

September 26, 2007

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

Dear Dr. Stallworth:

Please accept these comments from Illinois Farm Bureau regarding the latest Science Advisory Board (SAB) Hypoxia Advisory Panel Draft Report. Our previous comments on Draft Reports were filed in June, July and August of 2007.

We have had concerns with each of the versions of the Draft Report and this latest draft is no exception. Recommendations in this Draft Report are not realistic for agriculture in Illinois and would have severe negative ramifications for farmers in our state. You have received several requests by agriculture groups to gather additional information, clarify sections of the report, and give ample time for those who will be impacted by the Report to adequately analyze the ramifications that implementation of the recommendations would have on agriculture. These comments are still relevant for the current Draft Report since it continues to contain unreasonable recommendations.

Concerns have been consistently raised over the past three months about the data used in various versions of the Draft Report. It is critical that the SAB avoid using assumptions as a base for making recommendations for programs or practices in the basin. Midwest agencies and organizations have raised sufficient questions and outlined rebuttals to information used in the Report. The SAB should now do a careful review of the questionable extrapolations and misleading statements in the Report.

Because of the questionable information in the Report, we are also concerned about the negative economic impact the recommendations would have on Illinois agriculture. Some of the recommendations are not plausible for agriculture and are too far from reality to be attainable or economically-feasible from an agricultural perspective.

Many of the recommendations seem to negate the success that various voluntary incentive-based agricultural programs have had through the years. We continue 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.

The historic challenge is that these voluntary programs for agriculture have been underfunded. Farmers are interested in voluntary programs and are on waiting lists for them. It is incorrect to assume that voluntary programs are insufficient to address natural resource issues and incorrect to jump the conclusion that more of a mandated approach is needed.

Lastly, as we have stated in previous comments, there has not been sufficient time to comment on the Reports. We urge that there be a reasonable comment period with adequate time to analyze parts of the Report and also to provide data to address issues raised.

We urge that the Draft Report be rewritten so that the recommendations are based on scientific data analysis and are reasonable for those who will have to implement them.

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

Sincerely,

Nancy Erickson, Director, Natural and Environmental Resources
Illinois Farm Bureau

Cc: Chuck Hartke
Benjamin Grumbles