



September 20, 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 Draft Report
Hypoxia in the Northern Gulf of Mexico

Dear Dr. Morgan:

Hypoxia in the northern Gulf of Mexico is an important issue that the recently released draft report by the Chartered Science Advisory Board's science panel has the potential to address comprehensively. However, I have concerns that the tight deadlines associated with the report will not allow time for a full review and completion of comments by interested parties.

As a result, I ask that the public comment period be extended beyond the current Sept. 27, 2007 deadline to allow additional stakeholders and communities affected by the report to review and comment.

I also ask that the Chartered Science Advisory Board re-convene the science panel to review and consider the comments forthcoming during the public comment period established by the Federal Register notice of August 30, 2007. If the report is going to reflect the additional expertise received during public comment, I think it's important that the panel be brought together again so they can review the public comments and incorporate relevant information into the report.

I recognize the important science contributions of the Hypoxia Advisory Panel, in preparing the draft report and appreciate the very considerable effort by all panel members and staff in developing the draft report.

However major concerns with the draft report include the assessments of the environmental impacts of the nation's commitment to bio-energy resources, seasonal applications of crop nutrients, and the critical relationships between crop fertility and sustaining soil quality to maintain future production of food and fuel and avoiding unintended consequences of larger, future environmental concerns.

Major efforts are underway to conduct science reviews of the draft report by leading researchers and scientists on agricultural nonpoint source landscapes within the U.S. corn belt and Mississippi River Basin, including

- College of Agriculture and Life Sciences, Iowa State University
- Agricultural Research Service, USDA
- Department of Crop Sciences, University of Illinois
- Agronomy Committee of the Illinois Fertilizer and Chemical Association

It is critical that these science communities be heard from, in addition to the technical and science representatives and advisors to stakeholder organizations. While there were preliminary versions of the report briefly made public a few days prior to meetings of the advisory panel, the current report draft, which is 300 pages, is the first version released for public review that reflects consideration by the full panel in entirety and is properly referenced for science review.

This report will stand into the future as the science foundation to guide efforts towards environmental improvement of the Gulf and Basin. As a member of the Mississippi River/Gulf of Mexico Watershed Nutrient Task Force for which EPA requested this science review, I trust that you and the Chartered Science Advisory Board agree that reducing hypoxia in the Gulf of Mexico and addressing water quality concerns in the 41% of the U.S. within the Basin are objectives which are too important to current and future environmental stewardship, to truncate by not devoting a few additional weeks to further consideration of the critical science reviews underway through re-convening the science panel and extending the public comment period.

I urge you to allow full review and comment before the completion of this report.

Sincerely,



Bill Northey
Iowa Secretary of Agriculture

c.c.: Stephen L. Johnson, Administrator, EPA
Benjamin H. Grumbles, Assistant Administrator for Water, EPA