

Comments Received on the CDFA SWEEP Program
Comment Period : July 25, 2018 - September 12, 2018

Category	Comment Received	CDFA Response
1. Eligibility	Confirm that Native American Tribes or Tribal agricultural enterprises/entities are eligible for SWEEP funding.	The final SWEEP Request for Grant Applications (RGA) will specify that Native American Tribes and Tribal agricultural entities are eligible for funding.
	Reduce the cumulative program funding cap to \$300K per operation.	During the technical review process additional consideration is given to previously unawarded applicants. CDFA is unable to implement a reduced cap at this time because previous notice of a reduced cap was not provided. This topic will be discussed at a future Environmental Farming Act (EFA) Science Advisory Panel (SAP) meeting.
2. Project Types	Propose that open air carbon enrichment be a project type eligible for SWEEP funding.	SWEEP may fund practices that reduce greenhouse gas emissions and save water in crop irrigation settings. CDFA's Office of Environmental Farming and Innovation (OEFI) does not believe that the water and GHG benefits of this practice can be captured in the required calculator. EFA SAP should consider a new practice proposal process in the future.
	Propose that sensor-controlled livestock soaker products should be considered for this program and include dairies to apply to further meet CDFA SWEEP program's goals.	The scope of the SWEEP program is limited to agricultural crop irrigation systems.
3. Outreach	As required by the Farmer Equity Act of 2017, prioritize outreach to and track participation of Socially Disadvantaged Farmers and ranchers.	CDFA hired a Farm Equity Advisor on September 20, 2018. OEFI will work in close consultation with the Farm Equity Advisor to incorporate requirements related to the Farmer Equity Act of 2017.
	Make educational materials about existing weather, evapotranspiration, and soil moisture monitoring systems and their alternatives available as part of the program materials.	CDFA OEFI does not make recommendations on technologies or irrigation equipment.
	Provide multilingual materials (flyer, FAQs, sample application).	CDFA will evaluate resources needed to provide multilingual materials and is working on a Spanish version of the flyer. Technical assistance providers are encouraged to provide multilingual materials.
4. Funding Requirements	Provide GHG reduction requirement waivers to farms in regions where gravity fed systems are primarily used or allow consideration of the water energy intensity.	SWEEP has dual requirements for water savings and GHG reductions.
	Recognize the need for flooding and micro-irrigation use in combination for the purpose of leaching salts	The SWEEP RFA indicates that awardees may keep existing flood irrigation infrastructure.
	In the situation where portable pumps are used on farms, allow the farm to estimate energy use by the number of irrigation events on the field.	Irrigation logs in tandem with fuel receipts for portable pumps are allowable supporting documentation for the GHG calculations.
	Add a geographical component to SWEEP so that farmers in California regions are competing against other farmers in the same region where systems are similar to each other.	SWEEP is a statewide competitive program. OEFI will suggest this topic for discussion at a meeting of the EFA SAP.

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	Develop and require irrigation management training for SWEEP recipients.	Course development is a function of University and State University systems. A list of available developed courses are provided on the SWEEP webpage for applicants to choose from when electing to qualify for additional consideration. Requiring irrigation training may create an additional burden for applicants, particularly those that already have training adequate to develop or implement an irrigation practice. CDFA recommends this remain an optional additional consideration.
5. Funding Source Combinations	Clarify whether United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) Environmental Quality Incentive Program (EQIP) funds can be used on complementary or supporting practices on the same APN, provided the applicant is not receiving funds for the same practice from both sources. For example, if funds are requested from SWEEP for an irrigation system and NRCS is funding cover crops or irrigation water management on the same property, is that considered the same "project"?	CDFA OEFI will further define this requirement in the RFA following consultation with USDA NRCS.
	Allow SWEEP and EQIP funds to be combined to meet the needs of farms practicing crop rotation. In crop rotation situations, the irrigation system components do not have a 10 year life making SWEEP funding not compatible. If SWEEP funds could be combined with EQIP, SWEEP funds could be used on the energy components while EQIP funds could be used on the irrigation system components (drip tape, etc.).	SWEEP funded projects must result in both water savings and GHG reductions and awardees are expected to maintain the project for 10 years.
	Coordinate with NRCS and water districts to maximize SWEEP impacts	CDFA OEFI consults with NRCS and solicits stakeholder (including water districts) input on SWEEP program improvements. OEFI will evaluate strategies to enhance outreach regarding water district incentive programs, NRCS incentives or other programs that could benefit California farms.
6. Technical Review	Improve the reviewers' experience and impact on the program.	CDFA OEFI attempts to improve the reviewer experience through training on the evaluation process prior to the application period and requesting reviewer feedback following each solicitation.
	Match reviewers with expertise in the region to the project applications from that region.	All SWEEP reviewers are technical irrigation experts affiliated with the University of California or California State University systems with broad expertise. Additionally, CDFA must consider workload for each reviewer.
	For expensive monitoring equipment such as weather stations and telemetry, ask applicants to justify why existing monitoring tools such as CIMIS are not sufficient.	CDFA has a robust technical review process in which technologies and project designs are evaluated on merit, feasibility and the proposed budget.
	Provide clear scoring criteria including guiding questions or scoring rubrics to help applicants assess the strengths/weaknesses of proposals and improve the quality of applications.	CDFA OEFI will recommend new scoring matrix to the EFA SAP. If adopted by the EFA SAP, this guidance will be included in the RFA.

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7. Scoring - Additional Considerations	Include Conservation Practice Standard (CPS) 327, Conservation Cover, in the list of soil management practices that increase soil water holding capacity. This is the practice used in California in permanent crops rather than CPS 340.	CDFA OEFI will consult with the United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) regarding the inclusion of CPS 327 in the soil management practice additional consideration.
	Consider approving conservation practice standard 449, Irrigation Water Management (IWM), as an irrigation training option for growers. If they are implementing a 449 practice as part of an NRCS funded conservation plan, they will receive technical assistance for irrigation efficiency specific to their site and irrigation system.	CDFA OEFI will accept CPS 449 irrigation plans certified by USDA NRCS for the purpose of meeting the irrigation training additional consideration. The awardee must provide the IWM plan to CDFA as verification of the training.
	The Farmer Equity Act of 2017 (Section 510 of the Food and Agricultural Code) should be applied. Add Socially Disadvantaged Farmers and Ranchers to the Additional Criteria options.	CDFA hired a Farm Equity Advisor on September 20, 2018. OEFI will work in close consultation with the Farm Equity Advisor to incorporate requirements related to the Farmer Equity Act of 2017.
	Allow the business location (as opposed to strictly the project location) to count towards the Severely Disadvantaged Community (SDAC) additional consideration.	Per the requirements of Proposition 68 regarding funding to Severely Disadvantaged Communities, CDFA must determine the location of the project based upon the location where the benefits of the project (e.g., water savings, GHG reductions) will be realized.
	Further define what types of activities and infrastructure will qualify for the additional consideration for storm water capture and reuse and water recycling. Recommend that a water re-use system must conform to governmental agency regulations.	After consulting with partner state agencies, CDFA OEFI will further define this additional consideration and require that applicants be in compliance with regulations.
8. Technical Assistance	Allow more flexible payments for technical assistance providers to pay for outreach and support for implementation. More financial and technical support is needed from CDFA for conducting workshop day to work with applicants.	CDFA has increased the grant award amount for technical assistance from \$5,000 in 2017 to \$20,000 in 2018. Of the \$20,000, up to \$5,000 per solicitation may be utilized to cover base expenses incurred by the providers, including staff time and outreach costs. Remainder funds are performance based, \$200 per individual assisted and \$400 for each submitted application.
	Technical assistance providers should be trained to better serve Socially Disadvantaged Farmers and Ranchers.	CDFA will evaluate requirements regarding the Farmer Equity Act of 2017 in consultation with the Farm Equity Advisor to be considered in future technical assistance efforts.
	Coordinate with stakeholders to improve SWEEP outreach, technical assistance, and irrigation management training.	CDFA OEFI will evaluate the effectiveness of the new technical assistance strategy and requirements.
	Increase funding for technical assistance and improve the application experience for farmers	CDFA has increased technical assistance funding and changed the assistance strategy to emphasize one-on-one assistance.
	Ensure the new platform allows applicants to share applications with technical assistance providers.	A technical assistance provider may create an application for an applicant using the technical assistance provider's account. More than one application can be submitted from an account.

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	Enhanced training for technical assistance providers to ensure the producers receive the best help possible.	Training is provided to technical assistance providers and on-demand assistance is provided to them from CDFA to address their queries.
9. Grant Process	To improve feasibility of the invoicing and reimbursement process allow recipients to move funds between supplies, equipment and labor without a line item shift if the amounts being moved are less than some percentage of the total award (such as 5% or 10%).	The CDFA Office of Grants Administration is examining the feasibility of this suggestion. If feasible, this change will be integrated into the terms and conditions of the program at the time awards are announced.
	Merge supplies and equipment into one category for materials.	Equipment and supplies have clear and unique definitions as described in the California grant regulations therefore merging the two into one category is not possible.
	Provide guidance up front on the required format for invoices to pump and irrigation companies, with an example invoice or a list of guidelines.	CDFA is developing an example invoice that will be included in the awardee package for reference.
	Restore advance payment eligibility to all grant recipients.	Options for advance payments are limited under Prop 68 funding. CDFA is currently determining the feasibility of broad implementation of an advance payment feature for this program. If feasible, this change will be integrated into the terms and conditions of the program at the time awards are announced.
	Allow real-time responses to questions submitted during the application period	In past funding cycles questions received during workshops and webinars have received real-time responses. Answering questions outside of the competitive FAQ process (such as email questions) is not feasible because accurate responses may require coordination between OEFI and the Office of Grants Administration. CDFA OEFI will provide work-hour availability to contracted technical assistance providers for SWEEP questions during the application period. CDFA is also evaluating the ability to increase FAQ postings.
	Lengthen the application period to 12 weeks.	CDFA is extending the application period to 8 weeks. A further extension to 12 weeks would delay awards and impact project implementation timelines. CDFA must consider funding source deadlines when setting program timelines.
	Streamline the application with autofill, checkboxes, etc.	The current SWEEP application is being developed and will take into consideration both the ease of applying for the program as well as effectively capturing the data that CDFA requires in order to make a funding decision and meeting funding source requirements.
	Convene irrigation experts, TA providers, and representatives from GSAs, water districts, and NRCS to help CDFA align SWEEP with long-term groundwater sustainability objectives and explore the barriers and opportunities for greater participation in southern California.	This is the role of the Environmental Farming Act (EFA) Science Advisory Panel (SAP).

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10. Consultation	Suggest that CDFA convene a meeting of SWEEP grant reviewers, technical assistance providers, NRCS, Department of Water Resources staff and some of the Groundwater Sustainability Agencies to discuss ways to support efficient irrigation management through SWEEP in ways that meet the goals of the program and positively contribute to sustainable groundwater management.	This is the role of the Environmental Farming Act Science Advisory Panel.
	Convene a committee of irrigation experts, technical reviewers, and TA providers to review and improve the program's water savings and GHG emissions calculators.	SWEEP calculators have been developed in coordination with subject matter experts. The GHG calculator was developed by the California Air Resources Board in coordination with CDFA and technical experts. CDFA coordinated the development of water calculator with NRCS
	Convene water and irrigation experts to help CDFA align SWEEP with long-term sustainability objectives	This is the role of the Environmental Farming Act Science Advisory Panel. CDFA OEFI can highlight this topic at future SAP meetings.
	Further explore the barriers and opportunities for participation in southern California	CDFA OEFI conducted a listening session in Imperial region on August 31 and solicited feedback. OEFI is also increasing funding to technical assistance providers in the region.
10. General	The SWEEP 2018 Request for Applications includes key changes from the 2017 SWEEP Program that will encourage greater participation from landowners.	Comment of support - thank you.

Note - Green color indicates comments and suggestions CDFA is able to consider for inclusion in the Program.