



National Association of State Departments of Agriculture
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July 25, 2024

William Hohenstein
Director, Office of Energy and Environmental Policy
U.S. Department of Agriculture
1400 Independence Ave. S.W.
Washington, D.C. 20250

Re: Procedures for Quantification, Reporting, and Verification of Greenhouse Gas Emissions Associated with the Production of Domestic Agricultural Commodities Used as Biofuel Feedstocks (Docket No. USDA-2024-0003)

Dear Director Hohenstein,

NASDA appreciates the opportunity to respond to the U.S. Department of Agriculture's (USDA) request for comments on "Procedures for Quantification, Reporting, and Verification of Greenhouse Gas Emissions Associated with the Production of Domestic Agricultural Commodities Used as Biofuel Feedstocks".

NASDA represents the commissioners, secretaries, and directors of the state departments of agriculture in all 50 states and 4 U.S. territories. State departments of agriculture are responsible for a wide range of programs, with conservation and environmental protection among their chief responsibilities. NASDA is also a steering member of the Food and Agriculture Climate Alliance (FACA), founded in 2020 to ensure that stakeholders across the agriculture and forestry value chain have a seat at the table in federal climate policy discussions. NASDA supports the recommendations and comments related to this request for information filed by FACA.

State departments of agriculture are unified in their support of voluntary, incentive-based climate-smart agriculture practices. Most farmers and ranchers are already using climate-smart strategies to reduce emissions, sequester carbon and improve resiliency. Identifying the benefits of climate-smart agricultural practices that sequester carbon within the production process of biofuel feedstocks will prove beneficial for the broader adoption of these practices; however, the USDA must thoroughly acknowledge the diversity of carbon sequestration methods before any form of program implementation. Quantification systems must account for the variance in these sequestration methods, farm size, crop types, and soil topography to eliminate any form of bias. This will ultimately build a system based on equity for all farmers and ranchers.

USDA must also avoid unnecessary burdens to farmers and ranchers when implementing voluntary evaluation programs. Data collection efforts must remain confidential, efficient, and user-friendly for producers who voluntarily engage in these efforts. In addition, any quantification or verification initiative must be conducted in a non-partisan manner by individuals with experience in farming and a strong understanding of climate-smart agriculture practices.

NASDA supports a greater role for states in implementing and enforcing any climate programs developed and implemented by USDA. State departments of agriculture serve as ideal partners for leading policy development and convening industry perspectives on resource, conservation, and climate programs in individual states. If the USDA Program is to be successful, policies must be developed and informed by trusted, non-partisan individuals with experience in farming, a deep understanding of conservation programs, and a demonstrated ability to work with all levels of government. NASDA members serve as co-regulators with federal agencies on conservation, environmental protection, and the promotion of economic sustainability of agricultural producers, and have a long history of demonstrating the strength of cooperative federalism.

NASDA applauds USDA for its continued efforts to ensure a collaborative approach in quantifying GHG emissions associated with climate-smart agricultural practices, particularly within the area of biofuels. Cooperation with state departments of agriculture to identify ideal verification, quantification, and reporting practices will strengthen potential programming and incentives that accommodate the diversity within climate-smart agriculture across the nation. In addition, standardized methods across multiple federal agencies will prove necessary for all GHG programs that integrate biofuels. We look forward to continued collaboration and outreach as further initiatives develop.

Sincerely,

A handwritten signature in black ink, reading "Ted a McKinney". The signature is written in a cursive style with a large, sweeping loop at the end.

Ted McKinney
Chief Executive Officer
NASDA