



Deputy Secretary Virginia Jameson
California Department of Food and Agriculture
1220 N Street
Sacramento, CA 95814

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Submitted via email: climate@cdfa.ca.gov

Dear Deputy Secretary Jameson,

Thank you for the opportunity to submit public comments on the California Department of Food and Agriculture's (CDFA) Climate Resilience Strategy for California Agriculture. We appreciate your leadership in drafting this important report that will ensure the state's farmers and ranchers thrive in the face of climate change. We also commend you for your efforts to bring together diverse perspectives regarding the impacts of climate change on the agricultural sector, and to build a strong case supporting the need for natural agricultural climate solutions that are cost-effective, accessible, and benefit the farmers and citizens across the Golden State.

American Farmland Trust (AFT) is the only national organization that takes a holistic approach to agriculture, focusing on the land itself, promoting the use of sound farming practices, and ensuring farmers and ranchers can remain on the land for future generations. In addition to our focus on conservation and farm viability, we have also consistently advocate for the creation of policies that will support farmers to fight against climate change. Farmers are on the frontlines of the climate crisis and play a key role in mitigating climate change through many avenues, from adopting regenerative practices which sequester carbon in the soil, to permanently protecting agricultural lands from development. We recognize that farmers need the resources to protect their land and implement climate-smart agricultural practices. These practices not only help to mitigate climate change, but they also improve the greater environment, make farmers resilient to extreme weather, and decrease food insecurity.

CDFA deserves strong commendation for its leadership in developing a Climate Resiliency Plan that charts a forward-looking vision for the state's agricultural sector. By proactively addressing the complex challenges posed by climate change, such as extreme weather, water scarcity, and shifting growing conditions, CDFA is laying the groundwork for a more adaptive, sustainable, and equitable food system.

Broadly speaking, AFT recommends that CDFA build on this momentum by providing clear guidance on the specific actions that can be taken across the sector to support climate resiliency and establishing a timeline for implementation. This will help ensure that the plan translates into meaningful, measurable plan that supports farmers, ranchers, and rural communities across California. Our comments are focused on improving *Chapter 5, Advance Energy Efficiency and Decarbonization for Agricultural Operations*, and *Chapter 6, Conserve Productive Farmland*.

Chapter 5: Advance Energy Efficiency and Decarbonization for Agricultural Operations

AFT applauds CDFA in providing a comprehensive overview of energy efficiency, electrification, and decarbonization strategies for California agriculture. AFT's solar work is guided by our Smart Solar

principles. [Smart SolarSM](#) refers to solar projects that meet three main, equally important goals: (1) safeguarding land well-suited for farming and ranching, (2) strengthening farm viability, and (3) accelerating solar energy development. Smart SolarSM guides solar development to where it has the least negative impact on land well suited for farming, ensures that agricultural land where projects are sited can be farmed in the future, and promotes “agrivoltaic” solar projects that integrate agricultural production into solar energy arrays on the same land.

We would encourage CDFA to include more in the report on the benefits of agrivoltaics and how we can advance this technology in California. Agrivoltaics provide an opportunity to further solar energy generation while keeping prime and important agricultural land in production.

California urgently needs to establish a clear definition of agrivoltaics through either administrative or legislative policy to ensure consistent implementation and support for this emerging land use strategy. As the state advances its clean energy goals, it is critical to recognize and protect agricultural viability by defining agrivoltaics in a way that centers the sustained production of agriculture throughout the full life of a solar array. This definition should be developed through a robust community input process that is led by organizations that work directly with producers, centers farmer voices and is done in consultation with conservationists, energy developers, and local stakeholders to ensure it reflects the diverse needs and realities of California’s agricultural landscapes. Importantly, the definition must align with and support a producer’s existing farm viability and conservation objectives, reinforcing the dual goals of renewable energy generation and long-term agricultural production and stewardship of the land. In February 2025, AFT released “[Policy Recommendations to Increase Agrivoltaic Development](#)”, a report that offers model agrivoltaics definition language that can serve as a starting point for the State.

The following recommendations will help integrate AFT’s Smart Solar principles into Chapter 5:

- **Elevate Agrivoltaics as a Core Strategy:** Dedicate a section to agrivoltaics as a climate-smart approach to solar development. Highlight benefits such as maintaining agricultural production, diversifying farm income, conserving water, and mitigating heat stress for farmworkers, livestock, and crops.
- **Strengthen Farmland and Ranchland Protection in Solar Siting:** Explicitly call for solar policies that prioritize siting on land that is not well suited for farming.
- **Advance Smart Solar Incentives and Technical Assistance:** Recommend creating or expanding state and utility incentive programs for agrivoltaics, including funding grants to support technical assistance for producers in planning, designing, and implementing agrivoltaic projects, establishing demonstration sites, and conducting research. Funding for research should prioritize investigating the benefits of agrivoltaics for California producers, including water conservation, crop yield impacts, farmland access opportunities, and farmworker protection against heat-related illnesses.
- **Address Equity, Community Benefits, and Farmer Engagement:** Require community and farmer engagement in solar project planning and design. Support local governments in navigating community benefits agreements and establishing land use policies to enable agrivoltaics projects.

Chapter 6: Conserve Productive Farmland

As outlined in the report, California’s agricultural lands face a myriad of conversion threats. It is imperative that the state continue to invest in and prioritize farmland and ranchland protection efforts.

Since our inception in 1980, AFT has been a strong proponent and has played active roles in the development of the state's current-use and land conservation programs. AFT has consistently supported the advancement of the California Farmland Conservancy Program (CFCP) and the Sustainable Agricultural Lands Conservation (SALC) Program. Both programs have been essential in protecting the state's working lands through agricultural conservation easements and land acquisitions, providing planning grants to local governments across California, and increasing the capacity of land trusts to protect agricultural lands.

The following recommendations will improve the farmland and ranchland conservation efforts outlined in Chapter 6:

Policy and Program Improvements

- **Modernize the Williamson Act** to boost county participation, address climate-related challenges like water scarcity and wildfire risk and enhance the long-term viability of small and mid-sized farms. This includes re-instating subvention payments. This will need to be done in consultation with the Department of Conservation.
- **Resume annual reporting** on Williamson Act enrollment, including data on participating counties, enrolled farms, and total acreage under contract. This will also need to be done in consultation with the Department of Conservation.

Support for Agricultural Land Conservation

- **Provide implementation support** for SALC Planning Grant recipients by establishing a centralized hub of policies, funding sources, and technical assistance tools that are available to fund projects, goals, and objectives outlined within SALC planning grants.
- **Develop a statewide funding roadmap** estimating the investment needed to permanently protect all remaining agricultural land in California by 2050. This report should guide future administrations, legislators, and advocates, and include annual funding targets for the SALC Program, CFCP, and other working lands protection programs.

Land Use and Energy Development

- **Work with the CA Public Utilities Commission to create a cropland-transmission overlay map** to help renewable energy, battery storage, and data center developers prioritize sub-marginal lands over high-value agricultural land for infrastructure projects.
- **Assess the impact of development pressures including those from data centers, renewable energy, and other emerging threats** on agricultural communities by drafting a report that examines effects on land prices, water access, and communities. This report should also track farmland and ranchland loss to data centers using the Farmland Mapping and Monitoring Program.
- **Increase the number of local governments to adopt in-lieu mitigation fees** to compensate for agricultural land lost to data centers, utility-scale solar, and other types of development.

Transparency and Accountability

- **Track and publicly report** how the \$200 million in Proposition 4 funds are allocated within the Multi-benefit Land Repurposing Program to ensure transparency and effectiveness.

The following recommendations will improve the State's efforts to facilitate equitable land access:

- **Partner with the Agricultural Land Equity Task Force** under the Strategic Growth Council to design and implement farmland and ranchland programs that improve affordability and accessibility for historically underserved farmers and ranchers.
- **Expand CDFA's role in land access** by developing grant programs and technical assistance initiatives that support both new, beginning, and historically underserved producers seeking land and current landowners interested in transferring farmland or ranchland.
- **Establish a Down Payment Assistance Grant and Loan Program** to help new, beginning, and historically underserved producers acquire land. This should be done in collaboration with financial lending institutions and other state agencies. AFT in collaboration with Indiana University and Portland State University, has conducted the [Land Access Policy Incentive \(LAPI\) research project](#), which identifies effective tools such as State Beginning Farmer Tax Credits (used in Ohio and other states) that could complement such a program. AFT is also conducting ongoing research with financial experts on the effectiveness of down payment assistance and revolving loan funds.
- **Create a state-run Buy-Protect-Sell revolving loan fund**, in consultation with the Department of Conservation, that incorporates affordability mechanisms such as the Option to Purchase at Agricultural Value and the Right of First Refusal.
- **Review the September 2025 Land Access Recommendations** developed by AFT, Yolo Land Trust, and San Benito Agricultural Land Trust for the Strategic Growth Council's Agricultural Land Equity Task Force. These recommendations offer actionable strategies to expand agricultural land access across California and should inform future policy development and program design. The recommendations can be found [here](#).

We are grateful to CDFA for drafting this detailed *Climate Resilience Strategy for California Agriculture* report. These comments were drafted with input from the following individuals at AFT: Greg Plotkin, Senior Manager for Smart Solar Outreach and Engagement; Tom Stein, California Regional Director; Vanessa Lozano Perez, California Regenerative Agriculture Coordinator; Samantha Levy, Senior Policy Manager for Conservation and Energy; and Austin Kinzer, Agrivoltaics Senior Technical Specialist.

If you have any questions regarding our recommendations, please contact Chelsea Gazillo, AFT's Senior California Policy Manager at cgazillo@farmland.org or via cellphone at (707) 495-8223.

Sincerely,



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