



CALIFORNIA DEPARTMENT OF
FOOD & AGRICULTURE

Karen Ross, Secretary

May 12, 2017

Office of the Hearing Clerk
United States Department of Agriculture
1400 Independence Ave., SW
Stop 9203, Room 1031, South Building
Washington, DC 20250-9203

Subject: Federal Register / Vol. 82, No. 29 / Tuesday, February 14, 2017 /
Proposed Rules Page 10634
DEPARTMENT OF AGRICULTURE Agricultural Marketing Service
Doc. No. AO-15-0071; AMS-DA-14-0095;
Milk in California; Recommended Decision and Opportunity to File Written Exceptions
on Proposal To Establish a Federal Milk Marketing Order

Dear Sir/Madam:

CDFA has reviewed the Recommended Decision released by USDA proposing the establishment of a Federal Order (CA FMMO) to regulate the handling of milk in California. The recommended decision found that the quota program should remain entirely within the jurisdiction of CDFA, operate as a stand-alone program and that its proper recognition under the proposed CA FMMO would be through an authorized deduction from payments due to producers.

In response to the USDA's recommendation and input from California milk producers, CDFA is ready and willing to establish a stand-alone, producer funded quota program. However, to ensure a stand-alone quota program is not disrupted, it is necessary to remove any statutory ambiguity that may exist in California's statutes. Therefore, it is the CDFA's intention to sponsor legislation to ensure the proper authority lies with the department, convene the Producer Review Board (Board), pursuant to FAC section 62719, develop the necessary details for a stand-alone quota program, and hold a producer referendum on the Board's recommendations. The CDFA's goal is that all of this should happen prior to the CA FMMO producer referendum.

In addition, we would call attention to the in-house expertise the CDFA has on staff and their long-standing relationships with members of the dairy industry and would urge USDA to utilize this expertise if a CA FMMO is approved by producers. We believe this would lead to a more efficient administration of the program for all parties.

Yours truly,

Karen Ross
Secretary

