TEXAS DEPARTMENT OF AGRICULTURE

TODD STAPLES
COMMISSIONER

September 17, 2010

The Honorable Lisa Jackson, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Administrator Jackson:

Thank you for the opportunity to review and comment on the August 2010 "Coming together for Clean Water, EPA's strategy for achieving Clean Water" document.

I am pleased the U.S. Environmental Protection Agency (EPA) recognizes the need for a science-based stakeholder driven process to address the nation and state's water quality. Agricultural producers are, and must continue to be, good stewards of the land and water we depend on for our livelihoods. The Texas Department of Agriculture (TDA) supports EPA's efforts to proactively leverage funding to keep healthy watersheds from becoming impaired, a more cost effective approach than cleaning up a watershed after it has been impaired, and to encourage stakeholder involvement in voluntary programs, including watershed protection plans.

EPA's call for new national legislation, or administrative action, for additional pesticide and CAFO regulation is concerning. States must maintain authority to develop permits and regulations tailored to their individual jurisdictions. Today, none of Texas' streams, rivers and lakes are impaired by currently use pesticides, and Texas has some of the most effective CAFO programs in the nation. Our system is successful, but additional regulation imposed by the federal government will prove burdensome to agricultural producers and provide little, or no, environmental benefits.

As EPA moves forward with this initiative, please ensure all administrative action is based on well-vetted, sound science that focuses on resolving documentable water quality concerns through flexibility and participation from stakeholders. I look forward to working with you in the future.

Sincerely yours,

Todd Staples

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