

**Round 8 Sustainable Agricultural Land Conservation Program Guidelines
Public Comments Log**

Comment Number	Commentor	Section	Topic	Comment
1	NCRLT	Capacity Grants	Funding	We were delighted to see the suggestion from the prior listening session about creating funding tiers incorporated. <i>Thank you!</i> As a follow-up to that suggestion, if there is a way to implement this, it might be very helpful to create a training/peer-learning cohort for Tier 1 grantees, where they are required to participate in a short series of training workshops from DOC staff on common challenges for new grantees. A structured onboarding series could help new grantees to build up their internal systems faster and with less trial-and-error so they can make best use of the grant funds. Within this workshop series, it could also be very helpful to provide opportunities for new grantees to learn from prior grantees about what tools/structures they used to build internal capacity to implement the grant. We would have found something like this very helpful when we were getting started.
2	NCRLT	Capacity Grants	Funding Requirements	While all of the items listed in the 5 bullet points would be very important, in our experience, it's possible to have all of these bases covered and yet still face significant needs for internal capacity-building and infrastructure investment in order to implement the grant activities effectively. There are several hurdles missing from this list that our organization had to clear in order to upscale the pace and impact of our work under the WLRCP capacity grant. Some of these might be important criteria to consider when evaluating the readiness of other small organizations and/or to invest in when developing the capacity of small organizations: <ul style="list-style-type: none"> - Having or adopting a staff time-keeping system with the capacity to generate reports that break time down by grant task and by person - Having financial (or other) staff sufficiently skilled to develop (and use) an Excel template in the format of the DOC-provided invoice with formulas that allow for efficient and accurate invoice submission - Recruiting, onboarding, and training new staff or investing in professional development of existing staff to build up a team that can meet the needs for increased pace and scale of conservation project development under the grant - Developing and/or formalizing outreach and education materials to improve the efficiency and consistency of contacts with prospective ACE landowners during project development
3	NCRLT	Capacity Grants	Grant Term	We were very happy to see the change to a 3-year term; <i>thank you</i> for implementing this feedback from the listening session!
4	NCRLT	Capacity Grants	Eligible Applicants	Under WLRCP, [the eligible applicant] list was limited to land trusts and nonprofit organizations. We understand that it needs to expand to all of the applicants eligible for other SALC funding, but from the land trust perspective, we do have some concerns about this shift. Cities, counties and park/open space districts are eligible for many state funding opportunities that land trusts, RCDs, and even tribes are excluded from. That's part of what made the WLRCP Capacity Grant so transformational; it was a rare opportunity for land trusts to secure funds that supported us in advancing our mission and it dramatically accelerated development of new projects. We're concerned that the increased competition under this new solicitation could result in land trusts being pushed out of the running by larger entities with larger staff teams that can propose flashier projects and tap into many other funding sources (including possible tax-base support) for matching dollars. It seems like they will have a definite advantage. To be clear, we're very grateful that the Capacity Grant program is being revived under SALCP and that land trusts will still be eligible applicants. We would simply like to express that if an opportunity ever presents itself for the WLRCP Capacity Grant to be re-funded and made available to a more limited pool of applicants that have traditionally been excluded from many other funding opportunities, we would appreciate you considering that. I think it's safe to say that was a very valued program by the land trust community!
5	NCRLT	Capacity Grants	Eligible Activities	Due to the shift to funding capacity grants under SALCP, it makes sense that the focus is squarely on agricultural land protection now. As a general comment, we see a need for a program that follows the capacity grant model to support project development for riparian/watershed and habitat/open space protection as well. These lands are critical to ecosystem service provision, including carbon sequestration, as well as progress toward global biodiversity protection targets and plans to avert catastrophic climate change. We're not seeing any funding on the horizon that targets development of projects on these kinds of lands, and yet in many cases we encounter, these landowners are the least able to self-fund a land trust to develop a conservation easement on their property because they have no income from the land. These landscapes are unquestionably under pressure from urban growth and housing development across the state, just as agricultural land is. Land trusts are well-positioned protect watersheds and other open spaces that can serve as crucial wildlife migration and species adaptation corridors through increasingly fragmented landscapes. We would be thrilled to see a future capacity grant designed to catalyze this kind of work with multiple landowners and/or multiple partner entities. There is a clear need to protect these contiguous open spaces while we still have the opportunity to do so.
6	NCRLT	Capacity Grants	Eligible Costs	We were delighted to see the revision to the indirect cost cap (now 20%) that better reflects the real overhead costs faced by many small organizations. <i>Thank you!</i>

7	NCRLT	Capacity Grants	Selection Criteria	<p>We strongly support considerations of equity in the funding process. We work in a region of the state with many low-income and disadvantaged communities, and recognize the need for targeted support to address unique challenges these producers face. However, we are concerned about the proposed changes to the Selection Criteria in comparison to the prior WLRCP Capacity Grant and the SALCP Acquisition Grants. Giving 30% of the project score to Equity considerations at the SALCP Capacity Grant level though it comprises only 15% of the project score at the SALCP Acquisition Grant level will likely mean that many projects in the pipeline for land trusts which would be highly competitive for SALCP acquisition grants could fail to win this development funding and will not come to fruition. In our region, many of the large-scale agricultural land-holdings that are prime conservation targets for green-lining communities, protecting sequestered carbon, promoting compact urban development and infill, supporting local food security, and maintaining a permeable landscape for wildlife movement are owned by experienced, non-Veteran, non-Native American farmers and ranchers. These lands may or may not fall within low-income or disadvantaged census tracts, even though they benefit nearby communities that do fall in these guidelines. Yet these lands provide critical opportunities for meeting the state’s climate goals at scale, and for many of the landowners we prioritize working with, these are also proving grounds for other innovations like regenerative agricultural practices, traditional dryland farming, etc. Under the new SALCP Capacity Grant guidelines, it’s possible these easement projects wouldn’t even make it off the starting block if they’re losing 30% of the possible points for development funding immediately. This heavy weighting seems out of proportion to the weighting given in the prior WLRCP Capacity Grant (10%) and in the SALCP Acquisition Grant (15%). We would respectfully suggest that there should be additional weight given to projects that are high-impact in other areas, such as supporting viable agricultural production, meeting other program goals like biodiversity protection, or providing significant co-benefits, and that these additional criteria should also be reflected in the selection matrix. Equity is crucially important, but we’re concerned that under this weighting structure it may effectively sideline otherwise outstanding, high-impact conservation prospects that the state desperately needs to achieve climate targets right now.</p>
8	LTSCC	Acquisitions	Fee Acquisition Conditions of Funding	<p>The text on page 34 of the draft guidelines reads: <i>“The title to the property will be encumbered in perpetuity with the following covenants that run with the land:...</i></p> <ul style="list-style-type: none"> • <i>All net proceeds from the lease revenue will be reinvested only in improvements on the purchased property or in pursuit of agricultural conservation easements in the region...</i> <p>The Land Trust proposes two alternatives for the bulleted statement: Our preferred solution is to edit the language to say:</p> <ul style="list-style-type: none"> • <i>All A portion of net proceeds from the lease revenue equal to the portion of SALC funds used to purchase the property will be reinvested only in improvements on the purchased property or in pursuit of agricultural conservation easements in the region...</i> <p>These changes would facilitate access to other sources of matching funds, such as loans, private philanthropy, and other grants, which may have different requirements on how revenues are used. If the SALC program contributes a fraction of the overall purchase price, it is appropriate that only the same fraction of income should be encumbered by the SALC grant restriction.</p> <p>If that change is not possible, we recommend this language instead:</p> <ul style="list-style-type: none"> • <i>All net proceeds from the lease revenue will be reinvested only in improvements on the purchased property or in pursuit of agricultural conservation easements in the region...</i> <p>While easements are the preferred approach to agricultural conservation in most circumstances, they are not always applicable.</p>
9	CFT	General	General Support	<p>CFT has long supported the Department of Conservation (DOC) and Strategic Growth Council’s (SGC) goals in implementing SALC as an important climate and land conservation program for California. CFT is especially pleased to see the direction of DOC and SGC in streamlining the Guidelines with the key focus remaining to protect agricultural lands to reduce greenhouse gas emissions by improving infill development.</p>
10	CFT	General	General Support	<p>CFT is pleased with the outcome of the Selection Criteria and taking a portfolio approach to protecting agricultural lands at risk of development. CFT especially appreciates seeing the percent of the total ranking score increased for the Agricultural Use criteria again with a key focus on soil quality and water availability and quality.</p>

11	CFT	Acquisitions	Infill and Risk of Conversion	The redefined Infill Development/Conversion Pressure criteria certainly broadens ways to highlight how a project supports infill and compact development, however CFT is concerned and suggests providing additional guidance to applicants, especially those new to the program, on how they can best describe the sprawl or rural ranchette development pressures on project applications. Perhaps providing resources and additional examples to applicants for considering commute distances, changes in housing development, housing growth pressures and prices and linear distances would be beneficial. This will help to ensure a strong program focus on protecting at-risk agricultural lands and not deter future applicants.
12	CFT	Capacity Grants	General	As California continues to lose an average of 50,000-acres of agricultural land per year, CFT welcomes the addition of capacity grants. Such funding is limited in the land trust community and can increase CFT and other land trusts impact to protect valuable farmland.
13	CFT	Acquisitions	Match Funding	CFT is grateful for the resources that SALC provides for easement acquisitions, but remains concerned that awarding only 75% of the value of the easement limits the reach and impact of SALC. Although CFT is able to leverage funding against SALC in certain areas of the state, not all areas are so fortunate. These areas where match funds are sparser, tend to be Priority Populations that would greatly benefit from farmland protection. In Round 5, SALC provided for 100% funding without needing to complete the Priority Population Benefits Checklist which enabled CFT to protect valuable farmland in a disadvantaged and low-income community where matching fund abilities were limited to none. Through this opportunity in Round 5, 327-acres were forever protected on a multigenerational diversified farm that directly provides over two hundred jobs to the local community with continuing education and leadership training for employees and school supplies for the employee's children. In addition, the farm provides food access through annual donations to food banks. We encourage DOC to continue this important feature and to provide clarity in the guidelines for 100% funding eligibility without the requirement to complete the Priority Population Benefits Checklist.
14	CFT	Acquisitions	Associated Costs	In addition, the \$50,000 provided for associated costs remains helpful, however CFT is concerned about inflation and rising costs over the next year as consultant and contractor fees continue to increase. For certain projects, especially projects with larger acreage where appraisal costs tend to be more, CFT foresees associated costs surpassing the current limit over the next year and encourages DOC to consider increasing the value by at least \$5,000.
15	CFT	Acquisitions	Stewardship Costs	CFT also urges DOC to provide funding to establish a permanent stewardship and defense fund for each easement which is necessary for CFT to maintain easements overtime. DOC has taken steps in this direction in other contexts, such as including monitoring and management in the fundable deliverables for the new Multibenefit Land Repurposing Program and previously in the Agricultural Land Mitigation Program. Providing for the long-term costs of holding conservation easements could broaden the reach and impact of SALC, particularly in underserved regions of the state such as the San Joaquin Valley.
16	CFT	Acquisitions	Groundwater Sustainability	As expressed in CFT's SALC Round 7 Guideline comments, a concern remains around the new Groundwater Sustainability Agency (GSA) requirements. While the requirement to analyze Groundwater Sustainability Plans (GSPs) for consistency with a project as a component of the Guidelines was removed, the requirement was replaced with seeking approval of an easement project through the GSA. Many GSA's do not have a full-time staff person that is readily available to draft such approval letters or potentially not even aware of the SALC program. At this stage, rather than seeking the GSA's approval, which could delay or stop a qualified project's ability to submit a final application, CFT suggests to drop this overburdensome requirement and proposes that only written notification to the GSA be required until GSAs are more established in the state and have developed and begun implementing GSPs.
17	CFT	Acquisitions	Application Timeline	In addition, CFT echo's previous comments shared in regards to the timeline of the final Guideline release in relation to the pre-proposal application due dates. Leaving applicants only a month to prepare extensive pre-proposals that are essentially full applications, is becoming more and more challenging as the timeline seems to be shortening from cycle to cycle each year. CFT would appreciate seeing at least a two-month time period from the final Guideline release to the pre-proposal due date as many of the requirements, such as ordering and reviewing title reports, preparing maps, researching general plans and sustainable community strategies, etc., takes much longer than one month.

				<p>On page 14 of the draft guidelines, it states: <i>The easement holder/conservation buyer must have the conservation of agriculture, rangeland, or farmland among their stated purposes, as is prescribed by statute, or as expressed in the entity's adopted policies.</i></p> <p>Our members include public agencies, park districts, and other organizations who use a variety of practices to manage the habitat under our care. Some of our preserves are explicitly closed to the public; others allow for passive recreation such as hiking and horseback riding; while others integrate species conservation alongside agricultural practices. In other words, while agricultural conservation may be an aspect of our work, it is generally not the primary focus of our work, which is habitat conservation to support threatened and endangered species. This does not mean, however, that we are indifferent towards agricultural conservation, and in fact, in certain circumstances, we find that the habitat for the species we aim to protect can coexist harmoniously with agriculture, whether that be rangelands or croplands.</p>
18	CHCPC	Acquisitions	Applicant Eligibility	<p>The requirement for an easement holder or buyer to have the conservation of agriculture as a stated purpose of the organization leaves out a number of organizations that have harmonious conservation missions, even if they do not explicitly list agricultural conservation among them. We believe this limitation does not increase the on-the-ground impacts of these funds, but rather excludes otherwise capable and like-minded organizations from accessing critical public funding for conservation.</p> <p>We believe a better path forward is not to require an applicant to the SALC Program to have a stated purpose of agricultural conservation, but rather for the applicant to explain in their application how the individual project will contribute to the Program's goals of conserving agricultural land and how that project fits within the organization's larger conservation strategy.</p> <p>We believe that with this small change, the NCCPs and HCPs can be a critical partner to the Department of Conservation in meeting its goals of preserving agricultural lands while reducing sprawl, which will benefit both GHG reductions and biodiversity through habitat preservation.</p>
19	CalCAN	General	General Support	<p>We support the direction of the Department of Conservation and the Strategic Growth Council in streamlining the selection criteria for the acquisition grants and taking a portfolio approach to protecting agricultural lands at risk of development. We were also pleased to see the capacity grants added to the program. Such funding is limited in the land trust community and can help improve our impact. We also support the expansion of the SALCP planning grants to \$500,000 because good farmland conservation planning efforts require extensive, but not inexpensive community engagement.</p>
20	CalCAN	Acquisitions	Infill and Risk of Conversion	<p>Provide guidance to new acquisition grant applicants on how to describe development risks Recommendation: As we stated above, we support the streamlined direction of the acquisition selection criteria but we also suggest providing more guidance to applicants, especially those new to the program, on how they can best describe the sprawl or rural ranchette development pressures on their proposed acquisition projects. This will help to ensure a strong program focus on protecting at-risk agricultural lands.</p>
21	CalCAN	Acquisitions	Equity	<p>Add "Buy, Protect, Sell/Lease" option to the acquisition projects program to support land access and tenure for beginning, veteran, and socially disadvantaged farmers and ranchers. Recommendation: DOC held workshops last year on how the department could improve equity within its programs, including improved land access and tenure. We strongly encourage DOC to allow for "Buy, Protect, Sell/Lease¹" acquisition projects in the new SALCP guidelines. Such projects can should require that the land be sold or leased to beginning, veteran, and socially disadvantaged farmers and ranchers.² The inclusion of this project type can advance land access, tenure, and equity in California by reaching farmers who are otherwise unable to secure agricultural leases or acquisitions because of rising land values.</p>
22	CalCAN	Acquisitions	Tribal Engagement	<p>We support \$500,000 for DOC to develop a process with Tribes to determine where traditional Tribal lands are located for the purpose of offering Tribes the first right of refusal to purchase the land and develop collaborative management processes for land management consistent with Tribal goals and access rights. Recommendation: This effort builds upon the work of the state to improve relationships with the Tribal governments and organizations in California.³ The funding would allow DOC to set up a process, in consultation with Tribal governments and organizations, for how the state might engage Tribes in land conservation activities that include collaborative management processes and the first right of refusal.</p>

23	CalCAN	Acquisitions	Match Funding Stewardship Costs	<p>We support more comprehensive funding for conservation easements, including funding for stewardship and defense endowments necessary to maintain easements over time.</p> <p>Recommendation: We are grateful for the resources that SALCP provides for easement acquisitions, but we remain concerned that awarding only 75% of the value of the easement, and specifically ruling out funding for stewardship and legal defense costs, limits the reach and impact of the program. We would strongly urge DOC to increase the proportion of funding for easement acquisitions to 100%, and to provide funding to establish a permanent stewardship and defense endowment for each easement.⁴ DOC has taken steps in this direction in other contexts, such as including monitoring and management in the fundable deliverables for the new Multibenefit Land Repurposing Program.⁵ Providing for the long-term costs of holding conservation easements could broaden the reach and impact of SALCP as well, particularly in underserved regions of the state such as the San Joaquin Valley.</p>
24	Shayne Green	General	General Support	<p>I appreciate the hard work Department of Conservation (DOC) staff has put into developing the Round 8 SALCP Guidelines over the last year, including the solicitation and incorporation of stakeholder input. The result is a set of Guidelines that seems more consistent with statutory mandates; more accessible to a range of possible participants; more reflective of the state's diverse needs/priorities; and more practical to implement. Importantly, these Guidelines appear to reflect an openness to considering the unique ways that projects across the state, and those in low-income rural communities in particular, meet the underlying statutory mandates of the SALC Program and meaningfully advance its goals. I extend my sincere compliments to DOC staff and the SGC for their diligent work, openness to stakeholder input, and commitment to continuous improvement in the SALC Program.</p>
25	Shayne Green	Acquisitions	Infill and Risk of Conversion	<p>I do want to point out a critical point of ambiguity in the Draft Guidelines, which provide no clarity on the kinds of acquisition projects that are eligible for funding under the "supports infill and compact development" criterion. The treatment of "supports infill development" has changed a lot over the last few grant cycles, creating uncertainty around the intention in Round 8. The disconnect between the rollout of these pivotal details and the public's ability to comment on them well in advance of the SGC's decision to adopt the Guidelines is seemingly problematic. If the SALCP has shifted to a much more inclusive definition of eligibility under the "infill" criterion as many think is warranted, then my concern on this issue is greatly alleviated. I cannot tell from the Guidelines what exactly is the case here.</p>
26	Shayne Green	Acquisitions	Infill and Risk of Conversion	<p>PRC 75210 directs the SGC to develop and administer the AHSC program through projects that reflect various policy objectives, including "(h) Protecting agricultural lands to support infill development." PRC 75210 states that "Projects eligible for funding pursuant to the program include any of the following:</p> <p>....</p> <p>(h) Acquisition of easements or 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 or suburban sprawl or those of special environmental significance."</p> <p>The statute seems to provide wide sideboards on what "supports infill development" and is eligible for funding.</p>
27	Shayne Green	Acquisitions	Infill and Risk of Conversion	<p>During public input opportunities over the last couple of years, and in keeping with both statutory language and the principle of inclusivity, numerous stakeholders have asked the SALCP be more flexible in its determinations of eligibility under the "infill" criterion. The "within five miles of a residential area" criterion employed during Round 7 strikes many as unreasonable and poorly supported by actual subdivision and development patterns across the state.</p>
28	Shayne Green	Acquisitions	Infill and Risk of Conversion	<p>During workgroup sessions and other venues, the single criterion that seems to have been best supported as the a "middle ground" on this issue is commute time. Thirty to forty-five (30-45) minutes one-way to town/work seems to be about the range that most people are willing to drive, with longer commute time not uncommon, particularly if it "buys" a home in the country.</p>
29	Shayne Green	Acquisitions	Infill and Risk of Conversion	<p>The degree of "subdivision and development threat" may vary for different projects/properties. This should be captured in the scoring guidance for the "infill" Selection Criteria, not the "infill" Eligibility Criteria.</p>
30	Shayne Green	Acquisitions	Infill and Risk of Conversion	<p>Generally speaking I encourage the SALCP to avoid employing metrics and statistics as a basis for Eligibility under the "infill" criterion unless those metrics/statistics are clearly supported by a wide array of stakeholders as having merit across the state. Often such use of metrics/statistics rests on simplified theoretical models that poorly account for the complex dynamics of development pressure across the state and their actual effects on real places and real lives.</p>
31	Shayne Green	Acquisitions	Infill and Risk of Conversion	<p>Residential and rural residential development pressure on ag lands is not necessarily correlated with population growth in the nearest town, city, suburb, or other metro area. Migration of wealthier and/or retired people from urbanized areas with strong economies into rural areas where land/housing prices and living expenses are low pushes working families into other areas of the state (or country), sometimes driving net local population declines even as shotgun style sprawl takes root in outlying ag lands. As noted above, I encourage the SALCP to avoid placing too much emphasis on population growth statistics that do not capture the full story when making eligibility determinations.</p>
32	Shayne Green	Acquisitions	Infill and Risk of Conversion	<p>Recommendation: Substantially loosen eligibility criteria under the "infill" Criterion compared to Round 7. If objective criteria/parameters are to be employed, use "one-way commute time to town is 45-minutes or less" as a qualifying threshold. (Reference comments 26-31 for background)</p>
33	Shayne Green	Acquisitions	Infill and Risk of Conversion	<p>Recommendation: Let the relative strengths/weaknesses of projects under this "infill" Criterion sort out in the Selection Criteria scoring, not in the Eligibility determination. (Reference comments 26-31 for background)</p>

34	Shayne Green	Acquisitions	Infill and Risk of Conversion	Recommendation: Create a venue in which the SGC’s thinking on projects that “support infill and compact development” versus those that do not is visible to the public. This might include research papers, professional opinion papers, etc. This would build trust, support DOC staff on the front lines who have earned and deserve it, and foster more rigorous thinking on how to best accomplish AHSC and SALCP goals in the state. (Reference comments 26-31 for background)
35	Shayne Green	Acquisitions	Environmental Co-benefits	<p>The Guidelines have a good list of environmental co-benefits. However, as noted above, PRC 75212 treats lands of "special environmental significance" as something more than a mere "co-benefit." Note that co-benefits currently account for only 5 of 100 total points possible under the Guidelines Selection Criteria. I acknowledge that some of this "significance" might be captured under the "Other Program Goals" category.</p> <p>Recommendation: Create a more heavily weighted Selection Criterion that includes "Lands of Special Environmental Significance." Consider linking the "factors considered" to natural resources described in Government Code Section 65041.1 which the AHSC statute point to for direction (or combine that list of resources with environmental co-benefits already included in the Guidelines.</p>
37	Shayne Green	Acquisitions	Title Due Diligence	In far northern California, the recent real estate boom has stretched small local title companies beyond their capacity to produce title reports and execute transactions in a timely manner. Particularly for title reports on larger properties that require more research, it can take months for a company to produce a title report. This delayed processing disadvantages projects that are otherwise positioned to meet SALC's pre-application and full-application requirements. Compounding this problem, a landowner's recent request to a local title company to produce a report at its specified fee was denied because the CE purchase/sale was not yet in escrow with a land trust. This prevents the landowner from undertaking its own due diligence/preparatory work while agreements are being developed with an "easement buyer," further setting back the timeline for title report preparation.
38	Shayne Green	Acquisitions	Title Due Diligence	Recommendation: Consider making the PTR requirement "strongly recommended" at the pre-application stage and required at the full application stage. If applicants do not submit a PTR during the pre-application stage, then they assume the full risk that a project will be found ineligible at the full application stage. (Reference comment 37 for background)
39	Shayne Green	Acquisitions	Title Due Diligence	Recommendation: Allow a "Condition of Title" report to be submitted in lieu of a preliminary title report. This is a small band aid, but under certain limited circumstances may allow a landowner to make progress toward meeting the title report requirement while undertaking the process of land trust engagement and associated agreements that precede escrow. (Reference comment 37 for background)
40	POST/SCVOSA	General	General Support	We support the streamlining of selection criteria for the conservation easement and fee acquisition grants and taking a portfolio approach that prioritizes protecting agricultural lands at risk of conversion. We were also pleased to see the addition of capacity grants and the expansion of the SALCP planning grants to \$500,000. Both provide support for entities with limited means that are working to support the state’s farmland conservation goals, and to do so in a collaborative way.
41	POST/SCVOSA	Capacity Grants	Grant Term	Our only recommendation for capacity grants is to clarify in the Grant Term section, whether an applicant would be allowed to reapply – or to extend - for more capacity funding after the initial 3 year term? We know grantors are typically careful not to create a dependency on grant funds, especially for staffing, however, it can sometimes take a longer time for young organizations to establish self-sustainability.
42	POST/SCVOSA	Acquisitions	Associated Costs	We are pleased to see that applicants may receive \$50,000 for “Associated Costs”, or more if additional costs are justified. We recommend clarifying how acquisition associated costs interact with similar costs if also applied for through a capacity grant.
43	POST/SCVOSA	Acquisitions	Fee Acquisition Conditions of Funding	We are also pleased to see continuation of the \$10,000 available for a Conservation Management Plan or a Carbon farm Plan, and that the program allows for one year after close of escrow to complete the plan and have it approved. The one year time period after close of escrow is much-needed, as it is very difficult to start the planning process prior to completion of a transaction with the seller.
44	POST/SCVOSA	Acquisitions	Infill and Risk of Conversion	The narrative approach embraced in these draft guidelines is strongly supported by our agency as it will allow more flexibility in establishing how a project supports the goals of the program and, ultimately, related State goals for climate, etc. In many ways, this should make it easier for applicants with limited technical capacity to make the case for the value of their project. However, we suggest making available additional guidance to applicants, especially those new to the program, on how best to describe threat of sprawl or other forms of land conversation, to help ensure those lands most at-risk are fairly represented in the application process.
45	POST/SCVOSA	Acquisitions	Equity	We are in strong support of the opportunity to purchase land under fee acquisition, as was initiated in the last round. Such transactions support the “Buy/Protect/Sell” model that is so important in many instances to ensure permanent protection of land where willing sellers are not interested in conservation easement transactions, and, importantly, to promote land access opportunities for priority populations. We suggest making clear reference to encouragement of the Buy/Protect/Sell model in the fee acquisition section, and that resale to a member of a priority population within the 3 year period after initial acquisition is strongly encouraged.
46	POST/SCVOSA	Acquisitions	Fee Acquisition Conditions of Funding	The covenants that run with the land for fee acquisitions include reinvesting lease revenue on the property or in pursuit of additional agricultural easements, which we support. It should be clarified that this covenant only persists as long as the conservation organization is holding the property in fee, not after resale subject to a conservation easement.
47	POST/SCVOSA	Acquisitions	Soil Quality	When referring to description of soil quality, we suggest using gSSURGO data for cultivated lands in addition to rangeland as it focuses primarily on composition of soil, not current uses, as in FMMP. We also suggest over time, updating FMMP to focus primarily on soil composition so that lands currently fallowed but capable of productive yields are not excluded.

48	POST/SCVOSA	Planning	Eligible Applicants	We support the continued availability of planning grants and suggest expanding eligibility of those who may apply as partners to an entity with land use authority, to include special districts with a mission related to agricultural preservation.
49	POST/SCVOSA	General	Tribal Engagement	We are very supportive of the elevation of Tribal Groups throughout the draft guidelines and especially appreciate the desire to allocate 5% of available funding for acquisition grants to farmers that are members of a Native American Tribe. This builds upon the work of the State to improve relationships with the Tribal governments and organizations in California.
50	POST/SCVOSA	Appendices	Priority Populations Map	<p>Per prior discussion with Department staff, especially as related to SB 732 (Stern, 2017), farmland of local importance constitutes a critical priority for protection in our region – and, we would expect, likely in others - as it has been identified in the Santa Clara Valley Agricultural Plan.</p> <p>We suggest including farmland of local importance and farmland of local potential, both of which are indicated on the Department’s Important Farmland Finder FMMP mapping tool, in the map in Appendix I. Without these layers included, those unfamiliar with the classifications receive a misleading impression of “Important Farmland” as the exhibit is titled.</p>