

**GROUP LETTER OF
SMALL FARMERS AND RANCHERS
IN THE INLAND EMPIRE**

November 7, 2025

VIA E-MAIL

Virginia Jameson
Deputy Secretary
Climate and Working Lands
California Department of Food and Agriculture

E-Mail: climate@cdfa.ca.gov

Re: Public Comments for Workshops 1&2 for the Climate Resilience Strategy for California Agriculture

Dear Virginia Jameson and staff,

We are writing as follow up to oral comments made at the Workshops held on October 22 and 28, 2025. This letter summarizes various concerns and comments shared by individuals of Small Farmers and Ranchers in the Inland Empire. Our ad hoc group of individuals represent small community agriculture enterprises. As committed farmers and ranchers, we as individuals are participating in the state's need to complete the Climate Resilience Strategy for California Agriculture along with multiple agency regulatory realignment.

Our recommendations and Implementation Steps for the Cdfa Climate Resilience Strategy for California and the need for multiple Agency Regulatory Realignment is necessary for the coordination of processes and systems across programs and agencies so that regulatory requirements are easier to understand, comply with, and administer. Regulatory alignment does not mean reducing agriculture, environmental, or human health standards. Instead, it is about making those standards work better – for the people who must comply with them, for the agencies responsible for oversight, and for members of the public.

California's food safety, water quality, air quality and climate regulations and requirements are among the most comprehensive in the nation. They reflect the State's commitment to protecting agriculture, the environment, public health, and the economic vitality of its population and enterprises.

These challenges are not limited to food safety or water quality alone. Most farmers and ranchers operate within a broader landscape of regulations across labor, air quality, land use, and market access requirements. Farmers, ranchers and partners frequently point to unmitigated concerns for the development and implementation of a comprehensive regulatory system that is more coordinated, more navigable, and more responsive to the realities of agriculture in California.

For many Inland Empire Farmers and Ranchers – especially those managing smaller, diversified, or multilingual operations – these strong protections present complexity. Navigating multiple permits, agencies, reporting timelines, and digital platforms can be a significant undertaking, especially when layered with market uncertainty, rising input costs, climate-related impacts and other emerging pressures.

Importantly, regulatory alignment does not mean reducing standards – it means delivering them in a way that is clearer, more consistent, and more connected across agencies and programs. Our position

points toward the need for integrated solutions that preserve California's strong protections while also improving how those protections are implemented and experienced on the ground.

Inland Empire Small Farmers and Ranchers are recommending multiple policy implementation steps for CDFA, CalEPA, and the Water Boards on how myriad regulations are implemented, and how administrative processes and systems could be aligned to better support small farmers and ranchers and state agencies alike.

Alignment objectives must include:

1. Evaluate federal and state requirements within the areas of food safety and water quality for the agricultural community and identify protections to public health and the environmental quality.
2. Convene with the agricultural community and regulators to review and map existing regulatory pathways for food safety, water quality, and environmental quality compliance to identify opportunities to improve efficiency and information sharing.
3. Identify and prepare implementation plans, with public input, for recommended process improvements to streamline reporting requirements.
4. Provide recommendations to CDFA, CalEPA, and the Water Boards for technological enhancements and process improvements to provide regulatory administrative and reporting efficiencies for the agricultural community

Successfully implementing multiple Small Farmers and Ranchers recommendations depends on shared data transparency and accessibility. Across nearly every solution, data governance must emerge as a central enabler of regulatory alignment. For solutions to be sustainable, they also require additional, permanent staff and technical resources, underscoring the importance of careful planning and phased implementation.

The State should continue to assess how agricultural data is governed to fully optimize the value of the information collected through its regulatory programs while also preserving regional flexibility. Whether simplifying reporting templates, sharing datasets, or creating new tools, many of the solutions require agencies to define, manage, and exchange data in consistent, secure, and transparent ways. Strengthening data governance will ensure that the State not only collects valuable information but can also use it responsibly and effectively to enhance program delivery, transparency, and outcomes.

Robust data governance is both a technical and strategic necessity for implementing Small Farmers and Ranchers recommendations. It can enable CDFA, CalEPA, the Water Boards, and other relevant agencies to collaborate more effectively with the agricultural community to uphold California's shared commitment to agriculture, environmental and public health while building regulatory programs that are more streamlined, transparent, and accessible for all.

We respectfully submit our comments on the CDFA Climate Resilience Strategy for California Agriculture and the accompanying recommendations for regulatory realignment. Further we request that CDFA proceed cautiously to adequately address and engage stakeholders so we might achieve objectives successfully.

Authors:

Paul F. Ryan, Owner/Operator
Ryan Ranch, Thelma and Louise Family Farm
Norco, CA 92860
Contact email: enviropablo@gmail.com

Lynn Summers
Summers Prep
248 East Wilson Street,
Rialto, CA 92376

Xia Langston
Amethyst Farms
8325 Etiwanda Ave
Rancho Cucamonga, CA 91739

Tim Summers
Bee's Knees
4603 Crestmore Road #9
Jurupa, CA 92509

cc: Nina Bingham, CDFA
Patrick Mitchell, CAFF-IE
Keely Cervantes, CAFF
Tommy Abeyta, Crowe
Jamey Hammond, Crowe