

February 22, 2010

Docket No. APHIS-2007-0044  
Regulatory Analysis and Development  
Plant Protection Division -Animal and Plant Health Inspection Service  
United States Department of Agriculture  
Station 3A-03.8  
4700 River Road Unit 118  
Riverdale, MD 20737-1238

Re: Draft Environmental Impact Statement – Request for Determination of Nonregulated Status  
for Glyphosate-Tolerant Alfalfa

I am writing to convey Kansas Farm Bureau comments regarding USDA's Animal and Plant Health Inspection Service (APHIS) Draft Environmental Impact Statement – November 2009, entitled "Glyphosate Tolerant Alfalfa Events J101 and J163: Request for Non-Regulated Status."

Kansas Farm Bureau supports the deregulation of the two alfalfa engineered events (J101 and J163) for tolerance to the herbicide glyphosate. We are the largest farm organization in Kansas with nearly 40,000 voting, farmer and rancher members, and a Hay and Forage Advisory Committee that provides insight and input to our policy process. Alfalfa is a significant crop in Kansas, with 850,000 acres harvested in 2009.

The environmental impact statement prepared by APHIS both validates and ensures that these two glyphosate tolerant alfalfa events should have no significant impact on the human environment, biology of alfalfa, presence of glyphosate-resistant weeds, threatened or endangered species, herbicide use, socioeconomics, human health and safety, or land use and the physical environment.

Farm Bureau policy at both the state and national levels clearly supports conventional and organic farming, as well as the use of biotechnology. We believe that advancements in biotechnology like Roundup Ready alfalfa seed can improve marketability, ease environmental concerns, raise farmer income by lowering costs and improve the overall quality and quantity of farm products. We also believe that farmers who want to share in these benefits can co-exist with those farmers who choose to produce crops without the use of biotechnology.

We applaud USDA-APHIS's efforts, appreciate the opportunity to comment, and wholeheartedly support your proposal to grant non-regulated status to genetically-engineered glyphosate tolerant alfalfa lines J101 and J163. Agriculture has a long history of safe and successful use of biotechnology and we look forward to the day when alfalfa growers will be able to join other American farmers in sharing the benefits and opportunities offered by modern biotechnology. Lastly, we encourage the agency to act as rapidly as possible in effecting the necessary regulatory revisions that will facilitate safe, science-based oversight of these biotechnology products.

Sincerely,



Mark Nelson  
Director of Commodities  
Kansas Farm Bureau