaces; utilities; office supplies; IT support and software; administrative staff; bookkeeping and accounting; legal consultant and review of contracts, labor practices, policies, etc.; development of financial, personnel, safety, and other policies; annual financial audits, staffing to prepare, notice, and support public Board meetings; other staff time that cannot be billed to specific projects, e.g. participation in this review and comment process, staff meetings, staff trainings, etc.; costs to comply with Division 9, the Brown Act, and other governmental codes that ensure our accountability and transparency. Negotiated Indirect Cost Rates are based on audited financials, which are then reviewed by the cognizant federal agency over the course of many months. They are highly vetted and based on actual costs to operate as an organization. The grant program as currently proposed would limit our ability to recover our true costs, meaning that we would lose money by accepting the grant unless we were able to secure private donations or funding to deliver this CDFA program.

The recovery of indirect costs is a common and essential accounting practice at federal, state, and local levels. Indirect costs are defined by California's Office of the Controller in the December 2018 Edition of the Special District Uniform Accounting and Reporting Procedures as "those elements of cost necessary in the production of a good or service that are not directly traceable to the product or service. Usually these costs relate to objects of expenditure that do not become an integral part of the finished product or service, such as rent, heat, light, supplies, management and supervision (indirect costs/charges/expenses.)"

RCDs function like CSU and UC in the sense that they are publicly transparent organizations that must comply with public accountability laws like the Brown Act. We should be able to cover this full cost.

#### 10% withheld can be onerous to small orgs:

The 10% withheld can make cash flow for small organizations difficult. It adds to the cost of doing the grants and makes it hard to pay contractors and staff. A grant award of \$250,000 would mean that \$25,000 would be withheld. While this may not seem like a lot of money, for a small organization that has an operating budget of \$100,000, this can cause hardship. This is especially true in applying this to the advanced payments for organizations that qualify for advanced payments.

#### Critical Project Review:

The draft proposal states that if, after a Critical Project Review, it is determined that "the grant recipient is not meeting and is unlikely to meet certain milestones, CDFA has the right to terminate the Grant Agreement pursuant to the Terms and Conditions of the Grant Agreement. If the grant is terminated and has incurred any costs during the term, the Grantee must return any previously reimbursed funds."

The grant proposal does not require that an applicant know what operations they will service, and thus must make an estimate as to the number and type of plans they will complete. If a grantee has done work that was sufficient enough that CDFA approved it and reimbursed for it, it is unfair to request those funds be returned. In addition, that request could bankrupt small organizations. We know that is not the intent of the program or CDFA.

#### Pavment Rates:

CDFA should reimburse awardees for the true cost of the work organizations are undertaking to further CDFA's goals.

The proposed payment rates don't reflect actual costs of plan development or variability in income and cost of living throughout the state.

The project budget on a per plan basis does not allow for any administrative costs associated with compiling quarterly reports and invoices. The payment rates also do not account for the time it takes to identify producers and discuss and decide what plans best align with their operational objectives.

Many of these plans are property scale plans, and require time to do comprehensive assessments, meet with producers, compile maps, research unique aspects of the property (like an uncommon management technique or special status species present), make and review recommendations with producer, and compile reports for producer and CDFA. The reimbursement rates are not enough for someone making livable wages and receiving benefits to prepare high-quality plans. CDFA should pay for the true cost that an awardee spends to further CDFA's goals through this program, which may be more or less than the per unit reimbursement rates proposed.

For example, the Soil Health Management Plans are required to include:

- Site information, including a digital conservation plan map that includes property and field lines and acreage
- Client interview and documentation of objectives

- Inventory of resources, including:
  - a. Crops grown, and planned rotation by field
  - b. Tillage, planting, weed management and harvest equipment used
  - c. Soil amendments used (e.g. compost, manure, biosolids, gypsum, lime, etc.)
  - d. Typical nutrient program including forms, rates and timing of applications
  - e. Typical pesticides used
  - f. Kind/class of livestock and number,
  - g. Cover crop use, including species, and planting and termination methods
  - h. Soil water management concerns (i.e. field too wet or too dry at planting)
  - i. Soil maps and descriptions, to include:
    - i. Map unit and texture
    - ii. Drainage class and hydrologic soil group
    - iii. Ecological site and forage suitability group (when applicable)
    - iv. Soil health properties and interpretations (where appropriate)

Calculations from current erosion prediction technology used to include estimates of SCI and STIR

- Assessment of resource concerns, including an in-field /pasture soil health assessment
- Documenting long-term goals and developing an individualized plan to build soil health through adopting new practices and providing alternatives for incorporating innovative technology or management changes. Record decisions (planned and applied conservation practices) for the land where conservation practices to maintain or improve soil health resource concerns will be applied. This includes documentation for all currently applied practices that will be maintained, as well as all the planned practices with a schedule for implementation to include the month and year of planned application and amount.
- The development of two plans, one for the client, and one for NRCS.

The proposed payment rate would only cover 38 hours (using the average billing rate of eligible staff) to do all the above-mentioned work. That is not an adequate amount of time for the project. Organizations would have to cover that time from outside sources or their general fund- neither of which are often available.

In addition, organizations that cannot bill their indirect cost rate will already be partially covering the cost of this program. By not reimbursing for all hours worked, organizations will be recovering even less of their costs and their ability to apply to this program to expand services to agricultural producers will depend on their ability to contribute other funds to complete the work, favoring organizations with baseline funding or operational funds, which many RCDs do not have. CDFA should reimburse awardees for the true cost of the work organizations are undertaking to further CDFA's goals.

We understand and agree with CDFA's desire to set reasonable cost frames for the projects. That is why we ask that a reasonable cost frame be included so that small organizations are not shouldering the cost of doing work for the State. This greatly hinders the solvency of small organizations and our ability to complete other, equally pressing work.

#### Carbon Farm Plans:

CDFA should support the development of Conservation and Carbon Farm Plans by reimbursing the awardee for the cost of developing the plans.

Many RCDs create comprehensive carbon farm plans for farmers and ranchers. To be accurate, the plans require a substantial amount of time to conduct assessments of soil, habitat, and vegetation; create maps; utilize NRCS planning tools; develop and map recommendations; and compile reports. A carbon farm plan averages between 80-110 hours depending on the size of the property and complexities of the landscape and management practices. CDFA should support the development of Conservation and Carbon Farm Plans by reimbursing the awardee for the cost of developing the plans.

#### **Timing**

Conservation takes time. 18 months is a short award frame and will not allow for the unforeseen circumstances that appear in almost every project. We request that the contracts last at least 24 months to ensure the time to get it right.

#### **Application Process**

We recommend that CDFA follow the NRCS model of rolling applications rather than a competitive grant round. The rolling model allows practitioners to fully develop plans and projects and doesn't unnecessarily force planning into an arbitrary window. We feel that better projects will develop with a more natural funding cycle.

#### **Summary**

In conclusion, our recommendations for the 2021 Conservation Agriculture Planning Grants Program Draft Request for Proposals are as follows:

- Indirect cost rates that have been vetted and approved by cognizant agencies should be accepted rather than setting a cap at 20% for most organization, but allowing for a higher cap for others.
- The actual cost of the work should be fully reimbursed rather than on a set payment rate.
- Critical Project Review requirements to repay CDFA if milestones are not met are not fair and should be removed or revised.
- Administrative costs related to project management, tracking of the budget and deliverables, and regular invoicing and reporting are required for the work to get done and should be an allowable expense.
- The grant awards should be longer than 18 months
- The application process should be on a rolling basis

Thanks for your thoughtful consideration of our recommendations. Please feel free to reach out for additional clarification, examples or if we can be of assistance.

Sincerely,

Feren Buh

Karen Buhr Executive Director

# **AGENDA ITEM 11**

# **AGENDA ITEM 12**