

Secretary Daniel Glickman  
United States Department of Agriculture  
c/o Regulatory Analysis and Development  
PPD, APHIS, Suite 3C03  
4700 River Road  
Unit 118  
Riverdale, MD 20737-1238

Att.: Docket No. 97-018-2

**COMMENTS CONCERNING DOCKET NUMBER 97-018-2**

Pursuant to the Animal and Plant Health Inspection Service ("APHIS"), USDA, Advanced Notice of Proposed Rule Making Licensing Requirements For Dogs and Cats published in the *Federal Register* on June 24, 1998, the Doris Day Animal League submits these comments on behalf of the following organizations (collectively referred to herein as "Petitioners"):

Doris Day Animal League  
Suite 100  
227 Massachusetts Avenue, N.E.  
Washington, D.C. 20002

The American Society for the Prevention of Cruelty to Animals  
1755 Massachusetts Avenue, N.W.  
Washington, D.C. 20036

The Humane Society of the United States  
2100 L Street, N.W.  
Washington, D.C. 20037

The Fund for Animals  
Suite 301  
8121 Georgia Avenue  
Silver Spring, MD 20910-4933



**Pennsylvania Legislative Animal Network  
P.O. Box 12085  
Harrisburg, PA 17108-2085**

**Animal Protection Institute  
2831 Fruitridge Road  
Sacramento, CA 95820**

**Council for Compassionate Governance  
Suite 508  
236 Massachusetts Avenue, N.E.  
Washington, D.C. 20002**

**American Humane Association  
Suite 203  
236 Massachusetts Avenue, N.E.  
Washington, D.C. 20002**

**People For The Ethical Treatment of Animals  
501 Front Street  
Norfolk, VA 23510**

**Animal Legal Defense Fund  
401 East Jefferson Street  
Rockville, MD 20850**

**INTRODUCTION:**

On behalf of our estimated seven million nine hundred and seventy thousand members and supporters, we strongly support narrowing the definition of "retail pet store" under USDA regulations to exclude establishments and individuals selling dogs and cats to the ultimate consumer, although they may not operate a "store." We also strongly recommend revising the regulations to include the dealers of hunting, security and breeding dogs. It is disappointing that the USDA has chosen to delay further issuing regulations in this matter by requesting information about numbers of potential new licensees. While such data will be helpful in determining the amount and distribution of resources, they have

no bearing on the need to amend the regulations to make them comply with the clear language of the Federal Animal Welfare Act and with Congressional intent.

The petitioners strongly recommend that the limitations on the number of "breeding females" be kept at three, with the understanding that the USDA will continue to focus its energies on the establishments which have significantly higher numbers of dogs or cats at each facility.

While we agree that the establishments selling large numbers of animals are more likely to need significant regulatory oversight, and that the agency has limited funds for the enforcement of this Act, we do not agree that only entities having large numbers of animals on their premises should be required to be licensed. Just as other law enforcement agencies focus their attention on cases most likely to yield the greatest good in terms of carrying out their jurisdictional responsibilities and, therefore, combating the violations that are potentially the most harmful to society, the USDA should so focus its resources. However, to say that only those entities on which the USDA is going to focus are required to be in compliance, is a false premise not found in any other area of regulation. To follow this analysis to its logical conclusion, one could speciously argue that pollution regulations should apply only to large polluters, which are more likely to cause significant problems; while the agency rightfully focuses its attention on the larger facilities, small polluters, under this scenario, would be able to dump at will in our waterways. The lack of logic in this approach is evident. Resource constraints may dictate a system of priorities, but it is inconceivable that an agency would simply give an entire class of operators, whose coverage under the law is clear, *carte blanche* to violate that law.

This, in effect, is what the USDA proposes to do. The Advance Notice of Proposed Rulemaking suggests that the USDA is, wrongly, focusing on numbers rather than on its regulatory responsibilities. The agency would be better served by separating its regulatory standards for compliance with the Act from its strategy for using its limited resources for enforcement. Thus, by maintaining the licensing exemption at "three or fewer breeding females," all establishments that Congress intended to be covered would have to comply with the law, but the agency would still have the flexibility to use its risk-based analysis to determine how and where best to deploy its enforcement efforts, while retaining the legal authority to correct egregious situations that come to its attention outside its enforcement focus.

Throughout the Advanced Notice for Proposed Rulemaking, the agency goes to extreme lengths to discuss the financial burdens that would be placed upon the agency should it implement and enforce the AWA in the manner sought by the petitioners. We remind the agency that the previous rulemaking requests, and subsequent litigation made by the commentators has sought to bring the agency's regulations into compliance with the statutory requirements of the AWA. To that end, a lack of resources, and even a lack of bad faith on the part of agency officials, is not a legally valid excuse for failing to implement the statutory requirements of the Act. See e.g., *Robertson v. Jackson*, 766 F. Supp. 470 (E.D. Va. 1991), affirmed, 972 F. 2d 529 (4th cir.1992); See also, *Rodway v. USDA*, 514 F.2d 809, 819-820 (D.C. Cir.1975); *Gutierrez v. Butz*, 415 F. Supp. 827, 830-831 (D.D.C. 1976); *Harley v. Lyng*, 653 F. Supp. 266, 272 (E.D. Pa. 1986).

We understand that the industry groups remain vehemently opposed to any increased regulatory burden on their constituency. We are confident that the industry will provide the agency with data indicating substantial numbers of breeders will be affected if the "number of breeding females" criteria is kept low. However, we have collected some preliminary data which indicate that the numbers of establishments with a relatively low number of breeding females which would come under the USDA's jurisdiction, if the licensing trigger is left at three, is a small minority of the vast numbers of breeders in the country. Thus, it is our strong belief that the overwhelming majority of "hobby breeders" will not be affected by these regulations.

#### SUPPORTING DOCUMENTATION:

In early 1996, the Doris Day Animal League conducted a survey of breeders selling dogs via classified advertising through the *Washington Post*.<sup>1</sup>

Of the 110 classified commercial listings for dogs, thirty establishments were visited by an investigator. The petitioners are confident that few, if any, of those not visited would fall into the category recommended to be regulated by the USDA because, for a variety of reasons, the information that we have on these establishments indicates a small number of dogs on the premises. Of the thirty establishments visited, seven would require licensing under the standard that exempts operations with "three or fewer breeding females." Of these, three or less were enterprises that were substantially "commercial" in nature. Therefore, although dozens of puppies were for sale in the metropolitan area during this period there would be minimal impact, in terms of requiring additional inspections, from implementing the regulatory changes put forward in our comments of May 27, 1997, "Comments Concerning Docket Number 97-018-1."

In addition to this analysis, petitioners have attempted, with limited success, to access the USDA's own records of its enforcement of the Animal Welfare Act with reference to current class A dealers. We were able to obtain data from only two regions, despite the statements of staff that the data were available on the web or through the regional offices. We do thank the two regional offices that quickly responded to our requests, for their assistance in this matter.

Most telling were data from the Central Region, where inspectors found 24 entities in violation of the Animal Welfare Act between 1995 and 1998.<sup>2</sup> Contrary to the statement in the Advance Notice of Proposed Rulemaking that the agency has "determined that the risk of noncompliance with the regulations significantly increases if facilities care for more than 60 breeding female dogs and/or cats," most of the entities with violations had far fewer than 60 dogs on their premises, some as few as 11. Independent investigations by one of the petitioners also revealed significant violations at facilities with small numbers of breeding females.

It is clear, then, that facilities with smaller numbers of animals are not immune from serious problems. The same conclusion can be drawn from the Doris Day Animal League breeder survey previously discussed.<sup>3</sup> In contrast to the negligible increased regulatory burden on the agency that our findings would indicate, we would note the horrendous living conditions for the animals in those facilities that would be newly subject to licensure. Unlike the facilities with three or fewer breeding females, which were nearly universally cases of individuals selling the offspring of their "pets," the animals in the other establishments were housed in squalid outdoor enclosures with minimal shelter and often had limited access to potable water. These are precisely the establishments in need of significant federal oversight and for which the USDA has a responsibility to ensure compliance with the Animal Welfare Act. Once again, these data underscore the importance of the USDA exercising its flexibility to establish enforcement priorities without relinquishing its important legal authority to address violations elsewhere, as needed.

Other information may help the agency realize that the pool of potential licensees is significantly smaller than it anticipates. The Bureau of Labor Statistics (BLS) collects data on the businesses in its Occupational Employment Survey. Animal breeders, including dog and cat breeding facilities, are included under the Standard Industrial Code 0279-

**Animal Specialties, not otherwise classified. Under that classification, BLS found only 790 entities registered in 1996, the most current year for which data are available.\* These data suggest there are an insignificant number of dog and cat breeding establishments of a commercial nature reporting wages to the federal government, indicating an extremely small number of additional establishments likely to require coverage by our proposed expansion of dealer regulations.**

The agency may also be aware of breeder ordinances throughout the country that may give the agency some indication of the numbers of animals in facilities regulated at the local level which could be extrapolated to a national estimate. These cities and ordinances include:

- |  |   |
|--|---|
| 1) <b>Coming, New York</b>             | ordinance requiring regulation of cat breeders.               |
| 2) <b>Kansas City, Missouri</b>        | ordinance requiring permits for more than four adult animals. |
| 3) <b>Camden, New Jersey</b>           | ordinance requiring regulation of dog or cat breeders.        |
| 4) <b>San Mateo County, California</b> | ordinance requiring regulation of dog or cat breeders         |

#### **RECOMMENDATIONS:**

In addition, the petitioners also request the following recommendations be considered by the agency:

- 1) **Prohibit class B dealers from selling animals to research. The USDA has repeatedly stated that it is hesitant to take on more regulatory responsibility because of its limited resources. If the USDA were to vigorously pursue the elimination of the licensing of class B dealers for sale of animals to research facilities, which takes a disproportionate amount of inspection time to regulate, it could reduce the numbers of entities it regulates and, therefore, have more resources available for enforcement in other areas of jurisdiction, such as class A dealers.**
- 2) **Increase the efficiency of its enforcement measures, by reducing the number of precensuring inspections routinely granted under its regulations to one or two. Currently, the USDA allows up to three precensuring inspections. This allows individuals extremely**

likely to cause problems for the USDA to become licensees. If the USDA allowed only one precicensing inspection, with a possible exemption to this rule for specific cases (eg., over 90 percent of the standards are met and no significant deficiencies), but in no instance would allow more than two precicensing inspections, it could significantly reduce its regulatory workload. If an individual fails the precicensing inspection, he or she would be free to reapply for a license a year later.

(3) Consider changing the term "breeding female" in its regulations to "mature intact female." The term "breeding female" is ambiguous because many "hobby breeders" with which we have had discussions claim they have mature adults capable of breeding, but not currently involved in an active breeding program. The term "mature intact female" clearly refers to the physical state of the animal and not to the intention of the animal's guardian. This change would eliminate any confusion for the breeders. The agency should place on the licensees the onus to produce documentation that a mature female is intact or not capable of reproducing.

(4) Initiate an education campaign to promote a complaint line with reference to dealers not complying with the law and establish a relationship with U.S. newspapers to educate the public on the requirements for complying with the USDA regulations.

(5) Become more adamant in its requests for increased funding so that it can comply with the mandate set out by Congress for the enforcement of the Federal Animal Welfare Act. The USDA has repeatedly stated that it cannot properly enforce the Act or take on additional responsibilities due to lack of funding, yet the agency apparently fails to make its point, in compelling terms, to Congress. The animal protection community is extremely supportive of this approach and willing to work with the agency to take up this issue with Congress at the appropriate time.

6) Require USDA licensed facilities to comply with State and local statutes. As the agency is aware, at least seven states exempt USDA licensed facilities from coverage under the state anti-cruelty statute. This means that any animal in a USDA licensed facility has absolutely no protection under the state anti-cruelty statute should deliberate and abusive treatment occur.

In a letter dated June 24, 1996 from Assistant Secretary of Marketing and Regulatory Programs Michael Dunn to Patricia Forkan, Executive Vice President of The Humane

Society of the United States, it was stated, "In brief, the AWA's implementing regulations establish minimum standards for animals used in research or exhibition, sold as pets at the wholesale level, or transported in commerce. State and local governments may also enact and enforce their own animal welfare laws, and these laws may establish more stringent requirements than those set forth in the AWA regulations. Moreover, coverage under the AWA does not exempt registered and licensed facilities from government by State and local statutes, and the Department of Agriculture recognizes the authority of State and local governments to enforce their own animal cruelty laws."<sup>5</sup> We agreed with this assessment and appreciated the clarification.

We urge the agency, as part of any regulatory changes, to state within the regulations that breeders should be required to be covered by state anti-cruelty laws; that there is no reason for a state to assume this coverage should not exist; and that adherence to USDA regulations does not necessarily protect an animal from individual acts of abuse. State anti-cruelty laws and the federal Animal Welfare Act and its regulations are not mutually exclusive; facilities should comply with both.

7) *Maintain cooperation with states, but ensure separate regulatory enforcement of federal regulations and state regulations.* Because enforcement of the Animal Welfare Act has been less than adequate in many cases, several states have enacted their own laws addressing the care provided to animals in breeding facilities. Missouri is an example of this. Yet, the state and the USDA entered into a cooperative agreement to allow the USDA to enforce their state law. This gutted the state effort to increase enforcement. We urge the agency to no longer enter into any cooperative agreements with states under these circumstances. Instead, states and local agencies should be encouraged to assist the USDA in protecting animals.

In conclusion, the petitioners recommend that the agency amend its regulations relating to the licensing of class A dealers, as outlined in our original comments and under the original petition and the subsequent lawsuit filed by the Doris Day Animal League. We strongly believe that the number of "breeding females" qualifying for an exemption should be kept at three. However, in referring to our comments submitted May 27, 1997, under "Comments Concerning Docket Number 97-018-1" the petitioners may accept raising the regulation to no more than five "mature intact females." We stand ready to work with the agency to ensure that these revisions do not become an untenable burden on the agency and



that its enforcement capabilities are not crippled in order to comply with this regulatory expansion.

Submitted on behalf of all petitioners, on this day 24th of August, 1998.



Holly E. Hazard  
Executive Director

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<sup>1</sup> Attachment 1 - Survey of Breeders, *Washington Post* classified ads, January 5, 1996.

<sup>2</sup> Analysis of Attachment 2. Adult Cats and /or Dogs on premises at last inspection. USDA licensed dealers with violations of the AWA 1995-1998. Central Region. Other attachments with this section include analysis of Western and Eastern Region. AWA violations 1995-1998, by license dealers.

<sup>3</sup> See Attachment 1.

<sup>4</sup> Occupational Employment Survey By Industry. Animal specialities not otherwise classified.

<sup>5</sup> Letter to Patricia Forkan, Executive Vice President of The Humane Society of the United States from Michael Dunn, Assistant Secretary of Marketing and Regulatory Programs, USDA, dated June 24, 1996.

**Survey of Breeders  
Washington Post Classified  
January 5, 1996**

110 classified commercial listings for dogs / puppies

45 wrong number / no answer / unable to contact

30 were sold before call placed

6 adult Dogs

30 establishments visited

**Establishments Visited**

CASE NUMBER	NUMBER OF MALE	ADULT DOGS FEMALE	SEX UNKNOWN	NUMBER OF PUPPIES	COMMENTS:
1	1	1		10	
2	1	1		5	
3	-	1		9	
4			Many	20	Picture attached
5	2	2		3	
6	1(?)	1(?)		9	Picture attached
7	-	1		7	
8			Unknown	11	Total of 30 - 35 dogs. Picture attached
9		1		3	
10	1	2		2	
11		Class "B" Dealer		Many puppies - no adults	Picture attached
12		1	(4 other adults, sex unknown)	6	
13			10 adults sex unknown	9	
14	2	2		3	
15	1	3		14	
16	1	2		9	Picture attached
17			Unknown	2(?)	
18			14 adults sex unknown	3	Others already sold
19	1(?)	4(?)		14	
20		1		6	
21			Several	7	Also a "B" dealer

CASE NUMBER	NUMBER OF MALE	ADULT DOGS FEMALE	SEX UNKNOWN	NUMBER OF PUPPIES	COMMENTS:
22	1 (other adult dogs)	1		3	
23		Several		11	
24	2	2	1 unknown	5	
25	40 breeding adults			3	
26	1 Several more adults	2(?)		3	
27			7 (sex unknown)	8(?)	
28	1	5	2 (unknown)	12	
29	1	2	2 (sex unknown)	6	
30	3	8(?)		8	

Attachment #2  
**ADULT DOGS AND/OR CATS ON PREMISES AT LAST INSPECTION**  
**USDA LICENSED DEALERS WITH VIOLATIONS OF THE AWA**  
**1995-1998**  
**CENTRAL REGION**

LICENSE #	NAME	BUSINESS	DOGS	CATS
<b>IOWA</b>				
42-A-533	Ernest Yancy	S & Y Kennel	70	
42-B-020	Ronald DeBruin	Oakview Hunting Club	42*	
42-B-054	Elmer Scherbring	OLD FILE HAS BEEN PURGED FROM RECORDS		
42-B-067	Julian & Anita Toney		127	
<b>MISSOURI</b>				
43-A-780	Dorpha Evans	Dorpha's Kennel	211	
43-A-1829	Leo & Shelda Hovar	Hovan's Doggie World	WRONG FILE SENT	
43-A-1957	Donald & Mary Ruth Schrage	Rabbit Ridge Kennels	330	
43-A-2059	Rose Groll	Golden Ponds	53	
43-A-2337	Lois Stevens	Hilltop Kennel	37*	
43-B-047	Randall B. Huffstutler	Ozark Research Supplier	35	4
43-B-066	Jim & Sue Hughes	Do-Bo-Tri Kennels	11**	
43-B-133	Marilyn Shepherd	Cedarcrest Kennel	233*	
43-B-169	Laura Carpenter		23	
43-B-0247	Donald Foster	White Gate Kennels	118	
43-B-0344	Joy & Lowell Thomas	Thomas Kennel	225	
<b>NORTH DAKOTA</b>				
45-A-052	Betty Hiatt	Maple Valley Kennels	111	
45-A-053	Lila Smith	Dog-Gone Kennels	58	
45-A-068	James & Charlette Uriel	Rocking U Kennel	114	
45-B-0017	Edward & Ann Langeliers	Langeliers Lakeside Kennel	100	
<b>SOUTH DAKOTA</b>				
46-A-018	Bradley & Wanda Bachman	Prairie Kennels	77	
46-A-139	Donna Voeller	Voeller's Kennel	49	
46-B-035	LaVerne & Sandra Baker	LeSan Kennel	17	4
<b>NEBRASKA</b>				
47-A-030	Myron & Barbara Pugh	Oshkosh Kennels	42	
47-A-060	Norman Troster	Dawg Bone Kennel	47	
47-A-174	John Hays	John Hays of Bancroft	43	
47-A-0257	Charles & Carol Sokol	Czech Kennels	38	
47-A-275	Anita L. Krauter	Schwartz Von Krauter K-9's	76	
<b>KANSAS</b>				
48-A-649	Mary Meyers		30	
48-A-1001	Lizann & Jeff Fortin	Beaver Creek Kennels	300*	
48-A-1105	Werner Wallace	Tannen Berg Kennels	23	
48-A-1153	Mary Moore	D & M Kennel	225	
48-B-004	Vivian Box	Dragon Star Kennel	52	
<b>ARKANSAS</b>				
71-A-199	Dora Hampton	Hampton Kennels	25	
71-A-355	Pearl & Homer Byrd	Blue Mist Kennels	120	
71-A-456	Clyde & Goldie Rogers	Rogers T.L.C. Kennel	93	
71-A-511	Gail Davis	Personality Plus Poodles	38	
71-B-030	Gary & Sheila Garner	Fourche Valley Kennels	108	
71-B-108	C.C. Baird	Martin Creek Kennel	348	
<b>OKLAHOMA</b>				
73-B-0018	Billy Holman	Rocky-Cor Kennels	310	
<b>TEXAS</b>				
74-B-064	James Daniel		23**	

**Bolded entries reflect dealers no longer in business**

\* Number of Adults/Puppies not specified

\*\* Puppies Only

**ADULT DOGS AND/OR CATS ON PREMISES AT LAST INSPECTION  
USDA LICENSED DEALERS WITH VIOLATIONS OF THE AWA**

**1995-1998**

**EASTERN REGION**

<b>LICENSE #</b>	<b>NAME</b>	<b>BUSINESS</b>	<b>DOGS</b>	<b>CATS</b>
<b>MASSACHUSETTS</b>				
14-B-002	Katherine T. Finch	Pineland Farm Kennels		
<b>CONNECTICUT</b>				
16-B-010	Robert Chmiel	Pet Paradise		
<b>NEW YORK</b>				
21-A-021	Barbara Coleman	Tombar Kennels		
<b>NEW JERSEY</b>				
22-A-005	Hayat Kassar-Creek	CAMM Research Institute		
<b>PENNSYLVANIA</b>				
23-B-002	Glen G. Wrigley	Buckshire Corporation		
23-B-006	Michael Kredovsky	Bio-Medical Associates, Inc.		
23-B-024	Gregory & Anne Fedechko	South Jersey Biological Farm		
23-B-040	David B. Kanagy	Kanagy Kanine Kennel		
23-B-073	John & Elizabeth Somers	B.J. Birds Eye, Inc.		
<b>INDIANA</b>				
32-B-065	Patrick D. Hoctor	Hoctor's Exotics		
32-B-094	Kellie Stephens	Teay's River Valley Ranch		
32-B-097	Jack Stowers	Sugar Creek Kennels		
<b>ILLINOIS</b>				
33-B-276	Thomas E. Schoenfeld			
<b>MICHIGAN</b>				
34-B-002	Fred & Janice Hodgins	Hodgins Kennels		
<b>VIRGINIA</b>				
52-B-043	William Fitzhugh	Bellona Aersenal Farms		
<b>WEST VIRGINIA</b>				
54-B-002	Mona Hill	Mona Hill's Kernel		
<b>SOUTH CAROLINA</b>				
56-A-026	Bobby Paçk			
56-B-005	David & Lucia Meeks	Hollywild Animal Park		
<b>GEORGIA</b>				
57-B-032	Bruce & Nancy Trammell	Trammell Trail Treasures		
<b>FLORIDA</b>				
58-A-165	Jacqueline Lovelace	Pet Country Club		
58-B-110	Antonio Alentado			
58-B-219	Michael Frewer	World Wide Fauna		
<b>KENTUCKY</b>				
61-B-110	Ron Claxon	Tri-State Biomedical		
<b>TENNESEE</b>				
63-B-101	William J. Hargrove	U.S. Research Farm		

0279 Animal Specialties Not Elsewhere Classified

Establishments primarily engaged in the production of animal specialties, not elsewhere classified, such as pets, bees, worms, and laboratory animals. This industry also includes establishments deriving 50 percent or more of their total value of sales of agricultural products from animal specialties (Industry Group 0277), but less than 60 percent from products of any single industry.

- Alfalfa farms
- Apiculture
- Aviculture (i.e., parakeet, canary, etc.)
- Birds
- Bee farms
- Cat farms
- Dog farms
- Exotic-animal farms
- Frog farms

- Bees production
- Exotic breeding and selling establishments
- Laboratory animal farms (i.e., with rats, guinea pigs, etc.)
- Malacology farms
- With special production and otherwise
- Worm farms

Table 2. Private Industry by 4-digit SIC Industry and government by level of government, 1986 annual averages: Establishments, employment, and wages, change from 1985

Industry/occupat	SIC Code	Average establishments		Average employment		Total annual wages (\$ thousands)		Average hourly wage	
		1986	Change from 1985	1986	Change from 1985	1986	Change from 1985	1986	Change from 1985
Total		7,46,104	148,297	117,582,290	2,076,457	62,416,891,395	3,192,748,746	257	23
Total private		6,88,974	148,428	10,872,281	2,277,897	2,837,234,628	179,487,314	258	22
Agriculture, forestry, and fishing		107,888	4,728	1,277,424	72,188	28,285,708	2,914,481	270	8
Agricultural production, except cash grains	9100	65,487	8	672,748	12,146	2,877,283	458,818	257	9
Cash grains	9110	2,888	128	27,008	2,887	597,251	60,178	257	18
Wheat	9111	1,718	-88	16,888	268	388,888	7,288	222	12
Rice	9112	812	-48	8,888	88	2,888	2,888	242	17
Corn	9113	888	88	8,888	2,888	1,888	2,888	272	24
Soybeans	9114	288	7	2,188	48	8,288	1,188	257	18
Cash grains, nsp	9115	1,888	128	1,788	88	1,788	14,288	258	16
Food crops, except cash grains	9120	8,188	288	7,288	88	1,188,888	27,788	278	8
Cotton	9121	8,188	288	22,177	88	887,887	8,288	278	8
Tobacco	9122	88	88	8,888	88	2,288	8,788	258	28
Supplies and equip. farms	9123	888	27	8,888	88	2,888	1,888	258	28
Farm products	9124	1,888	28	12,888	88	2,888	17,788	258	15
Field crops, except cash grains, nsp	9130	2,888	88	2,888	88	2,888	2,888	258	2
Vegetables and melons	9140	2,778	4	15,288	-1,288	1,887,178	18,288	257	8
Vegetables and melons	9141	2,778	4	15,288	-1,288	1,887,178	18,288	257	8
Fruit and tree nuts	9170	18,288	-88	171,781	8,288	2,278,888	182,788	258	8
Berry crops	9171	1,888	-11	8,888	1,888	28,188	32,188	248	18
Ornamental	9172	2,888	-88	28,178	2,188	2,888	7,888	258	18
Tree nuts	9173	1,888	-88	11,288	288	17,288	8,188	258	8
Citrus fruits	9174	1,888	-88	18,888	-88	28,888	-8,788	258	2
Deciduous tree fruits	9175	8,888	-128	88,288	1,288	78,288	41,788	258	2
Fruit and tree nuts, nsp	9176	1,288	88	11,888	88	17,888	11,888	258	8
Horticultural specialties	9177	8,188	28	188,888	2,877	2,188,188	118,288	258	8
Covered specialty products	9180	7,288	28	148,288	2,288	1,888,288	188,288	258	8
Food crops, grain, other than	9181	888	8	18,888	88	2,888	12,288	258	8
General farm, primary crop	9190	4,888	8	21,188	1,888	2,888	21,888	258	12
General farm, primary crop	9191	4,888	8	21,188	1,888	2,888	21,888	258	12
Agricultural production, livestock	9200	18,888	88	172,888	4,188	2,288,888	182,888	258	18
Livestock, except dairy and poultry	9210	7,288	188	28,188	1,288	1,288,288	68,288	277	12
Beef cattle, methods	9211	888	8	72,188	-18	2,288	1,288	258	18
Beef cattle, except methods	9212	4,888	88	28,288	-88	2,288	4,788	258	18
Hog	9213	1,888	128	18,288	1,888	2,888	5,888	258	18
Dairy and goats	9214	888	88	1,888	-78	2,888	-8,188	258	18
General livestock, nsp	9215	178	88	88	88	1,888	888	258	11
Dairy farms	9220	8,888	88	2,888	1,788	8,188	8,188	258	7
Dairy farms	9221	8,888	88	2,888	1,788	8,188	8,188	258	8
Poultry and eggs	9230	1,888	-8	8,288	-88	2,888	2,288	258	11
Broiler, fryer, and other chickens	9231	888	-8	8,888	-177	8,188	-4,888	258	-2
Chicken egg	9232	888	-8	18,888	18	2,888	17,888	258	18
Turkey and other eggs	9233	888	-8	8,288	88	2,888	12,288	258	18
Poultry hatcheries	9234	888	-8	8,288	-177	18,288	-8,888	258	12
Poultry and eggs, nsp	9235	128	-8	1,888	18	2,888	8,888	258	22
Animal specialties	9240	2,888	88	14,888	88	2,888	14,888	258	8
Fur-bearing animals and rabbits	9241	188	-8	88	88	12,188	1,888	258	-2
Horses and other equines	9242	1,888	22	1,888	88	1,888	4,888	258	18
Animal specialties, nsp	9243	888	18	4,188	18	8,188	8,188	258	18
General farm, primary product	9250	888	-11	4,888	-12	8,188	2,878	258	13
General farm, primary product	9251	888	-11	4,888	-12	8,188	2,878	258	13
Agriculture services	9300	113,578	2,888	227,881	8,288	14,127,288	1,281,888	258	8
All agriculture services	9310	788	-12	4,288	88	18,288	17,188	258	28
Crop services	9320	8,888	88	111,788	2,877	2,888,188	1,881,188	258	27
Crop planting and protecting	9321	2,888	28	18,888	28	2,888	2,788	258	22
Crop harvesting	9322	1,888	18	14,788	88	2,188	2,188	258	21
Crop preparation services (IP except)	9323	1,888	8	18,288	1,888	1,271,578	62,878	258	18
Other (diving)	9324	1,888	8	11,872	-8	2,888	2,888	258	7

See footnote at end of table.