



Illinois Fertilizer & Chemical Association

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June 29, 2007

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

RE: Comments on SAB Hypoxia Advisory Panel Report

On behalf of the members of the Illinois Fertilizer & Chemical Association (IFCA) I am submitting comments on the USEPA's Scientific Advisory Board Hypoxia (SAB) draft Hypoxia Advisory Panel report.

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.

Other organizations who have submitted comments on the SAB have done an excellent job outlining the concerns that we have with generalizations being made with regard to complex interactions that occur in the nutrient cycle and hydrologic systems. Specifically, we concur with the comments submitted by The Fertilizer Institute and by the Illinois Department of Agriculture. Both of these documents do an excellent job pointing out sections of the report that contain statements and draw conclusions that are not fully supported by the full body of research on these particular topics.

SAB Recommendations

While the SAB report is incredibly complex, some of the conclusions and recommendations made in certain sections are adversely simplistic. Specifically, the suggestion that nitrogen and phosphate fertilizer applications be directly reduced by 40-45% implies that there will be a direct reduction in the scope of the hypoxia zone. If that were the case, and if agriculture were truly the main source of the problem, then the zone should have demonstrated reductions as crop yields and nutrient uptake have increased by nearly 75% since 1980 while agricultural nutrient application has remained stagnant. Our land grant university system in the Midwest has frequently reported that many agricultural acres in Illinois are deficient in phosphorus and potassium levels; therefore

we challenge the conclusions that agricultural phosphorus is a leading contributor to the hypoxic zone when in reality the increasing crop yields and plant uptake of soil nutrients into biomass have actually been “mining” phosphorus in many regions of the Midwest.

According to U.S. Department of Agriculture, farmers are using fewer nutrients with the greatest efficiency in history. Between 1980 and 2005, U.S. corn production increased by 74%. Meanwhile, farmers’ use of nitrogen fertilizer on corn increased only 3%, while use of phosphates fell 20% and potassium fell 24%. This is an incredible return on investment and only continues to improve as new crop hybrids consistently become more nutrient efficient. One has to question how our industry can possibly reduce application rates by 40-45% given the tremendous efficiencies already evident in the crop production system. Nutrients must be applied at agronomic levels to maintain soil fertility. Any effort to dramatically reduce nutrient application would dramatically impact crop yields and only force additional land into cultivation to replace the grain lost due to inadequate yields caused by inadequate soil fertility. This would lead to an entire new set of problems unrelated to hypoxia. Problems such as collapse of the agricultural and rural economy in the Midwest and implications in the national and global grain and food marketplace. Again, we challenge the recommendations of the SAB calling for dramatic changes in land use because these policies would override many complex economic considerations relative to production agriculture in an effort to “solve” the hypoxia issue.

Best Management Practices

The IFCA has long been a proponent of best management practices regarding the application of nutrients for crop production. For the past 10 years the IFCA has played a significant role in nutrient management projects developed and implemented by the Illinois Council on Best Management Practices (CBMP). The CBMP website is located at <http://www.cbmp.uiuc.edu/> and explains our mission and current projects.

Since 2001, CBMP has itself financed, and secured additional grant money for, incentive programs for producers to adopt BMPs relative to nutrient application. In the Lake Bloomington watershed in central Illinois, CBMP enrolled 12,331 crop acres in a program where farmers were rewarded financially for writing and implementing a nutrient management plan based on the recommendations of the University of Illinois Agronomy Handbook. Proper nitrogen and phosphorus rates and timing of the applications were rewarded with per acre payments as were some of the costs of soil testing and utilization of nitrogen stabilizers. Participation by local farmers has been phenomenal and we are also cooperating with the City of Bloomington and the local Soil & Water Conservation District to measure the impact of this BMP program on water quality in Lake Bloomington. Results have been positive to date, but still indicate that the nutrient cycle is complex because so many variables exist including rainfall, contributions from natural background as well as from nearby septic systems, etc.

In addition to the Lake Bloomington nutrient management project, CBMP has also secured funding from USEPA for a similar project in the Friends Creek watershed in central Illinois. This nitrogen best management program enrolled 15,968 acres over a

three year period from 2004-2007, offering a per acre incentive to producers to use the proper nitrogen rate and to stabilize all fall applied nitrogen.

Recommendations

Based on the success and interest in these projects, we believe that producers are very willing to adapt to voluntary best management practices and each year the awareness of the proper rate, timing and application method of nitrogen, phosphorus and potassium increases. Particularly as fertilizer prices have increased, producers are taking a much more scientific approach to nutrient management and we believe strongly that this trend will continue. Voluntary approaches encourage producer participation and acceptance, while historically, government mandates to control crop input practices are viewed with cynicism and resistance. It is in the best interest of producers to apply optimum nutrient rates and do all they can within their ability to make sure the nutrients are available to the plant, and not over-applied. Ideal weather and growing conditions, however, can never be assured and that is a variable that must always be respected when working with producers to adopt BMPs.

Regarding nutrient management policies, we believe it is inappropriate for the SAB to recommend that farm policy be altered to deter producers from planting corn and instead promote perennial crops or provide incentives for land to be taken out of production. It is the role of Congress to determine farm policy based on the needs of the society and constituents. We recommend that the SAB focus solely on presenting the best science and research available in this report and to refrain from drawing conclusions and making recommendations that call for a reduction in nutrient application and drastic changes in USDA farm programs.

We appreciate the opportunity to comment on the SAB report. We also acknowledge the tremendous amount of work that the panel has undertaken to prepare this report. IFCA is willing to present additional information on the success of our locally based BMP programs. We ask the SAB to continue to consider the reality that these programs are becoming more widespread and effective, and are among the best solutions to securing proper nutrient utilization without damaging the agricultural economy and the world's growing demand for food, fiber and fuel.

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, looping initial "J".

Jean Payne
President