



Aug. 19, 2009

The Honorable Tom Vilsack  
Secretary of Agriculture  
Room 200-A Jamie L. Whitten Building  
1400 Independence Avenue, S.E.  
Washington, DC 20250

Dear Secretary Vilsack:

On behalf of the National Association of Wheat Growers, I write to you today concerning legislation pending before the U.S. Congress that would begin to regulate greenhouse emissions while providing opportunities for regulated industries to offset those emission requirements through the purchase of carbon credits generated by soil carbon sequestration and other means.

As you know, there is deep concern about the economic impacts of such regulation either through legislation or in the form of administrative regulations. While we applaud the Department of Agriculture for putting forward a preliminary cost/benefit analysis, we recognize that many other such studies have also been published in the recent past. While we recognize that many of these attempts to analyze this complex issue draw varied conclusions based on differing assumptions made, we believe it could be very useful for USDA to present a comparison of the various outstanding studies along with the range of conclusions drawn from each.

We understand there are inherent problems examining such a complex issue with so many variables and unknowns. While possible economic gains may be realized, possible economic losses may also result, particularly for actors in such an energy intensive sector as production agriculture. In this regard, a comparison by USDA of various existing economic studies would be both useful and timely.

Finally, these cost/benefit issues may arise not only as a result of legislative initiatives but also may result from court-driven administrative regulations. We believe the potential of both should be taken into consideration, regardless of when either may occur.

Again, we commend USDA for the steps already taken in this regard, but also believe further analysis as suggested above could be of great mutual benefit for all involved.

Thank you in advance for your consideration of our concerns and please feel free to have any of the USDA staff contact me with further questions that may arise.

Sincerely,

Karl Scronce  
President