

December 16, 2019

Desk Officer for Agriculture
Office of Information and Regulatory Affairs
Office of Management and Budget (OMB)
New Executive Office Building, 725 17th Street NW
Washington, DC 20503

Re: Field Crops Production – County Estimates Survey – Row Crops – Substantive Change

OMB Control Number: 0535-0002

Dear Agriculture Officer,

The undersigned are a coalition of scientists and commodity groups alarmed by the proposed cuts to the County Estimates program produced by the National Agricultural Statistics Service (NASS) of the U.S. Department of Agriculture (USDA).

NASS produces the world's most reliable agricultural data products on crop production and agricultural practices. The decision to discontinue County Estimates for certain crops and practices, most significantly the removal of questions about irrigation, is a major loss for scientists, economists, universities, non-profit organizations, farmers, and state and local governments that depend on this data. This data is irreplaceable – there is no comprehensive dataset publicly available that could replace what NASS compiles, and a failure to collect it today means that it will never be available for future use in charting historic trends and their causes.

Scientists use County Estimates to compare different practices across space and time. Oftentimes state-level data are simply not specific enough to draw meaningful comparisons. Without this data, scientists will be unable to know whether the practices they implement are resulting in the hoped-for changes in production, profitability, and inputs. State and local governments also rely on these data to enact sound conservation policies. For example, water use estimations can tell local governments when small town well water will run dry, and management practices based on water-use estimates can be put into place to protect the health of downstream fisheries. Farmers rely on NASS estimates when making contracts with buyers, and seed companies use the data to estimate how much seed they can expect to produce, and then to sell.

County Estimates are also used to allocate funding resources for agriculture research. With a limited amount of funding, it is vital that grant money goes to support the development of crops or animal breeds that will have the most impact in the geographic area where most of the production happens, and so the loss of these data will impact agronomic experiments, plant and animal breeding programs, and recommendations about plant fertility levels and time to maturity, all to the detriment of farmer profitability.

Importantly, while some of the crops slated for removal from the program may seem insignificant on a national scale, they are highly important regional crops. Sunflowers, for example, are one of the top ten most important crops in North Dakota, South Dakota, and Minnesota, and eighty percent of the country's flax crop is grown in North Dakota, the remainder growing in Montana. Flax farmers and buyers alike rely on county estimates for crop production and marketing, and because flax is a vital rotation crop, eliminating the collection of this data will negatively affect efforts to further diversify

cropping systems in the Northern Plains, undercutting efforts to bolster sustainability. Alfalfa is the nation's fourth largest commodity, and it is a critical rotation and cash crop in all western states. Alfalfa hay is used as a major feedstock for the dairy industry, and farmers and extension professionals need strong statistical information for its management and planning. County-level dry bean data is used to assess and forecast new and existing stresses, to understand infrastructure needs, and to determine the economic impact of the dry bean food chain within each county.

The loss of irrigated/non-irrigated data is particularly concerning. Scientists use county-level irrigation data from NASS to draw connections between practices, weather, and outcomes like yield. These connections can be used to discover vulnerabilities for specific crops, for example to climate change, and to suggest remedies.^{1,2} Scientists also depend heavily on information about irrigated vs. non-irrigated practices to make critical decisions about water use. The potential loss of this data is especially dire considering the country's groundwater is being used faster than it naturally can replenish. Increasingly frequent droughts, for example in the heavily agricultural areas of the central United States and the central valley of California, contribute to the pressing need for timely, accurate, and locally specific information on irrigation. Scientists need more information about irrigation and water use, not less.

County-level information on irrigated crop yields is critical to understand the large differences in productivity between non-irrigated and irrigated crops. Nebraska, for example, has the largest amount of irrigated acreage in the United States, but without yield information differentiated by irrigation, it would be impossible to know how much of that productivity is due to irrigation as opposed to other factors (e.g. management practices, healthy soil). The average corn yield for a county in Nebraska with a high percentage of irrigation would mask the large differences currently seen between irrigated and non-irrigated acres. In fact, the yield gap between irrigated and non-irrigated crops may be increasing for major U.S. field crops, including maize.³ In Alabama, local governments and universities use this data to encourage geographically appropriate management practices based on irrigation strategies, and with increasing urban competition for farmland and water, it is vital to be as efficient and environmentally responsible as possible. Cutting county level data will take away essential information that helps an already-struggling sector of the economy – local agriculture.

It is a serious concern that asking NASS to reinstate these estimates will simply pull funding from another program, resulting in another threat to agricultural knowledge and productivity. We strongly encourage USDA NASS and OMB to work together to find a way to reinstate this program without canceling other important data collection efforts. For example, perhaps RMA has data that it could share with NASS to fill in where NASS's collection efforts fall short, or OMB could request the \$800,000 shortfall from Congress.

¹ Elias, Emile, et al. "Diverse landscapes, diverse risks: synthesis of the special issue on climate change and adaptive capacity in a hotter, drier Southwestern United States." *Climatic change* 148.3 (2018): 339-353.

² Kerr, Amber, et al. "Vulnerability of California specialty crops to projected mid-century temperature changes." *Climatic change* 148.3 (2018): 419-436.

³ Kukal, Meetpal, and Suat Irmak. "Irrigation-limited yield gaps: trends and variability in the United States post-1950." *Environmental Research Communications* (2019).

We thank the U.S. Department of Agriculture and the Office of Management and Budget for the opportunity to comment on this important governmental function, and we urge the continuation of data collection for the benefit of farmers and all Americans.

Sincerely,

American Pulse Association
American Society of Agronomy
AmeriFlax
Crop Science Society of America
The FIFRA Endangered Species Task Force
National Association of State Departments of Agriculture
National Barley Growers Association
National Sunflower Association
Soil Science Society of America
US Canola Association
US Dry Bean Council
USA Dry Pea & Lentil Council