Sustainable Agricultural Lands Conservation (SALC) Program (2018-19 draft Guidelines)

Easement and Strategy/Outcome Elements Comments on Draft Guidelines

Comment Number	Comment Date	Comment Type	Comment Category	Public Question/Comment
1	10/25/2018	Policy	Selection Criteria	It is helpful to have the scoring criteria clearly outlined for the program. We appreciate this change to the program. However, we find some of the draft selection criteria to be duplicative. For example, several selection criteria highlight the co-benefits of soil and water conservation management. We suggest condensing that into one selection criteria. We also strongly encourage prioritizing the selection criteria to better reflect the aims of the program, which are to protect agricultural lands at risk of development and reduce related greenhouse gas emissions. We support the other co-benefits of the selection criteria but suggest simplifying and clarifying as much as possible to provide better guidance to the applicants. We suggest dropping the following criteria because it is duplicative of the environmental co-benefits criteria: (1) The property incorporates or is in the process of incorporating on-farm conservation management practices that build soil health for soil carbon sequestration. (2) The property incorporates or is in the process of incorporating on-farm conservation management practices that improve water use efficiency, conservation and reduction, increase use of recycled water, support groundwater recharge or reduce reliance on groundwater. We suggest dropping the following criteria because it is duplicative of the eligibility criteria that states, "The proposal will support the implementation of an adopted or draft Sustainable Communities Strategy or, if a Sustainable Communities Strategy is not required for a region by law, a regional plan that includes policies and programs to reduce greenhouse gas emissions." (1) Protection of the property is part of a Conservation Area Protection Plan, regional conservation program or mitigation program.
2	10/25/2018	Policy	Funding/Appraisal	We suggest that the Department consider establishing a Reserve Fund that would increase the grant amount in the event the appraised value is greater than the value estimated in the application. When an applicant submits a preproposal or a full proposal, an appraisal has often not been completed so the easement value is an informed guess. Because of the cost of the appraisals, land trusts typically wait until funding has been approved to incur this expense. Thus, the amount approved by SALCP may not be adequate to cover the easement purchase and yet SALCP cannot increase the grant amount after the fact. Having a Reserve Fund to help bridge the gap would be very helpful and make it possible for more producers and land trusts to participate in the program.

3	10/25/2018	Policy	Match Funding	There are very few funding options for agricultural conservation easements outside of SALCP. There are limited federal funds available through USDA's Natural Resources Conservation Service and some funds available for rangeland projects through the state Wildlife Conservation Board (WCB). We are unsure of how much bond funding will be available for the CA Farmland Conservancy Program. Some regions of the state are better able to make up for the gap in public funds with private donations, but for critical regions of the state, especially the Central Valley, private funds for farmland conservation are scarce. We strongly suggest that the Department lower the match requirements for all projects to 10 percent, but require that all applicants demonstrate that they have adequately pursued other sources of funding (state, federal, private). We also suggest that the Department aim to have a balanced portfolio for cropland and rangeland projects, so to not favor those projects that may more readily have matching funds available (e.g. WCB funds for rangeland projects).
4	10/25/2018	Policy	Fee Acquisition	In some parts of the state where the development pressures are especially high, farmers are not interested in conservation easements on their land, but want to sell their land out right. Land trusts can play an important role in keeping that land in agriculture by doing fee acquisition projects. These can be expensive projects, but we suggest here that the Department consider allowing fee acquisition projects to be eligible under SALCP because of the value of those projects to maintaining agriculture in sprawl prone areas. But we suggest limiting the funding available to those projects at the same funding level that would be available to the applicant if they were applying for an easement. The aim here would be to avoid oversubscribing SALCP funds to a limited number of fee acquisition projects.
5	10/25/2018	Policy	Eligibility	Only land trusts are eligible for Terra Firma or other insurance for their easements. Special districts, like open space authorities, that hold easements must find other means to defend their easements, such as having a reserve fund. We suggest changing the program guideline language to read the following, "The grantee has acquired Terra Firma insurance for the easement or provides alternative means sufficient to defend the easement."

6	10/25/2018	Policy	Planning	Since the Strategy and Outcome (S&O) grants were established in the second year of SALCP, the number of local governments applying for these funds has greatly diminished. We understand that no local government applied for S&O grants this year. The granting program unpopular with local government after the state required strict pay-up-front requirements for the grants, which has since changed in recent years. Additionally, the S&O grants gave little flexibility in how local governments would pursue improved farmland conservation mapping, planning and policy development. We suggest renaming the program to the Farmland Conservation Local Government Grant (FCLG) Program. Furthermore, we suggest revising the requirements of the program to better align with the realities of local government, while still supporting improved farmland conservation outcomes. We describe this more below. Changing the program requirements without changing the name we fear will not sufficiently change local government perceptions of this program. Rebranding is necessary to attract local government interest in the program. We are not tied to our suggested name, but offer it as one option to give clarity to the aims of the program.
7	10/25/2018	Policy	Planning	We suggest that revised FCLG program aim to incentivize local governments to do a better job of identifying their agricultural land assets in their jurisdictions and how they can improve farmland conservation over time.
8	10/25/2018	Policy	Planning	We suggest that a range of local governments be eligible, including city and county government, Local Area Formation Committees (LAFCOs) and special districts working on land use issues (e.g. the open space and agricultural authorities in the state) - all of which can directly impact farmland conservation (or conversion) in their region.
9	10/25/2018	Policy	Selection Criteria	We suggest that applicants, which include more than one local government partner, receive higher points than those with just one local government applicant. This will encourage greater coordination across jurisdictions, which is necessary to enhance farmland conservation policy and practice.

10	10/25/2018	Policy	Planning	As far as eligible project types we suggest the following (which we pulled from the first year of the program): (1) Delineation of agricultural lands with the greatest local priorities for conservation, decreased GHG emissions, or those that may result in enhanced carbon sequestration. (2) Community consensus-building to develop a strategy for agricultural land preservation. (3) Development and adoption of a new farmland conservation policy for the region, which may include an agricultural land mitigation program or a county or city agricultural element, conservation element, or other similar policy documents. (4) Development of potential agricultural conservation easement projects by conducting appraisals, surveys, title review, and other activities directly related to the funding application and acquisition. We believe that these project types will allow for a diversity of projects and will enhance local government efforts to address land use policy and practice that may improve farmland conservation.
11	10/25/2018	Policy	SALC - Third Phase	We support the Department in developing the "third phase" of SALCP, first proposed 2014, to include on-farm management incentives to encourage farmers and ranchers with conservation easements on their land to improve management practices and reduce greenhouse gas emissions. We encourage the Department to work with Strategic Growth Council staff to hold a workshop no later than March 2019 to begin the conversation with stakeholders on this third and important phase of SALCP, which can help the state meet its ambitious, but necessary 2030GHG emissions reduction targets and the new carbon neutrality goals for 2045.
12	11/20/2018	Policy	Selection Criteria Fire	Consult with Cal Fire and coordinate SALC efforts with their Fire Prevention Grants, California Improvement Program and Forest Legacy Program. Cal Fire programs address forest health through conservation easements and forest health grants, but those programs do not necessarily prioritize the Wildland Urban Interface (WUI), much of which is rangeland with a component of chaparral and/or oak woodland, a landscape type that does not fit well into the Cal Fire programs. The SALCP can be a tool to improve fire resiliency on land in the WUI outside forestland. "The property is strategically located in an area that would add benefit to a wildfire mitigation plan, a community wildfire protection plan, Cal Fire unit strategic fire plan, Cal Fire unit strategic fire plan, Cal Fire grant program, or Forest Legacy Program."

13	11/20/2018	Policy	Selection Criteria Fire	SALCP incentivizes conservation of the WUI. The program is a great tool to limit residential expansion into the WUI. Priority should be given to SALC properties that are in Priority Landscapes, thus reducing residential expansion into areas of California that are susceptible to devastating wildfire in communities. Cal fire has mapped Priority Landscapes for Preventing Wildfire Threats for Community Safety. Much of this area is within the 2-mile threshold of the city sphere of influence outlined in the SALC guidelines. This is a way for the Department of Conservation through the SALCP to provide strategy for the guidance document "Fire Hazard Planning General Plan Technical Advice Series" outlined in SB 901 (Wildfires); whereas, the guidance document shall include specific land use strategies to reduce fire risk to buildings, infrastructure, and communities. California Air Resources Board's Co-benefit Assessment Methodology for Climate Adaptation addresses wildfire prevention, but this methodology has not been prioritized in the SALCP. The SALCP can supplement Cal Fire programs, but concentrate in the WUI where fire prevention activities have the greatest potential in saving lives and property. "The conserved property would act as or add to a community separator between a high fire danger landscape or prevent residential expansion into a high fire danger landscape."
14	11/20/2018	Policy	Quantification Methodology Fire	Provide GHG benefits from preventing wildfires in the calculator. SB 901 (Wildfires) requires the Air Resources Board to develop a historic baseline of greenhouse gas emissions from California's natural fire regime reflecting conditions before modern fire suppression, and a report that assesses greenhouse gas emissions associated with wildfire and forest management activities. In addition, the avoided emissions from fire suppression efforts, to rebuild residential housing units, municipal infrastructure, commercial structures and other recovery efforts should be considered as a direct greenhouse gas reduction benefit.

15	11/20/2018	Policy	Selection Criteria Fire	Agricultural operations may be one of the few options we have to maintain the WUI cost effectively. Programs already exist that use managed grazing at municipal greenbelts, such as in the City of Rocklin. Managed grazing on large sections of land at the margin between the community and the fire prone landscape will manage the vertical and horizontal continuity of woody fuels and reduce the biomass of flash fuels such as dry grass. Irrigated pasture or crop production in strategic areas will have an added effect on managed fuel break. California Air Resources Board's Co-benefit Assessment Methodology for Climate Adaptation addresses potential measures for wildfire mitigation in Table 6, page 9 of the assessment. The table can be altered to specifically address management unique to agricultural land with a focus on fire prevention and landscape resilience at the margin between the community and the fire prone landscape. SB 901 (Wildfires) establishes that for any conservation easement purchased with state funds on or after January 01, 2019, wherein land subject to the easement includes some forestlands the landowner shall improve forest health, including oak woodlands, so that the forests are more resilient to wildfire. AB 1956 (Fire prevention activities: local assistance grant programs) established that the creation of defensible space and grazing shall be considered a fire prevention activity that reduces the risk of wildfire. "The property incorporates or is in the process of incorporating on-farm management practices that improve fire prevention efforts within the community and adds to the community scale fire resiliency, such as managed grazing, forest health improvements, irrigated pasture or crop production that will act as managed defensible space for the community."

16	11/20/2018	Policy	Selection Criteria Fire	In addition, inclusion of fire-related co-benefits can be included. For example: Environmental Co-Benefits - Preventing catastrophic, high intensity, wildfire will provide environmental co-benefits in these areas: o Protection of land of special environmental significance o Improved air quality resulting from avoided vehicle miles traveled and prevention of wildfires o Protection of watershed health and prevention of erosion due to high intensity wildfires o Protection of source water o Protection of ecosystem services (e.g., wildlife habitat and corridors, pollination, and natural food web adaptation) o Protection of open space and viewsheds o Potential for additional carbon sequestration via conservation management practices o Protection from carbon loss due to catastrophic, high intensity wildfires Economic Co-Benefits - Preventing catastrophic, high intensity, wildfire will provide economic co-benefits in these areas: o Reduction in spending and rebuilding of municipal services due to wildfire o Reduced risk of commercial structure loss due to wildfire o Reduced risk of housing loss due to wildfire Public Health Co-Benefits Preventing catastrophic, high intensity, wildfire will provide public health co-benefits in these areas: o Reduced risk of wildfire-related air quality issues o Reduced risk of community-wide trauma due to wildfire
17	11/30/2018	Clarification	Eligibility	The Accreditation Commission strongly supports the proposed eligibility criteria that nonprofit organizations must be accredited by the Land Trust Alliance,* have adopted equivalent or greater policies, or have applied with an accredited co-applicant. *Note that the Land Trust Accreditation Commission is the official name of the organization that grants accreditation. The Accreditation Commission is an independent subsidiary of the Land Trust Alliance. The draft guidelines will help protect the State of California's investment and are supported by a recent report published by the Commission showing accredited land trusts outpace those groups that are eligible for accreditation but not yet accredited. The report includes the following findings which make us confident accredited land trusts are strong partners for the State: (1) Accredited land trusts have 8 times more money dedicated to stewarding and defending their conservation holdings forever. (2) They have demonstrated they monitor each of their conservation easements each year. (3) They have secured baseline documentation reports for every easement.

18	11/30/2018	Policy	Stewardship	Accredited land trusts must meet our requirements for stewardship and defense funding. Given the importance of this funding to ensuring the State's investment is protected forever, the Accreditation Commission supports a revision to the draft guidelines allowing a reasonable contribution to stewardship and defense funds to be an "eligible associated cost" if allowable under California law. The Commission is pleased the State of California recognizes the rigor of the land trust accreditation program. The Accreditation Commission only awards accreditation when it has verified a group meets national quality standards. The assurance is maintained by requiring renewal of accreditation every five years through a process that is equally as rigorous, and by our ability to confirm compliance at any point during the five-year term.
19	11/26/2018	Policy	Priority Populations	Suggested rural/low income set aside or specific program target of 20%. A significant portion of the state's natural and working lands exist in rural Low-Income Communities of the state, as defined by AB 1550 (Chapter 369, Statutes of 2016). Because of this, climate investments in these areas offer the opportunity to boost resilience to future climate conditions on natural and working lands and inject much-needed funding into Low Income Communities. We recommend creating a low income and/or rural set-aside and/or target of 20% or greater than the amount required by CARB guidelines and SB862 on allocations to Low Income and Disadvantaged Communities. Although such real communities exist in a geographic majority of the state, AB 1550 requires a minimum of only 5% of proceeds to be invested here, due to the majority population densities of Urban Disadvantaged Communities. The grant guidelines for this program should expand the total amount of awards given to low-income/rural communities to reflect the geographic majority area of rural poverty that is not designated as Disadvantaged Communities, including the North and Central Coast, Inland Empire, Sierra Nevada and other regions.

20	11/26/2018	Policy	Fee Acquisition Eligible Costs	Suggested addition of fee title acquisition to list of eligible costs. Fee title (or fee simple) acquisition is an important method used by many agencies and conservation organizations to preserve natural resources, especially those with high conservation value. According to the Public Resources Code, Section 75212 (h) authorizes the Strategic Growth Council to invest in projects that meet the goals of SB 862 through the "acquisition of easements and other approaches or tools that protect agricultural lands that are under pressure of being converted to nonagricultural uses, particularly those adjacent to areas most at risk of urban and suburban sprawl or those of special environmental significance." The SALC program should allow flexibility for the full range of possible transactions that can enable conservation organizations to preserve land at the urban-wild interface, and specify fee title acquisitions as an eligible cost. For many types of agricultural land, including land with public access issues, fee title ownership is a very valuable preservation tool. Land trusts often purchase land in fee title for the purpose of continuing its agricultural productivity. In some cases, as when a seller will only sell through fee title, or when an easement negotiation may be particularly time intensive, technical, and complex, it is preferable to acquire land through fee title and then later transfer the land to a suitable owner with an agricultural conservation easement.
21	11/26/2018	Policy	Eligible Costs	We suggest explicitly including data collection, the use of spatial models, and training on how to use those models as eligible project costs for both strategy and outcome grants and easement grants. This will build the applicant's technical capacity and thereby facilitate project effectiveness.
22	11/26/2018	Policy	Selection Criteria Fire	We suggest modifying the category for proximity to dense urban areas. As we have recently seen, wildfires that begin in the Wildland Urban Interface (WUI) present a catastrophic threat to communities. The carbon emissions that result are massive. We must immediately identify and protect open space in the WUI that will stop the spread of fire into communities. The permanent protection of well-managed agricultural land is critical to this goal. Under the current draft guidelines, up to 10 points can be awarded to a proposal if the property is located within 2 miles of a city sphere of influence, or within 2 miles of a census designated place (CDP). We suggest that you increase points for projects that include agricultural open space buffers around any communities as a strategy to reduce the devastating impacts of urban/rural wildfire.

23	12/3/2018	Policy	Fee Acquisition	The current SALC Draft Guidelines include eligibility for two investment, or project, types: (1) Agricultural Conservation Easement Grants, and (2) Sustainable Agricultural Lands Conservation Planning Grants. There is no doubt that these investment types are critical to successfully conserve agricultural lands. However, in our experience fee acquisition is an equally important investment tool in areas where development pressure is high. In fact, not being able to offer a landowner a fee acquisition, as opposed to a conservation easement, will frequently prevent a transaction and ultimately result in development. Oftentimes the prior rancher or agricultural producer is interested in divesting completely from the property due to competing pressures on their business (e.g., prices of agricultural goods, long-term viability of the business, etc). In these cases, fee title acquisition is the only method by which to secure the long-term protection of the property and ensure it remains as agricultural land.
24	12/3/2018	Policy	Fee Acquisition	Because we understand that fee title acquisitions can be expensive, and it is important to support all the tools available to meet the goals of the SALC program, we suggest that the department identify a specific percentage allowance for the Fee Acquisition Investment Type. By identifying a percentage of the total funds available in Fiscal Year 2018-2019, and any additional appropriations going forward, for fee acquisitions, the Department can guarantee investments in all the critical tools available while solidifying the ability to utilize fee title acquisitions where necessary. Additionally, to ensure that the land remains as productive agricultural land the Department could consider requiring that grantees put in place an accompanying agricultural lease that the new fee title owner would be required to enter into within a specified number of years after the acquisition.
				“The property is located within 2 miles of a city sphere of influence…” – This selection criterion is given the highest weight of all the SALCP Program project selection criteria. But it has no real relation to lowering GHG’s and also leads toward projects next to cities where

25	12/3/2018	Policy	Selection Criteria	land prices will generally be higher. Residential development next to existing cities should lead to shorter commutes and therefore lower carbon emissions, compared to developments 10, 20, 50 miles away. Why award extra points to projects that will have lower GHG impacts and will cost more per acre? This is not to say that conservation in these sites is not important for other reasons, but it is a funny use of cap and trade dollars when it does not help lower GHG levels. “The agricultural conservation easement would act as or add to a community separator between two communities or a green-belt along the edge of a single community.” – This criterion further reinforces the bias created by the above criterion – leading to purchasing expensive easements next to cities that may have more limited impacts on GHG levels. Land near cities or between cities will score well on both these criteria. But that does not mean there will be any additional benefit in lowering GHG’s. In fact, perhaps the opposite. These two criteria are worth almost 20% of the points awarded in the scoring criteria and they will lead to more expensive land with lower GHG impacts. Again we are not saying that community separators or greenbelts around cities are bad things. It's just that their creation may not help achieve AB32 goals. The SALC program guidelines say, "The principal goal of the SALC program is to further the purposes of AB32.." These criteria award more points for projects that will usually be more expensive and will skew the scoring too greatly toward criteria that may actually have little to do with emissions. If the costs of a project are very high, either in terms of cost per acre or cost per metric ton of carbon, at the very least consider reducing the SALCP portion of the total project cost and requiring more match.
				“The project avoids a greater number of GHG emissions per acre than projects that propose to conserve comparable land uses within the pool of applicants evaluated this round.” – This criteria makes perfect sense for a program using cap and trade funding. However, if the measurement tool used to measure GHG’s is limited or even flawed, it will introduce a bias that may not lead to the selection of projects with the greatest impact on limiting GHG’s entering the atmosphere. One of the chief problems with project selection today is that only a slice of the GHG impacts of a project are counted – the projected vehicle miles saved from commuters. Clearly, there are a range of additional GHG impacts, both decreases in emissions and increases in carbon sequestration, resulting from each proposed project

26	12/3/2018	Policy	Selection Criteria/ GHG Benefits	emissions and increases in carbon sequestration, resulting from each proposed project. VMT Reduction (Vehicle Miles Traveled) measures only one slice of the GHG impacts and, for some projects, it may not even be the largest slice. This measurement makes several assumptions and it's unclear and not very transparent how it's finally calculated. It seems to assume that the major direction of traffic will be from the project area to the nearest city. But of course it may be that future residents of a project area will commute to an even larger city farther away. Or, if the project is in a recreation area, surrounded by other protected land, there may be a significant amount of increased future travel in the opposite direction - from cities to the project site - if, without the easement, additional development were to occur in that recreational area. In addition, there are differences between agricultural easement projects in terms of their GHG impacts. For instance, a ranch project that protects extensive oak woodlands, in which the easement explicitly protects the trees, will ensure significant carbon sequestration from perhaps tens of thousands of growing trees. A ranch project in which the easement restricts conversion to cultivated agriculture will also avoid the emissions generated by turning the soil and by all the farm equipment that regularly criss-crosses cultivated fields. These are not controversial statements. Everyone knows there will be a carbon benefit from this kind of restriction in the easement. But the program currently does not measure or count these carbon benefits, creating a bias against ranch projects in the scoring. (We are pleased that the SALC team decided to eliminate the new rule, created in year four of the program, that would not allow any restrictions on agriculture in SALC easements. If a rancher wants to use the easement to restrict cultivated agriculture, this new rule's only impact on GHG's would have been to increase emissions.) These other GHG benefits should be recognized somehow in the scoring, whether an approved protocol to measure them has been developed or not. (CARB already has an approved protocol for measuring carbon sequestration gains due to protecting forests. A CalFire conservation easement grant program, funded by cap and trade dollars, has been using this protocol for several years - we have been involved in one of those projects. It seems like this could be modified to cover oak woodlands. And an estimate of the emissions from farm equipment seems like it could be a relatively simple thing to measure, using a slightly modified version of the protocol used for avoided vehicle miles.) We understand the importance of trying to measure these impacts and we appreciate the fact that additional CARB-approved protocols have not yet been developed to measure these other GHG impacts. But there has to be a way of taking these into consideration – see next bullet point below - especially when they may be very significant. Whether a protocol has been developed or not, the project selection criteria should recognize these additional GHG benefits.

27	12/3/2018	Policy	Selection Criteria	"The property incorporates or is in the process of incorporating on-farm conservation management practices that build soil health for soil carbon sequestration." – We applaud the inclusion of this criteria and the recognition that additional GHG impacts, beyond VMT Reduction, can result from a SALC Program project. This criteria is a step in the right direction, acknowledging the existence of other GHG impacts and awarding points to relevant projects in the scoring process, even when no protocol has been developed to quantify that impact. However, it seems strange that this is the only other GHG-reduction impact that is specifically mentioned and awarded points in the project selection criteria. There are a number of others, as noted above, and they should be recognized in the project selection criteria as well.
28	12/3/2018	Policy	Match Funding	Matching funds – We think it is important to leverage SALCP funds through some type of match. But we recognize that finding the match is always a challenge. Consider a simple scoring system that provides more points for match – perhaps some kind of scale, with a few different point levels based on the percentage of match. This approach could even be developed so that match was not required at all, but would still be taken into consideration.
29	12/3/2018	Policy	Management Plan	Management Plans - We do encourage drafting easements that require developing and following management plans. This will further ensure that landowners will use best management practices and reduce emissions and stimulate carbon sequestration going forward. All of our easements have required management plans and the landowners have been fine with this.
30	12/3/2018	Policy	Priority Populations	"SALC Easement applications where a portion of the project is located within a priority population area as shown in Appendix C are eligible to receive 100% funding and five points toward their applications score. SALC acquisition applicants found to qualify for priority population status will receive an additional five points on their application" All of SFC's SALC funded projects have been located in Disadvantaged Communities, we're grateful that moving forward, consideration in points and funding will be included for this criteria in relation to ACE projects.
31	12/3/2018	Policy	Priority Populations	"Easement Acquisition Cost: Competitive grants will be awarded to cover up to 75% of the value of the agricultural conservation easement. Easement acquisitions that both: i) predominately include prime farmland or farmland of statewide importance, as identified by the Farmland Mapping and Monitoring Program; and ii) are located in a priority population area as shown in Appendix C are eligible to receive 100% funding for easement acquisition." All of SFC's SALC funded projects have been located in Disadvantaged Communities, we're grateful that moving forward, consideration in points and funding will be included for this criteria in relation to ACE projects.

32	12/3/2018	Policy	Associated Costs	"All projects approved for funding are eligible to receive up to $50,000 - in addition to the funding toward the easement value discussed above - in order to cover reasonable associated costs incurred to acquire the easement. The Strategic Growth Council will allocate up to $50,000 in associated costs funding for each awarded project, unless applicant specify a lower amount in their application. The Strategic Growth Council may increase a project's associated cost allocation, if it determines such costs are commensurate with the work needed to complete the project." SFC is thrilled to see addition and the flexibility it includes. Thank you to the DOC for their acknowledgement of the grantee's time and financial investment.
33	12/3/2018	Policy	Eligible Costs	"Fully-burdened applicant staff time for: easement negotiations, title work, project mapping, appraisal review and coordination, SALC required jobs reporting, Technical and legal consulting, Appraisal, Preliminary title report, Baseline conditions report, Escrow fees, Title insurance fees, Property boundary survey(s), Building Envelope survey(s), Environmental site assessments(s), Mineral remoteness evaluation(s), Tribal consultation(s)." SFC is excited to see the continuation of funding for the above costs. Thank you to the DOC for their acknowledgement of the grantee's time and financial investment.
34	12/3/2018	Clarification	Selection Criteria	"The conserved property would act as or add to a community separator between two communities or a green-belt along the edge of a single community." Thank you for adding clarity as to the difference between the term "community separator" and "green-belt".
35	12/3/2018	Policy	Conditions of Funding	"For projects on agricultural lands not in cultivation, such as pasture and rangeland, restrictions will only be allowed if the primary purpose for which the easement is being sought is consistent with continuing agricultural use, if the restrictions do not substantially prevent agricultural uses on the property, and if the nonagricultural qualities that will be protected are inherent to the property." Thank you to DOC for recognizing the importance of protecting working rangeland and ranching. Preventing rangeland conversion to cropland is critical for sustaining ranching and the ranching economy in California. The public benefit and ecosystem services provided by protecting working rangeland are diverse and include everything from air and water quality, water quantity, groundwater recharge, flood protection, fire protection, carbon storage, native - endangered - threatened species and their habitats. This change in the 2019 guidelines will assist in expediting timelines to bring ACE projects to close.

36	12/3/2018	Policy	Minimum Deed Terms	"The Department has developed minimum deed terms specific to the SALC Program to address important terms and conditions that should be contained within each grantee's easement(s)." and "Grantees may choose to append the minimum deed terms to their easement or integrate the minimum deed terms into the easement body." Thank you for this addition and the flexibility it includes; while SFC and our partnering landowners liked the SALC Deed Template, minimum deed terms are preferable when DOC is not the primary funder.
37	12/3/2018	Clarification	Title Considerations	Title Considerations Pg. 15- In this section DOC provides three acceptable resolutions for severed minerals. As an applicant this is extremely helpful for project readiness and eligibility.
38	12/3/2018	Policy	Housing	Removal of square footage limitation for Single Family Residences, Secondary Dwelling Units and Farm Worker Housing and instead consistency of square footage with grantee policy, local building codes and surrounding community. SFC supports this change.
39	12/3/2018	Policy	Public Notification	Removal of requirement for county Board of Supervisors Resolution of Support - With the removal of this requirement, SFC and other applicants throughout the state will not be limited by local politics; additionally, this will save applicants, substantial time.