



September 24, 2007

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

RE: Science Advisory Panel Report - Hypoxia in the Northern Gulf of Mexico

Dear Dr. Morgan:

The Iowa Farm Bureau Federation (IFBF), the state's largest general farm organization with more than 154,000 members, wishes to once again express its very serious concerns about the Science Advisory Board (SAB) Hypoxia Advisory Panel's final draft report. These concerns have been expressed in two previous comment letters on previous drafts.

These concerns include the report's inconsistency with our organizational policy. Because this is a national issue, the Iowa Farm Bureau is guided on this issue by American Farm Bureau policy. AFBF hypoxia policy says, "We support the right of the state to develop a volunteer plan of action to address the agricultural nonpoint source portion of the EPA's Gulf of Mexico program. We believe the program's goals and objectives can best be administered at the local level through soil and water conservation organizations and farm Groups. Any policies made regarding the Gulf of Mexico hypoxia area must be backed by sound scientific research and give proper consideration to impacts on agriculture production."

What we have seen so far of the report do not seem to be consistent with these policies. The ag nonpoint source recommendations are focused on federal policy implementation, not local, voluntary watershed approaches. In fact, the draft recommendations fly in the face of all of state's historic and current voluntary practices, its management practice realities, and economics with respect to nonpoint source agriculture.

Also, this is a science reassessment report, and the policy recommendations contained in it are not consistent with the panel's charge. Policy recommendations are the responsibility of the Gulf Hypoxia Task Force, not the science advisory panel.

In addition, the management and economic realities faced by Midwestern farmers with respect to fall-applied fertilizer and other management considerations that seem to have been completely overlooked.

As a result of earlier concerns such as these, a panel of scientists convened by Iowa State University in Ames has now raised more than 50 specific concerns and questions about the science report. We anticipate that the university will forward these concerns to you and they will speak for themselves. However, if these issues are not addressed, the SAB risks losing complete credibility with the public and our membership. This will surely undermine any serious future efforts to address nutrient issues in the Gulf and the Midwest.

So that the SAB can address these concerns thoroughly and thoughtfully, the IFBF asks that the public comment period be extended beyond the current Sept. 27 deadline to allow additional stakeholders and communities affected by the report to review and comment.

We also ask that the science panel be re-convened to review and consider the comments of all that expressed their concerns during the public comment period established by the Federal Register notice of August 30, 2007. It's important that the panel review the public comments and incorporate the new relevant information into the report.

With this information in mind, the IFBF once again asks the SAB to focus its efforts on the reassessment of the original hypoxia science, to remove the economic policy recommendations, and to leave all other policy recommendations to the Mississippi River/Gulf of Mexico Watershed Nutrient Task Force. Also, please reconvene the science panel and allow an additional 90 days for others to comment.

Sincerely,

A handwritten signature in black ink that reads "Rick Robinson". The signature is written in a cursive, flowing style.

Rick Robinson
Environmental Policy Advisor