

**SALC Draft Round 7 Guidelines Public Comments Log**

<b>Commentor</b>	<b>Section</b>	<b>Topic</b>	<b>Comment</b>
Shayne Green - Consultant	Section 2: Agricultural Conservation Acquisition Grants	Agricultural Use	Give scoring consideration to the agricultural productive capacity of the entire project area, not just "soil quality" which may vary across a property and does not account for a project's overall impact in terms of productive capacity conserved.
Shayne Green - Consultant	Section 2: Agricultural Conservation Acquisition Grants	Agricultural Use	Give equal standing to all practices which achieve sustainable agricultural and food security climate benefits regardless of whether or not they are CDFA-approved. Point awards should account for the scope, scale, and significance of the benefits. Agricultural uses or practices which maintain the features the CDFA practices are intended to produce should receive equal points. For instance, a grazing operation designed to maintain the natural riparian buffer strips and silvopastoral composition should receive equal points as another operation that seeks to attain a similar baseline condition. The outcomes of the latter case are not a sure bet, whereas the outcomes in the former case can be more or less assured through proven long-term practices and can be re-enforced by the terms of the conservation easement.
Santa Clara Valley Open Space Authority	Section 2: Agricultural Conservation Acquisition Grants	Appraisals	<p>On Page 17, under Eligible Costs, it states "Only direct costs incurred to acquire the easement or fee title to the property during the grant term specified in the Grant Agreement are eligible for payment under this program."</p> <p>In past rounds, appraisal costs incurred prior to award of the grant were eligible as well, as long as the appraisal was approved by DGS.</p> <p>Given that an appraisal completed prior to submittal of a SALC application can result in a more accurate estimate of value in the application, it would be helpful to allow the cost of an appraisal prior to, as well as within, the grant term to be eligible for reimbursement.</p>
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Associated Costs	The addition of the \$50,000 has been game changing in SFC's ability to move acquisition projects to closing within the grant term.
Santa Clara Valley Open Space Authority	Appendices	Carbon Farm Plan	Suggestion to define any additional requirements for a Carbon Farm Plan. It appears that only the minimum requirements for a "management plan" are listed in Appendix J, which likely refers to the "sustainable management plan" mentioned in the selection criteria, but there are no

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			specific requirements laid out for a Carbon Farm Plan other than very briefly on page 17.
Shayne Green - Consultant	Section 2: Agricultural Conservation Acquisition Grants	Climate Resilience	<p>In terms of providing climate resilience, non-intensive grazing management has numerous inherent benefits over other forms of more intensive agriculture that would be possible on those grazing lands, including row crops, vineyards, orchards, and Cannabis production. Non-intensive grazing inherently supports more carbon sequestration, tends to degrade soils less, builds more soil carbon, and conserves more water. None of this is accounted for in the above Selection Criteria, and in fact grazing is placed at a distinct scoring disadvantage by the scoring guidance. Many of the recommendation listed below are intended to address this issue.</p> <p>Give equal standing to all practices which achieve meaningful climate benefits regardless of whether or not they are CDFA-approved. Agricultural uses or practices which maintain the features the CDFA practices are intended to produce should receive equal points. For instance, a grazing operation that maintains natural riparian buffer strips and silvopastoral composition should receive points for those practices.</p>
Shayne Green - Consultant	Section 2: Agricultural Conservation Acquisition Grants	Climate Resilience	Eliminate the 1 point per practice scheme, which neglects the scope, scale, and significance of the practices being utilized. A more qualitative assessment of all practices/land uses being employed may be appropriate here, with a maximum of 7 points possible.
Shayne Green - Consultant	Section 2: Agricultural Conservation Acquisition Grants	Climate Resilience	Evaluate total GHG's avoided by the entire project and give it equal or greater weight as the GHGs avoided per acre. As currently drafted, a large grazing land project may have 10 times the GHG benefits as another project but only receive a fraction of the points.
Santa Clara Valley Open Space Authority	Section 2: Agricultural Conservation Acquisition Grants	Climate Resilience	Suggestion to include natural floodplain protection as a specified environmental co-benefit in the climate resilience section of the selection criteria, as well
Sierra Foothill Conservancy	Section 1: Introduction and Summary	Climate Resilience	Page 2: "Contribute to carbon neutrality and build climate resilience through support for sustainable land management practices". Although Important and relevant, DOC SALC Is an acquisition program and Its difficult for Section 2: Agricultural Conservation Acquisition Grants to fulfill goals that can only be accomplished through on the ground land management activities.

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CalCAN	Section 2: Agricultural Conservation Acquisition Grants	Co-benefits	<p>SALCP projects can further multiple co-benefits through improved land management and other conservation efforts. However, the current draft selection criteria are confusing and, in some cases, redundant.</p> <p><b>Recommendation:</b> We recommend combining and simplifying Selection Criteria #2 (page 21), #4 (page 21), and #5 (page 22) into one category, as suggested below:</p> <p>The acquisition builds climate resilience, advances sustainable agricultural use, and provides environmental co-benefits:</p> <ol style="list-style-type: none"> <li>1. Implementation of USDA-NRCS or CDFA conservation practice standards that advance soil health, water conservation and enhanced biodiversity by using two or more practices (Note, the list of practices could be included in an Appendix and borrowed from the Healthy Soils, SWEEP, Alternative Manure Management Program to make clearer to the applicants the practices the program intends to support).</li> <li>2. Inclusion of a SALC-funded conservation management plan or comparable plan.</li> </ol> <p>We propose dropping the soil quality data collection requirement unless SALC proposes paying for soil testing over time as one soil test is not likely to reveal much. As groundwater management plans are not yet final in many parts of the state, we propose dropping this for now.</p> <p>We are not sure what a “habitat transition zone” is and suggest defining it and making clear how individual landowners can understand it and how they can participate or dropping it all together. Finally, we also propose dropping references to wildlife conservation plans unless it is made clearer how the landowner might participate in these efforts in a meaningful way.</p>
AFT/CFT	General	Collaboration	<p>As land trusts and conservation partner organizations, we value the role the Department plays in administering policy and programs. We would like to offer our collective knowledge in working with the Department as new changes to programs are considered and developed. We believe having discussions with partners before the Department makes policy and program recommendations is an efficient and effective way to ensure input from partner organizations is included, while also meeting the state goals for the protection of agricultural lands, climate, and biodiversity.</p>

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CalCAN	General	Collaboration	<p>Improved integration across state programs can go a long way in supporting conservation and climate resilience goals.</p> <p><b>Recommendation:</b> We suggest that DOC, CDFA and SGC meet to discuss how increased application points across the SALC and Climate Smart Agriculture Programs at CDFA can improve program integration and related outcomes. Those farmers and ranchers, who already have SALC funded easements, and are seeking financial and technical support under the CDFA Climate Smart Agriculture (CSA) Programs should receive increased CSA application scoring points and same should be true for those CSA recipients applying for SALC funding for the first time. More can be done to create a cross-walk between state programs aimed at improving climate resilience. One simple but impactful option is to give successful applicants across programs additional points for engaging in cross-agency programs.</p>
CalCAN	Section 3: Agricultural Land Conservation Planning Grants	Community Engagement	<p>We support increased community consensus building activities for the Section 3: Planning Grants grants but this requires greater resources to accomplish these efforts.</p> <p>Recommendation: Provide a range of Section 3: Planning Grants grant funding from \$250,000 to \$500,000 with larger grants going to those local government entities that will engage in deeper community consensus building to support their policy Section 3: Planning Grants development.</p> <p>We heard very clearly on our interviews on SALC Section 3: Planning Grants grants that more funds are needed to allow for community consensus building to support changes to the General Plan and related efforts like farmland mitigation programs to support farmland conservation. It is simply not feasible to get this work done under the same funding levels offered in prior years. Not all Section 3: Planning Grants grant efforts may be ready for this community consensus work or may benefit from other funds, so we support a range of available funding levels.</p>

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California Rangeland Trust	Section 2: Agricultural Conservation Acquisition Grants	Competitiveness	<p>We are also concerned that the direction of changes in the guidelines year over year are gradually making ranches less competitive. For example, ranches are not generally within urban growth boundaries and do not offer the employment opportunities typically found in other agricultural operations. But conserved rangelands - as detailed in EXECUTIVE ORDER N-82-20 - can safeguard the State's economic sustainability, protect biodiversity, enable enduring conservation measures on working lands, build climate resilience through carbon sequestration, and livestock grazing reduces the risk of extreme wildfire events. A 2018 study conducted by scientists at UC Berkeley determined that 306,000 acres of private, working ranchlands conserved by the Rangeland Trust provide over \$1.44 billion in ecosystem services to the people of California annually.</p> <p>These more restrictive criteria are further concerning because SALCP has been a significant source of funding for agricultural land conservation over the past seven years. Funding for agricultural land was very limited prior to the creation of SALCP. In a state where the loss of agricultural land to residential and rural residential development is relentless, a stable source of funding is essential to slow the trend. SALCP funds have also provided a critical match to federal NRCS ACEP-ALE funds, thereby bringing California millions of additional dollars for agricultural land conservation.</p>
Solano Land Trust	General	Consistent Funding	<p>First I would like to repeat something I state each time I have had the opportunity to stand in front of the SGC during awards. It takes time to create trust with and to educate landowners about what a land trust does and what an conservation easement is. An easement is a tool in the tool box of landownership and agricultural production and landowners and producers have a choice to use this tool when it fits their landownership goals or their farm business needs. Having a funding source that is consistent each year and for consecutive years is so important in the outreach and success of land trusts in engaging a landowner and having them become a willing seller. Much of the SALC goals are met only with the partnership of the landowner and the work the land trusts do to build that partnership. I am always very thankful for and encourage the continued funding commitment, because it does take land trust work and time to bring along a landowner as they decide to conserve their land with an easement in perpetuity.</p>

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CFT	General	Continued Changes	<p>CFT supports the comments submitted by American Farmland Trust and would also like to offer additional comments more specific to CFT. CFT has long supported the Department of Conservation (DOC) and Strategic Growth Council's (SGC) goals in implementing SALC as an important climate and land conservation program for California. However, each year SALC continues to face revisions to an already effective program. These major revisions make it harder to work with interested landowners when the Guidelines change each year. This is becoming counterproductive to the intent of SALC and hinders CFT's ability to conserve more farmland, even as California continues to lose an average of 50,000-acres of agricultural land per year. The draft Guidelines propose numerous additions that appear to dilute the intent of SALC and make it challenging to attract willing farmers and landowners to participate in farmland protection.</p>
Solano Land Trust	General	Continued Changes	<p>With that said the continues guideline updates and changes become an obstacle in that trust and partnership process. I know I have landowners that I have been "courting" over the years that have fit the Risk and Criteria and it does get hard to explain the changes in the Guidelines and I have seen landowners wain and take a step back when I have to address the funding guidelines changes or how the changes my affect the scoring or if new requirements are included.</p>
Sierra County	Section 2: Agricultural Conservation Acquisition Grants	Deed Language	<p>Cause for concern: The language of the acquisition or easement program can be in direct conflict with existing agricultural programs such as the Land Conservation Act and the resultant contracts that are in place between a landowner and the County. Examples are the Williamson Act (Land Conservation Contracts); the Farmland Security Zone (FSZ), Important Farmlands, and other related Program, where implementation of the restrictions or conditions of an acquisition or easement can create direct conflicts with existing long-term contracts in place between the landowner and the County posing serious threats to the property owner being in breach of the contract creating fiscal uncertainty and legal entanglement, not to mention possible threats to sustainable agricultural practices on the property involved contract creating fiscal uncertainty and legal entanglement, not to mention possible threats to sustainable agricultural practices on the property involved.</p>

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Center for Land-Based Learning	Section 3: Agricultural Land Conservation Planning Grants	Eligible Applicants	<p>Through our intensive training programs, business incubators, apprenticeship and internship opportunities, and youth programs, the Center for Land-Based Learning supports the business of agriculture while at the same time developing and promoting practices that protect biodiversity, reduce greenhouse gasses, and build climate resiliency. We see ourselves as both farmers and educators, with farm-based programs providing the learn-by-doing curriculum that trains future farmers in climate-smart and other sustainable practices.</p> <p>We are very interested in working with the SALC program to expand these efforts on our new 30-acre farm near Woodland through a Section 3: Planning Grants grant application. However, it has come to our attention that non-profit organizations are not included in the list of eligible organizations for Section 3: Planning Grants grants. This is unfortunate, especially since non-profits ARE eligible for the easement funding.</p> <p>We are confused by this as several of the activities that were funded through the Section 3: Planning Grants grant program during the last cycle are well-suited to be carried out by a non-profit organization. As with all of our work, we would seek to build a collaboration among local stakeholders such as individual landowners, the Yolo County RCD, research institutions, and other local agencies. In previous collaborative efforts, we have learned that non-profit organizations often can be more nimble than government agencies, allowing us to get the work done more efficiently while being true to the broad consensus goals of any collaboration.</p> <p>Please consider adding non-profit organizations to the list of eligible applicants for this next round of SALC Section 3: Planning Grants grants.</p>
AFT/CFT	Section 1: Introduction and Summary	EO N-82-20	<p>The inclusion of the Executive Order (EO) N-82-20 as stated as part of the goals of and objectives of the SALC program made clear the state's intent to integrate these efforts into the 2021 program year. <i>Can the Department expand on how or if future recommendations organized by the state related to the addressing the EO will affect the proposed SALC Guidelines after adoption?</i></p>

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Santa Clara Valley Open Space Authority	Section 1: Introduction and Summary	EO N-82-20	The Authority applauds and supports the revisions to the program goals, including: The incorporation of Governor Newsom's Executive Order N-82-20 from October 2020, and embracing its focus on aggressive land and water conservation that will benefit biodiversity, climate resilience, and where the lands that are conserved are working lands, partnering with land managers to improve our state's economic sustainability and food security.
CFT	Section 1: Introduction and Summary	EO N-82-20	Using SALC to address several priorities diminishes the meaningful intention. Specifically, the proposed Guidelines include the Governor's Executive Order N-82-20 (EO), which calls for the accelerated use of nature-based solutions to address the climate and biodiversity crises. CFT agrees to the inclusion of this in the Guidelines and acknowledges the need to coordinate these efforts. However, it must be recognized that agricultural lands already provide the best nature-based solution by protecting the land from conversion to non-agricultural uses. California's biggest threat is losing productive agricultural lands to urbanization. The primary goal and intent of SALC should remain to protect agricultural lands to reduce greenhouse gas emissions by improving infill development. CFT would like to offer, before Round 8 Guidelines, for DOC to work with its land trust partners to develop practical and successful pathways to provide a robust SALC program that recognizes the Governor's EO without diluting the program with additional priorities.
Sierra Foothill Conservancy	Section 1: Introduction and Summary	EO N-82-20	Page 2: We support the Inclusion of the N-82-20, we would also like to see the language from AB-32 remain, as It Is still relevant and vital to the protection of agricultural land.
AFT/CFT	Section 1: Introduction and Summary	Equity	In general, we are appreciative of the strides the Department of Conservation (Department) has made to refine the Sustainable Agricultural Lands Conservation Program (SALC). We also collectively applaud the inclusive language the guidelines make in addressing Priority Populations and outlining the state's commitments to serving California Native Tribes and serving Socially Disadvantaged Farmers and Ranchers.



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AFT/CFT	Appendices	Equity	<p>Narrative Questions section of the guidelines, Page 78 (tracked version), item 3c. As referenced in the guidelines, a potential area to advance equity includes leasing protected agricultural lands to Socially Disadvantaged Farmers or Rancher for a term of no less than 10 years.</p> <p>How does the Department anticipate this portion of the grant application to be implemented? If an applicant opts to participate in this activity, will this be a requirement to the easement terms? In the event a property owner is unable to maintain a lease to a disadvantaged farmer for the minimum of 10 years, what would occur, and are monitoring entities required to ensure the lease to a SDFR is active?</p>
Santa Clara Valley Open Space Authority	Section 1: Introduction and Summary	Equity	The Authority applauds and supports the revisions to the program goals, including: The incorporation of a stronger focus on socioeconomic and racial equity as a priority through continued commitments to vulnerable populations, and new commitments to indigenous peoples of California, as well as to socially disadvantaged farmers and ranchers
Santa Clara Valley Open Space Authority	Section 2: Agricultural Conservation Acquisition Grants	Equity	Suggestion to define process by which the Department would confirm ownership by, or tenure to, a socially disadvantaged farmer over the 10 year period, including whether this requirement goes into the recorded deed, and any consequences if a socially disadvantaged farmer can no longer be secured prior to completion of the 10 year period
Santa Clara Valley Open Space Authority	Section 2: Agricultural Conservation Acquisition Grants	Equity	Suggestion to add elsewhere in the guidelines a description of desired elements or requirements for a farm incubator or new farmer training program, as called out in the equity and opportunity section of the selection criteria
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Equity	Page 23: We've noted the addition of Socially Disadvantaged and support that, we would like to suggest possibly Including beginning and veteran farmers as defined by USDA for their NRCS ACEP ALE program.
Santa Clara Valley Open Space Authority	Section 2: Agricultural Conservation Acquisition Grants	Fee Acquisitions	We are grateful to the Department for continued support of fee Section 2: Agricultural Conservation Acquisition Grants, as it is such an important tool in the farm and rangeland conservation toolbox. We hope it continues to be supported by the Department in future rounds of the SALC program as well

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Santa Clara Valley Open Space Authority	Section 2: Agricultural Conservation Acquisition Grants	Fee Acquisitions	<p>As with Round 6, title to the property of a fee acquisition will be encumbered with covenants that include (on Page 55 of the Draft Guidelines) that "The property must actively be used for agricultural uses." This creates an affirmative agricultural requirement, which can be very difficult to continue in perpetuity, whether for the Grantee, or the eventual purchaser of the land subject to an agricultural conservation easement. Economic, climate, and other changes over time can greatly impact the ability to make productive and profitable agricultural use of a property. This requirement could severely limit the ability of the Grantee from completing the buy-protect-sell transaction, which is often the ultimate goal of this tool. The affirmative agricultural requirement is also not part of the conservation easement portion of the SALC program.</p> <p>We suggest changing the language of this bullet to, "The agricultural productive capacity and open space character of the Property will be conserved and maintained forever."</p>
Santa Clara Valley Open Space Authority	Section 2: Agricultural Conservation Acquisition Grants	Fee Acquisitions	<p>We are grateful for the change to fee Section 2: Agricultural Conservation Acquisition Grants where a management plan is developed, that the grantee has up to one year after close of escrow to complete the plan. As opposed to conservation easements, a seller in fee will not be engaged in the long term stewardship of the property, and it is therefore very difficult to develop management plans without site control.</p> <p>Suggestion that the conflict with the above change in due date for a fee acquisition management plan, which appears at the bottom of page 17, be corrected, so that in both places, it clearly states the due date one year after close of escrow</p>
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Food Systems Resilience	<p>Page 24: 2. and 4. Overall this section is a bit disadvantageous for grazing lands since the supply chain, life cycle and distribution system for meat is a lot different than produce, it's not very feasible for most meat producers to participate in the listed opportunities here.</p>
AFT/CFT	Section 1: Introduction and Summary	Funding	<p>Funding for this program has remained a bright spot for ongoing agricultural land conservation work in California. The state of California has lost over one million acres of agricultural land over the past three decades at a rate of 50,000 acres per year. If current development trends continue, it is anticipated that 1.4 million acres will be lost by mid-century. Stable funding remains a critical need in addressing agricultural conservation as well as in helping the state meet its climate and biodiversity goals.</p>

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AFT/CFT	Section 3: Agricultural Land Conservation Planning Grants	Funding	<p>Section 3: Planning Grants grants continue to be an excellent companion program to address the critical need to plan for agricultural resources and future growth and management of these natural and working land resources. With the addition of further qualifications on the potential partners an applicant can seek, it may make sense that the SALC Section 3: Planning Grants grants portion of the program explore two tiers or level or grant readiness.</p> <p>One for grants that may not be as complex or require significant public and partner engagement. Another tier that would allow for significant investment in building meaningful and durable engagement with community partners for more complex solutions. If a two tiered system was developed, it should be explored at funding grants at \$250,000 and \$500,000 respectively.</p>
Santa Clara Valley Open Space Authority	Section 3: Agricultural Land Conservation Planning Grants	Funding	<p>We do, however, strongly suggest the greater integration of the AHSC and SALC programs as recommended by the Resilient California report published by CalCAN in December, 2020. This could go a long way to conserving working lands while supporting infill and compact development.</p> <p>One way to help accomplish this may be within the Section 3: Planning Grants Grants under SALC, in which a two tiered system be adopted where \$250,000 is awarded for Section 3: Planning Grants efforts that develop agricultural plans by a process that is not particularly complex, and up to \$500,000 for Section 3: Planning Grants efforts that either integrate housing or other general plan elements with agricultural plans or which include significant community engagement, or both.</p>
Santa Clara Valley Open Space Authority	Section 2: Agricultural Conservation Acquisition Grants	Funding	<p>We appreciate that the grant program continues to allow grantees to request that awards be increased by 5% without SGC approval or up to 15% with SGC approval if the appraisal comes in higher than the awarded amount. This flexibility allows modest changes in value, that can come about due to a variety of real world circumstances</p>
Feather River Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Greenhouse Gas Emissions	<p>To reiterate something I've mentioned before, I remain puzzled by the criteria of GHGs avoided per acres. If the goal is to avoid GHGs, then would you not be using SALCP funds to better effect if you were to base the points on GHGs avoided per SALCP dollar invested? Or even to align the point structure to overall GHGs avoided? As it is, the point system selects against large, relatively inexpensive projects that avoid a lot of</p>

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			GHGs. This isn't critical, since it's only 5 points, but I felt compelled to bring this up again.
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Greenhouse Gas Emissions	Page 23: 2. "GHG's avoided per acres relative to other projects within the application pool". Isthis based on avoided conversion methodology or management practices?
AFT/CFT	Section 2: Agricultural Conservation Acquisition Grants	Groundwater Recharge	Additionally, with the added emphasis of the EO, it appears that the department is de-emphasizing environmental co-benefits specific to groundwater recharge and improvements to air quality which provide numerous opportunities to address improving public health outcomes outside of wildfire related air quality benefits. Groundwater aquifers offer opportunities to implement projects such as Ag-MAR, "a recharge technique for groundwater replenishment, in which farmland is flooded during the winter using excess surface water in order to recharge the underlying aquifer. Ag-MAR is currently being implemented in California as part of the efforts to mitigate California's chronic groundwater overdraft1" and has been widely touted as a flexible flood management tool to address direct impacts from climate change. <i>Groundwater Management should be reinstated as an environmental co-benefit.</i>
AFT/CFT	Section 2: Agricultural Conservation Acquisition Grants	Groundwater Recharge	The existing language in this section addresses reductions in consumptive water use, or conservation of water usage, but fails to address the unique opportunity that some lands present as beneficial recharge areas. Losing supportive groundwater recharge language in these guidelines, would set back the potential for agricultural easements to create winning working lands solutions that address climate challenges.
California Rangeland Trust	Section 2: Agricultural Conservation Acquisition Grants	Groundwater Recharge	Groundwater Sustainability Plans. These plans may be applicable to irrigated farmland, but rangeland does not typically have wells. We would like this criterion broadened to include maintenance of water quality and groundwater recharge.
Santa Clara Valley Open Space Authority	Section 2: Agricultural Conservation Acquisition Grants	Groundwater Recharge	Suggestion to reinstate groundwater recharge as a specified environmental co-benefit in the climate resilience section of the selection criteria, where it would receive more points than in the "other" section as it is currently, where it would receive only 1 point

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Shayne Green - Consultant	Section 2: Agricultural Conservation Acquisition Grants	Groundwater Sustainability Plans	Eliminate the “consistent with a Groundwater Sustainability Plan (if relevant)” criterion, or assign points as a default for projects located in areas that do not need such Plans.
AFT/CFT	Appendices	Groundwater Sustainability Plans	<p>Consistency with Sustainable Groundwater Management Plans, Narrative Questions section of the guidelines, Page 78 (tracked version), item 4b. We are concerned with the requirement to analyze Groundwater Management Plans as a component of these proposed guidelines for the program. While we appreciate the desire to capture consistency with local Groundwater Management Plans by Groundwater Sustainability Agencies, we believe this to be an overburdensome criteria. In the guidelines it is implied that the consistency will be shown at the application stage.</p> <p>Will there be an ongoing, or annual reporting requirement to the Department to ensure easements remain compliant with GSPs plan updates (every five years), or when a GSA adopts a future plan (ex. January 31, 2022, for all other high- and medium-priority basins)?</p>
AFT/CFT	Section 2: Agricultural Conservation Acquisition Grants	Groundwater Sustainability Plans	<p>We instead recommend the environmental co-benefit of potential for groundwater recharge be reinstated as it reflects a critical state priority for the goal of bringing groundwater basins into balancing as a bracing impact of climate change. Language should replace the Selection Criteria under: The acquisition will support long term sustainable agricultural use and safeguards food security. Projects will be evaluated based on the following - Consistency with local groundwater sustainability plan (if relevant) (4 points maximum)</p> <p>Alternate 3.: Support Groundwater recharge. (4 points maximum)</p>
CFT	Section 2: Agricultural Conservation Acquisition Grants	Groundwater Sustainability Plans	CFT is concerned with the new requirement to analyze Groundwater Sustainability Plans (GSPs) for consistency with a project as a component of the Guidelines. Not all GSPs have been adopted and the Sustainable Groundwater Agencies continue to develop how they will implement the GSPs. Rather than analyzing GSPs, CFT suggests to drop this overburdensome criteria and proposes that points be allocated for lands that can provide groundwater recharge and water efficiency practices.
CFT	Section 2: Agricultural Conservation Acquisition Grants	Habitat Plans	CFT requests DOC to provide definitions and <b>further resources for terms such as “Habitat Transition Zones” and resources to find adopted habitat or wildlife conservation plans, regional habitat or wildlife conservation programs or habitat or wildlife mitigation plans given the eligible application points.</b>

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AFT/CFT	Appendices	Habitat Transition Zones	Additionally, it is requested that the department provide a definition or further resources for “habitat transition zones” as referenced in the Narrative Questions section, item 2b. (on tracked changes guidelines document page 78).
California Rangeland Trust	Appendices	Habitat Transition Zones	What is the definition of a habitat transition zone?
Santa Clara Valley Open Space Authority	Appendices	Habitat Transition Zones	Suggestion to define "habitat transition zones" and "greenbelt" in the glossary since both are used in the selection criteria. "Habitat transition zones" are new to this draft of the guidelines and "Greenbelt" was in the selection criteria last round but is now worth more points
CFT	Appendices	Habitat Transition Zones	<b>CFT requests DOC to provide definitions and further resources for terms such as “Habitat Transition Zones”</b> and resources to find adopted habitat or wildlife conservation plans, regional habitat or wildlife conservation programs or habitat or wildlife mitigation plans given the eligible application points.
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Habitat Transition Zones	Page 23: 4. "The presence of habitat transition zones". Great new addition and something SFC and many land trusts across the state consider in our own criteria.
Shayne Green - Consultant	Section 2: Agricultural Conservation Acquisition Grants	Infill Development	Recommendation 1: Either define “agricultural lands of special environmental significance” or correct that reference to be clear that a project must still support infill development regardless of environmental significance.
Shayne Green - Consultant	Section 2: Agricultural Conservation Acquisition Grants	Infill Development	Recommendation 2: Make the definitions of “most at risk of urban and suburban sprawl,” or “best supports infill and compact development” as explicit as possible. Do not limit this to highly localized population growth—leave room for ample consideration of all relevant factors driving risk of parcelization/development.

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Shayne Green - Consultant	Section 2: Agricultural Conservation Acquisition Grants	Infill Development	<p>Currently in northern CA, and especially in unprotected areas outside of the coastal plain, virtually any grazing land with good access, water, relatively flat building areas, and commutable (45-minute drive or less) proximity to a population center with goods and services is at risk of subdivision and development, regardless of localized patterns of population growth within the population centers themselves. This is consistent with US census data showing that the area developed at urban densities grew nearly twice as fast as populations within urban areas between 1950-20101. These observations suggest that local population growth alone is too narrow an indicator of the risk of development faced by agricultural lands.</p> <p>For this reason, I support the use of parcelization/development patterns as the basis for determining project eligibility (though I think 5 miles is too close to use as a distance threshold and would recommend extending it to a greater distance that is still commutable for most Californian's). I would encourage the use of 10 to 20-year development patterns in the Selection Criteria as an alternative indicator that applicants may use to demonstrate risk and earn associated points in the scoring scheme.</p>
Shayne Green - Consultant	Section 2: Agricultural Conservation Acquisition Grants	Infill Development	Add alternative criteria applicants can use to demonstrate that the ag lands to be protected by the proposed project are at risk of subdivision & development and that population is growing in their vicinity (eg. an analysis demonstrating the number of new parcels created or new homes developed within a 5 to 10-mile radius of the proposed project over the last 10 years).
Shayne Green - Consultant	Section 2: Agricultural Conservation Acquisition Grants	Infill Development	Increase the distance from the nearest town or CDP that a project can be and still receive points. Many people are willing to commute 20-30 miles to and from work these days, or to and from goods and services.
Shayne Green - Consultant	Section 2: Agricultural Conservation Acquisition Grants	Infill Development	Consider re-invoking a prior Risk Option that recognizes the relevance of administrative Certificates of Compliance (CoCs) in increasing the risk of subdivision of an agricultural property.
AFT/CFT	Section 2: Agricultural Conservation Acquisition Grants	Infill Development	We would like to offer a principal concern with the direction of the SALC program's selection criteria. We urge the Department and the Strategic Growth Council to work together to streamline and simplify the selection criteria in the SALC guidelines and alternatively focus infill policies through increasing Section 3: Planning Grants grants, technical assistance,

Commentor	Section	Topic	Comment
			community outreach and better regional coordination with the Affordable Housing and Sustainable Communities program.
AFT/CFT	Section 2: Agricultural Conservation Acquisition Grants	Infill Development	We are deeply concerned with the approach recommended by the Department surrounding the change in acquisition selection criteria that supports infill and compact development and is proposed to comprise 10 points out of 25 of possible points. The shift in approach in addressing the conversion risk, changes how projects are evaluated and replaces the prior methodology by using Appendix K, which averages the two most recent censuses. The prior methodology assigned points to projects that are “located within 2 miles of a city sphere of influence for a city with a population greater than 5,000, or within 2 miles of a census designated place (CDP) with a population greater than 5,000.” This moves to a matrix that assigns points based on the distance of a project from a city or census designated place or population center’s growth rate and may provide an advantage to projects located near centers of high population growth, shifting how and where projects are awarded if this methodology is used. Further, this shift in risk criteria evaluation would create added burden to proponents in requiring additional screening parameters of projects in the absence of state screening tools.
AFT/CFT	Appendices	Infill Development	Page 77 of the tracked version of the proposed guidelines, the Narrative Questions for the SALC application includes question 1a. The question requests that the data source be provided. If the Department proceeds with this change in methodology, it is recommended that the department provide the appropriate link to the supporting resources, and provide examples illustrated in the comments for applicants to reference as part of the application process.
California Rangeland Trust	Section 2: Agricultural Conservation Acquisition Grants	Infill Development	As described in comment letters from CalCAN and the American Farmland Trust/California Farmland Trust, the Rangeland Trust is concerned about the shift in the SALCP selection criteria to a strong focus on contribution to infill and compact development which will severely limit eligible conservation easement Section 2: Agricultural Conservation Acquisition Grants and result in lost opportunities for important working lands. We encourage the Department and the Strategic Growth Council to use Section 3: Planning Grants grants, technical assistance, community outreach, and better regional coordination with the Affordable Housing and



Commentor	Section	Topic	Comment
			Sustainable Communities grant program to advance infill and compact development goals.
California Rangeland Trust	Section 2: Agricultural Conservation Acquisition Grants	Infill Development	Risk Options vs. Infill Support Points Matrix (Appendix K). We recommend using the risk option criteria that provides a broader picture of a property's role in supporting agriculture and limiting development near a town, unincorporated community, or census designated place. In addition, the guidelines do not present a clear methodology for calculating infill support points shown in Appendix K.
California Rangeland Trust	Section 2: Agricultural Conservation Acquisition Grants	Infill Development	We also recommend reinstating the certificates of compliance risk options that were deleted in the 2020 guidelines for the rare case that these options will confer eligibility.
Santa Clara Valley Open Space Authority	Section 1: Introduction and Summary	Infill Development	The Authority is in strong support of an increased connection between the SALC program and efforts to focus development on infill and more compact development. Because of the need to preserve our working lands as well as other greenfields surrounding urban areas, we would, in fact, like to see no new greenfield development in California's future as soon as is reasonably possible.
Santa Clara Valley Open Space Authority	Section 2: Agricultural Conservation Acquisition Grants	Infill Development	We are agnostic to the formula used to score a project against infill-type criteria, preferring to leave that to those who have more knowledge about the opportunities and challenges statewide to qualifying working land conservation projects that are at risk of conversion
CalCAN	General	Infill Development	While CalCAN strongly supports efforts to improve infill development and conservation of at-risk agricultural lands, we are concerned that the proposed changes to the SALC guidelines will not succeed in their intended effort to support improved land use changes. Below we offer our comments with the intention of furthering our collective aims of reducing land-use related greenhouse gas emissions, improving infill development and enhancing climate resilience.

Commentor	Section	Topic	Comment
CalCAN	Section 2: Agricultural Conservation Acquisition Grants	Infill Development	<p>Location relative to centers of population growth is too simplistic an indicator to demonstrate whether or not a proposed SALC acquisition project is supporting infill development and a cohesive agricultural region. The Risk Options, as outlined in Appendix A, should be maintained as the primary tool for determining whether or not a project is at risk of development and helping to avoid significant greenhouse gas emissions.</p> <p><b>Recommendation:</b> Drop the use of Appendix K and restore the use of the Risk Options in Appendix A to guide DOC's decision-making on the eligibility of a project.</p> <p>Cities and towns can have very large Spheres of Influence (SOI) in California where their planned growth can occur. Focusing on whether or not an acquisition project is adjacent to a growing population center could miss out on the development plans for that region – e.g., expanded SOI, changes to the General Plan, changes to ag zoning – that put that agricultural land at risk of development. The Risk Options in Appendix A are better able to capture these issues compared to Appendix K, which fails to capture how local development plans put land at risk of conversion.</p>
CFT	Section 2: Agricultural Conservation Acquisition Grants	Infill Development	<p>The newly proposed criteria that would account for 10 points based on location relative to centers of population growth is too simplistic of an approach to demonstrate whether or not a proposed project is supporting infill development. The greatest flaw in the methodology using the Appendix K approach, with the two most recent decennial census, is that the current most recent decennial census results are from 2000 and 2010. The 2020 census results are only projected to release the first results of the 2020 census on April 30, 2021, which means the Guidelines would be adopted prior to current data being made available to the public. Should the proposed census release date be postponed, the ranking criteria would be based on data that is 10 to 20 years old, or applicants will be forced to scramble once the data is released, hopefully by the time of the pre-proposal stage. Even if more current data were available, it would quickly become outdated by using this methodology and not truly capture growing spheres of influence, changes to general plans, and agricultural zoning changes that truly put agricultural lands at risk of development. CFT strongly encourages DOC to not proceed with this methodology given the timing and availability of accurate and current census data and to continue with the previous Risk of Conversion approach. If DOC does proceed with</p>

Commentor	Section	Topic	Comment
			<p>this change in methodology, it is recommended that appropriate links are provided to find these resources and provide examples to assist applicants in the application process.</p>
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Infill Development	<p>Page 21: "The acquisition supports infill and compact development...." (25 points) If SGC wants to support in fill development then wouldn't it be counter active to conserve properties close or close proximity to population centers and instead permit development for housing to promote infill while conserving lands in conservation deficient areas in more "rural" areas?</p>
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Invoicing	<p>Page 45: Thank you for not withholding funds for acquisition. This can cause severe delay and, in some cases, prevent smaller but well qualified organization with wonderful projects from competing.</p>
Shayne Green - Consultant	Section 2: Agricultural Conservation Acquisition Grants	Management Plan	<p>I support the Management Plan concept/option, but am concerned that the way the requirements are written turns the option into more of a costly and cumbersome burden than a vehicle to support good stewardship and the protection of the Conservation Values. It is important to recognize that while the Department is generously offering to cover the initial costs of Plan development, landowners will largely incur the decadal costs of updating the Plans and the inconvenience of updating them more frequently if the associated requirements are too narrow and rigid. Only significant changes in management which have the potential to impair the Conservation Values should trigger an update, not any change as the current language implies. The scope, scale, and significance of the change relative to the Conservation Values, and the consistency of the change with the Conservation Purpose, are important considerations in the determination of whether or not an update is necessary. The Land Trust should have discretion in this determination, and it should be made in consultation with the landowner. Generally speaking, agricultural landowners/operations need flexibility to remain viable and the Management Plan should be broad enough to encompass that flexibility.</p>
AFT/CFT	Throughout	Management Plan	<p>Throughout the document there are several terms introduced in this document. It is recommended Department staff review and cross check the glossary for consistency in the text of the document. For example, Carbon Farm Plans are explicitly listed under Management Plans) and are included as a new standalone Management Plan option. The glossary does Management Plans (formerly Adaptive not include a description of a Carbon Farm Plan but outlines, but rather nests it under the definition of "Conservation" Management Plans.</p>

Commentor	Section	Topic	Comment
California Rangeland Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plan	<p>The permanent conservation of working lands is important to meet the needs of the people for the production of food and fiber, clean air and water, wildlife habitat, open space, healthy soils, and carbon sequestration. California's ranchers and farmers are engaging in production practices that are beneficial to the environment and are economically viable. The SALC Program's primary goal is to permanently protect these valuable resources by forever conserving the land. Not all innovative management practices are viable for all farms and ranches. The SALCP should bifurcate the permanent protection of working lands and voluntary incentives for new management practices. A requirement for management plans was removed from the 2018 Farm Bill due to unintended consequences and landowner resistance nationwide to participate in the NRCS conservation easement program because of the requirement. We believe that requiring such a plan will result in resistance from California farmers and ranchers in moving forward with the protection of their lands.</p> <p>The SALC Program should focus first on protecting these working lands so they remain in agriculture providing their valuable ecosystem services. Voluntary, incentive-based management practices should be secondary to the land protection, not a requirement thereof. Therefore, California Rangeland Trust strongly opposes the requirement for any management plan as a condition of conservation easement funding or for additional points in the ranking process.</p>
CFT	Section 2: Agricultural Conservation Acquisition Grants	Management Plan	<p>CFT appreciates the Guidelines to reflect an optional approach to including a Management Plan and incentivizing those Plan's implementation. CFT would like to reiterate our comments made in the previous round objecting to the requirement of having Management Plans as a component of a project to be eligible for funding. Many farms already incorporate farming practices that protect natural resources. Prescribing how a farmer must farm is a disincentive to participate in land conservation, which would be the adverse to the ultimate objective. If protecting lands for habitat restoration and wildlife protection is a priority to landowners, they will opt to use habitat conservation easement programs. If SALC intends to continue to provide emphasis on protecting and restoring habitat, then the program should be prepared to fund land acquisition that is valued on a more comprehensive list of restrictions. CFT would support an incentive-based approach to Management Plans and would offer to assist DOC in crafting</p>

Commentor	Section	Topic	Comment
			incentive programs that will be effective and practical for farmers and achieve climate change objectives. Lastly, CFT encourages DOC to include the defined terms for Management Plan and Carbon Farm Plans in the glossary.
CFT	Section 2: Agricultural Conservation Acquisition Grants	Management Practices	Rather than providing increased application points to projects that participate in highly competitive Climate Smart Agriculture Programs (CSA), CFT encourages the State to bolster other existing incentive programs outside of SALC, that advance soil health, water conservation and enhanced biodiversity. The current draft Guideline selection criteria in this area are confusing and, in some cases, redundant. Programs such as SWEEP, Healthy Soils, and the Alternative Manure Management Program should remain funded and accessible to a larger number of farmers and ranchers. Those farmers who already have SALC funded easements that are seeking financial and technical support under CSA, should receive increased CSA application scoring points. In addition, CFT encourages the State to develop new incentive programs, particularly to restore and enhance pollinator habitat and enhance wildlife corridors that can be acquired in a similar way as SWEEP and Healthy Soils programs. More incentive-based approaches can be made between State programs for landowners who have already taken a step to preserve their farmland and improve climate resiliency.
Sierra County	Section 2: Agricultural Conservation Acquisition Grants	Notice to Planning Director	Sierra County requests that amendments to the guidelines be developed and implemented. When properly applied, easements and/or Section 2: Agricultural Conservation Acquisition Grants can assist rather than impede agricultural sustainability. The program needs to build into its guidelines, a required early consultation process that involves local government so that locally initiated land conservation contracts, local General Plan policy, and other factors are considered. This early consultation is critical and fundamental to the ongoing success of the program and the sustainability of agriculture. The Department of Conservation, other involved agencies such as NRCS, all have the resources to provide this effective, front-end discussion and its result will remove neighbor conflicts, will resolve local government conflicts, and will garner the proper involvement and support of these key parties.

Commentor	Section	Topic	Comment
Sierra County	Section 2: Agricultural Conservation Acquisition Grants	Restrictions on Agricultural Use	<p>Cause for concern: The acquisition or easement together with restrictions can be found to be in potential conflict with the County General Plan and as in the case of Sierra Valley can pose serious threats to the sustainability of agriculture and poses threats to the continued operation of small family ranches that have historically been the land use pattern as well as the "economic engine" for the County economy. Easements and acquisition can create conflict between neighbors and as just one example, Section 2: Agricultural Conservation Acquisition Grants or easements for wildlife habitat or for wetlands that contain restrictions reducing agricultural use now or in the future, can stymie agricultural sustainability if not properly structured. Local agency review of proposed restrictions is a significant deficiency in the present guidelines.</p>
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Risk Options	<p>Unfortunately, the last two years dozens of long-standing working ranches that we had anticipated applying for SALC no longer meet or compete well in the risk criteria and in reviewing the Round 7 Grant Guidelines &amp; Applications (Section 2: Agricultural Conservation Acquisition Grants) It appears that this remains the case. The SALC Program has always been focused on strategic protection to promote "In fill development", something SFC can wholeheartedly support. In years past the Risk Criteria provided for projects to compete by evaluating the varied and diverse threats that face agricultural land throughout the entire state, rather than the very limited Risk Options that persist in Round 7 and seem to favor proximity to urban centers and counties that are much more advanced in their strategic growth Section 3: Planning Grants. In more rural counties and those counties that have less regulations and outdated general plans, these include minor subdivisions, fragmentation (sale of individual legal parcels rendering ag use infeasible, especially for working rangeland in which many counties minimum parcel sizes for designated agricultural use are sometimes as small as 36 acres) and proximity to rural ranchettes (which in many areas can be as big as 40ac.). SFC would recommend returning at least some of the past Risk Criteria categories such as:</p> <ul style="list-style-type: none"> <li>• Property is determined to be in conformance with the Subdivision Map Act</li> <li>• Property is up to five miles from land developed or zoned for rural residential use</li> <li>• Property is within five miles of other agricultural land sold or advertised as rural home sites, rural recreational sites, or other development within the last five years.</li> </ul>

Commentor	Section	Topic	Comment
			<ul style="list-style-type: none"> <li>• Property is located within two miles of attractions such as a casino, resort, golf course, public recreation area, school or university; or within two miles of a major highway intersection or road(s) planned for expansion.</li> </ul>
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Risk Options	<p>The above categories better encompass the threats facing agricultural land in less urban areas of the state and permit those ag lands at risk for conversion in counties with less advanced Section 3: Planning Grants to compete. Additionally, in order to promote "in fill development", the protection of agricultural lands in the form of connected conserved corridors between population centers would be the most effective tool in ensuring those lands adjacent to Spheres of Influence (SOI) and Census Designated Places (CDP) remain available for development, especially for affordable housing that could utilize public transportation or would have shorter commutes due to their proximity to urban centers.</p>
Feather River Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Scoring	<p>A project that scores highly in the new scoring criteria will be a marvelous thing indeed. I hope for the sake of our state, our climate, our food system, our population, etc., that you receive many high-scoring applications</p>
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Soil Quality	<p>Page 24: 1. "Soil quality, as determined the most recent IFL data for irrigated lands and SSURGO data for grazing lands (5 points maximum)." Can DOC explain the shift away from the NRCS and/or DOC farmland classifications of prime, statewide important, unique, and local importance?</p>

Commentor	Section	Topic	Comment
CalCAN	Section 2: Agricultural Conservation Acquisition Grants  Section 3: Agricultural Land Conservation Planning Grants	Sustainable Communities Strategy	<p>Advancing regional conservation plans, including Sustainable Communities Strategies (SCSs), should happen through increased state-funded Section 3: Planning Grants grants, technical assistance, community engagement by the state and regional coordination across SALC and AHSC programs. Individual projects, whether SALCP or AHSC, are not in a good position to inform or strengthen regional plans. Moreover, not all SCSs include farmland conservation as a strategy, so the existence of a plan in a region where a SALC acquisition project is proposed, for example, is not necessarily a good indication of farmland conservation and related infill development policy (or implementation).</p> <p>Recommendation: We propose dropping from the SALCP Eligibility Criteria (#7 on page 19) and the Selection Criteria (#6.1 on page 22) the requirement that projects support the implementation of regional plans, including SCS plans.</p> <p>When SB 375 was passed in 2008, requiring regional governments to develop SCS plans, farmland conservation requirements had been stripped from the bill. Despite this, some SCS plans advanced with farmland conservation goals and strategies, but others lack any real attention to farmland conservation to support their infill development goals. More needs to be done to shore up SB 375 implementation, but not at the individual project level for SALCP or AHSC. The state has an opportunity to support regional and local governments in improving SB 375 implementation through targeted Section 3: Planning Grants grants, technical assistance, community engagement and regional piloting of AHSC and SALC programs, as discussed in our 2020 report, Resilient California<sup>1</sup>. But relying on local, individual projects to advance larger policy aims is unrealistic and not possible in many key regions of the state that have important agricultural lands but lack good plans to protect them.</p>
Sierra County	Section 2: Agricultural Conservation Acquisition Grants	Timing of Public Comment	<p>For the above stated reasons, and in the spirit of good and transparent public policy, it is in the best interest of the Sustainable Agricultural Lands Program to continue the deadline for comment and immediately move to undertake specific discussions to resolve these critical policy implications that are arising out of the implementation of this program. We would respectfully request that the deadline be extended and the Department immediately undertake these discussions. Sierra County would be most interested to participate in such discussions.</p>



Commentor	Section	Topic	Comment
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Wildland Urban Interface	Page 21: In reference to the new addition of 5 points for Wildland Urban Interface (WUI), How is this measured? An acquisition located in the WUI doesn't equate it with providing wildfire resistance benefits, this is dependent on land type, land use as well as current and future management. Is this criteria based on avoided conversion to residential and therefore long-term lower cost for fire management and prevention?
CalCAN	General		I write on behalf of the California Climate and Agriculture Network (CalCAN) to express our support for the Sustainable Agricultural Lands Conservation Program (SALCP) and to offer our comments on the latest draft program guidelines. We note that this year's draft guidelines propose significant changes to the selection criteria for the acquisition projects and the metrics to assess the projects' impacts. There is also an expansion of Section 3: Planning Grants grants requirements, as we read it, but no additional funds proposed to support this work.
CFT	Section 2: Agricultural Conservation Acquisition Grants		The protection of farmland provides multiple benefits to California communities, including flood protection, wildlife habitat, carbon sequestration, food security as well as the agricultural and State economy. SALC has proven to be a workable, worthy and viable program in order to prevent the conversion of farmlands to non-agricultural uses. CFT encourages DOC and SGC to focus on the original intent of the program and not change the program in ways that will phase out smaller land trusts with less capacity.
Mendocino Land Trust	General		As an overarching theme to the program, I have witnessed for decades urban sprawl pressing further out of all of our California cities, I think that it will be important to allocate funding fairly to the more rural counties in our state. Mendocino County is quickly becoming a bedroom community of the San Francisco Bay Area – people are being pushed further and further out with less land available. While it was not unheard-of just a few years ago to have folks commuting from Santa Rosa to San Francisco, we now have people who commute part time from as far as Ukiah. I believe that the funding guidelines in general should reflect this trend. I strongly encourage the SGC, the DOC, and the SALC program to commit to allocating significant SALC program grant awards to projects in both metropolitan and rural portions of the state such as Mendocino County

Commentor	Section	Topic	Comment
Mendocino Land Trust	Section 3: Agricultural Land Conservation Planning Grants		<p>Allow accredited local land trust organizations to apply for projects identifying priority land for conservation. Frequently these organizations are subject to being reactionary to the other listed agencies while still responsible to their community. Allowing for local accredited land trusts to have funding opportunities for identifying priority land will give them a voice and opportunity to get ahead of projects. Further it will allow the land trusts to develop agricultural corridors similar to landscape projects for wildlife and forested land. Frequently the land trusts have better and longer relationships with ranchers, farmers and others who have already conserved their land, they have gained local trust and may be able to more easily identify at risk areas surrounding or adjacent to already conserved land.</p>
Mendocino Land Trust	Section 1: Introduction and Summary		<p>SGC's Racial Equity Action Plan (2019) requires that SGC's grant programs "Demonstrate Commitment to Racial Equity" and "Develop Minimum Requirements for Racial Equity Priority Topics." The Legislature "recognizes the importance of investing in the long-term prosperity of our food and farming system, starting with our farmers" and that: ...</p> <p>My Recommendations:</p> <ol style="list-style-type: none"> <li>1) "Commitment" spelling should be corrected</li> <li>2) Identified groups are specific and are not in line with more modern JEDI policies. Recommend revising to include a broader group of socially, ethnically or economically disadvantaged groups.</li> <li>3) It does seem like the spirit of equality is reflected in the text however some of the language is dated.</li> </ol>
Solano Land Trust	Section 1: Introduction and Summary		<p>Solano County is an ag county. The County General Plan supports ag uses and does not allow for a municipality to be created outside of the current 7 cities. Each city has the opportunity to grow and annex and that is typically forecasted in a City's Municipal Services Review (MSR) plan approved by Solano LCFCO. The County GP does list area overlay districts and local greenbelts (see attached maps). Many of the 7 Cities have growth boundaries. Solano County has interstate 80 that runs through most the class ½ soils, with 5 of the 7 Cities adjacent to I80. Solano Land Trust By-Laws allow for SLT to work in the unincorporated lands and not in the City limits unless invited to. The SOI of a City is grey area, as the land trust would support a rural landowners decision to conserve their land, we do take time to communicate with the City to understand its possible use of the land in within SOI. Our By-Laws and Articles of Incorporation do not allow Solano Land Trust to interfere with or</p>

Commentor	Section	Topic	Comment
			<p>contest growth, but instead we are directed to engage with the landowners near the city boundaries in the option of a conservation easement. Solano County ag easement values are low and have been for my 10 years on the job. Ag easement vales range from 10% to 27% of the fee. The 27% happens only in very special circumstances, 12% being the long time average value for an AG CE. Ag is the highest and best use of land in rural Solano County at \$35,660 and acre for Orchard land and \$25,000 for open/row crop. Landowners farm it, sell it for farming or hold on for population growth because Ag easement values are so low. I don't think SLT will work with a landowner near the urban edge because owning that land in an ag market is a good thing and holding onto land that can be annexed or pulled into the city somehow has value, but the difference is not worth the easement value.</p> <p>We were successful in Rounds 3 and 5 because we had landowners that made the choice based on heart, legacy and succession Section 3: Planning Grants and in the case of the Brazelton's a lot of hard work to understand title and legal parcels that showed the value in the CE that allow for the purchase of land to bring back in to the Family ownership. What I see is SALC has guidelines and needs to meet while landowners have a whole different reason and path in getting to the willing seller decision and with continues changes and outcomes per the funding it becomes harder and harder for a land trust like Solano to participate. The depth of SALCs goals are lost on landowners and I have to fill in the blanks and after that , the value is too low.</p> <p>Allow land trusts to bring projects with willing sellers that meet risk levels for GHG and VMT and show the continues success. I don't think creating goals and guidelines to force projects to meet the goals is the best solutions.</p>
Solano Land Trust	General		<p>I talked with Jeanne Merrill, with CalCAN yesterday and even though she did not ask for land trusts to sign on to their letter I did say I support much of that is listed, but that I have not had enough time to really dive into the changes and understand them. If the guidelines are approved I will be a participant in the best way Solano Land Trust can and that may mean the projects I have will not score or rank well. I would like to ask for more time, another group discussion or something that gave more time to review, discuss and respond.</p>

Commentor	Section	Topic	Comment
Sierra County	Section 2: Agricultural Conservation Acquisition Grants		<p>Sierra County remains very concerned over the guidelines and the potential impacts that the program will have on sustainable agriculture in Sierra County and in particular Sierra Valley, on existing Land Conservation Contracts and Farmland Security Zone contracts that may be unknowingly placed in a breach status, and on a number of other administrative issues including CEQA compliance. In 2019 the County and the UC Agricultural Extension Office sponsored a community meeting at Calpine, Sierra County and later, a staff workshop in Quincy, California and in both cases, representatives of the Department of Conservation were in attendance. At those meetings, Sierra County officials were assured that concerns and actual impacts to property owners that had occurred (due to the execution of easement acquisition, farmland acquisition, and conservancy restrictions caused by the DOC sponsored programs) would be recognized and guidelines would be amended accordingly to avoid any future conflicts. The County provided comments in 2020 and early this year in February due to the realization that nothing had changed in the application process that resolved any of the stated concerns.   It only makes good sense that the Department would want to know if an easement or acquisition would place an existing local government Land Conservation Contract of Farmland Security Zone Contract into a breach status. Likewise, it only made good sense that the Department would want to resolve local County General Plan conflicts created by an easement, acquisition, or other entitlement offered through its programs. Finally, it would make sense that the Department would be active in assuring that the County is involved in the required review under CEQA to assure the avoidance of any identified impacts. What we have discovered in reviewing these draft guidelines is that none of these concerns and recommended changes to program guidelines were addressed nor implemented.   Pre-proposals need to require, at minimum, letters from local government containing its approval and its assurance that contract breach conditions (Williamson Act) or serious issues with its existing land use program have not been created as a result of a proposed easement or farmland acquisition. By simply requiring an applicant to show evidence it has provided a letter to the County Section 3: Planning Grants Director is essentially meaningless without conditions. The guidelines are silent on DOC resolution of conflicts that the County Section 3: Planning Grants Director may outline or identify. Equally concerning is the lack of</p>

Commentor	Section	Topic	Comment
			<p>any clear and effective role for local government in the CEQA process involved in providing compliance with required environmental review. Please amend these guidelines to reflect these comments and to conform to the assurances that were given to the County in previous years and after clear recognition by DOC staff of the conflicts that could occur. This is not too much to request and is a fair compromise to assure that local government is a functional and appropriate part of your grant process.</p>
Sierra County	Section 2: Agricultural Conservation Acquisition Grants		<p>Cause for concern: There exists language in the acquisition or easement documents that when implemented, will reduce agricultural use on a given piece of property and over time creates serious concerns fro the sustainability of agriculture in the region</p>
Sierra County	Section 2: Agricultural Conservation Acquisition Grants		<p>Cause for concern: There exists no obligation for any party involved in negotiations (DOC, the landowner, any involved land trust organization, etc) involving land or easement acquisition to consult with local government during the process.</p>
Sierra County	Section 2: Agricultural Conservation Acquisition Grants		<p>Cause for concern: There exists no mechanism presently to address impacts created by the program through the process outlined under CEQA. As a result, consultation, notice, and appreciation for the potential impacts of the funding for, implementation of, or otherwise consideration of an agricultural acquisition or easement is not a part of the process, leaving the County to often become involved, if at all, well after negotiations have occurred and likely been completed.</p>
Sierra Foothill Conservancy	General		<p>Thank you for this opportunity to review and submit public comment to the Department of Conservation's 2020-2021 Round 7 Grant Guidelines &amp; Applications. Sierra Foothill Conservancy to date has protected three properties composing 10,858 acres of working rangeland by leveraging over \$5,00,000 in agricultural conservation easement acquisition funding from the Department of Conservation's SALC Program. Sierra Foothill Conservancy (SFC) Is eternally grateful for the DOC SALC Program as It has Increased the pace and scale at which were able to protect agricultural land, in particular working rangelands.</p> <p>It's Important to add that SFC is continually impressed with the DOC SALC staff; their support, efficiency, knowledge and relationship management always exceeds our expectations, and they are a pleasure to work with.</p>

Commentor	Section	Topic	Comment
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants		The overall application process for Section 2: Agricultural Conservation Acquisition Grants is simple and straightforward and we appreciated the pre-application and feedback stage, as this saves immense time for SFC staff and participating landowners.
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants		SFC also appreciated the ability of the SALC Program Guidelines to assist us In Implementing land protection equitably across our service region, which spans from Yosemite National Park to Kings Canyon National Park, beginning at the Sierra crest and extending west to CA-99, encompassing Mariposa and portions of Merced, Madera and Fresno Counties.