TEXAS DEPARTMENT OF AGRICULTURE

TODD STAPLES
COMMISSIONER

November 27, 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 regulation of greenhouse gas (GHG) emissions from motor vehicle sources. The matter of greenhouse gas regulation is vitally important to the Texas agriculture industry, which has an economic impact of $103 billion annually on the state's economy.

As in previous comments submitted to your agency on the proposed endangerment finding and the proposed greenhouse gas reporting rules, I remain concerned that regulation of GHG emissions will decimate Texas agricultural producers and our state's economy. From small farmers and ranchers to agricultural processing facilities, all steps in the industry's production chain may be affected by the GHG regulatory proposals. If our agricultural producers are capable of bearing the resulting increased costs of fuel, fertilizer, transportation and processing, the American consumer will see significant increases in the prices they pay for the very basic necessities of food and clothing.

I am specifically concerned that the GHG provisions included in the motor vehicle proposal may impose Prevention of Significant Deterioration (PSD) and Clean Air Act Title V permitting requirements on a host of stationary sources. In the proposed PSD tailoring rules, EPA estimates that nationwide "small sources" will be subject to approximately $38 billion in permitting costs under the Title V program.

I urge you to fully consider the impact of the proposed motor vehicle rule. It is imperative the true impact of this rule is understood prior to the regulation of GHG emissions from motor vehicle sources.

Sincerely yours,

Todd Staples

TS/KS/ks

cc: Mr. Ronald Medford

P.O. Box 12847 Austin, Texas 78711 (512) 463-7476 Fax: (888) 223-8861
For the Hearing Impaired: (800) 735-2989 (TTY)
www.tda.state.tx.us