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*Forging a partnership between farmers and consumers. \* Working together for Ohio's farmers.*

June 4, 2007

Ms. Lisa Wojnarowski, Program Manager  
Council of Great Lakes Governors  
35 East Wacker Drive, Suite 1850  
Chicago, Illinois 60601

Re: Review and Comment of Draft Water Conservation Goals and Objectives

Ms. Lisa Wojnarowski:

The Ohio Farm Bureau Federation (OFBF) would like to thank you for the opportunity to review and submit comments on the Draft Water Conservation Goals and Objectives that have been formulated pursuant to the Great Lakes-St. Lawrence River Basin Sustainable Water Resources Agreement. These goals and objectives were developed as a result of many months of hard work by a host of dedicated individuals and I commend your efforts.

OFBF is the largest voluntary nonprofit agricultural organization in the state of Ohio. Because our members produce virtually every kind of agricultural commodity, OFBF is very interested in the implementation of the Great Lakes-St. Lawrence River Basin Sustainable Water Resources Agreement and its potential impact on Ohio's agricultural industry.

Our policies recognize the value of Ohio's freshwater resources and that protecting Ohio's water basins from withdrawals and diversions to other regions of North America is necessary to maintaining healthy viable ecosystems. It is our belief that Ohio's fresh water resources must be protected, enhanced and conserved for future generations and for the future viability of Ohio's agricultural industry.

We recognize that the draft objectives are intended to be broad, overarching concepts that will be used to form the development of future individual state and provincial water conservation goals and objectives, leading to the development of state and provincial water conservation programs. It is encouraging to see that draft objectives promote jurisdictional flexibility in water management program implementation. OFBF welcomes and encourages approaches that are non-regulatory in structure.

Agricultural water use is different from the other water uses in the Great Lakes Basin. The concepts of seasonal or intermittent water usage along with a high use efficiency associated with agricultural irrigation makes it inappropriate to apply a “one size fits all” regulatory solution. The water management system must consider the balance between efficient use of water with the amount of water retained within the basin due to the permeability of open agricultural land.

It is imperative that Great Lakes water policy be based on science and current information. The draft objectives recognize the need for improved monitoring, standardized information collection, enhanced research activities and expanded technology transfer. OFBF agrees with these principals.

Recognizing the need for accurate information collection, Ohio agricultural producers are concerned and cautious about submitting water use data that could be freely available to the general public. Any information gathered should be used for the sole purpose of increasing the knowledge and understanding of Great Lakes water resources not for litigation purposes or to establish a water allocation program. The information submittal process should be transparent but confidentiality of sensitive or proprietary information must be maintained with submitted information not being in the public domain.

Thank you once again for the opportunity to comment on the draft Water Conservation Goals and Objectives. The broad application of the Great Lakes-St. Lawrence River Basin Sustainable Water Resources Agreement to Great Lakes agriculture will not be a simple task. Seasonal or intermittent water usage along with the high water use efficiency associated with agricultural irrigation makes it challenging. Jurisdictional water management plans must be based on common sense and incorporate a maximum amount of flexibility. Ohio and Great Lakes agriculture can not be placed at a competitive disadvantage.

Sincerely

John C. Fisher  
Executive Vice President

JCF/lma