

## Minutes of the Regular Meeting of the Board of Directors

June 20, 2019

4:00 pm – 6:00 pm

Location: RCD Office

Directors present: TJ Glauthier, Jim Reynolds, Adrienne Etherton

RCD staff present: Kellyx Nelson, Lau Hodges, Amy Kaeser

NRCS staff present: Jim Howard

Guests Present: John Klochak (US Fish and Wildlife Service), Maryna Sedoryk (Pacific States Marine Fisheries Commission), Ron Sturgeon

### 1. Call to Order

Meeting was called to order at 4:08 p.m.

### 2. Introduction of Guests and Staff

All in attendance introduced themselves

### 3. Approval Agenda

Nelson recommended moving items 6.3 and 6.4 to the top of the regular agenda. Kramer moved to approve the agenda as amended, Etherton seconded. Motion passed unanimously.

### 4. Public Comment

No public comment

### 5. Consent Agenda

- Glauthier pulled item 5.3 off of the consent agenda
- Etherton moved to approve the consent agenda as amended, Reynolds seconded. Motion passed unanimously.

### 6. Regular Agenda

#### 6.1 Presentation by Maryna Sedoryk, Pacific States Marine Fisheries Commission (PSMFC): “Salmon and Steelhead Population Monitoring in San Mateo and Santa Cruz Counties.” (presentation attached)

- Directors and guests discussed and asked questions about the presentation, recent populations of steelhead, the RCD’s ability to help PSMFC in outreach and access efforts, local confusion about what PSMFC is, PSMFC’s requirements regarding reporting of illegal activities, coordinating so that PSMFC knows if a data collection site overlaps with an RCD project, and feasibility of coho recovery.

#### 5.3 May 2019 Draft Financial Statements

- Glauthier stated he pulled the Financial Statements to call attention to the quarterly pattern of invoicing and the way it makes the RCD look -\$500K at the end of the fiscal year.

- Directors and staff discussed the importance of how financial statements reflect/ “tell the story” about the RCD’s actual financial health and brainstormed solutions such as: 1) pulling a report that shows a month by month comparison, 2) a note at the top of the report explaining the discrepancy or 3) adding an approximation of labor hours that will be billed.
- Reynolds motioned to approve the May 2019 Draft Financial Statements, Etherton seconded. Motion passed unanimously.

#### **6.4 Board will consider approval of Fiscal Year 2020 (FY20) Budget.**

- Glauthier reviewed the process of the Finance Committee, and the overall financial outlook. Nelson reviewed the proposed budget.
- Directors and staff discussed the operating reserve 6 month goal of \$600K, issues pertaining to cash flow, billing rates, differences between FY 2019 and FY 2020, staff salary adjustments (3% COLA, merit increases, equity within the RCD, and benchmarking outside of the RCD), and the challenge of having only one administrative staff person for an organization with a \$13M annual budget because of the limits in indirect costs in grants.
- Reynolds moved to approve the RCD’s FY20 Budget, Etherton seconded. Motion passed unanimously.

#### **6.2 Executive Directors Report**

- Nelson stated that the RCD was in the middle of a \$6M construction season and noted:
  - Staff are driven by funding and permitting requirements and communications and administrative needs feel secondary.
  - Staff is working on standardization of project management.
  - RCD staff becomes the face of the state’s late payment problem. Shasta RCD wrote a letter to the State Senators outlining the issue as well.
- Glauthier asked Nelson, now that the RCD is currently engaged in big projects with solid leadership, how can the RCD better get the word out. Nelson agreed that the RCD’s relevance and excellence were well known amongst constituents, but the visibility is what is missing.

#### **6.3 Director’s Reports**

- Reynolds had nothing to report.
- Etherton reported on the San Mateo County Weed Management Area’s Picnic in the Weeds held on San Bruno Mountain. Howard asked her what the top weeds were to which she responded broom, fennel and gorse.
- Glauthier reported:
  - More work needed to be done regarding prompt payments at the state level.
  - Bill SB 253 passed at the Assembly. Nelson stated that it would create a corollary to the Farm Bill in the state and allow the state to fund RCDs. Howard stated he was interested in how funding would be allocated and whether or not CEQA would be kicked into projects.

- Glauthier requested the next Board meeting start with a closed session for the Executive Director's evaluation. Reynolds offered to prepare the format.

7 **Adjourn Meeting**

Meeting adjourned at 6:09 p.m.

**Regular Meeting of the Board of Directors  
June 20, 2019  
4:00 pm – 6:00 pm  
Location: 80 Stone Pine Road, Suite 100, Half Moon Bay, CA 94019**

<b>1. Call to Order</b>
<b>2. Approval of Agenda</b>
<b>3. Introduction of Guests and Staff</b>
<b>4. Public Comment-</b> The Board will hear comments on items that are not on the agenda. The Board cannot act on an item unless it is an emergency as defined under Government Code Sec. 54954.2.
<p><b>5. Consent Agenda</b></p> <p>The Board of Directors approves:</p> <ul style="list-style-type: none"> <li>5.1. April 25, 2019 Draft Regular Meeting Minutes</li> <li>5.2. May 16, 2019 Draft Regular Meeting Minutes</li> <li>5.3. May 2019 Draft Financial Statements</li> <li>5.4. Resolution 2019-4: Approval to Enter into Agreement with the California Wildlife Conservation Board for the San Pedro Creek Restoration and Fish Passage Project at Adobe Bridge.</li> </ul> <p>The Board of Directors receives into record:</p> <ul style="list-style-type: none"> <li>5.5. California Association of RCDs 2019 Legislative Update</li> <li>5.6. California Senator Bill Dodd’s SB 253 Incentive Based Conservation Program Fact Sheet</li> <li>5.7. Comment letters to California Department of Food and Agriculture regarding Climate Smart Agriculture Technical Assistance Grants</li> <li>5.8. Half Moon Bay Review article dated May 22, 2019: <i>Agency to host forum on food labels</i></li> </ul>
<p><b>6. Regular Agenda</b></p> <ul style="list-style-type: none"> <li>6.1. Presentation by Maryna Sedorky, Pacific States Marine Fisheries Commission: “Salmon and Steelhead Population Monitoring in San Mateo and Santa Cruz Counties.”</li> <li>6.2. Executive Director Report</li> <li>6.3. Directors’ reports</li> <li>6.4. Board will consider approval of Fiscal Year 2020 Budget.</li> </ul>
<p><b>7. Adjourn Meeting</b></p> <p>The next Regular Meeting of the Board of Directors will be July 18, 2019.</p>

*Public records that relate to any item on the open session agenda for a regular board meeting are available for public inspection. Those records that are distributed less than 72 hours prior to the meeting are available for public inspection at the same time they are distributed to all members, or a majority of the members of the Board. The Board has designated the San Mateo RCD office, located at the address above, for the purpose of making those public records available for inspection.*

## San Mateo Resource Conservation District

06/12/19

## Balance Sheet

Accrual Basis

As of May 31, 2019

	<u>May 31, 19</u>
<b>ASSETS</b>	
<b>Current Assets</b>	
<b>Checking/Savings</b>	
1030 · Checking Account (5269)	1,782,380.25
1031 · Restricted State Funds (5012) (Butano Channel)	26,626.84
1032 · Operating Reserve (0202)	148,805.18
<b>Total Checking/Savings</b>	<u>1,957,812.27</u>
<b>Accounts Receivable</b>	
1200 · Accounts Receivable	1,983,106.95
<b>Total Accounts Receivable</b>	<u>1,983,106.95</u>
<b>Total Current Assets</b>	<u>3,940,919.22</u>
<b>TOTAL ASSETS</b>	<b><u>3,940,919.22</u></b>
<b>LIABILITIES &amp; EQUITY</b>	
<b>Liabilities</b>	
<b>Current Liabilities</b>	
<b>Accounts Payable</b>	
2000 · Accounts Payable	737,027.97
<b>Total Accounts Payable</b>	<u>737,027.97</u>
<b>Other Current Liabilities</b>	
2060 · Accrued Time Off	43,193.34
2400 · Deferred Revenue	
2405 · Bonde Weir	6,081.36
2410 · Santa Cruz Mountain Stewardship	207,690.46
2411 · SCMSN - Atlas Project	139,972.58
2412 · SCMSN-Spotlight Stewardship	45,374.24
2413 · SCMSN-Permitting	12,252.38
2420 · MROSD - Driscoll Ranch	11,119.60
2421 · MROSD - Apple Orchard	14,107.50
2425 · Randtron Antenna	3,424.32
2430 · PG&E - Butano Mitigation Proj.	977,553.16
2431 · PG&E - Project Development	22,952.57
2432 · PG&E Foundation - Hedge Rows	15,000.00
2435 · Cloverdale Ponds	75,132.38
2445 · SMC Old Haul Raod Phase 1	13,403.68
2450 · STATE - Butano Channel (HE-BC-STATE)	-2,534.96
2451 · SMC - Butano Channel	625,000.00
2460 · SMC - Ag Ombudsman	15,619.57
2465 · NACD - Urban Farming TA	20,592.75
2470 · SVCF - Carbon Farm Planning	17,132.71
2480 · Colma - Cemetery Sustainability	8,043.00
2490 · POST Match Funds	125,000.00
2400 · Deferred Revenue - Other	16,426.00
<b>Total 2400 · Deferred Revenue</b>	<u>2,369,343.30</u>
<b>Total Other Current Liabilities</b>	<u>2,412,536.64</u>
<b>Total Current Liabilities</b>	3,149,564.61
<b>Long Term Liabilities</b>	
2500 · Recoverable Grants	200,000.00
<b>Total Long Term Liabilities</b>	<u>200,000.00</u>
<b>Total Liabilities</b>	3,349,564.61

2:02 PM

San Mateo Resource Conservation District

06/12/19

**Balance Sheet**

Accrual Basis

As of May 31, 2019

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	<u>May 31, 19</u>
Equity	
3500 · Net Assets	1,157,840.47
Net Income	<u>-566,485.86</u>
Total Equity	<u>591,354.61</u>
<b>TOTAL LIABILITIES &amp; EQUITY</b>	<b><u><u>3,940,919.22</u></u></b>

## San Mateo Resource Conservation District

## Profit &amp; Loss

06/12/19

July 2018 through May 2019

Accrual Basis

	<u>Jul '18 - May 19</u>
Ordinary Income/Expense	
Income	
SMC Operating Support	125,000.00
4010 · Contracts	5,416,617.47
4020 · Donations	
4021 · Annual Appeal Donation	16,570.07
4022 · Individual Contributions	32,464.00
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Total 4020 · Donations	49,034.07
4030 · Interest	2,099.19
4200 · Property Tax	124,721.36
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Total Income	5,717,472.09
Gross Profit	5,717,472.09
Expense	
5000 · Personnel	854,429.20
6020 · Bank Fees	268.51
6070 · Communications	5,763.07
6300 · Equipment	6,579.17
6400 · Insurance	6,560.06
6500 · Membership-Dues-Subscriptions	3,599.00
6750 · Professional Development	4,390.37
6775 · Software	2,357.95
6850 · Rent	48,635.40
6900 · Supplies	5,308.05
6950 · Travel-Meals-Meetings	6,349.48
7200 · Organizational	69,930.01
7600 · Project Implementation	5,269,787.68
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Total Expense	6,283,957.95
Net Ordinary Income	-566,485.86
Net Income	<hr/> <b>-566,485.86</b> <hr/>

**RESOLUTION 2019-4**

**APPROVAL TO ENTER INTO AGREEMENT WITH THE CALIFORNIA WILDLIFE  
CONSERVATION BOARD FOR THE SAN PEDRO CREEK RESTORATION AND  
FISH PASSAGE PROJECT AT ADOBE BRIDGE**

**WHEREAS**, the San Mateo Resource Conservation District is a Special District organized under Division 9 of the California Public Resources Code with an original petition granted on July 1, 1939;

**WHEREAS**, the San Mateo Resource Conservation District is defined in Section 3501 of the Government Code as a public agency;

**WHEREAS**, funds were made available to the Wildlife Conservation Board through the Parks, Environment, and Water Bond of 2018 (Proposition 68) for projects that enhance State and local parks, environmental protection and restoration, water infrastructure, and flood protection;

**WHEREAS**, San Mateo Resource Conservation District intends to address fish passage and instream habitat in San Pedro Creek by designing and permitting the remediation of a priority fish passage barrier at Adobe Bridge;

**WHEREAS**, the California Wildlife Conservation Board may encumber \$182,000 through the Wildlife Corridor and Fish Passage Program for the San Mateo Resource Conservation District to implement the San Pedro Creek Restoration and Fish Passage Project at Adobe Bridge;

**WHEREAS**, the California Wildlife Conservation Board requires a resolution from the governing body of the grant recipient authorizing its designee to sign a financial assistance agreement, and any amendments thereto;

**NOW THEREFORE BE IT RESOLVED** that the San Mateo Resource Conservation District Board of Directors hereby:

1. Authorizes its Executive Director to conduct negotiations, execute, submit, and sign all documents including but not limited to applications, agreements, amendments, payment requests, and other documents which may be necessary for the completion of the proposed project;

2. Certifies that the Resource Conservation District will comply with all federal, state and local environmental, public health, and other appropriate laws and regulations applicable to the project and will obtain or will ensure that the other project partners obtain all appropriate permits applicable to the project; and
3. Further commits to the terms and conditions specified in the grant agreement.

**ADOPTED** at a regular meeting of the Board of Directors of the San Mateo Resource Conservation District on June 20, 2019.

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TJ Glauthier, President

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Date



## **2019 Legislative Update for RCDs**

The California Association of Resource Conservation Districts (CARCD) advocates for RCDs at a statewide level to help raise their visibility amongst partners and legislators, to secure new sources of funding for capacity building and on-the-ground projects, and to help give voice to California's critical conservation issues. In partnership with our lobbyists at Pacific Policy Group, CARCD is actively engaged with legislators on the following bills:

### **SB 253 – The Environmental Farming Incentive Program**

CARCD and The Nature Conservancy have co-sponsored Senate Bill 253 (Dodd), a bill to establish the Environmental Farming Incentive Program (EFIP) at the California Department of Food and Agriculture. This bill would create a state analog to NRCS' EQIP program, and enhance conservation on California's farms and ranches by offering incentives and technical assistance for adopting practices that help protect wildlife and improve fish and wildlife habitat. Eligible land would include cropland, range land, pastureland and other farm or ranch lands. If passed, this program would essentially serve as baseline funding for participating RCDs.

### **AB 933 – Ecosystem Resilience Program (aka Watershed Coordinator Program)**

CARCD is supporting AB 933, which would establish an Ecosystem Resilience Program housed at the CA Department of Conservation. The program would fund watershed coordinator positions. We have worked with the author's office to ensure that RCDs are cited as eligible entities for the program, and that the geographic watersheds and ecosystems will include urban and rural lands, agricultural and riparian lands, and forests.

### **SB 45 – Climate Resilience Bond**

CARCD is supporting SB 45 (Allen), the Wildfire, Drought, and Flood Protection Bond Act of 2020. SB 45 provides an opportunity for California to take steps towards making local communities and our natural environment more resilient by investing in programs that help the state adapt to and withstand the impacts of climate change. CARCD is working with the author's office to discuss important programs that could help the state meet its climate resilience and adaptation needs through RCDs.

## Forest & Fire Bills

This year, in response to the past few years of catastrophic wildfires, the legislature has been extremely focused on forest health and fire resilience. CARCD is participating in to these conversations on behalf of RCDs because there are huge opportunities for RCDs to benefit from the programs and policies that are being developed. Many RCDs throughout the state have been working on these issues long before they became a priority for the Governor and the legislature. We see an opportunity for RCDs to be one of the go to entities to help the state with it's forest health and fire prevention goals.

- **AB 1516 (Friedman)** would improve California's fire prevention policies with a focus on defensible space requirements. AB 1516 will not only make defensible space a priority, but will also clarify that counties can loan funds to RCDs to conduct fire prevention work and add RCDs to the list of eligible groups that CAL FIRE can partner with to conduct defensible space work. The requirements of AB 1516 will improve fire prevention in California and provide important clarifications on how local and state partners can work together to address the challenge of fire resilience.
- **SB 190 (Dodd)** would assist in wildfire prevention and response by investing in defensible space and provide increased education to the public on the importance of defensible space.
- **SB 462 (Stern)** would establish a forestland restoration workforce program curriculum within the California Community Colleges. A forestland restoration workforce program is critical for increasing the number of trained professionals to help RCDs meet the demand for fire resilience projects statewide.
- **AB 883 (Dahle)** would require the Department of Fish and Wildlife, in consultation with Department of Forestry and Fire Protection, to annually study, investigate, and report to the Legislature on the impacts on wildlife and wildlife habitat resulting from any catastrophic wildfire that occurred during that calendar year.

## Other Updates

- **Baseline Funding:** This need continues to be *the* top priority for CARCD and Pacific Policy Group. We are currently working on all avenues of funding for RCDs, including baseline funding, advance payments, prompt payments of invoices with the state, and capacity building.
- **Conservation Issues:** We are engaged in conversations with legislators on topics including monarchs, healthy soils, invasive weeds, and budget requests.



## SB 253 – DODD Incentive Based Conservation Program

### Summary

SB 253 would require the California Department of Food and Agriculture, upon appropriation by the Legislature, to establish and administer an incentive-based conservation program. The bill would require the program to optimize wildlife habitat benefits while supporting the economic viability of California agriculture by providing incentives and technical assistance to farmers and ranchers.

### Background

Agriculture is a major industry for California. With 76,400 farms and ranches, California agriculture is a \$54 billion-dollar industry that generates at least \$100 billion in related economic activity. California's agricultural and rural lands are a reflection of the innovation and economic leadership of the state.

California's farmland provides many benefits to people and the environment. "In addition to valuable open space and wildlife habitat, the management decisions and conservation practices of farmers and ranchers also enhance environmental quality, provide recreational opportunities and offer social benefits" (California Department of Food and Agriculture, 2014). More resources and tools are needed for California's farmers and ranchers to address climate change and provide multiple conservation benefits through on-farm practices.

In recent years, especially during and after the drought, the delivery of on-farm conservation practices has declined. This is driven by the

rising cost of agricultural production, including water and energy costs. For example, there is approximately 75% less winter flooding of rice fields for migratory bird habitat in "high-cost" water districts, thus demonstrating the price sensitivity to growers' use of this practice based upon costs/benefits of flooding versus other practices (California Rice Commission). Thoughtful incentive programs are needed for California's farmland to continue to provide important conservation benefits.

The purpose of the program is to provide assistance to agricultural producers who want to voluntarily make wildlife-friendly improvements on their land. The program would provide financial and technical assistance to agricultural producers who create fish and wildlife habitat and provide added environmental benefits such as improved water quality, erosion control, and conserved ground water. Eligible land would include cropland, rangeland, pastureland, and other farm or ranch lands. These conservation activities, or practices, benefit fish and wildlife while also boosting the land's resiliency and production.

The health of California's agricultural lands is critical to the environment, our economy and to rural communities.

### Existing Law

Existing law, the Cannella Environmental Farming Act of 1995, requires the Department of Food and Agriculture to establish and oversee an environmental farming program to



provide soil health and water efficiency incentives. The act requires the Secretary of Food and Agriculture to convene the Scientific Advisory Panel on Environmental Farming to provide advice to the Secretary on the implementation of the Healthy Soils Program and the State Water Efficiency and Enhancement Program and assistance to federal, state, and local government agencies on issues relating to the impact of agricultural practices on air, water, and wildlife habitat.

#### This Bill

SB 253 would require the California Department of Food and Agriculture, with advice from the Scientific Panel, to establish and administer an incentive-based conservation program. The bill would require the program to seek to optimize habitat benefits while supporting the economic viability of California agriculture by providing incentives, and outreach to farmers whose management practices contribute to wildlife habitat and result in on-farm activities that provide multiple conservation benefits.

#### Support

The Nature Conservancy  
California Resource Conservation Districts

#### Opposition

None on file

#### Contact

Les Spahnn: 916-651-4003;  
leslie.spahnn@sen.ca.gov



California Department of Food and Agriculture  
 1220 N Street  
 Sacramento, CA 95814

May 23, 2019

Re: AB 2377 Implementation

Dear CDFA Staff,

On behalf of the undersigned 18 stakeholder organizations, we submit the following comments on the Climate Smart Agriculture Technical Assistance Grants draft RFP.

Many of the undersigned organizations have a tremendous amount of on-the-ground experience providing technical assistance (TA) to farmers and ranchers and implementing a variety of conservation incentive programs. We believe our collective experience is critical to informing this new technical assistance program and scaling up the impact and reach of the Climate Smart Agriculture (CSA) Programs.

To put our collective experience in perspective, the following is a snapshot of the undersigned organizations' experience providing TA over the lifetime of the CSA programs (i.e. not counting NRCS or other conservation programs):

- 14 have provided TA for at least one of the CSA programs
- 10 have provided TA for two or more of the CSA programs
- 12 have provided TA for two or more rounds of the CSA programs
- 450: the approximate number of farmers and ranchers collectively assisted for the CSA programs

Many of our comments echo and build on the letter (attached at the end) that 25 stakeholder organizations submitted to CDFA on March 7<sup>th</sup>, seven weeks before the current draft RFP was released.

## Comments on the Draft RFP

### 1) **Allow the full range of TA activities identified by TA providers and envisioned in AB 2377**

In the letter submitted by 25 stakeholder organizations on March 7<sup>th</sup>, a list of 19 TA activities was recommended to be eligible in the program. Some of these were incorporated into the draft RFP, but other critical ones were not. Below, we list those practices that were not included in the draft RFP:

1. **Traveling to farms and agricultural community meetings.** Conducting farm visits and site surveys with interested producers is necessary to develop trust with a producer and site-informed project proposals. Additionally, attending events, including field days and agricultural community meetings, to educate farmers about Climate Smart Agriculture practices and programs should be included.
2. **Developing conservation plans** (including carbon farm plans) that incorporate Climate Smart Agriculture practices. These plans are often producers' first step towards applying for incentive programs, ensure applications are part of longer-term, whole-farm management strategy, and position producers to leverage multiple funding sources to scale up Climate Smart Ag practices.
3. **Assisting in obtaining CEQA and other relevant permits.** This is especially critical for project-readiness for AMMP applications.
4. **Designing and engineering AMMP, SWEEP, and HSP projects** directly or sub-contracting the design and engineering to technical experts. Although project design is listed in the Program Framework, project design and engineering were not included in Phase 1 activities.
5. **Paying the upfront cost of pump testing for SWEEP.** This has been identified as a barrier, particularly for small and socially-disadvantaged farmers and ranchers, in applying to the program. In the absence of the SWEEP program funding this, TA providers should be allowed to purchase tests upfront for producers applying to SWEEP and be reimbursed quarterly.
6. **Arranging rented or shared equipment (e.g. compost spreaders, no-till drills) and/or volunteer labor** for project implementation. This is a role that TA providers often play to support implementation.
7. **Sub-contracting translation services** for materials and meetings with producers. Most TA providers do not have bilingual staff, so must sub-contract these services in order to provide outreach and assistance to non-English-speaking producers.

**2) Replace the two-phase, reimbursement-based structure with a standard grant structure that:**

- a) Gives TA providers the flexibility to be responsive to the needs of unique farmers/ranchers, especially socially disadvantaged farmers and ranchers (SDFRs).
- b) Respects TA providers as trusted, accountable partners with on-the-ground expertise.
- c) Allows TA providers to create an accurate and consistent budget, retain staff or contract partners, and build their capacity over the course of the 3-year grant.
- d) Eases TA provider administrative burdens to maximize the time TA providers are providing direct services to farmers/ranchers.

The Science Advisory Panel discussion and subsequent public comments on April 18 revealed a number of critiques of the controversial two-phase, reimbursement-based structure laid out in the draft RFP. More than a dozen TA providers, as well as a few Panel members, noted the following:

1. The overall system is unnecessarily complicated, confusing, and restrictive. The overall goal of the Program's TA grants should be to build steady, growing, long-term demand from producers for the CSA programs to enable the State to meet its GHG goals for the agricultural sector. Both TA providers and producers need user-friendly programs that enable them to easily participate in a manner that best suits their unique circumstances and context. As designed, the TA Program does not acknowledge nor build upon the expertise and experience in the field.
2. The "Phase 1" structure is too narrowly focused on application assistance, failing to recognize the full breadth, time, cost, and value of assistance leading up to a producer deciding to apply. Ironically, the structure also fails to recognize the role that TA providers can play in preparing producers to apply in subsequent years. In our experience, producers often learn about a program from a TA provider in one cycle, then take time to develop a project proposal and work with a TA provider to apply in the following cycle. Under the proposed system, a TA provider would have to apply and be awarded TA grants in back-to-back years in order to provide that support.
3. The proposed base payment and reimbursement rates for TA services are insufficient, are *not* based on actual TA provider data, and fail to recognize the highly variable costs of TA depending on the producer(s) and a number of other factors. This especially limits TA providers' ability to provide TA to socially disadvantaged farmers and ranchers. Multiple TA providers have noted the current reimbursement system has forced them to provide their services at a loss, which they cannot sustain going forward.
4. The Phase 1 reimbursement structure is unrealistic. To put this in perspective, we can look at two hypothetical scenarios, which generously assume half of producers assisted successfully apply for the program. For Healthy Soils and SWEEP, a TA provider would need to assist 50 producers, 25 of which successfully submit applications, in order to be reimbursed the full \$20,000 in Phase 1. For AMMP, a TA

provider would have to assist 22 producers, 11 of which successfully submit applications, in order to be reimbursed the full \$20,000 in Phase 1. We are unaware of any TA providers who have had that level of success in a single round to-date.

5. The two-phase and reimbursement-based system prevents TA providers from being able to create an accurate budget, which in turn makes it risky to hire staff or contract partners. This creates financial uncertainty and administrative and accounting complexity for TA providers.

All of these concerns can be addressed by replacing the proposed structure with a simpler, standard technical assistance grant structure that is the norm across other climate investment programs. We appreciate the intent behind the SAP's suggestion to allow 25% of the funds from either phase to be re-allocated to the other. While this would be an improvement, it also adds another layer of complexity to an already complicated funding scheme and does not address the root causes of many of our concerns above.

The reality is TA providers, who work with producers every day and are accountable to producers on their boards (for RCDs, County Farm Bureaus, and most NGOs), are best positioned to respond to producers' diverse needs and determine when and how to provide TA. To be successful, this program must give TA providers -- who will have submitted detailed work plans and staff qualifications to demonstrate they can get the work done -- the flexibility to be responsive to producers' needs.

We strongly recommend replacing the proposed structure with a 3-year, standard grant, similar to what the Strategic Growth Council offers for its TA grant program for the Transformative Climate Communities program, another GGRF-funded program.

### **3) Allow federally-approved indirect rates for organizations that have them and a 20% indirect rate for those that do not**

Indirect costs are real costs. They include items associated with keeping an organization running, like rent, utilities, administrative staff compensation, and in the case of TA providers, vehicles and other field equipment. Sufficient indirect rates are essential to making these grants feasible for RCDs, UCCE, and NGOs, which often have very little general operating funds. Rather than base the eligible indirect rate on an arbitrary discussion of what other state agencies use, the rates should be based on *actual* needs and data from TA providers. Nearly all of the undersigned organizations have indirect rates between 20-35%, many of which have been thoroughly vetted and approved with federal agencies. The proposed 15% indirect rate will discourage some of the most effective TA providers in the state from continuing to partner with CDFA, as operating at a loss is not a sustainable option for them. SGC offers 20% for the TA program; CDFA should offer this as a baseline measure if a TA provider does not have a federally-approved indirect rate.

### **4) Include people with relevant TA experience and expertise as part of an external review committee with an appropriate recusal policy to avoid conflicts of interest**

The technical review and scoring process is critical to maximizing the impact of this new TA program, including for priority populations. In order to ensure the most impactful proposals are awarded, reviewers must have enough knowledge of the landscape of TA providers and how TA works for agricultural conservation incentive programs to shrewdly evaluate work plans, budgets, and qualifications. As such, experienced TA providers are likely to be the most effective application reviewers, whether they are from NRCS, UCCE, RCDs, or NGOs.

The draft RFP states “third party reviewers from different state agencies will be selected to review the applications.” We recommend revising this to read “third party reviewers with technical assistance experience and expertise will be selected to review the applications.” Those could be from state agencies, NRCS, UCCE, RCDs, or relevant NGOs. To avoid conflicts of interest, we recommend adopting a recusal policy similar to what CDFA uses for the Specialty Crop Block Grant Program.

**5) Clarify that the requirement that “at least 25 percent of the grant program funds are used to provide technical assistance to socially disadvantaged farmers or ranchers” applies to the TA Grant Program as a whole, *not* every individual TA provider.**

We appreciate the draft RFP places a clear priority on socially-disadvantaged farmers and ranchers (SDFRs), as well as farms and ranches of 500 acres or less, through its administrative review priority and workplan, statement of qualifications, and reporting requirements. We also appreciate the draft RFP sets an implicit expectation all TA providers will consider how to reach out to and assist SDFRs in the area they are serving.

To avoid confusion, we wish to see the draft RFP clarify that the 25% requirement applies to the TA Grant Program as a whole, *not* every individual TA provider. This means CDFA could meet this requirement in a number of ways. For example, if a few TA providers specializing in TA to SDFRs are selected and serve 75% or even 100% SDFRs, other TA providers could serve less than 25%. As long as the balance of funds being used to provide TA to SDFRs meets or exceeds 25%, the requirement will be met.

The authors and sponsors of AB 2377 intended for CDFA to have this flexibility, acknowledging that SDFRs are not evenly distributed across the state and that some TA providers have more of a focus and history working with SDFRs than others. We think this is worth clarifying in the administrative review and the scoring criteria sections, as well as in the preview of applicant information and questions.

**6) Remove requirement that TA providers must provide services to multiple counties**

After robust feedback from both RCD and UCCE TA providers on the exclusionary effect, legal limitations, and unintended consequences of requiring TA providers (including RCDs, UCCE, and County Farm Bureaus) to serve producers outside their defined service area, the SAP voted to recommend removing the rule under “Eligibility and Exclusions” that “Technical assistance providers cannot have a defined service area such as a region or a county.” However, the draft RFP still effectively maintains this requirement by requiring on page 6, under “Program

Requirements and Deliverables,” that “A technical assistance provider cannot limit services to a specific county and/or region” and that “An awardee must be able to serve farmers and ranchers seeking technical assistance from multiple counties.” Those two bullets should be eliminated as well in alignment with the clear direction and intent from the SAP.

Thank you for the opportunity to comment.

Sincerely,

Adria Arko  
Program Specialist  
San Mateo RCD

Jane Sooby  
Senior Outreach & Policy Specialist  
California Certified Organic Farmers

Brian Shobe  
Associate Policy Director  
California Climate & Agriculture Network

Jean Okuye  
Executive Director  
East Merced RCD

Cooper Freeman  
Program Manager & Policy Advocate  
Occidental Arts & Ecology Center

Jo Ann Baumgartner  
Executive Director  
Wild Farm Alliance

Curtis Ihle  
Interim Executive Director  
Humboldt RCD

Lance Andersen  
Agricultural Program Director  
Mission RCD

Dave Runsten  
Policy Director  
Community Alliance with Family Farmers

Rebecca Burgess  
Executive Director  
Fibershed

Devin Best  
Executive Director  
Upper Salinas - Las Tablas RCD

Rex Dufour  
Western Regional Office Director  
National Center for Appropriate Technology

Dr. Chandra Richards  
Conservation Ecologist  
RCD of Greater San Diego County

Sacha Lozano  
Ag Program Manager  
RCD of Santa Cruz County

Elizabeth Harper  
Executive Director  
Colusa County RCD

Valerie Quinto  
Executive Director  
Sonoma RCD

Jan Derecho  
Executive Director  
Ecological Farming Association

William J. Hart  
Project Manager  
Gold Ridge RCD

## Addendum

Letter Submitted by 25 Stakeholder Organizations on March 7th, 2019



California Department of Food and Agriculture  
1220 N Street  
Sacramento, CA 95814

March 7<sup>th</sup>, 2019

Re: AB 2377 Implementation

Dear CDFA Staff,

On behalf of the undersigned 25 stakeholder organizations, we write to share our recommendations on the AB 2377 technical assistance (TA) grant program draft RFP.

Comprehensive and quality TA is critical to the success of CDFA's Climate Smart Agriculture programs. Farmers and ranchers are extraordinarily busy people, managing complex businesses in a risky, low-margin, highly regulated, and ever-changing environment. This reality makes taking time to learn about new management practices and experimenting a very slow and time-consuming process. With greater weather extremes already taking a heavy toll on the agricultural industry, we must accelerate the industry's transition to Climate Smart Agriculture through greater investment in technical assistance.

Without technical assistance, many farmers do not have the resources, time, or energy to effectively plan, apply for, implement, and monitor Climate Smart Agriculture projects on their own. This is especially

true for small and mid-scale producers and historically disenfranchised farmers and ranchers who do not have ready access to technical service providers or paid consultants.

Comprehensive and culturally-responsive TA acts as the necessary bridge for farmers and ranchers to learn about and successfully participate in the Climate Smart Agriculture programs. When we look at the counties with the highest concentrations of Healthy Soils, AMMP, and SWEEP grants, we can often point to specific TA providers within those regions who played a significant role in those counties' success. There are very effective TA partnerships, albeit under-resourced, working with farmers and ranchers across the state to plan and implement high-impact projects.

Beyond increasing the success of CDFA programs, TA providers also act as catalysts for the broader transition to Climate Smart Agriculture. As trusted members of their local communities, they facilitate the transfer of knowledge between producers; host field days and educational events to demonstrate innovative practices, research, and technologies; and problem-solve the unique challenges of individual farms. They also help producers utilize and piece together various funding sources, from farm bill programs to private conservation initiatives, which are necessary to sustain and scale climate-smart agriculture.

The state's investments have jump-started and continued to advance the transition to Climate Smart Agriculture. But state funding for the Climate Smart Agriculture programs will never be enough to transition all 77,000 farms within the state. If effectively supported, TA providers can leverage the state's investment by getting farmers in the pipeline to receive federal and private funding and catalyzing those with means to adopt Climate Smart Agricultural practices without any incentive funding at all. In fact, TA providers are already doing just that -- generating millions of dollars of investments that should be leveraged with the state's Climate Smart Agriculture programs.

By recognizing the breadth of what effective TA consists of, the implementation of AB 2377 can seek to support TA providers in playing creative and collaborative roles in accelerating Climate Smart Agriculture beyond the scope of the state's modestly funded programs.

Our more detailed recommendations follow.

### **Recommendations for the AB 2377 Draft RFP**

#### **1. Implement the comprehensive definition of TA included in AB 2377**

AB 2377 defines TA as: outreach, education, project design, application assistance, and project implementation. Under that definition, we recommend the following should be eligible activities under AB 2377 grants:

1. Hosting or attending events, including field days and agricultural community meetings, to educate and learn from farmers about Climate Smart Agriculture practices and programs

2. Developing educational, culturally-relevant, and multi-lingual materials about Climate Smart Agriculture practices, such as videos, illustrated guides, and trainings
3. Sub-contracting translation services for materials and meetings with producers
4. Traveling to and conducting farm visits and site surveys with farmers and ranchers interested in Climate Smart Agriculture
5. Developing conservation plans (including carbon farm plans) that incorporate Climate Smart Agriculture practices
6. Assisting farmers and ranchers in applying for CDFA's Climate Smart Agriculture programs and recommending other funding opportunities, including USDA-NRCS farm bill conservation programs
7. Assisting in obtaining CEQA and relevant permits for AMMP and HSP projects
8. Designing and engineering AMMP, SWEEP, and HSP projects directly or sub-contracting the design and engineering to technical experts
9. Assisting farmers and ranchers in obtaining bids from contractors
10. Paying the upfront cost of pump testing for SWEEP
11. Assisting farmers and ranchers in obtaining necessary documentation (e.g. maps, bills, farm records) for the application
12. Arranging rented or shared equipment and/or volunteer labor for project implementation
13. Assisting HSP grant recipients in sourcing cover crop seeds, compost, mulch, plant materials, and other materials for eligible conservation planting projects
14. Preparing sites and installing HSP, SWEEP, and AMMP projects, including the systems and materials to ensure their success (e.g. watering systems, gopher and deer protection for hedgerows).
15. Assisting grant recipients in filing paperwork for grant contracts, budget changes, reimbursements, and reporting
16. Conducting baseline and years 2-3 soil sampling for HSP projects
17. Providing training and in-field assistance with the implementation and maintenance of HSP, SWEEP, AMMP projects
18. Monitoring HSP, SWEEP, and AMMP projects to assess impacts and optimize performance of projects

19. Attending trainings, conferences, or workshops on skills relevant to TA for the programs, including conservation or carbon farm planning, practice implementation, communication strategies, cultural-competency trainings for working with Socially Disadvantaged Farmers/Ranchers (SDFRs), and new science.

**2. End the "per-application-submitted reimbursement" process for TA. Opt for a traditional grant system that achieves accountability and flexibility instead, similar to other TA programs for Climate Change Investment Programs.**

CDFA's recent adoption of a per-application reimbursement process discourages TA providers from prioritizing hard-to-reach farmers (including SDFRs), disincentivizes providers from assisting with project implementation, and effectively puts a price tag on every farmer, turning TA into a commission-based service. While we understand and appreciate CDFA's intent to ensure impact and accountability, we are unaware of any evidence that such an approach yields heightened accountability or impact. Other TA programs for Climate Change Investments do not take this approach.

Accountability can be achieved with a traditional grant program, including through grant application requirements, a well-qualified review committee with a thorough review process, and strategic program metrics and associated reporting and evaluation requirements, including the number of applications assisted. Traditional grant programs, when well-designed and administered, can engender both accountability and creativity to achieve impacts in multiple ways. Furthermore, AB 2377 requires CDFA to fund TA beyond application assistance. A per-application reimbursement approach is not appropriate for the assistance required under AB 2377 definitions.

**3. Allow adequate indirect/overhead costs to be part of the grant**

Sufficient overhead is essential to making these grants feasible for RCDs, UCCE, and NGOs, who often have very little general operating funds. We recommend allowing organizations to use their federally approved indirect rate, if they have one, or use a 20% indirect rate if they do not. For comparison, the Transformative Climate Communities grants at the Strategic Growth Council allow up to 20% indirect or overhead costs. In addition, we recommend allowing TA providers to request \$5,000-\$10,000 of their grants upfront in order to prevent cash flow challenges for the organizations. Insufficient indirect/overhead costs will discourage effective TA providers from partnering with CDFA to help scale the Climate Smart Agriculture programs.

**4. Maintain the \$100,000 per year maximum grant award for all 3 years, regardless of gap years in any individual program's funding**

Effective TA depends on gaining the trust of a producer and significant knowledge of an operation, which take time and consistent communication. When a TA provider approaches a producer about trying out a new practice, developing a Climate Smart Agriculture plan, or applying for a government program, the producer wants to know that the TA provider is committed to seeing the practice or project through.

Additionally, in order to hire someone to implement an AB 2377 grant, TA providers need a commitment to three years of funding.

For all of those reasons, CDFA should commit to funding a TA provider in the full 3-year period, regardless of the possibility of a gap year in the Climate Smart Agriculture program funding. In the unfortunate event that there is a gap year in funding for one of the Climate Smart Agriculture programs, TA providers will still play a vital role in implementing, maintaining, and monitoring previously-awarded grants. That work will include continuing to educate producers about Climate Smart Agriculture practices, working with producers to develop plans involving Climate Smart Agriculture practices, and getting producers in the pipeline to apply for federal funding or state funding when it becomes available again. Relationship-based, consistent TA over three years is necessary for producer confidence, effective implementation, and continuing to build interest in Climate Smart Agriculture practices.

**5. To ensure *at least 25 percent of the grant program funds are used to provide TA to Socially Disadvantaged Farmers and Ranchers (SDFRs) (as required by AB 2377):***

1. Establish clear expectations and outreach metrics
2. Require detailed outreach plans and staff/partner qualifications
3. Prioritize and provide additional support to TA providers working with a majority of SDFRs
4. Plan for the Farmer Equity Advisor to attend key gatherings of SDFRs in the state

First, set clear expectations that all TA providers are expected to reach out to SDFRs in their region, and require applicants to estimate how many SDFRs they plan to work with. Second, require applicants to demonstrate that they have staff and/or community partners with experience working in their target communities (including those that have proficiency speaking the native language of the producers in that community) and that they have developed an effective outreach plan to reach these producers. If TA providers do not have staff and/or community partners with such experience and want help in developing an effective outreach plan, encourage them to consult with the Farmer Equity Advisor. Third, prioritize applicants who demonstrate on their application that the majority of producers they provide effective TA to are SDFRs and allow them to request additional grant program funding for translation services, the production of outreach materials (such as videos, which may be used by other TA providers in the program), and additional outreach-related expenses. Finally, plan for the Farmer Equity Advisor to attend key gatherings of SDFRs in the state (e.g. Latino Farmers Conference, annual meetings of tribes that have agricultural operations) to raise awareness about Climate Smart Agriculture programs and the TA available.

**6. Support and facilitate the sharing of best management practices and outreach materials amongst TA providers through TA-provider led trainings**

AB 2377 requires CDFA to “Support annual information sharing among TA providers, the department, and other relevant stakeholders for the continuous improvement of programmatic guidelines, application processes, and relevant climate change and agricultural research.”[1] We recommend CDFA leverage the annual information sharing part of this requirement as an opportunity to fund experienced and highly effective TA providers to lead trainings for fellow TA providers on topics such as “how to run a

successful field day at demonstration projects” and “strategies for effective outreach and TA with SDFRs.” This could also be an opportunity to bring together UCANR’s new Climate Smart Agriculture Team, the California Association of Resource Conservation Districts, the Carbon Farming Network, and groups specializing in TA for SDFRs like the California Farmer Justice Collaborative, NCAT/ATTRA, and some Cooperative Extension and RCD staff. We also recommend that CDFA share outreach and education materials such as flyers, Powerpoint presentations, guidebooks, and videos created by TA providers on its website to make them easily accessible for other TA providers to use.

**7. Allow joint applications from multiple TA providers for sharing TA staff and resources**

In some cases, it may make sense for multiple TA providers in a region to collaborate on a joint AB 2377 grant, allowing them to share staff with particular expertise and skills (e.g. irrigation, soil conservation, manure management, or bilingual skills) and achieve a larger regional impact than they could individually. We recommend that CDFA encourage this type of collaboration to maximize efficiency and impact.

**8. Coordinate grant program guideline development and outreach with NRCS and other agencies funding Climate Smart Agriculture technical assistance and implementation**

AB 2377 states: “The department shall coordinate grant program guideline development and outreach with the Natural Resources Conservation Service of the United States Department of Agriculture.”[2] To fulfill that requirement, we ask that CDFA convene a meeting with NRCS’s leadership team in the state to discuss the opportunities AB 2377 presents for further coordinating Climate Smart Agriculture outreach and education for producers and conservation planning training TA providers.

In addition to NRCS, we recommend CDFA convene a meeting between the leadership and program staff from the Wildlife Conservation Board’s Climate Adaptation and Resiliency Program and the Coastal Conservancy’s Climate Ready Program, both of which have funded Climate Smart Agriculture projects and technical assistance, to explore opportunities for synergy between the programs’ investments.

We sincerely appreciate CDFA’s recognition of the value of TA to its Climate Smart Agriculture programs and look forward to reviewing and commenting on the draft RFP in April.

Sincerely,

Brian Shobe  
Associate Policy Director  
CalCAN

Jo Ann Baumgartner  
Executive Director  
Wild Farm Alliance

Devin Best  
Executive Director  
Upper Salinas - Las Tablas Resource  
Conservation District

Jeff Borum  
Soil Health Conservationist  
East Stanislaus Resource Conservation District

Rebecca Burgess  
Executive Director  
Fibershed

Dr. Cynthia Daley  
Director  
CSU Regenerative Ag Initiative

Jill Demers  
Executive Director  
Humboldt County Resource Conservation  
District

Jan Derecho  
Executive Director  
Ecological Farming Association

Rex Dufour  
Western Regional Office Director  
National Center for Appropriate Technology

Torri Estrada  
Executive Director  
Carbon Cycle Institute

Miguel Garcia  
Sustainable Agriculture Project Manager  
Napa County Resource Conservation District

Steve Haze  
District Manager  
Sierra Resource Conservation District

Kara Heckert  
California State Director  
American Farmland Trust

Sheryl Landrum  
Executive Director  
Resource Conservation District of Greater San  
Diego County

Dr. Chandra Richards  
Conservation Ecologist  
Resource Conservation District of Greater San  
Diego County

Lisa Lurie  
Executive Director  
Santa Cruz Resource Conservation District

Brandie Mack  
National Director & CEO  
The Butterfly Movement

Michael Meehan  
Policy Advisor  
Kitchen Table Advisors

Valerie Minton Quinto  
Executive Director  
Sonoma Resource Conservation District

Anna Olsen  
Executive Director  
Cachuma Resource Conservation District

Courtney Provo  
District Manager  
Mission Resource Conservation District

Margaret Reeves  
Senior Scientist  
Pesticide Action Network of North America

Paul Robins  
Executive Director  
Resource Conservation District of Monterey  
County

Dave Runsten  
Policy Director  
Community Alliance with Family Farmers

Nancy Scolari  
Executive Director  
Marin Resource Conservation District

Sigrid Wright  
Executive Director  
Community Environmental Council

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[1] FAC Div. 1, Ch. 3, Article 8.5, Section 570(b)(2)

[2] FAC Div. 1, Ch. 3, Article 8.5, Section 570(c)(1)(b)



May 24, 2019

California Department of Food and Agriculture  
1220 N Street  
Sacramento, CA 95814

**Re: AB 2377 Implementation**

To whom it may concern:

Thank you for the opportunity to share our comments on the Climate Smart Agriculture Technical Assistance Grants draft Request For Proposals. Thank you, also, for hosting the Listening Session in Salinas on May 20<sup>th</sup>, which I attended. This letter is a follow up to the comments made during that meeting.

1. Eligibility for organizations with districts: While we appreciate the intention that all farmers across California have access to assistance, requiring every applicant to work outside of their jurisdiction eliminates the ability of Resource Conservation Districts and other regional organizations to participate. This would eliminate about half of TA providers that have helped to make the CSA programs a success. For other rounds of the Climate Smart Agriculture programs, CDFA has made the contact information of all TA providers available, as well as the date and time of all workshops. Continuing to make this information publicly available is a good tool to ensure that everyone has access to services. RCDs often offer events and workshops, which are attended by people outside of their district. Because of the already existing network of RCDs, referring someone to a TA provider that is either in their district or closer proximity is easy and commonly done.

2. True cost of delivering the CDFA CSA Programs:

— Indirect costs

The San Mateo Resource Conservation District has a federally approved Negotiated Indirect Cost Rate Agreement of 32.19% that is based on an annual cost allocation plan. Notably, the California Department of Food and Agriculture itself has negotiated a rate of 38.44% rate to recover the Department's indirect costs from grants, contracts, and other agreements.<sup>1</sup>

Indirect costs are essential for delivering projects, and include items such as rent; insurance; work stations and meeting spaces; utilities; office supplies; IT support and software; administrative staff; bookkeeping and accounting; legal consultation and

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<sup>1</sup> [https://www.aphis.usda.gov/mrpb/fmd/downloads/CA\\_ICRA\\_SF15.pdf](https://www.aphis.usda.gov/mrpb/fmd/downloads/CA_ICRA_SF15.pdf)

review of contracts, labor practices, policies, etc.; development of financial, personnel, safety, and other policies; annual financial audits; staffing to prepare, notice, and support public Board meetings; other staff time that cannot be billed to specific projects, e.g. participation in this review and comment process, staff meetings, staff trainings, etc.; costs to comply with Division 9, the Brown Act, and other government codes that ensure our accountability and transparency. Negotiated Indirect Cost Rates are based on audited financials, which are then reviewed by the cognizant federal agency over the course of months. They are highly vetted and based on actual costs to operate as an organization. The grant program as currently proposed would limit our ability to recover our true costs, meaning that we would lose money by accepting the grant unless we were able to secure private donations or funding to deliver this CDFA program.

The recovery of indirect costs is a common and essential accounting practice at federal, state, and local levels. Indirect costs are defined by California's Office of the Controller in the December 2018 Edition of the Special District Uniform Accounting and Reporting Procedures<sup>2</sup> as "Those elements of cost necessary in the production of a good or service that are not directly traceable to the product or service. Usually these costs relate to objects of expenditure that do not become an integral part of the finished product or service, such as rent, heat, light, supplies, management and supervision (indirect costs/charges/expenses)."

— Commission based structure for Phase 1 activities:

The commission based structure for assisted and submitted applications is inadequate to fund the necessary time and resources need to provide high-quality individualized assistance, and does not provide CDFA with accurate information about the true costs of delivering these programs.

The currently proposed structure provides \$200 for each farmer or rancher who does not submit an application. This assumes that those that do not submit applications require little assistance. Our two grants to provide TA for the Healthy Soils Program has shown that this is not the case. TA providers are to receive \$400 for every application that is submitted. This commission based cost structure does not take into account individual assistance requirements of farmers or ranchers regardless if they apply, or the varying staff costs across the state and from organization to organization. Four hundred dollars may cover 14 hours of staff time for one organization and 6 for another. Additionally, with this current structure, there have been some instances where assistance we provided to a farm was minimal, but we were reimbursed for more than its cost. However, more common is that the actual cost of assisting an applicant costs more than \$400. In this current structure CDFA is overpaying for some assistance and underpaying for others. Reimbursing TA providers for the actual hours spent assisting applicants would not only support TA organizations by reimbursing their true costs, but also provide CDFA with accurate information about the actual cost of their programs.

— Conservation plans:

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<sup>2</sup> [https://www.sco.ca.gov/Files-ARD-Local/SPD%20Manual\\_2019.pdf](https://www.sco.ca.gov/Files-ARD-Local/SPD%20Manual_2019.pdf)

Conservation plans are given extra points in the application evaluation and have been mentioned by CDFA as being important for the selection of Climate Smart Ag practices. However, the TA reimbursement rates do not allow for the development of conservation plans. Conservation (and carbon farming) plans are property scale, comprehensive plans that identify opportunities to address natural resource concerns as well as enhance natural resources. The plans assess and address soil health, wildlife, animal and plant health (both wild and part of the ag operation), and water quality. Conservation plans make site specific recommendations for conservation practices that are based on soil, water, wildlife, and water data, coupled with information from landowners, agricultural producers, and other specialists. CDFA should continue to encourage conservation plan development to ensure that the practices covered through the Healthy Soils Program are best suited for the farm or ranch, but they should recognize and cover the actual costs of developing these plans.

Conservation plans can take up to 100 hours of staff time (depending on the size and complexity of the agricultural operation)- an essential one-time investment to create a whole property plan that maximizes conservation practices that will complement each other, improve the agricultural operation, add and/or enhance ecosystem services, and sequester carbon. Development of these plans is an essential component of providing conservation technical assistance to farmers and ranchers and should be covered by this grant program.

3. Work program and budget: The current draft of the grant program is more detailed, onerous, and prescriptive than many other state funding programs. Typical public funding programs list priorities for the funding and allow applicants to build a work program and budget that best meets the needs of their individual projects. It is up to the applicant to propose a program or project that has merit and will meet the requirements of the funder. The funder may accept or reject a proposal, but rarely does the funder so definitively prescribe how applicants will implement a program or project.

In just this year, the San Mateo RCD has over 90 grant agreements. When we accept a funding award, we sign a grant agreement and are contractually obligated to meet its deliverables and other terms. Based on the discussion on May 20<sup>th</sup>, CDFA staff explained that the current draft budget outline and cost allocation per year was an attempt to ensure that TA providers have enough funding throughout the grant period to meet the deliverables of providing pre-award assistance, and post-award assistance through year three. When organizations apply for grants and sign grant awards, they are contractually agreeing to deliver the project as proposed. While the intention of CDFA to break down the costs by year to guarantee that work continues through year three is understandable, the reality is that its unnecessarily prescriptive, and likely to constrain how services will be delivered.

The budget and cost structure as currently proposed are more detailed and prescriptive than any other grant agreement we have seen. In our experience the more line items included in a budget, leads to high administrative costs required to restructure budgets when there are inevitable changes that need to be made, especially when working with farmers and ranchers. Some examples of costs the CDFA expects applicants to be able to accurately project are "PowerPoint/Printing handouts for workshops", "Postage", "Facility rental for Workshop".

Without knowing how many solicitations there will be in each year, the number of applicants attending the workshops or requesting assistance, projecting these costs are difficult, and in cases when actual costs are different than projected costs for number of handouts, we will have to contact CDFA to reallocate funding from other line items. Grant budgets are typically aggregated into fewer categories, with expenses aggregated in a single line item. A simpler budget that allows for flexibility, which is necessary when working with agricultural producers and conservation practices, while grantees are contractually obligated to deliverables, would better serve the TA providers and CDFA. Please see attached examples.

Likewise, the proposed workplan is also onerous. It is impossible to know how many people will attend an event, will request assistance, how many will be rewarded funds and what type of post-award assistance they will require. Workplans typically include more general tasks, such as "outreach", and in the narrative of the grant application, applicants describe in more detail what that task will entail, and a timeline for the task. A workplan that is reflective of the needs of the region, without being constricting, will lead to better technical assistance for farmers and ranchers. Please see examples of more typical grant application workplans attached.

The current rigidity of the workplans and budget will lead to high administrative costs. When workplans and budgets must be amended, the amendment process requires time of the organization that could otherwise be spent delivering programs, takes administrative time of CDFA staff, and delays the work until amendments can be processed. Adopting workplans and budgets that are similar to other state grant programs will lead to more effective technical assistance and reduced administrative costs of TA providers and CDFA.

4. Sensitive information: One of the biggest barriers to farmers and ranchers participating in government sponsored beneficial programs is the fear of regulation. Many farmers and ranchers are uncomfortable sharing private information about their operations without knowing why the information is necessary. Understanding that those that receive TA or submit an application are tied into how CDFA can leverage the most funding support for the program, asking attendees of a workshop to provide sensitive information, like their address, ethnicity, or self-reporting as a socially disadvantaged farmer or rancher is not necessary, and will likely deter people from attending workshops, accurately reporting that information, and possibly following through with the program. Please remove the requirement for TA providers to report personal farmer and rancher information for those that attend workshops.

In conclusion, our recommendations for the Climate Smart Agriculture Technical Assistance Grants draft RFP are as follows:

- Allow RCDs and others to be eligible applicants by removing the requirement that TA providers area of work not be limited to a specific county or region.
- Allow for full reimbursement of the true costs of delivering CDFA's programs, including actual indirect rates and true cost of staff time using accepted standard accounting practices.
- Allow for the development of conservation plans as a tool to help farmers and ranchers maximize benefits of CSA practices to their operation and the environment.
- Structure the grant application to be like other public grant programs that allow applicants to submit a workplan and budget that best reflects the needs of their region, is flexible, and reduces administrative costs to the organizations and CDFA.
- Do not require workshop attendees to report personal information that is not necessary.

Thank you for considering our recommendations. Please feel free to reach out to me if you have questions.

Sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'A' followed by a series of loops and a long horizontal line extending to the right.

Adria Arko  
Program Specialist and Agricultural Ombudsman  
San Mateo RCD

[adria@sanmateoRCD.org](mailto:adria@sanmateoRCD.org)  
650-712-7765 x105

Note: Partner and landowner names have been removed for privacy.

unding agreement with Wildlife Conservation board

EXHIBIT B

## BUDGET

Task #	Project Task	WCB Funding	Non-State Match*	State Match*	Total Cost Per Task
1	Project Administration	\$28,417	\$36,000	\$5,015	\$69,432
2	Designs	\$734,960	\$17,773	\$109,988	\$862,721
3	Environmental Assessment and Permitting	\$64,980	\$14,774	\$45,958	\$125,712
	<b>TOTAL</b>	<b>\$828,357</b>	<b>\$68,547</b>	<b>\$160,961</b>	<b>\$1,057,865</b>

\*Non-State Match funding sources includes:

\*State Match funding sources include:

**SECTION 8 - BUDGET**

**8.01 Expenditure Summary**

The Grantor will provide an amount not to exceed \$160,382 as shown below in this Budget. The Grantee or their partners will provide up to \$38,803 in funds or in-kind services as cost share to complete tasks described in Section 6 - Project Statement: Objectives and Timelines. Accurate records of in-kind funds or services will be provided to the Grantor with the Final Report.

PERSONNEL SERVICES

LEVEL OF STAFF	TOTALS
Executive Director (1)	\$ 3,685
Finance Director (1)	\$ 3,672
Natural Resource Specialist (1)	\$ 16,200
Conservation Assistant (1)	\$ 10,800
Program Assistant (1)	\$ 5,610
Staff Benefits @ 20%	\$ 7,993
<b>Total Personnel Services</b>	<b>\$ 47,960</b>

OPERATING EXPENSES

SUBCONTRACTOR COSTS	\$ 98,300
(Responsible for selection of LWD, engineering, placement and oversight of LWD structures in channel; monitoring of structures)	
OTHER COSTS	
Tools and instruments	\$ 1,796
Mileage (@ \$0.56/mile)	\$ 627
LSAA application fee	\$ 1,352
<b><u>Subtotal Other Costs</u></b>	<b>\$ 3,775</b>
<b>Total Operating Expenses</b>	<b>\$ 102,075</b>
Subtotal (personnel & operating minus subcontractor & equipment purchase)	\$ 51,735

INDIRECT CHARGES

Administrative Overhead	
@ 20 % (max 20%) (Less Equipment & Subcontractor Costs)	\$ 10,347
<b><u>GRAND TOTAL</u></b>	<b>\$ 160,382</b>

**BUDGET**

**Project 5: Coastal San Mateo County Drought Relief Phase II**

Budget Category		Grant Amount	Cost Share: Non-State Fund Source (Funding Match)	Additional Cost Share	Total Cost
(a)	Direct Project Administration	\$177,430	-	-	\$177,430
(b)	Land Purchase/ Easements	-	-	-	-
(c)	Planning/ Design/ Engineering/ Environmental Documentation	\$215,405	-	\$75,755	\$291,160
(d)	Construction/ Implementation	\$1,007,165	-	\$473,818	\$1,480,983
<b>TOTAL</b>		<b>\$1,400,000</b>	<b>-</b>	<b>\$549,573</b>	<b>\$1,949,573</b>

Example of workplan:

**SCHEDULE**

Project 5: Coastal San Mateo County Drought Relief Phase II			
Category		Start Date	End Date
<b>Task (a)</b>	<b>Direct Project Administration</b>	<b>January-16</b>	<b>February-20</b>
Task 1	Project Management	January-16	February-20
Task 2	Labor Compliance	January-16	October-18
Task 3	Reporting	January-16	February-20
<b>Task (b)</b>	<b>Land Purchase/Easement</b>	<b>n/a</b>	<b>n/a</b>
Task 4	Not Applicable	n/a	n/a
<b>Task (c)</b>	<b>Planning/Design/Engineering and Environmental Documentation</b>	<b>December-14</b>	<b>November-18</b>
Task 5	Feasibility Studies	April-15	January-16
Task 6	CEQA Documentation	April-17	June-18
Task 7	Permitting	April-16	June-17
Task 8	Design	May-15	November-16
Task 9	Project Monitoring Plan	March-16	January-17
<b>Task (d)</b>	<b>Construction/Implementation</b>	<b>March-16</b>	<b>November-19</b>
Task 10	Construction Contracting	March-16	October-19
Task 11	Construction Administration	March-16	November-19
Task 12	Construction/Implementation Activities	March-16	October-19

Grant proposal to State Coastal Conservancy. Workplan and budget.

**GRANT APPLICATION – PRELIMINARY BUDGET AND SCHEDULE**

In the budget matrix below, relist the tasks identified in #4 above and for each provide: 1) the estimated completion date for the task, 2) the estimated cost of the task, and 3) the funding sources (applicant, Conservancy, and other) for the task. The table will automatically sum the totals for each row and column. To do this, highlight the whole table and hit F9.

Task #	Task	Completion Date	REQUEST	MATCHING FUNDS		Total Cost
			Coastal Conservancy	Other CA State Funds	Other Non- State Funds	
1	Project Management	09/2022	\$17,573	\$3,000	\$300	\$20,873
2	Irrigation System Assessment and Design	05/2020	\$95,903		\$4,500	\$100,403
3	Project Permitting	05/2020	\$32,248	\$2,000		\$34,248
<b>TOTAL</b>			<b>\$145,725</b>	<b>\$5,000</b>	<b>\$4,800</b>	<b>\$155,525</b>

**Budget Justification**

Please provide a brief narrative explanation of the budget that explains and justifies the costs. The purpose of the narrative is to provide background and detail to explain the costs in the budget, including the source of the estimates. It is helpful to know if the budget includes administrative or indirect costs or contingencies and those amounts. If you have an engineer’s estimate, providing that will suffice.

**Task 1 Administration:**

- Includes funding for the RCD to coordinate project activities, develop and manage contracts, prepare invoices and progress reports and develop the final report (\$16,601). The hourly rates for RCD staff include wages, fringe benefit and the federally approved indirect rate.
- Mileage activities for RCD staff is estimated at \$972 based on the current federally approved mileage rate of \$0.545/mile

**Task 2 Design costs includes:**

- Funding for RCD staff to manage and participate in irrigation assessments, development of project designs and monitoring and maintenance plan (\$12,803)
- Funding for an irrigation specialist to conduct irrigation assessments with RCD staff at three locations (\$1,550 at 3 sites for a total of \$3,100)
- Engineering services at two sites at an estimated \$40,000 per site (based on recent RCD projects of similar size and nature) for a total of \$80,000).

**Task 3** Environmental assessment and permitting costs includes:

- Funding for RCD staff to conduct biological assessments, assist in permit development, develop CEQA documentation (\$15,998.48).
- Funding for \_\_\_\_\_ to assist the RCD in reviewing permits, CEQA documents and biological assessments (\$2,250).
- Funding for \_\_\_\_\_ to assist in design review, develop water availability analysis reports and water rights permits (an average of \$7,000 at each of two sites for a total of \$14,000).

**6. Specific Tasks.** Identify the specific tasks that will be undertaken and the work that will be accomplished for each task.

#	Task Name	Description
1	Project Management	Under this task, the San Mateo RCD will take the lead in overall project management, including managing contracts and subcontracts; coordinating with partners, landowners and agencies; writing and submitting progress reports and invoices.
2	Irrigation System Assessment and Designs	Under this task, the RCD and _____ . will assess irrigation system to confirm estimated water demand and develop recommendations for irrigation system improvements. The RCD will also solicit proposals from engineer and design firms to investigate site suitability and design water systems.
3	Project Permitting	The RCD, _____ will prepare CEQA, 1600s (both sites), Water Rights _____ , Coastal Development Exemption (use NOAA RC's consistency determination with the Coastal Commission), and other necessary permits. Once implementation funding is secured, the RCD will submit permits.

**7. Work Products.** List the specific work products or other deliverables that the project will result in.

- 1) Project Management
  - a. Quarterly progress reports and invoices
  - b. Final Report
- 2) Irrigation System Assessment and Designs
  - a. Summary memo of irrigation system improvement recommendations
  - b. 100% design documents
    - i. irrigation systems
    - ii. storage systems
  - c. Monitoring and Maintenance Plan
- 3) Project Permitting
  - a. Biological Assessment report for each (2) project site
  - b. Prepare necessary environmental compliance (CEQA) and permit documents for each project site.
- 4) Expenses
  - a. Mileage at current federal/state rate

## Proposal to NRCS: workplan and budget.

San Mateo County Resource Conservation District

### Statement of Work

The vast majority of the San Mateo RCD's funding comes from grants that do not offer flexibility to respond to community needs. The San Mateo County RCD has had 4 contribution agreements with the NRCS over the last 13 years. The agreements have provided funding that enables RCD staff to respond to NRCS requests for technical assistance and to work on conservation projects that are necessary, but do not have grant funding, such as workshops, or bringing in consultants to backfill NRCS staffing deficiencies. The Contribution Agreements have led to the development of a stronger partnership between our organization and the NRCS, extended our reach to our conservation partners, and increased our customer base. Our organization has always met or exceeded the goals and deliverables of these agreements.

The proposed deliverables for this Agreement are as follows:

- Deliverable 1 – Technical assistance to 4 landowners to increase water quality (roads, LID, horses, etc.)
- Deliverable 2 – Technical assistance to 4 landowners for increased water storage and/or water use efficiency (irrigation efficiency, ag ponds, etc).
- Deliverable 3 – Technical assistance to 4 landowners with the primary objective of improving soil health (carbon farm plans, cover crops, etc.)
- Deliverable 4 – Technical assistance to 4 landowners with the primary objective of improving wildlife/pollinator habitat, including an outreach/demonstration project (streams, hedgerows, etc).
- Deliverable 5 – Outreach to at least 6 farmers/ranchers to educate them about NRCS conservation planning and financial assistance program opportunities.
- Deliverable 6- Biology assistance on at least 4 farms/ranches in support of NRCS conservation planning and financial assistance programs.
- Deliverable 7- Technical assistance to at least 4 landowners with the primary objective of invasive species management.

### Budget Narrative

The original proposed budget for the deliverables included in this agreement was \$50,000 (\$25,000 from the NRCS, and \$25,000 in matching funds.) Additional funding is being requested for \$100,000 (\$50,000 NRCS, \$50,000 in matching funds), and to extend the Agreement by two years.



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## Carbon Cycle Institute



May 24th 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 (CCI), CARCD thanks CDFA and the OEFI staff for their dedication to conservation and agriculture. We greatly appreciate all of your programs for the difference they are making to our farmers and ranchers and our environment.

We also appreciate the opportunity to comment on the Technical Assistance program legislated by AB 2377. We share your belief that technical assistance (TA) is vital to promote, enhance, and strengthen CDFA's Climate-Smart Agriculture programs (CSA Programs) and the overall resilience and adaptability of California's working lands. We are grateful that we are aligned on the need for these programs to exist for landowners and managers in order for California to reach our climate change mitigation and resiliency goals. The CDFA programs are an important mechanism to promote and implement agricultural practices that aid in the sustainability and vitality of California's agriculture.

Technical assistance is key to the success of implementation of these programs on-the-ground. High quality and consistent technical assistance leads to effective projects. If we want our investment in conservation practices to

California Association of Resource Conservation Districts  
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be implemented well, it requires an investment in solid technical assistance that is long-term, reliable, scientifically-sound, and accountable. CARCD and its partners are continuing to develop the capacity for delivery of highly effective climate-smart agricultural focused TA at scale through platforms such as our Carbon Farming Network.

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.

### **Recommendations**

Below is the full list of recommendations for the Draft RFP of the Technical Assistance Program. Following this list, the recommendations are deconstructed and elucidated. Please consider the following recommendations:

1. Elimination of the phased program framework and adoption of a standard (more flexible) grant program.
2. Remove any designation or stipulation of service area to be covered by TA organizations.
3. Increase indirect rate and accept any federal or state approved indirect rates. Allow applicants to apply for the full \$60,000 without commission reimbursement.
4. Omit the requirement for TA providers to report farmer and rancher personal information.
5. TA Program awards contracted and finalized at least 3 months prior to CSA Program open solicitation.

#### **1. Program Framework: Adopt a standard grant structure and eliminate the commission and phased program framework.**

CARCD recommends adoption of a standard grant program structure instead of a phased program framework and the commission-based reimbursement system. The two-phase system is unnecessarily complex and not conducive to efficient budgeting, planning, and reporting. Allowing applicants the flexibility to structure their work plan and budget, integrating pre-award and post-award activities, would reduce administrative burden, and allow for easier accommodation of the variable needs from farmers and ranchers and changing circumstances on the ground. More flexibility (by removing the two-phase structure) will allow individual RCDs the ability to autonomously make the best decisions within the program guidelines. RCDs would be able to tailor distribution of awarded funds as most appropriate for their region and local programmatic interest and needs.

CDFA has many other grant programs that operate with a more standard grant structure, such as the Specialty Crop Block Grant and the Climate-Smart Agriculture programs this program supports.

Specific drawbacks of the two-phase system include:

1. The base payment of \$5,000 in Phase 1 does not recognize the scope, necessary time, and costs incurred for effective outreach. Outreach is critical to enrolling strong projects that have an ability to make a big impact, and the type of outreach and application assistance required and outlined by CDFA takes time and money. TA providers will also need to learn any new updates on the CSA programs and application



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requirements. Without changing this payment structure, technical assistance providers may not be able to engage the best projects with the biggest impacts.

2. The commission-based structure for assisted and submitted applications is inadequate to fund the time and resources needed to provide high-quality individualized assistance. The CSA Program applications require intensive administrative, technical, and narrative responses. This frequently requires on-site visits and in-depth conservation planning to generate a competitive and complete application. The CSA Program prioritizes projects that have conservation plans; however, conservation plans cannot be developed under the commission based reimbursement because the reimbursement rate is orders of magnitude lower than the true cost of developing conservation plans with farmers and ranchers. Working under the drafted conditions doesn't equate to effective technical assistance.
3. The potential amount of \$15,000 over the \$5,000 base payment is unrealistic. Thirty-eight applications would have to be submitted to each the Healthy Soils Program (HSP) and the State Water Enhancement and Efficiency Program (SWEEP) to reach the full \$20,000. For the past seven years of the CSA Programs, no CDFA-registered technical assistance provider has assisted in submitting that many applications in one solicitation. RCDs have reported typically assisting 2-7 applicants through submission per program and have reported working at a loss through this current system. Given the potential amount of funding available and the average number of submitted applications, these funds would be better utilized if the applying RCD is able to allocate it to the appropriate activity and still not compromise the quality of TA and number of assisted applications.
4. The funding allocations do not allow for regional variation of costs including local interest, crop type prevalence, or standard of living costs. Recognizing the different needs in different agricultural regions is crucial for creating accurate organizational budgets, stable staff capacity, and long-term partnerships. While we share your commitment to these practices and programs, we cannot participate at a loss.
5. The Phase 1 funding cap does not easily allow for novel and targeted outreach to socially disadvantaged farmers and ranchers. The funding limitation hinders the ability to hire translators and/or interpreters. It also fails to support the time and attention it takes to build trust with growers. This often takes more time when working with language or cultural barriers.

The scored budget and activity plan required in the TA Program application and subsequent reporting are sufficient to ensure transparency and competition for most cost efficient uses of awarded funds without having the need of designated activities and funds through "Phase 1" and "Phase 2".

The overall complexity of the program will cost the agency more than the provisions are aimed to save. By being overly prescriptive, the cost of compliance, reporting, applications, documentation on the part of the TA provider and, in turn, the review, oversight, documentation, and compliance monitoring on the part of CDFA, will far outweigh any potential savings that could be gained particularly at such minor amounts of grant funding.

RCDs are experts at actualizing their mission - providing technical assistance - and have successfully partnered and contracted directly with State and Federal agencies for over seven decades. We understand how to create work plans that have multiple phases, and know how to collaboratively adjust those plans to match the needs of the funder. RCDs are public agencies with high ethical standards for documentation and reporting, as well as financial management. CARCD is confident that the RCDs will continue to operate in full transparency, and



organize and allot funds properly for their unique operations. RCDs have expertise in providing technical assistance through their daily and decade's worth of experience and are able to anticipate funding needs.

RCDs want to provide effective and efficient technical assistance to advance CDFA's goals, but they need adequate funding levels and programmatic flexibility to do so. It is critical that RCDs build their own budgets based on the unique TA and agricultural needs of their regions.

2. **Program Requirements and Eligibility: Remove the program requirements of serving producers in multiple counties.**

The draft guidelines currently require that TA providers be able to serve farmers and ranchers in multiple counties. The requirement of serving in more than one county, severely limits RCDs eligibility to this program. RCDs are special districts under Division 9 of the Public Resources Code. This gives RCDs both autonomy, local representation, and defined jurisdictional boundaries. As currently drafted, the guidelines eliminate RCDs as eligible applicants to this program.

RCDs were created to provide technical assistance to landowners and managers, promote conservation practices (CPs), connect producers with funding mechanisms for CP implementation, and provide a wealth of supporting activities. As such, RCDs have been essential in the delivery of CDFA programs. Excluding RCDs that serve a single county would greatly lessen the effectiveness of climate-smart agricultural practices. Currently, over 50% of CDFA's current CSA Program TA providers are RCDs, many of which have a countywide jurisdiction. RCDs are uniquely effective because of their intimate knowledge of their communities, ecosystems, and local permitting processes. Requiring them to work outside their jurisdictional boundaries and areas of expertise limits their efficacy.

RCDs actively leverage relationships that have been cultivated over decades to make conservation happen on the ground while honoring the unique needs of the people and places where they work. RCDs also recognize the value and urgency of working collectively to address challenges like climate change and building resilient communities since these issues extend far beyond district boundaries. RCDs have been working with farmers, ranchers, and foresters for close to a century to implement soil, land, and conservation practices, many of which reduce and sequester greenhouse gasses. For these reasons and many others, it will be detrimental to California's agricultural communities if RCDs are unable to participate due to service area boundary considerations.

3. **Grant Awards: Increase indirect rate, accept any federal or state approved indirect rates. Allow budgeting at the maximum \$60,000 award available for any mandated and optional activity.**

CARCD and the RCDs are enthusiastic about dedicated TA funding to help implement climate resilience conservation practices. However, there are funding limitations that limit the applicability and success of this program.

**Extend the \$60,000 maximum award amount between both pre- and post-award activities.**

CARCD is appreciative of the many important TA activities in the draft guidelines. However, given the mandatory scope of work, the current award amount of \$45,000 (baseline) for both pre- and post-award activities is not sufficient for providing exemplary and thorough TA. Allow for the activity planning and budgeting up to



the full \$60,000, not based on the expected number of submitted applications. This amount is adequate to provide comprehensive services per solicitation.

### **Indirect Rate Increase**

Increasing the indirect rate to a minimum of 20%, and accepting any federally- or state-approved indirect rates helps ensure that technical assistance providers don't incur a loss by partnering with the Department on this important effort.

CARCD acknowledges and appreciates the immediate increase to 15% from 10% after the April 18<sup>th</sup> Environmental Farming Act Science Advisory Panel (EFA SAP) meeting. However, 15% is still lower than the majority of RCD's indirect costs; the overwhelming majority of RCD's have indirect rates above 20%, and many are closer to or above 30%. Notably, CDFA has a federally-approved indirect rate at 38.44%<sup>1</sup>. We are strongly committed to the program and to partnering with CDFA; however, we aren't able to operate at a loss with no place to recover those funds.

The indirect rate of 20% strongly favors organizations that have significant general operating funds from other sources, an asset that most RCDs do not have. These full costs include necessities such as rent, utilities, administrative staff compensation, and office supplies, without which it would be impossible to carry out grant-funded program work such as planning and implementation.

Some RCD's have a federally negotiated indirect cost rate varying from 22%-35%. This rate does not represent "extra" funds, but rather a well-documented set of costs that are necessary to the grant-funded work. The negotiated indirect cost rate agreement requires an allocation of these costs evenly across all grant awards, which means that when a state agency does not honor the same indirect cost rate, money is lost on that state grant. We would assert that any work worth funding through a grant program is worth funding at the full cost of that work, rather than at a reduced.

#### **4. Protect Farmer and Rancher Privacy: Omit the requirement of TA providers to report farmer and rancher personal information.**

One of the biggest barriers to farmers and ranchers participating in government-sponsored beneficial programs is the fear of regulation. CDFA should remove the requirement for TA providers to report personal farmer and rancher information. Phase 1 activities mandate that personal information for each individual inquiring about assistance must be recorded. CDFA will receive that information from each farm/farmer that submits an application to a CSA program. The information is not necessary to the successful implementation of the programs. A trusting relationship between producer and TA provider is essential for future endeavors and inquires. RCDs build strong relationships by demonstrating and valuing producer privacy through our voluntary, non-regulatory approach.

#### **5. Ensure sufficient time between programs: Ensure TA Program awards are contracted and finalized at least 3 months prior to CSA Program open solicitation. CSA Program solicitation guidelines available to TA providers prior to opening the solicitation period.**

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<sup>1</sup> [https://www.aphis.usda.gov/mrpb/fmd/downloads/CA\\_ICRA\\_SF15.pdf](https://www.aphis.usda.gov/mrpb/fmd/downloads/CA_ICRA_SF15.pdf)



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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. The TA organizations need sufficient time to prepare to provide comprehensive services to producers on these specific programs. That includes, reviewing and understanding new program and application changes, determining staffing levels, updating and/or creating new outreach materials, sub-contracting translators and/or interpreters, locating workshop venues, initiating outreach activities *prior to* the start date of the CSA Programs solicitation periods, in order to allow sufficient time for assisting growers with their applications during the solicitation period, etc.

**Aspects to Maintain**

CDFA incorporated aspects into the RFP that we believe are important for programmatic success. Please maintain the following list:

- 25% of program-wide awarded funds to socially disadvantaged farmers and ranchers.
- Exclusion of TA providers requiring producers to use specific brands or contractor products
- Inclusion of project design, conservation plans, and irrigation plans as an eligible activity. This will be financially possible with the withdrawal of the commission based structure.

In summary, we make the following recommendations:

6. Elimination of the phased program framework and adoption of a standard (more flexible) grant program.
7. Remove any designation or stipulation of service area to be covered by TA organizations.
8. Increase indirect rate and accept any federal or state approved indirect rates.
9. Omit the requirement for TA providers to report farmer and rancher personal information.
10. TA Program awards contracted and finalized at least 3 months prior to CSA Program open solicitation.

We appreciate your consideration of the recommendations presented. CARCD also wants to remind CDFA of the grander partnering potential that we have with CDFA because of our status of special districts within the State. It would be advantageous to all parties, RCDs, CDFA, and the producers of California, to contract TA non-competitively with RCDs individually or through CARCD.

RCDs were created over seventy years ago to be the local, technical assistance agency carrying out programs of this very nature, promoted by the USDA Soil Conservation Service. Today, RCDs are still readily fulfilling this role. RCDs are Special Districts of the State of California under Division 9 of the Public Resources Code, and are set up under California law to be locally-governed agencies that are subject to the Brown Act. As such, RCDs combine the accountability and transparency of a public agency with the flexibility and non-regulatory approach of a non-profit organization. State contracting rules allow for RCDs, as state entities, to contract directly with state agencies, avoiding a tedious, competitive application process for both the applicant and grantor.

The structure of 96 RCDs nested in a statewide network and association that ties in directly to the needs of partners and statewide goals, making the RCDs critical to the success of conservation programs in California. Because of all the attributes mentioned above, RCDs are nimble, flexible, and locally specific agents of change that are able to conduct outreach, raise interest of producers in state programs, and implement conservation in places where it doesn't otherwise happen, furthering the actualization of statewide conservation goals.

RCDs are accountable, trusted experts in the field. CARCD encourages CDFA to work with these local community structures. CDFA has authorization to make selections on the entities that conduct programmatic work on the ground without a competitive process. The system of RCDs has been designed to provide effective,



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accountable on the ground assistance at the local level. Utilizing these existing structures is the best and most effective and fiscally responsible way to get lasting results.

Once again, CARCD sincerely thanks the CDFA OEFI team for interpreting the legislative language, drafting this initial Technical Assistance Program Request for Proposal draft guidelines, and graciously accepting our feedback through this public comment period. We look forward to our continued partnership and collaborative efforts to increase climate smart agriculture practices throughout California.

Sincerely,

Karen Buhr, Executive Director

California Association of Resource Conservation Districts

Torri Estrada  
Executive Director  
Carbon Cycle Institute

Kellyx Nelson  
Executive Director  
San Mateo RCD

Anna Olsen  
Executive Director  
Cachuma RCD

Lisa Lurie  
Executive Director  
RCD Of Santa Cruz County

Sheryl Landrum  
Executive Director  
RCD of Greater San Diego County

Dr. Chandra Richards  
Conservation Ecologist  
RCD of Greater San Diego County

Curtis Ihle  
Interim Executive Director  
Humboldt County RCD

Nancy Scolari  
Executive Director  
Marin RCD

Devin Best  
District Manager  
Upper Salinas-Las Tablas RCD

# Coastal Monitoring Plan:

## Salmon & Steelhead Population Monitoring in Santa Cruz and San Mateo Counties



Maryna Sedoryk

Pacific States Marine Fisheries Commission  
California Department of Fish and Wildlife  
[msedoryk@psmfc.org](mailto:msedoryk@psmfc.org) (831) 469-1728



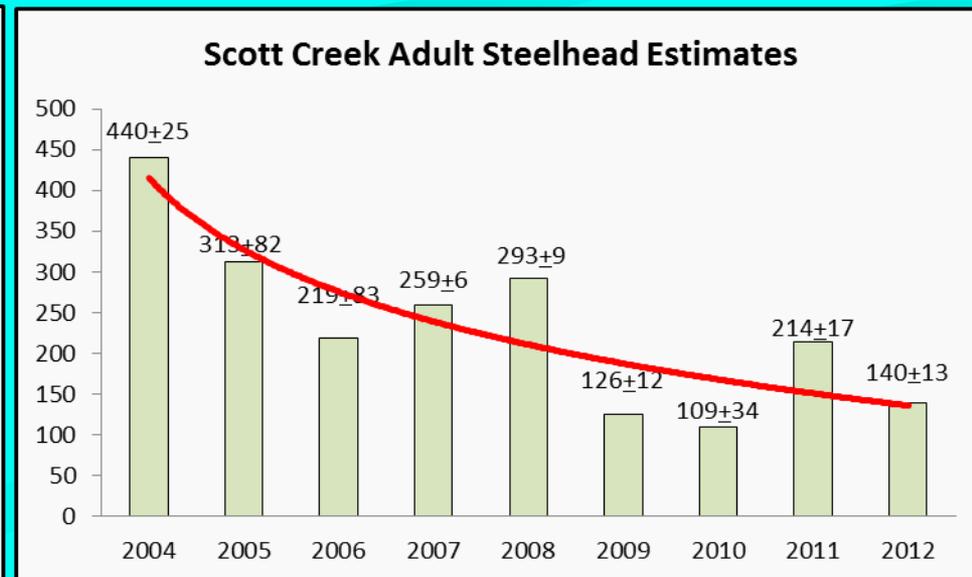
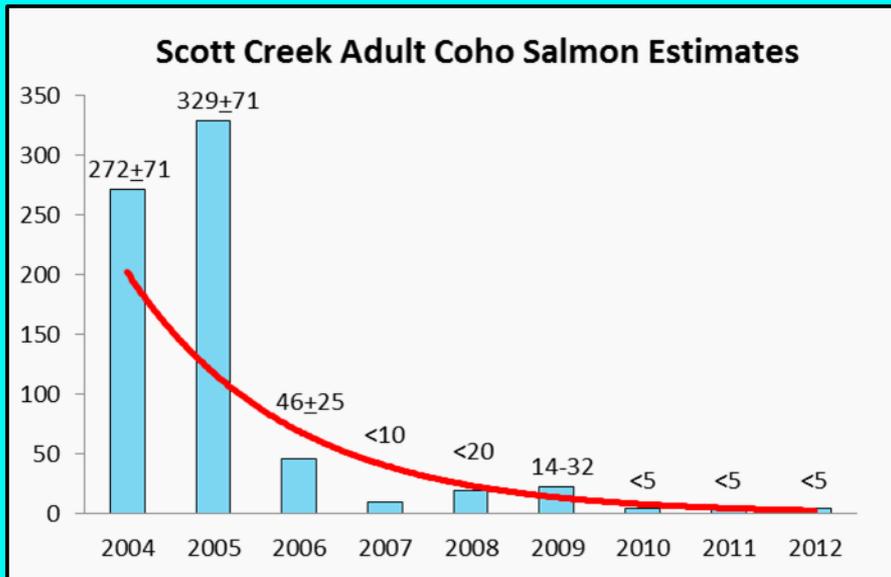
# Overview

- Why do we need the Coastal Monitoring Plan?
- What is the CMP?
- Where and how does monitoring occur?
- How is the data used?
- How can you help?



# Why do we need the CMP ?

- Declining Populations – Listed as Threatened/Endangered by US and CA Endangered Species Act
- Incomplete Data – historical data does not cover all watersheds
- Climate Change – Changes in temperature, flow, and behavior



# Why do we need the CMP ?

Santa Cruz Diversity Strata - Spawner Abundance Targets			
Watershed	Coho Salmon		Steelhead
	Downlisting	Delisting	Delisting
San Gregorio	682	1363	1700
Pescadero	1150	2300	2200
Gazos	140	279	73-148
Waddell	157	313	500
Scott	255	510	700
San Vicente	53	105	32-66
San Lorenzo	1900	3800	3200
Soquel	561	1122	1800
Aptos	466	932	1000

Source : CCC Coho Recovery Plan (2012); Coastal Multispecies Recovery Plan (2016)

# What is the CMP ?

State-wide plan to monitor California salmonid populations

## Northern Area

Chinook Salmon  
Coho Salmon  
Steelhead

## Southern Area

Steelhead



# CMP Objectives

1. **Create statewide monitoring framework**
2. **Regional Population Estimates\***
  - Status – how many are here now
  - Trends – change in population over time
3. **Spatial Structure Estimates\***
  - Where are the fish?
4. **Life Cycle Monitoring Stations**

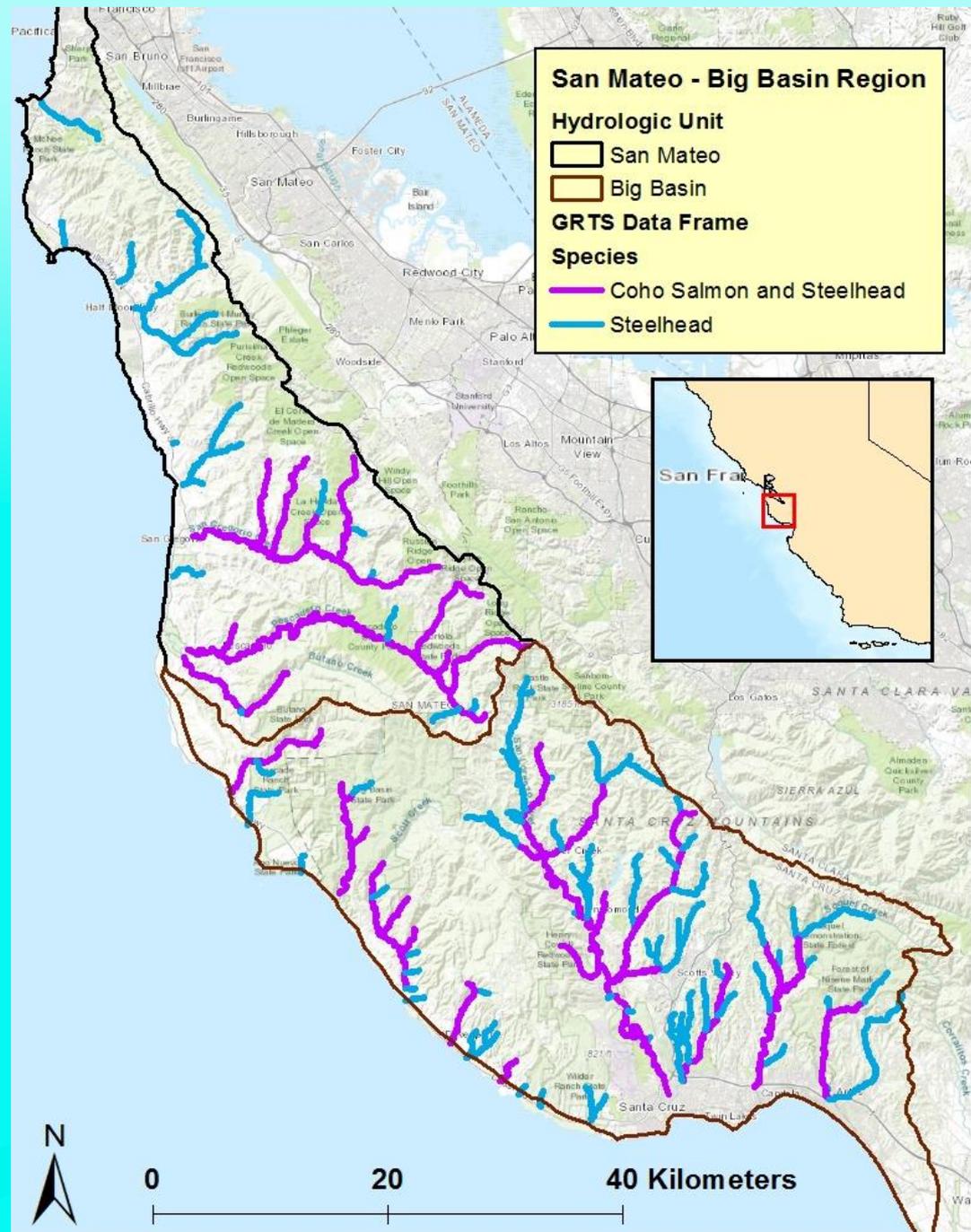
# Where does monitoring occur?

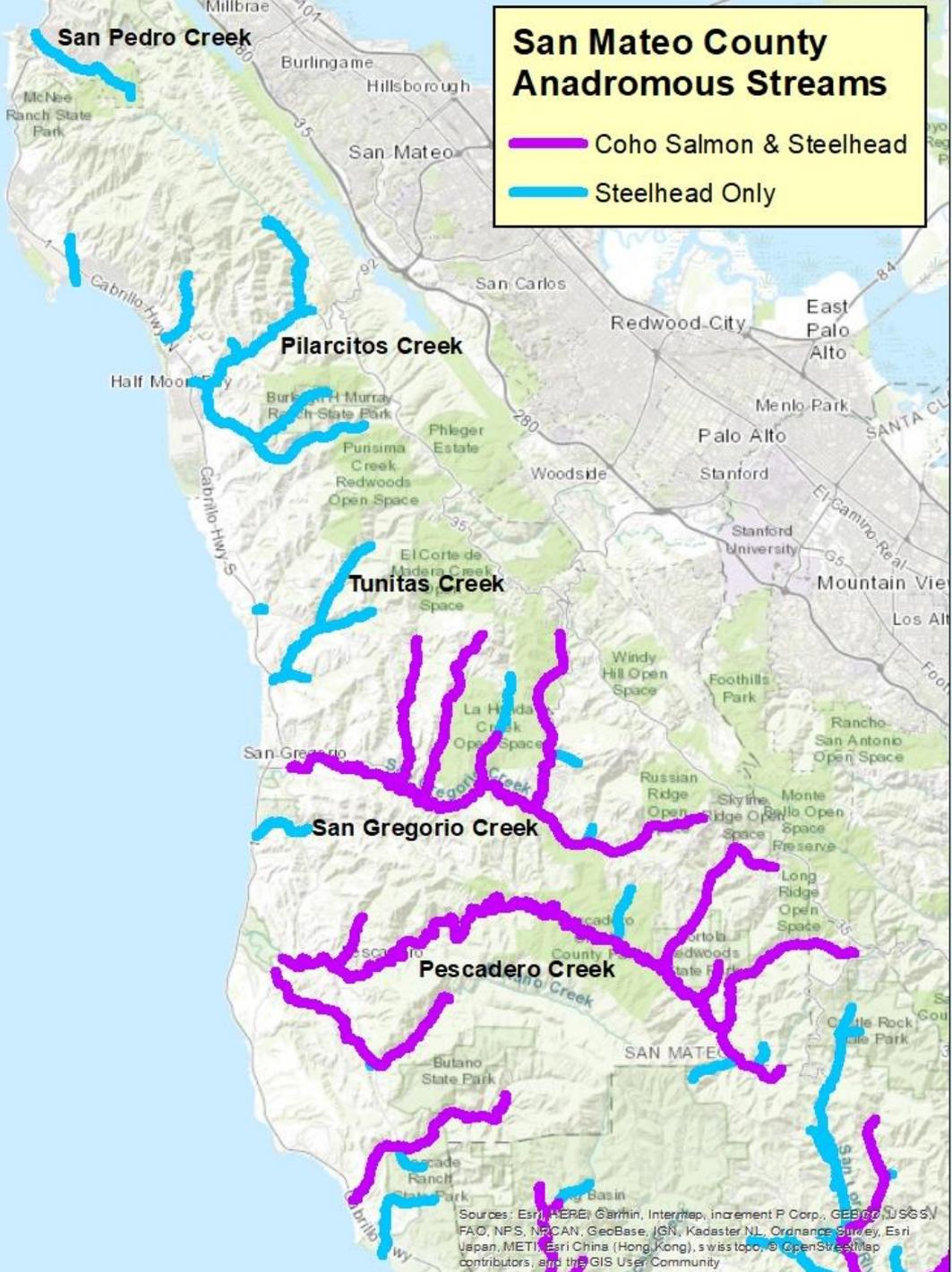
## San Mateo County

- San Gregorio Creek
- Pescadero Creek
- Gazos Creek

## Santa Cruz County

- Waddell Creek
- Scott Creek
- San Lorenzo River
- Soquel Creek
- Aptos Creek
- And more!

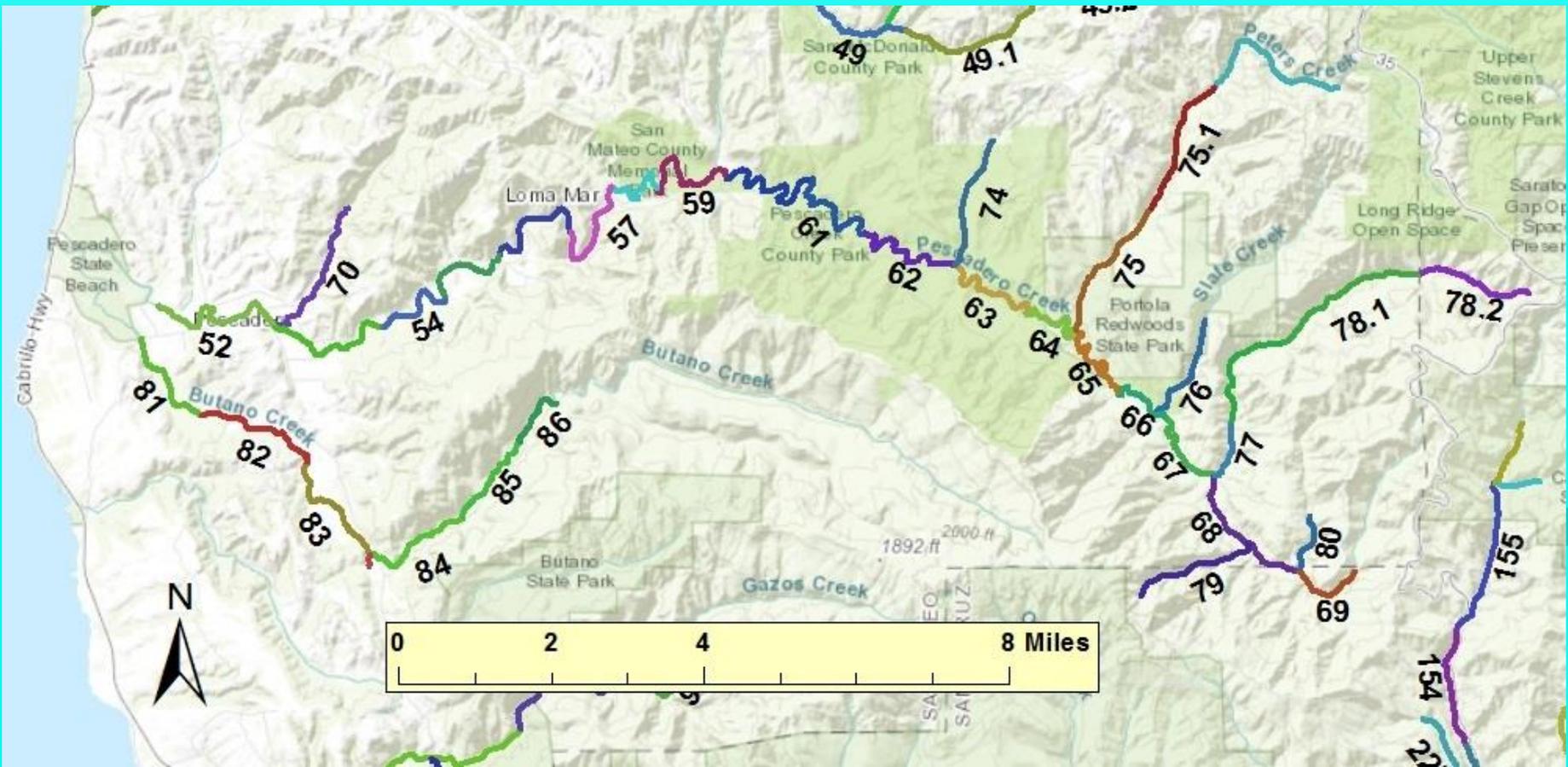




# San Mateo County Creeks & Tributaries

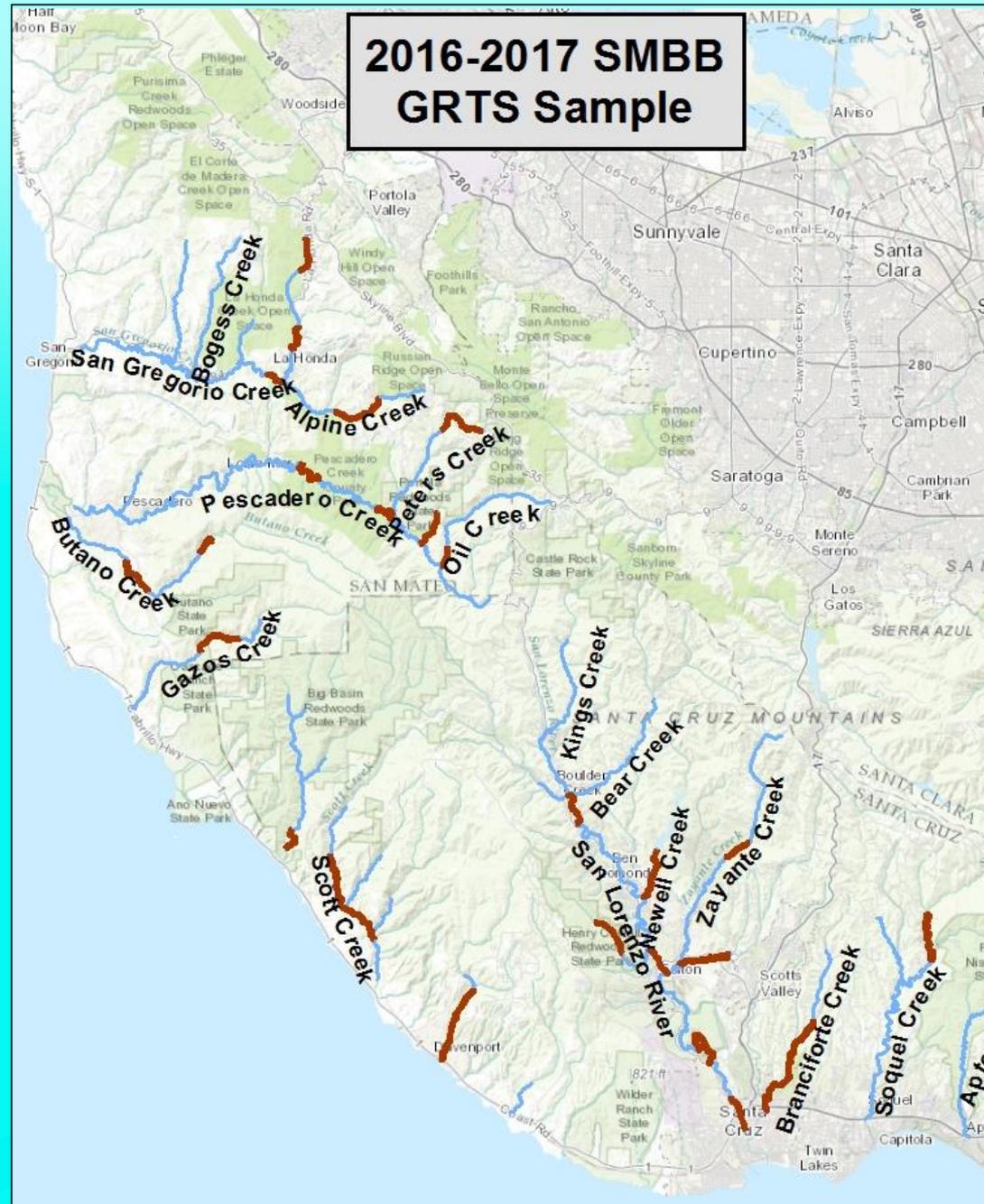
# Methods: How is monitoring work completed?

- Determine Survey Locations
- Contact Landowners
- Adult Spawning Surveys
- Juvenile Snorkel Surveys



# Determine Survey Location

- Random & spatially balanced selection
- 30 stream sections per year
- ½ - 2 miles per section
- Coho salmon is current focus



# Contact Landowners



## PACIFIC STATES MARINE FISHERIES COMMISSION

### **Provisional Landowner Access Agreement Pacific States Marine Fisheries Commission 151 McAllister Way Santa Cruz, CA 95060**

#### **Access/Entry Agreement Big Basin/San Mateo Regional Area Salmonid Monitoring Surveys**

##### **I. PURPOSE**

The following agreement details requirements of both the landowner and the Pacific States Marine Fisheries Commission regarding the Big Basin/San Mateo Regional Area Salmonid Monitoring Surveys. Said properties are located throughout San Mateo and Santa Cruz counties on the west side of the Santa Cruz Mountains.

I, \_\_\_\_\_ (here on called **Landowner**) am aware that the Pacific States Marine Fisheries Commission has a California Department of Fish and Wildlife (CDFW) Fisheries Restoration Grant to conduct adult salmon and steelhead spawning surveys and juvenile spatial structure monitoring surveys ("snorkel surveys"). The purpose of these surveys is to monitor the long-term status and trends of the salmon and steelhead populations in coastal San Mateo and Santa Cruz counties. The project has been explained by Maryna Sedoryk and the Landowner supports the goals of the project.

##### **II. ACCESS PERMISSION**

The Landowner hereby grants Pacific States Marine Fisheries Commission representatives' permission to wade stream channels owned by the Landowner to perform fisheries surveys. Access shall be limited to those portions of the Landowner real property where actual monitoring work is proposed to be performed and

# Adult Spawning Surveys

- November 1 to March 31
- Repeating surveys
- Count all fish & redds observed





Redd in Pescadero Creek



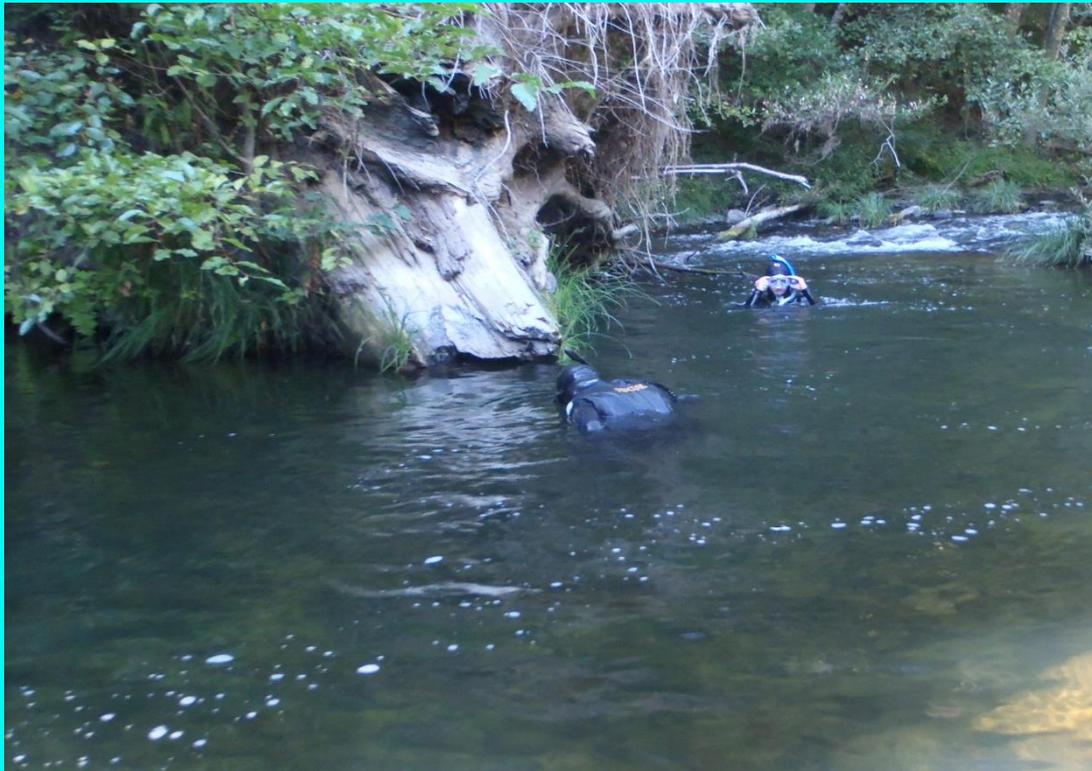
Surveyor Redd Flagging





# Juvenile Snorkel Surveys

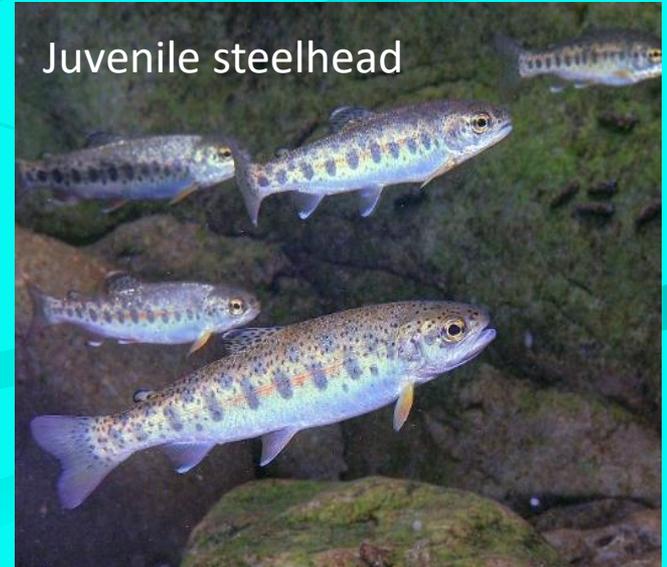
- July – October
- Surveyed once
- Count all juvenile coho and steelhead observed



Juvenile coho



Juvenile steelhead







# Results

## How does this information help?

Monitor recovery of listed species

Provide data to inform fisheries management decisions



# Results

Coho salmon observations during monitoring surveys:

- Soquel Creek
- San Lorenzo River
- San Vicente Creek
- Scott Creek
- Waddell Creek
- Pescadero Creek

\*Past season reports available by request



# You Can Help

Support stream research and restoration

Our greatest challenge is access  
to streams on private property

Protect the stream environment from  
pollution, dumping, and poaching

Report Anonymously: **1-888-334-CALTIP**

# Future Monitoring Goals

- Past surveys show: potential for increased fish production
- Currently ongoing or proposed: improvements to stream and lagoon conditions
- Future: Interest in expansion to include all steelhead habitat. Project funding is pending.



**Thank you for your  
interest and support**



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## San Mateo Resource Conservation District DRAFT FY 2020 Financial Budget

	FY19		FY 20	Variances	Notes
	Budget	Projected	Budget		
<b>REVENUE</b>					
<u>Program Revenue</u>					
Agricultural Ombudsman	\$41,657	\$66,834	\$44,588	(\$22,246)	
Climate Mitigation and Adaptation	\$117,315	\$88,562	\$197,856	\$109,294	
Conservation Technical Assistance	\$48,252	\$210,700	\$179,568	(\$31,132)	
Erosion and Sediment Management	\$678,307	\$848,570	\$640,084	(\$208,486)	
Fire and Forestry	\$0	\$0	\$239,040	\$239,040	
Habitat Enhancement	\$1,269,292	\$1,625,114	\$8,289,785	\$6,664,671	
Santa Cruz Mountains Stewardship Network	\$467,304	\$226,820	\$442,680	\$215,860	
Water Resources & Conservation	\$4,348,724	\$3,955,046	\$2,569,066	(\$1,385,980)	
Water Quality	\$253,439	\$214,851	\$272,634	\$57,783	
Billing Rate Adjustments			\$50,000		
<b>Subtotal Program Revenue</b>	<b>\$7,224,290</b>	<b>\$7,236,498</b>	<b>\$12,925,301</b>	<b>\$5,638,803</b>	
<u>Other Revenue</u>					
County Contributions	\$125,000	\$125,000	\$200,000	\$75,000	
Individual Contributions	\$10,000	\$27,784	\$10,000	(\$17,784)	
Interest Income	\$500	\$1,836	\$500	(\$1,336)	
Misc. Income	\$0	\$22,886	\$0	(\$22,886)	
Property Tax	\$60,000	\$108,799	\$65,000	(\$43,799)	
Service Fees	\$10,000	\$0	\$0	\$0	Getting rid of this category.
<b>Subtotal Other Revenue</b>	<b>\$205,500</b>	<b>\$286,306</b>	<b>\$275,500</b>	<b>(\$10,806)</b>	
<b>Total Revenue</b>	<b>\$7,429,790</b>	<b>\$7,522,804</b>	<b>\$13,200,801</b>	<b>\$5,627,997</b>	
<b>EXPENSES</b>					
<u>Operating Expenses</u>					
Personnel (Salaries & Fringe)	\$ 1,076,009	\$928,449	\$ 1,654,251	\$ 725,802	
Other	\$191,750	\$161,236	\$ 323,000	\$ 161,764	
<b>Subtotal Operating Expenses</b>	<b>\$1,267,759</b>	<b>\$1,089,685</b>	<b>\$1,977,251</b>	<b>\$887,566</b>	
<u>Program Expenses</u>					
Agricultural Ombudsman	\$800	\$2,333	\$600	(\$1,733)	
Climate Mitigation and Adaptation	\$31,250	\$14,390	\$49,566	\$35,176	
Conservation Technical Assistance	\$13,300	\$17,909	\$85,823	\$67,913	
Erosion and Sediment Management	\$627,961	\$716,715	\$593,500	(\$123,215)	
Fire and Forestry	\$0	\$0	\$135,000	\$135,000	
Habitat Enhancement	\$982,163	\$702,030	\$7,620,169	\$6,918,139	
Santa Cruz Mountains Stewardship Network	\$347,346	\$112,966	\$307,380	\$194,414	
Water Resources & Conservation	\$4,089,700	\$4,433,669	\$2,231,600	(\$2,202,069)	
Water Quality	\$66,522	\$37,730	\$101,034	\$50,000	
<b>Subtotal Program Expenses</b>	<b>\$6,159,042</b>	<b>\$6,037,742</b>	<b>\$11,124,672</b>	<b>\$5,073,626</b>	
<b>Total Expenses</b>	<b>\$7,426,801</b>	<b>\$7,127,427</b>	<b>\$13,101,923</b>	<b>\$5,961,192</b>	
<b>NET</b>	<b>\$2,989</b>	<b>\$395,377</b>	<b>\$98,878</b>	<b>(\$333,195)</b>	
<b>Operating Reserve Allocation</b>			<b>\$ 250,000</b>		