



600 E Boulevard Ave., Dept. 602  
Bismarck, ND 58505-0020

*Equal Opportunity in Employment and Services*

November 26, 2008

U.S. Environmental Protection Agency  
Air and Radiation Docket and Information Center  
1200 Pennsylvania Ave., NW.  
Washington, DC 20460

**RE: Docket ID No. EPA-HQ-OAR-2008-0318**

Email: [a-and-rDocket@epa.gov](mailto:a-and-rDocket@epa.gov)

Fax: 202-566-9744

To Whom It May Concern:

The North Dakota Department of Agriculture respectfully submits the following comments on the Environmental Protection Agency's (EPA) Advance Notice of Proposed Rulemaking (ANPR) for regulating greenhouse gases (GHG) under the Clean Air Act (CAA).

The National Association of State Departments of Agriculture (NASDA) submitted comments on behalf of its membership. As a member Department, we individually reiterate our support of NASDA's comments.

We also support USDA's comments that were submitted to the Office of Management and Budget (OMB) for interagency review and included in the ANPR. USDA's comments point out that most of the 1.9 million farms on our agricultural landscape "simply could not bear the regulatory compliance costs."

The ANPR is a 564-page document with more than a thousand pages of technical and supporting documents that present about 400 complex issues for public comment—many of which directly and adversely impact agriculture. The ANPR would vastly expand the CAA Title V permit program to virtually every agricultural operation. In reality, this amounts to a tax on livestock and food production that will also be passed on to consumers.

We strongly oppose the far-reaching and blanket approach of GHG regulation outlined by EPA. This approach would seriously impact agriculture and the ability to produce the food and fiber on which our country depends. The agriculture community knows that greenhouse gases are a real issue and need to be responsibly dealt with, but the approach taken in this ANPR is very misguided.

Agriculture provides not only the food and fiber of America, but is the largest offset provider against human activity. A healthy agricultural landscape provides clean air, water, and open space. If the programs contemplated by the ANPR are ultimately proposed and adopted, we firmly believe that it will place a staggering cost on agricultural producers, consumers, and the U.S. economy—all with little or no environmental benefit. We urge you to carefully consider agriculture's needs as we continue to enhance environmental protection while maintaining a viable farm production system.

Sincerely,

A handwritten signature in blue ink that reads "Roger Johnson".

Roger Johnson  
Commissioner