



Illinois Fertilizer & Chemical Association

P.O. Box 1326, Bloomington, Illinois 61702-1326 • Telephone: 309.827.2774 • Fax: 309.827.2779 • www.ifca.com

September 28, 2007

M. Granger Morgan, Ph.D., Chair
Chartered Science Advisory Board (1400F)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

RE: Comments on SAB Hypoxia Advisory Panel Report – Request for Extension

On behalf of the members of the Illinois Fertilizer & Chemical Association (IFCA) I am submitting brief comments on the latest version of USEPA’s Scientific Advisory Board Hypoxia (SAB) Hypoxia Advisory Panel report. On behalf of the Illinois fertilizer industry, we are also requesting an extension of the September 27, 2007 deadline for additional stakeholder comments.

IFCA’s membership consists of owners, managers and employees of retail agrichemical facilities located in Illinois, as well as representatives of pesticide, fertilizer and agricultural equipment manufacturers. The majority of IFCA’s 1100+ members are directly responsible for serving the needs of Illinois’ agricultural producers. IFCA is committed to developing and helping implement programs that upgrade and enhance the safe handling and efficient use of agricultural chemicals and commercial fertilizers. Agriculture is without question Illinois’ leading industry with over 20 million acres in our state in crop production, mostly corn, soybeans and wheat.

Comments on Current Draft

We continue to express grave concern with the recommendations in the latest draft relative to the timing of fertilizer application and the cropping systems that are inherent to the economic fabric of Illinois and the upper Midwest. The recommendations calling for major shifts in application practices combined with recommendations for shifts in policies and economic incentives for the planting of certain crops may be viewed by some as a simplistic solution to the issue of Gulf of Hypoxia. However, it is neither simple, nor is it a solution if the ramifications of such recommendations are disregarded from the standpoint of attainability and economic realism.

It is extremely difficult to respond legitimately to the findings and recommendations in this complex report without due process to allow experts in the agricultural field to further examine the arguments and conclusions and apply them to realistic applications in Midwest agriculture.

Given the prospect of this report being used to drive public policy impacting millions of acres of crop production and the lives of tens of thousands who work in this industry not to mention the millions of citizens that depend upon production agriculture for sustenance, we believe that an extension of the comment period is duly warranted. Speaking on behalf of an industry and a State that has dedicated many resources to the improvement of agriculture and protection of the environment, we feel we have the ability to engage more fully in this debate given the time and opportunities for our universities and private sector interests to provide insight and

recommendations that balance the concerns of the Gulf with the equally important concerns of the Upper Midwest.

On behalf of the members of our Association and our colleagues in agriculture and academia, we urge you to allow for ample time for proper review, comment and inclusion of pertinent points of relevance prior to the completion of this report.

Sincerely,

The Illinois Fertilizer & Chemical Association

A handwritten signature in black ink that reads "Jean Payne". The signature is written in a cursive style with a large, sweeping initial "J" and a long, horizontal flourish extending to the right.

Jean Payne
President