



"Improve the economic well-being of agriculture and enrich the quality of farm family life."

August 10, 1999

Gulf of Mexico Hypoxia Working Group
National Center for Coastal Ocean Science
WS 13446 SSMC4
1305 East-West Highway
Silver Springs, MD 20910

RE: Comments on the National Science and Technology Policy Committee on Environment and Natural Resources (CENR) Gulf of Mexico Hypoxia Assessment

Please accept these comments from Illinois Farm Bureau® (IFB®) regarding the National Science and Technology Policy Committee on Environment and Natural Resources (CENR) Gulf of Mexico Hypoxia Assessment. Illinois Farm Bureau is a voluntary, nonprofit organization whose members include about three-fourths of the farmers in the state.

Illinois Farm Bureau supports the use of voluntary best management practices and feels that public policy should be based on sound scientific data gathered through unbiased research.

We have major concerns with the CENR assessment report.

Biased Hypothesis:

The reports should have been a complete and comprehensive analysis of the causes of hypoxia. Instead we found that the assessment began with a biased hypothesis that the hypoxic zone in the Gulf of Mexico was caused by nutrients coming down the Mississippi River.

Because the assessment incorrectly leaped to that conclusion, the solution to the identified problem then narrowly focused on how to reduce nutrient loading of the Mississippi River. We are extremely surprised that such a report would ignore sound scientific procedures.

Issue is More Complex than Presented in the Reports:

Because of incorrect assumptions, many issues related to hypoxia were not adequately studied or evaluated.



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The hypoxic zone in the Gulf of Mexico is a very complex issue. It deserved a far more comprehensive and thorough analysis than was found in the CENR report. Any policy developed solely because of these reports will be as one-sided as the reports are.

A much more comprehensive, unbiased analysis of this issue needs to be done. Issues such as increasing urban populations in the basin, air deposition, mineralization of organic nitrogen and dynamic forces in the basin, the Gulf and along the coast are among issues that need to be further analyzed.

Good Data is Lacking:

The reports should have also used good data that is currently available. One such example is that according to the United States Geological Survey (USGS) nitrate-nitrogen loadings have decreased since 1983 in the Mississippi. This 15-year downward trend flies in the face of statements that correlate a hypoxic zone with increased nitrate loading.

Also, it is our understanding that the total fluxes of nitrogen from the Mississippi River basin have decreased in recent history. The reports need to acknowledge this data.

Economic Impacts:

Even if you incorrectly assume that nitrogen is the only issue related to the hypoxic zone, the report found no direct, measurable benefits to the Gulf fisheries in reducing nitrogen loadings in the Mississippi River Basin. In fact, fisheries can benefit from the influx of nutrients.

On the other hand, there could be a negative impact on agriculture if mandates were placed on fertilizer usage to achieve the main goal of reducing nutrients that is outlined throughout the report.

Agriculture is now experiencing an economic crisis that is relatively unfelt by the rest of society. When mandates are placed on agriculture, farmers do not have the opportunity to pass increased costs of production along to anyone else. Farmers have no choice but to absorb increased cost brought about by regulations.

One-size-fits-all mandates, such as those that are discussed in the reports, fail to recognize the variances found from one farm to another. Circumstances beyond a farmer's control, such as the weather, can make it extremely difficult to comply with mandates. Mandates do not give farmers enough flexibility to deal with the uncontrollable, variable conditions with which they have to contend. Mandates can also place severe economic burdens on farmers.

Future Policy Needs to be Workable:

Agriculture has shown over the years that voluntary best management practices work. For example, there has been a 30% reduction in soil erosion in Illinois from 1982 to 1992. Illinois farmers saved about 90 million tons of soil from 1992 to 1997 by using good conservation practices.

Voluntary programs through USDA and the State of Illinois have provided incentives and technical assistance to producers to increase positive environmental trends. Often, however, these programs are not adequately funded. Initiating and implementing regulations takes more funding away from these workable, educationally-based programs.

These types of voluntary programs also enhance local watershed efforts that are being implemented to address natural resource issues. Local watershed programs help natural resource issues move in a positive direction.

We feel it is increasingly important that programs be based on sound scientific information to make those programs and policies workable. This information and data should be gathered through comprehensive analysis and research of issues.

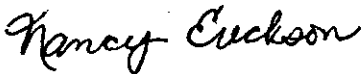
Summary:

It is vital that the information and analyses done on hypoxia be as comprehensive and unbiased as possible. We are concerned because the CENR reports may be a basis for the creation of policy that would not be workable for agriculture.

We urge that a more in-depth, comprehensive analysis of the hypoxia issue be done to help ensure that policies are workable and therefore effective.

Thank you for the opportunity to comment on the report.

Sincerely,



Nancy Erickson
Director of Natural and Environmental Resources

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