

June 22, 2023

Dr. Seth Meyers
Chief Economist
US Department of Agriculture
Whitten Federal Building, Room 112-A
1400 Independence Ave SW
Washington, DC 20250

SUBJECT: Request for a 60-day extension to the comment period for the 2023 Update to Technical Guidelines for Quantifying Greenhouse Gas (GHG) Emissions and Carbon Sequestration at the Entity-Scale for Agriculture and Forestry (USDA-2023-0007)

Dear Dr. Meyers:

The undersigned agricultural organizations represent farmers and ranchers and organizations and businesses that support agriculture with goods or services. We are grateful for the opportunity to offer the US Department of Agriculture (USDA) with comments on the 2023 Update to Technical Guidelines for Quantifying Greenhouse Gas (GHG) Emissions and Carbon Sequestration at the Entity-Scale for Agriculture and Forestry (USDA-2023-0007). Given the critical importance of these guidelines, it is imperative that we have the opportunity to review them in depth and authoritatively. Given their length and complexity we are deeply concerned that the comment period that closes on July 10, 2023 is far too insufficient in length. For this reason we request that the comment period be extended by 60 days.

That additional time will allow us to evaluate the current 2014 guidelines in light of the significant and rapid changes that have occurred in many agricultural sectors' production systems since 2014. There are also further significant changes coming over the next several years in many of these sectors, and we would like to evaluate the current guidelines with those coming changes in mind.

Thank you in advance for your consideration of this request. Please contact any of our organizations if you have questions.

Sincerely,

American Farm Bureau Federation
American Horse Council
American Soybean Association
National Association of Wheat Growers
National Cattlemen's Beef Association
National Cotton Council
National Council of Farmer Cooperatives
National Milk Producers Federation
National Pork Producers Council
National Turkey Federation
United Egg Producers
US Poultry and Egg Association