



# Summary of Guideline Changes: Tribal Corps Climate Bond Grant

*This summary of changes outlines the changes between the original Draft Guidelines posted for public comment through October 14<sup>th</sup> and the Final Guidelines.*

The California Conservation Corps (CCC) updated the grant program guidelines based on direct tribal feedback and new state legislation (AB 2187). The changes remove administrative barriers, maximize tribal leadership, protect cultural knowledge, and make it easier for tribes to qualify for and run these climate resilience projects.

| Topic                          | Old Draft Rule                                                                                                   | New Revised Rule                                                                                                                                                                                                                                                                                                                                                               | How it Benefits Tribes                                                                                                                                         |
|--------------------------------|------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Bidding &amp; Contracts</b> | Eligible tribes to get three separate bids for all contract work, supplies, or materials worth \$10,000 or more. | The three-bid price cap increased from \$10,000 to \$20,000.<br><br>Additionally, <b>effective Jan 1, 2027 (per AB 2187)</b> , the three-bid rule does not apply if the work can only be done by a tribe. Tribes can contract directly with their own fully owned businesses, enterprises, or subdivisions if they provide a cost justification showing standard market value. | Saves time and cuts red tape. Allows tribes to keep grant funding within their community by hiring their own tribal businesses without complex bidding delays. |

| Topic                           | Old Draft Rule                                                                                                                         | New Revised Rule                                                                                                                                                                                                                                                                                                       | How it Benefits Tribes                                                                                                                                                                             |
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| <b>Sovereign Immunity</b>       | Had generic language that did not fully shield tribal sovereignty, causing worries about potential broad or implied waivers of rights. | Explicitly states that applying for or taking grant funds does <b>not</b> cause a broad or implied waiver of sovereign immunity or rights. Waivers are a last resort. If an advance payment triggers a waiver requirement, it is strictly capped at that advance amount and auto-terminates once receipts are cleared. | Provides definite protection for tribal sovereignty. It guarantees that standard participation will never accidentally expose other tribal assets, lands, or operations to legal risk.             |
| <b>CEQA Lead Agency Support</b> | The state agency did not offer to step in as the lead coordinator for environmental tracking (CEQA) on tribal lands.                   | If a project falls under exclusive tribal or federal control and needs an environmental exemption or report, the CCC will act as the CEQA Lead Agency if no local or state public group is available.                                                                                                                  | Takes the heavy paperwork burden off the tribe. It ensures projects do not lose points or get blocked due to a lack of a designated state lead agency.                                             |
| <b>Land Control Flexibility</b> | Required traditional real estate land titles or fee-title documents to prove land control before work could start.                     | Offers maximum flexibility for projects on trust land, ancestral territories, allotments, or partner properties. Accepts flexible tribal stewardship pacts, MOUs, or written partner permissions instead of formal land deeds.                                                                                         | Respects ancestral land realities. Allows tribes to complete vital wildfire protection, cultural burning, and forest health projects on lands where they do not hold standard Western legal deeds. |

| Topic                                 | Old Draft Rule                                                                                                                     | New Revised Rule                                                                                                                                                                                                                                                                    | How it Benefits Tribes                                                                                                                                                                                                                  |
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| <b>Data Sovereignty &amp; Privacy</b> | Lacked detailed rules to protect sensitive cultural maps, specific coordinates, or traditional knowledge from public records laws. | Strictly honors tribal data sovereignty. Protects sacred sites, graves, ceremonial spaces, and Traditional Ecological Knowledge (TEK) from public disclosure. Allows generalized coordinates or buffered maps. Gives tribes discretion over the public use of their data or photos. | Protects private cultural heritage. Tribes can fully participate in the grant program and report their ecological progress without being forced to expose confidential cultural secrets or sacred site locations to the general public. |
| <b>Application Grading</b>            | Used a standard point system that could disadvantage smaller tribal staff teams who lack professional grant writers.               | The grading matrix explicitly prevents resource-constrained tribes from losing points over complex formatting. Applications are graded on core project impacts, cultural relevance, and community equity rather than professional formatting.                                       | Levels the playing field. Ensures funding goes to the communities with the highest need and most impactful project ideas, not just the teams with the most expensive grant writers.                                                     |
| <b>Upfront Cash Flow</b>              | Operated heavily on a payback (reimbursement) framework, creating immediate cash-flow barriers for smaller teams.                  | Guarantees a fast-tracked 25% advance payment upon request for any tribe showing upfront cash constraints, avoiding slow case-by-case secondary financial reviews.                                                                                                                  | Provides financial breathing room. Tribes can immediately buy necessary project vehicles, tools, safety gear, and start crew training without spending their own money first.                                                           |

| Topic     | Old Draft Rule                                               | New Revised Rule                                                                                                                                                                                                                                                                            | How it Benefits Tribes                                                                                 |
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| Key Dates | Technical Assistance and virtual office hours reflected TBD. | <p>November 9th at 2:00 PM and November 12th at 6:00 PM, CCC is hosting (2) technical assistance workshops. Virtual office hour sessions can be conducted upon request.</p> <p>Extended the proposal due date from December 21<sup>st</sup> of 2026 to January 22<sup>nd</sup> of 2027.</p> | Provides timing flexibility for tribal applicants and gives an additional 30 days to submit proposals. |