TEXAS DEPARTMENT OF AGRICULTURE

TODD STAPLES
COMMISSIONER

June 9, 2009

Ms. Lisa Jackson
Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Administrator Jackson:

Thank you for the opportunity to comment on the proposed rules for the mandatory reporting of greenhouse gases. The matter of greenhouse gas regulation is vitally important to the Texas agriculture industry, which impacts the state's economy more than $103 billion annually.

As you know, the agriculture industry is susceptible to unnecessary economic harm at various points in the greenhouse gas regulation process. We must be very cautious when attempting to regulate naturally-occurring greenhouse gases and also when regulating greenhouse gases that are directly tied to the production of life's basic necessities such as food. The proposed mandatory reporting rules will increase input costs in the production process and place additional burdens on agricultural producers and the manufacturers of agricultural goods.

In regard to reporting for manure management, which would affect certain cattle, dairy, poultry and pork facilities, the livestock industry is vital to the economy, and additional reporting requirements would increase financial costs and administrative procedures for producers. The total economic impact of livestock in the state of Texas is $21.8 billion annually. Your agency anticipates that the proposed reporting rules for this category would impact approximately 50 facilities nationwide, and as a national leader in cattle, dairy, poultry and pork production, Texas farmers and ranchers will undoubtedly be negatively affected.

Significant uncertainty about this matter remains in the agriculture industry. Frankly, there is great concern about the process of pursuing greenhouse gas regulation. For example, EPA continues to pursue greenhouse gas regulatory measures without a clear finding that these gases endanger public health or welfare. Similarly, it is doubtful that

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the regulatory impact statement prepared by EPA accurately reflects the number of agriculture-related facilities that will be affected, and many industry groups have concerns with definitions and methodologies outlined in the proposed rules.

You will never find better environmental stewards than farmers and ranchers; more than any other sector, we rely most on raw natural resources for our livelihood. Accordingly, the agriculture industry is following greenhouse gas and carbon emission policy development closely and is still working to analyze the impact of all aspects of the many greenhouse gas regulation proposals.

I urge you to move cautiously with the implementation of all related programs and to prioritize your communication with the state departments of agriculture and the various agriculture industry organizations. It is essential that EPA avoid harmful externalities and ensure that the greenhouse gas policies implemented produce true environmental benefits while ensuring the United States' continued domestic food production capabilities. The consequences of becoming dependant on imported food could far outweigh those of imported oil.

Sincerely yours,

Todd Staples

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