

Yellow=Provisionally Disagree	
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PARTNERSHIPS AND COLLABORATION	
	Under collaborations and partnerships, we believe it is important to include efforts for state land managers to work closely with federal land managers to increase management compatibilities and corridors and other mutual strategies between federal and state lands in CA.
1. Explore opportunities to partner with California Native American tribes to accelerate nature-based climate solutions through, for example, nature-based workforce development, capacity building, co-management and co-ownership agreements, and land returns.	Many of the 182 "opportunities" deal with Tribes and Tribal inclusion and opportunities; in general we strongly support these initiatives when they are truly protective of ecosystems and support equitable access to the benefits of nature and climate investments. See also the caveats under #2.
2. Collaborate with tribal partners to incorporate tribal expertise and Traditional Knowledges to better inform prescribed burning plans and coordinate healthy forest management activities.	As noted in our comment letter, we do not support aggressive forest thinning and vegetation management as "healthy forest management actions" or wise "climate smart" investments in backcountry areas beyond the wildland-urban interface.
3. Facilitate and resource local, state, federal and tribal government partnerships to increase prescribed burns, accelerate healthy forest management actions, and foster increased coordination and information sharing.	See #2
4. Launch a partnership dedicated to greening every school yard in California, prioritizing schools in climate vulnerable communities.	See #16
5. Set climate smart land management goals on publicly and privately owned lands.	Climate smart land management goals could be useful, but only if those goals are well defined and truly protective of ecosystems and support equitable access to the benefits of nature and climate investments.
6. Launch the Healthy Soils Partnership Framework, in which partnerships with the private sector, philanthropy, NGOs and federal government fund training, incentives, and infrastructure for healthy soil management practices.	We agree that a Partnership Framework is important and encourage the state to also be a funder.
7. Explore incentivizing climate smart land management through state transportation infrastructure funding programs, as recommended in the Climate Action Plan for Transportation Infrastructure.	See #5
8. Convene Nature Based Solutions Leadership Circles to support successful and urgent implementation in communities, regions, and sectors across California.	This should be a high priority to ensure that there is a consistent mechanism for feedback from communities in support of implementation. As this action is advanced, consider how the composition of these leadership circles will be adequately diverse to reflect the range of interests and perspectives in communities across the state, and strongly consider how these Leadership Circles can also be coupled with additional public engagement opportunities to advance transparency, accountability and collaboration.
9. Support high road nature-based solutions workforce programs that advance California's environmental, equity, and economic goals.	Unclear what is meant here. We would support such programs only for "nature-based solutions" that are truly protective of ecosystems and support equitable access to the benefits of nature and climate investments. For example, we support community college programs for farmers, farm managers, crop consultants, pest control advisors and scouts to learn and gain experience in ecology based soil and pest management.

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10. Add collaboration and partnership with California Native American tribes as requirements in relevant grant funding programs.	We believe that tangible opportunities for investing in partnerships as suggested here must be heavily prioritized to ensure that this initiative has the power to meaningfully drive local/regional environmental, equity, and economic priorities as suggested in recommendation #21. With this in mind, we suggest you consider adding frontline environmental justice community partners—representing communities most impacted by climate change, lack of access to nature, and development—as specified and required partners/collaborators in relevant grant funding programs.
11. Work with California Native American tribes to incorporate Traditional Knowledges into innovative and sustainable cropland management plans.	
12. Explore opportunities to increase and improve data collection that supports climate smart land management outcomes for interested landowners.	Note: as it pertains to agriculture, baselines for three main systems are needed: chemical input-based, biological input-based, and biodiversity based farming systems with goals for transition of chemical to biological input-based and both input based systems to biodiversity-based systems.
13. Partner with relevant retailers to allow shoppers to add money to their purchase that will support climate smart land management – outdoor apparel industry, supermarkets/co-ops/farmers markets, etc.	
14. Collaborate with Visit California to increase public awareness and contribution to nature-based solutions with tourism-based businesses that rely on healthy natural and working lands (ex. wine, recreation, and hospitality industries).	
15. Partner with the federal government to support research that will increase our understanding of the risk mitigation potential of climate-smart strategies on croplands, forests, grasslands, and shrubland and chaparral. There is currently a lack of research and information to enable many climate smart land management practices to meet FEMA Benefit Cost Analysis requirements. Investments in measurable/quantifiable risk mitigation benefits from climate smart practices that are eligible for FEMA Hazard Mitigation Assistance funding would provide more opportunities to leverage state and federal funding. This research should also incorporate information on future climate risk, not just backward looking risk data.	Not enough explanation is given on what is meant, or implied, by "risk-mitigation potential," and "climate-smart strategies," which are not defined or explained either.
16. Convene utilities, water districts, and local governments to identify how rate payer and other local funds can be distributed or coordinated in a manner that accelerates urban reforestation.	For both #16 and #4 regarding schoolyards: These references to urban greening are an especially important part of the Climate-Smart strategy document. Urban greening is likely to be even more relevant here than in the upcoming Pathways document; all urban ideas are worth supporting, but it needs in general to be more more explicit on how they can be funded. This applies also to at least the following items: for #22, to include urban solar here; 76, 78, 90, maybe 103, 112, 113, 115, 129, 135, 137-c, 151, 152, 153, 174, and 176—but there should be MORE info, more recommendations on linking together urban green spaces via green corridors or boulevards.
17. Launch a Manure Products Working Group to address water quality and climate issues and identify synthetic fertilizer alternatives.	
18. Create an information clearinghouse for woody biomass feedstock supplies, to support end-use and tracking of feedstock generation.	As noted in our comments on the Forests section, we do not support bioenergy in conjunction with commercial thinning. Such projects use the public's money to extract resources from lands the public owns in ways that are less desirable for the environment and in areas that will not provide the largest benefit to the public by way of climate resilience or wildfire safety.

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19. Partner with coastal landowners to create collaborative projects that protect and adapt shorelines to sea level rise impacts.	
20. Update/adopt Local Coastal Plans to include nature-based climate solutions.	
21. Support communities and local governments to identify opportunities to support climate action on California's natural and working lands that also deliver on local/regional environmental, equity, and economic priorities.	This is top priority, similar to #8, for ensuring that this work is most relevant to and supportive of communities. Public engagement to identify and develop these opportunities should be a more immediate priority to develop what this participation and these partnerships looks like.
22. Identify and remove barriers for small businesses in nature based industries and provide new incentives to open new business in these industries.	We would support small business incentive programs only for "nature-based solutions" that are truly protective of ecosystems and support equitable access to the benefits of nature and climate investments. For example, we support programs for farmers, farm managers, crop consultants, pest control advisors and scouts that implement ecology based soil and pest management.
23. Partner with the nursery industry to develop a broader variety of tree/plant species that are climate smart and noninvasive.	Promoted species should be non-invasive and have good potential for carbon sequestration.
24. Partner with local health departments, tribal health consortia, and other public health partners to maximize the health benefits of nature-based climate solutions.	To address important and pressing environmental justice concerns, we believe that these types of partnerships must be top priority. Fundamental to these partnerships must be a requirement that public health impacts data is used in a tangible way to prioritize and target investments for impacted communities.
25. Build and maintain regional approaches to improve the health and resilience of California's diverse landscapes by supporting and utilizing the state's nine conservancies. The state conservancies work directly with regional partners, understand regional needs and challenges, and support work to restore resilience, while improving the environmental, economic, and social well-being of the Region's they serve.	
SCIENCE, RESEARCH, DATA, AND ANALYSIS	
26. Lands and coastal waters should be evaluated for current and historical carbon storage, the potential for future carbon sequestration with restoration or management, and the stability of the stored carbon and risk of carbon loss due to climate change or land use change.	We believe that ALL lands and waters in their natural states have value as carbon sinks and climate stabilizers. So while we support the evaluation of various land cover types and aquatic areas for their carbon storage value, none should be treated as sacrificial if current science does not find them as "carbon rich" as another type. The precautionary principle should be used and all intact ecosystems should be prioritized for conservation and to avoid disturbance. Already-disturbed or degraded lands should be the focus for future development. When intact habitats are targeted for development, full accounting should be made of all their values, including biodiversity, open space for people, and climate stabilization. It is particularly important to include deserts and desert soils in these evaluations.
27. Identify statewide foundational natural and working lands data sets and the staffing and infrastructure needs to support their analysis, use, and appropriate updates. These include high resolution topographic, vegetation, land cover, land use and supporting scientific sampling and should be made openly available to all users when possible.	The primary data sets needed for croplands are whether the farming system is chemical input-based, biological input-based or biodiversity based.
28. Align the use of tools such as TerraCount and COMET-Planner with GGRF programs and investments so that more programs can support the implementation of climate action plans integrating nature-based climate solutions.	We hope this means the Merced County TerraCount tracking tool will be easy and inexpensive for local jurisdictions to incorporate in their Climate Action Plans.

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29. Connect land use decision makers with technical and analytical resources to better price risk into land use decisions and minimize liabilities to local taxpayers or the state.	Siting decisions for utility scale renewables and new transmission corridors should incorporate the costs of the resultant loss of carbon sequestration and biodiversity.
30. Support tribal elders and cultural practitioners to research Traditional Knowledge and develop baselines of historical conditions.	
31. Expand ongoing utilization of airborne and satellite remote sensing data to assess the efficacy of nature based solutions and other management measures in providing multibenefits in the face of a changing climate.	
32. Convene experts to develop recommendations on the role of crop insurance and risk management in incentivizing and disincentivizing climatesmart practices.	Crop insurance agents use tools and calculators for premiums developed from chemical input-based systems and least of all in biodiversity-based systems. Agents tend not to visit organic and biological-input based farms to learn about the greater resilience. Sometimes they won't even insure such farms.
33. Develop new and/or amplify existing tools that will support California Native American tribes and land managers in understanding the impacts of climate change, and that will facilitate resource-sharing in the event of climate disasters.	
34. Research ecosystem services valuation to account for the benefits of naturebased climate solutions in California. For example, ensure that nature-based carbon sequestration projects in critical watersheds account for and utilize the value of resulting water savings. Incorporate pricing strategies into state investment decision making to value land-based systems and benefits not currently captured.	
35. Convene California experts to estimate the funding gap to implement naturebased climate solutions needed to deliver ambitious climate action on our natural and working lands.	To be useful this must include actual commitments for state funding.
36. Conduct economic analysis of climate smart practices to increase understanding of short and long term economic feasibility and economic benefits of implementing climate smart land management practices.	Care is required to consider the value of all costs and benefits, including social, public health, and natural resource conservation benefits.
37. Use public health, climate change vulnerability, job quality, natural cultural resource, and cultural landscape protection indicators to inform climate smart land management decisions.	
38. Research the impacts of human activity and disturbances on deserts. Use this information to determine the degree to which protecting the soil and vegetation will limit/minimize the impacts from ongoing disturbance or habitat loss and contribute to carbon neutrality and climate resilience.	As detailed in the Sierra Club's Inland Deserts 30x30 Working Group comment letter, there is quite significant work already being done to understand the climate impacts of disturbances on desert soils and these studies need to more robustly inform our understanding of the climate values of desert carbon sequestration.
39. Fund research that identifies coastal areas suitable for wetland restoration.	
40. Collaborate with tribal partners to incorporate tribal expertise and Traditional Knowledges in data collection and research.	
41. Identify research opportunities to accelerate healthy soil management practices.	Healthy soil management practices should be defined.
42. Research the feasibility and design of a transfer of development rights program in California to mitigate greenhouse gas emissions by preserving landscapes needed for carbon sequestration/storage, protecting natural areas, safeguarding water supplies, and protecting vulnerable communities.	https://conservationtools.org/guides/12-transfer-of-development-rights

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<p>43. Improve climate and carbon sequestration science related to healthy soils: ° Improve documentation on sequestration to support funding and resources, increase understanding about the results of specific practices, the longevity of benefits, and where implementation is most efficient. ° Increase soil sampling density and frequency throughout natural and working lands; compile a soil sample database and maps to help set and assess progress toward carbon targets that incorporate soils. ° Partner with California Native American tribes to incorporate Traditional Knowledges and tribal expertise into healthy soils practices.</p>	<p>We strongly endorse—also cross reference these data to verify/assess geospatial mapping and modelling. It's important to include desert soils in this science and documentation.</p>
<p>44. Develop and standardize environmental and community impact accounting practices, in partnership with local governments.</p>	
<p>45. Support studies that analyze impacts of climate change on natural resource availability, especially groundwater.</p>	
<p>46. Support identification of innovative and environmentally safe solutions to post-fire salvage logging, where merchantable logs are being chipped and sent to landfills. For example, storing post-fire salvage logs in reservoirs could help promote carbon sequestration by preserving the logs until there is capacity for them to be milled.</p>	<p>As noted in the Forest section, we do not support post-fire commercial logging of public lands. Hazard tree removal should be limited to places where trees might cause harm to people or infrastructure.</p>
<p>47. Support use of mass timber manufactured from dimensional or structural composite lumber sourced from forest management activities (i.e. small diameter, mostly) through testing how different species (and different diameters) behave in different types of mass timber (ex. cross-laminated timber vs. Mass plywood panels).</p>	<p>As noted in the Forest section, we do not support commercial thinning of public lands outside the wildland-urban interface.</p>
<p>48. Research and assess current and future impacts to California's coastal ecosystems, species, and cultural resources due to climate change and changing ocean conditions.</p>	
<p>49. Expand long-term monitoring of key species, habitats, and oceanographic variables to support multiple priorities in ocean and coastal management (e.g. marine protected areas, kelp forest ecosystem resilience, etc.).</p>	<p>Long-term monitoring as described is vital to success, therefore it's important that there is a clear strategy that indicates both who will be responsible for this monitoring and how it will be funded. Without the monitoring of ecological conditions and the analysis of the results of careful management we cannot know if climate smart action is working. In particular, grazed lands must be carefully monitored to assess ecological conditions and determine if all species expected to be there, and historically present, are still thriving.</p>
<p>50. Scale up pilot kelp restoration projects, and use results to develop a statewide kelp restoration "toolkit" that includes information on the environmental and ecological circumstances under which various kelp restoration options are likely to be most effective. Develop methods to predict changes in kelp abundance based on known drivers.</p>	<p>As noted in our comment letter, protection and restoration of seagrasses and seaweeds in their natural ranges should be prioritized but broader aquaculture and "farming" of kelp and other species should be approached with caution to ensure that other native species are not disturbed or displaced.</p>
<p>51. Develop an approach for predicting climate-driven changes in rocky intertidal and beach ecosystems, including habitat loss due to sea level rise and species range shifts due to ocean warming. Identify the most endangered rocky intertidal and beach habitats.</p>	<p>Specify WHO will develop "an approach"—the CNRA?</p>
<p>52. Develop a state-wide network of reference sites (for wetlands, seagrasses and kelp) and associated monitoring programs against which restored habitats are compared. Reference analogous, naturally occurring habitats to assess the trajectory of restored habitats.</p>	<p>Specify WHO will develop "a statewide network of reference sites"—the CNRA?</p>
<p>53. Consider using the Canada National Forest Carbon Monitoring, Accounting, and Reporting System in California.</p>	

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54. Improve data collection and dissemination on all natural and working lands to track current management practices as well as the goals of those actions. This effort will help determine how actions and their intended outcome affect carbon stocks through time.	
55. Improve and centralize tracking of state supported/authorized climate smart land management actions.	See items #5 and #7, for need to carefully define what is meant by "climate smart land management"; details are important; there may not be a one-size-fits-all solution for all ecoregions.
56. Streamline climate quantification tools required by state programs and provide common metrics and guidance to estimate and track climate benefits associated with climate smart land management actions. This will increase use of these tools, allowing for more consistent and comparable data across programs and accelerated climate action in the natural and working lands sector.	
57. Require monitoring and evaluation programs for living shorelines and dunes projects for sea level rise resiliency and wetland restoration projects to inform best practices.	
58. Identify measurable economic or public health benefits to disadvantaged or low income agricultural workers, including improved safety associated with the use of safer, more sustainable pest management tools and practices or increased wages due to higher organic commodity prices as a result of intersecting conservation and climate efforts.	
59. Build community capacity, particularly through younger generations. Structural racism has especially impacted the capacity of communities of color to undertake community development projects. Proactively resourcing technical assistance and capacity building in vulnerable communities more generally is a key part of improving community investments. For example, state funded "access" grants should support community organizing across vulnerable communities to address the structural challenges to access. This is particularly important for the younger generations who will inherit the results of many actions taken today and need to be set up with the tools to grow and lead these projects in the future.	
60. Launch a Nature-Based Solutions Technical Assistance Initiative to support and increase the capacity of California landowners, Native American tribes, land managers, communities, and others to accelerate climate smart land management in California. Specific technical assistance may include: ° Facilitating meaningful community engagement. ° Identifying opportunities to incorporate nature based climate solutions into relevant plans, programs, and infrastructure investments, based on community input. ° Utilizing relevant tools to quantify climate outcomes. ° Connecting funding needs with opportunities. ° Building capacity to propose, develop, implement, and maintain nature-based solutions. ° Providing guidance and training on management actions to achieve durable climate benefits. ° Supporting networks for sharing resources and best practices on climate smart land management.	
61. Partner with community-based organizations, landscape architects, urban foresters, urban agricultural experts, and developers for five years to support the efforts of communities, local and regional governments, California Native American tribes, and others to implement naturebased climate solutions. This support could include technical assistance, training, and comprehensive, community-led planning processes.	

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62. Increase culturally-sensitive and relevant technical assistance and ensure an accessible application process for climate smart land management resources.	
63. Reconvene the Climate Smart Infrastructure Working Group to develop design guidance and best practices for priority nature-based climate solutions.	Needs definition on "best practices" to be useful.
64. Analyze engagement of climate vulnerable communities in efforts to support climate smart land management, to understand whether adjustments in the outreach approach to these partners are needed.	
65. Develop a menu of options for new planning strategies, policies, and incentives to help direct growth away from natural and working lands, to protect and conserve open space, and critical natural infrastructure at the urban edge.	How will such growth be directed away from natural and working lands--which includes most lands--and instead keep it as infill in already-developed lands? This is ambitious and could be very important if better defined with a plan and specifically described.
66. Develop guidance on ways to elevate climate smart land management strategies in local (City and County) land use and related plans, such as General Plans, Climate Action Plans, transportation and community resilience plans, groundwater sustainability plans, drought response plans, hazard mitigation plans, and housing plans. Link these to state incentives and regulations.	
67. Support large-scale restoration and stewardship of less productive agricultural landscapes for climate resilience through funding and the development of guidance and implementation strategies.	
68. Establish best practices to guide broader application of conservation and cultural easements to support achieving carbon neutrality and/or building climate resilience.	
69. Create a Best Management Practices training for preventative fire management and thinning, working with appropriate state and federal agencies, community colleges, and tribal representatives.	As noted in the Forest section, we do not support commercial thinning of public lands outside the wildland-urban interface.
70. Support, promote, and provide technical assistance for land use analysis tools available in California to help inform complex land use decisions and optimize climate benefits in local jurisdictions.	
71. Create a one-stop shop for California state climate smart land management programs, funding, tools, and information.	More information is needed here too: sounds good, in theory, but difficult in practice--so, unless very limited in scope, probably not practical.
72. Create a California Native American tribal one-stop shop for tribal specific climate smart land management programs, funding, tools, and information.	
73. Host new and expanded natural and working lands data sets on CA Nature as an authoritative clearinghouse of natural and working lands data for local planners.	

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74. Build out a robust nature-based solutions public awareness campaign to help people understand the benefits of these actions and empower them to contribute. ° Draw connections between the climate benefits of natural and working lands and healthy food, community safety and public health. ° Support demonstration projects to encourage acceptance: farmer-to-farmer, neighbor-to-neighbor, municipality-to-municipality. ° Host annual nature-based climate solutions forum to increase public awareness, explore current issues, exchange lessons learned, build networks, address critical challenges, report on progress, etc. ° Take into consideration language access needs, including translation of accompanying visuals, handouts, and presentations. Local communities need information in plain, straightforward language, avoiding technical terms as much as possible. ° Provide culturally relevant and sensitive messaging, if feasible, with input from our partners (i.e., California Native American tribes, NGOs, CBOs, etc.)	
75. Develop a nature-based solutions curriculum for California public school students.	
76. Support regular and sustained access to nature for California's youth through schools, community-based organizations, recreational opportunities, and more.	Yes, very much needed and valuable--but avoid, and prevent use of plastic grass (artificial turf) which does NOT offer nature access.
77. Amplify the benefits of healthy soils practices on water quality in Irrigated Lands Regulatory Program guidance.	Healthy soil management practices should be defined.
78. Work with and advise local governments on strong policies and plans for improved management of urban forests. Facilitate adoption of best management practices to improve long term urban forest outcomes and achieve local and statewide goals.	
79. Create a toolkit to advance inclusion of cultural heritage into climate vulnerability index assessments to create more holistic, intersectional, and larger landscape tools to inform climate action decisions.	Definition needed on who will create the toolkit.
80. Support pathways for California Native Americans to effectively share traditional practices with the next generations.	
81. Explore the development of a statewide, climate-smart monitoring program.	Monitoring—with baselines, goals and targets—is extremely important for measuring results. WHO will do it?
82. Assist agricultural operations in developing and implementing climate change mitigation and adaptation plans, such as Carbon Farm Plans.	
83. Support conventional producers in transitioning to organic farm management in ways that increase biodiversity on-farm and reduce the use of synthetic inputs.	
84. Support historically disadvantaged small-scale farmers in climate smart land management through, for example: farmworker cooperatives and land trusts; first-time farm ownership assistance for former farmworkers, tenant farmers, and historically disadvantaged new and beginning farmers; grants and zero/ low-interest loans and capital assistance programs; tribally-led land-based projects; and additional financial and technical assistance programs.	
FUNDING, FINANCE, AND MARKET MECHANISMS	
85. Recognize and explore opportunities to address the barriers that may limit access to funds, such as processes that require extensive application knowledge and time, as well as funding through reimbursement that limits the opportunity to only those who are able to fund up front.	

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86. Explore opportunities to make existing and new funding for nature-based climate solutions more efficient through, for example, rolling applications; extra points for cooperation of multiple participants; increased capacity building; uniform advanced payments where appropriate; paying invoices sooner; funding total costs of project, including: planning, education, outreach, and maintenance.	Include retroactive grants for early adopter farmers of practices that require continuing investment.
87. Leverage the investment programs at IBank to attract private capital providers with an interest in supporting climate-smart land strategies.	
88. Include paid opportunities for community members to participate and contribute to climate smart land management such as native species planting, landscape restoration, and community science initiatives.	
89. Explore targeted loan guarantees to community lenders that support naturebased solutions, particularly for those traditionally excluded from investment opportunities.	
90. Support park projects in disadvantaged communities, including in rural and unincorporated communities, including for operations and maintenance.	We applaud recognition of the need for more attention to and funding for urban greening matters; but the discussion—occurring in various places in the document—is limited to promoting such urban greening from the double standpoints of equity for disadvantaged communities and for carbon sequestration potential. While we support both of these causes as vital, additional attention must be paid to urban greening for its enhancement of urban biodiversity—which is hardly touched upon in this document but should definitely be.
91. Increase the portfolio of nature-based solutions in California's federal hazard mitigation funding.	
92. Support interagency teams to expedite the permitting of large-scale restoration projects.	
93. Establish a carbon market for naturebased climate solutions that is designed to inspire/match private contributions, and be accessible to a diverse suite of project implementers.	We need a carbon market with guardrails and oversight that does not offer offsets or trading to extend emissions by other entities.
94. Explore potential new funding sources for nature-based climate solutions, such as restoring a portion of tidelands revenues for natural and working lands; leveraging insurance products to increase stability of annual expenditures and facilitate proactive investments; etc.	We would support such programs only for "nature-based solutions" that are truly protective of ecosystems and support equitable access to the benefits of nature and climate investments. Mechanical thinning in backcountry areas should not be included.
95. Identify, amplify, and access federal funds to deliver urban nature-based climate solutions in California.	See #94.
96. Explore long-term stable and dedicated funding sources for natural climate solutions; target and prioritize resources for tribal governments and historically disadvantaged communities; re-examine current funding regimes and modify them as needed to prioritize funding for community organizing and engagement. It is important to recognize and address the barriers that may limit access to funds, such as processes that require extensive application knowledge and time, as well as funding through reimbursement that limits the opportunity to only those who are able to fund up front.	We strongly support funding for community organizing and engagement, but only for "nature-based solutions" that are truly protective of ecosystems and support equitable access to the benefits of nature and climate investments.
97. Explore the potential to include endowment funding for state nature-based climate solution investments.	This could be a good finance mechanism depending on the structure, transparency, and accountability manager of the endowment.
98. Support California Native American tribes and smaller landowners with initial costs associated with developing an offset project, which are often a barrier.	

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99. Explore funding for demonstration projects aimed at improving measurement and verification practices for nature-based climate solutions.	
100. Explore tribal set asides, such as tribal-only grants, formula, and non-grant funding opportunities to support tribes as partners in implementing the EO.	
101. Work with insurance companies to lower rates for landowners implementing naturebased climate solutions that reduce risk.	
102. Work with philanthropy to create a fund that issues recoverable grants for rural climate smart infrastructure. Prioritize adding value to regionally grown materials and bridging historic wealth gaps through job creation.	
103. Explore development of a new NatureBased Solutions Bank, potentially building off of Catalyst Fund at IBank, or how to build greenhouse gas carbon sequestration into existing conservation banking.	More definition needed on guardrails, but could be beneficial using the new Public Bank opportunity to create regional Climate Smart Banks prioritizing transition to biodiversity-based farming systems.
104. Advance the combined use of conservation easements and carbon markets, using the Buckeye Forest as a replicable approach.	
105. Provide additional capital to IBank's Catalyst Fund expressly for purposes of flexible, lowinterest lending across the practices in this strategy.	
106. Reduce cost share requirements, if any, for projects on natural and working lands owned or managed by California Native American tribes and socially disadvantaged farmers and ranchers.	
107. Launch a public-private partnership to facilitate the development of new markets for nature-based climate solutions, and identify opportunities for existing ecosystem services markets to scale naturebased climate solutions in California.	
108. Consider inclusion of a wetland restoration protocol as part of California's cap-andtrade program.	
109. Develop viable financial frameworks that address the current misalignment between project structures and investment needs through, for example: ° California Native American tribes, project developers and local governments could bundle and/or diversify nature-based climate actions to achieve investment scale and reduce risk. ° Local governments and insurers could develop innovative insurance models to bring private investment and community approaches to nature-based resilience and climate solutions. ° The California Department of Insurance could develop mechanisms to increase the insurability of forest assets.	
110. Public pension leaders could promote investment in nature-based climate action that aligns with long-term funding goals.	
111. Use reverse auctions in grantee selection processes to reveal price points for naturebased climate solutions.	This could make sense to increase competitiveness & innovation and stretch funding.
112. Explore the development of a "Debt for Natural and Working Lands Program" to protect critical landscapes and acquire community parcels that can become greenspace.	

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113. Provide guidance to local governments on how to treat urban forests/greenspaces like essential infrastructure (rather than amenities) to increase access to existing local government budgets.	#113 is especially important. Most local government budgets are strapped for funding but would like to give much more priority to urban green spaces. Many or most vital infrastructure items require real money. For example, urban parks—to be most useful for equity, carbon sequestration, and urban wildlife purposes—must be linked by green corridors, or green boulevards, which may require a substantial investment in the rebuilding of some streets. See #90 also.
114. Coordinate with efforts to create carbon mitigation banks that integrate naturebased solutions.	
115. Identify and consider whether landowners eligible for climate smart land management funds live in disadvantaged communities rather than simply location of company offices, and whether investment will directly benefit the local community.	
WORKFORCE AND ORGANIZATION	
116. Explore the development of a NatureBased Solutions Workforce Development Program that is connected to regional and sector strategies and prioritizes job-seekers from climate vulnerable communities. Convene regional roundtables to identify opportunities that support local priorities as well as the hiring needs of nature-based solutions employers offering quality jobs.	Similar to #22, we would support workforce development programs only for "nature-based solutions" that are truly protective of ecosystems and support equitable access to the benefits of nature and climate investments. For example, we support programs for farmers, farm managers, crop consultants, pest control advisors, and scouts that implement ecology based soil and pest management. We would not support training for backcountry forest thinning projects or bioenergy using forest feedstocks.
117. Explore the development of a program for justice involved individuals to get training for careers in the nature-based solutions industries through classroombased learning, apprenticeships, industryrecognized certifications, hands-on community greening projects, and job application skills.	
118. Create a pipeline of trained forestry workers (arborists, tree trimmers, pruners, landscapers, etc.), freighters, and wood products industry workers; expand apprenticeship opportunities and High Road Training Partnerships in these sectors; and prioritize local job-seekers from climate vulnerable communities.	We support this type of workforce development when it is for protecting communities, not for backcountry thinning projects.
119. Support the addition of wraparound services for youth nature-based solutions workforce development programs. Examples of wraparound services include tutoring, family support, transportation, mental health services, and connections to key community resources.	We would support such programs only for "nature-based solutions" that are truly protective of ecosystems and support equitable access to the benefits of nature and climate investments. Mechanical thinning in backcountry areas should not be included. Include the development of model applications for Use of Alternate Materials & Methods so that Building and Safety Departments can streamline provision of temporary housing and a kitchen facility for traveling ecosystem restoration camps.
120. Invest in organizational diversity and capacity of nature-based solution organizations. Elevate voices by further diversifying state and regional conservancies and build partnerships with those underrepresented or missing from nature-based solutions coalitions.	
121. Create an advisory council or taskforce to support identification of any structural inequities in nature-based solutions initiatives, and opportunities to address them. Require training and resources for staff to understand the history of racism and inequity in the natural resource sector.	
122. Include measurable metrics and targets to ensure support for efforts of climate vulnerable communities to scale naturebased climate solutions.	

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123. Explore creating an Office of Small Farms within CDFA to support implementation of nature-based climate solutions on lower-acreage operations.	In both rural and urban areas.
124. Support, align, and leverage existing workforce development programs, such as the local and state conservation corps, and California Climate Action Corps, to urgently scale climate smart land management. Identify opportunities to expand successful efforts; close gaps; engage educational institutions, community based organizations and the public workforce system; expand apprenticeships and create linkages to High Road Training Programs; and leverage federal funding.	See #22, #116 and #118.
125. Partner with Labor Workforce Development Agency and the state's education partners to work with high school, undergraduate and graduate work study programs and California Native American tribes to support nature based solution work job opportunities, work-based learning, and career pathways at the community level.	See #22, #116 and #118.
126. Support financial incentives and mentorship programs for native students majoring climate smart land management fields in California Community College, California state University, and University of California schools.	See #22, #116 and #118.
127. Expand relevant education programs to increase volume along pathways to higher education disciplines in the natural sciences. Support universities and community colleges with programs that build and support the climate smart land management workforce and increase diversity within these professions. Create new apprenticeships and training pathways for these roles.	
128. Explore opportunities to increase recruitment of and training/support for registered professional foresters, including through the creation of an apprenticeship program.	
129. Coordinate all state programs engaged in urban forestry and greening - programs to utilize best planting and management practices, follow state guidance on best urban forestry practices, ensure quality job creation and connection to sustainable careers, and consult or coordinate with CAL FIRE for technical assistance– the state's designated authority on urban forestry.	CNRA needs to commit to doing this, and ensuring that Caltrans and CalFire participate. Does "state programs" include city programs? Someone must be in charge of this coordination; it won't happen all by itself. A recommendation needs to lead to action.
130. Support the California Conservation Corps' urban programs to maintain urban greenspaces and trees.	
131. Work with communities to provide training and certification for community and on farm compost development; and prioritize local job-seekers from climate vulnerable communities.	
132. Increase training and apprenticeship programs that train farmworkers to become farm managers or farm owners.	Strongly support with attention to replicating the models of Agriculture and Land-Based Training Association (ALBA) Farmer Education Course (PEPA for the Spanish Programa Educativo para Pequeños Agricultores) and Organic Farm Incubator, and the California Farm Academy near Sacramento run by the Center for Land-based Learning. There is a need for such training centers like those serving Kern, Ventura, and Santa Barbara Counties.
133. Develop community workforce agreements to scale nature-based climate solutions.	We would support such programs only for "nature-based solutions" that are truly protective of ecosystems and support equitable access to the benefits of nature and climate investments. Mechanical thinning in backcountry areas should not be included.
134. Include more experts in Traditional Knowledge and nature-based climate solutions in decision-making bodies.	

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135. Inventory unmaintained, dilapidated buildings to identify opportunities for replacement with community greenspace.	We support, but such "opportunities" for replacement won't occur unless additional funding is available from the state.
INCENTIVES AND PROCUREMENT	
136. Review existing incentives to identify and amend those that have unintended consequences for the health of our natural and working lands.	
137. Explore financial incentives for nature-based climate solution investments. For example: ° Incentivize private landowners and local governments to enter into co-management agreements with California Native American tribes. ° Incentive-based monitoring pilot program for climate smart land managers. ° Incentivize urban landowners to undertake climate smart land management actions such as creating urban landscapes that sequester carbon, utilizing drought-resistant and/or native plants, and protecting large, established trees. ° Incentivize biological agricultural production practices and inputs (such as organic fertilizers) to support healthy soils, water, and air resources and to improve health outcomes, particularly for rural agricultural communities. ° Incentivize solar developers and farmers/ ranchers to partner in development of large-scale solar projects that would protect prime farmland and diversify landscapes prioritized for solar installations, provide shade to livestock, cool soils, and provide renewable energy to the grid. ° Incentivize shading along critical waterways to cool water and protect native fish. ° Partner with banks and credit unions to identify, create, and package lending programs that incentivize small businesses to grow in the innovative wood sector. ° Incentivize large industrial landowners to employ climate smart practices. ° Create and promote land lease models that support and reward climate smart land management. ° Incentivize small timber-based businesses and foresters to provide thinning and other fire prevention services.	Include developing model agrivoltaic ordinances for counties and cities. For 137-c—urban landowners: WHO will provide these definitely needed financial incentives in urban areas?
138. Develop a climate smart certification program for products, suppliers, and purchasers that support nature-based climate solutions.	
139. Explore changes to the Williamson Act to support farmers who fallow under the Sustainable Groundwater Management Act (or pursuant to forbearance agreements or otherwise in response to drought conditions) are not penalized for doing so and address climate change. Tools like TerraCount and COMET-Planner could be used to support implementation by counties and landowners.	
140. Make organic certification easier and stronger through a program like the Renewable Portfolio Standard for organic land managers.	This is an interesting idea and we would like to understand how it would work.
141. Support fee-to-trust applications for parcels owned by tribes; waive all state tax requirements for these applications.	
142. Financial incentives for implementing climate smart land management should include requirements that benefit workers and nature. These actions must be intentional, with agreements developed to ensure communities are benefiting from projects as intended.	

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143. Explore preferential buying/procurement requirements that support nature-based climate solutions. For example: ° Establish procurement requirements for nature-based acquisitions to achieve, over time, 100% “carbon friendly/climate resilient” status; include labor, workforce, and employer/contractor standards in procurement contracts to ensure job quality, job access, and quality of work. ° Establish contracting requirements or preferential bid awards that incorporate nature-based solutions, increase the uptake of low-carbon materials derived from natural and working lands, support high road employers and jobs, etc. ° Utilize the purchasing power of state food programs such as school lunches, state-funded hospitals and prisons to prioritize procurement of climate smart agricultural products.	Many potentially good initiatives are listed here; "climate smart agricultural products" and other points need to be better defined.
144. Explore developing sole-sourcing relationships with tribes and their entities for cultural resource identification, cultural monitoring, restoration, etc.	
145. Utilize the market power of school food/EBT/SNAP programs through requiring a certain percentage of socially disadvantaged farmers get preference.	
146. Explore the potential for universal regenerative organic school meals in California.	
POLICY AND REGULATION	
147. Convene an internal working group to identify opportunities to integrate nature-based solutions into existing efforts and review existing nature-based solution efforts to ensure they are contributing to our collective climate change goals.	
148. Increase the number of climate smart properties that are SITES certified, and consider adopting this certification program into capital construction programs.	http://www.sustainablesites.org/
149. Incorporate nature-based solutions that achieve multiple benefits into the Education Department’s Construction Division regulations. Outcomes include reduced school energy costs and pollution exposure; cooler indoor and outdoor environments for schoolkids; expanded stewardship and education through food garden construction; increased access to nature.	
150. Establish an equity framework for climate smart land-related resource allocation. This would involve identifying climate vulnerable communities and prioritizing resources for them (ex. funding, loans, incentives, facilities, training, jobs, and leadership/ decision-making opportunities).	
151. Support park development in low-income affordable housing developments.	Strongly support; should be a requirement for affordable housing.
152. Add job creation, job access, and responsible employer/contractor measures (e.g., standards and targets) and job quality to procurement contracts that support climate smart land management in CA.	We support this type of requirement only if the standards truly protect nature and promote equity—and do not include activities that harm biodiversity and carbon sequestration, such as backcountry thinning projects.
153. Utilize fairgrounds for food and other resources-based industries targeting local and regional markets.	
154. Integrate climate smart land management practices and partnership into state land leases, particularly with California Native American tribes.	Many of the 182 points deal with Tribes and Tribal inclusion and opportunities; in general we strongly support these initiatives when truly protective of ecosystems and support equitable access to the benefits of nature and climate investments. See also #2, #22, #116 and #118.

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155. Require energy developers and project owners to consider alternatives to clearcutting vegetation under infrastructure, as well as opportunities for climate smart land management throughout the project's lifetime.	On #155 and #156, make sure to include this type of action for desert energy facilities, especially any large-scale ones, which also have many other undesirable aspects in addition to the removal of vegetation.
156. Prohibit or strongly disincentivize largescale clearing of native habitats.	See #155.
157. Evaluate how to phase out and ban chemicals (like glyphosate and many others) that cause biodiversity loss, chronic illness, and widespread pollution in our air and waterways.	
158. Require statewide and consistent sea level rise adaptation plans that are protective of blue carbon habitats.	
159. Implement new policies that acknowledge and respect tribal jurisdiction and rights for traditional, cultural, subsistence, and commercial harvesting, gathering, and management in all state lands, including coastal waters and state parks.	
160. Explore opportunities to include California Native American tribes in the management and decision making for state lands, waters, coastlines, and resources within their ancestral territories and coastal waters. This can be done through joint powers agreements, memoranda of understandings, and co-management agreements.	
161. Streamline compost production regulations to minimize organic waste in landfills and build healthy soils, while ensuring food safety.	
162. Amend composting policies to clarify and simplify the regulations for on-farm composting; allow for compost to be moved from one farm to another; increase compost supply; and evaluate mammalian composting.	
163. Explore opportunities to better evaluate climate smart land management activities through revisions to the CEQA statute and the CEQA greenhouse gas emissions guidelines. For example: ° Require project proponents evaluate and mitigate the greenhouse gas emission impacts associated with conversion of natural and working lands, and outline a greenhouse gas mitigation hierarchy that prioritizes mitigation locally, as consistent with the Scoping Plan. ° Require CEQA analyses to include impacts to biological carbon and loss of carbon sequestration. ° Establish a standardized mitigation program for land use conversion, subdivision, and down-zoning of resource lands to smaller ownership minimum acreages	For 163 a and b, also consider land-conversion impacts on undisturbed desert landscapes.
164. Provide a regulatory "credit" in the Irrigated Lands Regulatory Program for climate smart land management practices.	A transparent guideline is needed for Regional Water Boards determining the compensation ratios so that they exceed the permanent value of the future ecosystem services of the wetland or other natural resource loss.
165. Amend scoring of Integrated Regional Water Management Program application scoring to award higher points for priority nature-based solutions in grant applications.	
166. Ensure policies and programs support non-federally recognized tribes' ability to implement nature-based climate solutions.	
167. Amend Public Resources Code and Fish and Game Code to allow tribes to participate as conservators of lands, similar to non-profits and public agencies.	
168. Incorporate California Native American tribal considerations into the work of the Regional Water Boards.	

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169. Amend the cap-and-trade regulations to make it easier for tribal governments to participate: ° Aggregation of projects to add newly acquired parcels into compliance projects; ° Buffer swaps for flexibility to shift which parcels are held as buffers and which are used for carbon offsets; and ° Implement cost-saving measures, specifically regarding the verification of credits process.	
170. Consider recommendations from the cap-and-trade offset task force established by AB 398 that align with AB 32 requirements. Some of the recommendations include: making the program more accessible for smaller forest landowners; reviewing ways to reduce monitoring and verification costs; allowing for aggregation of projects to add newly acquired parcels into compliance projects; providing mechanism for swaps in buffer lands to increase flexibility in which parcels are held as buffers and which are used for carbon offsets; and implementing cost-saving measures, specifically regarding the verification of credits.	
171. Increase the use of easements to deliver climate outcomes; develop common easement language that could accelerate this recommendation.	Such as trails and bikeways, and CalTrans easements.
172. Expand safer, more sustainable pest management alternatives to harmful pesticides and support the increased reliance on biological pest control to protect worker and public health, and support scaled up training for integrated pest management technical assistance providers.	
173. Address barriers for implementing climatesmart practices for farmers, particularly historically underserved farmers, who lease land on agricultural land owned by nonoperating landowners.	
174. Require use of local native plants in statefunded projects involving landscaping and/ or plants, with the opportunity to provide exceptions if clearly justified (for example, for urban forestry programs and the Healthy Soils Program).	
175. Where appropriate and applicable, Departments should rely on the Class 33 categorical exemption for small habitat restoration projects in the CEQA Guidelines	Especially needed are standardized iterative plans for greening bike trails. Also, development of standardized "Alternative Materials and Methods" building codes for moveable infrastructure (kitchen, meeting space, and tents) for ecosystem restoration camps, including removal of required UL listing for solar ovens for cooking food for people in such camps.
176. Consider stricter density in local planning and zoning requirements to safeguard undeveloped land and promote infill development.	
177. Elevate the role of climate smart land management in SB 375.	
178. Streamline reporting for the Irrigated Lands Regulatory Program and other environmental compliance requirements to incentivize implementation of healthy soil management and biodiversity practices (e.g. riparian planting).	
179. Consolidate mitigation requirements through the Department of Conservation for any state required agricultural mitigation, building on their administration of HSRA's Agricultural Lands Mitigation Program.	
180. Coordinate all relevant vegetation treatment permits under the CAL VTP including permits from WaterBoards, CDFW, CEQA, and any other relevant agencies or departments to ensure wildfire resilient activities have an ecologically sound and efficient path to environmental oversight.	As noted in our comment letter, we do not support aggressive forest thinning and vegetation management as "healthy forest management actions" or wise "climate smart" investments in backcountry areas beyond the wildland-urban interface.

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181. Explore a regulatory process that combines all relevant permit processes (e.g., Water, Coastal, and Fish and Wildlife permits) into a single application to promote nature based solution projects.	
182. The Department of Fish and Wildlife should continue to explore and advance options for permitting large-scale restoration projects by means of a combined approach to a Section 2081(a) take authorization under the California Endangered Species Act and a lake and streambed alteration agreement authorization pursuant to Section 1600, et seq and look for opportunities to ensure consistency with the SWRCB’s General Order. ° Prioritize agroecological practices in agricultural climate smart land management efforts; maximize climate, public health, and economic benefits to climate vulnerable communities: Prioritize programs and projects that promote safer, more sustainable pest management practices and tools and reduce the use of harmful pesticides, promote healthy soils, improve water and air quality, and reduce public health impacts. In addition, support strategies that achieve co-benefits of safer, more sustainable pest management practices and the health and preservation of ecosystems. ° Prioritize programs and projects with measurable reductions in fertilizer runoff and leaching to reduce groundwater contamination in rural communities. ° Prioritize programs and projects that provide co-equal benefits of health and safety improvements for farmworkers exposed to extreme heat and wildfire smoke.	What are some of these large-scale restoration projects? Additional and clearer description and definition is needed here.