



**NATIONAL CATTLEMEN'S BEEF ASSOCIATION**

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August 12, 1999

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

RE: Comments on Scientific Reports For An Assessment on the Issue of Hypoxia

The National Cattlemen's Beef Association is pleased to comment on the six topical scientific reports requested by the National Science and Technology Council's Committee on Environment and Natural Resources (CENR) for an assessment on the causes and consequences of hypoxia in the Gulf of Mexico. NCBA represents the many cattle feeders and family ranchers, all of who have a stake in protecting the environment.

Initiated in 1898, NCBA is the marketing organization and trade association for America's one million cattle farmers and ranchers. With offices in Denver, Chicago and Washington, D.C., NCBA is a consumer-focused, producer-directed organization representing the largest segment of the nation's food and fiber industry. As representatives of family farmers and ranchers with a vested interest in protecting the environment, we are pleased to provide the following comments.

The cattlemen are strongly committed to addressing water quality challenges today and in the future through sound science based management practices. Programs initiated in the 1985 Farm Bill and its successors that provide technical and financial assistance to facilitate implementation of best management practices (BMPs) have resulted in environmental and water quality improvements.

Many cattle producers are currently participating in state and federal regulatory programs that address many of the potential water quality issues discussed in these reports. Others not required to be permitted under The Clean Water Act are participating in nutrient planning, habitat conservation and conservation programs to better the environment and water quality.

NCBA always encourages our members to only participate in programs based on sound science that are proven to protect the environment through actual on the ground monitoring and analysis. We do not support one-size-fits all regulatory programs for environmental protection.

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These documents look at land use and make a direct correlation to nitrogen loading based on modeling and not actual water samples. Land use in the Mississippi watershed cannot be directly linked to all nitrogen loadings. Thus, we disagree with the conclusion and approach taken that a set percentage reduction in nitrogen use will accomplish the goal of reducing hypoxia. This is exactly the type of one-size-fits all approach that is forced down upon states that we discourage.

Farmers and ranchers want a voluntary, cooperative effort to ensure that the actions we take will result in protecting the environment. Farmers have not only an obligation to protect the environment because they will pass this land on to future generations but also an economic self-interest to maximize production by getting the most production out of the least amount of output. Thus, the assumptions that producers are over applying nutrients would be counterproductive.

NCBA supports science based programs that help America's cattlemen build upon the ongoing progress in improving water quality. Thank you for this opportunity to comment and we hope you take our comments into consideration.

Sincerely,

A handwritten signature in cursive script that reads "Brice Lee".

Brice Lee  
Chairman  
Property Rights and Environmental Management Committee  
National Cattlemen's Beef Association