



November 21th, 2025

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

*Submitted electronically*

**RE: Comments on Proposed Priorities for Climate Resilience Strategy for California Agriculture**

Community Alliance with Family Farmers (CAFF) appreciates the opportunity to provide feedback on the Climate Resilience Strategy for California Agriculture (RSA). Representing more than 8,000 small and mid-size farmers, CAFF has spent over 47 years advancing family-scale agriculture and building resilient, equitable food systems across the state. We commend CDFA's leadership in developing this statewide strategy and strongly support its emphasis on climate adaptation, economic viability, and equity.

To ensure the RSA's goals translate into meaningful, on-the-ground outcomes, we recommend strengthening the strategy with clearer implementation mechanisms, dedicated funding pathways, and measurable targets across all pillars. Our aim with this submitted comment is to build on the department's goals to improve program effectiveness and technical assistance, grow partnerships, streamline policies, and advance innovation. CAFF supports the proposals outlined in the RSA's three core pillars and offers **the following recommendations to enhance their impact and ensure that small-scale, beginning, socially disadvantaged, and family farms can fully benefit from this important statewide effort.**

**Identified Gaps and Recommendations**

**1. Pillar #1: *Support a Thriving and Resilient Food Sector***

We support this pillar's emphasis on addressing economic pressures, streamlining regulatory requirements for small-scale operations, expanding small-farm insurance options and risk-management tools, and ensuring reliable water resiliency.

Below we outline identified gaps and recommendations to support a resilient food sector in Pillar #1:

### **Economic viability for small and underserved farms**

The draft acknowledges significant economic challenges—slim profit margins, rising operating costs, and climate-driven crop losses—but does not propose sufficient strategies to support resilience. Many technical tools are not small-scale appropriate, with modern ag tech being incentivized to develop tools for scale. Tech literacy for underserved and small scale farmers is only helpful if appropriate for their scale or economically feasible to use it. *We recommend **dedicated funding, accessible technical assistance, and insurance or risk-reduction tools designed specifically for small-scale** and socially disadvantaged producers as they face unique challenges in the food system but are a vital part of its resilience. We also recommend scaling up a model like the F3 Initiative, of which CAFF has had an integral role in, to increase access to capital and markets.*

### **Regulatory burden to access to programs**

While the pillar highlights increasing TA and investing in innovation, it does not address the complexity of regulatory processes or the barrier small farms face when applying for financial assistance. *We recommend the **inclusion of clear mechanisms to simplify application requirements, the availability of more multi-language application options, and improvement on agency coordination for small producers.** The agency must coordinate with local resource conservation districts and community-based organizations to ensure culturally relevant and localized outreach.*

### **Insurance and financial risk management for small and specialty crop producers:**

Expanded insurance and financial risk-reduction programs must explicitly include small farms and specialty crop producers. Given the disproportionate impacts of climate-related losses, these producers should be prioritized in the design and deployment of future insurance, relief, and disaster-assistance programs. *We recommend the agency create a dedicated grant program for technical assistance providers that support underserved farmers to access climate programs.*

### **Reliable and sustainable water access for a resilient food system:**

We are pleased to see the attention paid to both groundwater and surface water in the report. As participants in the Department of Water Resources (DWR) URCTA Program noted in 2.1.1, CAFF is actively working to support family farmers in understanding demand management actions from the Sustainable Groundwater Management Act. While the report notes the existence of this program, it does not outline how CDFA plans to interact with URCTA or other efforts to support family farmers in adapting to SGMA. *We strongly **support the goal of increasing and expanding technical assistance support** to help farmers understand water regulation and navigate compliance, and would love to see more detail on what CDFA envisions doing in this space.*

We are also pleased to see the goal of coordinating with DWR for recharge opportunities and with the Department of Conservation (DOC) on Multibenefit Land Repurposing

(MLRP). *CAFF encourages CDFA to take this a step further in coordinating with both DWR and DOC on a Small Farms Transitions Initiative **to develop strategies to support vulnerable family farmers whose production methods may need to change as a result of SGMA.***

**CAFF does not support the current proposal for new infrastructure in 2.2.2, the Delta Conveyance Project.** Family farmers in this region remain opposed to the construction of this new, highly costly project. While CAFF absolutely supports investing in water infrastructure, **we support projects that enhance local water supply** (instead of imported water) and **support efforts to fix vulnerable dams and levees**, given the many family farmers impacted by the Pajaro floods and levee damage.

### **Voluntary Carbon Markets**

The RSA proposes expanding voluntary carbon markets (VCMs) even though cited studies show they have not effectively driven soil-health adoption and often burden smaller, diversified farms. Given these limitations, it is unclear if California should prioritize VCMs or extend them to small and resource-limited producers. The strategy also notes that MMRV systems remain costly and insufficiently accurate, raising concerns about feasibility and return on investment. *We recommend a thorough reassessment of whether VCMs are an appropriate strategy for California agriculture.* CDFA should **evaluate equity impacts and consider alternative, more effective incentive models**—such as direct grants, cost-share programs, or ecosystem service payments—that better support small and diversified farms without imposing additional administrative burdens.

## **2. Pillar #2: Protect Natural Systems Critical to Agriculture**

We support this pillar's focus on expanding on-farm biodiversity, strengthening habitat conservation, and advancing climate-smart ecological practices that benefit small and large producers alike.

Below we outline identified gaps and recommendations to protect natural systems critical to agriculture in Pillar #2:

### **Boost to biodiversity on farmlands**

The draft highlights biodiversity as a core climate and ecosystem strategy but does not sufficiently address the cost and labor barriers that small and socially disadvantaged farms face when adopting these practices, nor does it sufficiently acknowledge challenges faced by growers on short-term leases or restricted access to land. Many biodiversity projects such as riparian buffers, hedgerows, and pollinator habitat, require multi-year maintenance and secure land tenure. *We recommend **streamlined incentive programs** tailored to smaller operations, strategies that support long-term stewardship such as cost-share models, improved coordination between state and federal programs, and partnerships with trusted community-based organizations.*

Additionally, there are biodiversity and ecosystem opportunities on smaller land parcels within California's thriving urban agriculture sector, which hosts thriving diversified crop and habitat systems but these operations are not referenced. *We recommend **ensuring eligibility for these production systems and small-scale farm plots for habitat incentives** that are designed with their scale and constraints in mind and support small farmers' role in unique land stewardship.*

### **Sustainable Pest Management**

The RSA highlights the need to advance Integrated Pest Management (IPM) and Sustainable Pest Management (SPM), yet it does not explicitly address the **economic barriers** small and mid-scale farms face when adopting these practices compared to conventional pest control. The strategy also overlooks key recommendations from the SPM Roadmap related to improving the economic feasibility of SPM through procurement policies, market incentives and farmer incentives to de-risk pesticide reduction.

While PCAs are mentioned, the RSA does not acknowledge the need to **update PCA training and curriculum** to reflect SPM principles. In addition, the strategy fails to connect pest management goals with existing state-funded biodiversity and soil-health practices—such as hedgerows, pollinator habitat, and compost—that directly support beneficial insects and reduce pest pressure but remain underleveraged as pest management tools. Finally, access to pest management support for small farms depends on **trusted, community-based technical assistance**, which is not clearly outlined.

We recommend ***addressing the economic barriers that farms face in adopting IPM and SPM by incorporating the SPM Roadmap's recommendations for incentives, procurement strategies, and market support***, as well as modernizing training to reflect SPM principles and diversified production systems. CDFA must also *link pest management goals to existing biodiversity and soil-health programs like HSP to improve access for small farms by **partnering with trusted, multilingual community-based technical assistance providers.***

### **Conserve productive farmland**

While we applaud CDFA's commitments to addressing farmland conservation in California and see strong alignment and support actions such as section 6.3 which highlights the importance of equitable farmland access under "Strategies & Actions", we believe there are critical gaps in this report that miss the nexus between Climate Resilience for Agriculture and a just transition in farmland.

In California, not only is development pressure a fundamental issue but we believe the influence of non-agriculture landowners such as hedge funds, pension funds and venture capital firms, poses an equal if not stronger threat to California climate resilience in agriculture. The different types of agricultural landowners have a fundamental impact on how the land is managed and impact our state's commitments to climate resilience.

Consolidated and investment-controlled ownership has real consequences for rural communities and ecosystems - they are more likely to use environmentally harmful practices,<sup>1</sup> rely on chemical pesticides and fertilizers, and overpump groundwater for irrigation-intensive crops.<sup>2</sup> *We strongly recommend the RSA include actions that not only increase land conservation and access but also **halt farmland consolidation and financialization** by incorporating the following well documented reports to address consolidation:* A) [CAFF's Land Reform Platform](#), B) [Union of Concerned Scientists Just Transition Roadmap](#), and C) the [Agricultural Land Equity Task Force's recommendations](#).

We urge the RSA's inclusion of the above reports' strong recommendations to address this critical issue, such as 1) ***Establish a first right-of-refusal program at local and state levels for Indigenous and underserved food producers. Large parcel transactions require community benefits agreements to increase local community decisionmaking opportunities, and*** 2) ***Increase the enforcement and regulation of non-farmer landowners through the adoption of farmland ownership laws that prevent the purchasing or leasing farmland by financial institutions such as pension or hedge funds.***

### 3. **Pillar #3: Encourage Resilient Agricultural Practices**

We support this pillar's focus on advancing climate-smart farming, promoting soil health, and protecting air quality for farmworkers and surrounding communities.

Below we outline identified gaps and recommendations for resilient agricultural practices in Pillar #3:

#### **Equitable access to climate-smart practices for small-scale farms**

Though the RSA emphasizes adoption of climate-smart techniques like cover crops, conservation tillage, and rotational grazing, it does not ensure that small-scale farms have equal access to these programs. *We recommend **targeted opportunities such as technical assistance, grants, and cost-sharing** designed to decrease inequity between small farms and larger operations.*

#### **Tailored soil health support and flexible funding mechanisms**

The RSA emphasizes soil health and nature-based solutions but does not address how current program structures—particularly complex eligibility requirements, documentation burdens, and shifting annual priorities—disproportionately affect small-scale, socially disadvantaged, and non-English-speaking farmers. The strategy does not reference ongoing efforts to align the Healthy Soils Program with organic transition goals, nor does it acknowledge regulatory barriers farmers may face when using compost containing animal manures, which creates additional food safety compliance for producers.

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<sup>1</sup> <https://www.thecrimson.com/article/2019/5/13/taylor-flores-jones-driver-harvards-investment/>

<sup>2</sup> <https://iopscience.iop.org/article/10.1088/1748-9326/ad0f71>

The proposed full transition of HSP to a statewide block grant model raises equity concerns, as block grants may not guarantee statewide access, sufficient technical assistance, or culturally relevant support for growers who require more hands-on assistance. Without an explicit equity assessment, this model may deepen existing barriers to participation for small and underserved producers. *We recommend the department adopt a **flexible, low-barrier soil-health funding with targeted technical assistance for small and underserved farms**; conduct an **equity review of the proposed HSP block-grant model** before full implementation; **streamline compost and food-safety guidance** to reduce burdens on growers; **strengthen links between HSP and organic-transition goals**; and **ensure program priorities explicitly support socially disadvantaged farmers and first-time applicants**.*

### **Clean air and health considerations for farm workers and communities**

Air quality programs should explicitly address the intersection of farmworker health and community exposure. The draft currently lacks specific metrics and actionable strategies to reduce exposure to dust, smoke, and agricultural chemicals for farmworkers and surrounding communities. *We recommend including **monitoring, mitigation, and incentive programs that prioritize vulnerable populations**.*

### **Equity Principles**

We strongly support the Climate Resilience Strategy's equity principles and its recognition that many California farms are small-scale and that historically underserved producers—including beginning farmers, socially disadvantaged farmers, and farmworker-led operations—play a vital role in the state's food system. However, effective implementation requires **clear metrics, explicit commitments, and accountability measures** to ensure these principles translate into real-world access and outcomes.

To strengthen alignment with the RSA's six equity principles—**financial viability; capacity building; accessibility; health and well-being; cultural relevancy; and accountability and transparency**—we recommend the RSA incorporate:

- **Explicit metrics and targets** for participation by small-scale, beginning, socially disadvantaged, and farmworker-led farms.
- **Dedicated investments in capacity building**, including culturally relevant technical assistance, multilingual resources, and peer-to-peer support models led by trusted community partners. This includes overcoming internal state regulatory hurdles as relates to translation and interpretation services to ensure consistent multilingual assistance throughout statewide programming.
- **Concrete accessibility commitments**, such as outreach in multiple languages, fee waivers, simplified or mobile-friendly application forms, and support for growers with limited digital access.

- **Tracking and public reporting** of participation by underserved producers across all incentive, grant, and regulatory programs to ensure transparency and continuous improvement.

We appreciate the opportunities for public comment provided across CDFA programs, including this report, and encourage the Department to establish a transparent process for sharing feedback and responses. This should include how input from working groups and stakeholders informs policies and program decisions. We also recommend evaluating program structures—such as the Healthy Soils and Urban Agriculture block grant models—to ensure they do not exacerbate geographic or demographic disparities in access.

### **Implementation Recommendations**

As part of CDFA's Ag Vision 2030 commitment to collaborate across state agencies and streamline regulations, we urge CDFA to embed the equity principles more directly into implementation. To meaningfully address the barriers identified throughout the RSA and ensure equitable access to incentive programs, CAFF recommends:

- **Establish a cross-agency implementation task force**, including representation from small-scale producers, socially disadvantaged farmers, and community-based organizations.
- **Develop annual public reporting on progress toward measurable equity and participation targets**, disaggregated by farm scale and producer group, and ensure transparency by improving access to feedback from public comments submitted by farmers, community organizations, and stakeholders on draft programs and policies.
- **Ensure equitable access to funding** through simplified, low-barrier application processes tailored to smaller operations and growers with limited administrative capacity.
- **Build regional coordination structures**—including partnerships with local RCDs, UC Cooperative Extension, and community-based organizations—to connect state goals with local needs.
- **Develop and improve state-level coordination across incentive programs** to ensure programs reinforce one another, reduce barriers for growers, and support long-term adoption of climate-resilient and sustainable practices. This is important to effectively address state climate goals, enhance the links between ecosystems services like healthy soils, pollinator habitats, and SPM, and increase the agronomic viability of organic transition opportunities.

### **Conclusion**

The Climate Resilience Strategy for California Agriculture rightly recognizes that the vast majority of California farms are small, family-owned operations facing rising costs, climate pressures, thin margins, and limited access to resources. To ensure the RSA delivers on its goals, CAFF urges CDFA to **explicitly prioritize these producers** by embedding clear equity

metrics, simplifying program access, expanding culturally relevant technical assistance both within the state program and through external providers, and directing targeted investments toward climate-smart practices, biodiversity, soil health, and worker and community well-being.

These actions are essential to building a resilient agricultural system that supports farmers who currently receive only 16 cents of every consumer food dollar while carrying the burden of escalating production and labor costs. Advancing food system equity and climate resilience will require coordinated, multi-stakeholder implementation, and CAFF appreciates the opportunity to contribute to this statewide strategy. We look forward to continued collaboration to ensure the Climate Resilience Strategy translates into **effective, equitable action for California's farmers and communities.**

Sincerely,



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