December 20, 1999

Gulf of Mexico Hypoxia Working Group
National Oceanic and Atmospheric Administration
National Centers for Coastal Ocean Science
Room 9127
1305 East-West Highway
Silver Spring, MD 20910

RE: Comments on the Integrated Assessment of Hypoxia
In the northern Gulf of Mexico

The undersigned agricultural organizations submit these comments on issues presented in the Integrated Assessment of Hypoxia in the northern Gulf of Mexico.

We represent a vast array of agricultural interests, all of which have a vested and demonstrated concern about our environment. We have a long history of implementing conservation and other stewardship practices. We represent the majority of privately held land in the Mississippi River basin, and strongly believe that successful plans to reduce nutrient losses to the environment will be built on current practices and programs which are voluntary and incentive-based.

While the integrated assessment attempts to draw a simple picture of the causes, consequences and cures for hypoxia, a close reading reveals a more complicated scenario. Data provided in the report indicates that nutrient loads to the river are a contributing factor to hypoxic conditions, not a directly correlated primary cause of hypoxic conditions. In fact, there are many factors that play a role in the incidence and extent of Gulf hypoxia. An action plan that deals with one factor – nutrient enrichment – will be unlikely to significantly reduce Gulf hypoxia. Further, we strongly urge that this report be revised with a critical eye toward the use of proper terminology and consistent units for the following data elements: nutrient inputs to the soil, edge-of-field nutrient load lost to the river, and nutrient loss reductions.

While we believe the assessment should more accurately reflect the multiple contributors, we do not believe corrective action needs to be delayed. In fact, our members have been and are involved in implementing water quality protection measures each and every day. These actions take the form of an array of best management plans that farmers implement to become more efficient and productive in their farming operations. Farmers have an

economic self-interest in reducing nutrient losses. Nutrient loss reductions are direct cost-savings for farmers. That's why farmers are continuing to use soil tests, fertilizer timing and placement methods, nutrient management plans and other BMPs to make maximum use of all nutrient sources. The widespread adoption of conservation tillage practices has helped reduce nutrient loss.

The integrated assessment provides evidence these efforts are working. Figure 2.6 shows outputs, or production, in the basin has been climbing even faster than inputs, leaving less residual nitrogen in the basin. This declining trend in residual nitrogen is a result of farmers implementing practices that make them more efficient. This is a success story that should be heralded and built upon in the action plan.

The Action Plan should build on existing, voluntary, incentive-based program to address nonpoint source pressures rather than rush to place blame in order to justify a regulatory program. As outlined in the integrated assessment, there are several federal incentive programs available to help farmers control nutrient runoff. These include the Conservation Reserve Program, Conservation Reserve Enhancement Program, the Conservation Buffer Initiative, the Wetlands Reserve Program, and the Environmental Quality Incentive Program. An action plan that successfully reduces nutrient loss will build on these existing, incentive-based federal programs as well as voluntary BMPs being implemented by farmers out of their own self-interest. Nutrient loss is a field-specific problem; it will be reduced through farmer education, technical assistance and conservation incentives, leaving them the flexibility to make site-specific management decisions in conjunction with the local public and private advisors. National regulatory measures such as those suggested in the integrated assessment will not be effective and may unintentionally undermine existing, successful water quality improvement initiatives.

The integrated assessment contains many proposals for increased research and monitoring efforts, and we support these proposals. Increased research into the effects and causes of hypoxia and the impact of agricultural practices on water quality will build a better base of understanding of what can and should be done about hypoxia. Increased monitoring is essential to understanding the long-term benefits of these practices.

We in the agricultural community are committed to more efficient nutrient use, which will reduce the incidence of nutrients in water. We continue to support voluntary, incentive-based programs that help farmers adopt these types of practices. We hope the action plan will be built on current voluntary programs that are successful, and not suggest new, regulatory requirements. We continue to call for representation of private agricultural interest in the development of the

final Integrated Assessment and the Action Plan, as required under section 603 (c ) of Public Law 105-383.

Sincerely,

Agricultural Retailers Association
American Farm Bureau Federation
American Soybean Association
National Association of Conservation Districts
National Association of Wheat Growers
National Association of State Conservation Agencies
National Association of State Departments of Agriculture
National Cattlemen's Beef Association
National Conservation Buffer Council
National Corn Growers Association
National Cotton Council
National Council of Farmer Cooperatives
National Milk Producers Federation
National Pork Producers Council
The Fertilizer Institute