



CALIFORNIA ASSOCIATION OF
RESOURCE
CONSERVATION DISTRICTS

June 25th 2019

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

Dear OEFI Staff,

On behalf of the 96 Resource Conservation Districts (RCDs), and our partner the Carbon Cycle Institute, CARCD thanks CDFA and the OEFI staff for their commitment to participatory program development and feedback. We strongly believe that collaboratively we can produce the results to meet California's goals of sustainable and economically viable agriculture. Thank you for providing us the opportunity to contribute.

We have reviewed the newest iteration of the Technical Assistance Program, legislated by AB2377, and are greatly pleased to see the amendments. Thank you for the consideration and adoption of many of our collective recommendations.

Specifically, we want to appreciate and acknowledge the modification of:

1. Elimination of the phased program framework and adoption of a standard (more flexible) grant program.
2. Removal of designation or stipulation of service area to be covered by technical assistance organizations.
3. Removal of the requirement for TA providers to report farmer and rancher personal information.

These changes will dramatically impact RCD's ability to promote and implement agricultural practices that aid in the sustainability and vitality of California's agriculture.

However, there are still a few components of the draft guidelines that could be improved or clarified.

1. **Accept federally- or state- approved indirect rates.** We are appreciative that the new indirect rate is now up to 20% of personnel costs. However, we continue to encourage accepting any federally- or state-approved indirect rates. As previously stated in our public comment letter, submitted May 24th, 2019, this rate does not represent "extra" funds, but rather a well-documented set of costs that are necessary to the grant-funded work. Our negotiated indirect cost rate agreement requires us to allocate these costs evenly across all grant awards, which means that when a state agency does not honor the same indirect cost rate, we lose money on that state grant. Please refer to our previous letter for greater details on indirect rates.
2. **Flexibility of funding between activities.** The previous iteration of the draft guidelines included language dictating 20% flexibility between pre-award, post-award activities, and budget line items. We recommend maintaining that flexibility to account for the multitude of unknowns around amount of producers enrolled in CDFA's Climate Smart Agriculture Programs (CSA Programs).
3. **CDFA guidance on number of CSA Program solicitations/funding rounds that are expected to be served by awarded Technical Assistance Providers.** Having this information prior to submitting an application is crucial for accurate planning and budgeting. We understand that funding for the CSA Programs is variable each year, however, we recommend sharing the expected number of solicitations,



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and not requiring additional services outside of what has been planned, budgeted, and awarded to technical assistance providers.

4. **Ensure TA Program awards are contracted and finalized at least 3 months prior to CSA Program open solicitation.** As addressed in our previous letter, it is imperative to provide sufficient time between this TA Program solicitation and CSA Program solicitations. Currently, there is no timeline between the two correlating programs. We understand that due to budgetary unknowns it is difficult to foresee exact “open application” dates, however, it would be reassuring to note the timeline in the Program Timeline (i.e. “at least 8 weeks post TA award”).

Once again, we want to express sincere thanks to the CDFA OEFI team for listening, considering, and accepting many of our previous recommendations, and for the same consideration in this second public comment period. CARCD values the opportunity to provide public comment and submit feedback and suggestions to the TA Program and does so with the intention that constructive feedback from many sources creates programs that work better on the ground. CDFA’s programs are making a difference for our farmers, ranchers, and all others that depend on our environment. We look forward to our continued partnership and collaborative efforts to increase climate smart agriculture practices throughout California.

Sincerely,

California Association of Resource Conservation Districts