RENEWABLE FUELS ASSOCIATION

April 15, 2024

Mr. Joseph Parsons
Acting Administrator
National Agricultural Statistics Service
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Re: Discontinuation of County Estimates for Crops

Dear Administrator Parsons:

I read with concern the announcement last week that the National Agricultural Statistics Service (NASS) is planning to discontinue issuance of county-level acreage, yield and production estimates for crops, including corn. On behalf of the members of the Renewable Fuels Association (RFA), who rely on NASS county data to help inform crucial business decisions, I am urging NASS to reconsider. With the rapid emergence of state and federal climate policies that will compel ethanol producers to carefully track certain feedstock characteristics, the availability of robust county-level data has never been more important.

RFA is the leading trade association for America's ethanol industry. Its mission is to drive growth in sustainable renewable fuels and bioproducts for a better future. The ethanol industry is one of the largest consumers of U.S.-produced corn, accounting for over one-third of total usage, and having accurate and sufficiently high-resolution data about corn production is critical for both market and policy purposes.

The RFA has two main concerns with the cancellation of county-level acreage and yield estimates. First, no other estimates of planted acreage are as comprehensive and widely accepted as those from NASS. While alternative county-level acreage data are available from the Farm Service Agency, only "producers participating in several [federal government] programs" are required to submit an "acreage report for all crops and land uses" to the FSA.[1] Thus, the FSA data provides an incomplete picture of planted acreage at the county level. NASS has always provided a more complete picture by using the FSA data "along with the NASS survey data and remote sensing data at specific times during

[1] https://www.fsa.usda.gov/news-room/efoia/electronic-reading-room/frequently-requested-information/crop-acreage-data/index

the growing season to arrive at planted acreage estimates."[2] As a result, the NASS total U.S. planted acreage estimate is larger than the sum of the corresponding FSA acres planted and acres failed categories, underscoring that the FSA data provide an incomplete picture of actual acreage.[3]

More importantly, while the FSA data might offer a second-best alternative to NASS acreage data, there is not a viable alternative source of county-level yield estimates. County-level yields can be calculated from Census of Agriculture data, but those are collected only once every five years. This can be problematic if there is adverse weather during the Census year; a notable example is 2012, when a major drought occurred. To smooth the effects of weather, which tend to be more pronounced at smaller geographic levels, approaches such as calculating the three-year centered average of NASS yield estimates can be used, but this is not possible with less-frequent Census data. Finally, it takes a considerable amount of time for the Census data to be processed and released (e.g., data from the 2022 Census were just released in February 2024).

NASS's planned discontinuation of county estimates is particularly ill-timed, as several federal agencies are working to develop a version of the GREET life cycle analysis model that will be used to estimate sustainable aviation fuel emissions in connection with section 40B of the Inflation Reduction Act (IRA). Since 2020, a Feedstock Carbon Intensity Calculator (FD-CIC) has been included in the Department of Energy's GREET model array, in order to allow more granular estimation of biofuel feedstock-related emissions intensities at the local level. Important aspects of feedstock carbon intensity are calculated at the county level in FD-CIC, and users can enter their localized or individual crop yield.

The version of GREET for use with IRA section 40B has not been released yet, but according to a statement by the agencies in the Sustainable Aviation Fuels Lifecycle Analysis Interagency Working Group, it "will incorporate new data and science, including new modeling runs specific to key feedstocks and processes for use in aviation fuel."[4] It has been reported that USDA worked with DOE's Argonne National Laboratory last year to ensure that accurate, up-to-date agricultural data were incorporated into the GREET model.[5] It is expected that the updated version of GREET could also inform implementation of the IRA's section 45Z Clean Fuel Production Credit.

It is anticipated that climate-smart farming practices will be recognized in this version of GREET. Moreover, some expect that county-level, or even farm-specific,

[2] https://www.nass.usda.gov/Education_and_Outreach/Understanding_Statistics/FSA_Acreage.pdf
[3] https://www.fb.org/market-intel/whats-the-reason-behind-the-difference-in-nass-and-fsa-acreage-data
[4] https://www.energy.gov/articles/interagency-statement-agencies-participating-sustainable-aviation-fuels-lifecycle-analysis
[5] https://www.reuters.com/sustainability/climate-energy/usda-adjust-ghg-model-help-ethanol-get-aviation-fuel-subsidy-2023-09-12/

carbon intensity scoring could be allowed under the IRA tax credit programs at some point in the future. For the USDA to discontinue reporting of high-resolution, annual crop yield data at a time when those data are needed for incorporation into the GREET model array and/or for use in the verification of farm-specific estimates would be regrettable.

In its announcement, NASS indicated, “The decision to discontinue these surveys and reports was not made lightly, but was necessary, given appropriated budget levels.” However, according to the USDA Budget Summary, the NASS budget was increased to $241 million in fiscal year 2024 from $211 million in 2023.[6] It appears that the discontinuation decision might have been based more on how NASS chooses to allocate its resources than on aggregate budget constraints, and it is highly disappointing that stakeholders were not consulted on the potential impacts of these decisions by NASS.

The quality and robustness of NASS data is incomparable, and the existing agricultural statistics reporting system is a unique strength that helps U.S. farmers and biofuel producers position themselves competitively in domestic and world markets. NASS data will be relied upon in new and important ways as climate-smart farming practices are adopted. Accordingly, we urge you to continue reporting county-level crop estimates.

Thank you in advance for your consideration of this request. Please do not hesitate to contact me should you have any questions.

Sincerely,

Geoff Cooper

Geoff Cooper
President and CEO

[6] https://www.usda.gov/sites/default/files/documents/2024-usda-budget-summary.pdf