

Name	Organization	Date Comment Received	Summarized Comment	Response
Marie Bordin-Huitt		8/26/2021	Farmers should be able to apply more than once on the same Assessors Parcel Number (APN).	SWEEP projects are expected to have a ten year project life so that project benefits can be estimated and a commitment shown by the awardee. Having the same APN receive multiple awards will result in CDFA unable to keep track of the different projects on the same APN. CDFA does allow the same APN to be used for other funding such as USDA NRCS EQIP funding.
Kelly O'Roke	The Redwood Alternative Agriculture Fund	8/26/2021	CDFA should not exclude regulated/legal cannabis farms from applying for and receiving a SWEEP grant.	CDFA SWEEP requires baseline records that would not be available from cannabis growers. Also, cannabis farms may operate differently from what we know as a typical agriculture operation for food production. Thank you for the comment; CDFA is evaluating this request. CDFA has received funding for research to be conducted to collect the information needed to evaluate if cannabis farms could be included int the SWEEP program.
Kendall Barton	Tule Technologies	9/3/2021	CDFA should make it clear to the technical reviewers that Tule is an allowable technology.	CDFA SWEEP supports the installation of irrigation water management tools, but does not promote specific brands of technology. Farmers are provided the flexibility to choose the vendor they would like to use.
Tom Shapland	Tule Technologies	9/3/2021	Software-As-A-Service should be added to the description of allowable costs that are associated with Irrigation Water Management (IWM). Additionally, Actual Evapotranspiration (ET) and Reference ET should be more clearly explained and differentiated in the RGA (suggested language is included in the comment).	Irrigation water management scheduling software and technology are allowable costs. CDFA SWEEP supports the installation of irrigation water management tools, but does not promote specific brands of technology.
Dennis Hutson	Farmer –Tulare County	9/15/2021	CDFA should allow for historically under-served, small scale farmers to apply for SWEEP funding more than once on an APN to facilitate adaptation to drought and changes to water supplies.	SWEEP projects are expected to have a ten year project life so that project benefits can be estimated and a commitment shown by the awardee. Having the same APN receive multiple awards will result in CDFA unable to keep track of the different projects on the same APN. CDFA does allow the same APN to be used for other funding such as USDA NRCS EQIP funding. CDFA prioritizes funding in the amount of 25% of the total funds for socially disadvantaged farmers and ranchers. A definition for socially disadvantaged farmers and ranchers (SDFRs) is provided in the RGA.
Roosevelt Tarlesson	Solano County farmer	9/15/2021	CDFA should improve outreach to Socially Disadvantaged Farmers and Ranchers (SDFRs) to ensure that they have sufficient technical assistance resources and time to develop applications. It is important that CDFA ensure that SDFRs understand all aspects of the funding opportunity and the requirements and restrictions of the program.	CDFA supports SDFRs with technical assistance resources. Technical Assistance Providers are required to prioritize their services in outreach and assistance to SDFRs. Additionally, CDFA has developed a funding target for SDFRs in the amount of 25% of total funds.
Jacob Roberson	UCCE Fresno (Small Farms Assistant)	9/21/2021	A rolling application process is not a good change for SWEEP as it will make it more difficult for small, socially disadvantaged family farmers to apply and receive funding because larger farms can pay for someone to submit their application and will have an advantage because they can turn in an application as soon as CDFA begins accepting applications. Small farmers are often occupied by doing everything else on the farm and will need time to complete the applications and get required calculations and quotes. Glad to see that variable frequency drives are still an allowable expense for a SWEEP project. Glad to see the maximum award amount being increased to \$200,000 and the grant duration being extended to 24 months.	The rolling application process allows time for disqualified or low-scoring applicants to reapply if the funding still remains. Also, the rolling review process with a minimum score for award helps to maintain the rigor of the technical program while reducing any individual applicant's competition with other applicants. The total application timeline has increased from two months to four months to accomdate more time of farmers to turn in their application.
Nathan Amarante	Farmer	9/22/2021	The requirement that individual APNs can only be funded once should be changed. Indicated that some farmers only have one APN and would not be able to continue to improve their land through SWEEP funds.	SWEEP projects are expected to have a ten year project life so that project benefits can be estimated and a commitment shown by the awardee. Having the same APN receive multiple awards will result in CDFA unable to keep track of the different projects on the same APN. CDFA does allow the same APN to be used for other funding such as USDA NRCS EQIP funding.
Taylor Thompson	Food Sovereignty Division Manager of the Yurok Tribe	9/20/2021	Funds should be set aside for Tribal Organizations. Tribes are at a disadvantage due to poor internet connectivity, having a lengthy internal review process prior to applying, and having to navigate multiple stakeholder parcels. It's critical to provide funding opportunities to new food producers so that they can start with a high-efficiency system. There should be a grant set up as part of the SWEEP program (or separate program), that would fund the installation of flow meters on new agricultural sites. Fuel costs, drive time, project management, and other currently unallowable costs should be included as fundable parts of the grant. Irrigation training should be a reimbursable expense.	Individuals belonging to tribes or tribal organizations have some priority in that they are included in the definition of SDFRs; SWEEP will set aside 25% of funds for projects that belong to SDFRs and/or benefit Priority Populations. Technical assistance providers will also prioritize their assistance to SDFRs and tribes and can provide internet and computer resources. SWEEP's objective to conserve water and reducing GHG is not aligned with conversion of non-agricultural land to irrigated agricultural lands will result in increased water use and emissions so are ineligible through SWEEP. Project management costs have been unallowable and if they were allowable would use of significant funds; reducing the environmental benefits of projects. Additionally drive time, fuel costs and project management costs are difficult to track and validate for purpose of reimbursement. CDFA has provided links to numerous free training options on the Irrigation Technical Resources page.
Roy Perkins	Vitidore	9/14/2021	Soil management practices that are part of SWEEP should be allowable costs for reimbursement by the program. Soil management practices are currently an additional consideration and are not allowable costs.	CDFA has a Healthy Soils Program (HSP) that supports the implementation of soil management practices. The HSP has specific implementation specifications with a high level of scientific rigor; SWEEP does not have a similar level of accountability around the soil management practices and GHG benefits are not estimated due to the practices. For these reasons awardees seeking reimbursement for soil management practices should apply for funding through the Healthy Soils Program.

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David Runsten	Community Alliance with Family Farmers	9/22/2021	<p>SWEEP should be a water-use efficiency program (not principally a greenhouse gas reduction program). With the program no longer being funded from the Greenhouse Gas Reduction Fund, CDFA should expand assistance to areas that use only surface water. SWEEP funds should be allowed to be used to install new groundwater wells and increase well depth. Part of the money should be appropriated for use in a stand-alone program on drought assistance for farmers producing food for local markets and focusing on making dewatered wells operable. Cost assessments for how such a program would work were included in the comment including costs associated with deepening a well and lowering the pumping level. The maximum award should be capped at \$100,000 so that more farmers can receive funding, that CDFA should change the application process from a first-come-first-serve application process to a 12-week application process, allow for grant projects that do not reduce GHG but save water, and allow for projects to be funded that involve deepening a well.</p>	<p>As part of CDFA's Climate Smart Agriculture suite of programs, the SWEEP program also advances the state's GHG mitigation goals and aligns with California policies related to water.</p> <p>Funding the drilling of new groundwater wells or lowering a well would be in misalignment with the state's efforts to support sustainable groundwater use. Additionally, new well drilling or lowering would not result in a GHG reduction or water savings. With rising costs for irrigation system components and commodities, increasing the maximum award to \$200,000 will allow for more impactful projects with multiple components and holistic improvement. Additionally, small acreage farms have higher per acre costs and can also benefit from the increased maximum award. Applicants may request less than the maximum award.</p> <p>The rolling application process allows time for disqualified or low-scoring applicants to reapply if the funding still remains. Also the rolling review process with a minimum score for award helps to maintain the rigor of the technical program while reducing any individual applicant's competition with other applicants. The application time period is being increased from two to four months.</p>
Brian Shobe	CalCAN	9/22/2021	<p>SWEEP should maintain a maximum award limit of \$100,000 to enable more farmers to participate in the program. Lowering the maximum award amount would result in a higher participation rate of small farmers.</p> <p>Establish a pilot to enable more farmers in southern California to participate. Supported the recommendation from the Ad Hoc Advisory Committee to divide funding into two categories, water-focused and water-and GHG-focused.</p> <p>Immediate drought assistance for small farms with dewatered wells. Indicated that wells running dry is a serious problem during the drought, particularly with small farms.</p> <p>Indicated that CDFA should carefully weigh the pros and cons of a first-come, first-serve selection process and consider a 12-weeks application period and competitive grant review process. Noted disadvantages of current application process to first time applicants, smaller-scale farmers, and farms who face language barriers, and farmers who need to get a pump test done in a short timeframe. Indicated that the process would likely have unintended consequences of rendering the extra points from the "additional considerations" inconsequential since the average project score over the last two rounds was 39 and 40 out of 50.</p>	<p>With rising costs for irrigation system components and commodities, increasing the maximum award to \$200,000 will allow for more impactful projects with multiple components and holistic improvement. Additionally, small acreage farms have higher per acre costs and can also benefit from the increased maximum award. Applicants may request less than the maximum award. Thank you for the comment regarding the pilot; CDFA is evaluating this request.</p> <p>As part of CDFA's Climate Smart Agriculture suite of programs, the SWEEP program advances the state's GHG mitigation goals and aligns with our California policies related to water.</p> <p>Funding the drilling of new groundwater wells or lowering a well would be in misalignment with the state's efforts to support sustainable groundwater use. Additionally, new well drilling or lowering would not result in a GHG reduction or water savings. CDFA does not have an established metric to evaluate farm size.</p>
Caddie Bergren	UCANR: Community Education Specialist	9/23/2021	<p>SWEEP applications should be accepted during a set application window instead of on a rolling basis. Applicants who do not speak English, smaller growers, and others who have less knowledge of the program are at a significant disadvantage with a first-come, first-serve process. The program is very popular and funds could be expended before many competitive applications are submitted, especially by disadvantaged growers.</p> <p>Indicated that the requirement to test every pump will discourage smaller farmers from applying due to the upfront costs.</p> <p>Indicated that some farmers are able to get around the one grant award per applicant per cycle process by having multiple tax identification numbers or a list of social security numbers from family members to max out the grant award, but acknowledged that this is a challenging situation to solve.</p>	<p>CDFA has flexibility in accepting pump tests that are two years old; the pump test is a critical input to estimating greenhouse gas emissions and potential reductions. Also, often a pump test would be a key step in implementing a change to an irrigation system or preparing a project design.</p> <p>CDFA limits the funding that an individual can obtain by limiting an individual to one application per funding cycle and a maximum of \$600,000 cumulative SWEEP funding so that funds can be distributed widely to farmers and ranchers.</p>

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Daniele Zaccaria	UCCE Department of Land, Air and Water Resources	9/23/2021	<p>Eight recommendations presented:</p> <ol style="list-style-type: none"> 1) Reduce the maximum award to \$100,000 to enable more farmers to participate. 2) Divide funds into two categories: Water-focused and Water and GHG- focused projects and allocate specific funding amounts for each category. 3) Utilize a portion of SWEEP's funding for assistance to small farms where wells have run dry. Use funds to lower well depth and reconstruct existing wells that have been dewatered. 4) Adopt a two-step application process and request documentation such as pump tests, power bills, and water use records during the second stage of the application. This will allow time for small farmers to get organized with the needed information for a successful application. 5) Allow for additional advance payments, especially for small and disadvantaged farmers. 6) Allow other sub-surface water application methods for dairy effluent relative to SDI system. 7) Allow for sufficient time for technical reviewers to perform high-quality work in reviewing SWEEP applications and do not give them heavy workloads with weekly or limited timelines. 8) Allow for SWEEP funds to be spent on sub-surface application of other effluents, such as process water from food processing plants in addition to dairy effluents. 	<ol style="list-style-type: none"> 1) With rising costs for irrigation system components and commodities, increasing the maximum award to \$200,000 will allow for more impactful projects with multiple components and holistic improvement. Additionally, small acreage farms have higher per acre costs and can also benefit from the increased maximum award. Applicants may request less than the maximum award. 2) As part of CDFA's Climate Smart Agriculture suite of programs, the SWEEP program advances the state's GHG mitigation goals and aligns with California policies related to water. 3) Funding the drilling of new groundwater wells or lowering a well would be in misalignment with the state's efforts to support sustainable groundwater use. Additionally, new well drilling or lowering would not result in a GHG reduction or water savings. CDFA does not have an established metric to evaluate farm size. 4) CDFA has flexibility in accepting pump tests that are two years old; the pump test is a critical input to estimating greenhouse gas emissions and potential reductions. Also, often a pump test would be a key step in implementing a change to an irrigation system or preparing a project design. 5) In the upcoming solicitation, CDFA intends to offer additional advance payments to SWEEP awardees with proper justification. 6) SWEEP applicants may propose a custom irrigation project. All applicants, including those applying to install SDI for dairy manure effluent must utilize the GHG and water tools to estimate benefits. Applicants may submit proposals for other technologies that utilize dairy manure effluent for irrigation. 7) CDFA strives to give awardees ample time to complete projects. In order to meet encumbrance and liquidation deadlines, CDFA aims to keep administrative processes efficient and succinct whenever possible. 8) SWEEP applicants may propose a custom irrigation project. All applicants must utilize the GHG and water tools to estimate benefits. Applicants may submit proposals for other technologies to apply effluent for irrigation if the grant request remains within the scope of irrigation.
Karen Buhr and Sara J. Letton	CA RCD	9/23/2021	An applicant should be able to pay for technical assistance with the awarded funds that come from a SWEEP grant.	5% of every SWEEP appropriation is made available to technical assistance providers to provide free one-on-one assistance to farmers and ranchers. Some organizations are able to offer assistance statewide. Additionally, CDFA cannot reimburse for costs that occur outside of the grant term.
Najee Johnson	Ceres imaging	9/23/2021	<p>Supports the Ad Hoc Advisory Group's recommendation that SWEEP should allow moveable technologies to be included in a project. The majority of innovation in water efficiency technology in agriculture falls into precision agriculture. These technologies include soil moisture sensors and remote sensing technology such as aerial imagery.</p> <p>Indicated that CDFA should clarify in the application that other practices that are not on the short list of common practices are allowed and encouraged. The list should include remote sensing technologies and water efficiency data products.</p>	<p>The SWEEP program estimates the benefits of SWEEP project over 10 years and those calculations are based upon the conditions in the field where the project occurred. CDFA tracks project eligibility to the APN.</p> <p>CDFA allows for applicants to include various technologies and has a "other management practices" category on the budget worksheet and application where applicants can explain the need for technologies that are not included in the list of common practices. CDFA does not promote specific brands, technologies or practices.</p>
Charles R. Delgado	Sustainable Conservation	9/23/2021	Supports the changes to establish a maximum grant award of \$200,000 and the \$2 million set-aside for sub-surface drip irrigation systems to apply dairy effluent to field crops.	
Ruth Dahlquist-Willard	Small Farms and Specialty Crops Farm Advisor UCCE Fresno	9/23/2021	<p>The maximum award capped at \$100,000 to allow more famers overall to participate.</p> <p>Additionally, support for farmers whose wells have gone dry with some drought assistance.</p> <p>Indicated that they would like to see a return to the competitive grant review process and not move forward with the first-come, first-serve process. Indicated that the competitive process will promote a more equitable distribution of the grant funds and will not allow for larger farms with more resources to apply earlier and be given an advantage.</p>	<p>With rising costs for irrigation system components and commodities, increasing the maximum award to \$200,000 will allow for more impactful projects with multiple components and holistic improvement. Additionally, small acreage farms have higher per acre costs and can also benefit from the increased maximum award. Applicants may request less than the maximum award.</p> <p>Funding the drilling of new groundwater wells or lowering a well would be in misalignment with the state's efforts to support sustainable groundwater use. Additionally, new well drilling or lowering would not result in a GHG reduction or water savings. CDFA does not have an established metric to evaluate farm size.</p> <p>The rolling application process allows time for disqualified or low-scoring applicants to reapply if the funding still remains. Also the rolling review process with a minimum score for award helps to maintain the rigor of the technical program while reducing any individual applicant's competition with other applicants.</p>
Khaled Bali	Statewide Irrigation Water Management Specialist UCANR	9/23/2021	The maximum award limit be reduced to \$100,000 so that more farmers can participate in the program. Additionally, recommends that the dairy effluent projects consider other viable methods and technologies that are recommended by research institutions such as automated surface irrigation and other subsurface irrigation methods that are not SDI.	<p>With rising costs for irrigation system components and commodities, increasing the maximum award to \$200,000 will allow for more impactful projects with multiple components and holistic improvement. Additionally, small acreage farms have higher per acre costs and can also benefit from the increased maximum award. Applicants may request less than the maximum award.</p> <p>SWEEP applicants may propose a custom irrigation project. All applicants, including those applying to install SDI for dairy manure effluent must utilize the GHG and water tools to estimate benefits. Applicants may submit proposals for other technologies that utilize dairy manure effluent for irrigation.</p>

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Jason J. Morris	Farmer	9/23/2021	<p>Indicated that they have a well that is failing and that the most efficient thing to do is to develop a new well and retire the old one. The current RGA does not allow for a new well to be drilled as part of the grant.</p> <p>Small farmers are at a competitive disadvantage to that of there larger counterparts. Large farms can afford to drill deeper wells and wait until funding become available to bring up the efficiency. Smaller farmers might only have one or a few wells and they are heavily reliant on those wells. Would like CDFA to reconsider the rules for well replacement, especially for small acreage farms.</p>	<p>Funding the drilling of new groundwater wells or lowering a well would be in misalignment with the state's efforts to support sustainable groundwater use. Additionally, new well drilling or lowering would not result in a GHG reduction or water savings. CDFA does not have an established metric to evaluate farm size.</p>