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Gulf of Mexico Hypoxia Working Group
National Oceanic and Atmospheric Administration
National Centers for Coastal Ocean Science
Room 9127
11305 East-West Highway
Silver Spring, MD 20910

RE: Comments on the Integrated Assessment of Hypoxia in the Northern Gulf of Mexico

I am pleased to submit these comments on the Integrated Assessment of Hypoxia in the Northern Gulf of Mexico on behalf of the National Corn Growers Association (NCGA). NCGA is a federation of 25 state associations and 19 checkoff boards representing 29,900 grower members across the Corn Belt. On average, 78 million acres are planted to corn in 48 states across the United States annually, representing approximately 30% of the total row crop acreage harvested in this country. Corn has a variety of end uses, including animal feed, as well as industrial uses such as corn sweetener, cornstarch, fuel ethanol and beverage alcohol.

Corn growers have always realized the importance of wise use of natural resources. Toward that end, NCGA has sponsored stewardship programs devoted to conservation of soil and water resources. The Conservation Buffer Initiative, for example, promotes the planting of buffer strips to conserve soil and water resources while protecting crops, reducing wind erosion, and creating habitat for wildlife. This program, which began in 1997, is important in that it marks the first cooperative agreement between USDA and a national commodity group designed to reach growers at the grassroots level. NCGA also encourages stewardship through various watershed programs, promotion of best management practices, and research into making the corn plant itself more environmentally friendly. Fundamentally, corn growers believe that environmental results can be achieved more effectively through stewardship and voluntary programs than through additional regulation.

NCGA is supportive of voluntary incentive-based programs to improve water quality and maintain productivity of our land. One of NCGA's primary goals is to be good stewards of our land. With this philosophy in mind, it is vital that hypoxia

discussions not pit the interests of fisheries and shrimpers against farmers. NCGA urges that primary consideration be given to voluntary efforts. Voluntary programs, providing technical assistance and resources to growers is the most effective way to elevate adoption of conservation practices. Understanding must be given to a grower's financial situation and the ability or restraints on altering farming practices.

Throughout the Integrated Assessment, various scenarios for alteration in land management will have a significant impact on growers. Any change in practices, be it nitrogen application, wetland restoration, alteration of tiles, and /or alteration of cropping systems, are costs borne by the grower. Not only are there implementation and maintenance costs, but the loss of productive land has a significant impact on a grower's bottom line. This cost rests solely on the grower. A farmer does not have the option to pass along regulatory costs to a processor or consumer.

U.S. farmers' success in agricultural markets is based on low cost production and the ability to deliver a commodity to the world market in the most efficient, cost-effective manner. Significant changes in production structure (increased requirements on growers) put American agricultural products at a significant disadvantage in world markets. NCGA monitors our competitor's agricultural production closely, and is concerned that significant changes in farming practices may shift our domestic and foreign markets in favor of our competitors.

The Integrated Assessment does note information provided by the Fertilizer Institute regarding nitrogen application, but NCGA would like to stress that changes in agriculture are taking place rapidly. NCGA is involved in research to make the corn plant more environmentally friendly, through innovations such as: the identification of genes to make the plant more digestible for livestock thereby producing less waste; making the plant more drought resistant; making the plant resistant to disease; and improving nutritional value. Also corn yields have increased over the last 60 years due to ongoing research and improving genetics. Through this important research, growers can produce higher yields using less inputs and reducing stress on the environment.

While most water quality programs are interrelated, NCGA feels that the charge of this task force was to evaluate hypoxia, and not speculate about the TMDL process. Any situation summary or recommendations with regard to hypoxia in the northern Gulf of Mexico should not be based on what might be needed for TMDLs. Recommendations must also take into consideration all sources of nutrient input and mitigation throughout the Mississippi River Basin, not solely the upper portion of the basin.

It is vital that the recommendations based on this Integrated Assessment fully account for the impact on US agricultural production. Growers have a long and

successful history of working with the USDA on voluntary, incentive-based programs. These programs must be given the opportunity to work to their full potential prior to additional requirements on farmers. Environmental improvements that have been made as result of programs implemented in the 1996 Farm Bill must be taken into account. Due to the significant time lag in the adoption of conservation practices and direct water quality improvements, current activities of growers must be factored into the assessment. Any future recommendations must also factor in this time for results and be cautious of overburdening growers with requirements because immediate results are not apparent. Finally, the significant lack of direct data regarding conservation practices and specific water quality improvements must be considered prior to touting a specific numeric criterion for water quality improvement.

The issues contained in this document have potentially significant impacts on the livelihood of grower throughout the United States and we urge the members to take these impacts into full consideration. NCGA would be pleased to participate in any discussion on this matter with EPA, NOAA or other Task Force members.

Sincerely,

Lynn O Jensen

Lynn O. Jensen
President