

EPA's top gun on Indirect Land Use Change (ILUC) confesses she has never visited a US farm; "I'm inviting her to mine," says Sen. Grassley

<http://biofuelsdigest.com/blog2/2009/05/29/epas-director-on-iluc-reveals-in-house-testimony-she-has-never-visited-a-us-farm-im-inviting-her-to-mine-says-sen-grassley/>

If you touch the farm, sometimes the farm will touch you (Alpaca Farm, Friday Harbor, WA)

Seasons of Love

"In 525,600 minutes - how do you measure a year in the life?"
—Seasons of Love, from RENT

If my math is right, 21 million minutes have passed since the 1968 arrival of Margo Oge in Lowell, Massachusetts as a 19-year old from Greece, speaking no English, en route to university and the beginnings of a fine career. The story of her rise from humble roots to Director of the EPA's Office of Transportation and Air Quality - in which position she has served 15 years - would be on anyone's short list as a material example of the American Dream.

The fact that she has never set foot on an American farm probably never mattered before. (Note her testimony before a House subcommittee in which this fact was revealed, available here on You Tube, in clip 9, at 2:45 into the questioning by Rep. Lynn Westmoreland of Georgia – http://www.youtube.com/view_play_list?p=9D8DC00E8639FFE2).

Her academic background is in plastics, engineering and government, and in her recent career she has been primarily supervising the emissions coming from industry and cars.

But when the Congress passed the Energy Independence and Security Act in December 2007 and required the EPA to measure both the direct and indirect impacts of biofuels, the task fell to Ms. Oge and her team to propose a model for how Indirect Land Use Change is to be accounted for.

That's when the farm thing became a problem. Because in this case, the EPA is not regulating smokestacks, or industrial odors, or cars, or urban waste - things that any city dweller is all too familiar with. Nor is the EPA regulating lobbyists, or even farmers, or other things or people that can roll on in to Washington complete with charts, and talking points, and campaign contributions.

The EPA is proposing to regulate crops. Crops live on farms, are anchored to the ground, and do not travel to Washington to testify.

Imagine, I asked my wife, who works in the aviation industry, what would happen if it turned out that the person who was responsible for air traffic control in the United States had never visited an airport? She was apoplectic. "That would never happen - it's unthinkable," she opined. But, in agriculture, the unthinkable has come to be.

"How can you be an impartial regulator of an industry," asks Senator Charles Grassley of Iowa, "if you haven't experienced it?"

Look Who's [Not] Talking

40 years in America is a long time without stepping on a farm, but then we live in two Americas, the farm and the city. Though we have increasing means of communication — social networks like Facebook and LinkedIn and Twitter — we seem to be communicating only in tribes. City folk talk to city folk. Farmers talk to farmers. Kids talk to kids. The Beltway talks to the Beltway.

Sen. Charles Grassley of Iowa, on hearing that the director of EPA's ILUC effort had never visited an American farm, said "I'm not surprised," but added, "I'll invite her to mine".

"Faceless bureaucrats," said Senator Grassley. "I'm not surprised," he added when asked about the director's lack of familiarity with farms.

"Let me give you some advice," said Rep. Lynn Westmoreland (D-GA), the ranking member of the subcommittee, to Ms. Oge during her testimony, "Get out of Washington. Go spend some time with these farmers."

The tribal nature of the Republic these days would be a social issue well worth discussing over the kitchen table in Clarinda, IA or New York, NY if it were not tied to the 60 day comment period, after which the EPA will cast the Renewable Fuel Standard in stone. From that point forward, we will be stuck with it, or stuck with a long court battle over what is, or what is not, Indirect Land Use Change.

So who does the EPA talk to, and how do they get their bedrock understanding of the real issues? Where do they get their "gut feel", as opposed to the opinions formed from running dry models that spin around like the wheels of a slot machine in academia and the Federal Reserve. The kind that told us that 9/11 would not happen, that the derivatives market would not need regulation, that the sub-prime mortgage market would hold up, and the levees in New Orleans would never fall down.

Indeed, how do you measure, measure a year? In meetings, in model runs, in cups of coffee with lobbyists? In gallons per acre, parts per million, or bushels for export?

Due Process vs Don't-Do Process

Let's see how EPA measured their year. Well, actually almost a year and a half by now since EISA was signed by President Bush.

Thousands of model run pages - so many in fact that Ms. Oge confessed she had not herself read them all. Did anyone? Could anyone? Perhaps we will never know. Ms. Oge said she was confident that the process was right. Right before she confessed she had never visited a farm.

But she did say that EPA had sought out and met with many farmers and members of industry. Perhaps it would be fair to say that she met many representatives of industry and farmers, or some kind of Potemkin assembly of token representatives assembled to convey the impression of due process.

Mr. Smith Spams Washington

How many real people from any walk of life really go to Washington, except in those pepped-up, talking-point infested, lobbyist-designed blitzes where a Million Moms or a Million Men or a Million Manufacturers descend on the Capitol like a locust? Those events involve as much true discourse as a conversation with a telemarketer.

Ms. Oge conveyed to the House Small Business subcommittee that the EPA has consulted widely on indirect land use change. And then every subsequent witness from industry or the farm denied under oath that they had been contacted by the Environmental Protection Agency. Which perhaps would be just an unlucky coincidence if the witness list had not included the American Soybean Association.

Pretty big miss in the outreach process when the number one biodiesel crop is soybeans.

But I don't doubt they tried to do outreach. There is something else amiss here. Something deep. Something important. Something that was supposed to arrive in the bus that brought "change you can believe in", but didn't make it.

"More of the Same" You Can Believe In

We had the changing of the guard, but not, alas, the change of attitude. The attitude that people outside the Beltway or major universities not named Warren Buffett or Boone Pickens are stupid, second-rate, and only worth communicating with when its time to raise money or launch a flood of emails into the White House to simulate the feel of public support.

I can't think of any other compelling reason why the EPA would embrace NASA satellite data from 2001-04 as a means to calibrate land use change, but then politely rebuff Rep. Aaron Schock's (D-IL) suggestion that actual land use change data from Brazil and the US in the past four years is relevant. The data seems to inconveniently contradict central tenet of ILUC theory.

They must think the Congressman is stupid. The data showed, said Rep. Shock, that higher soy prices in the US and biodiesel production was accompanied by a drop in Brazilian soy acreage, not an increase.

"Let me make it clear," said Ms. Oge to Congressman Schock. "We're looking at 2022, not today. You can't compare what's going on today, with what we're looking [at], which is the 2022 production level."

I can't think of a good argument as to why NASA satellite data from 2001-04 is relevant to indirect land use change, yet 2004-08 actual acreage totals are not. Except that the EPA is looking for data to support a theory, which is inductive reasoning and a dubious path for science or regulation. It looks like they are discounting data that disagrees with the model. Perhaps there is a better explanation. I hope so. I doubt it.

Can Hubble detect ILUC at the edge of the universe?

Indirect land use change is rooted in an economic theory that price and demand information passes across infinite amounts of space without degrading the signal. No one who depended on a cell phone traveling in rural America would give two cents for that concept, because everyone knows that the farther you are from a cell tower, the more the risk of a dropped call.

Farmers are sophisticated small business people. It's America's original small business. They know how to find the price of Brazilian soybeans. The faraway can be known and can have an impact, but distance muffles. Local overwhelms. Farmers are more influenced by local markets, local yields, local tax systems, local incentives, local weather, local inventory, local demand, and local costs.

"All politics is local," said Tip O'Neill. Not a bad way to think about farming.

Why did South American soy planting not increase exponentially when US soy prices rose? Ask any farmer - crop rotation, opportunities in ethanol, rising land prices, tax considerations, and low yields.

Take, for example, tax policy. Argentine soy planting increases earlier this decade was prompted not by high prices, but by beef export restrictions designed to create a surplus that would keep beef prices low at home. Farmers switched to soy not for biodiesel but for an export market. Conversion there was. For reasons that were entirely local.

For example, another type of tax policy. In the US, we pay real estate taxes annually. Not so in every other country - in South Africa, for example, there is a transfer tax of around 8 percent. There are few "flippers" in South African real estate - the economics favor the long-term holder, and land conversion is inherently more difficult.

Washington conversion turns out to be mighty difficult too. I thought change had come. I have been mightily encouraged that EPA Administrator Jackson has made, since her confirmation in January, no less than five visits to sites of renewable energy production. Four in Wyoming and one in the Netherlands, as far as a review of the records could reveal.

I was less enthralled when, in her testimony, Ms. Oge offered that "I may not have been to a farm, but I have been to Brazil". I am happy that the EPA overseers of ILUC have an opportunity to visit Brazil. But it does not alter the importance of spending time with that which one hopes to regulate. The SEC should visit Wall Street. The local building department should visit and understand the nature of construction sites. School commissioners should visit and understand schools. The EPA ILUC team should visit and understand farms.

"I will invite her to my farm," boomed Senator Grassley, adding that any of the EPA team members working on ILUC would be welcome at the Grassley farm.

The Senator makes a simple invitation, but, like most Senators who have learned on the stump to use simple words to convey deeper points, there's something to this idea of time on the farm.

The EPA resists the charge that it is out of touch with the American farmer and their grassroots efforts in conservation and environmental protection. (Pictured, farm in North Carolina)

The EPA resists it; resists the idea that it doesn't know the country. They think they know the country, though some might say they think they are the country.

Ms. Oge in her testimony reinforced consistently that the EPA was deeply interested in, and welcomed, input on rulemaking. She was questioned about and spent some time discussing the outreach programs that the EPA has implemented and in which, in many ways, she is responsible for. In 2004, in fact, Ms. Oge was a recipient of the Presidential Distinguished Executive Rank Award for her outstanding leadership on environmental transportation issues. I don't doubt the sincerity of her belief in EPA outreach

The EPA doesn't see the relevance of first-hand familiarization with what it proposes to protect.

There are 1.4 million square miles of farmland in the Republic. That's the land in every state east of the Mississippi River - nearly twice over. How is it possible to be at EPA all those years and manage to miss that much of our beautiful, precious country?

Ironically, the EPA released a study this week that relates closely to this subject. It's couched in the arcane language that goes over better in the halls of academia and government offices, where scholarly equivocation is more popular than a United States Senator whose speaking style plays better in the countryside where Henry David Thoreau is long forgotten but his maxim "simplify, simplify" lives on.

Change the EPA can believe in

In "Quantifying a Relationship Between Place-based Learning and Environmental Quality: Final Report," Duffin, Murphy and Johnson conducted a multi-agency evaluation of air quality education programs. They found "programs reporting more place-based learning (PBL) qualities and practices such as service-learning and community partnerships were more likely to report improvements in air quality." They warned that there study was based on a small sample and may not necessarily be generalized to topics such as biofuels or climate change education. But they did find in their study that "the single strongest predictor of air quality improvement was the degree to which the program incorporated an aggregate measure of the principles of place-based learning."

That's why it's important to visit the land. Place-based learning changes you, ask the EPA. They believe in it. They don't believe in it. They drive you crazy arguing one way and then the other.

Common sense rescues the mind. Everyone knows intuitively that direct encounters change you. Inform you. They modify your outlook in ways beyond conversation, more profoundly than a rendition of "Getting to Know You", or perhaps not. That song, from the King and I, reflected the changes coming over a woman who suddenly had become a stranger in a strange land. She went to Thailand, and found unexpected love.

As John Muir said...

As it is with people, so it is with the land. John Muir used to say in the Sierra Club's early days that a person would go up into the mountains as whatever he was before, but he would come down the mountain a conservationist.

We are all of us children of the soil, descended recently or distantly from ancestors who worked a family farm or a village green. Though we have passed by a multitude of routes from the land to our present coordinates, we all share a legacy measured in bushels and pecks and gills.

Today there are just 2 million farms in these United States, and excluding retirees and those whose major occupation is outside the farm, there are just 800,000 working farms today. Many, many people have never met a farmer, and even fewer have tilled a patch of soil bigger than a backyard garden.

We have met the alien, and he is us

Those of us who have left the farm or are descended from those who left before are like members of a second republic that has little in common with the yeoman farmers that Jefferson believed would anchor the Republic forever.

The American farmer is as alien to the average city-dweller now as a Saudi sheik, and the hard lessons of a life based on the soil — what it yields and where and how, and what it will yield not — is as foreign to average urban experience as the means of survival on Mars.

Though we, the people of the 50 states all pledge allegiance to the one flag of the one republic, we are two nations, under [deity of your choosing], frequently divisible.

It seems to me that the national shouting match over farm policy will not be solved by the method Bob Dole once outlined to T. Boone Pickens: “There are 21 farm states, and that’s 42 senators. Those senators want ethanol.”

That seems to me to be the road to pork instead of paradise.

Get Back, Jojo

I believe it will be solved by a national conversation that begins with a re-acquaintance with the soil. It’s for that reason that I am a strong supporter of Michael Pollan’s concept of “Victory gardens”, small plots farmed in home gardens and planter boxes that would supplement the food supply and bring us closer to an understanding of the possibilities in the dirt.

But I would go one step farther, and suggest to every state to declare a Farm Day, and on that day that every farmer cooperative and every farming family host family and friends from the city for a day of enjoyment on the farm.

Too often we fall into the trap of thinking of agriculture or ranching, or even agrienergy, only as a “sector” in some intangible thing called “the economy”, and we experience only through the highly processed offerings that we still call “food” but that our farmer ancestors would hardly have recognized as such.

Conversely, too often we think of the land as some collection of amber waves of grain suitable for housing prairie dogs and antelope, or as a backdrop for inspiration-laden framed photos that hang on corporate walls or as some kind of national carbon sink that it suppose to offset the impact of emission-laden lifestyles that take place primarily in American cities.

You’ve Got a [Farmer] Friend

On an actual farm, speaking with actual farm relatives, I believe that Americans would emerge with a more sophisticated understanding of the challenges and opportunities in our national acreage. From dialogue, better ideas might flow and better ways than shouting would certainly be developed across picnic tables that would foster communication, and perhaps some small revived tincture of a national conversation that has long devolved into negotiations between narrow tribal interests.

It may seem impossible that some percentage of 2 million farmers could, via some summer picnics with their city relations, reach out to the wider America and change the way we talk and think about food, and energy independence, and all the things that flow or may one day flow from the farm.

But LinkedIn tells me that my 4,500 registered friends have 800,000 friends, and that those friends are connected to 13 million people in all. It seems to me that reaching out to a meaningful slice of the population is much easier than it used to be. Everybody knows somebody, and all those somebodies add up to everybody.

Michael Pollan once wrote: “If you are what you eat, and especially if you eat industrial food, as 99 percent of Americans do, what you are is corn.” Which is totally cute, but we are the sum of our experiences, not the sum of our meals. Our experiences are based in the who we saw, and where we saw them; the time we spent and where we spent it. If you reach down and touch the grass, the grass will touch you back.

Stability comes from comity, a social harmony of agreed ideals and a common framework, and not just from a common set of laws or institutions. Renewable energy needs stability, and the deep support that comes from the deep commitment of those who have debated the possibilities and the logical boundaries of agrienergy with their hearts as well as their minds.

Perhaps we'll love again

It used to be that the biggest fights over farming were squabbles before the state fair as to who would bring in the biggest watermelon, or which state or county or farm would have the biggest harvests (for the record, let me brag that my beloved home state of Washington leads the nation in corn yields).

We need to get back to that kind of squabble. We were a better nation back then, and will be better again when we get back to some of the old ways we loved, and lost, yet perhaps did not lose everywhere, and perhaps will love again.