

**Comments of Brian Jennings
CEO
American Coalition for Ethanol (ACE)**

USDA Public Consultation on Climate-Smart Agriculture Biofuel Feedstocks

October 15, 2024

Thank you for the opportunity to comment. My name is Brian Jennings and I'm the CEO of the American Coalition for Ethanol (ACE).

ACE is proud to partner with USDA on two Regional Conservation Partnership Program (RCP) projects to improve upon model-generated credit values for biofuel feedstocks produced with climate-smart ag (CSA) practices.

First, in South Dakota, we are working with 29 farmers nearby Dakota Ethanol LLC to adopt various CSA practices on nearly 30,000 acres (primarily no-till, but including some cover crops and nutrient management).

This RCP involves South Dakota State University and DoE's Sandia National Lab whom will soon collect data to measure and model the resulting GHG benefits of the practices.

Second, USDA has entrusted ACE to replicate this activity in a 10-state region involving 167 counties and 13 additional ethanol facilities.

- The locations for this larger RCP were chosen to capture variations in precipitation, temperature, and soil type across the Corn Belt.
- To date, 350 farmers have expressed interest to enroll 500,000 acres in our project – this is 5.5 times more acres than available funds!
- We intend to have farmer contracts signed yet this year for CSA practice adoption in 2025

Once farmers have adopted the practices, land-grant scientists will collect soil samples and other data so DoE can pressure test the GREET model, which Congress requires for non-aviation fuel under the 45Z credit.

As USDA continues to engage Treasury regarding guidance for 45Z, please keep in mind the following;

- Models and credit values for CSA practices should routinely be updated incorporating data collected through ACE's RCP projects. Ultimately, our projects are designed to improve the accuracy of GREET and address perceived "information gaps" currently preventing farmers and ethanol producers from monetizing CSA practices in regulated markets
- 45Z should allow individual CSA practices and stacking of practices. Do not require the all-or-none "bundled" approach from 40B or arbitrarily cap credit values
- Finally, USDA has a successful track record of stewarding taxpayer funds for commodity and conservation programs, ensuring farmers comply with specifications developed in each state by NRCS and leading land-grant scientists. Before farmers can be reimbursed

for adoption of practices under our RCPP projects, ACE will leverage these same protocols. Treasury should not recreate the wheel for 45Z. They should rely on USDA's expertise for compliance and verification.

Thank you.