

## 2015-16 SALC Program Final Guidelines Comments Compilation

### Overview:

- A total of 43 people attended the workshops (excluding DOC, CNRA, and CDFA staff);
- 19 comment letters were submitted, representing 48 different organizations;
- 1 comment email was submitted;
- A total of 157 comments were submitted in the letters, emails, and workshops; and,
- Organizations that submitted comments included four resource conservation districts, 21 land trusts/conservancies, two open space districts/authorities, five local governments and coalition of governments, two farm bureaus, three building/business/realtor entities, and several sustainable agricultural for-profit and non-profit groups. Refer to separate list of reviewers.

### General Comments: 35 comments

Overall, comments provided indicate that the SALC Program has been well received. Seven comments, which include input from three separate coalitions representing 33 organizations, were in support of increased SALC Program funding to \$40 Million and/or supporting the cap increase to the strategy and outcome grants.

Three comments suggested integrating SALC Program funding decisions with the Sustainable Communities Strategies (SCS) implementation.

Two comments suggested flexibility to avoid excluding southern CA agriculture.

Two comments suggested including potential carbon sequestration in addition to measuring GHG reductions.

Two comments, including those from a coalition of 22 conservation organizations, requested expanding the co-benefits of agricultural lands to include the following co-benefits:

- Water conservation;
- Nutrient cycling;
- Preservation of small, family held farms and ranches;
- Groundwater recharge; and,
- Flood control.

### Strategy and Outcome Component: 20 Comments

Six comments expressed concern that the proposed reimbursement requirements to the Strategy grants will be a significant barrier to participation, especially those counties or cities having disadvantaged communities. Of these comments, a coalition of 22 conservation organizations, suggested paying 50% of the award up front, allowing up to three years to produce the deliverable with the remaining 50% payment provided after final deliverable is produced.

Two comments requested not requiring an SALC Program-funded ACE as part of the Strategy and Outcome Component for the Agricultural Land Mitigation Program, Agricultural Easement Purchasing Program and the Agricultural Greenbelt and Implementation Agreement Program.

Three commenters suggested adding under the Strategy and Outcomes Component:

- “Other Outcomes” proposed by the applicant that increase agricultural land conservation and reduce GHG emissions.
- Policies and programs that protect urban/periurban agricultural land.

One comment suggested allowing more time to prepare and submit an application, another suggested more than one deadline. The remaining comments generally consisted of questions and suggestions to clarify terms or qualification of the applicant (e.g., minimum in zoning minimum for designated strategic agricultural areas).

Agricultural Conservation Easement Component: 98 comments

The Agricultural Conservation Easement Component comments can be divided into three related categories: Eligibility/Selection Criteria, GHG Quantification Methodology, and Other Requirements.

*Eligibility/Selection Criteria:* Of the comments received on the Agricultural Conservation Easement Component, 26 comments were criteria-related. Five of the comments suggested loosening the eligibility criteria in some fashion, such as including open space lands, temporarily drought-stricken agricultural land, and land with severed mineral rights. One comment suggested not disallowing parcels that may be subminimum zoning, yet still legal, non-conforming parcels, and another to allow certificates of compliance to count. The impact of the drought was raised numerous time in terms of eligibility as mentioned above, and in terms of agricultural viability in general.

*GHG Quantification Methodology:* For this category there were 41 comments. Most of the comments were related to either the Conversion Risk “Options” or GHG Quantification.

Conversion Risk “Options”:

- Two comments noted that the number of legal parcels (or potential legal parcels) within a rural area is a better gauge of conversion risk than compared to current zoning density.
- Four comments which included one coalition submittal suggested incorporating more flexibility into the Options, such as including the phrase “reasonably proximity” instead of strict distance measurements, increasing the distance to all options, and reaching back 10 ten years instead of three or five when considering evidence of conversion risk (particularly due to the recession).
- Two comments suggested that a more “sophisticated and realistic” approach be used to determine the number of dwelling potentially extinguished. The suggestion was made that the general plan of the city into which the land would logically be annexed would be a more reliable indicator of potential dwellings that could be extinguished.
- The balance of the comments/questions sought clarification (e.g., where to find additional information.)

#### GHG Quantification:

- Eight comments suggested that the current measures of GHG emissions are too narrow and should be broadened to include emissions beyond VMTs and residential development, such as construction of buildings, upzoning, rangeland conversion to irrigated farmland, and carbon sequestration. Of these eight comments, a coalition of 22 conservation organizations commented that upzoning in GHG quantification should depend on typical residential zoning in California (e.g., 6 units per acre).
- Four comments requested providing quantification methodology for commercial and industrial conversion threats.
- Three comments suggested that the GHG emissions should be considered and compared across existing uses -- conventional agriculture, organic agricultural, rangeland and open space. Less carbon intensive uses could then be prioritized.
- Two comments suggested measuring GHG reductions per dollar, as an indicator of cost effectiveness.

*Other Requirements Related-* Of the 98 comments received on the Agricultural Conservation Easement Component, 31 were other requirements related:

- Three comments revolved around the timing and funding for appraisals, noting that appraisal are expensive and difficult to pay for upfront, and that SALC Program money could be set aside for such costs.
- Two comments suggested including fee title land acquisitions as eligible for SALC Program funding.
- Two comments suggested considering the ability of the applicant to leverage other GGRF monies.
- One comment requested that the SALC Program provide funding for construction of farm labor housing on ACE-protected lands.
- One comment suggested a rolling application cycle.
- Two comments suggested that the political environment in which land trusts operate be considered.
- Remaining comments were observational or for clarification (e.g., preproposal due dates, when appraisals are needed).

Land Management Incentive Component- 6 comments

- Two comments addressed using compost as a model practice to reduce GHG.
- One comment, submitted by a coalition of 22 conservation organizations, recommended that landowner participation in the Land Management Incentive Component does not become a requirement with SALC Program ACE awards.
- Three comments requested that this component be activated soon.