



Agribusiness Association of Iowa

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May 29, 2014

Nancy Stoner
Acting Assistant Administrator for Water
U.S. Environmental Protection Agency

Jo-Ellen Darcy
Assistant Secretary of the Army (Civil Works)
Department of the Army

Re: Docket ID: EPA-HQ-OW-2013-0820 and EPA-HQ-OW-2011-0880

On behalf of the Agribusiness Association of Iowa (AAI), I am writing to formally request an extension of the comment periods for the interpretive rule that applies to exemptions for normal farming practices under Section 404 of the Clean Water Act (Docket ID: EPA-HQ-OW-2013-0820) and the proposed rule defining waters of the U.S. (Docket ID: EPA-HQ-OW-2011-0880). These two rules have the potential to significantly impact Iowa's landscape and include considerable amount of materials and supporting documents that necessitates more time to provide thoughtful comments.

AAI's membership includes over 1,100 business locations from across the state that supply feed, seed, crop protection products, grain, fertilizer, equipment and additional products and services that benefit agriculture. Our members provide products and services to nearly every farmer in Iowa. AAI has hired additional staff, put together new committees, and developed new initiatives in support of Iowa's Nutrient Reduction Strategy, a voluntary, science-based frame work that will lead to targeted reductions of nitrogen and phosphorus loads in our state's waterways from both point sources and non-point sources. Our members are very serious about helping farmers to implement new best management practices that reduce the nitrogen and phosphorous loads in Iowa waters.

Due to the comment period for the interpretive rule landing directly on top of Iowa's late spring planting season, our members and their customers are extremely busy and have not had the opportunity to give these rules the required attention needed, and this is of great concern to us. Therefore, we are requesting that the 45 day comment period for the interpretive rule be extended to 180 days.

Additionally, we request that the current 90 day comment period for the proposed rule defining waters of the U.S. be extended until 120 days after the completion of the EPA Science Advisory Board's scientific review of the draft EPA Report entitled *Connectivity of Streams and Wetlands to Downstream Waters: A Review and Synthesis of the Scientific Evidence* (Connectivity Report). We believe that providing comments before reviewing this report, which serves as the scientific basis for the proposed rule defining waters of the U.S., would be premature. This requested extension would allow the appropriate time needed to fully review the report in addition to the other information presently available and provide constructive comments.

We thank you for providing the opportunity to comment on both of these important rules.

Sincerely,

Joel Brinkmeyer, CEO
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