



January 29, 2024

Field to Market: The Alliance for Sustainable Agriculture  
777 North Capitol St NE #803  
Washington, DC 20002

**RE: Open Public Comment Period for Proposed Revision to Biodiversity Metric**

Submitted via email to [science@fieldtomarket.org](mailto:science@fieldtomarket.org)

To Whom It May Concern,

Thank you for the opportunity for the American Seed Trade Association (ASTA) to provide comments on the Wildlife and Landscape Diversity (WILD) Index. ASTA's membership consists of nearly 700 companies involved in seed production and distribution, plant breeding, and related industries in North America. ASTA maintains a robust environment and conservation seed sector, including cover crop and restoration seed, that hold a strong interest in assisting agricultural producers in finding professionally produced, high quality seed to achieve their conservation goals.

ASTA members work within their local geography and with NRCS plant materials centers to develop and market cover crop varieties that will work well with the cropping systems and local climatic patterns. As such, our members have become well versed in specific varieties and cover crop seed mixes that will lead to success in meeting a growers' specific conservation needs. ASTA appreciates the inclusion of cover crops and residue cover in the points calculation for the index, and we are pleased to be able to provide the following recommendations and comments on the new biodiversity index:

- Regarding the points scale associated with cover crop adoption and complexity of seed mixtures, we suggest adding additional points for winter terminal multi-species if that cover crop grew for 75 days and had a variety that produced grain for wildlife. This approach should be considered on a similar scale as a winter hardy species that was terminated after flowering, both providing a food source for wildlife or pollinators.
- The index, as proposed, fails to consider that some growers might be using summer cover crops instead of fall planted winter cover crops. Options should be added for winter crop producers and others using rotations that could include summer covers.
- The description of semi-natural habitat includes only new habitat and not existing habitat or restored habitat. Growers that have managed habitat should receive credit for the existing biodiversity they have created over time.

The new WILD Index is an improvement over the existing Habitat Potential Index because it includes the infield benefits from cover crops and other conservation practices; however, the Index fails to acknowledge the below-ground biodiversity and soil health properties that increase the living organisms in the soil. ASTA encourages Field to Market to continue work in this area and look to expand the metric in the future to more accurately capture the multiple benefits conservation practices that increase biodiversity above and below ground. Additionally, we hope Field to Market will look to expand this and all metrics to include new approaches to planting cover crops, including perennial cover crops and wider row planting that allows for the planting cover crops with the cash crop.



Thank you again for the opportunity to provide comments on the WILD Index. ASTA looks forward to continuing to work with Field to Market to help expand and refine the index.

Sincerely,

A handwritten signature in black ink, reading "A. W. LaVigne". The signature is written in a cursive style with a large initial 'A' and 'L'.

Andrew W. LaVigne  
President & CEO