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California Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Application Questions	whether or not a property is located within a designated habit or wildlife mitigation plan area should not affect the scoring or eligibility of a project given that this has no bearing on the agricultural viability or productivity of the property, therefore we suggest removing question "m." from the final application.
California Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Application Questions	In addition, although we support questions "i.-j.," supplying supporting documentation is not warranted and a narrative of on-farm conservation and management practices should simply suffice.
California Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Application, Risk of Conversion Summary Sheet	On the Final Application, the Risk of Conversion Summary Sheet and Supporting Evidence needs to be numbered correctly. The risk chart is currently number 8-14 and needs to be updated to the correct Risk Options 1-7. We would also suggest keeping the order of Detailed Characteristics of the Proposed Project questions in the final application in the same order as the pre-proposal questions, noting that there a few additional questions on the final application.
American Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Change Process	AFT recommends DOC also release a redline copy and or a summary of proposed changes to improve the public review and comment process. This will allow organizations with limited capacity to focus on the proposed changes and provide meaningful input to DOC during its public engagement efforts.
Yolo Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Change Process	A final request with respect to future changes – it would be most helpful to provide a redlined version, or a list of changes to make certain each change is vetted for the implications for furtherance of the program.
Sierra County	Section 2: Agricultural Conservation Acquisition Grants	Deed Language, Conflict with Local Government Priorities	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.
Sierra County	Section 2: Agricultural Conservation Acquisition Grants	Deed Language, Consult with Local Government	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 for the sustainability of agriculture in the region
CALCAN	Section 2: Agricultural Conservation Acquisition Grants	Deed Language, Minimum Deed Terms	Minimum Deed Language: Do not support the inclusion of Minimum Deed Terms We do not support the requirement that DOC's minimum deed terms (MDT) be for acquisition projects. We align our comments with many of the land trusts, like the CA Rangeland Trust and others, that have outlined their concerns about the MDT.
California Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Deed Language, Minimum Deed Terms	We do not support the requirement of using the minimum deed terms language. In our comment letter to DOC dated November 20, 2019, we outlined many specific concerns regarding the proposed language and still support those concerns and our urgent request to NOT adopt the minimum deed terms that will be retroactive for the fifth round of SALCP funding.
MALT	Section 2: Agricultural Conservation Acquisition Grants	Deed Language, Minimum Deed Terms	Minimum Deed Language. As outlined in our November 20 letter to DOC, we strongly urge you not to require the proposed minimum deed terms. Our comments and concerns are echoed by many of our colleagues and we hope that you will heed the counsel of the land trust community.
Yolo Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Deed Language, Minimum Deed Terms	The Yolo Land Trust previously expressed its concerns about the minimum deed restrictions in a letter dated November 1, 2020. We reiterate those concerns and would appreciate a full discussion on the changes rather than implementing them for Rounds 5 or 6.

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Solano Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Deed Language, Minimum Deed Terms	Do Not Support the Inclusion of Minimum Deed Terms We do not support the requirement that DOC's minimum deed terms (MDT) be for acquisition projects. We align our comments with many of the land trusts, like the Rangeland Trust and others, that have outlined their concerns about the MDT. (CalCAN letter)
California Farm Bureau Federation	Section 2: Agricultural Conservation Acquisition Grants	Deed Language, review of easement after 25 years	Farm Bureau also requests the inclusion of a contingency clause in contracts, similar to that which is within the California Farmland Conservancy Program, which allows for a review of a property's suitability in the Program twenty five years after its initiation. (*Editors note-footnote deleted*.)
American Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Deed Language	Based on feedback from multiple stakeholders, the proposal would benefit from more exploration on how the proposed Minimum Deed Terms (MDT) would be implemented and co-exist with other popular match funding sources. AFT recommends not implementing the MDT at this time. Should DOC wish to pursue the implementation of MDT, AFT would urge DOC to consider convening the Natural Resources Conservation Service and land trust partners to work to harmonize areas where the MDT as currently proposed, conflicts with other popular matching sources.
American Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Deed Language	AFT recommends DOC not implement the MDT on Round 5 approved projects. Implementing these on already approved projects, shifts the dynamic of trust for partners in land conservation and creates communication challenges for project stewards.
American Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Deed Language	If the MDT is adopted, AFT recommends, as it was pointed out in the public comments received by DOC at its public meeting on January 22, language in section "7 Annual Monitoring", should be revised to ensure clear coordination with Grantees before any access for monitoring is conducted by the state.
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Eligible Costs, Associated Costs	Per the "Eligible Costs" section on page 7 – regarding associated costs. SFC would like to thank the SALC Program for providing $50,000 in project development funding for land conservation projects. This type of funding is absolutely critical in our ability to deliver projects to closing on a more efficient timeline and increases the financial sustainability of the land trust community as we continue to conserve our most strategic agricultural lands.
CALCAN	Section 3: Planning Grants	Eligible Applicants	We support the Department's proposed changes to the eligible applicants for the planning grants to include a broader set of land-use stakeholders.
California Farm Bureau Federation	Section 3: Planning Grants	Eligible Applicants	Also, within the context of SGMA implementation, Groundwater Sustainability Agencies (GSAs) are not listed as currently eligible recipients for the Planning Grant component of the SALC Program. Given GSAs impact on local land use planning and resource availability, they may provide a unique perspective on areas most at risk of conversion based on changing hydrology and water allocations. Should they be eligible to receive grant funds under the Program, they may be able to identify land for priority conservation given the impacts of SGMA implementation and develop a groundwater basin-wide acreage conservation goal or target. This information with the water availability context, may buttress the work of local jurisdictions seeking similar objectives. Farm Bureau encourages the Department to broaden eligible recipients for planning grants to include GSAs.
The Trust for Public Lands	Section 2: Agricultural Conservation Acquisition Grants	Eligible Projects	We are pleased to see that the SALC program has included fee interests as a tool for working land protection in 2020.
The Trust for Public Lands	Section 2: Agricultural Conservation Acquisition Grants	Environmental Health Co-Benefits	Overall, we are pleased to see the continued use of cobenefits that emphasize the environmental, climate and fire reduction benefits of land conservation and protection including "protection of open space, viewshed, wildlife habitat, biodiversity, riparian corridor, habitat along an elevational gradient; reduction in the potential of catastrophic wildfire."
Solano Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Fee Title, Conditions of Funding	Fee title: Support inclusion of fee title projects; Need clarity on "Buy, Protect, Sell" projects. We are pleased that the Department of Conservation (DOC) is proposing to include Fee Title projects as

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			eligible under the acquisition funding for the program. This will be especially beneficial for farmland on urban edges where pressures to convert that land to non-agricultural uses make it more challenging to secure conservation easements but where fee title projects are still viable. While this is not Solano Land Trust's business model we support the proposed funding level at 75 percent of the conservation easement value.
California Farm Bureau Federation	Section 2: Agricultural Conservation Acquisition Grants	Fee Acquisition Conditions of Funding	The draft guidelines propose to include a new fee acquisition allowance as a part of the agricultural conservation acquisitions component. This would allow an eligible entity, including local jurisdictions, special districts, and nonprofits such as land trusts, to acquire ownership of an agricultural property for subsequent transference through a lease or sale to a private farmer. While Farm Bureau appreciates that the draft guidelines specify that the interim property holder must agree to lease or sell the property in the interest of maintaining its agricultural productivity, the guidelines are silent on the timeline upon which this sale or lease must occur. The guidelines are also silent on the consequences should the interim property holder not manage the agricultural parcel it's acquired. While we respect and appreciate the efforts of cities, counties, resource conservation districts and land trusts to help provide the capital necessary for fee acquisition and we share the ethic of farmland conservation, we do not have confidence that they are the appropriate entities to manage a productive agricultural property while lessees or buyers are identified. Without immediate transference of the property to a farmer, it is not an unlikely consequence that the land in question will be unmanaged. This will result in agricultural land being taken out of productive use and become subject to issues, such as pest and weed infestations, soil degradation, and eventually serve as merely open space or habitat. This would be antithetical to the Program's goals. Farm Bureau encourages the Department consider requiring a pre-closing transfer or post-closing transfer component to the draft guidelines. A pre-closing transfer requirement obligates the property to be transferred to a farmer or land manager with agricultural experience before the close of the contract and may be best facilitated by requiring that farmer/land manager to be a sub-applicant on the grant proposal. A post-closing transfer requirement would obligate the property to be transferred to a farmer within so much time from the close of the contract. In consideration of the latter scenario, Farm Bureau encourages the Department to require the initial grant proposal identify and commit to hiring an interim land manager with agricultural experience to maintain the property's existing agricultural productivity. These conditions are currently required under the U.S. Department of Agriculture's Environmental Quality Incentive Program (EQIP).
Yolo Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Fee Acquisition, Disposition of Property	This option may be beneficial to some land trusts. It deserves more discussion before its implementation.
CALCAN	Section 2: Agricultural Conservation Acquisition Grants	Fee Acquisition, Funding Percentage	Fee title: Support inclusion of fee title projects; Seek change in funding allocation; Need clarity on "Buy, Protect, Sell" projects. We are pleased that the Department of Conservation (DOC) is proposing to include Fee Title projects as eligible under the acquisition funding for the program. This will be especially beneficial for farmland on urban edges where pressures to convert that land to nonagricultural uses make it more challenging to secure conservation easements but where fee title projects are still viable. However, we suggest DOC consider determining its funding level for Fee Title projects by percentage of project value, rather than basing it on the easement value. DOC can set a percentage of the value of the project that the Department will fund. Conservation easements can be 40 to 50 percent of the value of fair market value of the property, with some regional variability. Given that, we suggest that DOC set a 45 percent funding level for Fee Title projects. This will ease the initial paperwork burden for the Fee Title projects.

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The Trust for Public Lands	Section 2: Agricultural Conservation Acquisition Grants	Fee Acquisition, Funding Percentage	The guidelines describe that the eligible cost for the fee acquisition is only up to 75% of the agricultural conservation easement value. It is atypical for a fee acquisition to include purchase of a conservation easement on the same property. We are unaware of any other funder that equates its contribution toward a fee acquisition to the value of a conservation easement. It is unclear what the rationale is behind this requirement, but it creates complications for every aspect of fee acquisition projects in regards to ownership, management, appraisal work, etc. Particularly in Southern California, where agricultural lands face the highest threat to conversion, fee acquisition is the predominant tool for conservation. We strongly recommend that the program cover up to 75% of the fee acquisition. If fee acquisitions are to be allowed, clarity is required regarding the program's ability to purchase existing structures on the property. We encourage that existing structures be included in the value of the property to be appraised and funded, again ideally at a level up to 75% of fee value. Allowing for building costs would enable grantees the flexibility to acquire properties with building that could serve as workforce housing, which would be consistent with program objectives.
MALT	Section 2: Agricultural Conservation Acquisition Grants	Fee Acquisition, Funding Percentage	We are pleased that DOC is proposing to fund fee title acquisition of agricultural land. Fee title acquisition will provide land trust with another tool to protect agricultural land, and will be particularly important as land trusts seek new ways to support the transfer of land to the next generation of farmers. We understand that DOC wishes to limit the state funding for fee title acquisition to the same percentage of value as an easement in order to equitably allocate funding between fee title projects and easement projects. However, we urge DOC to consider a more straightforward method of determining the level of DOC funding for fee acquisition projects. The current method requires participants to appraise an imaginary easement to determine the easement value. We are unclear about how a land trust would determine the terms of the imaginary easement, and the proposed guidelines requires that land trusts expend significant time and funds having the imaginary easement appraised. We suggest that DOC simply identify a percentage of the total fee value that program will fu nd. The appropriate funding level could be determined by averaging the easement-to-fee value of prior SALC-funded projects.
POST	Section 2: Agricultural Conservation Acquisition Grants	Fee Acquisition, Funding Percentage	We recommend that DOC determine a direct percentage of the fee acquisition cost rather than a percentage of an agricultural conservation easement for fee acquisition project funding. By using a percentage of an easement, unnecessary time and money will be spent on creating and appraising a fictional easement when this structure is not in place as part of the fee acquisition. With POST's farmland protection projects over the past five years, only once could an actual easement have been drafted near the time of fee acquisition. In practice, we find that farmers interested in acquiring property see value in having time to get to know the land before committing to the terms of an easement.
POST	Section 2: Agricultural Conservation Acquisition Grants	Fee Acquisitions, Reporting	Please also clarify if the annual reporting requirements for fee acquisitions continue in perpetuity, for the length of the grant period, or some other timeframe.
American Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Fee Title, Buy-Protect-Sell	AFT supports DOC offering more flexibility within the SALC program. A buy-protect-sell program has the potential to create a new set of tools for several entities and to create new points for land access for the next generation of farmers. AFT welcomes the opportunity to participate in the formation of a more descriptive program that would encourage and engage landowners and partners to support the successful implementation of this tool in California.
CALCAN	Section 2: Agricultural Conservation Acquisition Grants	Fee Title, Buy-Protect-Sell	Lastly, we suggest that staff provide more detail on how this new provision pf Fee Title project funding will work for "Buy-Protect-Sell" projects that allow land trusts to purchase farmland, place an easement on it, and sell it to those that will maintain the land in farming. This is another important

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			tool in the toolbox for conservation of farmland at the urban edge. But we ask for greater clarity as it relates to these projects. For example, there is a condition in the guidelines (pages 16 and 44) that "the buyer agrees to lease the property to one or more private operators for agricultural use or to sell the property to a private operator," but it is unclear what the expectations are around timing. Is there a certain timeframe by which the lease has to be in place or by which it has to be sold to a private operator?
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Fee Title, Conditions of Funding, water rights	Per the "Program Components" section on page 1 – regarding fee-title purchases. SFC supports this new aspect of SALC, as it will expand on extinguishing development rights, conserving agricultural lands, and reducing GHGs. However, one concern of ours is the requirement of retaining water rights. This is because we've been recently interested in the Wildlife Conservation Board's (WCB) Streamflow Enhancement grant program. For example, we've considered selling/dedicating water rights on an in-progress fee-title property for the purpose of increasing instream flows. SALC's restriction on retaining all water rights, in this particular case, may limit the implementation of streamflow habitat enhancements. We understand that water availability is a strong component of the SALC Program, but, having the option to dedicate water to instream flows and retain water resources for agricultural purposes may achieve several co-benefits in a single project.
The Trust for Public Lands	Section 2: Agricultural Conservation Acquisition Grants	Fee Title, Eligible Costs	Eligible Costs (p.7): The draft guidelines ensure that competitive grants will be awarded to cover up to seventy-five percent (75%) of the value of the agricultural conservation easement or the agricultural conservation easement value. In previous iterations, the program would cover up to 100% of the cost of the easement for projects within disadvantaged communities. Why has this match waiver been removed? We believe that there should be no match required for easements that qualify for priority population benefit status. On p. 14, the guidelines still describe how a project may have met the requirements for reduced match. Please clarify whether the match waiver may still be utilized by projects within and benefitting disadvantaged communities.
Santa Clara Open Space Authority	Section 2: Agricultural Conservation Acquisition Grants	Fee Title, Funding Amount	We are very pleased that the Department of Conservation (Department) is proposing to include Fee Title projects as eligible under the acquisition funding for the program. This will be especially beneficial for farmland on urban edges where pressures to convert that land to non-agricultural uses make it more challenging to secure conservation easements but where fee title projects are still viable. However, we propose a change in how the Department determines its funding level for fee title projects. Rather than basing it on the easement value, which will require additional expenditure and work to obtain an easement appraisal along with the overall project appraisal, we suggest an alternative method. We suggest setting a percentage of the value of the project that the Department will fund. While conservation easement values vary widely as a percentage of fee title value, a good starting point may be setting funding at a minimum of 50% of the fair market value of the property. We understand a 50% of fee title value funding level may present a challenge to some land trusts that have limited access to matching funding, especially for high cost acquisitions. One option may be to incentivize higher match amounts through scoring to help land trusts and other entities who may not have access to matching funds, but can still be competitive in other point categories.
Santa Clara Open Space Authority	Section 2: Agricultural Conservation Acquisition Grants	Fee Title, Lease or sale to private operator	The conditions for fee acquisitions state that title will be encumbered in perpetuity with covenants that run with the land, including "The property must actively be used for agricultural uses". This suggests an affirmative requirement to have farm operations the property, rather than just keeping the land available for farming (which is what the conservation easement program has been requiring). We suggest that the covenant on fee acquisitions require that the property remain available for farming but not require active farming. Acceptance in the agricultural community of affirmative requirements for agricultural productivity is still a relatively new concept that has yet to

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			receive widespread adoption. In addition, as mentioned above, affirmative requirements are not part of the existing easement program.
Indgo Hammond + Playle Architects, LLP	Section 1: Sustainable Agricultural Lands Conservation Program Introduction and Program Summary	GHG Reduction Potential	I have read the summary pages of the Draft 2019-2020 Program Guidelines for the Sustainable Agricultural Lands Conservation Program (SALC). I agree that the proposed program if properly implemented could provide significant green house gas reduction benefits. I do believe however that the type of agriculture permitted on the land should not be result in a reduced ghg storage ability. For example one of the allowed changes would be the conversion of pasture land to vineyard - a clean cultivated vineyard would store far less carbon than pasture land. One could also imagine the conversion of carbon sequestering forest land into enclosed cannabis growing facilities that are extremely energy consumptive. On the other hand conversion of corn fields to open field cannabis production would be a wash and should be allowed
MALT	Section 2: Agricultural Conservation Acquisition Grants	Management Plan Alternative Suggestion/Selection Criteria	We join our colleagues in recommending that, instead of employing the vague requirements in the proposed guidelines, DOC staff, Strategic Growth Council and the California Department of Food and Agriculture (CDFA), work together to identify the best way to incentivize climate smart agriculture practices on SALC-protected lands. For example, SALC projects on farms and ranches that employ climate smart agricultural practices should qualify for additional selection criteria points. Conversely, SALC projects recipient should receive extra scoring points when they apply to CDFA for climate smart agriculture funds. DOC could require that land trusts applying to SALCP provide their landowner partners information about climate smart agriculture programs and technical service providers in their area. There are many ways to link existing state programs to encourage climate smart agriculture management practices, and we urge you to work with your sister agencies to develop a collaborative approach to incentivizing sustainable management practices on easement-protected land.
American Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	the proposed Guidelines require management plans on projects proposed on non-cultivated lands. It is important to note that AFT has been actively engaging in several venues addressing the inclusion of conservation management plans in PACE programs. While AFT supports DOC's proposal to connect applicants to funding to help offset the cost of developing a sustainable management plan for the property, it does not however, support a conservation management plan requirement as a condition contained within an easement deed. AFT recommends that the SALC program, and any associated conservation management plans, be structured as a voluntary incentive. To support this effort, AFT encourages continued coordination with the California Department of Food and Agriculture to further strengthen the link between California's climate investments on protected farm and ranch lands through Climate Smart Agriculture Program.
CALCAN	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	Sustainable Management Plan: Drop management plans; Support establishment of the "third phase of SALCP" - conservation incentives. We support improved farm management to further the goals of climate smart agriculture and overall improved stewardship of water, soil and biodiversity resources. However, as written, the proposed requirement for "sustainable management plans" lacks any specificity about what those plans should include, how they are developed, with what goals and how they are implemented. In the SALCP workshop, DOC staff made clear that that sustainable management plans would only have to be updated every ten years. If that is the case, what are the goals? Why would we ask a producer to develop a plan that is not an active part of informing the management of their operation? Furthermore, we are not clear why the plans would be only for rangeland projects and not all SALCP projects.Instead, we recommend that DOC staff, with SGC partners, like CDFA, return to an earlier SALCP program discussion of incentivizing climate smart agriculture practices on SALCP protected lands. Forexample, if a proposed SALCP project is on farmland where the landowner has an existing Climate Smart Agriculture project or related NRCS-

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			funded conservation project, the SALCP project could qualify for additional selection criteria points. Additionally, DOC could require that land trusts applying to SALCP make available to their landowner partners information about Climate Smart Ag programs and related technical service providers in their area. It could be as simple as including that information on their websites, giving out program flyers at meetings, etc. Moreover, SALCP project recipients could receive extra scoring points when they apply to CDFA for their Climate Smart Agriculture programs.There are many ways to create bridges across state programs to further the goals of expanding climate smart agriculture management practices that reduce greenhouse gas emissions and improve resiliency. But for now, we cannot support state funding to develop ill-defined management plans that will only be updated every ten years. We can do better. We strongly urge DOC to begin the conversation that many of us have been seeking on SALCP's "third phase" since the program was launched.
California Farm Bureau Federation	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	The current draft guidelines propose to require and partially fund the development and imposition of Department-approved sustainability management plans as a condition of the Agricultural Conservation Acquisition component. While Farm Bureau acknowledges that implementing U.S. Department of Agriculture, Natural Resources Conservation Service (USDA-NRCS) practices have environmental benefits, we are concerned that requiring practices as a condition of participation will discourage enrollment by the grower community. These practices are continually changing based on new science and may not be applicable on certain properties. Additionally, several of the USDA-NRCS practices are already included as co-benefits within the selection criteria. Farm Bureau suggests removal of the mandatory sustainability management plans as a condition of eligibility.
California Rangeland Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	We do not support the requirement of a management plan which is essentially telling a landowner how to manage their land. Our proposed easement projects are selected, among other attributes, because they are well-managed.
California Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	We do not support either a required or optional Sustainable Management Plan as a component of a project to be eligible for funding. Many farms already incorporate farming practices that protect natural resources. Prescribing a plan that a farmer must conform to is impractical. CFT would support incentive-based programs and would offer to assist DOC in crafting what that may look like if that is an option.
The Trust for Public Lands	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	Does the Department plan to provide a template or example of a Sustainable Management Plan that applicants may utilize in the development of their plan?
MALT	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	Marin Agricultural Land Trust (MALT) easements require that the land remain in agricultural production pursuant to an agricultural management plan. While we strongly support best management practices, we are concerned about the new SALC requirement that all projects have management plans that prescribe specific management practices. The proposed requirement for sustainable management plans lacks any specificity about what those plans should include, how they are developed and how they are implemented. As a land trust that employs agricultural management plans, we are unclear about whether MALT's management plans would meet DOC's requirements or require a second management plan. As noted by Mr. Delbar during the January 22 meeting, for these reasons, NRCS has moved away from a strict agricultural management plan requirement.
Yolo Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	The Sustainable Management Plan referenced on page 7 is for non-cultivated lands only. The Yolo Land Trust does not support this change in the guidelines. If there are problems on non-cultivated lands that need to be addressed, further discussion among the land trust community on the most practical and efficient way to solve them would be warranted.

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Yolo Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	Moreover, unless there is evidence that these plans improve the agricultural productivity of non-cultivated lands, the plans are not needed. Management plans will also add multiple burdens on land trusts to prepare, update, monitor and enforce compliance if necessary.
Yolo Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	The Yolo Land Trust also would not support adding this requirement to cultivated lands.
POST	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	For the sustainable management plan, please clarify a specific land use and number of acres of non-cultivated land for which this is required. Areas of a property with predominantly native vegetation should be excluded from a mandatory management plan.
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	Per the "Eligible Costs" section on page 8 – regarding management plans. SFC is not necessarily surprised at SGC's interest in sustainable management plans, for many other funders require them. However, it would be helpful for the land trust community to understand why this has arisen. What is it about the current program guidelines that are lacking that they think a management plan would fulfill? Often, agencies lean toward management plans because they want to require management actions for enhancement and/or monitoring protocols, beyond the traditional scope (i.e. annual easement monitoring and reporting). These can be problematic as funding is not provided to the land trust or the landowner to achieve actions beyond what is detailed in the current minimum deed terms. Additionally, we were surprised at the fact that only non-cultivated lands were required to have management plans. It seems completely unfair and the reasons for this described on the call were not adequate to warrant this uneven application of a new requirement.
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	If management plans are to be a requirement going forward, SFC would like thank the SALC Program for proposing to provide $10,000 in development funding. We understand that the SALC Program is providing such funding to better equip the land trust community as most needed. On another note - SFC's experience in developing management plans stems from our qualified staff and years of mitigation background. However, for other land trusts that do not possess this capacity, we may see it as a challenging requirement to fulfill. Overall, we'd strongly suggest that you hold off on the management plan requirement for at least the next year until the land trust community, DOC, and SGC can holistically discuss the underlying reasons for this new requirement and its implementation going forward.
Solano Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	We do not support the requirement of a management plan which is essentially telling a landowner how to manage their land. In addition, management plans increase the cost of completing an easement and require updating every 5 to 10 years as best management practices evolve incurring additional costs. The offer of $10,000 for the completion of a management plan helps defray the expense up front and should be offered to those landowners who want to voluntarily develop a management plan. We would also note that the 2018 Farm Bill removed a similar requirement due the issues raised by the national land trust community. We support more engagement on SALCP's "phase three".
Sonoma Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	We support the Department's intentions of wanting to ensure that its investments in conservation are managed in a sustainable manner for the benefit of our essential air, water and soil resources. However, the requirement for completion of a Department-approved sustainable management plan prior to closing will delay, if not impede, completion of important agricultural conservation projects that would advance the Department's goals.
Sonoma Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	Timing. Completing and obtaining Department approval prior to escrow could delay projects to the point that the landowner walks away from the project. Developing management plans takes a lot of time and requires that a landowner be ready, with known goals and ideas of how to fund implementation. In my experience, some negotiation is needed when developing a management plan, which can be challenging when also negotiating a conservation easement. The ability to get

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			the plan completed and to the Department in time to approve prior to closing will delay projects by months, if not a year. This extended timeframe will result in less interest, in general, by landowners in working with land trusts to protect their land, as well as more potential for a landowner to give up and walk away from a conservation project.
Sonoma Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	Expertise. There are few local entities with the experience in writing plans that adhere to the specific set of best practices required by NRCS. Finding a consultant who has the expertise and the time to do this work will be difficult and can add to the amount of time this task takes, delaying closing and tampering enthusiasm.
Sonoma Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	Complexity. Adding an additional document (a management plan) to address what the conservation easement does not address well, i.e. affirmative obligations for land management, complicates the transaction and adds another layer of perpetual oversight, which will reduce the number of landowners interested in the program and in protecting their property with a conservation easement.
Sonoma Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	Rather than prescribing the content of the management plan, another way to frame the requirements of the plan would be that it must address the landowner's goals in such a way that protects the air, water and soils resources on the property.
Sonoma Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	Funding up to $10,000 towards development of the Plan is helpful but these types of plans can easily cost more, and landowners may not have funds available to pay for this work. In addition, the landowner may not have the funds available to pay the costs up front, with reimbursement coming later. And what if the project doesn't close -will the landowner be reimbursed for the cost?
Sonoma Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans	While we understand the desire to know that conserved properties will be managed to the benefit of air, water and soil, we suggest considering the existence, or near completion, of a management plan as a ranking criterion rather than an eligibility criterion. Another option would be to require a management plan be completed after closing, within an identified timeframe.
California Rangeland Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans Funding	$10,000 for the completion of a management plan helps defray the expense up front and should be offered to those landowners who want to voluntarily develop a management plan.
California Rangeland Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans, need	We would also note that the 2018 Farm Bill removed a similar requirement due the issues raised by the national land trust community.
California Rangeland Trust	Section 2: Agricultural Conservation Acquisition Grants	Management Plans, updates	In addition, management plans increase the cost of completing an easement and require updating every 5 to 10 years as best management practices evolve incurring additional costs.
American Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Match Funding	AFT is concerned about the proposed language (page 8) that makes a fundamental shift in utilizing other Department of Conservation-administered program funding as match toward the purchase price of the property interest. Making a change of this nature may discourage potential applicants that are eligible, and in turn forgo strategic farmland protection projects.
Solano Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Match Funding	Recommend allowing applicants to seek funding from multiple DOC programs. The draft program guidelines propose that SALCP acquisition applicants could no longer apply to other DOC programs for funding for the same project. As you know, dollars are limited for protecting farmland resources in California. Rather than constrain funding sources, we would rather work with DOC to develop transparent and reasonable systems that allow applicants to co-apply for other funding sources, like High Speed Rail mitigation or CA Farmland Conservancy Program funds so that projects can proceed. As DOC staff heard during the Land Trust Listening Your, some parts of the state, notably the Central Valley, have few funding opportunities for easement purchases outside of state programs. Limiting co-application to one DOC program will disproportionately impact under-resourced parts of the state. We urge you to allow applicants to continue to co-apply to more than one DOC program, but we would welcome measures to make that less cumbersome on DOC staff (e.g. a checkbox in the applications to indict other program applications, etc.). (CalCAN letter)

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Solano Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Match Funding	100 percent funding for projects in priority population areas, expand to include socially disadvantaged farmers and ranchers. We support the proposal that DOC continue to offer 100 percent funding for projects in priority population areas but request that those project types include not just projects on prime farmland or farmland of statewide importance, but also farmland of local importance. This is especially important for protecting urban edge properties that may not fall into prime or statewide importance categories but may be designated at farmland of local importance. We also strongly encourage the DOC to provide 100 percent funding for SALCP acquisition projects that benefit socially disadvantaged farmers , which will further the state's goals of addressing equity issues in agriculture. (CalCAN letter)
CALCAN	Section 2: Agricultural Conservation Acquisition Grants	Multiple Funding Programs	Multiple Funding Programs: Recommend allowing applicants to seek funding from multiple DOC programs. The draft program guidelines propose that SALCP acquisition applicants could no longer apply to other DOC programs for funding for the same project. As you know, dollars are limited for protecting farmland resources in California. Rather than constrain funding sources, we would rather work with DOC to develop transparent and reasonable systems that allow applicants to co-apply for other funding sources, like High Speed Rail mitigation or the California Farmland Conservancy Program funds so that projects can proceed. As DOC staff heard during the Land Trust Listening Tour, some parts of the state, notably the Central Valley, have few funding opportunities for easement purchases outside of state programs. Limiting co-application to one DOC program will disproportionately impact under-resourced parts of the state. We urge you to allow applicants to continue to co-apply to more than one DOC program, but we would welcome measures to make that less cumbersome on DOC staff (e.g. a checkbox in the applications to indict other program applications, etc.).
California Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Multiple Funding Programs	The draft guidelines propose the SALC acquisition applicants could no longer apply to other DOC programs for funding for the same project. We highly encourage DOC to allow applicants to continue to co-apply to more than one DOC program. CFT has many interested landowners throughout the Central Valley, but we turn away some because we do not have the match funding sources. We urge DOC to continue its previous practice and allow for land trusts to use the funding tools available for these already hard and complex transactions.
Sierra County	Section 2: Agricultural Conservation Acquisition Grants	Notice to Planning Director	There exists no obligation for any party involved in negotiations (the Department (DOC), the landowner, any involved land trust organization, etc) involving land or easement acquisition to consult with local government during the process
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 acquisitions 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.
Solano Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Planning Grants	Support Proposed Changes for Eligible Applicants and Scoring Criteria. We support the Department's proposed changes to the eligible applicants for the planning grants to include a broader set of land-use stakeholders. We also support the renewed emphasis in the Selection Criteria on planning projects that focus on avoided conversion of farmland and in-fill development.
California Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Priority Population Benefits	Lastly, we thank DOC for its continued commitment to fund 100% of projects in priority population areas. This has enabled CFT to protect valuable farmland in disadvantaged and low-income

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			communities where matching fund abilities are limited to none. We encourage DOC to continue this important feature and to provide clarity in the guidelines in regards to the 100% funding opportunity under the Eligible Costs section. The opportunity is described in the Priority Population Benefits section as "Acquisition applications where 50% or more of the project is located within a priority population area as shown in Appendix C are eligible to receive 100% funding towards the easement value..." The verbiage should be reiterated in the Eligible Costs section.
The Trust for Public Lands	Section 1: Sustainable Agricultural Lands Conservation Program Introduction and Program Summary	Priority Population Benefits	Priority Population Benefits (p.4): We are pleased to see the continued adaptation of AB 1550 into the SALC program. We continue to believe that there should be a reduction in match requirements for properties located within a priority population area.
Santa Clara Open Space Authority	Section 2: Agricultural Conservation Acquisition Grants	Priority Population Benefits	Per prior discussion with Department staff, especially as related to SB 732 (Stern, 2017), farmland of local importance constitutes a critical priority for protection, as identified in the Santa Clara Valley Agricultural Plan. We suggest allowing consideration of farmland of local importance (ideally, also areas with prime farmland soils that are not currently under cultivation) to qualify for funding in addition to prime farmland identified in the Farmland Mapping and Monitoring Program, which only includes actively farmed soils. If there is concern that this could open up funding to questionable local farmland definitions, we suggest also requiring that farmland of local importance needs to consist of prime farmland soils as defined by the USDA. Additionally, based on the reference cited, we believe farmland of Statewide importance and Unique importance are also to be included, but they are not listed. If this is indeed the case, some clarification would be helpful.
California Farmland Trust	Introduction	Program Philosophy	In the first paragraph of the first page of the Guidelines, it states, "A healthy and resilient agricultural sector is becoming increasingly important in meeting the challenges occurring and anticipated as a result of climate change." In order to have a healthy and resilient agricultural sector, agriculture must remain flexible to changes that farmers have already witnessed and those unforeseen because of climate change, environmental regulation, market forces, etc. Creating an agricultural conservation easement program that does not recognize the need for flexibility in agriculture will not allow California to have a healthy and resilient agricultural sector and contribute to a healthy economy and environment for California. CFT encourages DOC and SGC to maintain this essential principle as it makes changes to the SALC Program.
Yolo Land Trust	Introduction	Program Philosophy	The SALC program remains the most important tool for the permanent protection of productive farmland in California. The SALC program must continually recognize the need for flexibility within agriculture in order to meet the effects of climate change. Imposing additional restrictions on agricultural practices will reduce the number of growers who are willing to permanently conserve their lands.
American Farmland Trust	Section 3: Planning Grants	Program Support	AFT continues to support DOC's inclusion of the SALC Planning Grants (Planning Grants) which focus on critical drivers that support agricultural land protection, the viability and growth of the agricultural economy, and resilient regional food systems and infrastructure. Planning Grants represent a critical tool for local responsible land use entities to create visions that are actionable and implementable to support a comprehensive, community supported plan. AFT believes that the continuation of funding for local planning is necessary to allow space for creative and much needed innovation to support successful farmland protection in California.
The Trust for Public Lands	Section 2: Agricultural Conservation Acquisition Grants	Property Valuation	Thank you for continuing to allow appraisals to be submitted prior to close of escrow.
The Trust for Public Lands	Section 2: Agricultural Conservation Acquisition Grants	Public Health Co-Benefits	We suggest adding clean water as an example of a public health cobenefit.

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The Trust for Public Lands	Section 2: Agricultural Conservation Acquisition Grants	Readiness	When must match be secured for the purposes of this program? In past iterations, it was nine months from Council approval. Is this still the standard or does it just go to competitiveness?
The Trust for Public Lands	Section 2: Agricultural Conservation Acquisition Grants	Restrictions on Ag use	Furthermore, we appreciate the clear overview of where restrictions on agricultural properties will be permitted- where the "restriction is consistent with the property's continuing agricultural use; and agricultural use of the property is not substantially prevented."
Sierra County	Section 2: Agricultural Conservation Acquisition Grants	Restrictions on Ag use	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, acquisitions 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.
The Trust for Public Lands	Appendix A	Risk Option, additional option	Furthermore, we'd like to see to see a criteria that provides opportunities to argue for added consideration of conversion risks beyond risk options again.
CALCAN	Appendix A	Risk Options	Support dropping Risk Options 8, 9 and 10 for acquisition projects. We recognize the importance of SALCP projects supporting in-fill development and reduced vehicle miles traveled associated with sprawl and rural ranchette development. We support the Department's efforts to focus the program on projects that best achieve those goals by eliminating risk options 8, 9 and 10. We believe with this change the program will be able to continue its impactful work of protecting agricultural lands at risk of urban sprawl and rural ranchette subdivision.
California Rangeland Trust	Appendix A	Risk Options, current zoning minimums	We also would like Risk Options 8-10 restored because they can be fall back options for otherwise important properties that do not fit in other categories. We understand and support the focus on easement projects that encourage infill development and properties that rely on these categories will probably not receive competitive scoring. Nonetheless, there may be situations where these risk options are applicable and the easement also meets infill criteria.
The Trust for Public Lands	Appendix A	Risk Options, current zoning minimums	We suggest adding "Risk of subdivision to current zoning minimums: to demonstrate risk of conversion for which the current level of agricultural zoning can be used to calculate the number of extinguished development rights" back into the guidelines.
MALT	Appendix A	Risk Options, current zoning minimums	We recognize that there is a legislative mandate to focus SALC program funding on projects that support in-fill development and reduce vehicle miles traveled associated with urban sprawl. However, the rangeland projects funded by SALC have protected thousands of acres of California's grasslands that sequester carbon and mitigate the effects of climate change. Because the risk options have included the risk of rural ranchette development with long drive times, rangeland projects often reduce significant vehicle miles traveled. California's rangelands are also home to a diversity of wildlife and plants, allowing the SALC program to fund multi-benefit projects with matching funds from habitat and natural resource funders. SALC's inclusiveness has engaged a new constituency of land trusts and public agencies in agricultural land conservation and has been core to its success. The SALC program has achieved an extraordinary range of agricultural conservation, and we urge you to maintain the risk options, eligibility requirements and selection criteria that has made this possible. In the alternative, if State policy mandates the focused expenditure of SALC funds on the urban edge, we recommend that DOC work with the legislature and other agencies to ensure that there is adequate funding to protect California's rangelands.
Sierra Foothill Conservancy	Appendix A	Risk Options, current zoning minimums	Risk Options on page A-1. Removal of Risk Option #9 "Agricultural land located within two miles of attraction(s) such as a casino, resort, golf course, public recreation area, school or university; within

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			two miles of a major highway intersection; or within two miles of a planned road expansion project that increases vehicle capacity (e.g. additional lanes)" would also pose an issue for the rural lands SFC protects. A significant portion of our lands are located adjacent or in close proximity to reservoirs and public recreation areas, which have suffered from shoreline development and fragmentation. We understand that SALC is increasing programmatic focus, and that this particular Risk Option may not explicitly align with promoting urban infill development. However, omission of this Risk Option would again, pose a threat to obtaining funding for lands within our four-county service area that lack typical urban spheres of influence and incorporated cities.
Solano Land Trust	Appendix A	Risk Options, current zoning minimums	Granted the options are not used frequently or may not provide the focus on easement projects that encourage infill development and properties that rely on these categories will probably not receive competitive scoring. Nonetheless, there may be situations where these risk options are applicable and the easement also meets infill criteria
Solano Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Scope of Changes	Solano Land Trust applied and was awarded in Rounds 3 and 5 and we do have landowners geared up for Round 6. This Round's Guidelines have created and for asked yet another change in the guidelines, as did 5 and 4 and 3 and 2 and 1. There was a comment on the phone call last week that said "it is not broke, so don't fix it". Granted there are requests for changes, actions that bolster the mission and connectivity of programs and folks are looking to get what they need from all sides, at times this may be at the detriment to the outcome we are all seeking. The SALC program has preserved 112,500 in 5 years. It that not something the SCG is happy with? Are the changes asked for from their end in reaction to that number? There are so many variables to a successful placement of an easement. The landowner ultimately makes the choice to be a willing seller based on the market, the relationship the land trust builds the restrictions place the flexibility of the easement, the length of time to complete the possible oversight. The constant updates and changes placed in front of the conservation agency and landowner, can really set strong viable projects back and the relationships off track that have been built.
CALCAN	Section 3: Planning Grants	Selection Criteria	We also support the renewed emphasis in the Selection Criteria on planning projects that focus on avoided conversion of farmland and in-fill development.
California Farm Bureau Federation	Section 2: Agricultural Conservation Acquisition Grants	Selection Criteria	Over the last three rounds of solicitations, there has been a concerning trend of devaluing the points available for the Agricultural Use selection criteria under the Agricultural Conservation Easement (ACE) component of the SALC Program. For example, in the 2017-18 guidelines, a project's Agricultural Use, if scored perfectly, was valued at 35 points; this point value was reduced to 30 in 2018-19 and is currently at 25 points in the draft guidelines. These 25 Agricultural Use points constitute less than 20% of the total points possible for a project. Conversely, in the same three-year timeframe, the points afforded to and types of co-benefits eligible under the Program has grown exponentially. Historically, co-benefits were confined to a single section, as they were complimentary to the underlying goals of the Program. Currently, however, co-benefits are offered four distinct scoring sections, collectively valued at 40 points. This means that a project can have limited to no agricultural significance but achieve maximum co-benefit points and be funded over an agriculturally significant project. To put this in realistic terms, a proposal that scores high in the agricultural use criteria—a small farm that uses healthy soils practices and irrigation efficiencies that is at serious risk of conversion—may not be funded because it does not score high in the co-benefit categories—it's not in a county that has a wildlife conservation program, isn't at risk of wildfire, and doesn't support a farm incubator. In consideration of the points allocated, it is helpful to reflect on SALC's governing objectives—avoid increases to greenhouse gas emissions and protect agricultural lands. Certainly, Farm Bureau agrees

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			that agricultural land conservation is an important goal in it of itself and has the potential to provide a myriad of co-benefits, for which credit is due. However, when the co-benefits become the de facto objectives of the Program, SALC is no longer an agricultural land protection Program. Farm Bureau proposes that either additional points be awarded to the Agricultural Use components of the Selection Criteria or less be afforded to the various co-benefit sections to re-balance the Program towards its ultimate agricultural protection goal.
California Farm Bureau Federation	Section 2: Agricultural Conservation Acquisition Grants	Selection Criteria	Along with the proliferation of co-benefit subsections (Environmental, Economic and Fiscal, Public Health and Other), Farm Bureau would like to express its concerns about the undefined terms used to describe potential co-benefits and their appropriateness for inclusion in this Program.
Yolo Land Trust	Section 2: Agricultural Conservation Acquisition Grants	Selection Criteria	Points allocated for long-term commercial agricultural production and water availability should be increased. These factors will determine whether the land remains in production rather than its location.
California Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Selection Criteria, Agricultural Use	The property is likely to support long-term commercial agricultural production /20 points
California Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Selection Criteria, Agricultural Use	The property incorporates or is in the process of incorporating on-farm land management practices that improve water use efficiency, conservation, and reduction; increase use of recycled water; support groundwater recharge; or reduce reliance on groundwater 15 points
California Farm Bureau Federation	Section 2: Agricultural Conservation Acquisition Grants	Selection Criteria, Economic and Fiscal Co-Benefits	Economic and Fiscal Co-Benefits: Under this header, a potential co-benefit includes a project that supports "food production for local or regional markets." Farm Bureau would ask what may qualify for this additional 5-points? Is the intention that the additional points only be eligible for those that farmers who sell to a local farmers' market or retailer? Often, farmers forward contract through wholesalers or distributors, who then dictate the end recipient of the commodity. While the commodity may reach local or regional markets, the farmer may not have the ability to identify or direct that distribution. This is a reality in which farmers who don't sell into a niche market may not be eligible for these important, competitive points without further detail.
California Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Selection Criteria, Environmental Co Benefits	This section should be deleted as it has no bearing in protecting agricultural land.
California Farm Bureau Federation	Section 2: Agricultural Conservation Acquisition Grants	Selection Criteria, Generally	Without further clarity on these items and an evaluation of their appropriateness within this Program, grant proposals may not be scored based on their ability to meet the objectives of the SALC Program, but rather on how creatively an applicant may appeal to the complimentary co-benefits allotted. This undermines the Program on its face. Farm Bureau would request the Department re-evaluate the existing co-benefits, streamline them into a single Co-Benefit section and identify distinct practices that are eligible tied to verifications and reporting.
California Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Selection Criteria, Generally	We suggest edits (shown in red) to the Selection Criteria and available points for each criteria area for a total point received to be 140. Agricultural Use should account for a minimum of 50 points.
California Farm Bureau Federation	Section 2: Agricultural Conservation Acquisition Grants	Selection Criteria, Other Co-benefits	Within this broad title, a property may support a "farm incubator or new farmer training program" to be eligible for additional points. This section requires further detail—many of our farms and ranches depend upon succession planning to transition property to intergenerational family members. The agricultural industry is experiencing significant leakage with children of second, third, fourth generation farming families leaving for non-agriculturally related careers. Under this proposed co-benefit criteria, would keeping next generation family members on farm constitute a farmer training program or would offering acreage to a family member for test plots serve as an incubator?
California Farmland Trust	Section 2: Agricultural Conservation Acquisition Grants	Selection Criteria, Other Co-benefits	Author suggests striking items
POST	Section 2: Agricultural Conservation Acquisition Grants	Selection Criteria, proximity to population centers	Another aspect within the selection criteria that we find problematic is giving additional points to properties that already incorporate conservation management practices. Greater greenhouse gas

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			reduction benefits are likely to be accrued when properties that are not already implementing these practices are acquired in fee by resource conservation entities, or when a landowner is considering a conservation easement and starting a long-term partnership with such an entity.
California Farm Bureau Federation	Section 2: Agricultural Conservation Acquisition Grants	Selection Criteria, Public Health Co-Benefits	Public Health Co-Benefits: One potential co-benefit eligible for additional funds under this title includes "reduction or elimination of pesticide use." Not only does this represent mission creep by the Department, it also has no relation to the underlying objectives of the Program. Moreover, reduction or elimination of pesticide use on-farm does not necessarily translate to public health benefits. In some instances, failure to use appropriate pesticides, which are also authorized under an Integrated Pest Management approach and organic production, will allow the proliferation of a pest or weed infestation, resulting in negative public health impacts. In just one such example, failure to manage lands for yellow star-thistle using targeted and immediate chemical approaches, results in tremendous water loss, displaces native plants which serves as important foraging opportunities for pollinators, and may poison grazing horses on pasture, infecting them with "chewing disease."
POST	Section 2: Agricultural Conservation Acquisition Grants	Selection Criteria, Risk of Conversion/Greenhouse Gases Avoided	POST is also concerned with the high level of points given to projects, "located within 2 miles of a city sphere of influence for a city with a population greater than 5,000…" as it undervalues agricultural land conservation surrounding rural communities that can result in a greater avoidance of vehicle miles traveled. For example, our coastline (San Mateo and Santa Cruz Counties), has several small towns whose populations are well under 5,000, but the threat of agricultural land being converted is still very high. We appreciate the desire to build a buffer of protected agricultural land around cities, but we are concerned about the agricultural land that is 3, 10, or even 20 miles out — distances that many Californian's are already commuting from today. We suggest expanding the 2 mile limitation to 20 miles or farther, or at minimum, decreasing the point value given to this element of the selection criteria.
Sierra Foothill Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Selection Criteria, Risk of Conversion/Greenhouse Gases Avoided	Per the "Selection Criteria" section on page 10 – regarding the second selection criteria under "Risk of Conversion/Greenhouse Gases Avoided". The selection criteria, "The property is 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", is seemingly weighted heavily (in comparison to other listed selection criteria) and would disadvantage rural areas. This is problematic for the lands SFC conserves, for they are largely rural in nature. However, rural landscapes and smaller populations are not necessarily indicative of fragmentation, which as we know, is the leading cause of rangeland conversion. SFC suggests reducing the weight (maximum points) of this selection criteria and increasing the proximity to city spheres from 2 miles to 5 miles.
The Nature Conservancy	Section 2: Agricultural Conservation Acquisition Grants	Selection Criteria, Risk of Conversion/Greenhouse Gases Avoided	The selection criteria on page 10 under "risk of conversion" gives high points for properties located within 2 miles of a sphere of influence of a City with a population greater than 5,000 people. In general, this makes sense but it fails to consider agricultural areas that may be under a greater threat of conversion but do not meet these criteria. Sites that are located near very large and expanding urban areas but are more than 2 miles from a city sphere of influence are often converted from farmland to higher uses. A 2-mile separation from any of the states' largest cities would not be considered a hindrance to a developer. An extreme example is the large Centennial development approved by Los Angeles County. That project will convert over 12,000 acres of farm and rangeland to more than 19,000 homes and 10.1M square feet of commercial space. Yet the project is located about 60 miles north of Los Angeles. Another example is Ventura County that is adjacent to and includes part of the developed Los Angeles metro area. Ventura County has 100,000 acres of farmland and is consistently ranked as the 10th or 11th most productive agricultural county in the United States. A development in many areas

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			of the county could be more than 2 miles from a city yet it would have easy access to Los Angeles job centers via large existing freeways including Highway 101 and Interstate 5. Therefore, much of the county's farmland would score low in the Guidelines. This issue would also be true for other counties adjacent to Los Angeles and probably those near the S.F. bay area, San Diego and Sacramento metro areas. The guidelines could address this by increasing the qualifying distance for larger metro areas to at least 10 miles. I have suggested revised language below. The property is 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. Or The property is located within 10 miles of a city sphere of influence for a city located within a metropolitan area with a population of more than 1,000,000, or within 10 miles of a census designated place (CDP) located within a metropolitan area with a population of more than 1,000,000. Thank you for the opportunity to comment on this important topic.
Santa Clara Open Space Authority	Appendix B and C	Subdivision Prohibition	There is a question in the pre-proposal and in the application of whether the proposed acquisition will prohibit further subdivision of existing legal arcels or the separate sale of legal parcels. The easement template on the Department's website includes a prohibition against subdivision, and we would assume that there would be a similar prohibition against subdivision for fee acquisition in the deed restriction. We therefore are simply asking why the question in the pre-proposal and application exists, as it could lead to some confusion as to whether subdivision may be allowed.
Santa Clara Open Space Authority	Section 2: Agricultural Conservation Acquisition Grants	Subdivision Prohibition	There is a question in the pre-proposal and in the application of whether the proposed acquisition will prohibit further subdivision of existing legal parcels or the separate sale of legal parcels. The easement template on the Department's website includes a prohibition against subdivision, and we would assume that there would be a similar prohibition against subdivision for fee acquisition in the deed restriction. We therefore are simply asking why the question in the pre-proposal and application exists, as it could lead to some confusion as to whether subdivision may be allowed.
Sierra County	Section 2: Agricultural Conservation Acquisition Grants	Time for Pulic Comment	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.
California Farm Bureau Federation	Section 2: Agricultural Conservation Acquisition Grants	Water Availability	Recent studies and publications have forecasted the alarming impacts of the full implementation of the Sustainable Groundwater Management Act (SGMA) on water availability for California's agricultural lands. These studies project that to achieve long-term sustainability, the State should expect to see the idling of over half of a million acres of productive agricultural lands, specifically in the Central Valley. (*Editors note-footnote ommitted*.) Given the existing number of medium to high-priority groundwater basins subject to SGMA, we can expect to see similar impacts statewide. Under the draft guidelines, the Department proposes to shift agricultural constraints, including water availability, from a selection criterion to an eligibility criterion. With this change, the impacts of SGMA on water availability may make broad swaths of agriculturally rich areas currently ineligible for grants or out of compliance in the future. Hydrology changes year over year but agricultural soils are a geologic asset that we cannot afford to lose and SGMA's impacts may not forever impede agricultural production. Farmers most impacted by SGMA may be able to transition to new alternatives to maintain productivity, including local water trading systems, identifying new supplies, dryland farming, crop transitions or deploying agricultural and irrigation technologies and

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			efficiencies. Farm Bureau requests that the Department allow an evaluation of water availability based upon a time horizon equivalent to or exceeding the implementation of SGMA. (*Editors Note-footnote omitted.*)
CALCAN	Section 2: Agricultural Conservation Acquisition Grants	Match Funding	Match Requirements: 100 percent funding for projects in priority population areas, expand to include socially disadvantaged farmers and ranchers. We support the proposal that DOC continue to offer 100 percent funding for projects in priority population areas but request that those project types also include farmland of local importance. This is especially important for protecting urban edge properties that may not fall into prime or statewide importance categories but may be designated at farmland of local importance. Furthermore, we strongly encourage the DOC to provide 100 percent funding for SALCP acquisition projects that benefit socially disadvantaged farmers1, which will further the state's goals of addressing equity issues in agriculture.
California Farm Bureau Federation		General Comment	In summation, Farm Bureau is cognizant that California is on a potentially cataclysmic path—pitting the need for affordable housing against the need to protect productive agricultural lands. With the impacts of SGMA on the horizon, encouraging planned development that avoids sprawl and protects our agricultural lands is of pivotal importance. In that pursuit, we encourage the Department to utilize Farm Bureau's 53 county Farm Bureaus as outreach venues to educate our farmer and rancher members about the SALC Program and other initiatives within the Department's purview that can mitigate these impacts. Thank you for the opportunity to share our perspective. If you have questions or comments, please feel free to reach out to me directly at troschen@cfbf.com or (916) 446-4647.