

# TEXAS DEPARTMENT OF AGRICULTURE

TODD STAPLES  
COMMISSIONER



April 19, 2011

The Honorable Tom Vilsack  
Secretary of U.S. Department of Agriculture  
Washington, D.C. 20520

Dear Secretary Vilsack:

Thank you for the opportunity to provide comments on the U.S. Department of Agriculture's (USDA) efforts to implement a strategic plan for climate change research, education and extension. Today, I write in response to the recent proposal to develop technical guidelines and scientific methods for quantifying greenhouse gas (GHG) emissions and carbon sequestration.

First and foremost, I support voluntary, market-based methods for preserving our environment, especially as an alternative to ineffective and costly mandatory regulations. Secondly, any strategic plan for implementing environmental preservation and improvement initiatives must be based upon the overriding principle that landowners are the original and true stewards of our environment. Depending on the environment for their livelihood gives landowners a vested interest in environmental preservation.

Additionally, in preparing these guidelines and continuing implementation of the strategic plan, I urge USDA to focus on utilizing proven scientific methods to evaluate the effects of climate change on agriculture, as well as any impact of agriculture on GHG emissions and the costs and benefits the industry might realize from participation in a GHG reduction program.

Today, American farmers and ranchers manage climate challenges and competition for resources from other industries, both domestically and abroad, while continuing to supply the needs of the world's growing population. With development of the technical guidelines, USDA can work to ensure other federal agencies do not take the United States backwards under poorly designed greenhouse gas regulation programs, like the scheme currently promoted by the U.S. Environmental Protection Agency (EPA).

We know the costs of being dependent on foreign oil. We cannot afford to be dependent on foreign food. If EPA continues on the current path, raising the cost of agricultural inputs and promoting policies that limit food and fiber production and leave fields fallow or forests overgrown, U.S. consumers will pay higher prices for the basics of life. Additionally, the environment will be no better or worse, and the world's poor and hungry will continue to struggle to pay more for basic grains that U.S. farmers will be hampered from producing.

Sincerely yours,

Todd Staples

TS/JM/jm

