



CALIFORNIA DEPARTMENT OF
FOOD & AGRICULTURE

Karen Ross, Secretary

July 23, 2018

Mr. David Hancock
NASS Clearance Officer
U.S. Department of Agriculture, Room 5336
South Building, 1400 Independence Ave., S.W.
Washington, DC 20250-2024

RE: OMB Control Number: 0535-0093

Dear Mr. Hancock:

In response to the Federal Register 0535–0093 request for public comments, the California Department of Food and Agriculture (CDFA) would like to express its support of California's floriculture and nursery industries and express its wholehearted support of NASS reinstating the Floriculture and Commercial Horticulture Survey and its intent to seek approval to revise and extend information collection for three additional years.

The California floriculture industry is California's fourth leading commodity with average, cash returns of over \$3.5 billion annually for crop years 2011-2015 and accounted for 20 percent of U.S. sales of nursery and floral products¹. The NASS Floriculture and Commercial Horticulture Survey plays an integral role in this success. We offer the following responses in support of reinstatement of this survey:

1. Whether proposed collection will have practical utility:

This Report is the only one of its kind comprehensive enough to document total floriculture and commercial nursery production. It provides essential market information to facilitate informed production and marketing decisions. The Report also provides information regarding the impact of recent and future weather events on the California cut flower industry.

¹ California's Nursery and Cannabis Industries Report



2. Whether the agency's estimate of the total annual burden of 4,700 hours (between 10 and 60 minutes per respondent) of the proposed collection of information to, estimated 7,600, farms and businesses is accurate.

The more efficient the survey, the better reporting that results. The estimated burden of time required for each respondent to provide the necessary information is reasonably accurate.

3. Ways to minimize the burden of the collection of information on those who are to respond, through the use of appropriate automated, electronic, mechanical, technological, or other forms of information technology collection techniques.

We suggest this process of survey completion also include an automated population of data using the prior year's entries of routine survey responses, thus minimizing the burden to complete the survey while increasing the accuracy of survey responses.

4. Whether the methodology and assumptions used to enhance the quality, utility and clarity of the information to be collected on respondents is valid, this includes:

- Operations with less than \$100,000 in sales of floriculture products, respond to a reduced number of questions related to operation characteristics.
- Operations with sales greater than \$100,000 complete the entire questionnaire.

Except those operations residing in Hawaii where,

- Operations with sales of at least \$10,000 will complete the full questionnaire.

We suggest this process and corresponding values be carefully considered as size of operation does not always represent the diversity of an operation.


We also suggest that reporting procedures be evaluated regarding consistency with other reporting entities such as the County Agricultural Commissioner reports and data collected by the California Department of

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Food and Agriculture, thereby providing additional checks and balances, an increased response rate due to a lower reporting burden, and improved data accuracy.

We appreciate your consideration of reinstating this NASS Floriculture and Commercial Horticulture Survey and appreciate this opportunity to submit comments on behalf of the California Department of Food and Agriculture.

Yours Truly,



Jeff Cesca, Director
Division of Marketing Services

cc: Karen Ross, Secretary of Agriculture
California Department of Food and Agriculture

Chris Messer, Director
NASS California Field Office