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June 2, 2010

AFRI Competitive Programs (CP) Unit
National Institute of Food and Agriculture
U.S. Department of Agriculture
STOP 2240
1400 Independence Avenue, SW.
Washington, DC 20250–2240

Docket Number NIFA–2010–0001

The American Society of Agronomy (ASA), Crop Science Society of America (CSSA) and Soil Science Society of America (SSSA) are writing in response to Docket Number NIFA-2010-0001 regarding the United States Department of Agriculture's (USDA) National Institute of Food and Agriculture (NIFA) Agriculture and Food Research Initiative (AFRI). The American Society of Agronomy (ASA), founded in 1907, Crop Science Society of America (CSSA), founded in 1955, and Soil Science Society of America (SSSA), founded in 1936, are prominent international scientific societies headquartered in Madison, Wisconsin. The more than 9,700 members of the three Societies, and associated 13,500 Certified Crop Advisers, Certified Professional Agronomists, Certified Professional Soil Classifiers, and Certified Professional Soil Scientists, are dedicated to the sustainable production of food, feed, fiber, and fuel crops, while conserving our natural resources and maintaining and improving the environment. Membership in ASA, CSSA, and SSSA is tax-deductible because the Societies are non-profit, educational organizations. Since their inception, ASA, CSSA, SSSA have continued to grow, modifying their educational offerings and annual meetings to support the changing needs of members. Today, ASA, CSSA, and SSSA are seen as progressive scientific societies meeting member needs through publications, recognition and awards, career placement service, certification programs, training, national and regional meetings, and student activities. The three Societies also have a Science Policy Office in Washington, D.C., to give members a voice in the federal government. More information on ASA, CSSA, and SSSA can be found at: www.agronomy.org, www.crops.org, and www.soils.org, respectively.

ASA, CSSA and SSSA appreciate the opportunity to comment on AFRI, one of USDA's most important research, education and extension programs. We applaud the efforts of USDA to modify NIFA with the goal of advancing discovery in the agricultural sciences. However, the

2010 AFRI RFA has several critical problems that must be addressed and improved for the 2011 AFRI RFA:

1. Continued funding to AFRI and other NIFA programs is essential.
2. We do not agree with NIFA's application of the New Biology report.
3. The narrow focus of the 2010 RFA does not facilitate the highest quality science.

1. Continued funding to AFRI and other NIFA programs is essential

ASA, CSSA, and SSSA applaud the Obama Administration's strong FY 2011 funding request for AFRI of \$429 million, a \$167 million (64 percent) increase over FY 2010 enacted, a significant step towards achieving AFRI's authorized \$700 million funding level. This increase will provide stakeholders new opportunities to conduct research, education and/or extension projects to better address the President's priorities-- food security, agriculture's role in mitigation of and adaptation to climate change, sustainable bioenergy production, nutrition and environmental protection.

While ASA, CSSA, and SSSA appreciate the President's efforts to revitalize publicly funded agricultural research, education, and extension, we are also firmly committed to other NIFA programs including Hatch (research) and Smith-Lever (extension) formula programs, as well as USDA's intramural research arm, the Agricultural Research Service (ARS). Therefore, we urge the Administration to ensure that the proposed increase for AFRI represents overall increases in investment for all such programs supported by USDA.

ASA, CSSA, and SSSA understand the Administration's bold move towards a continuation funding mechanism for large grants in the challenge areas, similar to the approach currently employed by the National Institutes of Health and National Science Foundation. If successful, this funding approach will result in continued strong support for both challenge areas and new projects. As end users, we vow to work closely with Congress to help ensure that the funding increases needed for AFRI are in fact delivered annually. With that in mind, we urge USDA to continue to request sufficient budget increases each year to provide adequate support for new grants on an annual basis, as a shortfall in these annual increases for AFRI, could result in limited or no new requests for applications (RFA) in future years—a reality that would be detrimental to agriculture, food, and natural resource sciences.

ASA, CSSA, and SSSA again appreciate the bold new approach taken by USDA to shift to very focused challenge area AFRI RFAs so that the agency can deliver tangible products which, in turn, will help the agency raise its profile and address specific, large-scale, societal problems. However, it is critical that NIFA maintain the capacity to offer viable requests for applications

on an annual basis in order to ensure a continuity of research across the nation. ASA, CSSA, and SSSA urge USDA to keep in mind the importance of keeping a balance within AFRI to guarantee that progress from ongoing research efforts is not lost and research capacity not diminished. In addition, knowledge gaps caused by the absence of research in related sub-discipline areas may hinder achievement of the broader, system-level impact goals of the AFRI program. Weed management information, for example, will be critical to developing sustainable bioenergy production systems and fully understanding likely cropping system responses to climate change. Exploitation of fundamental research results in modifying farming practices, or in setting agricultural policy, should be based on a broad understanding of all important factors and their interactions.

2. We do not agree with NIFA's application of the New Biology report.

The recent NRC report, *A New Biology in the 21st Century*, lays out four grand challenges/societal needs—sustainable food production, ecosystem restoration, optimized biofuel production, and improvement in human health – to be addressed with new funding across agencies, disciplines and scales of investigation,. The New Biology Initiative was never intended to replace ongoing research within a single agency such as the USDA NIFA. NIFA should define and prioritize the problems to be addressed, but avoid narrowly prescribing solutions, and be supportive of simple and cost-effective techniques as well as approaches that utilize the tools of New Biology to solve the problems facing American agriculture.

3. The narrow focus of the 2010 RFA does not facilitate the highest quality science.

For AFRI to achieve the goal of funding the most important and highest-quality science, the program must let the best ideas rise to the top and narrowly focus research on a few problems that may or may not be poised for a near term solution. A prime example of this problem lies in the exclusion of nutrient pollution issues from the AFRI RFA. It is noteworthy that in the same year that President Obama issued an executive order that could lead to a TMDL for the Chesapeake Bay, nutrient pollution is excluded as a primary funding focus area from AFRI. Agriculture is the leading source of surface water nutrient pollution, and USDA has been working toward solutions to this problem for decades. Many groups are poised to make substantial contributions in this area based on prior AFRI investments, but the new AFRI RFA fails to capitalize on those past investments.

In order to accommodate the myriad issues in agriculture, the RFAs will need to change on a regular basis. This means that proposals that take substantial time and energy to develop will not be useful in subsequent funding cycles. The problem is particularly acute for a program such as AFRI that funds less than 20 % of submitted proposals. One of the hallmarks of a good

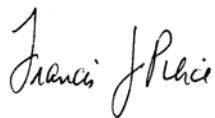
funding program is that it allows peer review to provide feedback so that good ideas that need work eventually become great ideas that get funded. This approach should continue.

Another concern of ASA, CSSA, and SSSA is the loss of continuity in research, education, and extension programs which could occur now that the agency has dissolved the Integrated Activities programs. We encourage NIFA to carefully examine the effects of AFRI program changes on ongoing research efforts and urge that steps be identified to ensure continuity, wherever possible during the program transition.

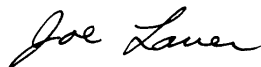
Finally, ASA, CSSA, and SSSA would like to emphasize the importance of stakeholder involvement as the AFRI program evolves. Stakeholder involvement and buy-in are critical, especially given the major changes being implemented by USDA. With the implementation of the continuation funding mechanism, stakeholder support of the program will be essential in trying to secure sufficient resources to make the AFRI a viable program from year-to-year. As NIFA considers further refinements to the AFRI program and future Requests for Applications, stakeholder involvement is critical. ASA, CSSA, and SSSA commend NIFA for holding the public meeting, and strongly encourage the agency to provide continuing opportunities for stakeholder involvement.

Thank you again for providing the American Society of Agronomy, Crop Science Society of America, and Soil Science Society of America the opportunity to comment.

Sincerely,



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President
American Society
of Agronomy



Joe Lauer
President
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