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# COMMENTS PRESENTED BEFORE THE MISSISSIPPI RIVER/GULF OF MEXICO WATERSHED NUTRIENT TASK FORCE

## 15<sup>th</sup> PUBLIC MEETING CINCINNATI, OHIO

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The Ohio Farm Bureau Federation (OFBF) would like to thank you for the opportunity to provide comments to the Mississippi River/Gulf of Mexico Watershed Nutrient Task Force regarding the goals of the 2001 Action Plan for Reducing, Mitigating, and Controlling Hypoxia in the Northern Gulf of Mexico (Action Plan). The Action Plan describes a national strategy to reduce the frequency, duration, size, and degree of oxygen depletion of the Gulf of Mexico hypoxic zone.

OFBF is the largest general farm organization in the state of Ohio with members in all of Ohio's 88 counties. Our members produce virtually every kind of agricultural commodity and as a result, OFBF is strongly interested in environmental policies and their potential impact to sustaining a viable agbioresource industry in the state. OFBF policies support the development of programs that are scientifically based, economically sound and to the maximum extent possible, delivered in a flexible and voluntary manner. The five principles that served as a guide during the development of the Long-Term Goals for the 2001 Action Plan are consistent with OFBF policies.

The Draft Meeting Agenda for the 15<sup>th</sup> Public Meeting of the Task Force indicates that the Task Force is seeking public input regarding the following two questions:

- Are the goals of the 2001 Action Plan adequate?
- Are there revisions to the 2001 Action Plan the Task Force should consider that it has not already considered?

Each of these questions will be addressed separately.

**Question 1: Are the 3 goals (coastal, within basin and quality of life) of the Action Plan adequate?**

***Coastal Goal:*** *By the year 2015, subject to the availability of additional resources, reduce the 5-year running average areal extent of the Gulf of Mexico hypoxic zone to less than 5,000 square kilometers through implementation of specific, practical, and cost-effective voluntary actions by all States, Tribes, and all categories of sources and removals within the Mississippi/Atchafalaya River Basin to reduce the annual discharge of nitrogen into the Gulf.*

The 2001 Action Plan states "The best current science indicates that sub-basin strategies, in aggregate, should be aimed at achieving a 30% reduction (from the average discharge in the 1980-1996 time frame) in nitrogen discharges to the Gulf (on a 5-year running average) to be consistent with the Coastal Goal for reducing the areal extent of hypoxia in the Gulf."

Reports prepared by USGS indicate the average annual total nitrogen flux to the Gulf during the 2000-2005 time period was at least 20% lower than the annual flux during the 1980-1996 time period. The size of the hypoxic zone was not reduced accordingly, raising questions about the appropriateness of the coastal goal. The complexity and annual variability inherent in natural systems suggests that a 2015 target date and/or a less than 5,000 square kilometer hypoxic zone target is overly optimistic and unattainable. Extending the target date to a more realistic 2030 or changing the target size of the hypoxic zone to 10,000 square kilometers would be more appropriate. The adaptive management scheme embedded within the Action Plan provides continual feedback between management actions and the interpretation of new information and should serve as the appropriate mechanism to adjust these targets in the future.

***Within Basin Goal:*** *To restore and protect the waters of the 31 States and Tribal lands within the Mississippi/Atchafalaya River Basin through implementation of nutrient and sediment reduction actions to protect public health and aquatic life as well as reduce negative impacts of water pollution on the Gulf of Mexico.*

A stated guiding principal of the Action Plan is that when establishing priorities for watershed restoration, state and federal agencies will consider the potential benefits to the Gulf of Mexico, direct current and increased resources to cost-effective, practical actions that will reduce nutrient delivery to the Gulf and give priority to watersheds with the highest nitrogen export. Nutrient and sediment reduction strategies must be developed at the state level reflecting the input of those individuals who will be responsible for their implementation.

Because every landowner and agricultural operation is unique, nutrient and sediment reduction strategies and implementation actions must allow individual flexibility. Solutions cannot be “cookie-cutter” solutions established at a national level if consistency with the voluntary, practical and cost-effective guiding principle of the Action Plan is to be maintained.

***Quality of Life Goal:*** *To improve the communities and economic conditions across the Mississippi/Atchafalaya River Basin, in particular the agriculture, fisheries, and recreation sectors, through improved public and private land management and a cooperative, incentive based approach.*

It is important to point out that as the implementation of the Action Plan takes place in the Mississippi/Atchafalaya River Basin, the removal of cropland acres for conservation set-asides will have an impact on the local economy due to the

loss of agricultural production. These social costs have the potential of being quite large and could impact the rural quality of life. As programs are developed, the potential detrimental impact to local communities must be considered.

**Question 2: Are there revisions to the Action Plan the Task Force should consider that it has not already considered?**

Successful implementation of the Action Plan is dependent upon the availability of adequate technical assistance and financial resources at the state and federal level. Even with limited additional resources, in the time period from FY 2000 to FY 2006, conservation buffers and other conservation practices have affected a significant acreage of cropland in the Mississippi/Atchafalaya River Basin:

- 8.55 million acres -conservation buffer practices
- 20.8 million acres - conservation tillage and residue management practices
- 18.3 million acres - nutrient management
- 1.42 million acres - wetland creation, enhancement and restoration
- 1,867 acres – drainage water management
- 1,972 miles – stream bank restoration.

The fact that millions of acres of cropland have been affected with existing resources since the release of the 2001 Action Plan is a success story that needs to be recognized and actively promoted.

**Other Items of Concern**

It is imperative that the Task Force provides an adequate amount of time for the review and comment on the revised Action Plan. If the release of the revised Action Plan takes place as scheduled in mid-November, it would be necessary to have a minimum of a 60-day comment period given the time of the year when the review will be taking place.