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September 16, 2024

Via Electronic Submission

Mr. Terry Cosby, Chief
Natural Resources Conservation Service
U.S. Department of Agriculture
1400 Independence Ave SW
Washington, DC 20250

RE: Request for Public Input About Implementation of the Sustainability Targets in Agriculture to Incentivize Natural Solutions (SUSTAINS) Act [Docket ID NRCS-2024-0014]

Dear Chief Cosby:

These comments are submitted on behalf of the Agricultural Retailers Association (ARA). ARA is the recognized unified national voice and trusted resource for agricultural retailers and distributors. ARA unites its members and their interests to advocate and educate on their behalf, provide services to improve their businesses, and preserve their freedom to operate and innovate, ensuring a safe and plentiful food supply for all. ARA members are scattered throughout all 50 states and range in size from small family-held businesses, farmer cooperatives, and large companies with multiple outlets.

ARA appreciates the opportunity to comment and commends the work being done by the United State Department of Agriculture (USDA) to aid in implementing the SUSTAINS Act. As you know, the business community, including agricultural retailers, are critical stakeholders and integral to the adoption of any conservation practices. We appreciate the USDA's outreach and inclusion in this process.

We value the USDA's initiative to seek input from the agricultural sector through this request for information (RFI), recognizing its crucial role in shaping future policy decisions,

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particularly regarding conservation and sustainability targets.

The SUSTAINS Act can be incorporated as a natural extension of current USDA conservation programs popular with farmers and in need of additional funding. Private sector entities can join in support of these programs. Farmers manage each field for its unique characteristics and specific crop. We feel greater program flexibility that offers menus of choices to qualify for program compliance will help more producers participate in enhanced conservation practices. Some of the choices may include new and emerging technologies that are boosted by farm-level research of innovative methods to jump-start understanding and adoption.

Ag retailers work directly with agricultural producers to help develop their crop plans and are increasingly becoming a conduit of information for USDA conservation programs. Additionally, we provide information on advancements with biostimulants, enhanced efficiency fertilizers, variable rate technologies, cover crops, no-till, strip till, and many other conservation-based practices. USDA, farmers, and ag retailers know what programs are popular. Ag retail's role can be enhanced if additional funding for popular conservation programs is available, and we can encourage and help farmers apply for these programs.

Increased conservation funding produces more demand for program implementation. Certified Crop Advisors (CCAs) are an integral part consulting with agricultural producers on their crop plans and become trusted advisors. USDA can include CCAs in the implementation of SUSTAINS and delivery of conservation technical assistance, as well as Technical Service Providers (TSPs) and USDA employees, to provide producers the maximum flexibility in applying for conservation programs. Designing programs that allow agriculture producers to stack program opportunities will be a step in the direction of maximum program participation so economic outcomes are positive at the field level. Allowing several pathways for implementation and conservation delivery will best support an equitable program, allowing producers to work with entities that they rely on as trusted advisors.

Agricultural producers are interested in their ag retailer providing planning assistance, information, equipment, and knowledge that will match conservation practices with the emerging carbon markets/practices promoted by the USDA. As the private sector carbon markets develop, USDA can play a productive role by modernizing their programs to meet the increasingly flexible needs at the field level.

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Thank you for the opportunity to submit comments and your continued commitment to supporting America's agriculture industry.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Hunter Carpenter". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Hunter Carpenter
Senior Director of Public Policy
Agricultural Retailers Association