



August 11, 2023

Dr. Seth Meyer  
Office of the Chief Economist  
1400 Independence Ave SW  
Washington, D.C. 20250

**Re: Docket No. USDA-2023-0009**

Dear Dr. Meyer,

The Food and Agriculture Climate Alliance (FACA) appreciates the opportunity to offer comments to the U.S. Department of Agriculture (USDA) Request for Information on the [Federal Strategy To Advance Greenhouse Gas Emissions Measurement and Monitoring for the Agriculture and Forest Sectors](#) (the Strategy), which was published on July 12 in the Federal Register.

FACA was founded in 2020 to ensure that stakeholders across the agriculture and forestry value chain had a seat at the table in federal climate policy discussions. Today, FACA has over 80 members representing farmers, ranchers, forest owners, agribusinesses, manufacturers, the food and innovation sector, state governments, sportsmen and sportswomen, and environmental advocates. Our members are united in support of federal climate policies that:

1. Are voluntary, market- and incentive-based.
2. Advance science-based outcomes.
3. Promote resilience and help rural economies better adapt to climate change.
4. Ensure equitable opportunities for all farmers, ranchers, and forest owners, including historically underserved and small producers.
5. Are strongly bipartisan.

For a list of FACA members, please visit [www.agclimatealliance.com](http://www.agclimatealliance.com).

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The Food and Agriculture Climate Alliance (FACA) commends the Department for taking steps to identify and address gaps in current greenhouse gas (GHG) emissions measurement and monitoring capabilities. Further, we greatly appreciate that several of our policy priorities, including operationalizing a national soil carbon monitoring network and developing a forest carbon decision support system, are proposed as near-term projects in the Strategy.

Improving the accuracy and timeliness of U.S. GHG estimates will help enhance confidence in the GHG benefits of voluntary climate-smart production practices and ensure that U.S. producers have accurate decision-making tools.

As USDA and the Greenhouse Gas Monitoring & Measuring Interagency Working Group work to advance measurement, monitoring, reporting, and verification (MMRV) in the agriculture and forest sectors, FACA recommends the following:

**1. Ensure Data Collected Reflects a Diversity of Cropping Systems and Climate-Smart Practices and Processes**

As part of USDA's data collection efforts, FACA encourages continued periodic funding for surveying crop production practices, such as nutrient management, which will be key to reducing impacts to climate and water. USDA should also ensure that data collected from a variety of sources, including surveys, capture newer innovations such as the use of animal feed additives and applications of biologicals.

Information related to the planting of cover crops should also be added to the National Agricultural Statistics Service (NASS) Prospective Plantings survey. Data related to acres and types of cover crops planted last season, and intention to plant cover crops next season would help producers and the seed industry to plan ahead to ensure the availability of high-quality cover crop varieties at the right place and the right time.

In addition, USDA's proposed GHG research networks should prioritize quantifying the potential contributions to net positive impacts on climate mitigation of biotechnology, pesticides (both organic and conventional), biologicals, mechanical solutions, and data solutions when used in combination with tillage management, integrated pest management, and other conservation practices.

**2. Ensure Robust Standards for Data Collection and Governance**

FACA encourages the Department to balance data needs with producer constraints. Data collection, particularly at the field scale, must remain voluntary and maintain high protections for producer privacy. Further, adding additional reporting or data submission requirements to current



conservation or climate programs could deter small and/or historically underserved producers' participation or enrollment.

To facilitate producer awareness and engagement around data, FACA recommends the establishment of an advisory committee focused on data collection and data governance. Participation should include farmers, ranchers, forest owners, including small and underserved producers, government and university soil scientists, data scientists, private sector project developers, and agronomists. Updating conservation activity data must be a collaborative effort that prioritizes the needs of U.S. producers.

### **3. Leverage Data from Non-Federal Entities**

FACA encourages the Department to leverage data from non-Federal sources where appropriate. This includes existing data sources from state departments of agriculture, nongovernmental organizations, local development organizations, and industry, including ag retailers and cooperatives. Many of these sources are working with producers to achieve GHG reductions and have significant data pools. Leveraging these sources would improve collaboration and reduce duplication of non-federal activities. The Department should prioritize collecting existing data from non-federal sources to achieve expedited results.

### **4. Ensure the Soil Carbon Monitoring Network Prioritizes Resampling and Reflects a Diversity of Cropping Systems**

FACA is pleased that the Department has plans to establish a national soil carbon monitoring network to monitor soil carbon changes over time and assess the impact of climate-smart practices on carbon sequestration. Similar networks already exist in many countries, including the European Union, New Zealand, China, and Australia.

The U.S. network should cover sites across the country that reflect different landscapes, soil types, and cropping systems. To ensure that soil carbon stocks can be monitored over time, the USDA protocols should include resampling requirements and guidelines. In-depth data on soil carbon stocks, density and sequestration, and GHG flux measurements should be captured spatially and temporally at selected monitoring (benchmark) sites.

FACA also supports USDA's demonstration project to identify accurate, low-cost soil carbon measurement strategies to be deployed in the national soil carbon monitoring network. USDA should consider the integration of a multi-sensor automated digital soil coring technology coupled with modern data analysis tools and soil carbon modeling.



## **5. Assess and Improve Decision-Support Tools**

FACA supports investing in new or improved tools to support producers in conservation planning and decision-making. This includes the prioritization of a national forest carbon decision support system.

As part of USDA's evaluation of existing models and tools, FACA recommends the Department conduct an end user assessment report of the Carbon Management & Emission Tool (COMET). The report should: determine if improvements would be needed to align with GHG protocols for a diversity of users; provide clarity around scope of COMET for a diversity of crops, production systems, and both production and conservation practices; and determine if key stakeholders representing a diversity of crops and cropping systems have access and can utilize its results.

## **6. Consider Quantification of GHG Avoidance Strategies**

FACA encourages USDA to consider a systems approach towards GHG quantification. For example, USDA should consider opportunities to quantify the methane avoidance associated with tools and technologies that reduce food loss, such as plant breeding and biotechnology. These tools can prevent spoilage, extend shelf life, and increase resilience, which all contribute to less wasted products being sent to the landfill. Similarly, USDA should consider the role of animal rendering in reducing landfill waste and quantify associated methane emissions avoidance.

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In conclusion, FACA appreciates USDA's efforts to improve emissions accounting and reporting in the agricultural and forest sectors. Our members are committed to advancing voluntary and science-based climate solutions; improvements to decision-support tools and GHG estimates will help our sectors further deploy effective mitigation strategies and demonstrate progress on a global scale.

We thank you for your leadership and look forward to working together to ensure that implementation of this Strategy recognizes the diversity and breadth of agricultural and forestry production systems.

Sincerely,

The Food and Agriculture Climate Alliance