



Nebraska Farm Bureau Federation®

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August 10, 2011

Docket No. APHIS-2001-0023
Animal and Plant Health Inspection Service
4700 River Road, Unit 118
Riverdale, MD 20737-1238

RE: Monsanto Company determination of nonregulated status for corn designated as MON 87460, genetically engineered drought tolerant corn, Docket No. APHIS-2011-0023

Dear Sir/Madam,

I am writing on behalf of the 55,000 members of Nebraska Farm Bureau Federation to offer our support and recommendation for Monsanto's drought-tolerance trait, MON 87460.

Nebraska Farm Bureau Federation recognizes the growing demand for food, feed, fuel, and fiber which must be met with limited environmental resources. We believe advanced technology and trait development are crucial to meet the growing demand for grain. Monsanto's drought tolerance trait would limit yield loss and minimize risk for farmers in water-limited conditions that are present in the Western Corn Belt which can help ensure a more stable grain supply and help conserve the total number of acres needed to meet these needs.

The drought trait would be an additional tool to improve overall productivity in the Western Corn Belt where precipitation averages between 12 to 20 inches. My farming operation, located near Grant, in Perkins County, Nebraska, is in the heart of this region. My son and I raise no-till, dryland corn in a wheat-corn rotation. Dryland corn grown in this area is prone to frequent drought stress resulting in lower yields. Moreover, in this region of Nebraska, farmers are looking to additional means to reduce water consumption in order to meet Nebraska's interstate obligations.

This trait can contribute to the farmer's ability to increase production with lower inputs, reduce the environmental footprint, and increase the efficiency of the water available, both rainfed and irrigated. It could potentially result in reduced crop irrigation needs which would help Nebraska meet its interstate compact obligations. The drought-tolerance trait would also generate economic benefits and value for producers, consumers, and processors and continue to fuel Nebraska's economy.

In closing, Nebraska Farm Bureau Federation supports Monsanto's petition for nonregulated status for MON 87460.

Sincerely,

Keith Olsen, President
Nebraska Farm Bureau Federation