

June 8, 2007

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

Dear Dr. Stallworth:

Please accept these comments from Illinois Farm Bureau regarding the Science Advisory Board (SAB) Hypoxia Advisory Panel Draft Report. We will submit additional comments on the draft report in the near future.

Illinois Farm Bureau is a voluntary, grassroots organization whose members include about three-fourths of the farmers in the state of Illinois. We support voluntary, incentive-based programs for agriculture to address natural resource issues. It is proven that these types of programs work to help move in a positive environmental direction.

The Mississippi River Basin is huge and a very complex natural system. It is vital to look at all aspects of the system to gauge interconnections within the system. The report should ensure that it looks at broad issues involved with the basin and not get too narrowly focused on one aspect. A narrow approach will only lead to incorrect assumptions and conclusions.

We have several initial concerns with the draft report.

One of the main concerns we have with the report is that it focuses on recommendations for economic policy changes. It is not the charge of the SAB to make recommendations to policy. The SAB is a science-based group not a policy group and any reference to policy options should be deleted from the report.

Page 126 of the report indicated that “deciding who pays is not a question that can be addressed by science.” However, that is what has been done throughout the report, and, in many instances, individual farmers will be the ones who would pay for recommendations listed in the draft.

Illinois Farm Bureau is opposed to taxes or to mandates placed on agricultural practices. Even if the tax or mandate is not directed at farmers, the costs will eventually filter down to those individuals. Farmers cannot pass the cost of mandates or taxes along to anyone else. Farmers are also price takers and not price makes, meaning that they do not set the price that they receive for their crop.

Through the years, it has been proven that voluntary incentive-based programs work for agriculture. The challenge is that these voluntary programs for agriculture have been underfunded and understaffed. It is therefore not logical to assume that taxes or

mandates are needed for agriculture. These types of statements incorrectly imply that voluntary programs are not working. The truth is that farmers are interested in and are on waiting lists for voluntary programs but these programs have not been adequately funded. Therefore it is incorrect to assume that voluntary programs are insufficient to address natural resource issues. It is also incorrect to leap to the conclusion that mandates and taxes are needed.

Page 126 of the draft report states that there are lower than expected environmental results for voluntary agreements, although the programs cited in the report are “largely outside the realm of agriculture.” The report then states that even if the programs used as examples are outside the realm of agriculture, the conclusions made about the effectiveness of voluntary programs “are relevant.” We disagree. If you are looking at the effectiveness of agricultural programs, non-agricultural programs should not be used as examples to draw conclusions.

The report should also use information from the Midwest and not other sections of the country to draw conclusions about the Midwest. Each watershed is different and each part of the country is different. While some Midwest researchers were contacted by the SAB, more information from the Midwest should be gathered and plans or recommendations should not be based on programs from other parts of the nation whose watersheds are different from the Midwest.

Additional emphasis on monitoring and evaluation would be a positive way to determine what strategies would be advantageous for various Illinois watersheds. The report also cites 1993 research on corn response to nitrogen applications (figure 51, page 281). It is critical to use the most recent data possible in a report such as this one. In the last 14 years, there have been significant changes in crop management and corn hybrids. Any recommendations must be backed by current sound scientific research and should give proper consideration to impacts on agriculture production.

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