California Agricultural Land Equity Task Force
California Strategic Growth Council
1400 Tenth Street
Sacramento, CA 95814

Dear members of the California Agricultural Land Equity Task Force and the Strategic Growth Council Staff,

Thank you for the opportunity to submit comments on the Preliminary Draft Report and Recommendations of the Agricultural Land Equity Task Force.

We, the undersigned Land Trusts, Conservation, and Agricultural Organizations, commend the Agricultural Land Equity Task Force for the time, considerations, and expertise given in drafting this preliminary report. The recommendations prepared as part of this process will equitably advance land access opportunities for the State's tribal nations, beginning, and socially disadvantaged producers, and others interested in achieving land equity. We are honored to offer the following comments on the recommendations. Given our expertise in land protection, land access, and conservation, these comments are intended to improve the recommendations presented by the Task Force and ensure that California meets the goals and objectives set by the Task Force while ensuring that the recommendations are implemented with great success.

California's agricultural lands are at the crux of our state's economy and national food security. The price of the State's farm and ranchland continues to rise, and farmers increasingly compete with development for available land. According to the 2025 National Agricultural Statistics Service (NASS) Land Values Survey, agricultural land prices in California have increased by 2.2% since 2024 with the average price per acre being $13,700[1]. Simultaneously, the State continues to lose prime and important agricultural land. In the five years between the 2017 and 2022 NASS Agricultural Census, the state experienced a decline of 332,197 acres of agricultural land[2]. Furthermore, the number of farms fell 10.5% between 2017 and 2022, a decrease of 7,387 farms. And the pace quickened over the last two decades. The State witnessed a 23% drop in farms and decreased 7.95 million acres of agricultural land since 1982**.**

Declines in farm numbers were concentrated among the smallest operations, grouped by sales and acreage. Farms with less than 180 acres fell nearly 13% since the 2017 NASS Census, while the number of farms with less than $25,000 in sales dropped almost 17%. Meanwhile California's largest farms—those over 1000 acres or with more than $500,000 in sales—increased.[3]

The State has always been at the forefront of advancing land protection policies that will ensure agriculture continues. From passing the country's first current use law, the Williamson Act, to the

[1] https://downloads.usda.library.cornell.edu/usda-esmis/files/pn89d6567/2n49w148w/m039n441h/land0825.pdf
[2] https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1,_Chapter_1_State_Level/California/
[3] https://farmland.org/blog/2022-census-of-agriculture-california

creation of the first agricultural land trust, Marin Agricultural Land Trust. California is at the forefront of configuring policy solutions that will advance farm and ranchland protection.

Both state and private sector initiatives have influenced a broader response to curtail development pressures by establishing two Purchases of Agricultural Conservation Easement (PACE) programs including the California Farmland Conservancy Program and the Sustainable Agricultural Lands Conservation Program. These PACE programs conserve farm and ranchland with state dollars ensuring they remain available for future generations of farmers and ranchers while protecting them for the public domain. Land that is protected with state funding is subject to annual stewardship visits where landowners are required to maintain the property in accordance with the terms outlined within an easement. Often, when a landowner decides to sell their development rights, they reinvest the proceeds from the sale into their farms to sustain their operation and remain viable. These reinvestments often include but are not limited to upgrading farm infrastructure, purchasing farm equipment to implement better practices, investing in processing equipment, paying down outstanding debts, or using the funds for retirement. The need to couple easements with other farmland access tools including down payment assistance and technical assistance grants is imperative.

Regarding the existing goals outlined within the draft report, we would like to offer the following:

Goal 2: Protected and thriving agricultural lands:

2.1 Establish a statewide Agricultural Land Mitigation program
We generally agree with the recommendations presented in this section and suggest strengthening them by considering the following:

Mitigation funding is already being implemented by many local governments and utilized by land trusts to protect prime and important agricultural land. Establishing a state-level program would help streamline mitigation fund requirements across jurisdictions. For such a program to be successful, several key questions must be addressed:

- Who will oversee and determine the State's mitigation fund requirements? Will this be in addition to the mitigation fee structures already in place at the local level?
- What types of development will be subject to mitigation fee payments?
- Should certain types of development be excluded to promote agricultural land access? For example, affordable farmworker housing and similar efforts may warrant exemptions.

Additionally, we agree that a statewide plan for conserving California's most productive farm and ranchlands would be valuable, and we'd suggest that it guide not just a state agricultural mitigation program but other potential state investments in acquisitions (fee and easements) of agricultural land. We would recommend that the State dedicate staff to overseeing the plan's implementation.

2.2 Develop and fund land steward-focused conservation tools
We are supportive of many of the tools identified in this section and offer the following considerations to strengthen the recommendations:

1. **Buy-Protect-Sell is a Proven Model**
   We support the creation of a State Buy-Protect-Sell or BPS program as it would strategically leverage additional state and federal resources (e.g., USDA-NRCS, Strategic Growth Council, Department of Conservation) to proactively secure farm and ranchland before it enters the speculative market. The BPS approach safeguards agricultural land from development while increasing equitable access for the next generation of farmers, ensuring long-term viability and climate resiliency. We recommend that any BPS program includes some type of resale price restriction on the sale of the conserved land, to reduce both the initial purchase price to the farmer buyer and future land value escalation.

2. **Prioritizing Long-Term Tenure**
   We strongly support prioritizing projects that include long-term leases and/or tenure opportunities for farmers. Such models incentivize conservation practice adoption and long-term investments into farm properties.

3. **Clarifying Recommendations on Land Ownership and Control**
   We acknowledge and value the Agricultural Lands Task Force's efforts to address inequities in land ownership and management. However, we recommend clarifying the intent of recommendation 2.2(b). Without robust conservation tools, the state risks losing more agricultural lands to development, further driving up land costs and exacerbating access challenges.

4. **Strengthening Affordability Tools**
   Tools such as Rights of First Refusal and Options to Purchase at Agricultural Value (OPAV). OPAVs have been instrumental in reducing price escalation of conserved farmland in states like Vermont, New York, Massachusetts, and Maine. Other easement deed terms such as housing size limits and affirmative farming provisions have also been proven helpful in keeping protected land affordable. We agree with including these tools in the Task Force's recommendations and suggest that the State provide clear statutory authority for the use of OPAVs. We also would recommend that the State adopt an approach similar to that used by the Vermont Housing and Conservation Board (VHCB), which holds funding in reserve in the event the State needs to support a land trust that exercises an option and ensures the property transfers to a qualified producer.

5. **Expanding Technical Assistance**
   Technical assistance should be framed more broadly to support implementation of conservation plans that include sustainable agricultural practices, rather than treating practices in isolation. We recommend revising the language to read: *"Technical assistance to support the implementation of a conservation plan that includes sustainable agricultural practices."*

6. **Integrating Conservation into Community Planning**
   Finally, we recommend strengthening the role of community-based organizations (CBOs) focused on land conservation, food systems, and agriculture in local government strategic

planning processes. These processes can provide an important venue for embedding farm and ranchland conservation goals into broader community development strategies. We agree that ensuring that CBOs are at the table will help align equity, land access, and conservation objectives at the local level.

2.3 Expand and steward state-owned land suitable for agriculture

We appreciate the Task Force's recommendations in Section 2.3 and strongly support the emphasis on expanding and stewarding state-owned land for agriculture. This recommendation is aligned with AFT's *Farms Under Threat 2040* analysis, which highlights the urgent need to proactively protect California's irreplaceable agricultural lands while increasing equitable access for historically marginalized producers. We'd like to suggest the following comments to strengthen this section:

1. **Identification and Stewardship of State-Owned Farmland**
   We support directing a collaboration of DOC, CalFIRE, and the Tribal Lands Return Commission to identify State-owned Prime Farmland and Farmland of Statewide Importance, using existing DOC maps and datasets. This is consistent with AFT's *Farms Under Threat 2040* findings, which underscore the need to conserve the State's most productive and climate-resilient agricultural land.

2. **Long-Term Access Agreements for Public Lands**
   We support directing state agencies and technical assistance providers to develop model contracts for secure, long-term access to public land. We encourage the Task Force to recommend a comprehensive review of existing public land leasing frameworks to identify administrative barriers that currently make access prohibitive. Aligning lease structures with the equity principles outlined in this report would ensure that historically marginalized farmers can fully participate.

3. **Expanding State Capacity for Land Leasing**
   We support recommendations to expand the State's capacity to hold and lease agricultural land. In line with AFT's *Farms Under Threat 2040*, we encourage California to explore innovative public–private partnerships. Where the State does not have capacity to directly manage leases, we recommend establishing a program for land trusts and CBOs to serve as intermediaries. This would ensure lease terms, conservation goals, and equity outcomes are upheld.

4. **Williamson Act Improvements**
   Finally, we recommend adding a section that calls for improvements to the Williamson Act. Strengthening of this foundational agricultural land and open space conservation tool will improve both the affordability and stability of California's farm and ranchland, while also better aligning it with equity and access goals. We echo comments provided by the Community Alliance with Family Farmer (CAFF) and other stakeholders on this issue.

2.4 Incentivize and Support Local Governments to Protect and Lease Viable Agricultural Land

We recommend the following improvements to strengthen this section:

1. **Coordinate with the SALC Program efforts**
   The State should incentivize and support local governments in protecting and expanding land suitable for urban agriculture, in coordination with the Department of Conservation's SALC program. While SALC currently supports local governments in agricultural land use planning, additional emphasis is needed to ensure urban farmland and community-based agriculture are integrated into local planning efforts.

2. **Reform the Urban Agriculture Incentive Zone Act**
   Reform and strengthen the Act to encourage greater adoption by cities and counties, making the urban agriculture tax exemption more accessible, predictable, and widely used.

3. **Support Local Identification of Urban Farmland**
   Provide resources to local governments to identify vacant or underutilized parcels suitable for urban agriculture and make them available for long-term leases to priority producers and community-based organizations.

Goal 3: Equitable Land Transition and Acquisition

As the average age of a California producer is almost **60** according to the 2022 NASS Census, the need to ensure affordable and secure access to farm and ranchland for the next generation of producers is increasingly urgent. Rising land costs, coupled with an aging producer population, underscore the necessity of proactive land access and conservation programs to maintain California's agricultural viability and food security.

3.3 Establish new funding programs that are designed to serve priority producers and land stewards

We generally are very supportive of the recommendations put forward in this section. We'd like to offer the following suggestions and resources to strengthen them, as the Task Force continues to draft this report.

1. **Support Succession Planning**
   In addition to establishing a fund that offers grants to beginning and next-generation producers, we recommend that the State provide support for succession planning efforts for landowners seeking to transition their land to new farmers. These supports could take the form of grants or loans. Such a program would directly address the challenges posed by an aging producer population and the rising cost of farm and ranchland, while ensuring land transitions support both agricultural viability and equity goals.

2. **Create a Generational Land Transition Grant and Loan Program Informed by Research**
   We are very supportive of this concept. If the Strategic Growth Council moves forward with the establishment of a Generational Land Transition Grant and Loan Program, American Farmland Trust has a considerable amount of programmatic and policy expertise in supporting and advancing farm and ranchland access. In collaboration with Indiana University and Portland State University, AFT has undertaken a *Land Access*

[Policy Incentive (LAPI)] research project. This research highlights land acquisition programs and policy tools such as State Beginning Farmer Tax Credits (implemented in Ohio and other states) that can complement a grant or loan program and further expand land access opportunities. AFT would welcome the opportunity to brief the Task Force on these findings. Additionally, AFT is currently conducting research with financial experts into downpayment assistance grants and revolving loan funds on their success. We are also working to offer land owners in California workshops that provide 1:1 support to retiring farmers on their succession planning journey.

3. **Leverage State and Federal Funding Sources**
To maximize impact, the State should explore using Proposition 4 climate bond funds allocated for sustainable agricultural activities, as well as federal resources at USDA to further the recommendations in this report. Combining state and federal funding streams can help ensure farm and ranchland access programs are adequately capitalized.

4. **Establish a California Producer Pension Fund**
We support the recommendation to establish a California producer pension fund that would allow farmers and land stewards to retire without needing to sell their land to the highest bidder. Such a fund would help preserve agricultural land within farming families, provide farmers with capital to retire, support long-term land access, further the State's conservation goals, and equitable transitions to the next generation of producers. Configuring how the state will pay for this fund will be necessary for its success.

5. **Understanding of Heirs' Property Challenges Needed**
In 2021, California enacted the Uniform Partition of Heirs' Property Rights Act, extending important legal protections to heirs' property owners. Heirs' property typically refers to land passed down informally among family members—often without clear title or estate planning—which can leave it vulnerable to forced sales, legal disputes, and fragmentation. While this legislation was a critical step forward, there remains a significant gap in understanding the scope and impact of heirs' property within California's agricultural landscape.

   We recommend that the Agricultural Land Equity Task Force include a formal recommendation for the State to commission a comprehensive study to assess the extent of agricultural land held as heirs' or real property. This study should also examine the unique challenges heirs face in maintaining ownership and stewardship of fractured agricultural land. Such data is essential to inform future policy interventions that protect generational land ownership and promote equitable access to agricultural resources.

3.4 Continually evaluate and improve funding programs

In 2017, the California State Legislature passed AB 1348, the Farmer Equity Act, a landmark piece of legislation that charged the California Department of Food and Agriculture (CDFA) with addressing long-standing inequities in the state's agricultural sector. In response, CDFA established the Farmer Equity Office in 2018 to begin advancing this mission. As the Agricultural Equity Task Force and the Strategic Growth Council (SGC) move forward with implementing the recommendations outlined in this report, strategic coordination with other state agencies that share aligned goals will be essential. Such collaboration will amplify impact, streamline resources, and ultimately deliver greater support to California's diverse agricultural producers.

3.5 Support tailored technical assistance and capacity building

Regional Land Access Technical Assistance

1. **Partnering with Realtor Associations**
   Equipping realtors with agricultural land knowledge can help ensure that land is more equitably marketed and done in coordination with agricultural service providers to identify potential farmer purchasers, reducing the likelihood that prime farm and ranchland is sold exclusively on the speculative market. We recommend partnering with realtor associations to offer training courses that build basic expertise in agricultural land transactions, focusing on:
   - Understanding the unique characteristics and values of agricultural land.
   - Identifying and mitigating barriers for historically marginalized producers seeking agricultural land access.
   - Promoting land stewardship and conservation practices in the marketing and sale of agricultural properties.
   - A basic understanding of agricultural conservation easements.

2. **Expanding Capacity for Land Access Services**
   Increase the role of organizations with land access expertise in providing land-linking and technical assistance services. This should be done in coordination with the Agricultural Land Equity Task Force and guided by pre-determined criteria to ensure that services are accessible, equitable, and effective in supporting historically marginalized producers.

3. **Training for Financial Institutions to Support Equitable Land Access**
   We recommend developing training for banks, credit unions, and other financial lending institutions to help evaluate and underwrite applicants who may not meet traditional financing requirements but demonstrate strong potential as farmers or land stewards. Providing this training can help reduce barriers to agricultural land ownership and leasing, enabling a broader range of producers to access the capital needed to start or expand agricultural operations. These trainings should focus on:
   - Understanding alternative credit histories, non-traditional financial indicators, and community-based references.
   - Assessing risk in ways that expand access for historically marginalized and beginning farmers.
   - Aligning lending practices with conservation, land stewardship, and long-term agricultural viability.
   - Understanding cultural and language barriers to accessing capital.
   - Begin structuring financial program offerings that support non-traditional applicants.

Goal 4: Secure Land Tenure

4.1 Address inequitable policy consequences while respecting the intention of the law

1. **Support for Guidance and Transparency on Regulatory Impacts**
   We generally support California providing clearer guidance and increased transparency to producers regarding how state regulations may impact their operations. This includes, but is not limited to, food safety standards, land use regulations, the Sustainable Groundwater Management Act (SGMA), Irrigated Land Regulatory Program, and the State's labor laws and regulations. Clear communication, technical assistance, and accessible resources will help producers understand compliance requirements, plan effectively, and sustain productive and equitable agricultural operations across the state.

2. **Support the work of CDFA and CalEPA**
   - CDFA and CalEPA are currently working to evaluate agriculture's food safety and water quality regulatory reporting requirements, with the goal of streamlining administrative processes and improving how information is collected across the state. We recommend that the Agricultural Land Equity Task Force actively coordinate with these agencies to ensure that equity considerations are integrated into this effort. By offering input on how these regulatory processes impact historically marginalized producers, the Task Force can help shape a more inclusive and accessible agricultural system.

4.2 Direct, incentivize, and support local governments to adopt zoning and land use planning practices that facilitate secure land tenure and stewardship

1. **Smart Growth and Planning for the Future of Agriculture**
   We support the integration of Smart Growth principles into state and local planning to protect agricultural land, guide responsible development, and ensure long-term viability of farming in California. Smart Growth strategies that prioritize compact development, conservation of prime farmland, and support for sustainable agricultural operations can help meet both climate and food security goals while preserving the State's agricultural heritage. This will also ensure that more farm and ranchlands remain available for future generations including historically marginalized producers.

   To help California's local governments meet Smart Growth goals, we recommend increasing funding for the Sustainable Agricultural Lands Conservation (SALC) Program. SALC provides critical grants to support the development of comprehensive local plans and strategies that safeguard the state's agricultural lands. By investing in projects such as agricultural land mapping, local food system planning, and the integration of farm and ranchland protection into General Plans and Climate Action Plans, SALC strengthens climate resilience, promotes sustainable development, and ensures that agricultural lands remain viable for future generations.

We are grateful to the Agricultural Land Equity Task Force for acknowledging the historical discriminatory measures that have contributed to inequities in land ownership and tenure opportunities within California. If you have any questions regarding our recommendations, please contact Chelsea Gazillo, Senior California Policy Manager, American Farmland Trust, at cgazillo@farmland.org.

Sincerely,

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