



July 6, 2026

Mr. Scott Edwards
Associate Chief
Natural Resources Conservation Service
1400 Independence Avenue, SW
Washington, DC 20250

Via Regulations.gov Docket: NRCS-2026-0034

Dear Mr. Edwards:

The American Seed Trade Association (ASTA) welcomes the opportunity to submit comments on the proposed changes to conservation practice standards (CPS) in the National Handbook of Conservation Practices (NHCP). Our nearly 700 members represent companies and researchers involved in production, distribution, plant breeding, and related activities that comprise the supply chain, for every kind of seed (grasses, forages, flowers, vegetables, row crops, and cereals) and across every production system (conventional, organic, and biotechnology). 95% of ASTA's active members are small businesses according to the Small Business Administration's categorization, while the total membership represents roughly 85% of all private seed companies operating in the United States. The strong representation across the forage, turf, and conservation seed production supply chain enables ASTA to bring together a variety of diverse perspectives that can provide meaningful suggestions to improve NRCS delivery of conservation assistance.

The American Seed Trade Association appreciates the interest in updating Practice 513 (Annual Forages for Grazing Systems), which can help producers mitigate plant pest pressures; limit nutrient transport to surface or groundwater; reduce soil compaction; improve soil aggregate stability; and manage forage to meet livestock nutritional requirements during known periods of forage quality deficit. ASTA supports the emphasis that the proposed revisions place on purchasing high quality seed from reputable sources. However, the Association is concerned about the language related to pure live seed (PLS) testing standards. The proposed text states:

Coated seed planted at a bulk rate must also meet the germination and purity minimums, typically 80-90% PLS, as regulated by Federal and state seed laws.

The PLS standard typically applies to native seeds, not annual forages. Because native seeds have more variable germination and purity rates than forages, the PLS standards ensure that purchasers of native seed are not paying for a significant amount of inert material that is not the seed itself. Conservation program purchasers, however, typically buy forages by the bulk pound of seed because the purity is consistently much higher and the germination is less variable.

Before selling forage seed, companies occasionally coat seeds with a lime-based material to improve flowability, which allows consumers to more easily seed complex mixtures. Because this material is considered inert, when companies coat the seeds at the standard 34% percentage, the purity of that seed falls to a maximum of 66%. If NRCS judges the quality of the forage seed

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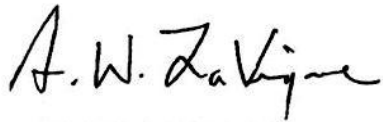
according to the PLS standard, then the majority of forage seed in the United States may not qualify for conservation programs because it would fail to meet the 80% PLS minimum. ASTA recommends including the bold phrase in the sentence shown above:

*Coated seed planted at a bulk rate must also meet the germination and purity minimums, typically 80-90% PLS **prior to seed treatment**, as regulated by Federal and state seed laws.*

This minor addition would ensure that the conservation practice standard accurately reflects the realities of the forage seed production process without significantly altering the changes that NRCS proposed. The agency could also lower the acceptable PLS percentage threshold to 50 % for coated seed only, thereby accounting for this coating process and rectifying the issue.

ASTA thanks NRCS for its continued support for America's farmers and ranchers, as well as its investments to Keep Working Lands in Working Hands.

Sincerely,

A handwritten signature in black ink, reading "A. W. LaVigne". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Andrew W. LaVigne
President & CEO