



November 21, 2025

To: CDFA Climate Strategy Division

RE: Comments on the CDFA RSA (Resilience Strategy for Agriculture)

Dear CDFA Climate Strategy Staff,

In general, we are very supportive and excited about this CDFA Resilience Strategy for Agriculture.” From a compost and organic biofertilizer perspective, we might refer to this a “Resilience Strategy *WITH* Agriculture” since the compost/organic fertilizer industry works *with* the agriculture industry as our dominate user of our menu of composted bioproducts. Our focus of our comments on the RSA are therefore focused on Chapter 10 strategy *and* implementation. We put comments on the <http://communitydocument.com/view/rsa> document under “danwyldernoble” and this letter focuses on an approach for Chapter 10 that explicitly *includes* the California bioresources industry including compost production, as a central hub of the circular economic wheel of our primary (ag) and secondary (recycled organics) bioresources industry.

All of our comments are focused around enhancing current situation, that CDFA and farmers work ever more closely with the compost industry. The compost industry is represented in California by the Association of Compost Producers (ACP; healthysoil.org). Our members are the ones who make and deliver compost to farmers on a daily basis. **This work, which ACP initiated, must be expanded at BOTH a state level collaboration AND at the local level collaboration in order to actually *implement* this RSA.**

- **State Level:** Includes, but is not limited to: CDFA and Calrecycle: Air/climate, Water (fresh, wastewater, recycled), Solid Waste (food and landscape), CDNR: NWL, and Caltrans, (transportation) and CalFire (woody biomass management).
- **Local Level:** The collaboration with the compost industry participants at the County (58 Calif. Counties) level within their respective. local bioregions (~ 12 -24, similar to the Caltrans and/or Air Districts, but based on the each bioregional ecosystem.

The ongoing collaborative meetings has already been formed and continues to evolve and grow over the past 5 years. We contend that these are nucleation sites for collaboration that *must* be continued in perpetuity. For this reason, it should be core implementing to all the chapters of this RSA, but particularly Chapter 10 to Advance Climate-Smart and Healthy Soil Practices. Tactically that means writing into the RSA that to implement each of sections of this chapter *with/by*:

1. **State:** CDFA Healthy Soil Program management and staff working with the compost industry, starting with the “Healthy Soil Roundtable” (starting with the leadership of ACP at HealthySoil.org).



2. **Local:** CDFA supporting the formation of compost-agriculture “coalitions” in each of the California Counties are organized into defined Bioregions with compost producers already engaged in that region provide direction and action on all the relevant CDFA RSA initiatives.

Examples of these are already part of the Climate Action Planning process outlined in the RSA (pg 204). But when you look at the participants, they don't yet include the compost industry consistently.

We recommend that CDFA add this collaborative implementation vision and program to the RSA strategy. This will help to bring cities in direct collaboration for our renewable carbon, water, and nutrient integrated plans to turn the “Climate Resilience Strategy *with Agriculture*” into a thriving reality that also builds local resilient communities.

Please do not hesitate to be in touch with us.

Sincerely,
Dan



Dan Noble, Executive Director Emeritus | Lifetime Member

Association of Compost Producers

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