IOWA FARM BUREAU FEDERATION
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July 28, 1999

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

RE: White House Committee on Environment and Natural Resources Hypoxia Assessment

Thank you for the opportunity to comment on your recent hypoxia assessment. Nutrient management is an extremely important issue for Iowans, particularly Iowa farmers. In fact, agribusiness, commodity groups and the Iowa Farm Bureau Federation recently reconvened the Iowa Nutrient Management Task Force to examine a number of nutrient management issues, including hypoxia. This group will examine progress on particular nutrient management issues since the task force issued a report and recommendations nine years ago. The task force will also make recommendations for future nutrient management strategies that the individual organizations will work to implement.

With this in mind, our first comment is that the local level is the appropriate place to discuss nutrient management strategies and policies. While the Committee on Environment and Natural Resources (CENR) hypoxia assessment provides a great deal of information and data to be considered and specific recommendations on strategies and polices to deal with the issue, the discussion about the applicability of these recommendations should first begin at the state and local watershed level.

In order to have the appropriate time to at least begin this discussion, the comment period should be extended for at least another 60 days. The comment period that has been provided is inadequate given the complexity of this important issue and the potential impact on the agricultural economy. We request that you extend the comment period for another 60 days to allow for adequate time for industry review of the assessment.

In addition, preliminary review of the six reports, and the scientific literature, lead us to reject the hypothesis that hypoxia in the northern Gulf of Mexico has accelerated in the last 50 years due to a doubling or tripling in the fluxes of nitrogen and phosphorous from the Mississippi River Basin (MRB), primarily from the use of inorganic fertilizer. By using the holistic methodology identified by the CENR in its own report on "Setting a New Course for Coastal Ocean Science," we find that the fluxes of nitrogen and phosphorous from the MRB to the northern Gulf and the

rate of primary productivity in the northern Gulf has declined over the past 50 years, even though the use of nitrogen and phosphorous fertilizer has increased.

Also, the reports lack a credible, scientific, conceptual framework for addressing the causes and remedies of hypoxia. The assessment is narrowly focused on dissolved nutrients and, even prior to the assessment, the solution to the problem had been defined as a reduction in the load of dissolved nutrients carried by the Mississippi River. The structure and scope of the assessment is even inconsistent with the methodology identified by CENR in its own report. This report, developed by consensus among federal science agencies, the university community, and natural resource managers, recommends a comprehensive, integrated, systems approach to address the complexities associated with the degradation of coastal ocean quality. This approach includes recognizing the heterogeneous and highly dynamic nature of coastal ecosystems and the need to address in a thorough manner freshwater, suspended solids, sediments, terrestrial organic matter, the loss of wetlands, pollution, and land-use changes, as well as dissolved nutrients. In addition, the assessment does not address the probable negative impacts on the rich commercial and sports fisheries in the northern Gulf of a reduction in nutrient loads.

A more thorough analysis of the recommendations must also be completed. Recommendations such as the use of treatment wetlands, while based on some preliminary work by Dr. William Crumpton at Iowa State University, and others, deserves continued discussion. The use of constructed or restored treatment wetlands on a large scale has not been demonstrated, nor adequately evaluated in terms of the policy's impact on private property ownership, it's impact on state resources, and coordination with federal conservation programs.

In particular, recommendations for fertilizer restrictions and/or taxes are not justified or supported by fact. There is no cause and effect relationship demonstrated by the assessment, or any other known science, between a 20 percent mandated cut in agricultural nutrient loadings and any improvement in the short run in water quality. These kinds of recommendations have serious economic consequences for farmers and their communities. They must be fully evaluated, especially when economic conditions are already very serious for farmers.

The National Soil Tilth Laboratory in Ames says there may be a correlation between hydrology in the watershed and total nutrient loadings. However, given the complex relationship between watershed hydrology, established drainage systems and productive soils in Iowa, any policy choices must be fully discussed and considered by watershed residents and scientists before federal conclusions are reached.

We do support continued opportunities for voluntary education and demonstration of best management practices that protect water quality. Iowa farmers have made great strides in soil conservation and efficient use of nutrients. With continued use of voluntary programs using best management practices and cost-share assistance, Iowa farmers will make even more progress. Progress to date includes the following highlights:

- Corn researchers continue to produce hybrids that increased yield and increased their ability to use nitrogen fertilizer. In fact, the number of pounds of nitrogen fertilizer applied to grow

a bushel of corn has declined 22 percent from a high of 1.31 pounds N/bushel produced in 1984, down to 1.02 pounds N/bushel in 1998.

- Iowa has established an estimated 150,000 acres of conservation buffers of grass and trees. These buffers help improve water quality in our lakes and streams. Iowa has more farmers with continuous CRP than any other state, with one of every 10 landowners participating.

- By 1992, Iowa farmers had applied conservation practices to save 100 million more tons of topsoil than in 1982 – enough to fill a convoy of dump trucks 105 feet wide, parked bumper to bumper from Council Bluffs to Davenport.

This success is a direct result of "the Iowa model" for conservation programs, using voluntary education, information and demonstration. The Conservation Districts of Iowa, Iowa Department of Agriculture and Land Stewardship, Natural Resources Conservation Service, the DNR, ISU Extension, and commodity, farm and agribusiness groups and others are committed to the Iowa model.

In summary, this assessment provides a starting point for continued discussion. However, given the complexity of the issue and the unknown effects of the various policy choices, extreme care must be taken to allow adequate time for consideration and further research. Premature decisions may have serious irreversible consequences for watershed residents. We are opposed to any decisions based on inadequate information available and time for consideration at this time.

Sincerely,

Roy Bardole.

Roy Bardole, Chairman
The Iowa Nutrient Management Task Force
- Agribusiness Association of Iowa
- Iowa Cattlemen's Association
- Iowa Corn Growers Association
- Iowa Dairy Products Association
- Iowa Farm Bureau Federation
- Iowa Pork Producers Association
- Iowa Poultry Association
- Iowa Soybean Association
- Iowa Turkey Federation