From:	CDFA OEFI@CDFA
To:	CDFA SWEEP Tech@CDFA
Subject:	FW: CDFA Accepting Comments on Draft Recommendations for State Water Efficiency and Enhancement Program (SWEEP)
Date:	Tuesday, May 18, 2021 9:03:16 AM

From: JS Pomeroy, Jr. <oaklandfarmer@gmail.com>
Sent: Monday, May 17, 2021 3:42 PM
To: CDFA OEFI@CDFA <CDFA.OEFI@cdfa.ca.gov>
Subject: Re: CDFA Accepting Comments on Draft Recommendations for State Water Efficiency and Enhancement Program (SWEEP)

*Mandate living soil! Biologically rich soil minimizes need to irrigate and prevents erosion/runoff.
*Tillage should be closely monitored.
*Incentivize compost tea/ fermented plant juice applications, including through the use of crop dusters.

From: CDFA OEFI@CDFA
To: CDFA SWEEP Tech@CDFA
Subject: FW: Water conservation and ground water management
Date: Tuesday, May 18, 2021 9:03:38 AM

From: devin jarvis <devin.jarvis@hotmail.com>
Sent: Monday, May 17, 2021 4:07 PM
To: CDFA OEFI@CDFA <CDFA.OEFI@cdfa.ca.gov>
Subject: Water conservation and ground water management

Hello,
I have given this matter some thought and I have a few suggestions. 1st I think we should encourage all farming operations to adopt subsurface textile irrigation. This is a relatively new area but should be easily transitioned from existing irrigation systems and will use less water and minimize evaporation by putting the water where the crops actually need it. 2nd I think we should set up some water desalination plants on the coast and power them with solar or other green energy. We can then pipe the water into the existing groundwater system continuously replenishing it and creating sea salt with can be sold at a small profit. I believe this will help all the projected goals of the SWEEP program and insure sustainable agriculture and water for all of California for beyond the foreseeable future.

Best of luck and I hope you give my proposals some thought.

Sincerely,
Devin M. Jarvis
Devin.jarvis@hotmail.com
Winning Together Home Solutions

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

KALIN FARMS

P.O. Box 1234
Brawley, Ca

May 28, 2021

To whom it may concern:

Re: SWEEP GRANT rules and restrictions/ support the recommendations made by SWEEP's Ad Hoc Advisory Group

My first application for a SWEEP Grant was in 2015. I had never applied for a grant of any kind and was relying upon assistance from a vendor who had been very successful for many of their customers the previous year. Unfortunately as is the norm with grants, each year requires more information and more restrictions, I was not successful. To be fair, the person who was assisting had never filled out a grant and made several errors which resulted in my grant request being denied.

The following year I applied a second time and also contacted Connie Valenzuela, our Ag Commissioner and asked her for some assistance. In the 2016 Grant the crop year was defined by a spring planting and a fall harvest. Unfortunately, here in the Imperial Valley our seasons are reversed and we plant in the fall and harvest in the spring and therefore the application could not be successful.

The third year I was hesitant to apply, because once again, the grant was written for permanent crops such as grapes and almonds that will be grown for 10 years or more. Here in the Imperial Valley most of our crops are rotated from field to field every couple of years so permanent conservation may not be possible.

I believe that this third year was when the Department set up a workshop here in the valley. Once again, moving conservation practices from one field to another seemed to be the stumbling block and 10 to 15 year monitoring was nothing more than a requirement that would make me noncompliant.

The main challenge of the SWEEP program in the desert is meeting the GHG criteria. The electrical infrastructure here in our valley is limited and the opportunities to be able to tie into the grid are very limited. Therefore, it is problematic to change from diesel to electric equipment. In addition, the Imperial Irrigation District is the largest gravity fed irrigation system in the world. Virtually none of our ground water is potable and highly saline and so there are no pumps to replace.

Until the CDFA and CARB accept the fact that the Imperial Valley farms in a completely different manner that the rest of California we will continue to be denied little if any success with this grant program.

I'm very sure that we are the most underserved county in California and unfortunately it looks to me at least as though that's where we will remain.

Recently the SWEEP's Ad Hoc Advisory Group developed recommendations that may address the issue discussed above. I think creating a separate water-only project category to the program may remove the main regional barrier for the low desert.

Sincerely,

Carson T. Kalin

Kalin Farms

Environmental Farming Act Science Advisory Panel
California Department of Food and Agriculture
1220 N Street
Sacramento, CA 95814

June 15, 2021

Re: **Comments on the SWEEP Ad Hoc Advisory Group Report**

Chair Dlott and Distinguished Panel Members:

I write on behalf of the California Climate and Agriculture Network (CalCAN).[1] Since its creation in 2014, CalCAN has advocated for funding the State Water Efficiency and Enhancement Program (SWEEP) and has simultaneously tracked its progress in two reports in 2016[2] and 2018[3]. The current drought has again laid bare the vulnerability of California farmers to the vicissitudes of a changing climate and the critical importance of SWEEP for its resilience, economic, and ecological benefits.

Thank you again for heeding the call from stakeholders of just over a year ago to convene an ad hoc advisory group to review and recommend updates to SWEEP, which remains the state's *only* on-farm water efficiency program.

I had the privilege of learning and serving alongside 40 other members of the advisory group, whose range of expertise, backgrounds, and geographies made for insightful and grounded discussions. It is no easy feat for such a large group of diverse stakeholders to develop, refine, and achieve near-consensus on dozens of recommendations[4] in the course of a few meetings. But that is exactly what the advisory group accomplished thanks to the skillful support from CDFA staff and the CSU team, who deserve high marks for their preparation and facilitation throughout.

Prioritizing Recommendations for Implementation

The Science Advisory Panel now has the task of prioritizing the advisory group's recommendations and converting them into time-bound directives for CDFA to implement.

[1] CalCAN is a statewide coalition of farmers and ranchers, ag professionals, scientists, allied organizations and advocates that advances policy to realize the powerful climate solutions offered by sustainable and organic agriculture.
[2] California's State Water Efficiency and Enhancement Program: A Progress Report. Available at: calclimateag.org/wp-content/uploads/2018/10/SWEEP-Report-Rounds-1-4-combined-2016.pdf
[3] Climate Smart: Saving Water and Energy on California Farms. Available at: calclimateag.org/wp-content/uploads/2018/09/SWEEP-Policy-Brief-CalCAN-9-11-18.pdf
[4] Approximately two-thirds of the advisory group's recommendations received 80% or higher "total" support (combining "strong," "moderate," and "weak" support) in our final vote. Only ten of the group's 48 recommendations received more than 10% opposition.

Thankfully, the advisory group's ranking of the recommendations already provides one easy way to prioritize them for implementation.

We suggest the Panel further prioritize the recommendations by identifying which of the recommendations can be implemented in the next round of SWEEP and which ones may require more time or coordination with experts or other agencies to be fully implemented (e.g. clarifying SWEEP's goals and role in state-level water resilience planning).

Based on our analysis of the recommendations and experience tracking the implementation of multiple state programs, we suggest the top recommendations listed in response to Question 2 ("How might SWEEP improve participation by agricultural operations that have historically faced barriers in accessing or utilizing the program?") are those most likely to be implementable as part of the next SWEEP funding cycle. These recommendations include:

- Ease Language barriers: "CDFA should provide outreach, educational materials and, to the degree possible, the application in multiple languages, prioritizing Spanish. Additionally, technical assistance in various languages should also be provided and prioritized."

- Increase Opportunities for Surface Water Users: "CDFA should allow for water supply to have the inclusion of a storage and compensation reservoir so that the farmer can capture the water on the intervals that water is delivered or diverted…" and "CDFA should divide funding into two categories: 'Water-focused' or 'Water-and GHG-focused' potentially setting aside specific funding amount for each category of project."[5]

- Additional Considerations for Prioritizing Applicants for Award: "CDFA should give some priority to lower income brackets."

- Streamline Application Process: "CDFA should Increase the pre-application outreach period to six months and the application window to 90 days to accommodate farmers' harvest and work schedules. CDFA should hold the application period in early winter when most farmers are not in harvest or planting season, but ensure it is long enough so that technical assistance providers are not impacted during holiday season."

- Distribution of Grant Funds: "CDFA should allow farmers to apply for 25% advance payment more than once, so that they can request an additional payment after they have used up their first 25%."

Implementing these recommendations would meaningfully build on the program's progress in equitably distributing its limited funds to farmers who are least likely to have the capital to upgrade their irrigation systems on their own and to regions of the state that have been historically excluded from the program.

[5] This recommendation was listed under the theme of "Program Buckets," but was largely discussed in the advisory group as a way to increase opportunities for surface water users to participate in the program, including those in regions of the state (e.g. the desert region) who have historically faced significant barriers in accessing the program.

By highlighting the recommendations above as ones that may be easiest to implement this year, we do not want to diminish the importance of other recommendations in the advisory group's report. Some recommendations, like those to make the program more flexible and responsive to rapidly-evolving irrigation technologies, are important to the program's long-term success, but will likely involve additional consultation with experts and technical changes to the program. A number of the advisory group members are willing and well positioned to assist CDFA in actualizing these recommendations. After all, many of them have been contributing to SWEEP for years as reviewers or technical assistance providers and are eager to see these recommendations adopted.

If the legislature agrees in the weeks ahead to the Governor's proposed $100 million for SWEEP, it would be the single largest allocation to the program since its creation – a welcome change after two years without program funding and as farmers reckon with a return to severe drought conditions and uncertainty. The advisory group's recommendations offer a timely set of strategies to further increase the impact and equitable distribution of SWEEP funds.

Thank you again for convening this advisory group. And thank you in advance for your work to turn the body of on-the-ground knowledge, experience, and feedback the advisory group's report represents into meaningful and timely improvements to this pivotal program.

Sincerely,

Brian Shobe
Associate Policy Director
brian@calclimateag.org

CALIFORNIA WALNUT COMMISSION
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An Equal Opportunity Employer and Provider

June 15, 2021

California Department of Food and Agriculture - CDFA
Office of Environmental Farming & Innovation
1220 N St., Sacramento, CA 95814

RE: State Water Efficiency and Enhancement Program (SWEEP) Formal Comments

Dear Office of Environmental Farming & Innovation:

The California Walnut Commission (CWC) welcomes the opportunity to comment on the draft recommendations of the ad hoc advisory group on the state water efficient and enhancement program (SWEEP) and the program as a whole. The CWC represents the California walnut industry, comprised of nearly 4,500 family farms that generate over 85,000 jobs directly and indirectly, and over $1.29 billion in farm gate product value. Walnuts are California's ninth largest agricultural commodity and 99% of English walnuts grown in the United States are produced in California.

The CWC is anticipative our responses to the questions below will help provide a targeted framework with the purpose of best enabling direction and management of future projects, further ensuring a positive impact on how the program can be of best value to walnut growers across the state.

Walnut industry responses to the questions are as follows:

1. **Considering SWEEP's ability to help farmers improve water use efficiency, what is working well? What might SWEEP seek to improve? How might SWEEP evolve to help farmers address new resource management challenges?**

The CWC believes SWEEP is doing a decent job, being flexible with the type of project CDFA is willing to fund. Also, with SWEEP funding 835 projects covering 137,000 acres, that is a good start, but believe there is an even greater impact opportunity for growers across the state. The CWC would like to see the statistics associated with the funding to include the following: what type of farm, operation size, crop type, and measurable progress. This could be provided to all participating farms and to the public to encourage contribution to the water efficiency infrastructure.

One of the largest challenges that growers will have in the future is the Sustainable Ground Water Management Act (SGMA). This will continue to force farmers to use expensive technology to implement sustainable water practices, increase frequencies of already current rigorous regulatory requirements and put an additional burden on growers already operating within some of the most stringent regulatory requirements in the world. A lot of farmers will not have the resources or the

financials to make the required improvements without practical solutions and funding support. For example, using technology to the farm and environment's benefit is essential for all growers in the state of California; however, converting to a more efficient irrigation technology such as a sprinkler, drip or a fan jet system is costly and can range from $1200 to $1500 an acre or more. This will leave some growers with no options other than to increase debt, or sell the farm. Continued availability of funding from SWEEP grants and additional incentive based programs will help farmers with the implementation of the new technologies and continue to efficiently improve water use throughout the state.

2. **How might SWEEP improve participation by agricultural operations that have historically faced barriers in accessing or utilizing the program?**

The CWC believes one of the biggest barriers to growers using the program is awareness, and also the apathy of dealing with government paperwork. The 'average grower' needs better assistance and direction to know what to do to actually take advantage of the program. A suggestion to improve involvement is greater transparency through electronic communication, webinars, interactive workshops, learning sessions and a more open forum for discussion and communication across the agriculture community.

Inclusivity and equitability across all farm sizes throughout the state is another critical component. Smaller farmers may not have access to the resources needed to execute the simplest measures of water efficiency. For example, test pumping costs at least $4000, per average pump; it is as much of a cost for 200 acres as it is for 40 acres. It is challenging to provide test pump information with the upfront cost of a test pump. Assistance with the initial amount, or approval for funding for test pumping would be a good starting point for the smaller farmers.

In addition, it can be intimidating to analyze costs and create a budget for the SWEEP project application process. It would be helpful to have an example available to demonstrate to farmers how to categorize their submission. It is written out in the spreadsheet for the application; however, having another tab with an example shown would be very helpful. A more robust standard operating procedure or instruction document would help solve this problem.

3. **How might promotion and coordination of SWEEP be improved with irrigation districts, groundwater sustainability agencies, and the US Department of Agriculture's Natural Resources Conservation Service (NRCS) and other potential partners?**

Having SWEEP as a resource for funding will be crucial to enable farmers to achieve the limits that will be imposed by the irrigation districts. Without SWEEP it will be much more difficult for farmers to make the necessary improvements that are needed to utilize water efficiency in order to help comply with pump restrictions that these agencies are mandated to enforce.

Capital improvements such as the utilization of soil moisture probes and variable frequency drives are examples of low-cost methodology to monitor and control irrigation. In addition, soil mapping, pump retrofits, switching to low pressure irrigation systems and aerial imagery also enable farmers to conserve water and energy to sustain stable ground water management.

Further, from an infrastructure standpoint, if dams are not going to continually be built or increased in size, alternatives for creating more surface storage ground water recharge needs to be improved and optimized. Enhancing engineered and designed systems with the intent of better controlling

irrigation and taking from the above efficiency suggestions will help enable more climate positive, efficient, effective and sustainable systems and solutions for the agricultural industry.

The CWC greatly appreciates the opportunity to comment on this important matter impacting the walnut industry.

Sincerely,

Joshua Rahm

Joshua Rahm
Director, Technical & Regulatory Affairs
California Walnut Commission
jrahm@walnuts.org

June 14, 2021

CDFA Environmental Farming Act (EFA) Science Advisory Panel (SAP)
1220 N Street
Sacramento, California 95814

To Whom It May Concern:

Thank you for the opportunity to provide input regarding recommended changes to the State Water Efficiency and Enhancement Program (SWEEP). For the last five years, Imperial Valley Water (IVH2O) has worked with local growers in the Imperial Valley to develop and submit SWEEP grant applications.

The Imperial Valley is a gravity-irrigated farming region in the southeast corner of California. With limited use of fuel-powered pumps and limited electrical options, many growers found it difficult to comply with SWEEP program greenhouse gas emission criteria. The region's gravity fed irrigation system requires very little pumping and virtually no ground water pumps. Another challenge is a limited electrical infrastructure which restricts opportunities to tie-in to the electrical grid and convert from diesel to electric equipment.

We understand the program was designed to promote both water and energy conservation. However, standards for both water and energy conservation have resulted in regional disparities in the program. Practices, solutions and outcomes are drastically different by agricultural production systems. Proposed water conservation projects in desert production regions can realize significantly higher water conservation results than projects in other regions which indicate greater energy savings. Regional differences in agricultural production systems should be recognized and implemented in future SWEEP allocations or growers in desert regions will continue to be excluded.

IVH2O supports the Ad Hoc Advisory Group's recommendation to divide funding into two project categories, "Water-focused" and "Water and Energy-focused" projects, setting aside specific funding opportunities for each category. Adoption of this recommendation would help eliminate the regional barrier for the low desert to participate in future SWEEP opportunities.

Our region is clearly significantly underserved by this program. Growers will not successfully compete for SWEEP funding opportunities without changes to program criteria. Any modifications to SWEEP which takes into consideration the unique production conditions is much appreciated.

Sincerely,

Craig Elmore
Chairman

Imperial Valley Water (IVH2O)

1432 McCabe Cove Road
El Centro, CA 92243

916.690.3111
ccwatte@hotmail.com

501 (c) (5) Non Profit Organization

Imperial County Farm Bureau

1000 Broadway
El Centro, Ca 92243
Office (760) 352-3831
Fax (760) 352-2032
Info@icfb.net

June 16, 2021

CDFA Environmental Farming Act (EFA) Science Advisory Panel (SAP)
1220 N Street
Sacramento, California 95814

To Whom It May Concern:

The Imperial County Farm Bureau (ICFB) appreciates the opportunity to provide input on the proposed changes to CDFA's State Water Efficiency and Enhancement Program (SWEEP). We have consulted with the University of California Cooperative Extension staff who have worked with this program frequently and have a strong understanding of our growing practices as well as the local growers who have applied for SWEEP funds in the past. We feel that the intent of this program is great by incentivizing water savings and greenhouse gas reduction. However, as you are aware, there have been challenges with the program's requirements, limiting growers in the Imperial Valley.

The Imperial Valley uses surface irrigation that relies on the gravity flow of water and does not use electricity, thus, there is no energy use baseline for applicants converting from surface irrigation methods that require energy use. Another challenge is a limited electrical infrastructure which restricts opportunities to tie-in to the electrical grid and convert from diesel to electric equipment. Under these circumstances, it would be desirable to have separate project categories.

We understand the program was designed to promote both water and energy conservation. However, standards for both water and energy conservation have resulted in regional disparities in the program and we are concerned that the program will lose growers' interest in the low desert over time if this restriction is not addressed. Practices, solutions and outcomes are drastically different by agricultural production systems. Proposed water conservation projects in desert production regions can realize significantly higher water conservation results than projects in other regions which indicate greater energy savings. Regional differences in agricultural production systems should be recognized and implemented in future SWEEP allocations or growers in desert regions will continue to be excluded.

ICFB supports the Ad Hoc Advisory Group's recommendation to divide funding into two project categories, "water-focused" and "water-and-energy-focused", setting aside specific funding opportunities for each category. Adoption of this recommendation would help eliminate the regional barrier for our growers to participate in future SWEEP

opportunities. Our region is clearly significantly underserved by this program. Growers will not successfully compete for SWEEP funding opportunities without changes to program criteria. Any modifications to SWEEP which takes into consideration the unique production conditions is much appreciated.

Sincerely,

Rachel Magos
Executive Director

North San Joaquin Water Conservation District

PO Box E, Victor, CA 95253
498 East Kettleman Lane, Lodi, CA
209.368.2101 nsjgroundwater.org

June 16, 2021

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

RE: Comments on "Recommendations of the Ad hoc Advisory Group on the State Water Efficiency and Enhancement Program"

Dr. Amrith Gunasekara,

On behalf of the North San Joaquin Water Conservation District ("District"), I am pleased to submit comments on the "Recommendations of the Ad Hoc Advisory Group on the State Water Efficiency and Enhancement Program," which will define future SWEEP program guidelines.

The District has long encouraged growers to apply for funding to help increase energy and water efficiency in the critically overdrafted Eastern San Joaquin Groundwater Basin, but so far only a few growers have received SWEEP grants. The District is hopeful that implementation of the recommendations from the Ad Hoc Advisory Group will result in additional focus on critically overdrafted groundwater basins, a streamlined application process, and coordination with the implementation of the Sustainable Groundwater Management Act (SGMA). The recommendations relevant to the District are excerpted below with corresponding District comments.

Thank you for undertaking this important effort to seek feedback and improve the program. Please contact me at (209) 368-2101 or at nsjwcd@outlook.com with any questions.

Sincerely,

Joe Valente
President, North San Joaquin Water Conservation District

AD HOC ADVISORY GROUP RECOMMENDATIONS	PERCENTAGE SUPPORT[1]	DISTRICT COMMENT
Question 1: What might SWEEP seek to improve and how might SWEEP evolve to help farmers address new resource management challenges?		
CDFA should divide funding into two categories: "Water-focused" or "Water- and GHG-focused" potentially setting aside specific funding amount for each category of project (page 17)	92.3%	The District agrees with the Advisory Group analysis that allowing water-focused applications will encourage more surface water users to apply, therefore helping with SGMA implementation. It also will help address the issue of growers including energy efficiency elements in a project they might not otherwise include.
Instead of only one maximum request for SWEEP, CDFA should define two cost category scales for SWEEP projects including (1) small cost projects ($50,000 maximum request with simplified application), (2) medium cost projects and large cost projects ($50,000-$130,000 maximum request).The majority of funds would go to the medium bucket; however, the number of small projects and reach would far exceed that of larger projects. (page 23)	92.3%	The District supports the concept of two levels of application but suggests that the small application limit be increased to $75,000. Most growers in the District are small (40 acres or less) but any new surface water system, even for these small farms, will cost in excess of $200,000.
CDFA should divide funding into three program categories: GHG-first, Water-first, and Combined projects. Allow growers to apply for funds to cover "water-focused" or "GHG-focused" projects, potentially setting aside specific funding amount for each category of project. (page 23)	84.6%	The District supports either implementation of this recommendation or the one recommended above.
Question 2: How might SWEEP improve participation by agricultural operations that have historically faced barriers in accessing or utilizing the program?		
CDFA should allow for water supply to have the inclusion of a storage and compensation reservoir so that the farmer can capture the water on the intervals that water is delivered or diverted. CDFA should allow for the pressurization, filtration and the use of pressurized irrigation coming from the storage reservoir. This could result in optimization of water and energy usage. CDFA should allow for the utilization of GHG savings that was offset from one source as GHG credit that can be used for	84.6%	The District supports this recommendation. The District also notes that farmers should be allowed to create joint projects that are on different properties to improve overall efficiencies and reduce cost.

[1] "Percentage support" is the sum of the "strong support", "moderate support" and "weak support" categories in the "Recommendations of the Ad hoc Advisory Group on the State Water Efficiency and Enhancement Program".

a new GHG producing source such as a new pump that is used to pressurize the storage reservoir. (page 24)		
CDFA should Increase the pre-application outreach period to six months and the application window to 90 days to accommodate farmers' harvest and work schedules. CDFA should hold the application period in early winter when most farmers are not in harvest or planting season, but ensure it is long enough so that technical assistance providers are not impacted during holiday season. (page 25)	94.9%	The District strongly supports this recommendation because growers need additional time and assistance to apply for grants, as it is not usually part of their regular business operations. The District also supports organizing the application period around planting and harvest schedules.
CDFA should allow for individual farmers that are supplied pressurized water from an irrigation district a pathway to apply for the SWEEP program. CDFA should make sure that the farmers that are supplied with surface water delivery systems are allowed. (page 28)	87.2%	The District strongly supports this concept and would further suggest projects that enable a farmers to go from a groundwater only source, to a surface water or groundwater source should receive priority in overdrafted basins to help add system flexibility to implement SGMA.
During the application process, CDFA should give priority to small farmers beyond SDACs and SDFRs based upon a statement of need and survey response. Survey questions could include the following: 1) Acreage farmed, 2) Income range of farmer, 3) Number of employees, 4) Percentage of employees that are family members, 5) Primary language other than English, 6) Production costs as a percentage of income, 7) Commodity grown, 8) Gross receipts (under $250k) (page 29)	84.6%	The District strongly supports this recommendation. Many small farmers in the District have second jobs, and therefore do not qualify as SDACs, but the farm operation itself is not able to finance the improvements for irrigation or energy efficiency.
CDFA should develop a three-tiered approach for funding projects. CDFA should add consideration in the evaluation of small agricultural operations. This could be a tiered approach of applications by the agricultural operations size (or grant request amount). (page 29)	79.5%	The District supports a tiered approach to application by size of agricultural operations because small agricultural operations often do not have access to resources for on-farm improvements. The District would appreciate clarifying the definition of “small agricultural operations” in the guidelines.
CDFA should give some priority to regions with higher agricultural production. (page 29)	76.9%	The District agrees this is important, but is less important than prioritizing regions that are critically overdrafted.
CDFA should give some priority to regions with higher agricultural employment. (page 29)	71.8%	The District agrees this is important, but is less important than prioritizing regions that are critically overdrafted.
Pump test and energy/water records should not be required to apply for SWEEP support but would be required to receive	84.7%	The District supports this recommendation because it will increase the likelihood that growers apply to the program by streamlining the application

funding if the project is approved. SWEEP application to include pump efficiency estimate (based on pump age or expert judgement) with actual test completed if project is selected. For projects selected, allow applicants to submit pump test costs as a project expense. Also, allow other entities to cover the cost of the smaller pump tests (< 30 horsepower) for farmers who have submitted applications to SWEEP. Pump tests are encouraged, but not required at time of application submittal.		process.
CDFA should use case studies in training materials and provide examples of successful applications.	89.8%	The District strongly supports this recommendation because in previous rounds, the California Department of Food and Agriculture provided very little information available to growers who submitted unsuccessful applications to help them improve their applications for future rounds. The District also recommends the Department provide a range of water savings or energy savings for successful applications so growers know the target they are trying to meet for a particular type of farmer (e.g. socially disadvantaged) or farm size.
Question 3: How might promotion and coordination of SWEEP be improved with irrigation districts, groundwater sustainability agencies, and the United States Department of Agriculture's Natural Resources Conservation Service and other potential partners?		
Through discussion with agency partners and Governor's office, CDFA should identify SWEEP's role in state-level planning around water resilience. (page 32)	82.1%	The District strongly supports this recommendation given its involvement in implementation of the Sustainable Groundwater Management Act, the Integrated Water Management Plan and other priorities in the 2020 California Water Resilience Portfolio.
CDFA should prioritize strategic outreach coordination in appropriate locations with Farm Bureaus and GSAs (because they are involved with all sizes of farms) and at trade shows and commodity groups. (page 32)	69.3%	The District supports this recommendation because additional outreach will encourage growers to apply for the program, which will help achieve state priorities related to the Sustainable Groundwater Management Act and greenhouse gas emission reduction.
CDFA should give some priority to critically (or approaching critically) over-drafted groundwater basins. (page 32)	82.1%	The District strongly supports this recommendation because the state is requiring critically overdrafted groundwater basins to implement measures to achieve a sustainable groundwater balance prior to other groundwater basins in the state. Groundwater sustainability agencies are applying for funding from the Sustainable Groundwater Management Act Implementation Grant Program to improve surface water irrigation systems and implement

		groundwater recharge projects, but these agencies need growers to also adapt their on-farm irrigation systems as well for maximum benefit in terms of water and energy savings.
CDFA should coordinate with GSAs to avoid incentivizing projects on land that will be fallowed due to SGMA. GSAs should thoroughly investigate and review projects and provide letters of support if able. This would be most applicable to medium and large funding requests. (page 35)	82%	The District agrees this is important, but it is even more important that funded projects are in areas that can use either surface or groundwater to implement conjunctive use projects to aid in SGMA implementation.

Sustainable Conservation

June 16, 2021

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

RE: SWEEP Draft Recommendations - Comments

To Whom it May Concern,

Sustainable Conservation supports the efforts of the ad hoc advisory group convened by the Environmental Farming Act Science Advisory Panel to propose updates to the State Water Efficiency and Enhancement Program (SWEEP). In order to achieve full participation in this program from all agricultural stakeholders and thus maximize the benefits of state funding, we recommend adding the following updates:

- ***Increase the maximum grant award amount from $100,000 to $400,000***

- ***Add significant points for dairy subsurface drip irrigation (SDI) projects into the technical review scoring guidance for upcoming funding rounds***

The ongoing drought has demonstrated the need for not only increased water use efficiency measures, but strategies to address climate change as well. SWEEP is at the juncture of these two challenges; as such, this program is a very important tool to help enable the agricultural sector to meet our state's goals in responding to drought and the larger threat posed by climate change.

Sustainable Conservation works with partners from the agricultural industry, government, the nonprofit sector, and the public to find collaborative, workable solutions to best address the environmental challenges that we all face together. As part of these efforts, we partner with dairy producers to find ways to reduce water use, manage nitrate discharges, and cut greenhouse gas (GHG) emissions. We view SWEEP as a powerful tool to help the dairy sector to implement efficiencies in water use and to substantially reduce GHGs through the implementation of SDI projects at dairy operations. The funding of these projects fits well within the mission of SWEEP, as SDI projects achieve substantial water savings, decreasing overall water use by 36%, in addition to notable reductions in nitrous oxide emissions, decreasing emissions by 70% or more.

While dairies are currently eligible for SWEEP assistance, funding has been limited in the past for these projects. Our recommended updates will help to achieve a balanced approach in the awarding of funds in two ways:

Increasing maximum grant award amounts – The award limit of $100,000 in the prior round of funding had the effect of discouraging applications for dairy SDI projects, as this amount

Sustainable Conservation

represents a partial percentage of the total cost for most projects. Dairy SDI projects have great potential to reduce water use in drought-impacted groundwater basins while also achieving reductions in dairy-generated GHGs, which currently contributes an outsized percentage of the state's total emissions. However, most planned SDI projects exceed in cost the $100,000 threshold.

By raising the limit to $400,000, SWEEP would become a much more accessible program by allowing dairy operators to be full participants in the program and to do their part in achieving water use and climate change goals.

Adding points for dairies to technical review scoring guidance – Given the disproportionate impact that dairy operations have on GHG emissions, incentivizing these businesses to take steps to reduce their carbon footprint makes policy sense.

Prioritizing dairy SDI projects also fits a multi-benefit approach to leveraging state funding for the greatest potential outcomes. These projects not only save water and reduce emissions, but can also be used to mitigate nitrate contamination (thus preserving valuable sources of drinking water) and manage hard-pressed groundwater supplies.

California's dairies are a trademark feature of its agricultural landscape. Providing the opportunity to dairy operators to be fully considered for SWEEP project awards will allow these businesses to take a leadership role in addressing the environmental challenges of today, while building a sustainable industry for generations to come.

If you have any questions about our feedback, please feel free to contact me at 916.469.5159, or cdelgado@suscon.org.

Sincerely,

Charles R. Delgado

Charles R. Delgado
Policy Director

Almond Alliance
OF CALIFORNIA

June 16, 2021

California Department of Food and Agriculture
Office of Environmental Farming and Innovation

Submitted by email: cdfa.oefi@cdfa.ca.gov

Re: Almond Industry Public Comments on the Recommendations Report of the SWEEP Ad Hoc Advisory Group

Dear Sir/Madam:

The Almond Alliance of California along with the Almond Board of California appreciates the opportunity to provide information on the California almond industry in response to the Recommendations Report of the SWEEP Ad Hoc Advisory Group.

About the Almond Alliance:
The Almond Alliance of California is a non-profit trade association dedicated to advocating on behalf of the California Almond industry and is organized to promote the interests of its members. AAC members include almond processors, hullers/shellers, growers and allied businesses. AAC is dedicated to educating state legislators, policy makers and regulatory officials about the California almond community. As a membership-based organization, we raise awareness, knowledge, address current issues and provide a better understanding about the scope, size, value and sustainability of the California almond community.

About the Almond Board:
Established in 1950, the Almond Board of California is a grower-enacted Federal Marketing Order under the supervision of the U.S. Department of Agriculture. The FMO administers a broad-based mandatory program which spans incoming and outgoing quality, compliance, food safety, industry education, market development, and research on the growing, nutrition, and food safety of almonds. The ABC is financed through an assessment collected on each pound of edible almonds delivered.

There are about 7,600 almond growers in California according to the 2017 USDA Agricultural Census, with a 2020 production of 3.0 billion pounds. Almonds are put into commercial channels by approximately 100 handlers. Virtually 100% of U.S. commercial almond production is in California; grown on over 1.5 million acres throughout the Central Valley. California produces over 80% of the global supply.

The Almond Alliance of California along with the Almond Board of California appreciates the opportunity to provide information on the California almond industry in response to the recommendations of the ad hoc advisory group on the state water efficiency and enhancement program.

Almond Alliance
OF CALIFORNIA

General Feedback:

The following is a list of responses to recommendations of the ad-hoc working group:

- Given the constantly evolving irrigation landscape we recommend that SWEEP adopt a process to propose and vet new practices for inclusion in the program, similar to the process used by the Healthy Soils Program.
- We support the recommendation to create a "water-focused" project category that will provide surface water users greater access to SWEEP funding.
- We support the water only focus, alongside improvements in Water Use Efficiency (WUE) as a success metric.
- We support funding installation of surface reservoirs, that allow for pressurizing irrigation supplies and use of surface water (preserving aquifer supplies) which will encourage on-demand use to improve WUE.
- We support providing funds for projects in critically over-drafted groundwater basins, to capture GHG and water benefits as SGMA won't go into effect for several years. It will be very difficult to identify farm level impacts from SGMA at this point leading to the identification of areas that will need to be fallowed.
- We support the recommendation to "create an avenue for application by irrigation districts, incorporating groups of growers." For example, SSJID with support of NRCS EQIP funding installed a pressurized system that allows for optimization of irrigation decisions based on evapotranspiration.
- Similarly, there are many reasons identified in the report for why on-farm weather systems may provide better decision-making capabilities than CIMIS stations, and should remain as a fundable category in SWEEP. If justification is required, clear guidance needs to be provided to reviewers on how to review the proposal.
- Overall, any efforts to simplify applications are appreciated.

We appreciate the opportunity to provide comments.

Sincerely,

Elaine Trevino
President
Almond Alliance of California