



PEW COMMISSION ON
INDUSTRIAL FARM
ANIMAL PRODUCTION

February 26, 2008

Stephen L. Johnson, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Administrator Johnson:

The members of Pew Commission on Industrial Farm Animal Production (PCIFAP) were interested to read in the Washington Post today that the Environmental Protection Agency (EPA) had published a proposed rule to eliminate the requirement that agricultural operations disclose air pollutant emissions above certain levels, as required by CERCLA and EPCRA. While we were aware of the proposed rule as early as December of 2007, the timing of the news on the approval process raises concerns.

The Pew Commission was under the impression that the recently formed Farm, Ranch, and Rural Communities Advisory Committee was going to be investigating issues such as air pollution from agriculture and then make recommendations to the EPA about how to approach these important issues that directly affect public health.

Decisions such as this, with the potential to impact rural communities in dramatic ways, should not be made lightly. Given the opposition that the publication of this rule has generated, it seems there should have been, and should be, consultation with stakeholders and the Advisory Committee before decisions like this are made. A preemptive proposed rule on exempting large animal feeding operations from reporting ammonia or hydrogen sulfide releases without consulting your own advisory commission questions EPA's commitment to making that advisory commission more than "window dressing".

As the EPA advisory committee ramps up their work, the Pew Commission hopes that they can provide the EPA with balanced and thoughtful input on issues such as air pollutant releases from agricultural operations. We reiterate our offer to meet with the Advisory Committee to discuss what we have learned in our 2 ½ year study.

Sincerely,

Robert P. Martin
Executive Director
Pew Commission on Industrial Farm Animal Production