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CENTER FOR ENVIRONMENTAL ADVOCACY ♦ MISSOURI COALITION FOR THE  
ENVIRONMENT ♦ PRAIRIE RIVERS NETWORK ♦ SURFRIDER FOUNDATION—CENTRAL  
GULF COAST CHAPTER ♦ TENNESSEE CLEAN WATER NETWORK

October 29, 2007

Dr. Holly Stallworth  
Designated Federal Officer  
SAB Hypoxia Advisory Panel  
U.S. Environmental Protection Agency

Dear Dr. Stallworth, SAB Hypoxia Advisory Panel, and Hypoxia Task  
Force,

The undersigned organizations wish to submit the following comments on  
the final draft report on Hypoxia in the Northern Gulf of Mexico by the  
EPA Science Advisory Board's Hypoxia Advisory Panel (HAP.)

As stated in the report's Executive Summary, the Panel was charged with  
evaluating the state of the science regarding hypoxia in the Northern  
Gulf of Mexico and potential nutrient mitigation and control options in  
the Mississippi-Atchafalaya River Basin (MARB), including the  
scientific basis for goals and policy options for dealing with the  
hypoxia problem. This charge included consideration of all options  
that decision-making bodies, such as the Mississippi River/Gulf of  
Mexico Watershed Nutrient Task Force, might implement in efforts to  
reduce the spread of the Gulf Dead Zone. We commend the HAP for stating  
forcefully that: "the most urgent need is to reduce nutrient  
discharge"; "nutrients should be reduced as soon as possible before the  
[Gulf] system moves to a point of no return"; and, the action component  
lags behind the growing body of science (Executive Summary, pages 6 and  
8). This call from the scientific community for immediate action to  
aggressively address point and non-point sources of nitrogen and  
phosphorus pollution has recently been echoed in the National Research  
Council's report titled *Mississippi River Water Quality and the Clean  
Water Act: Progress, Challenges, and Opportunities*. These experts in  
their fields even go a step further and recommend the setting of  
numeric nitrogen and phosphorus criteria as a vital first step.

The HAP draft report notes that adaptive management provides a  
framework for acting in the face of uncertainty, and that the optimal  
location of actions such as best management practices will vary across  
and within watersheds. The variety of practices described in the report  
can be targeted to the most appropriate landscapes and watersheds for  
the best and most cost-effective results, especially when undertaken in  
combination.

It is regrettable, but not surprising, that the Panel and the SAB have  
come under considerable political pressure from some Midwest states and  
stakeholder groups to not only weaken recommendations of the report,  
but also to alter the actual process by which the report is evaluated

and presented to the public. While the extension of the public comment period will provide an opportunity for more agencies and stakeholders to comment, we hope that the scientific conclusions of the HAP's independent process will be upheld, and that the report can serve as a useful guide for an expanded and adequately funded policy effort on a basin-wide scale.

We recognize that this final draft represents the culmination of a challenging task that was given to the HAP to complete within a relatively short period of time. We thank you for your time and hope that you take these comments, as well as other comments that our organizations have submitted individually and as a group, into consideration.

Sincerely,

Environmental Law and Policy Center (Illinois)

Environmental Working Group (Washington, D.C.)

Gulf Restoration Network (Louisiana, Mississippi, Florida, Alabama, Texas)

Iowa Environmental Council

Kentucky Waterways Alliance

Louisiana Environmental Action Network

Lower Mississippi Riverkeeper (Louisiana)

Midwest Environmental Advocates (Wisconsin)

Minnesota Center for Environmental Advocacy

Missouri Coalition for the Environment

Prairie Rivers Network (Illinois)

Surfrider Foundation—Central Gulf Coast Chapter

Tennessee Clean Water Network