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

Page: 3

Number: 1Author: tthompson Subject: Comment on TextDate: 9/20/2021 5:35:19 PMDoes 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: thompson 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: 2Author: tthompson Subject: Comment on TextDate: 9/20/2021 5:41:36 PMThank you for including this. This helps address a huge barrier for many Tribal applicants.

From:	Malcolm O'Meara <malcolm.omeara@fwe.energy></malcolm.omeara@fwe.energy>
Sent:	Friday, September 24, 2021 10:37 AM
То:	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.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 41st 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</u> <u>conservation planning¹</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 California² 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.

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

¹ Assembly Bill (AB) 350 Agriculture: Cannella Environmental Farming Act of 1995: technical assistance grant program: groundwater conservation planning.

² Public Policy Institute Water and the Future of the San Joaquin Valley. February, 2019. <u>https://www.ppic.org/wp-content/uploads/water-and-the-future-of-the-san-joaquin-valley-overview.pdf</u>.

- 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 <u>rebecca@marcusgovstrategies.com</u>.

Sincerely, Katie Patterson

Katu Patterson

California Policy Manager American Farmland Trust



October 15, 2021

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

Comments Submitted via: 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</u> <u>Environmental Farming Act of 1995: technical assistance grant program: groundwater conservation planning¹</u>. 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 California² 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 offer the following priorities for consideration and integration in this program:

¹ 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.

² Public Policy Institute Water and the Future of the San Joaquin Valley. February, 2019. <u>https://www.ppic.org/wp-content/uploads/water-and-the-future-of-the-san-joaquin-valley-overview.pdf.</u>





- 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.

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Stephanie Anagnoson Director of Water and Natural Resources 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:

- 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.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</u> <u>conservation planning¹</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 California² 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 <u>Eligibility</u> section: include Groundwater Sustainability Agencies, and local agencies.
- 3.) Under Program Requirements section,
 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;

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

¹ Assembly Bill (AB) 350 Agriculture: Cannella Environmental Farming Act of 1995: technical assistance grant program: groundwater conservation planning.

² Public Policy Institute Water and the Future of the San Joaquin Valley. February, 2019. <u>https://www.ppic.org/wp-content/uploads/water-and-the-future-of-the-san-joaquin-valley-overview.pdf</u>.

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.

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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.

Pelayo Alvarez, PhD California Director Audubon Conservation Ranching Program 530-304-0781





ALBA NO-BASED TRAINING ASSOCIATION

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.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.¹ 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

¹ California Dept. of Food and Agriculture Office of Environmental Farming & Innovation. <u>Conservation Agriculture Planning Grant Program: Draft</u> <u>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.² 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

² 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.³ However, when measured per economic unit of agricultural production, California ranks 38th nationally in public funding for agricultural research and Cooperative Extension,⁴ and over the past 20 years the total number of UC Specialists and Farm Advisors has dropped precipitously from 427 to 269 positions.⁵ With only one of these positions specifically dedicated to organic production, less than 0.5% of total UC resources go to organic specialists⁶ in a state where organic makes up 20% of the total value of agriculture⁷ and accounts for 40% of organic production value nationally.⁸

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.

Rebekah Weber Policy Director CCOF

Nathan Harkleroad Program Director ALBA

³ 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.

⁴ 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. ⁵ Humiston, G. 2021. UC ANR Budget and Staffing Analysis to Meet the Needs of All Californians. Response to Senate request posted at https://ucanr.odu/cites/Brofessional_Dovelopment/Building_Support/Advessary/ Ap.edvested guess on the number of UCCE positions that will be

https://ucanr.edu/sites/Professional_Development/Building_Support/Advocacy/. 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.

⁶ 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%.

⁷ Based on calculations using data reported in California Department of Food and Agriculture. 2021. *California Agricultural Statistics Review 2019-2020.*

⁸ 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.



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.

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Carlos Villapudua, Assemblymember, 13th District



October 19, 2021

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</u> <u>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."¹ 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.² 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.³ For example, cover cropping builds soil organic matter while maintaining soil structure so that water is better retained when it falls on fields.⁴ If half of California's croplands were planted with cover crops, California farms could increase soil's water storage potential

https://www.cdfa.ca.gov/oefi/efasap/docs/20210429_Binder_EFA_SAP.pdf

NATURAL RESOURCES DEFENSE COUNCIL

¹ PUBLIC MEETING OF THE CDFA ENVIRONMENTAL FARMING ACT SCIENCE ADVISORY PANEL. April 29, 2021.

² 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

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

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

by 10.9 billion gallons and sequester 540,000 metric tons of greenhouse gasses.⁵ 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,⁶ improved water quality,⁷ better habitat and migratory corridors for fish and wildlife,⁸ replenished groundwater aquifers,⁹ 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,¹² 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 (<u>USDA NRCS CPS 391</u>) and riparian herbaceous cover (<u>USDA NRCS CPS 390</u>) 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.¹³ To maximize the climate

https://babel.hathitrust.org/cgi/pt?id=uiug.30112059865722&view=1up&seq=3

⁵ 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

⁶ 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

⁷ 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

⁸ Cloern 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. <u>https://doi.org/10.1016/j.scitotenv.2021.147097</u>

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

¹⁰ Assoc. of State Floodplain Managers, Natural and Beneficial Floodplain Functions: Floodplain Management – More than Flood Loss Reduction, Sept. 2008. <u>https://s3-us-west-2.amazonaws.com/asfpm-library/FSC/General/ASFPM_Natural_Floodplain_Functions_2008.pdf</u>; FEMA, The natural and beneficial functions of floodplains: reducing flood losses by protecting and restoring the floodplain environment: a report for Congress, 2002.

¹² 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

¹³ 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.¹⁴ 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.

Arohi Sharma Water Policy Analyst Nature Program

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



Bringing Water Together

October 19, 2021

Submitted via 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 ivyb@acwa.com or (916) 441-4545 if you have any questions regarding ACWA's input.

Sincerely,

Ing Brittain

Ivy Brittain Senior Regulatory Advocate

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



October 19, 2021

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.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.

Todd Sanders Executive Director California Apple Commission



October 19, 2021

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 cdfa.ca.gov

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.

Todd Sanders Executive Director California Blueberry Commission



October 19, 2021

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 cdfa.ca.gov

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.

Todd Sanders Executive Director California Wild Rice Advisory Board



October 19, 2021

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.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

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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.

Todd Sanders Executive Director Olive Growers Council of California





October 19, 2021

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.¹ Therefore, while plans can be an important first step, CDFA must implement programs that result in actual pesticide use reduction.

¹ 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 Extension²
- Over the past two decades the number of UC specialists and farm advisors has decreased by one-third.³
- 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.⁴ UC ANR has requested an additional 15 IPM advisors and specialists -- the second highest requested for a UC ANR program.⁵
- Only one position focuses on organic production, meaning less than 0.5% of total UC resources go to organic specialists⁶ in a state where organic makes up 20% of the total value of agriculture⁷ and accounts for 40% of organic production value nationally.⁸

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

² 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.

³ 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/.

⁴ 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/.

⁵ 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/.

⁶ 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%.

⁷ Based on calculations using data reported in California Department of Food and Agriculture. 2021. California Agricultural Statistics Review 2019-2020.

⁸ 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,

ane S

Asha Sharma California Organizing Director, Pesticide Action Network

Margaret Reces

Margaret Reeves Senior Scientist, Pesticide Action Network

Jare Seller

Jane Sellen Co-Director, Californians for Pesticide Reform

Sal C. a.l.

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.



October 19, 2021

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 applaud 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, <u>the Grantee must return any previously reimbursed funds</u>."

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.

Payment 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.

Faren Buch

Karen Buhr Executive Director