



November 21, 2025

California Department of Food and Agriculture
1220 N Street
Sacramento, CA 95814

Re: Public Comments on CDFA's Climate Resilience Strategy for California Agriculture (released Oct 7, 2025)

Submitted via email to climate@cdfa.ca.gov

Dear Deputy Secretary Jameson,

California FarmLink welcomes the opportunity to comment on the Department's proposed Climate Resilience Strategy for California Agriculture, released on October 7, 2025. As a Community Development Financial Institution (CDFI) that specializes in agricultural lending, as well as financial and business training for agricultural businesses across California, it is vital to our mission to support and expand lending, education, and technical assistance to underserved farming communities who have limited access to financial resources.

Creating equitable opportunities for the farmers we strive to serve to conserve natural resources and lead in climate change adaptation is a key pillar that drives our work at California FarmLink. We write today in general support of CDFA's proposed climate strategy, and are particularly supportive of: 1) the focus on equity for California's diverse farming population and the rural communities in which they reside, 2) strategies to reduce the financial risk associated with climate realities, as well as 3) expanded technical assistance for farmers on climate-smart practices and technologies that are relevant for small-scale farms.

We are providing more detailed comments below on specific strategies we believe should be prioritized, as well as additional strategies that could further strengthen CDFA's commitment to climate resilience across the state.

General Comments

Overall, we are pleased to see the inclusion of strategies that aim to address the climate concerns facing farmworkers and rural communities at large. Too often, these communities, who are the backbone of California's rural and agricultural economies, are left out of agriculture policy conversations entirely. And while we know there are many areas of jurisdiction that

govern policies that impact agricultural workers as well as rural infrastructure, there is a clear and vital role for CDFA to play in addressing the myriad of challenges facing these communities. We provide more detailed comments under Chapter 3, but will mention here that these strategies could be further strengthened to address important investments needed in climate-resilient rural infrastructure that are essential in supporting farmworkers and their families.

We also support CDFA's overarching goal to center and uplift the diversity of our state's farmers and farmworkers. California FarmLink serves a range of farmers, including a significant number of Hispanic and Latino farmers, many of whom lack access to financial resources. We understand the impact that pro-farmer, pro-equity policies and programs can have on building wealth in these underserved communities. The proof of these lofty goals, however, will ultimately reside in how these strategies are implemented. For example, how will CDFA ensure that any climate programming or policies address the specific needs of diverse farming populations, including non-English speaking, small-scale, low-wealth / limited resource, new-entry and first generation farmers, tribal, Hispanic and other farmers of color?

Finally, while we understand that generally, issues facing commercial fisheries are under the jurisdiction of the Department of Fish and Wildlife (CDFW), we believe the omission of fisheries from CDFA's climate report is a missed opportunity. In many ways, California small-scale fishing businesses, borrowers, and industry dynamics are similar to that of the agricultural sector. Fishers working in near-shore waters also face risks associated with climate and natural resources. Like many farmers, fishers also have few options for accessing fair and affordable business loans and climate-related disaster assistance. Further, this is a climate equity issue as fishers from the coastal communities of the Monterey Bay and Southern California ports are diverse in ethnicity (Latine, Sicilian, Vietnamese) and many come from multi-generational fishing families.

We appreciate the mention of how estuaries and wild fish populations are impacted by climate change, but were disappointed to see little mention of specific strategies aimed at supporting small-scale fisheries to mitigate the impacts of climate change. We encourage CDFA to coordinate with CDFW to ensure that fisheries are included in the state's final climate resilient strategy for California agriculture.

Strategy 1.1 - Financial Risk Reduction for Farmers

1. Include a Disaster Line of Credit Option

We are pleased to see financial risk reduction as the first strategy included in CDFA's report. We know that farmers across the state are on the frontline of climate change, and already seeing impacts on their livelihoods. We are supportive of the measures proposed, including CDFA investments to scale up parametric insurance options for farmers. We think it would be most

strategic to consider credit and insurance together since credit and insurance go hand in hand in supporting disaster recovery.

The concept of parametric insurance is critical because it addresses the need for rapid payment. We would like to see this concept extended to disaster-recovery credit as well in the form of a new program to offer producers access to a disaster line of credit designed to be available immediately upon the declaration of a disaster. Like a parametric insurance payment, access to a disaster line of credit would give producers cash rapidly when it is most needed to minimize additional damage and losses. Other forms of insurance and credit simply do not pay fast enough to assist with immediate post-disaster loss mitigation. Too often producers use all available cash reserves for immediate loss mitigation and even after insurance and credit payments arrive they remain short of operating cash for months and years while recovering.

A disaster line of credit would be established annually based on an operation's uninsured property and annual operating expenses. Users would be able to draw down from the disaster line of credit immediately upon a declaration of disaster in their county. A pilot program to establish a disaster line of credit could incorporate an option to assign insurance proceeds to pay down the disaster line of credit first. Similarly, the CDFA could have California Underserved and Small Producer Program (CUSP) payments assigned to pay down the disaster line of credit.

CDFA could pilot a disaster line of credit program by working with the California Infrastructure and Economic Development Bank (IBank) to make a blanket guarantee to lenders who provide disaster lines of credit to agriculture, and establishing a program with existing agricultural lending institutions, including organizations currently authorized to make FSA guaranteed loans.

Ideal terms would be zero interest for six months allowing those with adequate insurance and cash to pay off the line of credit as insurance payments are received. For others, interest could begin after six months, or they could convert the disaster line of credit into a different type of loan if that were more advantageous to the farm's recovery.

2. Explore Non-Crop Insurance Options to Address Climate-Related Loss of Markets

Many farmers impacted by climate disasters not only suffer production losses, but also market losses due to disruptions to transportation, infrastructure, and supply chains. For example, climate-related wildfires may cause local public safety officials to close down roads that farmers rely on to transport their product to markets. Under this scenario, a farmer may suffer a climate-related economic loss, even if their farm is spared by the wildfire. Loss of market access is not covered by most types of crop insurance both because there is no damage to the actual crop and because an administrative action (closure of a road) is not an insurable cause of loss.

One of the most impactful and strategic things for CDFA to explore is creating new insurance options with an emphasis on causes of loss and types of losses not well covered with current federal crop insurance programs. This could include covering direct-to-consumer farmers who suffer economic losses due to farmers' markets closing due to climate related or other disasters (i.e. global public health pandemics).

This type of insurance could operate similar to unemployment insurance, but rather than make up for lost employee wages, make up for lost business revenue, similar to the Small Business Administration's Economic Injury Disaster Loan (EIDL) and Paycheck Protection Program (PPP). The state's Quarantine Insurance Program could serve as a model for what this type of insurance might look like for farmers.

3. Explore Non-Crop Insurance Options to Address Community Relief Needs Associated with Loss of Agricultural Employment Due to Disaster

For many years we have seen that farmworker communities bear the brunt of disasters in well-insured crops like citrus. If there is a freeze in citrus, the farmers get paid from the crop insurance program but none of their workers have jobs and the communities have to find the resources to assist with basic needs like food banks and housing. Farmworker communities that are reliant on insurable crops like citrus should also receive cash infusions when events trigger large and widespread losses in the insurable crops that support the farmworker communities. A farmworker community insurance program could be tied to the federal crop insurance program to trigger payments, but the insured would be local governments, food banks, shelters and other community service providers. Producers could contribute to the fund as crop insurance riders, or through crop associations, or as a payroll tax. For many farmers this type of insurance program would simply move a charitable donation they would make after a disaster to a business expense they would pay every year, but for communities it would allow for better planning and a more rapid and efficient response.

4. Improvements to Existing Insurance and Disaster Programs

We support CDFA's secondary strategies focused on increasing access to crop insurance and disaster assistance for underserved farmers, but we would like to point out some important aspects of federal crop insurance that need to be improved to better serve California producers as they prepare for climate change. In particular we would like to see:

- a) Improvements to insurance and disaster payments for trees and other perennial crops. To date these federal programs have not worked well in California and have not been widely adopted.
- b) CUSP expanded to include other climate-related disasters farmers might face in the future, beyond just drought.

Strategy 1.3 - Invest in research and development to provide new options for building resilience on farms

5. Support Renewable Energy Projects for Small-Scale Farms, Including Solar Coolers

We are generally supportive of this strategy, in particular Action 1.3.2 “Ensure equitable deployment of technical tools and support for small and under-resourced farmers.” We would however, urge CDFA to explicitly name “outreach” as one of its “research and development” strategies. We would also urge CDFA to prioritize standing up an equipment sharing program in the near future with the funds appropriated from the 2024 Climate Bond funding.

We would also like to see more explicit support for research and development into on-farm renewable energy technologies that are accessible to and address the needs of small-scale and low-wealth farms. One example that FarmLink has been piloting successfully is the use of solar coolers to improve business viability and resilience. Solar-powered coolers enable farmers to reduce the number of miles driven for deliveries, reduce food waste, extend the sales season for less perishable crops, access new markets, and collaborate with other farmers to diversify products for sale.

CDFA could expand support for solar coolers by: 1) Exploring the potential to replicate the federal Resilient Food System Infrastructure (RFSI) program at the state level, 2) Utilizing the cooperative tool sharing program included in Proposition 4 for renewable energy projects such as shared on-farm solar coolers; and 3) Developing a strategy to re-fund the California Energy Commission Renewable Energy for Agriculture Program (REAP).

Strategy 1.4 - Strengthen local and regional food systems to build resilience

6. Address climate-related market disruptions for direct-to-consumer producers

We are in general support of this strategy, especially Action 1.4.1 “Strengthen farm-to market pathways, direct-to-consumer sales, procurement opportunities, and localized processing to reduce reliance on vulnerable supply chains”. We would however urge CDFA to include additional strategies that address the real climate-related disruptions and challenges that direct-to-consumer producers face, such as insurance options to cover climate or disaster-related marketing losses. See Recommendation 2 for more details.

Strategy 1.8 - Engage in international and subnational partnerships and collaboration

7. Include state and local partnerships, as well as global partners

In general, we are very supportive of public-private partnerships and collaborations, and have valued our partnership with CDFA over the years. However, we urge CDFA to expand the list of

partnerships to include state and local partners, as well as global partners, especially partnerships with community-based and farmer organizations, lenders, Resource Conservation Districts and other stakeholders.

Strategy 2.2 - Build new water storage capacity and maintain conveyance infrastructure

8. Ensure equitable allocations of water resources among residential, commercial, tribal, and environmental users.

As an agricultural lender, we understand that access to water for our borrowers is inextricably tied to their success in agricultural production and on-farm conservation. We also understand the specific challenges that farmers and communities in our state face related to water availability and the worsening impacts related to climate change. We are supportive of CDFA's collaborative approach outlined in Action 2.2.1 to arrive at water storage and conveyance projects that minimize conflict and maximize collaboration.

Any projects that CDFA supports or collaborates on related to increasing water availability for agriculture must ensure equitable allocations of scarce water resources between and among residential, commercial, tribal users, including small-scale farmers. FarmLink opposes any projects that threaten long-term environmental sustainability. We believe that water policy must balance the needs of agricultural production, fisheries, and watershed ecosystems. We are also supportive of programs and policies that help farmers conserve water and improve irrigation efficiency, as well as reduce nutrient leaching into ground and freshwater supplies.

Chapter 3 - Support Agricultural Workforce Well-Being and Health

We applaud CDFA for acknowledging the critical nexus between the health of communities and farmer livelihoods, paying particular attention to the importance of farmworker health and well-being to the agriculture sector. We firmly believe that essential elements of healthy communities include access to quality food and healthcare; affordable housing; child and eldercare; and educational, recreational, and social opportunities for children and elders. Since California agriculture is not separate from agricultural labor, it is essential to consider how to include agricultural labor in every aspect of climate adaptation planning as well as creating specific strategies focused on agricultural labor. For this reason, one of our important recommendations related to agricultural labor was presented with our comments on Chapter 1.

9. Partner with HCD to expand access to climate-resilient housing and infrastructure for farmworker communities

Unfortunately, the strategies outlined in the draft report are not responsive to the health and educational disparities noted in the introduction to Chapter 3. We believe that farmworkers should have access to affordable, safe, stable, and climate-resilient housing options. We

understand that rural and/or farmworker housing may not be under the sole jurisdiction of CDFA—we urge the Department to work with other agencies to ensure that affordable farmworker housing is adequately addressed in the final report. This is a fundamental quality-of-life issue that will only worsen with climate change.

For example, under Action 3.1.4., CDFA could offer grants or forgivable loans for farmers to invest in climate-resilient, farmworker housing. Climate disasters such as floods and fires, are more likely to cause greater damage to low-income housing, such as mobile homes that are not built to be climate or disaster resilient. CDFA could also meet with California’s Department of Housing and Community Development (HCD) to collaborate on investments into housing and infrastructure projects that are specific to farmworker communities that address climate disaster preparedness. For example, the State could invest in community centers in farmworker communities that would also serve as emergency shelters in the event of a climate disaster. Finally, farmworker housing could be added as an eligible project activity or prioritized within existing state programs. For example, farmland conservation projects funded by the Sustainable Agricultural Lands Conservation (SALC) program that include a plan for farmworker housing, could be prioritized. SALC has an explicit focus on equity concerns.

We would also urge Action 3.1.4. “Implement programs that build and improve infrastructure in rural agricultural communities to better support resilience to extreme weather events” to be the first action under Strategy 3.1., not the last, given the importance of infrastructure to quality of life for rural and farmworker communities.

10. Address health disparities for farmworker communities.

In addition to support for programs that provide mental health resources and training for farmworkers, as outlined in Action 3.1.3., CDFA should also include strategies that address the health disparities noted in the preamble to Chapter 3. This would include strategies that support rural clean water access, green space and recreation options, as well as investments in community health clinics, mobile health clinics, telehealth, and healthcare transportation and lodging for rural communities, including farmers, farmworkers, and their families. Again, these issues may not solely be under CDFA’s jurisdiction, but the Department should at the very least be at the table and working closely with other agencies to address these fundamental issues that will only worsen with climate change.

Action 6.3.1 Address challenges with agricultural land access

11. Include Recommendations from California’s Agricultural Land Equity Task Force

Secure, long-term access to affordable agricultural lands with stable water sources is fundamental to building a resilient food system, and is essential in order for farmers to invest in climate resilience and conservation. Farmers of color, women, and beginning farmers face

unique struggles in accessing land. Land ownership has been used to perpetuate great injustices throughout our nation's history, including to dispossess, forcibly remove, and/or prevent Indigenous and historically marginalized people from occupying, owning, and building wealth through land.

FarmLink believes that public policy must address these historic and persistent inequities by directing resources and opportunities to historically marginalized communities. We support initiatives like California's Agricultural Land Equity Task Force (LETf), which seek to address these issues. In particular, we support, and urge CDFA to include in its strategy roadmap, the following recommendations approved at the November 2025 LETf meeting¹:

- 1) Establish an Ancestral Land Return Fund;
- 2) Return publicly held land to California Native American Tribes;
- 3) Establish a Restorative Land Fund;
- 4) Fund organizations to purchase and lease or transition agricultural land to priority producers and land stewards;
- 5) Establish loan and debt forgiveness programs;
- 6) Expand tailored technical assistance for land access and acquisition;
- 7) Limit pension and investment fund ownership of agricultural land;
- 8) Improve conservation programs and tools to enable equitable land access and stewardship; and
- 9) Promote local strategies for agricultural land preservation.

Chapter 8 - Boost biodiversity on farms

12. Prioritize biodiversity strategies

In general, we are supportive of the strategies outlined under Chapter 8, and would urge CDFA to prioritize the following strategies: Strategy 8.1. "Build understanding of resources available to limit and/or reduce negative impacts to on-farm biodiversity"; Strategy 8.2 "Increase beneficial biodiversity on farms", as well as the strategy related to understanding the role of farm and ranch lands in the landscape for wildlife connectivity.

Chapter 9 - Enhance Agricultural Practices to Support Clean Air Communities

13. Invest in clean-energy, public transportation options for agricultural communities

Notably, transportation is missing from any of the strategies focused on clean air in agricultural communities. While not solely under the jurisdiction of CDFA, we would urge CDFA to work with other agencies to assess clean-energy, public transportation options that may address

¹ For more details on these proposals, please refer to the November draft LETf Report available here: <https://sgc.ca.gov/wp-content/uploads/Full-Report-ADA-FINAL-CLEAN.pdf>

automobile pollution and air quality concerns impacting farmworkers and their families, especially children, caregivers and elders in agricultural communities.

Chapter 10: Advance Climate-Smart and Healthy Soils Practices

14. Increase support for Resource Conservation Districts

We are generally supportive of the strategies included under Chapter 10 and understand the important role that soil health plays in mitigating the impacts of climate change. We would urge CDFA to include a strategy that prioritizes increased support for Resource Conservation Districts, which are a valuable local partner in providing technical assistance to farmers on conservation and soil health practices.

15. Offer Incentives to Lenders to Support with Data Collection on Climate Metrics

In regards to Strategy 10.2 “Create and standardize methodologies for measurement and tracking of soil health properties in connection with soil health practices over time” we urge CDFA to explore partnering with agricultural lenders to support this data collection. For example, California FarmLink provides conservation bridge financing to our borrowers who are enrolled in state or federal conservation programs, but are unable to provide the investments needed up front to install the required conservation practices. In partnering with CDFA, we could offer our conservation loan borrowers a reduced interest rate, if they agree to collect and share climate metrics as a result of the investments made in conservation on their farms. Additionally, the costs of financing should be included as a match towards any conservation cost-share agreement.

Action 11.1.1 - Facilitate grazing on public lands for ecological health and fuel load reduction

16. Partner with stakeholders and lenders to support regenerative grazing.

We applaud CDFA’s focus on regenerative grazing as a core pillar in their climate resilience strategy for California agriculture. Through the clients we work with, we know that over time, lack of long-term investment and ecological management of rangelands can lead to costly declines in soil health, biodiversity, and productivity—affecting landowners, lessees, and the human and wild communities that depend on these ecosystems. Through our technical assistance programs, FarmLink offers support to graziers to ensure regenerative grazing is included in agricultural lease agreements², which can often be a barrier for adoption. We support CDFA’s promotion of prescribed grazing as a key climate-smart practice that should be

² See California FarmLink’s “Guide to Regenerative Grazing Leases (2022): available here: https://cdn.prod.website-files.com/63616c9201c634982d121dc7/63b7716b24c56db860a60fa4_Guide-to-Regenerative-Grazing-Leases-Final-03.24.2022-small.pdf

promoted in more than just headwater areas, and stand ready to partner with CDFA to implement this strategy.

We would also like to include in our comments a statement of support for the comments submitted on behalf of the California Climate & Agriculture Network (CalCAN).

We thank you for your consideration of our comments, and would welcome the opportunity to provide any additional feedback, or support in implementation of any of these strategies where our expertise in providing financing, education, and technical assistance to farmers and fisheries could be of value.

Sincerely,

A handwritten signature in black ink, appearing to read "Reggie Knox", with a stylized flourish extending from the end.

Reggie Knox
CEO
California FarmLink