December 20, 1999

GEORGE H. RYAN
GOVERNOR

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.

Dear Members of the Hypoxia Working Group:

I am transmitting the attached as the State of Illinois’ response to the Notice of Availability of an Integrated Assessment of the Causes and Consequences of Hypoxia in the Gulf of Mexico (FRL-6461-3).

I am concerned that the Draft Integrated Assessment produced by the Committee on Environment and Natural Resources (CENR) of the Executive Office of the President for the President and the Mississippi River/Gulf of Mexico Watershed Nutrient Task Force appears to have been prepared with little or no consideration of the extensive comments I submitted on July 27, 1999 in response to the six technical assessments of hypoxia in the Gulf of Mexico. While the relationship between fertilizer use in the Midwest and Gulf hypoxia remains scientifically unproven, some of the recommended responses could have serious economic consequences for Midwestern farmers. I therefore encourage you to respond to the scientific concerns we have previously, and continue to express.

Sincerely,

[Signature]
GEORGE H. RYAN
Governor

Attachments (2)
GHR/IDNR/JDG/bda
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.

Dear Members of the Hypoxia Working Group:

Please allow this letter and attachments to serve as the State of Illinois’ response to the Notice of Availability of an Integrated Assessment of the Causes and Consequences of Hypoxia in the Gulf of Mexico (FRL-6461-3).

Scientists in a number of state agencies have reviewed the Draft Integrated Assessment produced by the Committee on Environment and Natural Resources (CENR) of the Executive Office of the President for the President and the Mississippi River/Gulf of Mexico Watershed Nutrient Task Force. I submit their comments (Attachment 1) and request that this letter and the attached comments and diagrams be used in preparing the final Integrated Assessment and be made available on the Internet.

In general, state scientists find that the reports do not present a clear cause-effect relationship between fertilizer use and other nitrogen sources and hypoxia in the Gulf of Mexico, and the report does not adequately express scientific uncertainty. We are left with a great deal of confusion rather than clarity.

I am particularly disappointed that Governor Ryan and the State of Illinois have not received a response to the letter and 27 pages of comments on the six technical assessment reports that were submitted on July 27, 1999. It is very difficult to engage in a process that has multiple, sequential steps when the next step (i.e., Draft Integrated Assessment) is started before the previous step has been completed. The difficulty was even more so experienced by the Illinois scientists who had a hard time preparing a response to the Draft Integrated Assessment in the absence of a response to their many comments, suggestions, and concerns regarding the six technical assessment reports. Due
to the absence of a response to our July 27, 1999, letter and comments, I resubmit our July 27 comments (Attachment 2) as part of this response to the Draft Integrated Assessment and I look forward to receiving responses to both sets of comments.

Once the CENR Hypoxia Working Group has finalized and approved the Integrated Assessment early next year, our scientists will review the report. In advance of finalizing the Integrated Assessment, I implore you to respond to the many issues and concerns we have raised regarding the science upon which the Integrated Assessment is based.

Sincerely,

[Signature]

Renee Cipriano
Senior Advisor to the Governor
Environmental and Natural Resources

Attachments (2)

GHR/IDNR/JDG/kac

cc: Brent Manning
    Joe Hampton
    Bruce Yurdin
    Jim Garner
    Brian Anderson
    Derek Winstanley