

July 25, 2024

William Hohenstein  
Director, Office of Energy and Environmental Policy  
Office of the Chief Economist  
US Department of Agriculture  
1400 Independence Avenue, SW  
Washington, DC 20250

Dear Director Hohenstein:

Thank you for the opportunity to comment on the request for information on the 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). We represent the grower associations of several commodities grown in the U.S. and appreciate the opportunity to provide feedback to USDA on climate smart feedstocks for biofuels.

As USDA continues to support agriculture producers in expanding new market opportunities, we want to highlight that our members are not producing a single crop, but are producing a variety of feed, fiber, food, and fuel crops through crop rotations on the same land. Each of these crops have unique market demands, processing requirements and different supply chain programs that may focus on environmental attributes, grading, quality, or variety traits. Growers are managing their operations to produce healthy crops, protect natural resources and maintain viable farming operations today and into the future. Working with local, state, and regional guidance from ag retailers, crop advisers, universities, USDA, and others, they develop rotations that work for their soils, climate and markets.

The potential for expansion of biofuels markets is an exciting opportunity for many growers of both crop and residue feedstocks. We are encouraged that USDA is actively working to facilitate those market opportunities. USDA should also be considering the successful crop rotations that growers are using, and the benefits provided by diverse crop rotations. We request that USDA include crop rotation in the list of climate smart practices for biofuel feedstocks (Question 2). USDA must continue to recognize the importance of rotations that provide a variety of ecosystem benefits, including sequestering carbon, breaking pest cycles, improving soil health and water quality, reducing erosion, and for winter crops, keeping a living

root in the ground over winter. Crop rotations also provide growers with a diverse revenue stream from different commodities and end users of those crops for feed, fiber, food, and fuel.

Thank you for the opportunity to provide comments and we look forward to continuing to work with you on these important issues.

Sincerely,

American Soybean Association

National Association of Wheat Growers

National Barley Growers Association

National Corn Growers Association

National Cotton Council

National Sunflower Association

USA Dry Pea & Lentil Council