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May 20, 2019

Mr. Barry F. Mardock
Deputy Director
Office of Regulatory Policy
Farm Credit Administration
1501 Farm Credit Drive
McLean, VA 22102-5090

RE: Advance Notice of Proposed Rulemaking – Young, Beginning, and Small Farmers and Ranchers – RIN 3052-AD32 / Federal Register 84, No. 35 (February 21, 2019).

Dear Mr. Mardock,

Yosemite Farm Credit, ACA (Yosemite) appreciates the opportunity to comment on the Farm Credit Administration's (FCA) Advanced Notice of Proposed Rule Making published in the February 21, 2019 Federal Register (Advance Notice) addressing issues associated with the collection and reporting of data from the Farm Credit System (FCS or System) with respect to service to young, beginning, and small (YBS) farmers, ranchers, and producers or harvesters of aquatic products (YBS farmers). We are also supportive of and endorse the comments being submitted by the Farm Credit Council (FCC). Our positions are aligned and we urge FCA's full consideration of the FCC's comments in addition to the comments expressed by Yosemite in this letter.

General Comments by Yosemite Farm Credit

Yosemite Farm Credit has a long-standing and continuing commitment to serve all credit worthy farmers and ranchers in our lending territory. Yosemite also cooperates with other agricultural organizations and trade associations in numerous programs at the national, district and local level that encourage and educate YBS farmers. At Yosemite, we strongly support reporting current, accurate, and meaningful information regarding its YBS lending activities. We believe that the current categories of reporting are meaningful and consistent with the Farm Credit Act. We also believe that the current regulatory requirements are sufficient. The focus, as stated in the Farm Credit Act, should be on progress toward program objectives and the goals developed in accordance with existing FCA regulations. We believe that any attempt to increase precision will only divert from the need to emphasize qualitative information and achievement of YBS goals. From our perspective, the current regulatory framework and reporting instructions provide meaningful information when combined with the qualitative supplemental information.

Conclusion

Yosemite Farm Credit supports a strong, proactive program to serve YBS farmers. We are proud of our commitment to these farmers as demonstrated consistently on both qualitative as well as quantitative grounds. As we review both the questions in this ANPRM, as well as our responses, we are unaware of any need to make further regulatory changes. The definitions and reporting requirements are included in FCA's Bookletter (BL-040 Revised). That guidance remains as a flexible way to address any changes in reporting requirements and can be updated as necessary.

We thank you for the opportunity to comment and trust that our comments, as well as those submitted by System institutions, will assist the Agency. If you have any questions, please do not hesitate to contact me.

Sincerely,


Leonard Van Elderen
President and CEO