



April 29, 2021

Seth Meyer
Office of the Chief Economist
U.S. Department of Agriculture
Whitten Federal Building
1400 Independence Ave SW
Washington, DC 20250

RE: Comments on the “Executive Order on Tackling the Climate Crisis at Home and Abroad” [Docket ID No. USDA-2021-0003-0001]

Dear Mr. Meyer,

National Sorghum Producers (NSP) would like to thank you for the opportunity to contribute comments on the Executive Order on Tackling the Climate Crisis at Home and Abroad.

NSP is an agricultural commodity organization that represents sorghum farmers nationwide on regulatory and legislative issues. Serving as the voice of the sorghum industry, NSP represents sorghum farmers on a variety of issues. With renewed and expanded interests from U.S. farmers in sorghum production as well as new and expanding markets, NSP continues to advocate for policy and regulatory approaches that allow sorghum farmers to continue to farm sustainably and to innovate to increase their role in ecosystem services, while maximizing sorghum’s naturally sustainable attributes to continue to supply abundant, safe, high quality food, fiber and renewable fuels.

The sorghum industry is made up of 40,000 sorghum farmers and has a presence in almost every state in the continental U.S with nearly 7 million acres of grain sorghum expected to be planted in 2021. Kansas and Texas lead the nation in sorghum production, while areas like the Northern Plains, the Mississippi Delta and the Eastern Seaboard are experiencing nominal acreage growth. Sorghum is a water-sipping crop with an environmental footprint smaller than many similar crops, using a third less water than corn, for example.

In fact, sorghum farmers are already on the front lines, mitigating and responding to the impacts of climate change while adapting and innovating to keep the lands they steward productive now and for future generations.

Sorghum Sustains by:

- Reducing greenhouse gas emissions and sequestering carbon. With its dense and robust root structure, sorghum translocates carbon deeper into soils.
- Through breeding innovations, sorghum farmers have successfully adopted no-till or minimum-till practices on approximately 75% of sorghum acres – meaning the sorghum associated carbon is sequestered for longer and deeper than in most cropping systems.

- Sorghum also plays a significant role in domestic biofuel markets, which according to EPA resulted in reduced GHG emissions equivalent to removing 17 million cars from the road in one year alone.
- Sorghum is a water smart, climate resilient crop, and with the necessary resources to innovate and the incentives to bring those innovations to the market, we can accomplish more.

As you evaluate our responses to the questions outlined in the Federal Register notice and decisions are being made, NSP welcomes the opportunity to expand on our comments further and to be a resource for you. We encourage decision-makers to be open to an array of solutions that reflect the diversity of U.S. agriculture and cropping systems that together address climate challenges along with the most important goal of modern agriculture — meeting the food and fiber needs of a growing world.

Sincerely,



Kody Carson, Chairman
National Sorghum Producers

1. Climate-Smart Agriculture and Forestry Questions

A. How should USDA utilize programs, funding and financing capacities, and other authorities, to encourage the voluntary adoption of climate-smart agricultural and forestry practices on working farms, ranches, and forest lands?

- There needs to be a dual focus on both direct payments for the implementation of sustainable practices that carry a “public service” benefit, as well as the strong expectation that companies and the private sector pass along value captured to farmers of sustainably-produced products.

1. How can USDA leverage existing policies and programs to encourage voluntary adoption of agricultural practices that sequester carbon, reduce greenhouse gas emissions, and ensure resiliency to climate change?

- Existing NRCS programs should be used alongside any new programs without displacing much needed funding for current conservation program purposes. Considerations for existing programs should especially include those promoting resource-conserving crop rotations that, according to the NRCS Waiver to Utilize the revised Definition for Resource-Conserving Crop Rotation (RCC), include any high residue crop that “...efficiently uses soil moisture, reduces irrigation water needs, or is considered drought tolerant.”
- Programs include but are not limited to EQIP, CSP, CRP and RCPP which should continue to be used to incentivize farmers to conserve resources by using crops like sorghum to reduce wind, water and nutrient erosion as well as lower irrigation water requirements.
- Encourage partnerships/relationships with agriculture-adjacent groups such as Pheasants Forever and Quail Forever to facilitate the process of program participation.
- Identify key players in strategic areas to serve as conduits for services and support.

- Programs should encourage incentives for working lands practices vis-a-vis traditional set-aside practices such as CRP. While beneficial in many instances, programs such as CRP can unfairly penalize young and beginning farmers and have lasting negative economic impacts on rural communities. Undoubtedly, some farmland should be in permanent grass. However, there are many areas with land that could be farmed, and working lands programs often drive environmental outcomes that are just as positive as those associated with CRP at less cost.
- Eligibility to participate in existing programs must not be based on performance or adoption of practices in sustainability programs.

2. What new strategies should USDA explore to encourage voluntary adoption of climate-smart agriculture and forestry practices?

- Program incentives should not be based on performance but rather on adoption of a suite of sustainability practices. A host of environmental stressors beyond farmers' can lower productivity in any given year, making high performance in those environmentally challenging years almost impossible.
- Quantification of overall "societal value" of ecosystem services generated by farmers. While carbon is important, nitrogen emissions comprise 80 percent of farming sector emissions in certain greenhouse gas models. For this reason, nitrate emissions mitigation should also be considered. Conserving water is also a key public service, and given sorghum uses up to one-third less water than corn, its farmers should be recognized for the valuable service they provide in protecting this valuable resource.
- Identification of a broadly accepted "suite" of practices that growers can access and implement based on their farm characteristics to maximize their sustainability. Special emphasis must be placed on the specific needs of the region in question. For example, many farmers practice what can best be described as 'strategic tillage' in geographies where excess moisture, compaction or freeze-thaw cycles reduce productivity. Such practices are often ideal from a sustainability perspective, and this should be recognized by USDA.
- Alternative definitions of "cover crop" must be explored. In certain areas, cover crops are employed in a different manner than in other areas. For example, wheat residue is for practical purposes used as a cover crop in the High Plains. While this may not warrant an actual change in the definition of "cover crop," farmers using stover from high residue grass crops as cover should be accommodated for employing this best practice.

B. How can partners and stakeholders, including State, local and Tribal governments and the private sector, work with USDA in advancing climate-smart agricultural and forestry practices?

- Via the expansion of supply chain-focused pay-for-practice programs that link private companies to farmers around sustainable practices, and these practices should be region-specific. For example, partners in areas experiencing irrigation water declines should be engaged in a way that promotes water-sipping crops like sorghum.
- Through the support of further development and growth of a traceability infrastructure - particularly in commodity markets - to allow for the directly track the value of crops produced via sustainable, climate-smart practices.

C. How can USDA help support emerging markets for carbon and greenhouse gases where agriculture and forestry can supply carbon benefits?

- Through the creation and oversight of standard protocols and accepted measurement practices. The current situation in which these expectations are not standardized creates significant confusion and uncertainty on the part of farmers, as well as making it challenging to navigate the available opportunities in the carbon space.
- Furthermore, the full range of ecosystem services should be considered. Greenhouse gas models offer important insight into the sustainability of various farm practices, but many do not properly account for environmental stressors such as nitrate emissions or excessive irrigation water usage in sensitive areas such as the High Plains.
- USDA must also account for abatement. For example, farmers in different regions will sequester different amounts of carbon. However, this fact does not necessarily make farmers who sequester less any less sustainable. Given nitrates are 298 times as potent as carbon dioxide in terms of global warming potential, farmers who cannot sequester carbon but employ practices that allow them to mitigate nitrate emissions may actually be more sustainable. Any models ought to take this into account.

D. What data, tools, and research are needed for USDA to effectively carry out climate-smart agriculture and forestry strategies?

- Increased research on the impacts of cover cropping in dryland, semi-arid growing environments, including to what extent cover crops are appropriate in specific scenarios based on geographic location, rainfall, cropping systems, etc.
- Usage of alternative definitions of “cover crop” in certain areas (i.e., areas already mentioned where the stover from high residue grass crops such as wheat are effectively used as cover).
- Increased information on practices other than those aimed at increasing carbon sequestration. For example, practices that minimize nitrate runoff and other forms of runoff should be considered.
- Research into the benefits of livestock integration into cropping systems. A large portion of U.S. sorghum farmers integrate livestock using sorghum residue as high-quality fodder, and this practice must be rewarded. Furthermore, U.S. livestock producers are global leaders in sustainability, and U.S. policy should reward this reality and U.S. livestock farmers’ global leadership.

E. How can USDA encourage the voluntary adoption of climate-smart agricultural and forestry practices in an efficient way, where the benefits accrue to producers?

- Facilitation of market-connection opportunities for further diversification of farming practices (including more diverse cropping systems and small-scale livestock integration), particularly in those production areas where direct market connections or diversification is less common.
- USDA must reward early adopters in any climate-smart agricultural and forestry policy frameworks. Over 75 percent of sorghum farmers employ some form of conservation tillage, and this has been the norm in much of the Sorghum Belt for decades. These practices have translated to real change in rural communities across the High Plains, so these positive outcomes must be rewarded rather than punished (as would be the case if only practices going forward were rewarded).
- Regionality must also be recognized in voluntary programs as should alternative definitions of certain practices such as cover cropping in regions where using stover from high residue grass crops as a cover is a best practice.

2. Biofuels, Wood and Other Bioproducts, and Renewable Energy Questions

A. How should USDA utilize programs, funding and financing capacities, and other authorities to encourage greater use of biofuels for transportation, sustainable bioproducts (including wood products), and renewable energy?

- USDA should fully utilize its authorities under Title IX of the farm bill to support projects aimed at pulling sustainable farming practices such as conservation tillage through ethanol plants. USDA loan guarantees and grant programs operated through Rural Development should be used to fund projects aimed at enhancing greenhouse gas emissions reductions of biofuels by incorporating advanced biofuel feedstocks like sorghum.

B. How can incorporating climate-smart agriculture and forestry into biofuel and bioproducts feedstock production systems support rural economies and green jobs?

- Biofuels already play a key role in rural economies - both for biomass farmers as well as for employees of the bioenergy production facilities. Up to one-third of sorghum annually can be used to produce ethanol in the U.S., and rural communities across the Sorghum Belt have benefited from this industry.
- Climate-smart agriculture has the potential of making biofuels increasingly more sustainable from both a carbon sequestration and overall environmental stressor abatement perspective. It can do so by supporting soil health and related practices that sequester carbon and minimize nutrient runoff but also by reducing irrigation water usage. This means additional per bushel value to farmers.

C. How can USDA support adoption and production of other renewable energy technologies in rural America, such as renewable natural gas from livestock, biomass power, solar, and wind?

- USDA should focus on annual crops with strong genetic backgrounds and institutional support (i.e., and established seed production supply chain) for biomass power applications. Given its genetic diversity and potential for producing large amounts of biomass, sorghum can produce biomass for biopower in a very sustainable manner.

4. Environmental Justice and Disadvantaged Communities Questions

A. How can USDA ensure that programs, funding and financing capacities, and other authorities used to advance climate-smart agriculture and forestry practices are available to all landowners, producers, and communities?

- Sociological studies should be conducted (if not already available) to fully examine key similarities and differences between farmers of different regions, ethnicities and socioeconomic groups to help identify common pinch points through outreach and by providing technical assistance.
- USDA must also ensure that the benefits of sustainable agricultural practices also accrue to the health and wellbeing of both urban and rural communities.

B. How can USDA provide technical assistance, outreach, and other assistance necessary to ensure that all producers, landowners, and communities can participate in USDA programs, funding, and other authorities related to climate-smart agriculture and forestry practices?

- Significant attention needs to be placed on overall capacity building of current teams to address a diverse range of farmer needs.
- Local offices are historically understaffed. This should be addressed to allow employees to not only respond effectively to demands that come into their offices, but also to proactively reach out to individuals/farms in their communities that may not normally take advantage of available programs.

C. How can USDA ensure that programs, funding and financing capabilities, and other authorities related to climate-smart agriculture and forestry practices are implemented equitably?

- Targeted attention could be placed on ensuring broad levels of understanding and access to programs by targeted outreach toward any underserved audience.
- Increased engagement, including campaigns around program offering awareness, with community members, local organizations and trusted advisers could more equitably serve groups.