Date Receivec	Submitter	Summary of Comment	CDFA Response
11/29/202	2 Aaron Sikora, Cates & Company	The commenter expressed disagreement with the block grant format, indicating that the block grant pilot would be a disadvantage to growers.	The SWEEP Block Grant Pilot is proposed as a pilot program. Through the block grant framework CDFA would like to continue to build regional expertise to better service the diverse agricultural regions in California. Additionally, the use of a block grant framework can help CDFA to distribute some administrative costs to third-party organizations; this is necessary for CDFA due to the historic high appropriation of funding resulting in a labor- intensive grant management portfolio, the tight timelines to encumber and liquidate funds and the 5% cap on CDFA's own administrative budget. CDFA is planning a traditional round of SWEEP and funding will be made available for growers directly from CDFA.
12/6/2022	2 Chhinderpal Sihota	The commenter expressed disagreement with the block grant format, indicating that the block grant pilot would be a disadvantage to growers because it would decrease the pool of funds that have been historically over-subscribed. The commenter is concerned that the block grant style would overly complicate the application and implementation process, forcing growers to delay projects and practices.	The SWEEP Block Grant Pilot is proposed as a pilot program. Through the block grant framework CDFA would like to continue to build regional expertise to better service the diverse agricultural regions in California. Additionally, the use of a block grant framework can help CDFA to distribute some administrative costs to third-party organizations; this is necessary for CDFA due to the historic high appropriation of funding resulting in a labor- intensive grant management portfolio, the tight timelines to encumber and liquidate funds and the 5% cap on CDFA's own administrative budget. CDFA is planning a traditional round of SWEEP and funding will be made available for growers directly from CDFA. Leading up to the SWEEP block grant solicitation, CDFA will host workshops to help applicants and other stakeholders understand the program framework and how to engage. Regarding the concerns of delayed or complicated application and implementation processes for farmer, the SWEEP program has always required that administrative processes be completed before a project can begin. CDFA does not anticipate any significant increase in the delay associated with when a farmer or rancher initiates an application, is selected for funding, and then may begin the project. Since block grant organizations will have fewer on-farm projects to execute the agreement process may be improved.

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12/6/2022	Jasren Sihota, Prima Wawona	The commenter expressed disagreement with the block grant format, indicating that the block grant pilot would be a disadvantage to growers because it would decrease the pool of funds that have been historically over-subscribed. The commenter is concerned that the block grant style would overly complicate the application and implementation process, forcing growers to delay projects and practices.	The SWEEP Block Grant Pilot is proposed as a pilot program. Through the block grant framework CDFA would like to continue to build regional expertise to better service the diverse agricultural regions in California. Additionally, the use of a block grant framework can help CDFA to distribute some administrative costs to third-party organizations; this is necessary for CDFA due to the historic high appropriation of funding resulting in a labor- intensive grant management portfolio, the tight timelines to encumber and liquidate funds and the 5% cap on CDFA's own administrative budget. CDFA is planning a traditional round of SWEEP and funding will be made available for growers directly from CDFA. Leading up to the SWEEP block grant solicitation, CDFA will host workshops to help applicants and other stakeholders understand the program framework and how to engage. Regarding the concerns of delayed or complicated application and implementation processes for farmer, the SWEEP program has always required that administrative processes be completed before a project can begin. CDFA does not anticipate any significant increase in the delay associated with when a farmer or rancher initiates an application, is selected for funding, and then may begin the project. Since block grant organizations will have fewer on-farm projects to execute the agreement process may be improved.
12/15/2022	Michael Burney/Val Fishman, Common Good Water, LLC	The commenter requests that eligible organizations for the block grant pilot include private entities, stating that private industries have a lot of experience in managing and implementing water management programs in the agricultural sector.	To align with the objective of the block grant pilot to support capacity building at regional technical assistance-oriented organizations, CDFA will limit the eligibility so that for-profit and/or private organizations are not eligible to be block grant recipients. If the block grant program continues in future years, CDFA will consider expanding eligibility.
12/15/2022	Kahn, Soares & Conway,	The commenter requests that eligible organizations for the block grant pilot	California Agricultural Commissions will be eligible to apply for SWEEP Block Grant funding.

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	California Strawberry Commission, California Apple Commission, California Wheat Commission, California Rice Commission, California Avocado Commission, California Walnut Commission, California Blueberry Commission, Olive Growers Council of California	include the California Agricultural Commissions. The commenter argues that the commissions are engaged in climate adaptation and mitigation work. Commissions have a lot of the same goals as the State and can help to achieve carbon neutrality by 2045.	
12/15/2022	Marco Rinaldi	The commenter expressed disappointment in the decision to change the program to a block grant style program and indicates that it will not benefit California growers or the mission of sustainability.	The SWEEP Block Grant Pilot is proposed as a pilot program. Through the block grant framework CDFA would like to continue to build regional expertise to better service the diverse agricultural regions in California. Additionally, the use of a block grant framework can help CDFA to distribute some administrative costs to third-party organizations; this is necessary for CDFA due to the historic high appropriation of funding resulting in a labor- intensive grant management portfolio, the tight timelines to encumber and liquidate funds and the 5% cap on CDFA's own administrative budget. CDFA is planning a traditional round of SWEEP and funding will be made available for growers directly from CDFA.
12/15/2022	Kris Tomlinson, Tomlinson Ag Consulting	The commenter does not approve of the block grant program, claiming that it will increase the complexity of the program and slow the process of implementing projects by introducing the eligible organizations as	The SWEEP Block Grant Pilot is proposed as a pilot program. Through the block grant framework CDFA would like to continue to build regional expertise to better service the diverse agricultural regions in California. Additionally, the use of a block grant framework can help CDFA to distribute some administrative costs to third-party organizations; this is necessary for

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		an intermediary between CDFA and the grower. The commenter expresses concern that there are not enough eligible organizations that are available to act as block grant recipients and is concerned the block grant program will reduce the	CDFA due to the historic high appropriation of funding resulting in a labor- intensive grant management portfolio, the tight timelines to encumber and liquidate funds and the 5% cap on CDFA's own administrative budget. CDFA is planning a traditional round of SWEEP and funding will be made available for growers directly from CDFA.
		available funds for growers.	Leading up to the SWEEP block grant solicitation, CDFA will host workshops to help applicants and other stakeholders understand the program framework and how to engage.
			Regarding the concerns of delayed or complicated application and implementation processes for farmer, the SWEEP program has always required that administrative processes be completed before a project can begin. CDFA does not anticipate any significant increase in the delay associated with when a farmer or rancher initiates an application, is selected for funding, and then may begin the project. Since block grant organizations will have fewer on-farm projects to execute the agreement process may be improved.
12/15/2022	Steve Etchegaray	The commenter expresses concern that the block grant program will decrease the available funds for growers that have been historically oversubscribed. The commenter indicates concern that the application and implementation processes will become more complicated, resulting in project delays.	The SWEEP Block Grant Pilot is proposed as a pilot program. Through the block grant framework CDFA would like to continue to build regional expertise to better service the diverse agricultural regions in California. Additionally, the use of a block grant framework can help CDFA to distribute some administrative costs to third-party organizations; this is necessary for CDFA due to the historic high appropriation of funding resulting in a labor- intensive grant management portfolio, the tight timelines to encumber and liquidate funds and the 5% cap on CDFA's own administrative budget. CDFA is planning a traditional round of SWEEP and funding will be made available for growers directly from CDFA.
			Leading up to the SWEEP block grant solicitation, CDFA will host workshops to help applicants and other stakeholders understand the program framework and how to engage.

Date

**Summary of Comment** Submitter **CDFA Response** Received Regarding the concerns of delayed or complicated application and implementation processes for farmer, the SWEEP program has always required that administrative processes be completed before a project can begin. CDFA does not anticipate any significant increase in the delay associated with when a farmer or rancher initiates an application, is selected for funding, and then may begin the project. Since block grant organizations will have fewer on-farm projects to execute the agreement process may be improved. 1. CDFA will continue to act upon the recommendations provided by the The commenter expresses support for the block grant program, saying that it is an EFA SAP Sub-Advisory committee. The block grant pilot is an attempt to opportunity to unlock innovation by better address regional needs for the SWEEP program. allowing on-ground partners to tailor the SWEEP program to a region's and ag 2. CDFA must balance administrative costs associated with managing the community's unique challenges and block grant program and the need to effectively distribute the historically opportunities. The practices used to achieve high appropriation from the 2022 state budget. For this reason, CDFA must program goals look different throughout propose a minimum award that is high enough to significantly reduce the many regions of the state. The comment workload in executing and managing grants. Additionally, an award of Brian Shobe, letter offered the following \$750,000 may not offer sufficient administrative funds to effectively CalCAN; Laurel recommendations for changes to the RGA: administer the award. Marcus, California 12/15/2022 Land Stewardship 1. Unlock regional innovation by improving 3. The proposal to dedicate 5% of the funds for technical assistance is Institute; Sacha program flexibility. The commenter suggests aligned with AB 2377 (2018) legislative requirements which requires CDFA to Lozano, Santa Cruz updating the RGA in several ways to create allocate 5% to technical assistance while also restricting technical RCD assistance funding to no more than \$5 million of an appropriation. CDFA a more regional approach and to implement the recommendations made by must also ensure that enough funding from the SWEEP appropriation is available to also support the SWEEP technical assistance through the the SWEEP sub-advisory group from 2021. They suggest allowing regional flexibility to Climate Smart Agriculture Technical Assistance Program consider the priorities of groundwater 4. CDFA will provide information regarding block grant recipient services to sustainability agencies, regional impacts related to quantification of water and farmers and ranchers, including service area and other relevant information. Block grant recipients will be required to provide this information to CDFA in GHGs, and allow organizations to leverage a timely manner and on a regular basis for CDFA to post on its website or multiple funding sources.

Summary of Public Comments on SWEEP Block Grant Pilot Draft Request for Grant Applications

Date Received	Submitter	Summary of Comment	CDFA Response
		2. Lower the minimum block grant award to \$750,000 to provide further flexibility to	distribute via email lists. CDFA will make this clear in the final draft of the Block Grant Pilot Program RGA.
		match actual local/regional demand, particularly as some block grant applicants may have relatively smaller service areas and/or prioritize working with smaller-scale operations with lower cost projects.	5. The technical review criteria will provide substantial opportunity for program applicants to identify the specific bilingual services needed by the community and to explain how they plan to meet that need. CDFA will strongly encourage bilingual services to be offered as part of outreach and technical assistance.
		3. Ensure adequate technical assistance by giving block grant recipients the flexibility to adjust their technical assistance to administrative cost ratio based on actual grower needs. Recommend that CDFA allow block grant awardees to use 5-20% of the award for administration and 5-15% for technical assistance, for a combined total of no more than 25%, reserving 75% of the	
		<ul> <li>grant for on-farm project implementation.</li> <li>4. List all open applications and provide a map of relevant service areas of block grant recipients. The commenter recommends that CDFA list all open applications, links to application portals, and deadlines on the SWEEP website, along with a map of relevant service areas that block grant recipients are serving.</li> </ul>	
		5. Ensure all eligible growers have the opportunity to apply for SWEEP by strengthening outreach criteria and building in oversight of on-farm project selection	

Date Received	Submitter	Summary of Comment	CDFA Response
		criteria. The commenter recommends requiring outreach in languages other than English for recipients operating in areas where at least 5% of the growers in that area use a primary language other than English. 1. The commenter argues that by having	
12/15/2022	Katie Little, California Farm Bureau	<ul> <li>farmers and ranchers apply for SWEEP</li> <li>grants directly, the direct and indirect costs that would be incurred by a third-party would be eliminated. The commenter indicates that a third-party provider could incur three times the administrative costs of the state and that would be a detriment to the program. The commenter argues that the administrative costs could instead be applied to climate smart practices.</li> <li>2. The commenter has concerns about the language surrounding Socially Disadvantaged Farmer and Rancher (SDFR) prioritization and asks what would happen if block grant recipients were unable to dedicate 25% of funding to benefit SDFRs. The commenter expresses support for prioritization of SDFRs but concerned about setting a requirement for each block grant recipient and instead recommends that the program as whole should aim to reach this target. The commenter also has concerns over the language regarding farm size prioritization; stating that acreage alone does not define a small farm. The</li> </ul>	<ul> <li>1. The amount of funding that CDFA can access to administer the SWEEP program is limited in amount and timeframe and is not expected to cover all the administrative costs from such a large appropriation of funds to SWEEP. For these reasons, CDFA must develop a program that can help to distribute administrative tasks to third parties over the course of a grant term.</li> <li>2. AB 2377 (2018) directs CDFA to prioritize assistance to SDFR and farms smaller than 500 acres. The Office of Environmental Farming and Innovation will work within the bounds established by AB 2377 for technical assistance priorities and will follow the guidance of CDFA's Farm Equity Office in establishing targets for funding to SDFRs. AB 2377 indicates that CDFA must ensure that 25% of technical assistance providers prioritize their assistance to farms and ranchers of 500 acres or less.</li> <li>The program level goal will be to achieve the 25% targeted funding to SDFRs. The block grant application will provide an opportunity for organizations to make a commitment to this 25% target or to provide justification of why 25% is not achievable because of the SDFR populations in their target geography. In the latter case, applicants must estimate the percent of grant funding they will commit to serve SDFRs and outline ways to achieve that target. Applicants will be scored on their ability to set and justify an ambitious SDFR target based on their target geography's SDFR</li> </ul>

Date Received	Submitter	Summary of Comment	CDFA Response
		commenter discourages the program from using acreage to define small farmers.	
12/15/2022	Mitchell Gander	The commenter expresses concern that a block grant program will reduce the available funds for growers in a historically oversubscribed program.	The SWEEP Block Grant Pilot is proposed as a pilot program. Through the block grant framework CDFA would like to continue to build regional expertise to better service the diverse agricultural regions in California. Additionally, the use of a block grant framework can help CDFA to distribute some administrative costs to third-party organizations; this is necessary for CDFA due to the historic high appropriation of funding resulting in a labor- intensive grant management portfolio, the tight timelines to encumber and liquidate funds and the 5% cap on CDFA's own administrative budget. CDFA is planning a traditional round of SWEEP and funding will be made available for growers directly from CDFA.
12/15/2022	Steve Hettinga	The commenter would like to see funds available in response to the water restrictions imposed due to the drought.	CDFA received a \$110 M appropriation of funding through the fiscal year 2022-2023 state budget. This is one-time funding. To disburse a portion of these funds to farmers CDFA expects to hold a traditional solicitation for SWEEP following the upcoming block grant solicitation.
		The commenter makes the following recommendations: 1. CDFA should hire additional staff to address the issues pertaining to grant	1. Funding to the SWEEP program has been provided through one-time appropriations. This results in significant challenges in hiring as future funding is unknown.
12/15/2022	Arohi Sharma, Natural Resource Defense Council (NRDC)	<ul> <li>administration workload.</li> <li>2. To participate in the block grant program CDFA should require irrigation districts to be 100% compliant with mandatory water use reporting requirements.</li> <li>3. Work with block grant recipients to study and quantify rebound effects from SWEEP funds to provide the Legislature and Administration with more accurate</li> </ul>	<ul> <li>2. CDFA will provide an opportunity the Department of Water Resources to review funding recommendations and raise concerns before projects are selected for award.</li> <li>3. CDFA has supported projects by universities and third parties to understand project outcomes of SWEEP and other climate smart agriculture programs. SWEEP collects post project data after the projects are implemented to strengthen accountability of SWEEP award recipients. The appropriation of funding to SWEEP has not been identified by the Legislature as research funding.</li> </ul>
		estimates of the program's emission and	4. CDFA will develop metrics and a procedure for receiving report data from

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		water impacts and cost effectiveness. 4. Require consistent, verified, and centralized programmatic data collection, reporting and accounting and make data	<ul> <li>block grant recipients. Status of block grant projects and on-farm projects will be made available on CDFA's website while balancing the need to protect farmers' and ranchers' information.</li> <li>5. CDFA has a Healthy Soils Program that incentivizes growers to improve soil</li> </ul>
		5. Maximize environmental benefits by prioritizing grants that address both soil health and water use efficiency.	health. SWEEP's objectives are water conservation and water and energy use efficiency. These programs are complementary but have specific objectives that have been created by the Legislature.
12/15/2022	Carlee Branco, CALGAP	The commenter is concerned that the block grant program reduces funds available for growers in a historically oversubscribed program and indicates that the block grant program will complicate the implementation process, forcing growers to delay projects and practices.	<ul> <li>The SWEEP Block Grant Pilot is proposed as a pilot program. Through the block grant framework CDFA would like to continue to build regional expertise to better service the diverse agricultural regions in California.</li> <li>Additionally, the use of a block grant framework can help CDFA to distribute some administrative costs to third-party organizations; this is necessary for CDFA due to the historic high appropriation of funding resulting in a labor-intensive grant management portfolio, the tight timelines to encumber and liquidate funds and the 5% cap on CDFA's own administrative budget. CDFA is planning a traditional round of SWEEP and funding will be made available for growers directly from CDFA.</li> <li>Leading up to the SWEEP block grant solicitation, CDFA will host workshops to help applicants and other stakeholders understand the program framework and how to engage.</li> <li>Regarding the concerns of delayed or complicated application and implementation processes for farmer, the SWEEP program has always required that administrative processes be completed before a project can begin. CDFA does not anticipate any significant increase in the delay associated with when a farmer or rancher initiates an application, is selected for funding, and then may begin the project. Since block grant organizations will have fewer on-farm projects to execute the agreement process may be improved.</li> </ul>

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		<ul> <li>The commenter indicated the following concerns and suggestions. Suggestions are listed below each concern.</li> <li>1. Concerned with equitable distribution of funding to growers across California and consistent delivery of quality programming statewide.</li> <li>1.1. Standardize and centralize procedures to maintain equity, prevent conflicts of the state of</li></ul>	<ul> <li>1.1. The Request for Grant Applications will establish a framework for multiple aspects of the program including requirements for provision of technical assistance and reporting procedures. These requirements and procedures will apply to all participants of the program. Applicants of the block grant program will provide information on their plan for selection of projects in their service area and actions that will prevent conflicts of interest or inequitable access. One intent of the block grant framework is to allow increased flexibility for block grant recipients to determine how to serve the farmers in their service area.</li> <li>1.2. SWEEP will be flexible and customizable by growers.</li> </ul>
12/15/2022	Glenda Humiston, University of California Division of Agriculture and Natural Resources	<ul> <li>interest, promote transparency and accountability, and provide farmer applicants with clear information and an efficient application process.</li> <li>1.2. Allow for different payment rates based on region and practice type to cover implementation costs.</li> </ul>	1.3. Through the reporting procedures outlined in the Request for Grant Applications, CDFA will stay in frequent contact with awarded organizations. CDFA will utilize a process of critical project review when awarded organizations may not be meeting performance expectations. CDFA may also perform a critical project review randomly to gather information on program outcomes generally. Organizations are also subject to state auditing procedures for three years following project completion.
		<ol> <li>1.3. CDFA should conduct periodic audits of block grant organizations and establish procedures to resolve issues that may arise in the administration of block grant funds.</li> <li>There is a potential for lack of uniformity for application submission, reviews, and selection of projects for award.</li> </ol>	<ul> <li>2.1. One intent of the block grant format is to allow flexibility for regional considerations in the delivery of SWEEP funding. Applicants will propose their plan for the selection of projects in the application for evaluation during technical review for both feasibility and addressing the equity priorities.</li> <li>CDFA has established criteria for all SWEEP projects including water savings and GHG emission reductions. CDFA also has outlined priorities related to equity concerns in both the delivery of technical assistance and the distribution of funding to farmers and ranchers.</li> </ul>
		2.1. Establish and require use of standard criteria for review and funding of applications (disallow each block grant recipient organization from creating its own	2.2. CDFA will host information on the block grant projects on a central website. Awarded organizations will be responsible for a robust outreach campaign within their service area. Due to the technological challenges and coordination, administrative constraints and to allow flexibility, CDFA will

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		requirements) with all organizations	not be able to host a standard application although all on-farm projects will
		following a competitive process with a	be required to meet requirements outlined in the RGA.
		deadline rather than a first-come, first-	
		served process.	2.3. CDFA will update the RGA to include these restrictions. A block grant
			recipient will be prohibited from requiring a farmer or rancher to provide
		2.2. Create and maintain a centralized	information, photos, interviews or other activities that are not a necessary
		website, standardized application portal, question and answer document, and	part of project implementation, reporting, or project completion. Block grant recipients will be permitted to request farmers to participate in these
		notification system with clear CDFA HSP and	activities optionally.
		SWEEP branding for the benefit of growers	denvines ophonally.
		and block grant recipients.	2.4. The awarded organization will be performing robust outreach and will
			invest significant time into the planning of projects before advancing the
		2.3. Establish clear guidelines and	projects for funding. For these reasons, CDFA intends for applicants to the
		requirements for block grant recipient	block grant program to develop a plan for selection of projects. If an
		organizations that prohibit the organization	organization proposes a competitive process, they will outline the criteria for
		from requiring any information, photos,	competition. This plan will be reviewed considering equity concerns and
		interviews, or participation in any activity	feasibility during the block grant award process.
		from applicants that is not in accordance	
		with or necessary for CDFA's requirements	2.5. CDFA will ensure that participating farmers have access to contact
		for SWEEP.	information at CDFA to share their experience with the block grant program.
		2.4. Require block grant recipients to run a	A webform is a useful suggestion for gathering positive and negative feedback.
		competitive grant application process	IEEddack.
		where block grant recipients (TAPs and	2.6. The block grant applicant organization will propose the concept for an
		others) work with growers to revise project	equitable and transparent selection process. CDFA will encourage the use
		applications, in lieu of first come, first serve	of a third-party review in the request for grant applications. The proposed
		model. The application process is more	plan for project selection will be part of the project review criteria.
		equitable to small and disadvantaged	
		farmers who need more assistance to	3.1. To support the flexibility that is the intent of this block grant framework,
		complete the application.	each block grant recipient will propose their project selection process as
			part of their grant application. This will include the process for farmers to
		2.5. Maintain an email address, phone	enroll and the timeline. Block grant recipients will communicate with CDFA
		number, and/or web form so that farmer	in advance of a solicitation period to facilitate CDFA 's post on its website. A

Date Received	Submitter	Summary of Comment	CDFA Response
		applicants can directly report any problems or issues in their experience with block grant recipient organizations.	farmer may only receive funding one time for any proposed project. Block grant recipients will provide CDFA a list of selected projects to ensure that no project receives duplicate support from more than one block grant organization.
		2.6. Use an unbiased third-party review panel for grower project applications with reviewers located in different geographic regions than the block grant recipient to reduce conflicts of interest by reviewers.	4.1. CDFA will use existing procedures to work with grant recipients to support project modification requests. Extensions may not be possible due to liquidation deadline for the SWEEP appropriation.
		3. Concerned with the variability of grantee organizations to reach under-represented farmers and ranchers due to the complexity of application and implementation process.	4.2. SWEEP has a level of flexibility that has been popular amongst the farming community; SWEEP does not have an approved list of eligible practices to achieve the goals of water savings and GHG emission reductions associated with on farm pumping. This allows growers to include the technologies and practices most appropriate for their goals and location.
		3.1. Coordinate and publicize the block grant recipients' application periods for farmers and establish protocols for farmers participating with multiple block grant recipients.	4.3. Project verification is a critical element of accountability. CDFA is responsible for ensuring that funds are used as agreed upon. For this reason, SWEEP project verifications will continue to include documentation of all the major SWEEP project components.
		4. The burden is placed on growers and existing technical assistance providers in navigating and applying to new SWEEP programs across state.	4.4. SWEEP has historically allowed for scope of work revisions and line-item shifts with appropriate justification. CDFA will work with block grant recipients to ensure project implementation offers flexibility to the extent possible.
		4.1. Allow flexibility for block grant recipients to extend and revise projects beyond their initial deadline.	5.1. CDFA is required to dedicate 5% of any appropriation of SWEEP to technical assistance grants. This requirement will continue and applies to the block grant framework and any future solicitation of SWEEP.
		4.2. Reduce the number of practices eligible for funding.	5.2. CDFA currently posts a list of technical assistance providers on the program websites and links to UC ANR's website for Climate Smart Agriculture Community Education Specialists.

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		<ul> <li>4.3. Streamline project implementation and verification for SWEEP to key critical control components (flowmeter, soil moisture sensor, data to show water savings).</li> </ul>	6.1. The qualifications of an organizations, including their experience with grant management, will be assessed as part of the technical review process for the SWEEP block grant pilot. CDFA will be providing training to awarded block grant recipients so that they can administer the implemented projects.
		4.4. Allow flexibility to contracts once approved to reduce contractual burden.	
		5. Concerned with the loss of grower relationships with established technical assistance providers.	
		5.1. Continue supporting existing technical assistance providers and provide updated training for new providers to ensure continuity in service to farmers.	
		5.2. Maintain a central list of technical assistance providers and circulate these regularly so applicants are reassured their provider is trained.	
		6. Concerned the block grant program transfers administrative burden to partner organizations and may result in inefficiencies in implementing projects.	
		6.1. Use fewer entities with a strong track record for efficient grant management to reduce oversight burden on CDFA and help ensure consistency across regions.	