

August 7, 2007

Dr. Holly Stallworth  
US EPA  
Science Advisory Board (1400F)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Dr. Stallworth:

Please accept these additional comments from Illinois Farm Bureau regarding the July 24, 2007 Science Advisory Board (SAB) Hypoxia Advisory Panel Draft Report. Our previous comments were dated June 8 and June 29.

We have concerns with the latest SAB Draft Report dated July 24. Some of the recommendations are not realistic for agriculture in Illinois and would have severe negative ramifications for farmers in our state. Many agriculturally-related groups have expressed opposition with various aspects of the Draft Report, and the fact that there still continues to be unrealistic recommendations in the report is very concerning.

As we stated in previous documents, the Mississippi River Basin is huge and a very complex natural system. Sufficient questions have been raised about the data used in various versions of the Draft Report to strongly point to the need for additional data to evaluate this issue and the solutions. It is imperative that the SAB correct inaccurate information used in the Report and utilize data available from agriculturally-related groups that more accurately depict nutrient use in the basin.

Specifically, we question the following statement made in the Report: Section 4.5.6 (In-field Nutrient Management) contains the statement that there has been a two-fold increase in fall N application from the 1970s to the present in Illinois. This statement is erroneously based on sales information and not actual application information. The Report then makes recommendations based on this unsubstantiated data on page 215 of the Report.

Page 215 of the Report recommends “reducing or discontinuing fall N application for corn...” We disagree with that recommendation and urge that the SAB delete it from the report.

We also disagree with the recommendations to reduce overall nitrogen application by 45% and reduce phosphorus by 40%. The procedures used to develop statements like these are of great concern, and we urge the SAB to reevaluate the data available so that the recommendations are backed by scientific data analysis.

We also have concerns with the continued mention of taxes on page 156 of the Report. Here again, even if the tax is not directed at farmers, the costs will eventually filter down

to those individuals. Farmers cannot pass costs of mandates or taxes along to anyone else.

Our last concern focuses on the time frame by which comments have been due on various Draft Reports. This last document is 318 pages in length. We request that there be an adequate time to comment on the next Draft Report before it is finalized. The recommendations in the Report will have ramifications on agriculture in Illinois and the Midwest, and it is imperative that there be sufficient time to review and comment on the work of the SAB.

Illinois Farm Bureau continues to support the utilization of voluntary best management practices and support incentive-based educational programs with technical assistance to address natural resource issues. It is proven that these types of programs work to help move in a positive environmental direction. We urge the SAB to rewrite the Draft Report so that the recommendations are realistic, utilize scientific data analysis, and are workable for those who will have to implement them.

Thank you for the opportunity to comment on the Draft Report.

Sincerely,

Nancy Erickson, Director  
Natural and Environmental Resources  
Illinois Farm Bureau

Cc: Chuck Hartke  
Benjamin Grumbles