



December 16, 2022

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

Subject: Comments on the Climate Smart Agriculture Technical Assistance Program Draft Request for Grant Proposals

Dear OEFI Staff,

Thank you for the opportunity to provide feedback on the draft RFP for the Climate Smart Agriculture Technical Assistance Program. On behalf of the California Climate and Agriculture Network, I write to share our comments.

- 1. We support the proposed increased technical assistance (TA) funding amounts, especially the increase for TA providers supporting farmers in multiple languages.** This increased funding will help build the capacity of TA providers to provide comprehensive and high-quality TA, particularly for socially-disadvantaged farmers that need support in languages other than English.
- 2. We support CDFA allowing TA providers to assist with project verification, and request clarification to specify whether this optional activity is associated with extra funding or is just an allowable activity under the TA grant.** The RGA states that TA applicants “may request funding to assist with HSP practice and/or SWEEP project verification.” We request clarification on whether the funding referred to is additional, and if so, what amount, or within the existing funds.
- 3. We support the addition of soil health and irrigation practice training for TA personnel.** This new allowable cost will help TA providers build their capacity to assist with specific technical aspects of project implementation to help ensure program objectives are met.
- 4. We support advance payments for grantees and request that greater clarification is provided on any rules or limitations regarding allowable advance payment amounts.** The RFP references advance payments on page 13 (“If awardees request and are granted an advance payment, please be aware that it will take up to 4 weeks to process this payment once the grant is executed.”) The payment process section does not specify that advance payments are allowable. We request clarification on the rules regarding advance payments, including the percentage allowed towards advance payments. a

We are excited to see the additional funds and allowable activities to support high-quality technical assistance for HSP and SWEEP. We look forward to this next round of the program, and thank you for inviting our feedback.

Sincerely,

A handwritten signature in cursive script that reads "Anna Larson".

Anna Larson
Policy Associate
California Climate & Agriculture Network
anna@calclimateag.org

From: [CJ Phene](#)
To: CDFA EO OEFI Climate Smart Agriculture Technical Assistance@CDFA
Subject: Comments on Grant Proposals for the Climate Smart Agriculture Technical Assistance Program
Date: Thursday, December 15, 2022 7:01:53 PM

CAUTION: [External Email] - This email originated from outside of our CDFA organization. Do not click links or open attachments unless you recognize the sender and know the content is expected and is safe.

Thank you for the opportunity...

One main observation is that HSP and Sweeps TAPS...

That separating out the two makes sense at first glance but in reality a third option should be considered and that is for projects that combined both aspect and associated benefits...

- The HSP Incentives Program provides financial incentives to California growers and ranchers to implement conservation management practices that sequester carbon, reduce atmospheric greenhouse gases (GHGs), and improve soil health.
- SWEEP provides financial incentives for California agricultural operations to invest in irrigation systems that reduce GHG emissions and save water.

I believe this is more important than bilingual incentives which may very well be discriminatory and subject to legal challenges...it would be far more effective if the program added incentives for projects which addressed both HSP and Sweep goals in a single project...regardless of funding source.

Though most likely outside the scope of this document/program...SWEEP should add new irrigation associated technology in addition to full irrigation systems that reduce GHG, save water, energy, chemicals and improve soil health...these are not mutually exclusive. Further, we offer a solution that addresses significant potential in water savings at the filter station that widely adopted would save thousands of acre feet of water...this is not a full system but rather a retrofit approach...

The reason I draw attention to this is we are also working on another project that shows not only 50% water savings but also improved soil health and prevention of weeds...technical providers should be incented to provide fuller solutions...not waste monies on second language programs where a small minority use English as second language...more cost effective to hire interpretation service to support both programs. In this way either fuller research objectives could be incented or more funds would be available for a wider number of projects...

Note I have worked internationally for years (India, Pakistan, Middle East, North Africa, Europe) as well as domestically where English was a second or third language...this has never been an obstacle to successful project development nor execution.

Thank you for your time...

Regards,

Jim Phene

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