

**Reactive Nitrogen in the United States;
An Analysis of Inputs, Flows, Consequences, and Management Options**

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Executive Summary

Introduction

Reactive nitrogen (Nr) encompasses biologically and radiatively active, and chemically reactive nitrogen compounds¹. At the global scale, human activities now create approximately two-fold more Nr than natural continental ecosystems. In the United States (US), Nr creation by human activity is about 5-fold larger than natural processes. Human activities create Nr by: (1) the Haber-Bosch process to generate ammonia (NH₃) for synthetic nitrogen fertilizer and industrial feedstocks, (2) the enhancement of biological nitrogen fixation (BNF) in crop cultivation (e.g., legumes), and (3) the combustion of fossil fuels. The first two anthropogenic activities form Nr on purpose; the last one forms Nr as an unwanted pollutant.

Anthropogenic creation of Nr provides essential benefits for humans--first and foremost in meeting human dietary needs. In fact, a large fraction of the human population of the earth could not be sustained if synthetic nitrogen fertilizers did not augment food production significantly all over the world. There are, however, some costs associated with these benefits. Essentially all of the Nr created by human activities is lost to the environment, often with negative, unintended consequences. There it circulates between, and accumulates within, environmental systems that include the atmosphere, and aquatic and terrestrial ecosystems and contributes to a number of adverse public health and environmental effects. These effects are of great concern to environmental and human well-being and include photochemical smog formation, increased exposure to nitrogen-containing trace gases and aerosols, decreased atmospheric visibility, acidification of terrestrial and aquatic ecosystems, eutrophication of coastal waters and freshwater Nr imbalances, global warming and other greenhouse effects, and stratospheric ozone depletion.

Nr effects are manifest as declines in both human health (e.g., respiratory and cardiac diseases) and ecosystem health (e.g., eutrophication and loss in biodiversity). The effects are often magnified because any one atom of nitrogen in the environment can contribute to both beneficial and detrimental effects in sequence, as excess Nr moves through various environmental reservoirs. This feature of Nr is the conceptual foundation for the *nitrogen cascade*.

The nitrogen cascade concept provides a conceptual framework to assess and quantify the effects of Nr as it originates, flows and transitions through the atmosphere, land and water. The framework helps organize Nr sources within each environmental system, its transfer among the systems, and the benefits and impacts along the way. It further highlights potential opportunities

¹ The term reactive nitrogen (Nr) is used in this paper to include all biologically active, chemically reactive, and radiatively active nitrogen (N) compounds in the atmosphere and biosphere of Earth. Thus, Nr includes inorganic chemically reduced forms of N (NHx) [e.g., ammonia (NH₃) and ammonium ion (NH₄⁺)], inorganic chemically oxidized forms of N [e.g., nitrogen oxides (NOx), nitric acid (HNO₃), nitrous oxide (N₂O), N₂O₅, HONO, peroxy acetyl compounds such as PAN, and nitrate ion (NO₃⁻)], as well as organic compounds (e.g., urea, amines, amino acids, and proteins), in contrast to non-reactive gaseous N₂.

1 for source reduction or management intervention within each system that integrates those actions
2 among sources and media (air, land, water) to provide an efficient mechanism for regulation.

3 To assist EPA in its understanding and management of nitrogen-related air-, water-, and soil-
4 pollution issues, this Integrated Nitrogen Committee (INC) was formed and charged by the
5 Science Advisory Board (SAB) of the US Environmental Protection Agency to address the
6 following objectives:

- 7 1. Identify and analyze, from a scientific perspective, the problems nitrogen presents in the
8 environment and the links among them;
- 9 2. Evaluate the contribution an integrated nitrogen management strategy² could make to
10 environmental protection;
- 11 3. Identify additional risk management options for EPA's consideration; and
- 12 4. Make recommendations to EPA concerning improvements in nitrogen research to support
13 risk reduction.

14 **Procedure**

15
16 The INC followed a structured procedure to meet the four objectives established by the SAB,
17 with the nitrogen cascade serving as the framework for analysis. The INC found the nitrogen
18 cascade model to be the most suitable approach for incorporating air, land and water aspects of
19 integrated Nr research and management that included both human and ecosystem effects in a
20 comprehensive fashion. This was essential given the varied and diverse make up of the INC that
21 needed to cross the boundaries of individual expertise to create an integrated outcome. This was
22 accomplished through regular interactions among the members, both in person and via
23 conference call and e-mail exchange with coordination by the chair and vice-chair of the INC
24 and the SAB Designated Federal Officer (DFO).

25 Several steps in the early phase of the INC work were necessary to ensure a complete and
26 functional nitrogen cascade structure. These included analyzing the cascade by media-based
27 environmental systems (air, land and water) and establishing the transfer routes and interactions
28 among them. The relationships among the environmental systems allowed identification of Nr
29 sources, kinetics, and the related stressors and receptors within them and the ready application of
30 risk analysis principles. Once this information was established and risks identified, the
31 committee identified points of intervention for Nr control and other actions to reduce risk were
32 determined. The INC used that understanding to estimate national load reduction potential from

² An integrated nitrogen management strategy takes an holistic approach for managing Nr. In the context of the nitrogen cascade, all Nr anthropogenic creation and destruction mechanisms and all Nr uses are recognized. The strategy should take account of synergies and trade-offs, to ensure that decreasing one problem related to nitrogen does not result in other unintended adverse environmental, economic and societal consequences. By identifying relative priorities, assessing cost effectiveness and risks, the strategy should seek to maximize the benefits of reactive nitrogen, while limiting overall adverse effects.

1 management of major sources and points of intervention. The committee also assessed the
2 feasibility of attaining those targets and assessing the level of risk reduction from those actions.
3 To assist EPA with management approaches, the INC also reviewed federal management
4 programs and authorities as currently implemented to identify areas where enhancement or
5 revision might be recommended. Finally, as anticipated in the INC charge, the INC developed
6 recommendations for monitoring, assessment and research that would build the understanding
7 necessary to improve Nr management and better attain the goals and objectives for both
8 environmental and human health protection in the future.

9 This Executive Summary contains an overview of the analyses made by the INC to fulfill the
10 four charges. The detailed analyses that support the conclusions and recommendations follow in
11 the main body of the report. It summarizes the Nr inputs to the US, the fate of the Nr in the US
12 and addresses how both public health and environmental impacts are, and could be, assessed.
13 The recommendations are organized within three tiers. The first tier contains “overarching”
14 recommendations for both research and management that the INC believes would help the EPA
15 develop an integrated nitrogen management strategy. The second tier consists of four
16 recommendations (“Target Goals”) that are suggested for management actions that could achieve
17 an initial 25% decrease in the amount of Nr lost to the US environment using existing
18 technologies. The third tier offers more specific recommendations to provide a comprehensive
19 overview of the study, as well as to support and clarify the intent of the overarching
20 recommendations.

21 The INC worked for two years gathering scientific data and information on Nr inputs into the
22 US, the flows of Nr through US environmental systems and the influence that various human
23 activities have had on these flows within the nitrogen cascade. Extensive literature that exists on
24 Nr-related impacts on public health on the atmosphere as well as on terrestrial ecosystems and
25 aquatic ecosystems was drawn upon and summarized. These necessary reviews and analyses
26 provided the intellectual foundation for INC to address the following more detailed policy-
27 relevant questions:

- 28 • How should Nr be managed and how should management priorities be determined?
- 29 • To what degree can the US decrease Nr losses to the environment using existing
30 technology?
- 31 • What further decreases are needed?
- 32 • What more can EPA do to develop a total integrated management strategy for Nr?
33

34 In recent years, other studies have examined some aspects of the biogeochemical flows of Nr in
35 the US nitrogen cycle, the impacts of alterations in those flows, and suggested policies for
36 addressing some specific consequences of those alterations. By contrast, this report of the INC
37 committee seeks to provide an integrated and holistic approach to all aspects of the current Nr-
38 management problems and challenges in our country. The INC is convinced that the EPA has a

1 potentially powerful lead role to play -- together with other federal, state, and local organizations
2 -- in developing integrated strategies to maximize beneficial impacts and decrease detrimental
3 impacts of Nr management in this country.

4 **Overview**

5 The INC addressed the four objectives in the following manner.

6 ***Objective 1: Identify and analyze, from a scientific perspective, the problems Nr presents in the*** 7 ***environment and the links among them.***

8 To address this objective, the INC used the nitrogen cascade framework to determine the major
9 sources of newly created Nr in the US (see Figure 1). The flows of Nr within the food, fiber, feed
10 and bioenergy production systems for the US were examined, paying special attention to the
11 locations in each of these systems where Nr is lost to the environment. The same process was
12 employed for energy production but, since all the Nr formed during energy production is lost to
13 the environment, the committee identified the important energy producing sectors that contribute
14 to Nr formation (Section 2.2, which begins on page 32 of this report).

15 The committee next examined the fate of the Nr lost to the environment, estimated the amount
16 stored in different systems (e.g., forest soils) and tracked Nr as it was transferred from one
17 environmental system (e.g., the atmosphere) to another (e.g., terrestrial and aquatic ecosystems)
18 (Section 2.3, which begins on page 63 of this report). The end results of these two activities are
19 summarized in Figure 2.

20 These two activities set the stage for addressing the environmental and human health problems
21 Nr presents, and the links among them. Using the nitrogen cascade, the committee identified the
22 impacts Nr has on people and ecosystem functions as it moves through different systems. The
23 committee also addressed the metrics that could be used, i.e., impacts due to environmental
24 changes (e.g., acid deposition), vs. impacts due to losses of ecosystem services (e.g., loss of
25 biodiversity), and trade-offs among Nr Impacts. (Section 2.4, which begins on page 94 of this
26 report, covers these aspects of the first objective).

27 ***Objective #2: Evaluate the contribution an integrated N management strategy could make to*** 28 ***environmental protection.***

29 An integrated management strategy must take into account the contributions of all Nr sources,
30 and all chemical species of Nr that adversely impact both human health and environmental
31 systems. Further, the strategy should ensure that solving one problem related to Nr does not
32 exacerbate another problem or diminish necessary human services to produce food, feed, fiber,
33 or bioenergy. In short, the strategy should seek to achieve desirable benefits of Nr, while limiting
34 overall adverse effects.

1 To address this challenge, the committee identified several actions that could be taken to better
2 manage Nr in one environmental system that have caused unintended consequences in another.
3 Examples of management actions that could be taken that would be ‘integrative’ in nature are
4 highlighted.

5 ***Objective #3: Identify additional risk management options for EPA’s consideration.***

6 The INC has identified four major Target Goals for actions, which collectively, would limit Nr
7 losses to the environment by about 25%, recognizing that decreasing Nr emissions by these
8 actions will result in further decreases in Nr-related impacts throughout the nitrogen cascade.
9 INC has suggested several ways in which each of these Target Goals could be attained including
10 conservation measures, additional regulatory steps, application of modern technologies, and end-
11 of-pipe approaches. These are initial actions; others should be taken once the recommended
12 actions in the report that focus on a better understanding of N dynamics and impacts in the US
13 are completed.

14 ***Objective #4: Make recommendations to EPA concerning improvements in Nr research to***
15 ***support risk reduction.***

16 Throughout the report, there are summary statements, labeled “Findings.” Attached to these
17 findings are one or more specific “Recommendation” for actions that could be taken by EPA or
18 other management authorities. In each case, the intent is to provide the scientific foundation
19 regarding a specific Nr-relevant environmental issue and one or more recommendations by
20 which EPA acting alone or in cooperation with other organizations could use currently available
21 technology to decrease the amount of Nr lost to the US environment.

22 The INC report includes three “Overarching” recommendations, supported by more specific,
23 action-oriented recommendations that would enable EPA to improve Nr-relevant research in the
24 support of risk reduction strategies.

25 The remaining sections of this Executive Summary cover the points made above in greater detail.

26 **Nr Sources and Transfers**

27 *Sources of Nr*
28

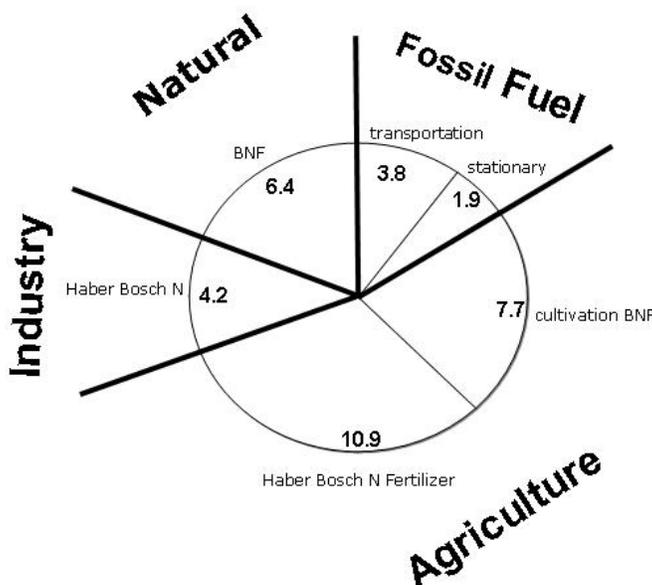
29 At the global scale, human activities produce approximately twice as much reactive nitrogen as
30 do natural processes; in the US, however, the amount of Nr produced by human activities is
31 approximately five-times larger than natural processes. As shown in Figure 1, natural ecosystems
32 in the US introduce about 6.4 teragrams (Tg) of reactive nitrogen per year (Tg N/yr). In contrast,
33 human activities introduce about 28.5 Tg N/yr.
34

35 The largest single source of Nr in the US is the Haber-Bosch process, which introduces about
36 15.2 Tg N/yr -- 9.4 Tg N/yr from domestic US Nr production and 5.8 Tg N/yr from imports of
37 synthetic Nr fertilizers, feed grains and food. This total amount is used in three ways -- 9.9 Tg

1 N/yr is used to produce agricultural crops; 1.1 Tg N/yr is used to produce turf grasses; and 4.2 Tg
2 N/yr is used as industrial feed stocks for production of nylon, refrigerants, explosives and other
3 commercial products.

4
5 Fossil fuel combustion is the second largest source of Nr. It introduces approximately 5.7 Tg
6 N/yr into the environment (almost entirely as NO_x) -- 3.8 Tg N/yr from transportation sources
7 and 1.9 Tg N/yr from stationary sources such as electric utilities and industrial boilers.

8
9 **Figure 1: Sources of reactive nitrogen (Nr) introduced into the US in 2002 (Tg N/yr)**



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Explanatory notes:

- Numerical units = teragram of reactive nitrogen (Nr) per year (Tg N/yr)
- Natural BNF = biological nitrogen fixation in natural grasslands, rangelands, and forests,
- Fossil Fuel-Transportation = combustion of fossil fuels in transportation vehicles.
- Fossil Fuel-Stationary = combustion of fossil fuels in power plants and industrial boilers.
- Agriculture-cultivation BNF = agricultural augmentation of biological nitrogen fixation -- for example by planting of nitrogen fixing legumes.
- Agriculture-Haber Bosch N fertilizer = agricultural use of synthetic nitrogen fertilizers produced by the Haber Bosch process for converting gaseous N₂ to Nr.
- Industry-Haber Bosch N = Industrial sources of Nr produced by the Haber-Bosch process.

1 The third largest source of Nr introduced into the US is enhancement of biological nitrogen
2 fixation (BNF) by cultivation of legume crops like soybeans and alfalfa that have nitrogen-fixing
3 symbionts, or by crops like rice that have nitrogen-fixing bacteria in their rhizosphere. These Nr
4 fixing crops introduce about 7.7 Tg N/yr. A small amount of additional Nr is also imported in
5 grain and meat products; in 2002 this source of added Nr was approximately 0.2 Tg N/yr.
6

7 In summary, agricultural production of food, feed, fiber, and bioenergy and combustion of fossil
8 fuels are the largest sources of Nr released into the environment compared to other human
9 sources in the United States. The percentage distribution of Nr released to the US environment
10 from human activities in 2002 was: about 65% from agricultural sources, about 20% from fossil
11 fuel sources, and about 15% from industrial sources (Figure 1).
12

13 Although fossil fuel combustion is widely recognized within EPA and society in general to be a
14 major source of nitrogen, sulfur, and carbon pollutants and resulting environmental quality
15 concerns in the US, in fact, feed and food production and subsequent consumption by animals
16 and humans are much larger (about 3.3 times larger!) sources of reactive nitrogen than fossil fuel
17 combustion.
18

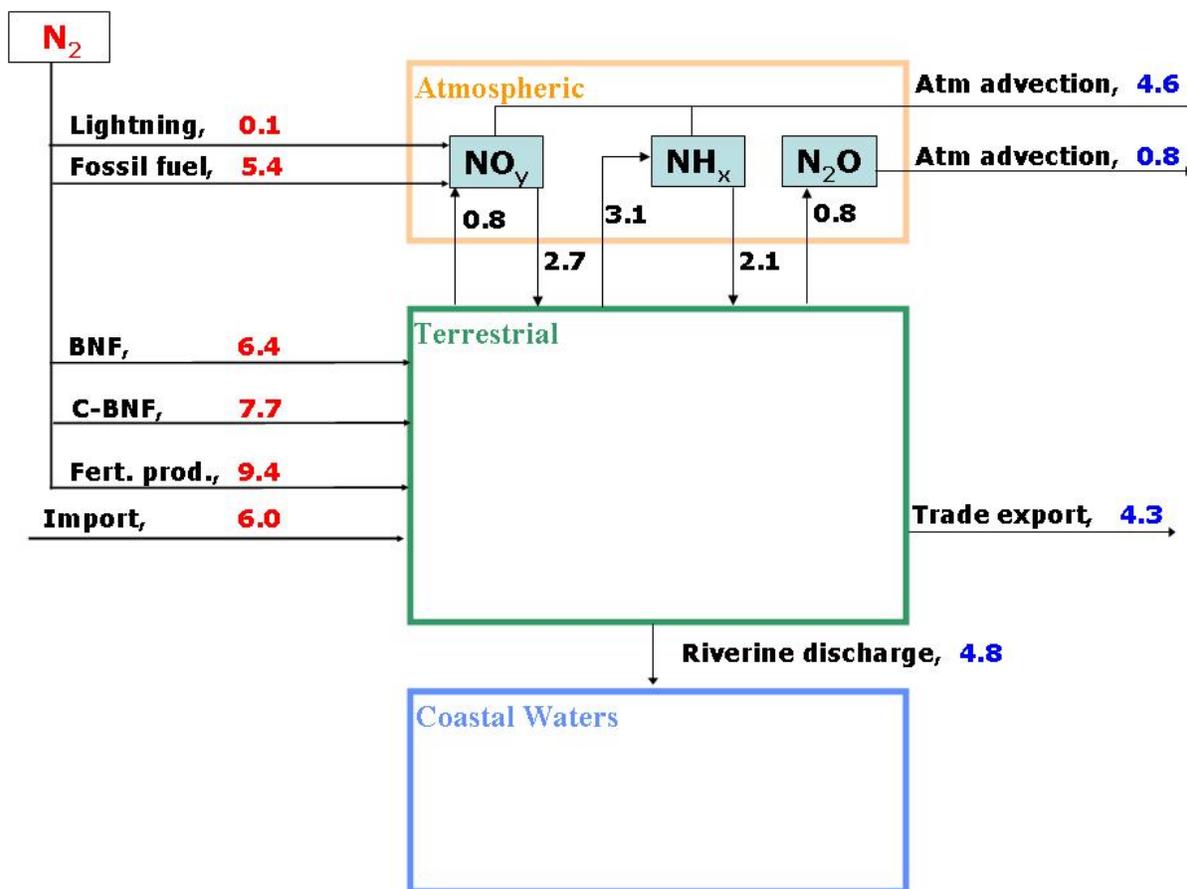
19 *Transfers of Nr among environmental systems* 20

21 There are several possible fates for the approximately 35 Tg N/yr introduced into the US
22 environment each year from natural sources and human activities. Emissions of N₂O discharge
23 about 0.8 Tg N/yr into the global atmosphere. Of the 6.3 Tg N/yr of US NO_x emissions, 2.7 Tg
24 N/yr are deposited back onto the land and surface waters of the US. Thus, by difference we
25 estimate that as much as 3.6 Tg N/yr per year are advected out of the US atmosphere. Similarly,
26 of the 3.1 Tg N/yr of NH₃ that are emitted into the US atmosphere each year, about 2.1 Tg N/yr
27 are deposited onto the land and surface waters of the US, and about 1 Tg N/yr is advected out of
28 the US via the atmosphere.
29

30 Riverine discharges of Nr to the coastal zone account for 4.8 Tg N/yr, while export of N-
31 containing commodities (e.g., grain) removes another 4.3 Tg N/yr from the US. Altogether,
32 along with 5.4 TgN/yr of atmospheric advection, these total losses add up to about 14 Tg N/yr,
33 leaving about 21 Tg N/yr unaccounted for. Of this amount, we estimate that 5 Tg N/yr year are
34 stored in soils, vegetation, and groundwater, and, by difference, we estimate that about 16 Tg
35 N/yr are denitrified to N₂ (Figure 2). There are substantial uncertainties (+/- 50%) for some of
36 these rough estimates -- especially those that involve NH_x emission and deposition and terms
37 that are arrived at by difference (e.g., atmospheric advection and denitrification). These
38 significant uncertainties drive the three “Overarching Recommendations” of this report.

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Figure 2: Nr inputs and outputs for the US in 2002 (Tg N/yr)



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Explanatory notes:

- Shown are inputs into the US atmosphere from lightning and fossil fuel combustion, and into the US terrestrial system from biological nitrogen fixation in unmanaged landscapes (BNF), biological nitrogen fixation in cultivated landscapes (C-BNF), fertilizer production within the US (Fert prod), and imports of nitrogen-containing commodities.
- Also shown are emissions of NO_y , NH_x and N_2O , and deposition of NO_y and NH_x to the US landscape. Losses from the US are shown as atmospheric advection of NO_y and NH_x (by difference), and of N_2O . The best estimate of advection of NO_y plus NH_x from the continent (export) are smaller than shown here, but these values are within the uncertainty and used for internal consistency among all media. See Section 2.3.
- The sum of the inputs is 35 Tg N/yr, the sum of the outputs is 14 Tg N/yr. The difference (missing Nr) is 21 Tg N/yr. As discussed in the text, we estimate that storage in soils, vegetation and groundwater is ~5 Tg N/yr. By difference, we estimate that formation of N_2 by denitrification is ~16 Tg N/yr.

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Consequences, impacts, and metrics for Nr Use

Because nitrogen is both a critically important natural resource and also a contributor to a number of adverse environmental problems, it is imperative to understand how to decrease the risks to society while also providing the food, energy, and materials required by society.

The most important beneficial consequence of Nr use in the United States (and other parts of the world) is providing adequate supplies of wholesome food, feed, fiber, and fuel crops to meet dietary and other needs of people in this country and abroad – an issue of global food security. In many ecosystems the supply of biologically available Nr is a key factor controlling adequacy of food, feed, and fiber supplies, the profitability of crop and animal agricultural, the nature and diversity of plant life, and vital ecological processes such as the cycling of carbon and soil minerals.

In addition to these very important human-beneficial consequences, there are also numerous and important negative consequences from anthropogenic Nr. These negative consequences include formation of photochemical smog, exposure to toxic gases and aerosols in the air, acidification and eutrophication of terrestrial and aquatic ecosystems, global warming and other greenhouse effects, as well as stratospheric ozone depletion. Human activities have not only increased the supply but enhanced the global movement of various forms of Nr through air and water. Mitigating risk from these factors is difficult because one molecule containing Nr can contribute to all of these effects as a consequence of the nitrogen cascade. Nitrogen is a dynamic element easily transformed from one chemical form to another and is transported rapidly through and among ecosystem reservoirs. These characteristics make nitrogen an especially challenging element to control.

Various approaches can be used to prevent, eliminate, decrease, or otherwise manage Nr risks. Understanding the environmental impacts of Nr can inform decisions on how best to manage nitrogen risks. There are two main approaches to characterizing the adverse public health and environmental impacts of Nr: traditional damage estimates and decreases in ecosystem services. Historically, EPA’s environmental protection programs have addressed the adverse public health and public welfare impacts of Nr through use of such common metrics as National Ambient Air Quality Standards (NAAQS) and, in the case of water resources, Total Maximum Daily Loads (TMDLs) built upon attainment of water quality standards and criteria. These common metrics have had the considerable advantage of providing frameworks within which air and water quality standards could be derived that are protective of specific human health and environmental risks – the principal missions of the USEPA. The ecosystem services approach complements these traditionally used common metrics by considering how specific ecosystem services provided by one or more ecosystems are impaired by excess Nr. The attractiveness of this approach is its recognition that the health of humans and the health of ecosystems are inextricably linked. Less clear, in some cases, however, are ways in which to measure and monitor these adverse impacts.

1 Ecosystem-service-based measurements provide a richer context for the complex connections
2 among Nr inputs and transformations. Furthermore, impacts on human well-being can help
3 identify those adverse effects of Nr that impose the greatest damage costs to society.

4
5 The INC believes that using both commensurate metrics and ecosystem-service based metrics
6 will:

- 7
8 • Provide a clearer picture of priorities for action,
9 • Help identify effective control points for decreasing Nr impacts, and
10 • Provide insights into more efficient and cost-effective regulatory and non-regulatory
11 strategies for decreasing Nr negative impacts.
12

13 *Tradeoffs Among Nr Risk Management Options*

14
15 Once the foreseeable impacts are understood and the suite of benefits associated with various
16 risk reduction options is described, then managers can consider trade-offs. Risk reduction
17 integration provides an intellectual framework that allows managers to make informed decisions
18 about which benefits may need to be relinquished for other benefits when not all the desired
19 benefits can be achieved. For example, limiting nitrogen fertilizer application to decrease risk
20 from Nr applied to agro-ecosystems may decrease crop yields and increase food and feed
21 commodity prices, which in turn may result in expansion of crop production area at the expense
22 of natural wetlands, grasslands, and forests—a process called indirect land use change.
23

24 *Measurement of Reactive Nitrogen in the Environment*

25
26 What air and water quality managers measure determines not only what they focus on but also
27 how they gauge the success or failure of their environmental management strategies and tactics.
28 Most regulations set limits or specify control technologies for specific forms of Nr without
29 regard to the ways in which Nr may be transformed once it is introduced into the environment.
30 Normally, regulations also require some form of monitoring to document compliance. However,
31 monitoring of the specific chemical forms of Nr is not enough. There is a need to measure,
32 compute, and report the total amount of Nr present in impacted systems in appropriate units
33 because one chemical form of Nr can be quickly converted to other forms.
34

35 The impacts of reactive nitrogen often can be expressed as the economic costs of damages, the
36 cost of remediation or substitution, or the cost/ton of remediation for each form of reactive
37 nitrogen. Damage costs do not always scale as tons of Nr released into the environment. If
38 damage costs rather than tons of nitrogen were utilized as a metric, the full implications of the
39 cascade, and the setting of priorities for intervention might differ. Similarly, if human mortality
40 and morbidity are the metrics used, priorities for decreases in Nr emissions could be very
41 different.
42

43 In order to determine the extent of damage caused by excess nitrogen in environmental
44 reservoirs, one needs to know both the present Nr concentration or loading within a reservoir and
45 the threshold at which negative impacts are manifested. This threshold then provides a target
46 load that can be used to guide strategies to decrease the amount of Nr in the reservoir. The

1 thresholds for impacts are better known for some adverse impacts than others. For example, the
2 impacts of ozone on human health are known well enough so that EPA has set standards for both
3 ozone and for NO₂, an ozone precursor. The same can be said for the impacts of Nr discharge to
4 coastal waters. Total Maximum Daily Loads (TMDLs) are used to link Nr loading to impact. On
5 the other hand, the impact of Nr deposition on ecosystems is less well known. There is strong
6 scientific evidence to show that Nr deposition rates of 10 – 20 kg N per hectare per year can
7 cause negative impacts on a variety of ecosystems. Since a large part of the land surface in the
8 northern hemisphere receives Nr deposition in that range, it is necessary to better define the link
9 between Nr deposition and ecosystem response. Further, and related to the previous section, our
10 knowledge of Nr deposition is uncertain, especially for the chemically reduced inorganic and
11 organic forms of Nr. Our knowledge needs to be improved to better link deposition to ecosystem
12 response and critical threshold.

14 **Integrated Risk Reduction Strategies for Nr**

15 Typically, quantitative risk assessment, technical feasibility, economic, social and legal factors;
16 and additional benefits of various air and water management strategies contribute to the
17 development of a suite of risk reduction strategies from which managers can select an optimal
18 approach.

20 *Management Strategies for Nr*

21
22 There are several ways in which the release and control of Nr in the environment can be
23 approached. In general these can be classified as follows:

- 24
25 1. Improved practices and conservation—in which the flux of Nr that creates an impact is
26 decreased through better management practices (e.g. on-field agricultural practices,
27 control of urban runoff, controlled combustion conditions)
28
- 29 2. Product substitution—in which a product is developed or promoted which has a
30 smaller dependency on Nr (e.g. use of switchgrass instead of corn grain as a feedstock for
31 biofuel ethanol production).
32
- 33 3. Transformation—in which one form of nitrogen is converted to another less damaging
34 form of nitrogen (e.g. nitrification of municipal wastewaters, denitrification of Nr by
35 converting it back to non-reactive gaseous N₂).
36
- 37 4. Source limitation—in which the amount of Nr introduced into the environment is
38 decreased (e.g., lower fertilizer application rates, use of catalytic converters and low-
39 NO_x burners in power plants).
40
- 41 5. Removal—in which particulate forms of Nr are captured in a more readily managed
42 physical form such as sewage sludge which can be disposed of by land application or
43 incineration.
44
- 45 6. Improved use or reuse efficiency—in which the efficiency of production that is
46 dependent on Nr is improved (e.g. increased grain yields per unit of Nr fertilizer applied,

1 decreased NOx emissions from more efficient diesel engines in trucks and off-road
2 construction equipment, reuse of Nr-laden runoff to grow algae for other uses, such as
3 bioenergy or animal feeds).

4
5 Efficient and cost-effective management of Nr often requires combinations of these six Nr
6 management strategies; no one approach is a perfect alternative for decreasing excess Nr in the
7 environment.

8 9 *Policy Mechanisms for Management of Nr in the Environment*

10
11 Generally speaking, US environmental policies employ one or more of the following four
12 mechanisms for management of pollutants in the environment:

- 13
14 1. Command-and-Control—in which permitted limitations on pollutant or chemical-
15 precursor emissions are issued under various regulatory statutes. Violations may
16 result in the assessment of penalties.
- 17
18 2. Government-based programs affecting the desirability of an environmental
19 management mechanism, such as directed taxes, price supports for a given
20 commodity, subsidies to bring about a particular end-result, and grants for capital
21 expansion or improvement of pollution-abatement technologies.
- 22
23 3. Market-based instruments for pollution control in which cap and trade markets are
24 used to bring about a desired policy end-result -- often at decreased overall cost
25 to society.
- 26
27 4. Voluntary programs in which desired environmental outcomes are achieved using
28 private or government-initiated agreements or through targeted outreach and
29 education programs.
- 30

31 An integrated approach to the management of Nr must use a combination of implementation
32 mechanisms. Each mechanism must be appropriate to the nature of the problem at hand,
33 supported by critical research on decreasing the risks of Nr, and reflect an integrated policy that
34 recognizes the complexities and tradeoffs associated with the nitrogen cascade. Management
35 efforts at one point in the cascade may be more efficient and cost effective than control or
36 intervention at another point. This is why understanding the nature and dynamics of the N
37 cascade is critically important.

38 39 **Major Findings and Recommendations**

40
41 The ultimate goal of this report is to aid EPA in the development of an integrated N management
42 strategy. To accomplish this, the committee recommends that EPA and other research
43 organizations strengthen the science related to flows and impacts of Nr, that EPA use current
44 knowledge to identify management actions that can be taken now, and that EPA join with other

1 organizations to implement management actions within a framework that does not exacerbate
2 one Nr problem when addressing another.

3
4 **Recommendation A**

5 *EPA should pursue an integrated multi medium approach to develop the scientific*
6 *understanding necessary for science-based policies, regulations, and incentives by which*
7 *to decrease the serious adverse impacts of excess Nr on terrestrial and aquatic*
8 *ecosystems, human health, and climate change. Such integration must cut across media*
9 *(air, land, and water), multiple chemical forms of Nr (including chemically oxidized,*
10 *chemically reduced, and organic forms), many different federal, state and local*
11 *government agencies, and private sector organization, and legislative statutes including*
12 *the Clean air Act (CAA), Clean Water Act (CWA), and the Energy Independence and*
13 *Security Act (EISA).*

14
15 **Recommendation B**

16 *EPA should form an Intra-agency Nr Management Task Force that will build on existing*
17 *Nr research and management capabilities within the Agency. This Intra-Agency Task*
18 *Force should be aimed at increasing scientific understanding of: 1) Nr impacts on*
19 *terrestrial and aquatic ecosystems, human health, and climate, 2) Nr-relevant monitoring*
20 *requirements, and 3) the most efficient and cost-effective means by which to decrease*
21 *various adverse impacts of Nr loads as they cascade through the environment.*

22
23 **Recommendation C**

24 *EPA should join with other agencies within the US government in establishing an Inter-*
25 *agency Nr Management Task Force. The members of this Inter-Agency Task Force*
26 *should include at least the following federal agencies: US Department of Agriculture*
27 *(USDA), US Department of Energy (DOE), US Department of Transportation (DOT),*
28 *National Oceanic and Atmospheric Administration (NOAA), and US Geological Survey*
29 *(USGS). This Task Force should coordinate federal programs that address Nr concerns*
30 *and help ensure clear responsibilities for monitoring, modeling, researching, and*
31 *managing Nr in the environment.*

32 The intra- and inter-agency Nr-Management Task Forces should take a systems approach to
33 research, monitoring, and evaluation in the following areas to inform public policy related to Nr
34 management:

- 35 • Development of methods to help implement a systems approach
 - 36 ○ developing and evaluating proposed Nr budgets
 - 37 ○ developing appropriate life cycle accounting methods

- 1 ○ developing monitoring as the basis for informed policies, regulations, and
2 incentive frameworks for addressing excess Nr loads
- 3 ○ evaluating the critical loads approach to air and water quality management
- 4 ○ developing Nr indicators for excess Nr effects on human health and environment
- 5 ○ developing new systems-based approaches for controlling NR releases to the
6 environment
- 7 ● Best management practices (BMPs)
- 8 ○ developing the scientific understanding required for identifying best management
9 practices (BMPs) for
- 10 ▪ Nr applications in agriculture to ensure adequate food, feed, fiber, and
11 bioenergy feedstock supply while also avoiding negative impacts on the
12 environment and human health;
- 13 ▪ Nr applications for residential and commercial landscape maintenance;
- 14 ○ establishing proactive extension and technology transfer approaches to facilitate
15 adoption of BMPs;
- 16 ● Assessment activities
- 17 ○ assessing combined carbon (C) and Nr effects on terrestrial and aquatic
18 ecosystems
- 19 ○ assessing indicators/endpoints, costs, benefits and risks associated with
20 impairment of human health and decline and restoration of ecosystem services
- 21 ○ reviewing existing and proposed legislation for purposes of extending Nr
22 regulatory authority or streamlining procedures for enacting Nr risk reduction
23 strategies
- 24 ○ evaluating economic incentives, particularly those that integrate air, aquatic, and
25 land sources of excess Nr
- 26 ● Developing new education, outreach, and communication initiatives

27 In addition, INC makes four recommendations that set near-term targets for the decrease of Nr
28 entering the environment from various sources.

- 29
- 30 (1) INC recommends that the EPA expand its NO_x control efforts from the current decreases
31 of emissions of passenger cars and power plants to include other important unregulated
32 mobile and stationary sources sufficient to achieve a **2.0 Tg N/yr** decrease in the
33 generation of reactive nitrogen.

1 (2) INC recommends a goal of decreasing livestock-derived NH₃ emissions by 30% (a
2 decrease of **0.5 Tg N/yr**) by a combination of BMPs and engineered solutions. This is
3 expected to decrease PM_{2.5} by ~0.3 µg/m³ (2.5%), and improve health of ecosystems by
4 achieving progress towards critical load recommendations. Additionally we recommend
5 decreasing NH₃ emissions derived from fertilizer applications by 20% (decrease by ~**0.2**
6 **Tg N/yr**), through the use of NH₃ treatment systems and BMPs.
7

8 (3) INC recommends that excess flows of Nr into streams, rivers, and coastal systems be
9 decreased by approximately 20% (~**1 Tg N/yr**) through improved landscape management
10 and without undue disruption to agricultural production. This would include activities
11 such as using wetland management (e.g., USDA Wetlands Protection Program),
12 improved tile-drainage systems and riparian buffers on crop land, and implementing
13 storm water and non-point source management practices (e.g., EPA permitting and
14 funding programs). In addition, the committee recommends that crop N-uptake
15 efficiencies be increased by up to 25% over current practices through a combination of
16 knowledge-based practices and advances in fertilizer technology (such as controlled
17 release and inhibition of nitrification). Crop output can be increased while decreasing
18 total Nr by up to 20% of applied artificial Nr, amounting to ~**2.4 Tg N/yr** below current
19 amounts of Nr additions to the environment. These are appropriate targets with today's
20 available technologies and further progress is possible.
21

22 (4) INC recommends that a high priority be assigned to nutrient management through a
23 targeted construction grants program under the CWA. This will decrease Nr emissions by
24 between **0.5 and 0.8 Tg N/yr**.

25 Implementing these recommendations would decrease the introduction of Nr into the US by
26 about 25%, which would then decrease the amount of Nr lost to the atmosphere, soils and waters.

27 Summary

28 Human activities have significantly increased the introduction of Nr loads into the US
29 environment and while there have been significant benefits resulting from increased food
30 production, there also have been, and will continue to be, major risks to the health of both
31 ecosystems and people due to the introduction of Nr into the nitrogen cascade. To maintain the
32 benefits and limit the negative impacts of excess of Nr, EPA should join with other federal
33 agencies, States, universities, and private sector organizations in developing both an integrated
34 total Nr management strategy, and a strong Nr public outreach and education program. The
35 committee understands that there are real economic costs to the recommendations contained in
36 this report. For each recommendation there will of necessity be tradeoffs derived from the
37 varying cost-effectiveness of different strategies. It is vitally important that the

1 recommendations, and the analysis of the associated trade-offs, be implemented and addressed in
2 an integrated manner.

3

Chapter 1: Introduction

1.1 General background about environmental impacts of N loading

Water, water everywhere, and all the boards did shrink;

Water, water everywhere, nor any drop to drink.

This couplet from the *Rime of the Ancient Mariner* (Samuel Taylor Coleridge, 1772–1834) is an observation that, although sailors were surrounded by water, they were dying of thirst because of its form. Just as water is a critical substance for life, so is N. And just as most of the water on the planet is not useable by most organisms, most of the N is also unavailable.

Approximately 78% of the atmosphere is diatomic nitrogen (N_2), which is unavailable to most organisms because of the strength of the triple bond that holds the two N atoms together. Over evolutionary history, only a limited number of species of bacteria and archaea have evolved the ability to convert N_2 to N_r via biological N fixation. However, even with adaptations to use N efficiently, many ecosystems of the world are limited by N.

This limitation has driven humans to use increasingly sophisticated and energy-intensive measures to obtain N_r to sustain food production and to produce other commodities (e.g., nylon, explosives). In the beginning, hunters and gatherers harvested food from natural stocks. With the advent of agriculture, local sources of N_r were used (soil stocks, crop residue, manures) to increase productivity of landscapes. In the 19th century, long range transport of N_r to sustain food production increased by shipping bird guano from the Pacific Islands and nitrates from South America to Europe and other locations. By the beginning of the 20th century, these sources were not sufficient to sustain the growing global population requirements for food.

This deficiency led to what has been called one of the world's most important discoveries—how to extract N_2 from the atmosphere and convert it to NH_3 —the Haber-Bosch process (Smil, 2001; Erisman et al., 2008). Today this process and cultivation-induced biological N fixation (C-BNF) introduce over 140 teragrams (Tg) of N per year (hereafter expressed as Tg N/yr) into the global environment to sustain food production. Another 23 Tg N/yr are introduced by the Haber-Bosch process for the chemical industry, and 25 Tg N/yr are introduced via the combustion of fossil fuels.

The total global anthropogenic N_r creation rate is ~190 Tg N/yr (2005), substantially larger than the median of estimates for N_r creation by natural terrestrial processes (~100 Tg N/yr) (Galloway et al., 2008). The fact that humans are more effective than nature in N_r creation means that on average, humans are less reliant on natural sources of N_r . However, with global commodity stocks running at a 58 day supply and food prices increasing dramatically, the challenge is to increase the nutrient use efficiency of N_r in agricultural systems while maintaining or increasing yields (USDA ERS/World Agricultural Outlook Board, July 11, 2008. World Agricultural Supply and Demand Estimates).

1 There are large regional disparities in Nr creation rates on both absolute and per capita bases. Total
2 Nr creation is larger in Asia than in any other region. Per capita Nr creation is largest in North
3 America and Europe. Humans also redistribute large amounts of Nr among countries or regions of
4 the world through exports of fertilizers, feed grains, and fossil fuels. Nevertheless, there are large
5 regions of the world with populations approaching one billion, where there is malnutrition due to a
6 lack of adequate supply of available Nr to sustain crop production, among other reasons.

7 The introduction of Nr into most regions of the United States (US) by humans has greatly increased
8 food availability. However, since essentially all the Nr created for food production and by fossil fuel
9 combustion is lost to the environment, it has also greatly increased Nr's contribution to a wide
10 variety of environmental problems. Most plants, animals, and microorganisms are adapted to
11 efficiently use and retain small increments of additional Nr. Addition of Nr to most ecosystems
12 may first lead to increased uptake, growth, storage, and hence to increased biomass, including food
13 or fiber production. However, further addition of Nr in excessive amounts often leads to imbalances
14 in the movement of Nr between reservoirs and potential losses in the form of air emission or water
15 discharges into other ecosystems where it may disrupt ecosystem functions and have a negative
16 impact on resources. In essence, the assimilative capacity of the ecosystem may be insufficient to
17 benefit from increases in Nr without disruptive change. While there will always be Nr losses during
18 food production, the challenge is how to minimize those losses while meeting the demand for food
19 production.

20 Negative consequences of Nr flux in the US environment include increases in photochemical smog
21 and PM_{2.5}, decreases in atmospheric visibility, both increases and decrease in productivity of
22 grasslands and forests, acidification of soils and freshwaters, accelerating estuarine and coastal
23 eutrophication, increases in the emission of greenhouse gases to the atmosphere, and decreases in
24 stratospheric ozone concentrations. All of these changes in environmental conditions lead to a
25 variety of negative impacts on both ecosystem and human health. These changes, which impact air,
26 land, water and the balance of life in an interrelated fashion, are often referred to a cascade of effects
27 from excess Nr³ or the “nitrogen cascade” (Figure 3). Unlike other element-based pollution

³ Excess reactive nitrogen (Nr) is defined as the amount of Nr that is present in, or introduced into, an environmental system (e.g., Nr inputs to the atmosphere, Nr inputs to grasslands and forests, Nr inputs to estuaries) from anthropogenic sources that is not incorporated into agricultural and other biological products (e.g., food, feed, fuel and fiber), or stored in long-term storage pools (e.g., cropland soils).

Thresholds are used to determine at what amount excess Nr causes negative effects on ecosystem services and functions, and human health. Thresholds vary by metric (e.g., concentration, loading, etc) and depend on the environmental system (e.g., atmosphere, forest). Examples for specific thresholds are given later in the report in relevant sections.

1 problems, the N cascade links the negative impacts, where one N-containing molecule can in
2 sequence contribute to all the environmental issues mentioned above.

3 The nitrogen cascade has three dimensions:

- 4 • biogeochemical,
- 5 • environmental changes and
- 6 • human and ecosystem consequences (Figure 3).

7 The “biogeochemical” dimension of the nitrogen cascade involves Nr creation from N₂ as a
8 consequence of chemical, food and energy production, Nr use in food and chemical production, Nr
9 losses to the environment, changes in Nr species residence times in environmental reservoirs, Nr
10 transfers among reservoirs and Nr conversion back to N₂. Environmental changes then result from
11 increased Nr levels in the environment. These environmental changes have negative consequences
12 for ecosystem and human health at local, regional, national and global scales. Because nitrogen is a
13 critical resource and also a contributor to many of the environmental concerns facing the US today
14 it is imperative to understand how human action has altered N cycling in the US, and the
15 consequences of those alterations on people and ecosystems. The over-arching question is how do
16 we protect and sustain an ecosystem that provides multiple benefits to society while also providing
17 the interconnected material, food and energy required by society?

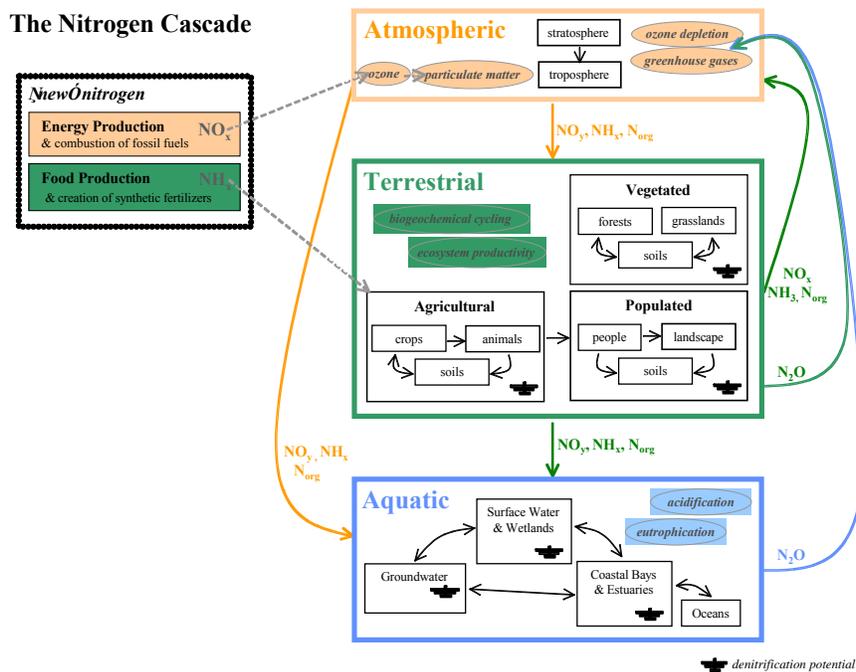
18 In summary, Nr inputs to the nation and the world have been increasing, largely due to human
19 activities associated with food production and fossil fuel combustion. Despite the obvious benefits
20 of a plentiful supply of food and energy, the adverse consequences associated with the accumulation
21 of Nr in the environment are large, with implications for human health and the environment.

22 The greater the inputs of Nr to the landscape, the greater the potential for negative effects, caused by
23 greenhouse gas production, ground level ozone, acid deposition, and Nr overload that can contribute
24 to climate change, degradation of soils and vegetation, acidification of streams, lakes and rivers,
25 estuarine and coastal eutrophication, hypoxia and habitat loss.

26 The growing nature of the Nr problem, and the adverse and intertwined consequences associated
27 with Nr inputs to air, land, and water as exhibited in the N cascade underscore the need for
28 researchers and managers to explore integrated strategies that minimize N inputs, maximize its use
29 efficiency, promote Nr removal processes and protect humans and natural resources.

1
2

Figure 3: The Nitrogen Cascade



3

4 *The popular concept of the nitrogen cascade highlights that once a new Nr molecule is created, it*
5 *can, in sequence, travel throughout the environment contributing to major environmental problems*
6 *(Galloway et al., 2003). This adaptation of the cascade was developed by the Integrated Nitrogen*
7 *Committee to provide a context for considering nitrogen-related issues and ecosystem effects in the*
8 *US. To consider the cascading effects of Nr in the US, we examine the relative sizes of the various*
9 *atmospheric, terrestrial, and aquatic environmental systems where Nr is stored, and the magnitudes*
10 *of the various flows of N to, from, and within them. The nitrogen cascade concept implies the*
11 *cycling of Nr among these systems. The important process of denitrification is the only mechanism*
12 *by which Nr is converted to chemically inert N₂, ‘closing’ the continuous cycle.*

13 *The “new” N box depicts the two primary anthropogenic sources by which Nr originates, energy*
14 *production and food production, and where they enter ecosystems. Energy production includes both*
15 *fossil fuel and biofuel combustion. Food production includes N fertilizer produced in the US,*
16 *cultivation-induced biological N (C-BNF) in the US, production of animals and crops in the US for*
17 *human consumption, and imports of N-containing fertilizer, grain and meat to the US.*

18 *The atmospheric system indicates that tropospheric concentrations of both ozone and particulate*
19 *matter are increased due to NO_x emissions to the atmosphere. The ovals illustrate that the increase*
20 *in N₂O concentrations, in turn, contribute to the greenhouse effect in the troposphere and to ozone*
21 *depletion in the stratosphere. Except for N₂O, there is limited Nr storage in the atmosphere. Losses*
22 *of Nr from the atmospheric system include NO_y, NH_x, and organic nitrogen (N_{org}) deposition to*

1 *terrestrial and aquatic ecosystems of the earth's surface. There is little potential for conversion of*
2 *Nr to N₂ via denitrification in air. However, once airborne deposition of Nr occurs it will be subject*
3 *to denitrification pathways via soil and water.*

4 *The terrestrial system depicts that Nr enters agricultural lands via food production and is introduced*
5 *to the entire terrestrial landscape via atmospheric deposition. Within agricultural regions there is*
6 *cycling between soils, crops and animals, and then a transfer of Nr as food to populated regions,*
7 *from which there are Nr losses (e.g, sewage, landfills). The ovals showing ecosystem productivity*
8 *and biogeochemical cycling reflect that Nr is actively transported and transformed within the*
9 *terrestrial system, and that as a consequence there are significant impacts on ecosystem productivity*
10 *due to fertilization and acidification, often with resulting losses of biodiversity. There is ample*
11 *opportunity for Nr storage in both biomass and soils. Losses of Nr from this system occur by*
12 *leaching and runoff of NO_y, NH_x and N_{org} to Aquatic ecosystems and by emissions to Atmospheric*
13 *system as NO_x, NH₃, N_{org}, and N₂O. There is potential for conversion of Nr to N₂ via denitrification*
14 *in the terrestrial system.*

15 *The aquatic system shows that Nr is introduced via leaching and runoff from terrestrial ecosystems*
16 *and via deposition from atmospheric ecosystems. Connected with the hydrological cycle, there are*
17 *Nr fluxes downstream with ultimate transport to coastal systems. Within the aquatic system, the*
18 *ovals highlight two significant impacts of waterborne Nr—acidification of freshwaters and*
19 *eutrophication of coastal waters. Except for Nr accumulation in groundwater reservoirs, there is*
20 *limited Nr storage within the hydrosphere. Losses of Nr from the aquatic system are primarily via*
21 *N₂O emissions to the atmospheric system. There is a very large potential for conversion of Nr to N₂*
22 *via denitrification in water and wetlands.*

23 **1.2 Overview of EPA research and risk management programs in context of other** 24 **environmental management and research programs**

25 The mission of the Environmental Protection Agency is to protect human health and the
26 environment. In achieving this mission, EPA is accountable for addressing five goals given in
27 the 2006 – 2011 EPA Strategic Plan:

- 28 1. Clean air and global climate change,
- 29 2. Clean and safe water,
- 30 3. Land preservation and restoration,
- 31 4. Healthy communities and ecosystems, and
- 32 5. Compliance and environmental stewardship.

1 The *Strategic Plan* includes targets for reducing risk from N. EPA's *Report on the Environment*
2 (ROE), provides "data on environmental trends," to determine whether or not EPA is on track to
3 meet its targets and goals. EPA is responsible and accountable for reducing at least some risks
4 from reactive N.

5 The principal mechanisms for Nr removal from circulation in the environment are complete
6 denitrification (re-conversion of Nr back to non-reactive gaseous N₂), and storage in long-term
7 reservoirs (e.g., soils, sediments, and woody biomass). In some cases, it may be possible to
8 capture Nr emissions or discharges and deliver them to food or fiber production areas where
9 there are nitrogen deficiencies. However, major challenges in the management of the N cycle
10 are how to decrease creation of Nr while still meeting societal needs, promote denitrification of
11 excess Nr (without producing N₂O), and improve the efficiency of use and reuse of excess Nr in
12 a cost-effective manner. Solving both these challenges will result in less Nr accumulation

13 The parts of EPA most directly concerned are the Office of Air and Radiation, the Office of
14 Water, and the Office of Research and Development. Programs designed to save energy, such as
15 Energy Star, tend to reduce emissions of Nr as well.

16 EPA's Office of Air and Radiation reduces risk from Nr in over a dozen programs including
17 National Ambient Air Quality Standards (NAAQS) standard setting and implementation;
18 emission standards for industrial stationary sources and area sources; the Acid Rain Program; the
19 Clean Air Interstate Rule; and programs that focus on mobile source emissions. EPA's Office of
20 Water addresses Nr under both the Clean Water Act and the Safe Drinking Water Act with
21 activities such as; criteria development and standard setting; NPDES permits; watershed
22 planning; wetlands preservation; and regulation of Concentrated Animal Feeding Operations
23 (CAFOs).

24 EPA's Office of Research and Development's mission is to conduct leading-edge research and
25 foster the sound use of science and technology in support of EPA's mission. ORD is well
26 recognized for providing a scientific basis for the development of the NAAQS standards for NO_x
27 and particulate matter (PM). ORD's revised Multi-Year Plan for Ecological Research will
28 identify and quantify the positive and negative impacts on ecosystem services resulting from
29 changes in nitrogen loadings from major source categories to support policy and management
30 decisions in EPA's Offices of Air Resources and Water.

31 EPA has brought a great variety of risk reduction tools to bear on reactive N: conventional
32 regulation and enforcement; cap and trade approaches; measurement, monitoring and place-
33 based approaches; control technology development and verification; communication and
34 education; intergovernmental and international cooperation, and voluntary approaches. The
35 variety and breadth of EPA programs addressing Nr reflect the ubiquity of Nr in the
36 environment, the historical single medium regulatory approach, and the lack of a silver bullet for
37 reducing risks from N.

1 Recommendation #8 of the Science Advisory Board's 1990 report, *Reducing Risk*, was:

2 EPA should increase its efforts to integrate environmental considerations into broader aspects of
3 public policy in as fundamental a manner as are economic concerns. Other Federal agencies
4 often affect the quality of the environment, e.g., through the implementation of tax, energy,
5 agricultural, and international policy, and EPA should work to ensure that environmental
6 considerations are integrated, where appropriate, into the policy deliberations of such agencies.

7 In the current era of increasing responsibilities without commensurate budgets,
8 intergovernmental cooperation, partnerships and voluntary programs have become vital tools for
9 agencies needing to stretch their resources to fulfill their missions.

10 **1.3. The need for integration**

11

12 Some impacts of N on ecosystems and people have been known for centuries (e.g., impacts of
13 atmospheric deposition on agricultural crops); others for only a few decades (e.g., impact of N₂O on
14 stratospheric ozone). Notwithstanding current uncertainties, the EPA and its predecessor
15 organizations have been active in the management of Nr for a variety of reasons, including decrease
16 in the Nr amount in sewage, control of NO_x to decrease photochemical smog and acid rain, control
17 of Nr inputs to coastal systems, controls on fine particulates in the atmosphere and decrease in Nr
18 leaching and runoff from crop and animal production systems. As beneficial as those efforts have
19 been, they focus on the specific problem without consideration of the interaction of their particular
20 system with other systems downstream or downwind. Given the reality of the nitrogen cascade, this
21 approach may result in short term benefits for a particular system but will also likely only
22 temporarily delay larger scale impacts on other systems. Thus there is a need to integrate N
23 management programs, to ensure that efforts to lessen the problems caused by N in one area of the
24 environment do not result in unintended problems in other areas.

25 **1.4 Charge and scope of this report**

26 In 1973 the Science Advisory Board issued its first report, the 200-page *Nitrogenous Compounds*
27 *in the Environment*. The report addressed sources and effects of nitrogenous compounds,
28 including those from air emissions, animal wastes, crop agriculture, industrial processes, and
29 solid wastes. After concluding that, "At present, all known trends appear to be ones that can be
30 managed and kept within control, if appropriate steps are taken now," the SAB provided
31 recommendations relating to Nr research on and control. Later, the SAB would consider
32 the 1970s to be the first step in environmental protection, characterized by broad agreement on
33 environmental problems and their sources. The second step emerged in the 1980s when the risk
34 assessment/risk management paradigm proposed by the National Research Council in 1983
35 achieved wide acceptance.

1 In *Toward Integrated Environmental Decision-Making*, published in 2000, the SAB articulated a
2 third step in environmental protection -- the framework for integrated environmental decision-
3 making. In this 2000 report, the SAB noted that the 3-phase structure (problem formulation,
4 analysis & decision-making, followed by implementation and evaluation), “believes the
5 complexities involved in putting the concept of integrated decision-making into practice.”

6 The SAB’s interests in N science and integrated environmental protection converged in 2003,
7 when the SAB identified integrated N research and control strategies as an important issue facing
8 the Agency and formed the Integrated Nitrogen Committee to undertake a study of this issue.

9 The charge to the committee was to:

- 10 1. Identify and analyze, from a scientific perspective, the problems N presents in the
11 environment and the links among them;
- 12 2. Evaluate the contribution an integrated N management strategy could make to
13 environmental protection;
- 14 3. Identify additional risk management options for EPA’s consideration; and
- 15 4. Make recommendations to EPA concerning improvements in N research to support risk
16 reduction.

17 In the course of its study, the Integrated Nitrogen Committee held four public face-to-face
18 meetings at which it invited briefings from EPA’s Office of Air and Radiation, Office of
19 International Affairs, Office of Research and Development, and Office of Research and
20 Development; from the Department of Agriculture’s Agricultural Research Service, Cooperative
21 State Research, Extension and Education Service, and the Economic Research Service; and from
22 external organizations such as the Energy Research Centre of the Netherlands, Environmental
23 Defense Fund, International Plant Nutrition Institute, Iowa State University, LiveFuels, and the
24 Soil and Water Conservation Society.

25 Additionally, the INC invited scientists and managers from EPA, other federal agencies, states
26 and localities, academia, non-governmental organizations and the private sector to participate in
27 a October 20-22, 2008 Workshop Meeting on Nitrogen Risk Management Integration.

28

1 **Chapter 2: Behavior of reactive nitrogen in the environment**

2 This chapter identifies and analyzes, from a scientific perspective, the problems Nr presents in
3 the environment and the links among them.

4 **2.1 Introduction**

5 Although N is a major required nutrient that governs growth and reproduction of living
6 organisms, Nr losses from human and natural sources have a profound effect on air, water and
7 soil quality. Human consumption of energy to sustain economic development results in
8 emissions of NO_x to the atmosphere via fossil fuel combustion. Consumption of food to meet
9 nutritional requirements of a growing population results in agricultural emissions of NH₃, urban
10 and industrial emissions of NO_x, and N₂O as well as losses of NO₃⁻ and other N compounds to
11 water bodies due to leaching and runoff. Once released into the atmosphere by either human or
12 natural processes, these Nr compounds undergo transformation through atmospheric reactions
13 (e.g. gas-to-particle conversion), transport associated with wind, and finally wet and dry
14 deposition. Reactive nitrogen lost from agricultural and peopled systems can enter groundwater,
15 streams, lakes, estuaries, and coastal waters where the Nr can also undergo transformation
16 mediated by a wide range of biotic and abiotic processes. The introduction of Nr into
17 agroecosystems provides much of the world's food. The loss of Nr to the environment
18 throughout the food production process and during fossil fuel combustion contributes to many of
19 the major environmental problems of today.

20 This chapter of the report addresses three aspects of the committee's work. The first two are the
21 introduction of Nr into US systems from fossil fuel combustion and from food production
22 (Section 2.2) and the fate of Nr after it is emitted to the atmosphere by fossil fuel combustion or
23 lost to the air, water and soils from agricultural production systems (Section 2.3). The third
24 aspect is the impacts of Nr on humans and ecosystems (Section 2.4) from both a traditional view
25 (i.e., specific effects such as impacts of smog on people and plants) and a more integrated view
26 (i.e., the consequences of Nr on ecosystem services).

27 The issues of Nr in the US environment revolve around the introduction of new Nr by imports,
28 fertilizer production, C-BNF, and fossil fuel combustion, and by its distribution within
29 agricultural system and populated systems and redistribution through losses from those systems
30 to the environment (Figure 3). National-level values for Nr fluxes are displayed in Table 1.
31 Those fluxes that represent the introduction of new Nr into the US are marked with an asterisk.
32 Specific sections of the report will use these values to more clearly determine the flux and fate of
33 Nr in the US.

1

Table 1: Nr fluxes for the US, Tg N in 2002^a

Nr inputs to the <i>Atmospheric</i> environmental systems	<u>Tg N/yr</u>	<u>%</u>
N ₂ O-N emissions	0.8	8
Agriculture - livestock (manure) N ₂ O-N	0.03	
Agriculture - Soil management N ₂ O-N	0.5	
Agriculture - field burning ag residues	0.001	
Fossil fuel combustion - transportation*	0.1	
Miscellaneous	0.1	
NH _x -N emissions	3.1	31
Agriculture: livestock NH ₃ -N	1.6	
Agriculture: fertilizer NH ₃ -N	0.9	
Agriculture: other NH ₃ -N	0.1	
Fossil fuel combustion - transportation*	0.2	
Fossil fuel combustion - utility & industry*	0.03	
Other combustion	0.2	
Miscellaneous	0.1	
NO _x -N emissions	6.2	61
Biogenic from soils	0.3	
Fossil fuel combustion - transportation*	3.5	
Fossil fuel combustion - utility & industry*	1.9	
Other combustion	0.4	
Miscellaneous	0.2	
Total <i>Atmospheric</i> inputs	10.0	100

Nr inputs to the <i>Terrestrial</i> environmental system		
Atmospheric N deposition ^b	6.9	19
Organic N	2.1	
Inorganic no _y -N	2.7	
Inorganic-nh _x -N	2.1	
*N fixation in cultivated croplands	7.7	21
Soybeans*	3.3	
Alfalfa*	2.1	
Other leguminous hay*	1.8	
Pasture*	0.5	
Dry beans, peas, lentils*	0.1	
N fixation in non-cultivated vegetation*	6.4	15
N import in commodities*	0.2	0.3
Synthetic N fertilizers*	15.1	41
(9.4 produced in US*, 5.8 net imports to US*)		
Fertilizer use on farms & non-farms	10.9	
Non-fertilizer uses such as explosives	4.2	
Manure N production	6.0	16
Human waste N	1.3	3
Total <i>Terrestrial</i> inputs	43.5	100
Nr inputs to the <i>Aquatic</i> environmental system		
Surface water N flux	4.8	

1 Table 1 Notes

- 2 a. The Nr estimates in this table are shown with two significant digits or 0.1 million metric tons N per year (or
3 Tg N/yr) to reflect their uncertainty; occasionally this report will show data to more significant digits, strictly
4 for numerical accuracy. Obtaining quantitative estimates of each of the Nr terms and the associated uncertainty,
5 remain a major scientific challenge.
- 6 b. Reducing the uncertainty in total deposition of atmospheric Nr to the surface of the 48 contiguous US
7 remains a scientific and policy priority. Based on observations and models, we estimate 5.9 (range 4 – 9) Tg
8 N/yr total anthropogenic Nr deposition to the entire 48 States (Section 2.3.1.10). The EPA sponsored
9 Community Multiscale Air Quality (CMAQ) Model run yielded a value of 4.8 Tg N/yr. The value shown for
10 the total (6.9 Tg N/yr) reflects the assumption that organo-nitrogen species should be added to the model
11 estimate as 30% of the total.

1 * Terms with an asterisk indicate Nr that is created, highlighting where reactive nitrogen is introduced to the
2 environment.

3 Table 1 Data Sources:

- 4 • Emissions, N₂O-N (EPA Inventory of US Greenhouse Gas Emissions and Sinks)
- 5 • Emissions, NH_x-N (EPA National Emissions Inventory)
- 6 • Emissions, NO_x-N (EPA National Emissions Inventory)
- 7 • Atmospheric deposition, organic N (30% of total atmospheric N deposition, Neff et al.
8 2002)
- 9 • Atmospheric deposition, inorganic NO_y-N & NH_x-N (EPA CMAQ model)
- 10 • N₂ fixation in cultivated croplands (USDA census of agriculture, literature coefficients)
- 11 • N₂ fixation in non-cultivated vegetation (Cleveland and Asner, unpublished data)
- 12 • Synthetic N fertilizers (FAO & AAPFCO)
- 13 • Non-fertilizer uses such as explosives (FAO)
- 14 • Manure N production (USDA census of agriculture, literature coefficients)
- 15 • Human waste N (US Census Bureau population census, literature coefficients)
- 16 • Surface water N flux (USGS SPARROW model; long-term flow conditions)
- 17

18 **2.2 Sources of Nr new to the US environment**

19 **2.2.1 Introduction**

20 Creation of “new” Nr in the environment refers to Nr that is either newly fixed within or
21 transported into the US. This “new” Nr highlights where Nr is introduced into ecosystems.
22 New Nr arises from fossil fuel combustion, food production and materials production (Table 1).

23 Fossil fuel combustion emits Nr (mostly NO_x) to the atmosphere⁴. Fossil fuel combustion
24 introduces 3.5 Tg N/yr and 1.9 Tg N/yr of NO_x-N to the atmosphere from transportation, and
25 utility/other industry sources, respectively (Table 1). Another 0.2 Tg N/yr of NH₃-N and 0.1 Tg
26 N/yr of N₂O-N is emitted from the same sources (Table 1). Thus the total amount of Nr created
27 by fossil fuel combustion is 5.7 Tg N/yr, of which > 90% is in the form of NO_x-N.

28 Synthetic Nr fertilizers are typically produced by the Haber-Bosch process and used primarily in
29 agriculture to support food production. Production of fertilizers within the US introduces Nr into
30 US terrestrial landscapes at the rate of 9.4 Tg N/yr, and net imports of fertilizer via world trade
31 introduce 5.8 Tg N/yr. Of this total (15.2 Tg N/yr), 9.8 Tg N/yr is used as fertilizer on farms and
32 1.1 Tg N/yr is used on non-farms (i.e., residential and recreational turf-grass and gardens, and in

⁴ Nr is generally not formed during combustion of wood and modern biomass because of lower combustion temperatures.

1 explosives used by the mining industry), and 4.2 Tg N/yr is introduced for non-fertilizer uses,
2 such as for production of plastics, fibers, resins, and for additives to animal feed (Table 1).

3 Additional Nr is introduced into the US from cultivation-induced biological nitrogen fixation
4 (BNF) by agricultural legume crops such as soybean and alfalfa (7.7 Tg N/yr), and from imports
5 of N contained in grain and meat (0.15 Tg N/yr) (Table 1).

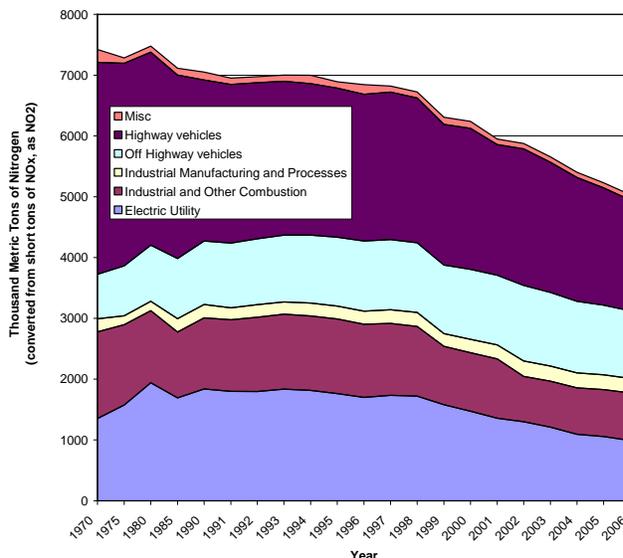
6 Thus in 2002, anthropogenic activities introduced a total of 29 Tg N into the US, mostly in
7 support of food production, although turf production, industrial uses and fossil fuel combustion
8 were also important sources. Natural sources of Nr in the US are BNF in unmanaged landscapes,
9 and lightning. The former contributes 6.4 Tg N/yr (Table 1) and the latter 0.1 Tg N/yr. Clearly,
10 anthropogenic activities dominate the introduction of Nr into the US.

11 Losses of Nr to the environment in the US occur during fossil fuel combustion and food
12 production. The former occurs immediately, as Nr formation during combustion is inadvertent
13 and the Nr, primarily as NO_x, is emitted directly into the atmosphere. The latter occurs through
14 all stages of food production and consumption. The remaining sections of Section 3.2 document
15 the magnitude of the losses from the various components of both energy and food production.

16 **2.2.2 Nr formation and losses from fossil fuel combustion**

17 Fossil fuels such as coal, petroleum, and natural gas provide about 80% of all energy production
18 (based on year 2000). When these fuels are burned at high temperatures, NO_x is formed. The
19 source of N is either the N contained in the fossil fuel or the N₂ that comprises about 80% of
20 atmosphere. Fuel-derived N is important in the case of burning coal (which contains N), while
21 atmospheric-derived N₂ is formed during higher temperature processes that occur when gasoline
22 or diesel fuel is burned in motor vehicles (Table 1). In the US, highway motor vehicles account
23 for the largest anthropogenic source of NO_x at 36% (Figure 4), while off-highway vehicles,
24 electric utilities and industrial processes account for 22%, and 20%, respectively.

1 **Figure 4: US NO_x emission trends, 1970-2006. Data are reported as thousand of metric**
2 **tons of N converted from NO_x as NO₂**



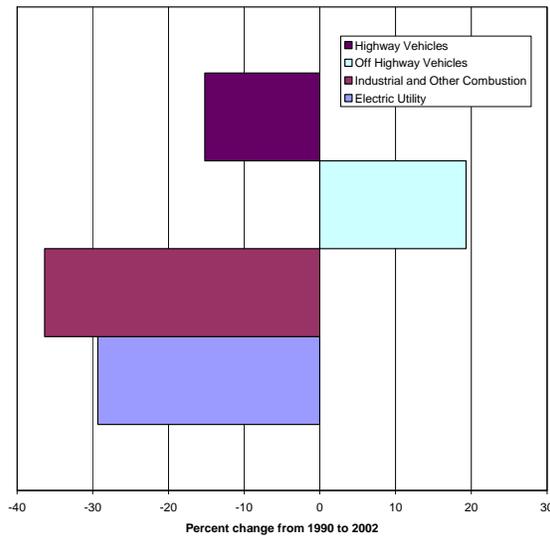
3

4

(Source: <http://www.epa.gov/ttn/chief/trends/index.html>)

5 Figure 4 also illustrates that the amount of NO_x (reported as metric tons of N) released from
6 various fossil fuel sources has decreased dramatically from 1970. Total emissions were on the
7 order of 7,400 metric tons in 1970, decreased to 5900 in 2002, with further decreases in 2006 to
8 5,030 metric tons. Overall this represents a decrease of over 30%. The top sources (highway
9 vehicles, off-highway vehicles, electric utilities, and other industrial and combustion systems)
10 show decreases between 15-30% from 1990 to 2002 (Figure 5). Reductions were the highest for
11 “other” systems followed by electric utilities. These decreases are most likely the result of
12 changes in regulations and control technologies for these stationary systems. To a lesser extent,
13 changes in highway vehicle regulations and the removal of older fleets from the road has resulted
14 in a decrease of approximately 15%. This decrease however, is accompanied by an increase in
15 miles traveled, which suggests that the actual decrease in a single vehicle is larger. Off highway
16 vehicles showed an increase in emissions, potentially due to better quantification of these
17 sources. Sources here include locomotives, marine engines, etc. While some regulations are in
18 place for some of these sources, such as locomotives, further control of these and other sources
19 could decrease emissions. In fact, technological development in the locomotive industry shows
20 that decreases of approximately 70% are possible. Further decreases would require more
21 innovative, expensive methods such as Selective Catalytic Reduction (SCR) with urea injection.
22 Engine manufacturers are also investigating using SCR systems for diesels. However, it must be
23 noted that these systems emit small amounts of NH₃ and must be operated properly to avoid
24 trading off NO_x emissions for NH₃.

1 **Figure 5. Percent reductions in NO_x emissions, 1990-2002, from different sources (off-road,**
2 **on-road vehicles, power generation, etc.)**



3

4 Texas, California, Florida, Ohio, and Illinois emissions (in metric tons of nitrogen as converted
5 from tons of NO_x or NO₂) with the processes listed (Table 2) illustrate the fact that individual
6 state emission scenarios are quite different.

1

2 **Table 2: Top 5 Emitters of N in metric tons (2001 data; based on tons of NO_x as NO₂)**

3 (Source: These data were derived from the 2001 information obtained at:
4 <http://www.epa.gov/air/data/geosel.html>)

	TX	CA	FL	OH	IL
Fuel Combustion-Electric Util.	91,441	8,441	87,489	93,792	59,124
Fuel Combustion - Industrial	98,978	31,237	11,792	17,300	26,481
Fuel Combustion - Other	9,222	21,407	5,707	12,974	10,894
Industrial Processes	25,584	13,786	5,933	8,123	7,122
Highway Vehicles	164,937	182,471	116,889	83,593	78,278
Off-Highway Vehicles	106,162	85,064	38,475	46,239	52,797
Miscellaneous Sources	4,807	7,882	13,110	1,526	999
TOTAL, metric tons	501,151	350,301	279,778	263,561	235,817

5

6 As seen in Table 2, Texas' fuel combustion sources are on the same order as highway vehicles;
7 this is in comparison to California, where vehicles, highway and off-highway are the dominant
8 source (over 75%) for this state. These results are attributed to industries and coal-fired power
9 plants located in Texas. Almost 40% of the power generation in Texas is due to coal-fired
10 plants. On the other hand, California imports most of its coal-fired power and generates its own
11 power predominantly from other sources, such as natural gas (50%), hydro and nuclear (33%).
12 Louisiana and Texas have high emissions due to various industries located in these states. These
13 results illustrate that many sources contribute to the NO_x emitted from energy sources and the
14 number of automobiles is a factor. The number of automobiles is related to the population. The
15 estimated population of California for 2006 is 36.4 million people versus Ohio and Illinois which
16 are on the order of 11-12 million.

17 **2.2.3 Nr inputs and losses from crop agriculture**

18 Agriculture uses more Nr and accounts for more Nr losses to the environment than any other
19 economic sector. Synthetic fertilizers are the largest sources of Nr input to agricultural systems.

1 The next largest source is cultivation-induced BNF (Table 1). The major pathways by which Nr
2 is lost from these systems include NO_3^- losses from leaching, runoff and erosion and gaseous
3 emissions via volatilization of NH_3 and NO_x and nitrification/denitrification. Similar loss
4 pathways occur for Nr that cycles through livestock systems, which also account for a large
5 portion of Nr flux (predominantly as NH_3) in animal agricultural systems (Aneja et al. 2006).
6 Therefore, assessment of Nr impacts on the environment and development of strategies to
7 minimize negative impact must be based on a thorough understanding and accurate accounting
8 of Nr fluxes in both crop and livestock systems, and the trends in management practices that
9 have greatest influence on Nr losses from these systems (Aneja et al, 2008a,c).

10 In the past 60 years, N fertilizers have had a beneficial effect on agriculture both nationally and
11 globally by increasing crop yields. However, the high loading of Nr from agricultural nutrient
12 sources has lead to deleterious effects on the environment, such as decreased visibility from
13 increased aerosol production and elevated N concentration in the atmosphere, ground, and
14 surface waters (Galloway et al. 2003).

15 *2.2.3.1 Nitrogen fertilizer use*

16 Obtaining accurate data on fertilizer use is a critical first step in understanding Nr cycles in
17 agriculture. There are several sources of data reporting fertilizer usage but it is not clear whether
18 data quality is sufficient for assessing environmental impact. Although the Uniform Fertilizer
19 Tonnage Reporting System (UFTRS) was developed to collect fees to fund the consumer
20 protection mission of State Chemists and fertilizer regulatory control officials, it also provides
21 data on fertilizer sales in many states, which in turn are used by many agencies and
22 environmental scientists to estimate consumption and use of nitrogenous fertilizers in the US.
23 The Association of American Plant Food Control Officials (AAPFCO) tallies and publishes the
24 statewide fertilizer sales data annually (Terry et al. 2006), which is one of the most widely used
25 sources of data on fertilizer use. It is typically assumed that fertilizers are used in the same region
26 in which they were sold. The annual state-level data published by AAPFCO, which are based on
27 commercial fertilizer sales and often taxed at the state level (but not in all states), are the only
28 data source available. This state-level data source includes fertilizer sales for both agricultural
29 and non-agricultural purposes. These state-level data must then be allocated to counties, regions,
30 or watersheds in the states, and the algorithms used for this process are based on a number of
31 assumptions that address dealer/farmer storage, inventories, and cross-state sales issues (personal
32 communication, Stan Daberkow, USDA-ERS).

33 The USDA National Agricultural Statistics Service Information (NASS) fertilizer usage data
34 represents another source of information derived from farmer “agricultural chemical use”
35 surveys that provide information in six categories: field crops, fruits and vegetables,
36 nurseries/floriculture, livestock use, and post-harvest application. For each group, NASS
37 collects fertilizer, pesticide, and pest management data every year on a stratified random sample
38 of farmers at the field level

1 ([http://usda.mannlib.cornell.edu/usda/current/AgriChemUsFC/AgriChemUsFC-05-16-](http://usda.mannlib.cornell.edu/usda/current/AgriChemUsFC/AgriChemUsFC-05-16-2007_revision.pdf)
2 [2007_revision.pdf](http://usda.mannlib.cornell.edu/usda/current/AgriChemUsFC/AgriChemUsFC-05-16-2007_revision.pdf)). The NASS report represents another useful data source but also would
3 require extrapolation across reported crop acreage to represent a complete sample of application
4 rates.

5 The UFTRS was not designed to track the source of inorganic nutrients applied to agricultural
6 land on the geographic scale needed for watershed modeling. The system only tracks sales of
7 synthetic fertilizers and not manure or biosolids applied to farmland. In addition, geographical
8 data associated with each sale may or may not be near the actual point of application. However,
9 given either regulatory or legislative changes (data reporting is mandated through each state's
10 fertilizer law), it could be possible to refine the current system used by each state Department of
11 Agriculture to generate more precise data for improved modeling of watershed-scale nutrient
12 mass balances. Those changes would help target interventions and extension programs to
13 improve nutrient management and reduce nutrient losses. The lack of potential funding and the
14 necessity to coordinate all the states involved limit the practicality of such an approach.

15 The state Departments of Agriculture have already made recommendations to improve the
16 reporting system. These include:

- 17 1. an assessment to determine the needs for fertilizer usage data, the accuracy of the current
18 data collection methods, and whether methods require revision to meet highest priority
19 needs,
- 20 2. improvements in the database format and web-based access,
- 21 3. The identification of funding sources to support development of a more accurate,
22 accessible, and comprehensive database system, and
- 23 4. education and outreach to improve precision of reported fertilizer tonnage including a
24 clear distinction between nutrients used in crop, livestock, and non-agricultural
25 operations.

26
27 In addition, the information could be refined to reflect site-specific data layers, although that
28 would require development of a geospatial framework (and legal authority) to encourage
29 reporting at the retail level where it is possible to collect geographic information.

30 The Chesapeake Bay watershed provides a good example of the fertilizer data dilemma. While
31 the fertilizer tonnage that is currently being utilized to calibrate the Chesapeake Bay Program
32 Watershed Model is relatively accurate, the county-specific tonnage may have an accuracy of
33 only ± 20 to 50%. For example, in a recent year, 17% of the reported tonnage had been reported
34 without an identified use and there are indications some tonnage may have been reported more
35 than once through the distribution chain (Chesapeake Bay Scientific Technical Advisory
36 Committee report, Oct. 2007). It is also possible that fertilizer reported for crop agriculture may
37 actually have been used for lawn and turf, forestry, or other non-agriculture applications.

1 Nitrogen fertilizer application data on a specific crop-by-crop basis that can be associated with
2 crop yields and location are essential for assessing both use patterns and efficiency. The USDA-
3 NASS maintains a database on N fertilizer rates applied to the major crops (corn, wheat, cotton,
4 soybeans, and occasionally other crops) based on farmer surveys conducted every other year.
5 These data represent another source of information (“Protocols for Farming Reporting” Mark R.
6 Miller, USDA, NASS).

7 Data derived from NASS farmer surveys include six categories: field crops, fruits and
8 vegetables, nurseries/floriculture, livestock use and post-harvest application. For each group,
9 NASS collects fertilizer, pesticide, and pest management data every year on a stratified random
10 sample of farmers at the field level. One field represents an entire farm for each sample in the
11 field crops survey. Fruit and vegetable information are collected for the entire farm. If the field
12 chosen for sampling has had manure applied in conjunction with inorganic fertilizer, only the
13 inorganic portion will be reported because the survey does not ask about manure. Core crops are
14 surveyed every other year on an even/odd basis for different crops and surveyed states are
15 selected to cover at least 80% of planted acres. NASS is not currently scheduled to resume
16 coverage of corn and other commodity crops until 2010, which is a five year gap. NASS will try
17 to resume its coverage of corn management survey in 2008. This is a critical data gap and it is a
18 problem given the large changes in corn price and production area during this period. Those data
19 have to be available if there is to be progress in assessing fertilizer use and efficiency for major
20 crops in the US USDA NASS must resume their yearly data collection for commodity crops
21 (Chemical Use Survey). Potential environmental impacts of increased N inputs associated with
22 expanded corn acreage for biofuel production cannot be properly evaluated in the absence of
23 such critical nutrient management data.

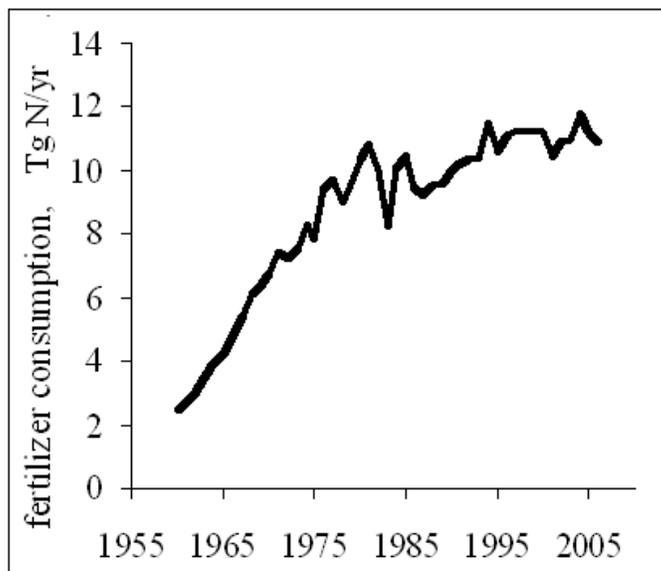
24 Based on these data, USDA has recently released an updated report on fertilizer use that provides
25 data on fertilizer consumption and type of fertilizer used from 1960-2006 (Figure 6) and types of
26 fertilizers used (Table 3). (US Fertilizer Use and Price; Released Friday, October 5, 2007).
27 Share of crop area receiving fertilizer and fertilizer use per receiving acre, by nutrient, are
28 presented for the major producing states for corn, cotton, soybeans, and wheat. Additional data
29 include fertilizer farm prices and indices of wholesale fertilizer price. See
30 <http://www.ers.usda.gov/Data/FertilizerUse/>

1

Figure 6: Fertilizer consumption in the US 1960 to 2006

2

(Source: AAPFCO; 1960 - 2006. www.aapfco.org)



3

Table 3: Sources and amount of nitrogen fertilizers used in the US in 2002.

4

[Data from Terry et al. (2006)]

5

Synthetic Nitrogen Fertilizers	Tg/year	% of total
Other	0.21	2
Urea	2.21	20
N Solutions	2.55	23
Anhydrous NH ₃	2.88	26
DAP, MAP, and NPK blends	2.28	32
NH ₄ ⁺ SO ₄ ²⁻ , NH ₄ ⁺ , Thiosulfate, and Aqua NH ₃ and NH ₄ ⁺ Nitrate	0.76	7
Total	10.89	100

6

1 **Finding 1**

2 Crop agriculture receives 63% of US annual new Nr inputs from anthropogenic sources (9.8 Tg
3 from N fertilizer, 7.7 from crop BNF versus 29 Tg total) and accounts for 58% (7.6 Tg) of total
4 US Nr losses from terrestrial systems to air and aquatic ecosystems, yet current monitoring of
5 fertilizer use statistics by federal agencies is inadequate to accurately track trends in quantities
6 and fate of N applied to major crops and the geospatial pattern by major watersheds.

7 **Recommendation 1:** *Increase the specificity and regularity of data acquisition for fertilizer*
8 *application to major agricultural crops (and also for urban residential and recreational turf) by*
9 *county (or watershed) to better inform decision-making about policies and mitigation options for*
10 *reducing Nr load in these systems, and to facilitate monitoring and evaluation of impact from*
11 *implemented policies and mitigation efforts.*

12 Nitrogen fertilizer use efficiency (NFUE) is critical because higher use efficiency leaves less N
13 remaining to create potential environmental problems. Here and throughout this report we define
14 NFUE as the grain yield per unit of applied N, which is the product of two parameters: (i) the
15 proportion of applied N fertilizer that is taken up by the crop, or N fertilizer recovery efficiency
16 [(RE) in kg N uptake per kg N applied], and (ii) the physiological efficiency with which the N
17 taken up by the crop is used to produce economic yield such as grain or fruit [(PE), kg yield per
18 kg N uptake](Cassman et al., 2002)] All else equal, when higher NFUE is achieved without yield
19 reduction, the crop takes up more of the applied N and incorporates it into its biomass, which
20 leaves less of the applied Nr at risk for losses via leaching, volatilization, or denitrification. Fixen
21 (2005) reports that there is substantial opportunity for increasing NFUE through development
22 and adoption of more sophisticated nutrient management decision aids.

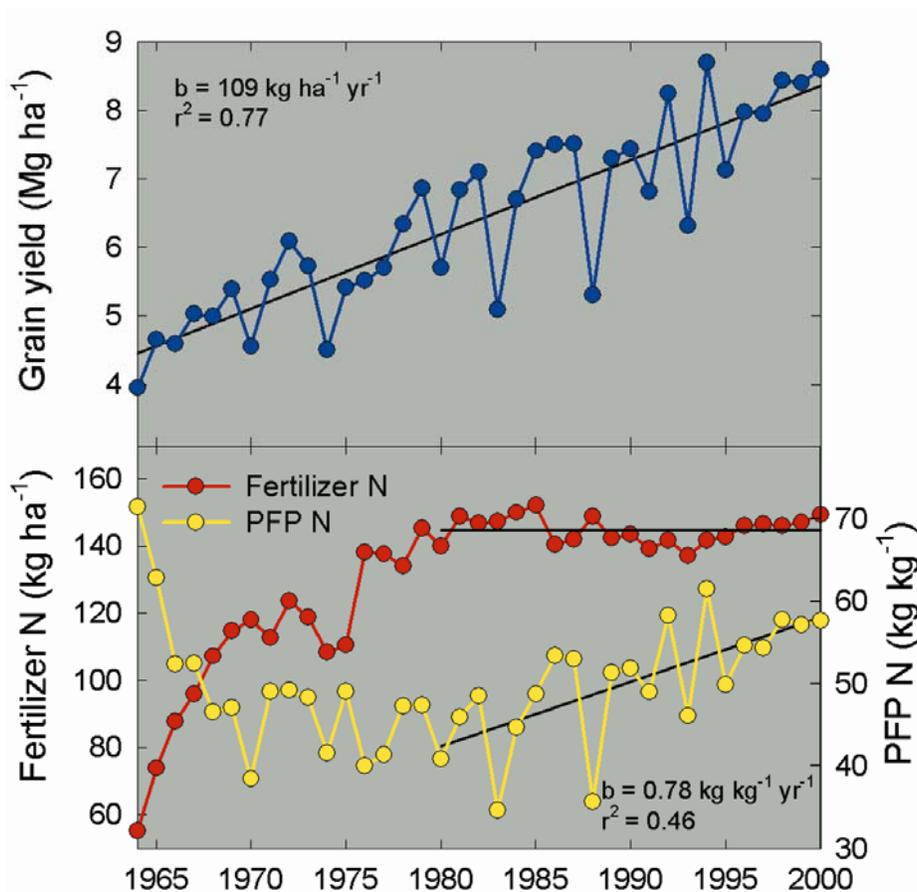
23 In most cropping systems, RE is the most important determinant of NFUE. A recent review of
24 RE for cereals based on field studies around the world, mostly conducted on “small-plot”
25 experiments at research stations, reported mean single year RE values for maize, wheat and rice
26 of 65%, 57% and 46%, respectively (Ladha et al., 2005). However, crop RE values based on
27 actual measurements in production-scale fields are seldom greater than 50% and often less than
28 33%. For example, a review of RE in different cropping systems, estimated average recoveries
29 of 37% for maize in the north central US (Cassman et al., 2002).

30 However, there are relatively few data that provide direct measurement of N fertilizer recoveries
31 by our major field crops under production-scale conditions and reducing the uncertainty in
32 estimates of N fertilizer RE is fundamental for prioritization of research and education
33 investments, both in the public and private sectors. While management can substantially improve
34 RE on average, in any given year weather will always be an uncontrolled factor that can
35 significantly influence system efficiency through effects on crop growth vigor and ability to
36 acquire applied nutrients, and on losses of nutrients due to runoff, denitrification, and leaching
37 that can occur in periods of excessive rainfall.

1 Although total N fertilizer use in the US has leveled off in the past two decades (Figure 6), yields
2 of all major crops have continued to increase. Because crop yields are closely related to N
3 uptake (Cassman et al., 2002), these trends imply a steady increase in NFUE and reduced N
4 losses because more of the applied N is held in crop biomass and harvested grain. Greater NFUE
5 has resulted from two factors. The first factor is a steady improvement in the stress tolerance of
6 corn hybrids (Duvick and Cassman, 1999) that increase crop growth rates and allows sowing at
7 higher plant densities, which together accelerate the establishment of a vigorous root system to
8 intercept and acquire available N in the soil profile. The second factor is the development and
9 adoption of technologies that improve the congruence between crop N demand and the N supply
10 for indigenous soil resources and applied N. Examples of such technologies include soil testing
11 for residual nitrate and adjusting N fertilizer rates accordingly, split N fertilizer applications,
12 fertigation (the application of nutrients through irrigation systems), site-specific management,
13 and new fertilizer formulations (e.g. controlled release, nitrification inhibitors). For maize,
14 which receives the largest share of total N fertilizer in the US, there has been a 38% increase in
15 NFUE since 1980 (Figure 7).⁵ Similar improvements have been documented for rice production
16 in Japan and for overall crop production in Canada.

⁵ N fertilizer use efficiency (NFUE) is calculated as the ratio of grain yield to the quantity of applied N fertilizer (kg grain/kg applied N).

1 **Figure 7: Trends in US corn yields, N fertilizer rates applied to corn, and N fertilizer**
2 **efficiency quantified by the partial factor productivity (PFP) for applied N (kg grain**
3 **produced per kg N fertilizer applied) (Cassman et al., 2002).**



4
5
6 Despite these steady improvements, current levels of N fertilizer uptake efficiency appear to be
7 relatively low (Cassman et al., 2002), although data from production-scale studies are few
8 (Cassman et al., 2002). Most farmers do not use best management practices (BMPs) with regard
9 to nitrogen fertilizer management. For example, a recent USDA-ERS AREI report indicates that
10 a majority of farmers still apply N in the fall, which gives the lowest fertilizer uptake efficiency
11 and highest Nr losses compared to application in spring or during the crop growth period
12 (USDA, ERS, 2006). This situation suggests substantial potential for improvement in NFUE and
13 an associated reduction in Nr losses from crop agriculture. One potential development is the use
14 of controlled release fertilizers that emit N in congruence with crop demand during the growing
15 season. Although such fertilizers are already in use on high value horticultural crops, they are
16 currently too expensive for lower value commodity grains such as corn, rice, or wheat. Such
17 “smart” fertilizers can increase NFUE where there is high risk for N losses in cereal systems that
18 receive the total amount of applied N in one or two large doses.

1 As producers have increased yields in commodity crops significantly over the past 25 years, the
2 question arises whether university recommendations for nutrient applications are still current.
3 Many university recommendations are now 20 to 25 years old. As a corollary to this problem,
4 numerous environmental models of nutrient pollution are still utilizing older yield estimates,
5 which often underestimate crop nutrient uptake and overestimate nutrient losses (Robert
6 Burgholzer, cited in Understanding Fertilizer Sales and Reporting Information, *Workshop*
7 *Report, Oct. 2007*).

8 A systematic effort needs to be made to update those data. The concept of NFUE should be
9 emphasized as a way to address the need to balance economic *and* environmental goals. In fact,
10 the development and adoption of technologies that improve nitrogen fertilizer efficiency can
11 contribute to more profitable cropping systems through a reduction in fertilizer costs. For
12 example, average NFUE in the US required 0.45 kg of applied N to produce 19.1 kg of grain
13 yield in 1980, whereas that same amount of N produced 26.5 kg of grain in 2000 (units
14 converted from Figure 7). This gain in efficiency means that it is possible to achieve the 2004 US
15 average corn yield of about 150 bushels per acre with 144 lbs of applied N fertilizer based on the
16 nitrogen fertilizer efficiency achieved in 2000, versus about 200 lbs of N fertilizer at the 1980
17 efficiency level. At a cost of \$0.40 per pound of applied N, this reduction in N fertilizer input
18 requirements represents a saving of about \$22 per acre.

19 Nitrogen's strong positive impacts on yields in crops (e.g. corn) creates a strong economic
20 incentive for its use. Nitrogen costs have increased dramatically since Hurricane Katrina, while
21 corn prices have also increased dramatically with the increase in corn-based ethanol plants.
22 However, the critical factor is the corn-to-fertilizer price ratio. If corn brings \$4.00 per bushel
23 (25.5 kg) and nitrogen costs \$0.40 a pound (0.45 kg), this is a 10 to 1 price ratio – not different
24 from the \$2.00 corn and \$0.20 nitrogen ratio that was typical from 2000-2005. There are also
25 other critical factors in the farmer's nitrogen application decisions such as yield at the margin
26 and weather. In the corn belt, one or two years in five may provide extremely favorable weather
27 for corn production. A producer may view applying some extra nitrogen, hoping for good
28 weather, as a reasonable economic gamble. If the yield is more than half a bushel (12.7 kg) of
29 corn per pound (0.45 kg) of N at the margin or if there is more than one extremely good year in
30 five, the farmer comes out ahead.

31 Realistically, few farmers calculate their marginal returns from additional N in good years versus
32 average, but the high corn-to-fertilizer price ratio encourages some farmers to plan for a good
33 year and consider a larger N application than might otherwise be appropriate for the N utilization
34 in the four years of lower yield. This presents a real dilemma if the policy goal is to reduce N
35 losses, especially in the four years of average or lower yields. Meeting this challenge will require
36 approaches such as the development of real-time, in-season, decision-making tools that allow
37 crop producers to use N fertilizer rates for average yields at planting and during early vegetative
38 growth, and a final top-dressing as required to meet any additional N demand above this amount
39 due to favorable climate and soil conditions that support higher than average yields (Cassman et

1 al, 2002; Cassman, 1999). Robust crop simulation models using real-time climate data at a
2 relatively localized geographic scale will be required to develop such tools.

3 Another option is to develop new, alternative crop production systems that require less N
4 fertilizer. Such systems may employ legume cover crops, more diverse crop rotations, and
5 tighter integration between crop and livestock production to achieve greater reliance on N inputs
6 from legume N fixation and recycling of N in manure and compost. At issue, however, is
7 whether such systems actually reduce Nr losses to the environment because the same loss
8 mechanisms and pathways operate on N from both commercial fertilizer and organic sources.
9 Also at issue is the indirect land use change impact from widespread adoption of these more
10 diverse cropping systems because they have reduced crop yields per unit land area compared to
11 more simplified crop rotations such as corn-soybeans that receive N fertilizer. Lower yields
12 would require more land in production to meet food demand. Therefore, a key issue is whether
13 the tradeoff in reduced N fertilizer inputs to more diverse crop rotations with organic N inputs
14 would actually result in less Nr losses compared to conventional cropping systems that require
15 less land to produce the same amount of crop output.

16 **Finding 2**

17 Nr inputs to crop systems are critical to sustain crop productivity and soil quality. Moreover,
18 given limited land and water resources, global population growth and rapid economic
19 development in the world's most populous countries, the challenge is to accelerate increases in
20 crop yields on existing farm land while also achieving a substantial increase in N fertilizer
21 uptake efficiency. This process is called "ecological intensification" because it recognizes the
22 need to meet future food, feed, fiber and energy demand of a growing human population while
23 also protecting environmental quality and ecosystem services for future generations (Cassman,
24 1999). More diverse cropping systems with decreased Nr fertilizer input may also provide an option on a
25 large scale if the decrease in Nr losses per unit of crop production in these diverse systems can be
26 achieved without a decrease in total food production, which would trigger indirect land use change to
27 replace the lost production and negate the benefits.

28 **Recommendation 2:**

- 29 a) *Data on NFUE and N mass balance, based on direct measurements from production-*
30 *scale fields, are required for the major crops to identify which cropping systems and*
31 *regions are of greatest concern with regard to mitigation of Nr load and to better focus*
32 *research investments, policy development, and prioritization of risk mitigation strategies.*
33 b) *Promote efforts at USDA to: (i) investigate means to increase the rate of gain in crop*
34 *yields on existing farm land while increasing N fertilizer uptake efficiency and (ii)*
35 *explore the potential for more diverse cropping systems with lower N fertilizer input*
36 *requirements so long as large-scale adoption of such systems would not cause indirect*
37 *land use change.*

1 c) *EPA should work closely with the US Department of Agriculture (USDA), Department of*
2 *Energy (DOE), and the National Science Foundation (NSF) to help identify research and*
3 *education priorities for prevention and mitigation of Nr applied to agricultural systems.*
4

5 *2.2.3.2. Biological fixation in cultivated croplands.*

6 Reactive nitrogen is also introduced to the landscape in significant quantities via BNF in
7 cultivated crop lands. Management of biologically fixed N, insofar as it is possible, is
8 proportionally as critical a task as the management of synthetic N because Nr from BNF is prone
9 to the same loss pathways as Nr from commercial fertilizers. To quantify BNF due to human
10 cultivation of crops, the committee calculated the annual agricultural fixation for 2002 using crop
11 areas and yields reported by the Census of Agriculture (2002). The committee multiplied the
12 area planted in leguminous crop species by the rate of N fixation specific to each crop type,
13 assigning rates based on a literature review, as summarized in Table 4 below and shown relative
14 to other inputs in Table 1. Annual nitrogen inputs to cropping system from BNF by legume
15 crops was 7.7 Tg N/yr in 2002, accounting for ~15% of the overall Nr inputs to the terrestrial
16 landscape from all sources and 20% of the agricultural sources (Table 1). Soybean and alfalfa
17 contributions are the most important agricultural legumes in terms of nitrogen input and
18 contribute 69% of total BNF inputs in US agriculture.

1 **Table 4: Estimates of nitrogen input from biological nitrogen fixation (from major legume**
 2 **crops, hay, and pasture)**

Nr fixation in cultivated croplands

	production area, Mha	rate, kg/ha/yr	Tg N/yr	% of total
Soybeans	29.3	111	3.25	42
Alfalfa	9.16	224	2.05	27
Other leguminous hay	15.4	117	1.80	23
Western pasture	161	1	0.16	2
Eastern pasture	22.0	15	0.33	4
Dry beans, peas, lentils	0.88	90	0.08	1
Total			7.67	100

3 *Updated estimate for soybean based on a generalized relationship between soybean yield and the
 4 quantity of N fixation (Salvagiotti et al., 2008). Other values from Boyer et al. 2002.

5 *2.2.3.3. Emissions factors and losses from fertilizers and organic nitrogen sources.*

6 Agriculture is a significant contributor of Nr inputs into the atmosphere. Nitrogen fertilizer losses
 7 vary greatly due to differences in soil properties, climate, and the method, form, amount, timing
 8 and placement of applied nitrogen (Cassman et al., 2002). In addition, any factor that affects crop
 9 growth vigor and root system function also affects the ability of the plant to recover applied N
 10 efficiently. For example, denitrification can range from 0-70% of applied N (Aulakh et. al,
 11 1992). This process is mediated by heterotrophic, facultative anaerobic soil bacteria that are
 12 most active under warm, wet soil conditions; they have low activity in dry sandy soils.

13 Despite this variation, watershed, regional and national assessments of carbon and N cycling
 14 often rely on average values for losses from each pathway. For example, the Intergovernmental
 15 Panel on Climate Change (IPCC) assumes that 1% of applied N fertilizer (uncertainty range of
 16 0.3-3.0%) is lost from direct emissions of N₂O at the field level due to denitrification, based on
 17 analysis of all appropriate scientific publications that report these losses for specific crops and
 18 cropping systems (IPCC, 2007). The same 1% default emission factor for field-level N₂O
 19 emission is applied to other N inputs from crop residues, organic amendments such as manure,
 20 and from mineralization of native soil organic matter. Data from scores of field studies were

1 used to obtain this average value. A number of recent studies confirm that N₂O losses during the
2 growing season at the field level represent <1% of the applied nitrogen—even in intensive, high-
3 yield cropping systems (Adviento-Borbe et al., 2006). Despite these average values, it is also
4 clear that N₂O losses can vary widely even within the same field and from year to year due to
5 normal variation in climate and crop management (Parkin and Kaspar, 2006; Snyder, 2007).

6 Additional indirect N₂O emissions result from denitrification of volatilized NH₃ deposited
7 elsewhere or from NO₃⁻ lost to leaching and runoff as the Nr cascades through other ecosystems
8 after leaving the field to which it was applied. Here the IPCC assessment protocol assumes that
9 volatilization losses represent 10% of applied N, and that N₂O emissions for these losses are 1%
10 of this amount; leaching losses are assumed to be 30% of applied nitrogen and N₂O emissions
11 are 0.75% of that amount (IPCC, 2007). Therefore, the IPCC default value for total direct and
12 indirect N₂O emissions represents about 1.4% of the applied N from fertilizer. By the same
13 calculations, 1.4% of the N in applied organic matter, either as manure or compost, or in recycled
14 crop residues, is also assumed to be emitted as N₂O.

15 Others have estimated higher average N₂O losses of 3-5% of applied nitrogen fertilizer based on
16 global estimates of N₂O emissions from recycling of Nr (Crutzen et al., 2008), as opposed to the
17 field-based estimates that form the basis of IPCC estimates. Because N₂O is such a potent
18 greenhouse gas, and given the more than 2-fold difference in estimates of N₂O losses, there is a
19 critical need to improve understanding and prediction of N₂O losses from agricultural systems.
20 N₂O emissions in the US are estimated to be 0.78 Tg N/yr (Table 5) (EPA, 2005).

1

Table 5: N₂O emissions in the US, 2002

	<u>Tg N/yr</u>	<u>%</u>
Agricultural Soil Management	0.54	69
Manure Management	0.03	4
Mobile Combustion	0.09	12
Stationary Combustion	0.03	4
Nitric & Adipic Acid Production	0.05	6
Wastewater Treatment	0.02	2
Other	0.02	2
Total	0.78	100

2

3 Biogenic NO_x emissions from croplands are on the order of 0.5% of fertilizer input—much more
 4 than this in sandy soils and less as clay content increases (Aneja et al. 1996; Sullivan et al. 1996;
 5 Veldkamp and Keller. 1997; Civerolo and Dickerson, 1998). However, NO_x emissions by
 6 agricultural burning are relatively unimportant. Ammonia volatilization of N from applied
 7 fertilizer can be the dominant pathway of N loss in rice soils and can account for 0->50% of the
 8 applied N depending on water management, soil properties and method of application (citations
 9 within Peoples et al. 1995). Ammonia volatilization can be of the same range in upland cropping
 10 systems, with largest losses occurring typically on alkaline soils (Peoples et al. 1995). The IPCC
 11 (2007) uses a value of 10% of synthetic fertilizer N application and 20% of manure N as
 12 estimates of average NH₃ volatilization.

13 Taken together, N losses from all forms of direct gaseous emissions forms from crop production
 14 systems can represent a substantial portion of applied N fertilizer when soil conditions favor such
 15 emissions and there is a lack of synchrony between the amount of N applied and the immediate
 16 crop demand (Goulding, K., 2004). Therefore, achieving greater congruence between crop
 17 demand and the N supply from fertilizer is a key management tactic to reduce N losses from all
 18 sources. Success in reducing N losses and emissions from agriculture will depend on increased
 19 efforts in research and extension to close gaps in our understanding of N cycling and
 20 management in crop production, especially as systems further intensify to meet rapidly
 21 expanding demand for food, feed, fiber, and biofuel.

1

2 **Finding 3**

3 Nitrous oxide emissions from the Nr inputs to cropland from fertilizer, manure, and legume
4 fixation represent a large proportion of agriculture’s contribution to greenhouse gas emissions,
5 and the importance of this source of anthropogenic greenhouse gas will likely increase unless
6 NFUE is markedly improved in crop production systems. Despite its importance, there is
7 considerable uncertainty in the estimates of nitrous oxide emissions from fertilizer and research
8 must focus on reducing this uncertainty.

9 **Recommendation 3:** *The committee recommends that EPA ensure that the uncertainty in*
10 *estimates of nitrous oxide emissions from crop agriculture be greatly reduced through the*
11 *conduct of EPA research and through coordination of research efforts more generally with other*
12 *agencies such as USDA, DOE, and NSF.*

13 *2.2.3.4. Impact of biofuel production capacity on Nr flux in agriculture*

14 The current transportation system in the US requires enormous amounts of liquid motor
15 fuels at a time when petroleum use exceeds petroleum discovery. Hence, the price of petroleum
16 has increased substantially during the past 10 years, and most of the world’s petroleum reserves
17 are located in politically unstable countries. This situation provides strong motivation for
18 investment in biofuels made from crops,⁶ and a number of countries have enacted favorable
19 policies and incentives to foster expansion of biofuel production capacity. In the US, ethanol
20 production from corn has more than doubled to 41 billion liters/yr since 2005, and the renewable
21 fuel standard established in the 2007 EISA will support expansion of this capacity by another 16
22 billion liters/yr by 2015. Brazil is rapidly expanding its production of sugarcane ethanol, Europe
23 and Canada are expanding biodiesel production from canola oil, and Indonesia and Malaysia
24 have plans to increase biodiesel production from palm oil.

25 When petroleum prices are high, corn has greatest value as feedstock for biofuel rather
26 than for human food or livestock feed (CAST, 2006). Because of the steady rise in petroleum
27 prices from mid-2005 until mid-2008 and the 2007 EISA mandate,, the amount of corn used for
28 ethanol has increased rapidly; about 30% of US corn production will be used for ethanol in 2008,
29 which represents about 10% of global corn supply. This increased demand puts a floor under
30 both corn prices and ethanol prices, which have risen substantially since the first half of 2005.
31 Higher corn prices send powerful signals to corn producers to increase production. Farmers have
32 responded by increasing corn acreage by millions of acres since 2006, and they may be
33 motivated to increase N fertilizer rates to boost yields. However, N fertilizer prices have also
34 risen so the net impact of expanded biofuel production on actual N rates used by crop producers

⁶ In addition to crops, biofuels can be made from algae and forest wood waste products.

1 is uncertain. Production of large amounts of distillers grains co-product is also changing the way
2 in which livestock feed rations are formulated, which in turn could have a large influence on the
3 cycling of N in cattle manure (Klopfenstein et al., 2008).

4 **Finding 4**

5 Rapid expansion of biofuel production is changing the cost-benefit ratio of N fertilizer use in
6 crop production and also changing the nutrient profile of livestock diets with consequences for
7 effective management of Nr.

8 **Recommendation 4:** *EPA should join with USDA and DOE to understand and predict the*
9 *impact of biofuel production on maximizing the N efficiency of both crop and livestock*
10 *production systems and develop strategies for avoiding increased Nr load in the environment as*
11 *a result of current and future expansion of biofuel production from corn and other “second*
12 *generation” biofuel feedstock crops.*

13 **2.2.4. Nr inputs and losses from animal agriculture**

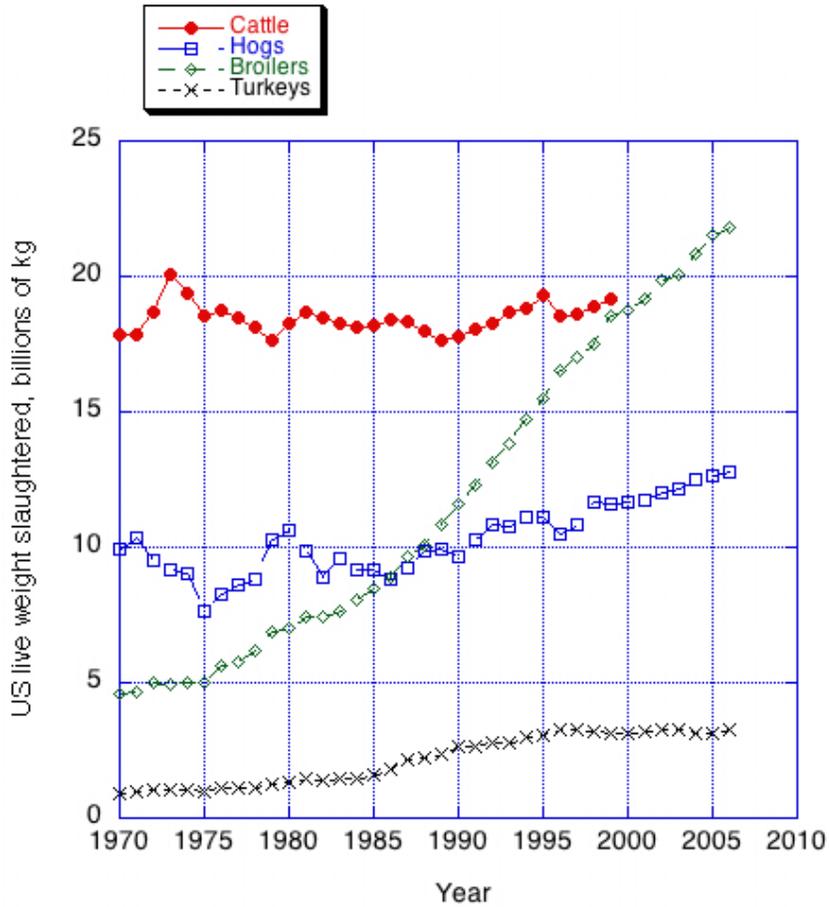
14 In the US, domestic animals produce 6.0 Tg N/yr in manure and are the largest source of
15 atmospheric NH₃-N (1.6 Tg N/yr) (Table 1). Livestock also contribute to N₂O-N emissions,
16 though in much smaller proportions (~4% of total US N₂O-N emissions).

17 *2.2.4.1 Trends in Animal Agriculture*

18 While animal production has been increasing since World War II, this report will emphasize the
19 period from 1970 to 2006. The production of chicken broilers increased by more than four fold
20 from 1970 to 2006 (Figure 8) and milk production increased by nearly 60% in this time period
21 (Figure 9). Turkey production doubled and pork production increased about 25%, while meat
22 from cattle (beef and dairy) remained constant (Figure 8).

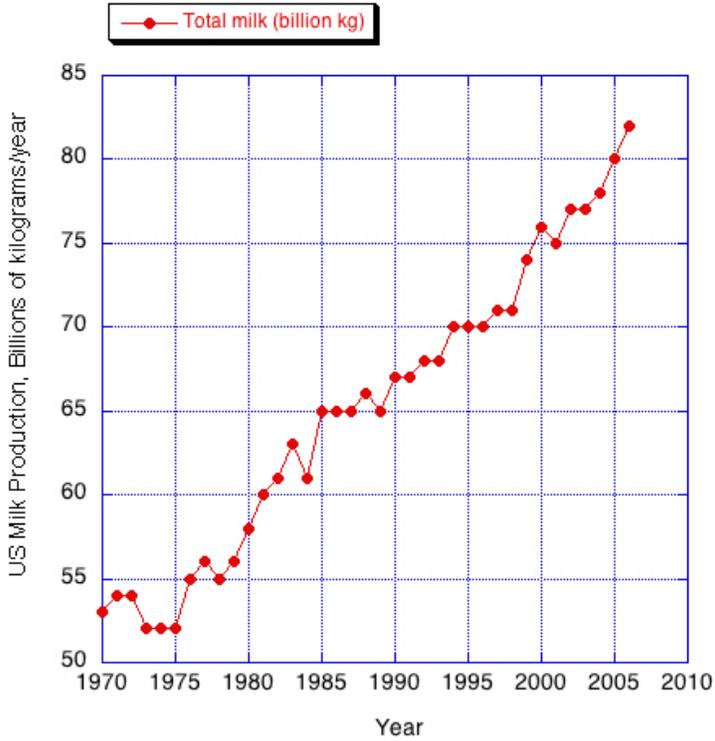
1 **Figure 8: Meat production from 1970 to 2006. Source: USDA-NASS, Census Reports**

2 (Data on cattle not taken after 1999)



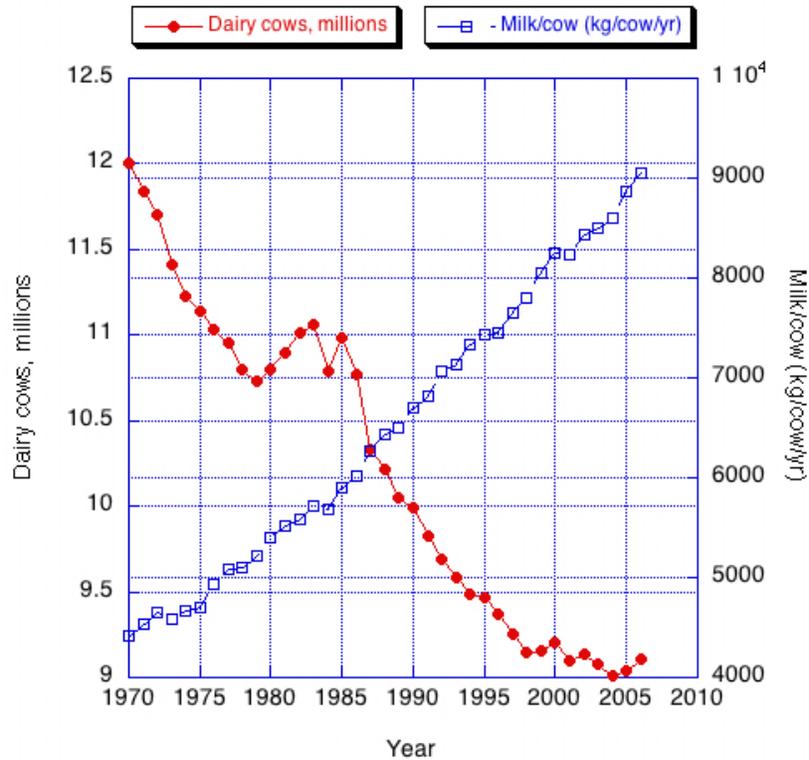
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4 Another trend in animal production has been for fewer animals to produce more animal products.
5 For example, the 60% greater amount of milk produced in 2006 compared to 1970 required 25%
6 fewer cows (Figures 9 and 10). Animal inventories declined by 10% for beef brood cows from
7 36 million head in 1970 to 33 million head in 2006, and the inventory of breeder pigs and market
8 hogs declined 8% from 673 million head to 625 million head in the same period, even with
9 similar or greater annual meat production. This trend resulted from greater growth rates of
10 animals producing more meat in a shorter amount of time. In 1970, broilers were slaughtered
11 after 80 days on feed at 1.7 kg live weight, but by 2006 the average weight was 2.5 kg after only
12 44 days on feed (NASS-USDA, 2007).

1 **Figure 9: Milk production from 1970 to 2006. Source: USDA-NASS, Census Reports.**



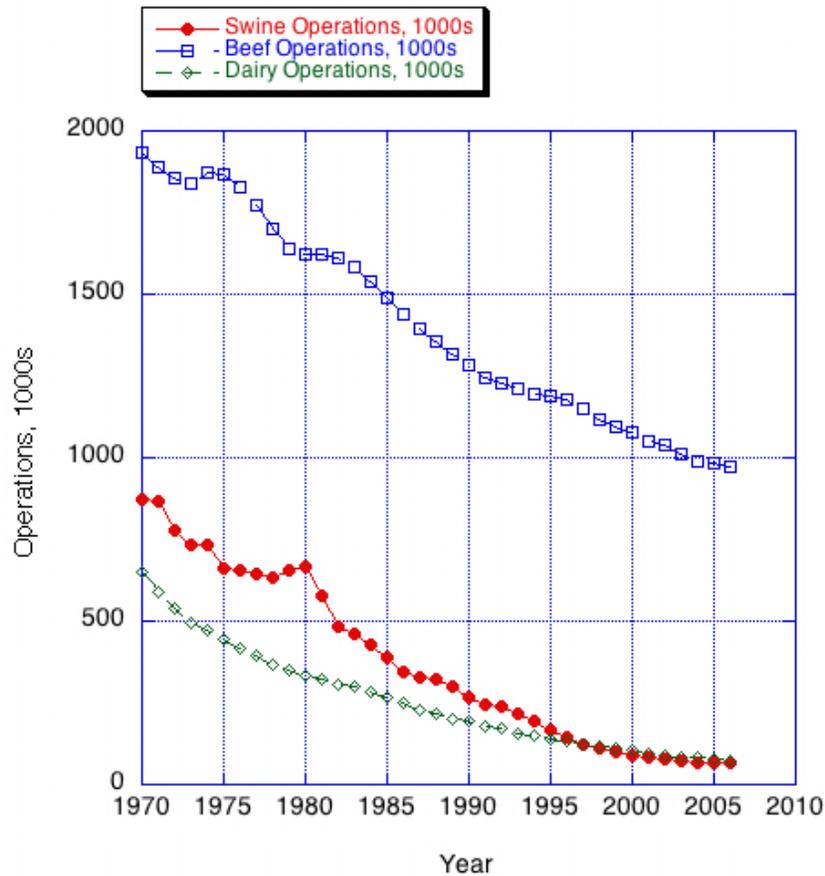
2

1 **Figure 10: US Inventory of mature dairy cows and milk production per cow from 1970 to**
2 **2006. Source: USDA-NASS, Census Reports.**



3
4 Another trend in animal agriculture has been the increased size and smaller number of animal
5 operations, which results from the mechanization of agricultural practices and increased
6 specialization. There were only 7% as many swine operations and 11% as many dairy operations
7 in 2006 as there were in 1970 (Figure 11). There were half as many beef operations in 2006 as
8 in 1970, but beef operations also expanded in size while smaller producers held jobs off the farm.

1 **Figure 11: Number of animal operations in the US from 1970 to 2006. Source: USDA-**
2 **NASS, Census Reports.**



3
4 All of these trends show an increase in management and labor efficiency to produce a similar or
5 greater amount of animal products. Also, because animal production is more concentrated on
6 fewer farms with greater specialization, fewer crops are produced on those farms. As a result, it
7 is increasingly common to have more manure nutrients produced on a livestock farm than can be
8 used efficiently as fertilizer for crops on that farm. Therefore, unless the manure is applied over a
9 larger crop area, the resulting over-application of manure on the livestock farm can reduce the
10 subsequent efficiency of its utilization and result in greater nutrient losses.

11 *2.2.4.2. Impact of livestock production trends on nitrogen use efficiency*

12 The trends have both positive and negative environmental impacts. One of the significant
13 positive impacts is that with smaller animal inventories producing greater quantities of animal
14 products, there is an improved efficiency of nitrogen utilization per product produced. This
15 effect is partly the result of effectively reducing maintenance requirements during production.
16 The requirements for feeding animals can be divided into two components: maintenance and
17 production. The maintenance component is that feed which is used to keep the animal alive and
18 healthy so that production is possible. The production component includes feed that is converted

1 to animal protein and waste due to the inefficiencies of these conversions. The maintenance
2 component depends upon the number of animals, each animal's mass, and the time the animal is
3 on feed. Thus, the maintenance requirement is diluted by faster growth rates and greater body
4 weight at slaughter. The increases in production rates over time have lead to greater efficiencies
5 in N and P utilization for animal production and lower amounts of nutrients excreted per unit of
6 animal protein produced.

7 Public concerns about the potential environmental and health effect of air emissions from
8 CAFOs expand the impacts of food production beyond those associated with traditional
9 agricultural practices (NRC, 2001). Increased emissions of N compounds from animal
10 agriculture into the atmosphere may lead to increased odor and interact in atmospheric reactions
11 (e.g. gas-to-particle conversion) (Baek et al. 2004a; Baek and Aneja 2004b). These are then
12 transported by wind and returned to the surface by wet and dry deposition processes, which may
13 have adverse effects on human health and the environment (McMurry et. al, 2004; Aneja et. al,
14 2006, 2008a, b, c; Galloway et. al, 2008).

15 Adverse effects include aerosol formation, soil acidification, eutrophication, loss of biodiversity,
16 and the neutralization of acids produced by sulfur and nitrogen oxides. Aerosol formation occurs
17 when HNO_3 reacts with basic compounds, and NH_3 reacts with acidic compounds. Ecosystem
18 acidification can occur when HNO_3 is deposited from the atmosphere. In addition, acidification
19 can also occur when NH_x is deposited due to the production of HNO_3 from nitrification via soil
20 microbes. Soil acidification occurs when NO_3^- or NH_4^+ deposits on soils with low buffering
21 capacity, which can cause growth limitations to sensitive plant species. Deposition of NO_3^- or
22 NH_4^+ also causes eutrophication (i.e. an over-abundance of nutrients), which can promote
23 harmful algal growth leading to the decline of aquatic species. In fact, volatilized NO_3^- can travel
24 hundreds of miles from its source affecting local and regional biodiversity far from its origin
25 (Aneja et al. 2008b; James, 2008).

26 The potential for reduced environmental impact from Nr in livestock systems depends on the
27 proportion of the total intake attributable to maintenance costs. The commonly used tables for
28 diet formulation published periodically by the National Research Council (NRC) for various
29 animal commodities can be used to track diet formulation practices and assumptions regarding
30 maintenance and production requirements. About one third of the energy intake recommended
31 for growing broilers was assumed to be needed for maintenance (NRC, 1994) but protein
32 requirements were not divided between maintenance and production. For example, a dairy cow
33 producing 40 kg milk per annum would divert about 25% of its energy and 12% of its protein to
34 maintenance (NRC, 1989).

35 In terms of nutritional efficiency of a herd or flock, maintenance of a productive phase (e.g.
36 growth, lactation) also requires maintenance of a reproductive phase of the animals' life cycle.
37 In other words, the actual nutritional maintenance cost of a herd or flock is greater than it is for
38 productive individuals only. For example, milk production requires non-lactating cows and

1 heifers in the herd which do not produce milk but which consume nutrients. These additional
2 maintenance costs are lower for broiler flocks than for cattle.

3 **Finding 5**

4 There are no nationwide monitoring networks in the US to quantify agricultural emissions of
5 greenhouse gases, NO, N₂O, reduced sulfur compounds, VOCs, and NH₃. In contrast there is a
6 large network in place to assess the changes in the chemical climate of the US associated with
7 fossil fuel energy production, ie the National Atmospheric Deposition Program/National Trends
8 Network (NADP/NTN), which has been monitoring the wet deposition of sulfate (SO₄²⁻), NO₃⁻,
9 and NH₄⁺ since 1978.

10 **Recommendation 5:** *The status and trends of gases and particulate matter emitted from*
11 *agricultural emissions, e.g., NO₃⁻ and NH₄⁺ should be monitored nationwide by a network of*
12 *monitoring stations.*

13 2.2.4.3. *Changes in feeding practices*

14 From 1970 to 2006, several feeding practices were changed for diets fed to livestock. In 1989
15 and 1996, the NRC introduced the idea of dividing the form of protein fed ruminants into that
16 which is degraded by rumen microorganisms and that which passes through the rumen to be
17 digested directly in the stomach and small intestine. Feeding ruminants with attention to rumen
18 degraded and rumen undegraded protein decreases the amount of protein fed by 10 to 15% for a
19 given protein requirement. For poultry and swine, manufactured amino acids were added to
20 diets, decreasing the need for protein by 30%. Today, two amino acids (lysine and methionine),
21 coated in a way to prevent degradation in the rumen, are sometimes added to dairy cattle diets
22 thereby decreasing protein intake by another 15% (NRC, 2001). Phytase added to swine and
23 poultry diets in the past decade has decreased phosphorus feeding by 20 to 50% with some of the
24 decrease attributed to simply better understanding phosphorus requirements

25 It is difficult to estimate the combined effects of changes in feeding practices, but for
26 calculations on changes in manure N, we assume improvements in both production rates and
27 ration formulation. In the case of beef cattle diet formulation, the changes in feeding practices
28 were determined by comparing the NRC 1976 recommendations with NRC 2996
29 recommendations Surprisingly, NRC 1996 recommended greater total crude protein compared
30 to NRC 1976 despite formulating for rumen degraded and undegraded protein and considering
31 amino acid content. Therefore, improved diet formulation did not decrease N intake for beef in
32 this time range but the effect of reduced maintenance did improve efficiency of N utilization.

33 2.2.4.4. *Nitrogen excretion*

34 Nitrogen excretion as fraction of animal production decreased from 1970 to 2006 (Table 6).
35 However, in cases where the total amount of animal production in the US increased substantially

1 (e.g. broilers), total N excretion increased. The decrease in N excretion per unit of animal
 2 productivity was estimated by calculating the effects of changes in feeding practices and
 3 reduction of maintenance as described previously.

4 **Table 6: Manure N excreted per kg production (g/kg) and per total US (Tg /yr)**

Commodity*	1970		2006	
	g/kg product	Total US	g/kg product	Total US
Milk	17	0.89	11	0.92
Pork, live weight	57	0.56	42	0.54
Broilers, live weight	56	0.26	46	1.00
Beef, live weight	123	1.2	110	1.3

5 *Does not include manure produced for reproduction of stock (e.g. growing dairy heifers, breeder
 6 pigs).

7 For broilers, data are available to more accurately estimate the effect of changes in feeding and
 8 genetics on N excretion over time. However, these data do not represent the time period of
 9 interest in this report. Havenstein et al. (1994) compared a 1957 strain of broiler fed a 1957 diet
 10 to a 1991 strain fed a 1991 diet. Based on the reported N intake and production data, there was a
 11 51% reduction in N excreted between these diets (Kohn, 2004).

12 Similarly, Kohn (2004) compared N excreted by US dairy cows in 1944 and 2001. In 1944, the
 13 historically largest herd of dairy cattle in the US (25 million cows) produced an average of 7 kg
 14 milk per cow per day (NASS-USDA, 2007). In 2001, nine million cows produced an average of
 15 27 kg milk per cow per day. Assuming the cows in 1944 and 2001 were fed according to
 16 popular feeding recommendations of the time, the N intakes were 360 and 490 g/d per cow, and
 17 N excretion rates (N intake minus N in milk) were 326 and 364 g/d per cow. Multiplying by the
 18 number of cows in the US, shows that total milk production increased 40% from 52 billion kg to
 19 73 billion kg, while N excretion decreased 60% from 3.0 Tg N to 1.2 Tg N, respectively.

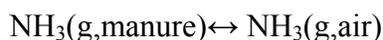
20 For Table 7, manure N was calculated for all US animal agriculture using data on animal
 21 production from the 2002 Census of Agriculture (USDA 2002). For data on livestock production
 22 (cattle, calves, poultry, hogs, and pigs), manure was calculated by the methods of Moffit and
 23 Lander (1999), following the exact methods they had used to compute manure from the 1997
 24 Census of Agriculture, but using the updated information from the 2002 Census of Agriculture.
 25 For data on production of manure from other animals (horses, goats, and sheep), the table uses
 26 coefficients for manure excretion as a function of average animal weights and animal inventory,
 27 taken from Battye et al. (1994).

Table 7: Manure production from animal husbandry in the continental US, Tg N per year 2002.

	<u>Tg N/yr</u>	<u>%</u>
Cattle & Calves	4.35	72
Poultry	0.94	16
Hogs & Pigs	0.53	9
Horses, Goats & Sheep	0.19	3
Continental US	6.02	100

2.2.4.5. Volatilization of animal waste

Ammonia volatilization is highly variable and is influenced by the amount of total ammoniacal nitrogen (TAN), temperature, wind speed, pH, chemical and microbiological activities, diffusive and convective transport in the manure, and gas phase resistance in the boundary layer above the source (Arogo et al., 2006). For example, greater TAN concentrations, wind speeds, temperatures, and pH levels increase NH₃ volatilization. Ammonia increases linearly with TAN concentration. Higher temperatures increase NH₃ volatilization rates due to decreased solubility in turn affecting NH₃/ NH₄⁺ equilibrium which follows Henry’s law for dilute systems:



Ammonia-ammonium equilibrium [NH₄⁺(l) ↔ NH₃(l) + H⁺] is affected by temperature influencing the dissociation constant K_a [K_a = (NH₃)(H₃O⁺)/(NH₄⁺)] and pH. Levels of pH greater than 7.0 allow NH₃ to undergo volatilization. Otherwise, NH₃ is in the form of NH₄⁺ and therefore cannot be volatilized (Arogo et al., 2006; James, 2008).

EPA estimates annual manure N excreted in livestock production in the US. for the “Inventory of US Greenhouse Gas Emissions and Sinks” (EPA, 2007). For the year 2002, these estimates (Appendix 3, Table A-174; EPA, 2007) indicate that a total of 6.8 Tg of N was excreted in livestock manure. Only a fraction of this N, ~1.24 Tg was recovered and applied directly as a nutrient source for crop production. Approximately 1.8 Tg N was lost from the manure management systems, most likely by ammonia volatilization. Other loss vectors include

1 leaching and runoff during treatment, and storage and transport before soil application. The
 2 remainder of the N was deposited in pastures and rangeland or in paddocks. This N is also
 3 susceptible to movement into the atmosphere and aquatic systems or incorporation into soil
 4 organic matter. By a combination of BMPs and engineered solutions it may be possible to reduce
 5 the emissions and discharge of odors, pathogens, and nitrogen compounds from agricultural
 6 operations (Aneja et al. 2008b,d).

7 Total manure reported in Table 7 in the contiguous US was estimated using USDA's method and
 8 yields an estimate of 6.0 Tg N/yr; while EPA's greenhouse gas inventory method in Table 8
 9 yields a total for the US of 6.8 Tg N/yr in 2002. The 'greenhouse gas' method suggests 13%
 10 higher manure N production. This difference highlights uncertainty in the calculations. The
 11 values in Table 8 include Alaska and Hawaii whereas the values in Table 7 do not; though given
 12 the small relative amount of livestock production in those states that doesn't contribute
 13 substantially to the difference.

14 **Table 8: Fate of Livestock Manure Nitrogen (Tg N) (EPA, 2007)**

Activity	1990	1992	1994	1996	1998	2000	2002	2004
Managed manure N applied to major crops	1.1	1.2	1.2	1.2	1.2	1.3	1.2	1.3
Manure N lost from management systems	1.5	1.6	1.6	1.6	1.7	1.7	1.8	1.7
Pasture, range, & paddock manure N	3.0	4.0	4.1	4.2	3.9	3.8	3.8	3.7
Total	6.6	6.7	6.9	7.0	6.9	6.8	6.8	6.7

15

16 **Finding 6**

17 Farm-level improvements in manure management can substantially reduce Nr load and losses.
 18 There are currently no incentives or regulations to decrease these losses and loads despite the
 19 existence of management options to mitigate.

20 **Recommendation 6:** *Policy, regulatory, and incentive framework is needed to improve manure*
 21 *management to reduce Nr load and ammonia losses, taking into account phosphorus load issues.*

1 2.2.5. Nr inputs to residential and recreational turf systems

2 Turf grasses cover 12.6-16.2 million ha across the continental US (Milesi et al. 2005). The area
3 under turf grass is roughly the size of the New England states and occupies an area up to three
4 times larger than that of *irrigated* corn (The Lawn Institute, 2007). The majority of this turf area
5 (approximately 75%) is in residential lawns. About 80% of all US households have private
6 lawns (Templeton et al. 1998) that average 0.08 ha in size (Vinlove and Torla, 1995). Another
7 approximately 15 % of total turf grass area is in low maintenance parks and approximately 10%
8 is in athletic fields and golf courses, which often receive higher levels of N application due to
9 hard use conditions.

10 Supplemental N fertilization is often necessary to maintain healthy and aesthetically pleasing turf
11 color, high shoot density and the ability to resist and recover from stress and damage. Nitrogen
12 also may be derived from atmospheric deposition or recycled decomposition of soil and grass
13 clipping organic matter. Whether these inputs are sufficient to maintain lawns of adequate
14 quality depends on many factors including age of the turf, uses, and expectations or goals of the
15 homeowner or field manager. Also, turf grasses are used to stabilize soil, often with an erosion
16 prevention matrix such as organic mats or with hydroseeding. Depending on circumstances,
17 these turf uses may be temporary until natural vegetation succeeds the turf, or may be low
18 maintenance turfs that are seldom fertilized such as highway medians and shoulders, grassy
19 swales and buffers.

20 Turf grass is maintained under a variety of conditions. Approximately 50% of all turf grass is
21 not fertilized, while the remainder is fertilized at varied intensities (Petrovic, personal
22 communication—June 5 2007). We have arrayed the different turf managements into three
23 groups according to the estimated amount of N-fertilizer applied annually (Table 9), residential
24 lawns maintained by homeowners (0.73 kg/100 m²), residential lawns cared for by professional
25 lawn care companies (2.92 (range, 1.95-7.3) kg/100 m²), and athletic fields and golf courses
26 (3.89 (range, 2.64-6.64) kg/100 m²). The estimate of total N-fertilizer used on turf grass in the
27 US is 1.1 Tg N/year, or 9% of the total average annual N-fertilizer used between 1999 and 2005.
28 Depending on land use patterns, certain areas of the country, particularly coastal areas where
29 residential and urban properties prevail, turf fertilizer can be an important or even dominant
30 source of nitrogen to surface waters.

31 Turf fertilizer N is susceptible to loss to the atmosphere, and surface and ground water when it is
32 not properly managed. Research on lawns has shown that leaching of NO₃⁻ can range between 0
33 and 50% of N applied (Petrovic, 1990). Nitrogen leaching losses can be greatly decreased by
34 irrigating lightly and frequently, using multiple and light applications of fertilizers, fertilizing at
35 the appropriate times, especially not too late in the growing season, and using soil tests to ensure
36 proper balance of non-N soil condition and pH. In a soil column experiment with turf coverage,
37 the percentage of N leached (as percentage of nitrogen applied) varied from 8 to 14% using light
38 irrigation and from 2 to 37% with heavy irrigation.

1 Applying fertilizer in appropriate amounts, avoiding periods when grass is dormant, and not
2 fertilizing too soon before irrigation or large rainfall events can all help ensure leaching and
3 runoff will be minimal without affecting turfgrass color and growth (Mangiafico and Guillard,
4 2006).

5 Nitrogen runoff losses are poorly quantified but a range similar to leaching is probable (Petrovic,
6 personnel communication). The chemical form of fertilizer N does not impact leaching/runoff
7 unless it is applied in late autumn (Petrovic, 2004), although use of slow release or organic
8 fertilizers can help reduce runoff and leaching. Shuman (2002) notes that runoff can be limited
9 by applying minimum amounts of irrigation following fertilizer application and avoiding
10 application before intense rain or when soil is wet. Volatile losses of Nr can be significant when
11 urea is applied. Measured denitrification losses are usually small, but depend upon timing of N
12 application relative to soil water status, irrigation and temperature. Typically 25% of N applied
13 is not accounted for in runoff, leaching, and uptake/removal, or soil sequestration (Petrovic,
14 personnel communication), which suggests that volatilization and denitrification are important
15 loss vectors. Nitrogen volatilization (Kenna, 2008, CAST Book) rates ranged from 0.9% under
16 light irrigation to 2.3% under heavy irrigation.

17 While under-fertilization can lead to reduced grass stand and weed encroachment which results
18 in more leaching and runoff N losses than from well managed lawns (Petrovic, 2004; Petrovic
19 and Larsson-Kovach, 1996), Guillard (2006) recommends not fertilizing lawns of acceptable
20 appearance. Further, prudent fertilization practices may include using one-third to one-half (or
21 less) of the recommended application rate, i.e., application rates below 0.5 kg/100m², and
22 monitoring response (Guillard, 2006). Less or no fertilizer may produce acceptable lawns,
23 especially once the lawn has matured, provided clippings are returned and mowing length is left
24 high.

25 As noted above, according to Petrovic (personal communication) half the lawns may not receive
26 any fertilizer. Those lawns are presumably satisfactory to their owners. Further N reductions can
27 be made if white clover is incorporated into turf and grasses such as fescues are selected for
28 amenable parts of the country, which require little or no N supplements once mature. These
29 practices can potentially reduce N fertilization (and subsequent leaching risk) on turf by one third
30 or more, saving 0.4 or more Tg N/year. When properly managed, turf grass provides a variety of
31 services that include decreasing runoff, sequestering carbon dioxide and providing a comfortable
32 environment in which to live (Beard and Green, 1994).

1

2 **Table 9: Estimate of fertilizer N used on turf grass in the US in the year 2000, based on a**
 3 **total area of 12.6 million ha.**

	Area (Million ha)	N rate kg/ha*	Total N Used Tg N
Type of turf fertilized	4.7	73.2	0.35
Nominal fertilization	0.93	296 (195-488)	0.27
Professional lawn care high maintenance areas (golf/sports)	1.26	390	0.49
Total	6.89	--	1.11

4

5 *10,000 m²/ha, used values of 0.73, 2.92 and 3.89 kg N/100 m² for nominal fertilization,
 6 professional lawn care, and high maintenance areas, respectively.

7 **2.3. Nr transfer and transformations in and between environmental systems**

8 This chapter discusses the transfers and flows of Nr within and between environmental systems
 9 (ES) which include atmosphere, terrestrial, and aquatic environments. The first section (2.3.1)
 10 contains information on Nr deposition from the atmosphere to terrestrial and aquatic systems,
 11 presents estimates of input and recycling of Nr within terrestrial systems, and discusses
 12 movement of Nr from the terrestrial to the aquatic system. The second section (2.3.2) presents
 13 an estimate of storage of Nr within the terrestrial system. The input and transfers of Nr within
 14 northeast US watersheds is discussed in Section 2.3.3. Within the nitrogen cascade there are a
 15 number of places where the flow of Nr is constrained or regulated. In the final section (2.3.4) a
 16 list of critical information needs is presented.

17 **2.3.1 Input and transfers of Nr in the US.**

18 This section contains discussions on inputs and transfers between and within environmental
 19 systems. First Nr deposition from the atmosphere to earth's surface is considered. Second is
 20 input and transfer of Nr within terrestrial systems, and finally the transfer of Nr into aquatic
 21 systems is discussed.

1 2.3.1.1 Nitrogen deposition from the atmosphere to the earth's surface

2 *Introduction.* The magnitude and mechanisms of Nr deposition to the Earth's surface remain
3 major unanswered environmental questions for the US, but atmospheric input contributes
4 substantially to the Nr content of terrestrial and aquatic ecosystems. "Along the eastern US coast
5 and eastern Gulf of Mexico, atmospheric deposition of N currently accounts for 10% to over
6 40% of new N loading to estuaries" [Paerl *et al.*, 2002]. Other watershed contribution estimates
7 range widely throughout the US, depending on size of the watershed related to the size of the
8 estuary, and the magnitude of contributing sources of atmospheric N enrichment. Valigura *et al.*
9 (2001) identified a median atmospheric nitrogen contribution of about 15% for 42 watershed
10 located throughout the US, although the maximum estimate was 60%.

11 NO_x, NH₃ and their reaction products not deposited onto the continent are generally lofted into
12 the free troposphere where they can have a wide range of influence and, in the case of NO_x,
13 because of nonlinearities in the photochemistry, generate substantial amounts of tropospheric
14 ozone (EPA, 2006). Total N deposition involves both gases and particles, and both dry and wet
15 (in precipitation) processes. Rates of deposition for a given species (in units of mass of N per
16 unit area per unit time) can be measured directly, inferred from mass balance of the atmospheric
17 budget, or modeled numerically, but substantial uncertainties remain with each of these
18 techniques when applied to deposition of any Nr species. A portion of the Nr deposited to the
19 earth's surface is re-emitted as NH₃, NO, or N₂O [Civerolo and Dickerson, 1998; Crutzen *et al.*,
20 2008; Galbally and Roy, 1978; IPCC, 2007; Kim *et al.*, 1994]. Although naturally-produced Nr
21 is involved, anthropogenic Nr dominates over most of the US. In this section we review the state
22 of the science concerning the total annual Nr deposition and trends in that deposition to the
23 contiguous 48 states.

24 Deposition involves both oxidized and reduced N species. Of the oxidized forms of atmospheric
25 N, all the members of the NO_y family (NO, NO₂, NO₃, N₂O₅, HONO, HNO₃, NO₃⁻, PAN and
26 other organo-nitrates, RONO₂) can be transferred from the troposphere to the surface, and some
27 undergo bidirectional flux, e.g., NO. Note that volatile amines are also detected as NO_y
28 compounds [Kashihira *et al.*, 1982; Wyers *et al.*, 1993]. Although a potent greenhouse gas, N₂O
29 is only emitted, not deposited and therefore will not be considered here. Of the reduced forms of
30 atmospheric nitrogen, NH₃ and NH₄⁺ play a major role. There is also evidence of deposition of
31 organic N such as amino acids and isoprene nitrates, and recent observations suggest that these
32 can account for as much as 10% (possibly 30%) of the US NO_x budget, especially in summer
33 [Duce *et al.*, 2008; Horowitz *et al.*, 2007; Keene *et al.*, 2002; Sommariva, 2008]. While this is a
34 worthy research topic, measurements are still limited and deposition of organic N compounds
35 will not be reviewed here. The wide array of relevant atmospheric compounds makes direct
36 measurement, and accurate load quantification challenging.

37 *Review of Nr wet deposition.* Substantial progress has been made in monitoring wet deposition,
38 as is summarized by the National Atmospheric Deposition Program/National Trends Network

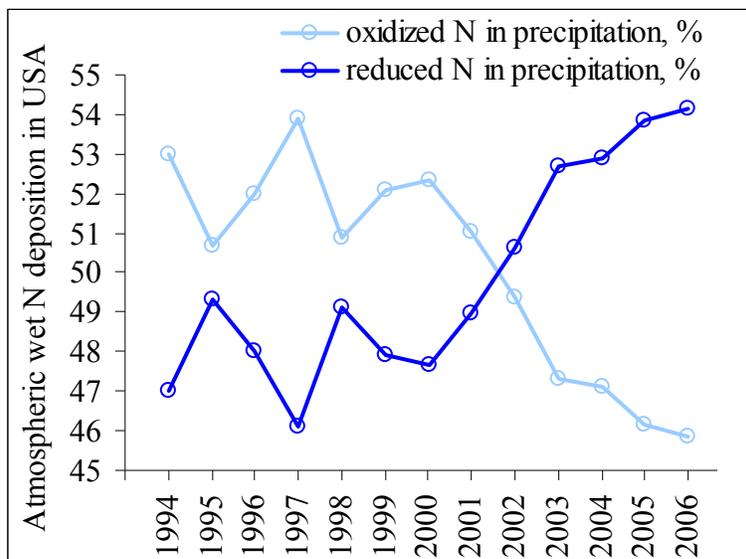
1 (NADP), established in 1979, which monitors precipitation composition at over 250 sites in the
 2 US and its territories (<http://nadp.sws.uiuc.edu>). Precipitation at each station is collected weekly
 3 according to well established and uniform procedures from which it is sent to the Central
 4 Analytical Laboratory for analysis of acidity, NO_3^- , NH_4^+ , chloride, as well as the base cations
 5 calcium, magnesium, potassium and sodium. For greater temporal resolution, the Atmospheric
 6 Integrated Research Monitoring Network AIRMON, comprised of seven sites, was formed in
 7 1992 as part of the NADP program to study wet deposition composition and trends using
 8 samples collected daily. The same species are measured as in NADP. By interpolating among
 9 sites, NADP is able to estimate the wet deposition of NH_4^+ (reduced N), and NO_3^- (oxidized N)
 10 for the 48 contiguous states (Table 10 and Figure 12).

11 **Table 10: Annual wet deposition of reduced (NH_4^+), oxidized (NO_3^-), and total N to the**
 12 **48 contiguous states, from the NADP/National Trends Network (NTN)**
 13 **<http://nadp.sws.uiuc.edu>**

NADP/NTN deposition estimates			
	reduced N in precipitation, kg/ha/yr	oxidized N in precipitation, kg/ha/yr	total wet N deposition, kg/ha/yr
1994	1.49	1.68	3.17
1995	1.63	1.67	3.30
1996	1.66	1.80	3.45
1997	1.49	1.74	3.24
1998	1.72	1.78	3.49
1999	1.46	1.58	3.04
2000	1.48	1.62	3.10
2001	1.50	1.57	3.07
2002	1.59	1.55	3.14
2003	1.72	1.55	3.27
2004	1.70	1.52	3.22
2005	1.65	1.41	3.06
2006	1.65	1.40	3.05

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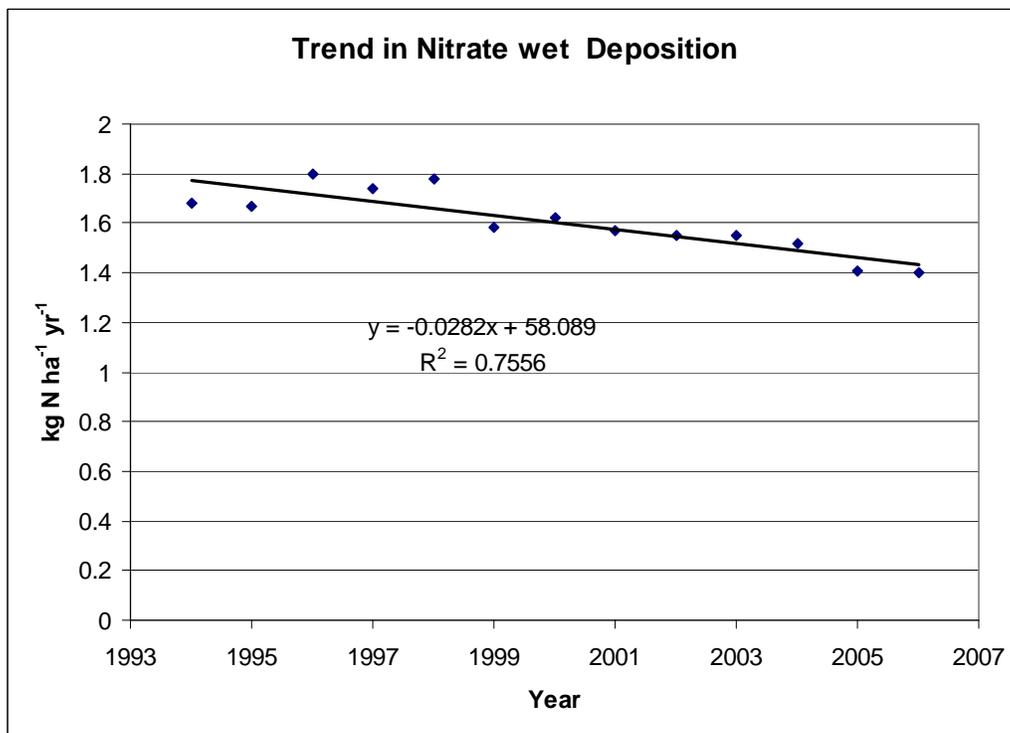
1 **Figure 12: Percent change in relative contribution of oxidized (NO_3^-) and reduced (NH_4^+)**
2 **nitrogen wet deposition from 1994 to 2006. As emissions of NO_x have decreased, the**
3 **relative importance of NH_x has increased.**



4
5
6 Although individual regions vary, the NADP data for the entire 48 states indicate an apparent
7 decrease in NO_3^- wet deposition, but not in NH_4^+ deposition (Table 10 and Figure 13). This
8 suggests that as NO_x controls have become more effective, the role of reduced N has grown in
9 relative importance. The nitrate data appear to show a strong trend (data from Table 10 plotted
10 in Figure 13) and quantifying the response of deposition to a change in emissions would be
11 useful to both the scientific and policy communities. A notable reduction in power plant NO_x
12 emissions occurred as the result of the NO_x State Implementation Plan (SIP) call [Gilliland *et al.*,
13 2008; McClenny *et al.*, 2002]. EPA should pursue a rigorous analysis of the emissions and
14 deposition data, including identifying monitors and methods that are consistent from the
15 beginning to the end of the record, as indicated in Recommendation D.

Figure 13: Trend in reported wet deposition of NO_3^- for the 48 contiguous states; data were taken from Table 10.

Note the sampling methods and locations have not been tested for temporal or spatial bias.



How is Nr deposition related to emissions? The relationship between emissions of Nr and observed deposition is critical for understanding the efficacy of abatement strategies as well as for partitioning local and large-scale effects of emissions. Only a few studies covering several individual sites have sufficient monitoring consistency and duration to determine rigorously long-term trends in NO_3^- and NH_4^+ and their relationship to emissions, and here we consider several examples [Butler et al., 2005; Kelly et al., 2002; Likens et al., 2005]. These sites tend to be in the eastern US where monitoring is more concentrated and has a longer history and where upwind sources and downwind receptors are relatively well known. Examination of these studies reveals that concentrations of gaseous and particulate N species in the atmosphere, as well as the Nr content of precipitation over the eastern US shows significant decreases. Correlation with regional emissions is stronger than with local emissions, in keeping with the secondary nature of the major compounds – NO_3^- and NH_4^+ . Decreases in NH_4^+ concentration and wet deposition are attributed to decreases in SO_4^{2-} concentrations meaning that more of the reduced Nr remains in the gas phase. For the period 1965 to 2000, NO_3^- levels in bulk deposition correlate well with reported NO_x emissions. For shorter and earlier time periods the correlation is weaker, and the authors attribute this to changes in the EPA’s methods of measuring and reporting emissions; they find evidence of continued errors in emissions from vehicles. Decreases in deposition will probably not be linearly proportional to decreases in emissions; for

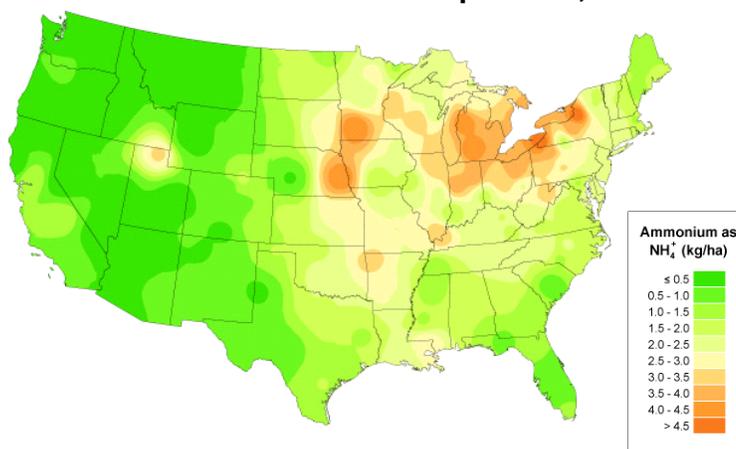
1 example a 50% reduction in NO_x emissions is likely to produce a reduction of about 35% in
2 concentration and deposition of nitrate.

3 The relationship between reduced N emissions and deposition is more complex. When looked at
4 over the full extent of the record, from 1985 to 2005, the increase in NH₄⁺ wet deposition
5 becomes apparent (Figure 14), especially in selected areas of the country
6 <http://nadp.sws.uiuc.edu/amaps2/>. The southeastern US, particularly North Carolina, has seen a
7 long-term increase [Aneja *et al.*, 2000; Aneja *et al.*, 2003; Stephen and Aneja, 2008]. The
8 increase in deposition coincides with the increase in livestock production, but a swine population
9 moratorium appears to have helped abate emissions [Stephen and Aneja, 2008]. Concentrations
10 of aerosol NH₄⁺ have decreased in many parts of the country, and this may appear to contradict
11 the trend in wet deposition, but a decrease in condensed phase NH₄⁺ will be accompanied by an
12 increase in vapor phase NH₃ if SO₄²⁻ and NO₃⁻ concentrations decrease; see
13 <http://vista.cira.colostate.edu/improve/>. This potentially misleading information highlights the
14 need for measurements of speciated NH_x [Sutton *et al.*, 2003].

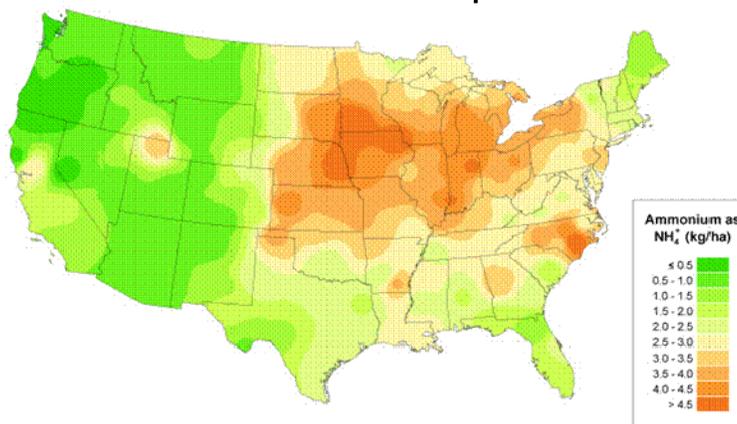
15 **Figure 14: Total annual NH₄⁺ deposition for the years 1985 and 2005 showing increases in**
16 **the Midwest and Southeast, especially North Carolina commensurate with increases in**
17 **livestock production. <http://nadp.sws.uiuc.edu/amaps2/>**

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Ammonium Ion Wet Deposition, 1985



Ammonium Ion Wet Deposition 2005



1

2

3 *Review of dry deposition observations for the eastern US.* Monitoring dry deposition presents a
4 greater challenge. The Clean Air Standards and Trends Network (CASTNET) and Atmospheric
5 and Integrated Research Monitoring Network (AIRMON) were established to monitor chemical
6 and meteorological variables to infer dry deposition in order to study the processes leading from
7 emissions to atmospheric concentrations and through deposition to ecosystem effects. AIRMON
8 dry deposition monitoring was discontinued in 2003. See <http://www.epa.gov/castnet/>,
9 <http://www.arl.noaa.gov/reserach/programs/airmon.html>, and <http://nadp.sws.uiuc.edu>.

10 Recent reviews [*Sickles and Shadwick, 2007a; Sickles and Shadwick, 2007b*] analyzes the
11 seasonal and regional behavior of concentration and deposition of a variety of primary and
12 secondary pollutants including reactive N and investigated trends from 1990 to 2004 for the US
13 east of the Mississippi River. The investigators evaluated observations from more than 50 sites
14 in the eastern States and concluded that for 2000-2004, the mean annual total measured N
15 deposition for this area was 7.75 kg N per hectare per year (expressed as kg N/ha/yr); see Table
16 11. This value includes vapor phase HNO_3 , particulate NO_3^- , and NH_4^+ ; it does not include
17 deposition of other oxidized species such as NO_x and PAN, nor gas-phase reduced N species
18 most notably NH_3 . The measured deposition rates peak in spring and summer, but unaccounted
19 for ammonia deposition is probably a substantial fraction of the total, and the true annual cycle
20 remains uncertain.

1

Table 11: Deposition of N to the eastern US in units of kg N/ha/yr

	Annual deposition kg N/ha/yr
Dry NH₄⁺	0.41
Wet NH₄⁺	2.54
Dry HNO₃ + NO₃⁻	1.88
Wet NO₃⁻	2.92
Total measured N Dep.	7.75
Est. dry other NO_y	0.94
Est. dry NH₃	1.90
Est. total NO_y	5.74
Est. total NH₃ + NH₄⁺	4.85
Est. Grand Total	10.59

2

3 Data are from the US CASTNET program for the period of 2000-2004. Monitored
4 species for 34 sites east of the Mississippi include vapor-phase HNO₃, particulate NO₃⁻,
5 and NH₄⁺; unmonitored are other oxidized species such as NO_x and PAN and gas-phase
6 reduced N species most notably NH₃ [Sickles and Shadwick, 2007a]. For an explanation
7 of how deposition of unmeasured species was estimated see text.

8 *Estimated total N deposition to the eastern US.* CASTNET monitors HNO₃ and NO₃⁻, but not
9 other members of the NO_y family – notably NO_x. Dennis ([EPA](#), 2007) estimated that the
10 unmeasured NO_y species account for about 50% of the dry deposition of nitrates. Half of 1.88
11 (see Table 11) is 0.94 kg N /ha/yr. Ammonia is also unmeasured by CASTNET, and model
12 estimates [Mathur and Dennis, 2003] of NH₃ indicate that dry deposition should account for
13 75% of wet NH₄⁺ deposition; 75% of 2.54 is 1.9 kg N /ha/yr. Adding these two values to the
14 total from Table 11 yields a reasonable estimate, within about ±50% absolute accuracy, of total
15 deposition of about 10.6 kg N /ha/yr for the eastern US.

1 *Characteristics of N deposition to the eastern US.* Highest N deposition occurs in the spring and
2 summer, when chemical thermodynamics and photochemistry are conducive to removal from the
3 atmosphere. As temperatures warm, HNO₃ formation accelerates and fertilizer application to
4 agricultural fields steps up. Dry deposition for gases is faster than for particles; for example the
5 mean CASTNET reported HNO₃ deposition velocity is 1.24 centimeters per second (cm s⁻¹) while
6 that for particulate NO₃⁻ is 0.10 cm/s. Conversion of condensed ammonium nitrate to gaseous
7 NH₄⁺ and HNO₃ is favored at high temperatures. Oxidation of NO_x to HNO₃ is faster in the
8 spring and summer due to greater ozone and hydroxyl radical (OH) concentrations than in the
9 winter. Warm temperatures favor release of NH₃ from soils, and summer months are the season
10 of fastest conversion of SO₂ into H₂SO₄; NH₃ combines rapidly with SO₄²⁻ to form ammonium
11 sulfate or bisulfate that are then washed out of the atmosphere.

12 Wet deposition of NH₄⁺ and NO₃⁻ dominates deposition, averaging for the sum of NH₄⁺ and
13 NO₃⁻ 5.46 kg N /ha/yr, or 70 % of the total, but dry deposition cannot be neglected; it averaged
14 2.29 kg N /ha/yr or 30 % of the measured total. Because foliar resistance to NO is weak, dry
15 deposition of NO₃⁻ accounts for 39 % of the total NO₃⁻ deposition. When we add estimated
16 NO_x and NH₃ dry deposition (Table 11), the sum of 0.41, 1.88, 0.94, and 1.90 is 5.13 kg N /ha/yr
17 and rivals that delivered in precipitation.

18 The regional gradient is relatively modest, with the least annual average N deposition occurring
19 in the Southeast (6.77 kg N /ha/yr) and the greatest in the Midwest (8.74 kg N /ha/yr). These
20 gradients are driven primarily by differences in abundance – the annual mean concentration of
21 total measured atmospheric N was 1.68 µg/m³ in the Southeast and 2.40 µg/m³ in the Midwest.
22 Because only the secondary products of primary pollutants were measured, such relatively
23 uniform concentrations are typical. Also contributing to the relative spatial uniformity of
24 deposition is the greater rate of precipitation in the southeast. The policy-relevant implication of
25 the large spatial scale nature of N deposition is that large-scale control measures are called for.

26 Trends in measured and inferred deposition over the 15-year monitoring period (Figure 13)
27 reflect trends in emissions. In 2003 and 2004 substantial reductions in emissions from electric
28 generating units (power plants) were implemented under the NO_x State Implementation Plan
29 (SIP) call. Many of these power plants are located along the Ohio River generally upwind of the
30 measurement area. The observed trend between 1990 and 1999 was weak, but significant
31 reductions (p = 0.05) were found between the 1990-1994 and 2000-2004 periods [*Sickles and*
32 *Shadwick, 2007a*]. The concentration of nitric acid fell from 1.99 to 1.74 µg N/m³ or by 13%,
33 and total nitrate deposition fell by 0.56 kg N/ha/yr or 11%. NO_x emissions controls are
34 implemented primarily in the ozone season (May to September) and greatest reductions in N
35 deposition were observed in the summer. For NH₄⁺, the average concentration fell from 1.83 to
36 1.61 µg N/m³ probably as a result of lower sulfur emissions. No change was observed in wet
37 NH₄⁺ deposition.

1 Sickles and Shadwick [2007b] attributed the reduction in NO_3^- deposition to reductions in NO_x
2 emissions. They also reported that the relationship between emissions and deposition was less
3 than 1:1. In other words, emissions were reduced by about 22%, but deposition fell by only
4 about 11%. This nonlinearity may be a function of the time intervals chosen. The second five-
5 year period averages from 2000-2004, but reductions went into effect over the 24-month period
6 2003-2004. Deposition depends on both chemistry and climate, and weather shows substantial
7 interannual variability.

8 *Uncertainty in measured deposition.* Analysis of uncertainties in the deposition of Nr is
9 challenging. The coefficient of variation for total, regional N deposition for 2000-2004 is 23%,
10 representing a minimal value of uncertainty. Concentrations of some of the NO_y species are
11 monitored, as is the wet deposition of major oxidized and reduced N species, but concentrations
12 of ammonia and other Nr species are not monitored. The network for monitoring dry deposition
13 is spatially sparse. The monitors are located in flat areas with uniform surfaces – advective
14 deposition into for example the edges of forests are estimated to contribute substantially to the
15 uncertainty [Hicks, 2006]. Other sources of error include the model used to convert weekly
16 average concentrations and micrometeorological measurements into depositions. Precision can
17 be determined from collocated sites and is estimated at 5% for nitrate and 15% for ammonium in
18 precipitation [Nilles *et al.*, 1994]. The uncertainty in estimated dry deposition arises primarily
19 from uncertainty in deposition velocities [Brook *et al.*, 1997; Hicks *et al.*, 1991] and can be as
20 high as 40% for HNO_3 . Total uncertainty for deposition of Nr based on measurements is at least
21 25% and may be as high as 50%.

22

1 *Deposition estimates from numerical models.* The EPA Community Multiscale Air Quality
2 model (CMAQ) was run for North America at 36 km resolution (R. Dennis et al., personal
3 communication January 2008). Calculated nitrogen deposition for the 48 contiguous states
4 (Table 12) was broadly consistent with direct measurements (Table 11). This run of CMAQ did
5 not account for NO_x emissions from marine vessels, and these accounted for about 4% of the
6 total NO_x emissions in 2000. CMAQ NO_x emissions were 5.84 Tg N for the year 2002; of that
7 2.74 Tg N were deposited. This suggests that ~50% was exported – a number somewhat higher
8 than has been reported in the literature; this discrepancy is discussed below.

9 **Table 12: Results from CMAQ for total deposition in 2002 to the 48 contiguous states of**
10 **oxidized and reduced N.**

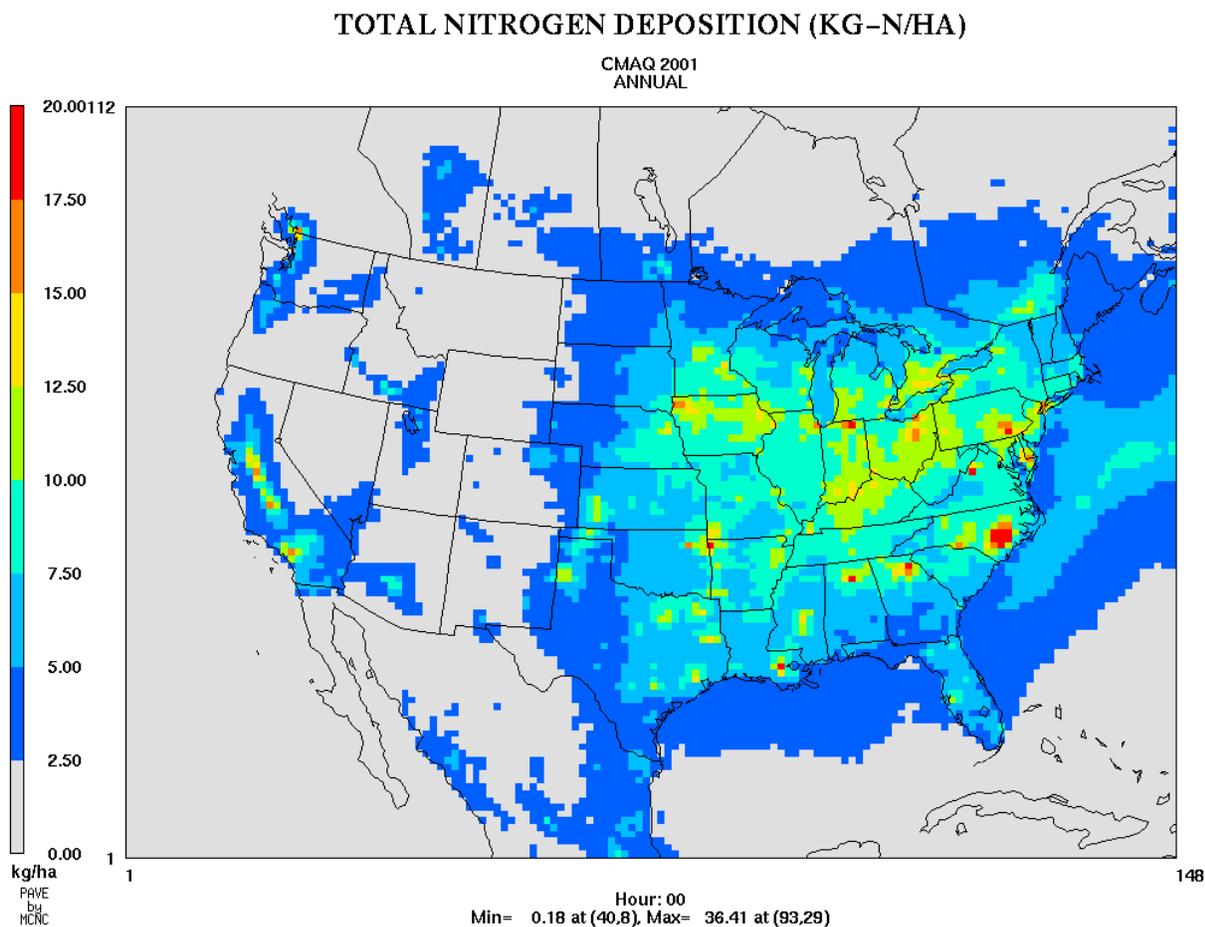
	kg N/ha/yr	Tg N/yr
Oxidized N	3.51	2.74
Reduced N	2.66	2.07
Total N Depos.	6.17	4.81

11

12 Ammonia emissions and ambient concentrations can be measured, but are not routinely
13 monitored. For Nr, the CMAQ numerical simulation employed inverse modeling techniques –
14 that is NH₃ emissions were derived from observed NH₄⁺ wet deposition [Gilliland et al., 2006;
15 Gilliland et al., 2003; Mathur and Dennis, 2003]. Model determinations therefore do not
16 provide an independent source of information on NH₄⁺ deposition.

17 The three-year CMAQ run gives an indication of the spatial pattern of deposition and the relative
18 importance of wet and dry deposition (Figures 15 and 16). For NH_x, wet and dry are equally
19 important, but for NO_y, dry deposition is greater than wet. While this is not true for the eastern
20 US it is true for the US as a whole; in arid southern California, for example, dry deposition of Nr
21 dominates. Based on CMAQ, total NO_y deposition is 2.79 times the wet deposition and total
22 NH_x deposition is 1.98 times the wet deposition. Using the data from Table 12 for the average
23 wet deposition for the period 2000- 2004, total deposition of oxidized N is 4.36 kg N /ha/yr (2.79
24 * 1.56 = 4.36). The total deposition for reduced N is 3.17 kg N /ha /yr (1.98 * 1.60). The grand
25 total (wet and dry oxidized and reduced) is then about 7.5 kg N /ha /yr¹.

1 **Figure 15: CMAQ annual average (wet plus dry and oxidized plus reduced) nitrogen**
2 **deposition (in kg-N /ha/yr) across the US based on 3 years of differing meteorology - one**
3 **dry, one wet, and one average precipitation year - across the Eastern US (Source: US EPA,**
4 **2007).**



5

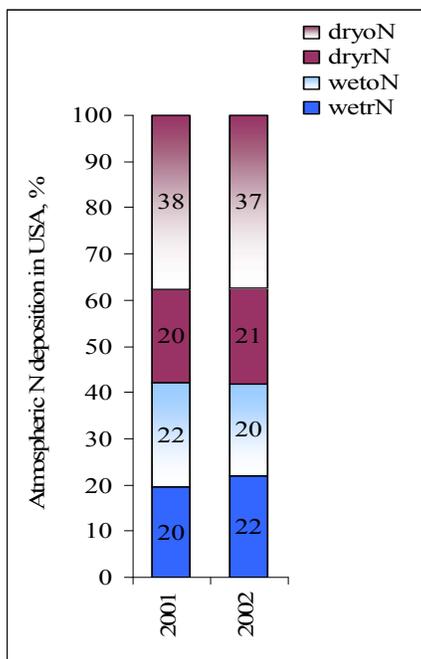
6 The model has highly simplified organic N deposition. Note these values reflect emissions
7 before the NO_x SIP-call which resulted in substantial reductions in NO_x emissions from point
8 sources over the eastern US.

1

2

Figure 16: Relative contributions of wet and dry deposition for reduced and oxidized N. Results from CMAQ runs for the 48 contiguous States.

3



4

5 For comparison purposes, a collection of Chemical Transport Models (CTM's) [Dentener *et al.*, 2006]
6 yielded total (wet plus dry) deposition to the whole US of about 3.9 Tg N /yr oxidized Nr and 3.0 Tg N
7 /yr ammoniacal N for current emissions. The fate of NO_x is assumed to be primarily HNO₃ or aerosol
8 NO₃ ; organic N species are generally not modeled in detail. Because this analysis includes Alaska, a
9 better estimate for NO_x for the 48 contiguous states is 4.6 Tg N /yr. The variance among models was
10 about 30% (one σ) for deposition fluxes in regions dominated by anthropogenic emissions. Globally,
11 the calculations from the ensemble of 23 CTM's estimated 36-51% of all NO_y, and NH_x, deposited over
12 the ocean. This load could be important to estuarine N loading estimates as offshore N is carried inshore
13 by currents or through advective processes.

14 *Deposition estimates from mass balance.* If the total emissions of Nr compounds are known, and if the
15 deposition is rapid, then a reasonable estimate of rate of deposition can be obtained by mass balance –
16 deposition equals emissions minus export. Although substantial uncertainty (about a factor of two)
17 exists for the emissions of NH₃, NO_x release is reasonably well known. In general, advection in the
18 boundary layer and lofting through convection followed by export at higher altitudes are the two main
19 mechanisms that prevent removal of NO_y and NH_x by deposition to the surface of North America [Li *et*
20 *al.*, 2004; Luke *et al.*, 1992].

21 As early as the 1985, experiments were devised to measure the transport of N pollutants offshore of
22 North America [Galloway *et al.*, 1988; Galloway and Whelpdale, 1987; Galloway *et al.*, 1984; Luke and
23 Dickerson, 1987]. Galloway *et al.* (1984) estimated, based on the limited data available at the time, an

1 annual average eastward NO_y flux of 3.2 Tg N /yr between the surface and 5000 m altitude. For the
2 early 1980's this represents about 40% of the NO_x emitted, but more recent estimates have yielded a
3 lower value. Dickerson et al. (1995) estimated that about 0.4 Tg N was advected at altitudes below 3000
4 m off the North American East Coast in winter; this represents about 6.5% of the total N emissions at
5 the time. More recent estimates, again using data from lower to mid tropospheric altitudes over the
6 eastern US [Li et al., 2004; Parrish et al., 2004b], estimated that 10 - 15% of the emitted NO_x was
7 exported in the spring and fall. A summer season determination [Hudman et al., 2007] indicated about
8 15% NO_x export in the 2.5–6.5 km altitude range.

9 None of these studies, based on observations or combinations of observations and models, evaluated N
10 flux resulting from deep convection, which can account for substantial transport of boundary layer (BL)
11 air in the summer [Chatfield and Crutzen, 1984; Luke et al., 1992; Ryan et al., 1992]. Uncertainty in the
12 convective mass flux and in NO produced by lightning make direct determination of NO_y vented from
13 the BL difficult. The convective mass flux is at present a poorly constrained quantity, uncertain to about
14 a factor of two [Doherty et al., 2005; Lawrence et al., 2003].

15 In an early, model-based mass balance study [Kasibhatla et al., 1993], wet and dry deposition in source
16 regions were estimated to account for 30% and 40-45% of the emissions, respectively. The authors
17 reported that the remainder (25-30%) was exported off the continent, and more recent modeling studies
18 tend to agree with a determination of 65-75% deposition [Doney et al., 2007; Galloway et al., 2004;
19 Holland et al., 1997; Horowitz et al., 1998; Liang et al., 1998]. In general, these CTM's derived small
20 export values – on the order of 30% of the total NO_x emitted into the lower atmosphere. For example,
21 Park et al. (2004) used a stretched-grid global model with highest resolution over the US to estimate
22 NO_x and NO_y export for June 1985. They reported boundary layer NO_y advection of 0.56 Tg N /yr and
23 total exports of 1.94 Tg N /y; deposition accounted for approximately 76% of the emitted NO_x. There is
24 substantial model-to-model variability within one model [Penner et al., 1991] putting more nitrate
25 deposition into the Gulf of Mexico. The models appear to match well the measured boundary layer
26 export and the ratio of NO_x/NO_y, e.g., [Luke et al., 1992; Parrish et al., 2004a] and generally agree with
27 direct measurements. In summary, reviewed publications using the mass balance approach have
28 substantial uncertainty but indicate with some consistency that 25-35% of the NO_y emitted over the US
29 is exported.

30 *Comparison of models and measurements of oxidized N deposition.* Both ambient measurements and
31 numerical models of NO_y have reached a level development to allow reasonable estimates of deposition.
32 For reduced nitrogen, neither ambient concentrations nor emissions are known well enough to constrain
33 models. Here we will review published research on NO_y export and deposition. Recent model estimates
34 of the US N budget are reasonably uniform in finding that about 25-35% of total NO_x emissions are
35 exported. From those studies we can estimate the vertical flux into the surface of the 48 contiguous
36 states. For the 2000-2002 period, total NO_x emissions were about 4.5 Tg N /yr. The upper limit to
37 deposition, if all of this is deposited onto the continent, would have been 5.7 kg N /ha /yr for the 7.8 x
38 10⁶ km² (7.8 x 10⁸ ha) surface area of the 48 contiguous States. The studies reviewed above suggest that
39 70% of the N released is deposited, and this works out to ~4.0 kg N /ha /yr. This is comparable to the

1 oxidized N deposition of 5.7 kg N /ha /yr estimated from CASTNET observations for the eastern States
2 (Table 10).

3 Results from CMAQ runs, described above, indicate that of the NO_x emitted over the continental US,
4 50% is deposited and 50% is exported. This is within the combined error bars of other studies, but well
5 under the best estimate of 70% deposition. One possible source of this discrepancy is organo-nitrogen
6 compounds. The mechanism for formation and deposition of organic nitrates is uncertain, and the
7 chemical mechanism used in CMAQ was highly simplified – only about 2-3% of the total Nr deposition
8 can be attributed to organo-nitrogen compounds (R. Dennis personal communication, 2008). Duce et al
9 (2008) suggest that organic Nr constitutes a fair fraction of the Nr load. Many of these compounds
10 (such as peroxy-methacrylic nitric anhydride, CH₂C(CH₃)C(O)OONO₂) are formed by reactions
11 between VOC's and NO_x. Such compounds are detected as NO_y and are thus included in measurements
12 of Nr export. Arbitrarily up-scaling of CMAQ deposition would then violate mass balance. EPA should
13 investigate the source of this discrepancy and support research to reduce the uncertainty in Nr deposition
14 and export.

15 The total wet deposition of nitrate to the 48 contiguous states averaged 1.6 kg N /ha /yr for the period
16 2000-2002 (Table 11). If we assume an equal amount is lost from the atmosphere through dry
17 deposition, then the total deposition of oxidized N to the surface is 3.2 kg N /ha /yr, close to the implied
18 model results of ~4.0 kg N /ha /yr. The estimate of equal fractions wet and dry deposition carries
19 substantial uncertainty – NADP maps show, for example, little wet deposition of nitrate in southern
20 California, but this region is known to experience high concentrations of NO_y. Neither approach to
21 determining deposition is certain to be better than about ± 50%, so additional work is called for.

22 Major sources of uncertainty in modeled and observed values include missing deposition terms and
23 poorly constrained convective mass flux. As indicated above, convective mass flux (rapid vertical
24 transport) is uncertain because most convective clouds are smaller than a grid box in a global model.
25 There is evidence for nonlinearities in NO₂ deposition velocities with greater transfer from the
26 atmosphere to the surface at higher concentrations [Hori et al., 2004; , 2006].

27 *Conclusions on atmospheric deposition of Nr.* Downward transport from the atmosphere is a major
28 source of Nr to the Earth's surface, but there are uncertainties in the characteristics and absolute
29 magnitude of the flux. Pollutants not deposited are exported from the continent and alter the
30 composition and radiative balance of the atmosphere on a large scale. A review of the literature
31 revealed the following major points concerning the present state of the science:

- 32 1. Measurements from the National Atmospheric Deposition Program (NADP) indicate that
33 wet deposition of ammonium plus nitrate for the period 2000 – 2006 averaged 3.1 kg N
34 /ha /yr over the 48 contiguous States.
- 35 2. The reduced (NH₄⁺) and oxidized (NO₃⁻) forms of reactive N contributed about equally to
36 the flux, but input to the eastern US was greater (and less uncertain) than to the western
37 US.
- 38 3. For the US east of the Mississippi River, dry deposition data have also been analyzed –
39 the Clean Air Standards and Trends Network (CASTNET) monitors vapor phase HNO₃,

1 as well as particulate NO_3^- and NH_4^+ . These measurements indicate 7.75 kg N /ha /yr
2 total deposition (5.46 wet 2.29 dry) over the East. Conspicuous by its absence from this
3 number is dry deposition of ammonia.

- 4 4. Decreases in NO_x emissions appear to lead to decreases in deposition. NADP data show
5 a national decreasing trend in the wet nitrate deposition and some individual sites show
6 statistically significant decreases in deposition and correlations with emissions.
- 7 5. A thorough review of all published studies of the US NO_y budget indicates that about 70
8 % of the NO_x emitted by the US is deposited onto the continent with the remainder
9 exported, although substantial uncertainty remains. Major sources of error include dry
10 deposition of unmonitored members of the NO_y family, uncertainties in the chemistry of
11 organic N, and poorly constrained estimates of convective venting of the planetary
12 boundary layer.
- 13 6. Based on observations and model estimates of the relative deposition of unmeasured
14 quantities, total estimated deposition of all forms of Nr for the period 2000-2004 is ~11
15 kg N /ha /yr for the eastern US, and for the 48 States ~7.5 kg N /ha /yr with a range of 5.5
16 to 9.5 kg N /ha /yr.

17 **Finding 7**

18
19 Scientific uncertainty about the origins, transport, chemistry, sinks, and export of Nr remains high, but
20 evidence is strong that atmospheric deposition of Nr to the Earth's surface as well as emissions from the
21 surface to the atmosphere contribute substantially to environmental and health problems. *The current*
22 *NO_2 standard is inadequate to protect health and welfare, and compliance monitoring for NO_2 is*
23 *inadequate for scientific understanding.* Atmospheric emissions and concentrations of Nr from
24 agricultural practices (primarily in the form of NH_3) have not been well monitored, but NH_4^+ ion
25 concentration and wet deposition (as determined by NADP and NTN) appear to be increasing. This
26 suggests that NH_4^+ emissions are increasing. Both wet and dry deposition contribute substantially to
27 NH_x removal, but only wet deposition is known with much scientific certainty. Thus consideration
28 should be given to adding these chemically reduced and organic forms of Nr to the list of Criteria
29 Pollutants.

30 **Recommendation 7a.** *Increase the scope and spatial coverage of the Nr concentration and flux*
31 *monitoring networks (such as the National Atmospheric Deposition Program and the Clean Air Status*
32 *and Trends Network) and appoint an oversight review panel for these two networks.*

33 **Recommendation 7b.** *Monitor NH_3 , NH_x , NO_y , NO_2 , NO , and PAN concentrations, measure or infer*
34 *deposition, and support the development of new measurement and monitoring methods.*

35 **Recommendation 7c.** *Measure deposition directly both at the CASTNET sites and nearby locations*
36 *with non-uniform surfaces such as forest edges.*

37 **Recommendation 7d.** *EPA should continue and support research into convective venting of the*
38 *Planetary Boundary Layer and long range transport.*

39 **Recommendation 7e.** *Develop and support analytical techniques and observations of atmospheric*
40 *organic N compounds in vapor, particulate, and aqueous phases.*

1 **Recommendation 7f.** *Increase the quality and spatial coverage of measurements of the NH₃ flux to the*
2 *atmosphere from major sources especially agricultural practices.*

3 **Recommendation 7g.** *Improve numerical models of NO_y and NH_x especially with regard to chemical*
4 *transformations, surface deposition, and off shore export; develop linked ocean-land-atmosphere*
5 *models of Nr.*

6 *2.3.1.2 Input and recycling of Nr within terrestrial systems in the US*

7 This section builds upon Section 2.2 by integrating the information in that section on Nr introduction
8 into the US and its loss to environmental systems by energy and food production into the overall picture
9 of Nr cycling within terrestrial systems.

10 Annual input of newly created Nr onto terrestrial ecosystems comes from atmospheric deposition,
11 synthetic fertilizer and BNF in managed and unmanaged ecosystems (Table 1.). Although Nr from
12 atmospheric deposition is formed inadvertently during fossil fuel combustion and from volatilization of
13 NH₃ from agricultural activities it serves to provide nutrients, along with biological N fixation and
14 synthetic fertilizer, for food, feed and fiber production in the agricultural sector. Forests and grasslands
15 use Nr for growth and home gardens, parks and recreational areas utilize Nr within the urban landscape.
16 Approximately 32 Tg of new Nr reached the land of the 48 contiguous states in 2002 (Table 1). An
17 additional ~0.2 Tg of N was imported mainly as food and drink products (FAO, 2008). An additional
18 ~12 Tg of Nr was recycled back to terrestrial and aquatic systems in livestock (~6 Tg N) excreta, human
19 (~2 Tg N) excreta, and crop residue from the previous year's production (~4 Tg N; USEPA, 2007). Of
20 this N ~ 1.3 Tg (~1.2 from livestock manure and <0.1 from sewage sludge) was used as fertilizer for
21 crop production (USEPA, 2007).

22 Most of the new Nr (~17 Tg total with 9 Tg from synthetic fertilizer and ~8 Tg from biological N
23 fixation; Table 13) was used to produce food for human consumption and forage and feed for livestock
24 and poultry. In addition to new Nr and Nr that was recycled from livestock and human excreta, crop
25 production releases Nr that is stored in soil organic matter (see section 3.3.2). The N in cereal crops is
26 typically derived from added fertilizer (synthetic or manures) and from mineralization of soil organic
27 matter (conversion of complex organic molecules to ammonium) in about equal amounts. As discussed
28 in Sections 2.2 and 2.3.5.1, crop production is not efficient in using Nr so only 30-70% (a global average
29 of 40%) of all of the N mobilized for crop production is harvested in the crop. The remainder is stored
30 in the soil, leached to aquatic systems as NO₃⁻, volatilized to the atmosphere as NH₃ or NO_x or
31 denitrified (see Section. 2.4) to produce NO_x, N₂O and N₂. An additional ~1.1 Tg of synthetic fertilizer
32 N is used to maintain turfgrass in the urban environment (see Section 2.2.4) and another 0.1-0.2 Tg N is
33 used to enhance forest production.

1 **Table 13: Sources of reactive N input into terrestrial systems in the US in 2002 (from Table 1; in**
 2 **Tg N).**

Source	Environmental System				
	Agricultural	Vegetated		Populated	Total
		Forest	Grassland		
Atmospheric	1.3	1.4	1.9	0.4	6.9*
N fixation	7.7	--	6.4	--	14.1
Synthetic N	9.7	0.1	**	1.1	10.9
Animal manure	1.2	--	3.8#	--	6.0#
Human sewage	0.1	--	--	1.2	1.3
Total Nr input	20.0	1.5	12.1	2.7	39.2

3 *The amount of atmospheric Nr deposition is based on area of each environmental system within the
 4 continental US. The total area does not sum to 100% because non arable lands are not included in this
 5 table.

6 **Synthetic fertilizer N used for managed pasture fertilization is included in the agricultural land
 7 classification.

8 #Unrecoverable livestock manure deposited on grasslands, the remaining N is assumed to be lost through
 9 ammonia volatilization, leaching or denitrification (EPA, 2007).

10 Within the nitrogen cascade (Figure 3), the interactions between the agricultural and populated portions
 11 of the terrestrial system dictate the production and flow of Nr. Although occupying the largest area,
 12 forest and grassland portions of terrestrial ecosystems serve mainly to absorb atmospheric deposition
 13 and provide a source of forest products and forage for livestock production. Reactive nitrogen input into
 14 these systems is from biological N fixation in unmanaged lands, atmospheric deposition and Nr from
 15 livestock manure that is deposited, while the livestock is grazing within grasslands (Table 13) may lead
 16 to the N saturation of unmanaged forest and grassland ecosystems (Galloway et al. 2004; Bobbink et al.,
 17 2009).

18 This report uses the Nr input numbers from Table 13 and food production numbers to estimate the flow
 19 of Nr through agricultural and populated parts of the terrestrial system (Table 14). The FAO (2008;
 20 www.fao.org/statistics/toptrade/trade.asp) lists the 20 largest agricultural commodities produced,
 21 imported and exported in the US in 2002. Of these commodities, corn (229 Tg), soybeans (75 Tg),
 22 wheat (44 Tg) and cow's milk (77 Tg) were produced in the greatest amount. Using commodity N

1 content data (derived from data used to calculate crop residue N in the EPA (2007g) inventory of US
2 greenhouse gas emissions and sinks, an estimated 9 Tg of N was marketed in three crops, soybeans (4.4
3 Tg N; from EPA, 2007g), corn (3.2 Tg N), and wheat (0.9 Tg N). Whole milk contained ~ 0.5 Tg of N
4 while other meat and egg produce contained ~1.4 Tg of N, totaling ~ 1.9 Tg N. Grain, fruits, nuts and
5 vegetables contained ~9.3 Tg of N. If the total N input use efficiency is 40% then ~23 Tg of N from all
6 sources is required to produce 9.3 Tg of vegetative commodities. Table 14 lists the estimated Nr input
7 into agricultural systems (~ 20 Tg) and additional N input from crop residue that was returned to the
8 field the previous year (4.4 Tg) and from mineralization of soil organic matter (4.7 Tg). All of this N
9 input totals ~29 Tg of N that is actually involved in the production of the 9.3 Tg of crop commodity N.
10 If one assumes that return of crop residue to the field is directly proportional to crop production, then
11 24.3 Tg of N was required to produce the 9.3 Tg of crop commodity N. These estimates indicate that
12 ~38% of the total annual input of N that went into the agricultural crop production system was contained
13 in the main crop commodities produced in the US in 2002.

14 Of this 24.3 Tg N approximately 2.5 Tg was used to grow feed used for milk, egg and meat production.
15 This estimate is made assuming that 4 units of N are required to produce a unit of milk, eggs or meat
16 (see section 3.2.5.1.). This estimate also assumes that 1/3 of N required for livestock production comes
17 from commodities in the FAO top 20 list and the remaining 2/3 comes from alfalfa, silage and grass
18 over the course of a year (Oitjen and Beckett, 1996) Approximately 4.3 Tg of N in agricultural
19 commodities (2.8 Tg in soybeans, corn and wheat) were exported, while ~0.15 Tg N was imported in
20 various food and drink commodities. The US human populace consumed ~1.96 Tg of N in 2002 (292
21 million people, consume 114.7 g protein person⁻¹ day⁻¹, 0.16 g N g⁻¹ protein⁻¹, 365 days) (approximately
22 1.2 Tg from animal protein-N and 0.7 from vegetative protein).

23 These three consumption areas, internal consumption of vegetable N for livestock production, human
24 consumption, and export account for 77% of the commodities produced. The unaccounted for
25 commodity N is likely partly in annual storage. Some smaller fraction of annual production is used for
26 pet food and a small fraction is returned to the terrestrial environment because of spoilage and handling
27 losses.

28 In forests and grasslands (vegetated system) N input in 2002 was ~3.5 Tg of anthropogenically
29 introduced N, with the remaining ~10.1 Tg derived from BNF and livestock manure deposition. Of this
30 anthropogenic N, ~21% was retained in soil and tree biomass while the remainder was removed in tree
31 harvest (~0.2 Tg, see section 2.3.2.3) or lost to other parts of the environment through NH₃ volatilization
32 and NO₃⁻ leaching and runoff (Table 14). Total N input into agricultural systems was ~20 Tg with ~ 11
33 Tg being removed as products which includes the transfer of ~2 Tg N as food to the human population.
34 Almost 40% of the N input into agricultural systems is lost through NH₃ volatilization,
35 nitrification/denitrification and NO₃⁻ runoff. The 4.2 Tg of Nr of Haber-Bosch N that is used for
36 industrial feedstock is not included in this assessment. Of the input of ~3.3 Tg of N into the populated
37 system ~80% is lost through human excreta processed in sewage treatment plants, denitrification in soils
38 and leaching and runoff of NO₃⁻ (Table 14).

1 Table 14 summarizes the input and flow of Nr in the main terrestrial systems within the continental US.
 2 Anthropogenic input of Nr into forests and grasslands totaled ~3.5 Tg in 2002 with an estimated 6.4 Tg
 3 of Nr being introduced through natural biological N fixation. Of this Nr ~ 0.7 Tg was stored in
 4 vegetation and soils (see section 3.3.2) and ~2 Tg removed as livestock forage, while the remainder was
 5 lost to the atmosphere and aquatic systems, or removed as forest products and livestock forage. The
 6 largest anthropogenic Nr input (~20 Tg) was into agricultural production where ~11.2 Tg was removed
 7 as agricultural product, ~ 2 Tg transferred as edible product to the “populated” portion of the terrestrial
 8 system, ~0.8 Tg was stored in agricultural lands, and ~7.6 Tg N was lost to the atmosphere and aquatic
 9 systems. New N input into the “Populated” portion totaled ~3.3 Tg, which came from N transfer in food
 10 and use of fertilizer N in lawns, gardens and recreational areas. Within these areas an estimated 0.12 Tg
 11 was stored in urban forests.

12 **Table 14: Nr input and flows (Tg N/yr) in the terrestrial portion of the Nitrogen Cascade (Figure**
 13 **3) within the continental US in 2002**

Environmental System*	N Input	N Storage**	Products	Loss
Vegetated	13.6	0.7	2.2	10.7
Agricultural	19.6	0.8	11.2	7.6
Populated	3.3	0.1	0	3.2

14 *The Environmental Systems are those noted in the Terrestrial portion of the N Cascade shown in
 15 Figure 3. **Estimates are from section 2.3.2.

16 **Finding 8**

17 Although total N budgets within all terrestrial systems are highly uncertain, Nr losses from grasslands
 18 and forests (vegetated) and urban (populated) portions of the N Cascade appear to be higher, on a per
 19 cent of input basis, than from agricultural lands. The relative amount of these losses ascribed to
 20 leaching, runoff and denitrification, are as uncertain as the N budgets themselves.

21 **Recommendation 8:** *EPA should join with USDA, DOE, and universities should work together in*
 22 *efforts to ensure that the N budgets of terrestrial systems are properly quantified and that the magnitude*
 23 *of at least the major loss vectors are known.*

24 **2.3.1.3 Transfer of Nr to aquatic systems**

25 Within the nitrogen cascade, Nr flows from the atmosphere and terrestrial systems into aquatic systems.
 26 Aquatic systems include groundwater, wetlands, streams and rivers, lakes and the coastal marine
 27 environment. Nr is deposited directly into surface aquatic systems from the atmosphere (direct
 28 deposition) and Nr that is not either stored or removed as products on terrestrial systems eventually
 29 moves into aquatic systems (indirect deposition). What is the concern about too much Nr in aquatic

1 systems? EPA’s Office of Water (EPA, 2007d) notes the following reasons for implementing numerical
2 water quality standards:

- 3 • *Excessive nutrients (nitrogen and phosphorus) can cause negative ecological impacts to water*
4 *bodies on a national scale by stimulating harmful algal blooms.*
 - 5 • *Algal blooms block sunlight and result in the destruction of submerged aquatic vegetation*
6 *which serves as critically important habitat and food for many organisms.*
 - 7 • *Algal blooms eventually die off and consume dissolved oxygen from the water column which*
8 *can lead to die off of aquatic organisms.*
 - 9 • *One result of algal blooms is decreased biological diversity and populations, including*
10 *smaller populations of game and commercial fish.*
 - 11 • *Some blooms, considered “harmful algal blooms” or “HABs”, have a toxic effect on living*
12 *organisms and are disruptive of ecosystem structure and transfer of energy to higher trophic*
13 *levels.*
- 14
- 15 • *Excessive nutrients also pose public health risks.*
 - 16 • *Algal blooms can cause taste and odor problems in drinking water.*
 - 17 • *Hazardous algal blooms can cause respiratory distress and neurological problems in*
18 *swimmers.*
 - 19 • *Excessive nitrates can cause blue baby syndrome.*
- 20
- 21 • *Nutrient pollution is occurring at a national scale and has not been completely addressed .*
 - 22 • *49 states and 4 territories have 303(d) listings due to nutrients, and about 50% of the states*
23 *have greater than 100 water quality impairments due to nutrients .*
 - 24 • *Over 10,000 impairments are a result of nutrient pollution .*
- 25

26 Mitsch et al. (2001) suggest that streams and rivers themselves are not always as much affected by
27 nutrient loading as are lakes, wetlands, coastal areas and other lentic bodies of water. However, in most
28 cases, these nutrient-enriched waterways flow to the sea, with eutrophication of coastal waters the
29 unfortunate result. This problem now occurs regularly throughout the world (WRI, 2007), in locations
30 such as the Gulf of Mexico (Rabalais et al. 1996), the Baltic Sea (Larson et al. 1985), and the Black Sea
31 (Tolmazin 1985).

32 During the past century, following large-scale use of synthetic N fertilizers in agriculture, rapid
33 expansion of industrial and transportation-related fossil fuel combustion and coastal urbanization,
34 humans have significantly altered the balance between “new” N inputs and N losses in the marine
35 environment (Codispoti et al. 2001, Galloway and Cowling 2002). During this time frame, terrestrial
36 discharge and atmospheric N emissions have increased by 10 fold (Howarth et al. 1996, Holland et al.,
37 1999). This number keeps growing as human development continues to expand in coastal watersheds
38 (Vitousek et al. 1997).

1 For at least 50 years, researchers have recognized this growing imbalance, especially in estuarine and
2 coastal waters where anthropogenically-derived N over-enrichment has fueled accelerated primary
3 production, or “cultural” eutrophication (Vollenweider et al. 1992, Nixon 1995). Eutrophication is a
4 condition where nutrient-enhanced primary production exceeds the ability of higher ranked consumers
5 and organic matter-degrading microbes to consume and process it. D’Elia (1987) characterized this
6 condition as “too much of good thing” or over-fertilization of N-limited marine ecosystems with “new”
7 N, a bulk of it being anthropogenic (Howarth et al. 1986, Vitousek et al. 1997, Galloway and Cowling
8 2002). Symptoms of N-driven eutrophication vary from subtle increases in plant production to changes
9 in primary producer community composition, to rapidly accelerating algal growth, visible discoloration
10 or blooms, losses in water clarity, increased consumption of oxygen, dissolved oxygen depletion
11 (hypoxia), which is stressful to resident fauna and flora, or in the case of total dissolved oxygen
12 depletion (anoxia), elimination of habitats (Paerl 1988, 1997, Diaz and Rosenberg 1995, Rabalais and
13 Turner 2001). Other effects include submerged aquatic vegetation (SAV) losses, possible impacts on
14 tidal wetland health, and disruption of estuarine food chain dynamics that may favor an imbalance
15 towards lower trophic levels (e.g., jellyfish).

16 Anthropogenic or cultural eutrophication has been closely linked to population densities in coastal
17 watersheds (Peierls et al., 1991, Nixon 1995, Vitousek et al. 1997). Primary sources of N enrichment
18 include urban and agricultural land uses as well as wastewater treatment plants, most of which have not
19 been designed to remove nutrients. A significant, and in many instances increasing, proportion of “new”
20 N input can also be attributed to remote sources residing in airsheds. Delivery routes can also be
21 complex, especially when via subsurface aquifers outside the immediate watershed, which can confound
22 source definition and create long delays in delivery and management response (Paerl 1997, Jaworski et
23 al., 1997, Galloway and Cowling 2002, Paerl et al. 2002).

24 The area of an airshed generally greatly exceeds that of a watershed for a specific estuary or coastal
25 regions. For example, the airshed of the Baltic Sea includes much of western and central Europe
26 (Asman 1994, Hov et al., 1994), while the airsheds of the US’s two largest estuarine ecosystems, the
27 Chesapeake Bay and Albemarle-Pamlico Sound, are 15 to over 30 times the size of their watersheds
28 (Dennis 1997). Thus, the airshed of one region may impact the watershed and receiving waters of
29 another, making eutrophication a regional-scale management issue (Paerl et al. 2002, Galloway and
30 Cowling 2002). Furthermore, atmospheric N inputs do not stop at coastal margins. Along the North
31 American Atlantic continental shelf, atmospheric N inputs more than match riverine inputs (Jaworski et
32 al., 1997, Paerl et al., 2002), underscoring the fact that N-driven marine eutrophication may require
33 regional or even global solutions. Even in truly oceanic locations (e.g. Bermuda), North American
34 continental atmospheric N emissions (reduced and oxidized N) are commonly detected and significant
35 (Luke and Dickerson 1987, Prospero et al. 1996). Likewise, islands in the North Pacific receive N
36 deposition originating in Asia (Prospero et al., 1989).

37 Riverine and atmospheric “new” N_r inputs in the North Atlantic Ocean basin are at least equal and may
38 exceed “new” N_r inputs by biological N_2 fixation (Howarth et al. 1996, Paerl and Whitall 1999, Paerl et
39 al. 2002). Duce et al. (2008) estimate that up to a third of ocean’s external N_r supply enters through

1 atmospheric deposition. Schlesinger (2009) estimated that global atmospheric transport of Nr from land
2 to sea accounts for the movement almost one third of the annual terrestrial Nr formation. This
3 deposition leads to an estimated ~ 3% of new marine biological production and increased oceanic N₂O
4 production. Therefore, our understanding of marine eutrophication dynamics, and their management,
5 needs to consider a range of scales reflecting these inputs, including ecosystem, watershed, regional and
6 global levels.

7 *Scope of the Problem in the US.* Over the past 25 years, there has been a growing recognition of cultural
8 eutrophication as a serious problem in coastal estuaries (NRC, 2000). Globally, Selman et al. (2008)
9 have reported “Of the 415 areas around the world identified as experiencing some form of
10 eutrophication, 169 are hypoxic and only 13 systems are classified as ‘systems in recovery’”.
11 Comprehensive surveys of US estuaries have been conducted by NOAA as part of the National
12 Estuarine Eutrophication Assessments (NEEA) in 1999 and 2004 (Bricker et al. 1999; 2007). The most
13 recent report, released in 2007 (Bricker et al., 2007) focused on nutrient enrichment and its
14 manifestations in the estuarine environment and relies on participation and interviews of local experts to
15 provide data for the assessment. Among the key findings for nearly 100 assessed US estuaries were that
16 eutrophication is a widespread problem, with the majority of assessed estuaries showing signs of
17 eutrophication—65% of the assessed systems, representing 78% of assessed estuarine area, had
18 moderate to high overall eutrophic conditions. The most common symptoms of eutrophication were high
19 spatial coverage and frequency of elevated chlorophyll *a* (phytoplankton)—50% of the assessed
20 estuaries, representing 72% of assessed area, had a high chlorophyll *a* rating.

21 Further field evaluations by EPA and state and university collaborators under the National Coastal
22 Assessment (NCA) using probabilistic monitoring techniques The NCA National Coastal Condition
23 Reports (EPA, 2001, 2004 and 2006) are more closely related to nutrient enrichment assessments,
24 especially for manifestations of nutrient enrichment such as hypoxia, nuisance algal blooms, and general
25 habitat degradation. The last comprehensive national NCCR was published in 2004 (EPA, 2004) with a
26 more recent assessment focused on 28 National Estuary Program estuaries published in 2007 (EPA,
27 2006). The 2004 NCCR included an overall rating of “fair” for estuaries, including the Great Lakes,
28 based on evaluation of over 2000 sites. The water quality index, which incorporates nutrient effects
29 primarily as chlorophyll-*a* and dissolved oxygen impacts, was also rated “fair” nationally. Forty percent
30 of the sites were rated “good” for overall water quality, while 11% were “poor” and 49% “fair”.

31 A recent evaluation of decadal-scale changes of NO₃⁻ concentrations in ground water supplies indicates
32 that there is a significant increase in nitrate concentrations in well water across the US (Rupert, 2008).
33 This study compared the nitrate content of 495 wells during 1988-1995 with nitrate content found during
34 2000-2004 as a part of the United States Geological Survey, National Water-Quality Assessment
35 Program. From a subset of wells that had data on ground water recharge so that correlations with
36 historic fertilizer use could be made, the study concluded that nitrate concentrations in ground water
37 increased in response to the increase of N fertilizer use.

Text Box 1: Hypoxia in the Gulf of Mexico

An example of a problem of excess Nr that moves from one part of the US to another is the movement of Nr from the states that make up the Mississippi River drainage to the Gulf of Mexico. A hypoxic zone covers a significant area of the receiving bottom waters of the continental shelf of the northern Gulf of Mexico (details may be gleaned from SAB, 2007). This is a seasonally severe problem that has persisted there for at least the past 20 years. Between 1993 and 1999 the hypoxia zone ranged in extent from 13,000 to 20,000 km² (Rabalais et al. 1996, 1999, Rabalais and Turner 2001). The hypoxia is most widespread, persistent, and severe in June, July, and August, although its extent and timing can vary, in part because of the amplitude and timing of flow and subsequent nutrient loading from the Mississippi River Basin. The waters that discharge to the Gulf of Mexico originate in the watersheds of the Mississippi, Ohio, and Missouri Rivers (collectively described here as the Mississippi River Basin). With a total watershed of 3 million km², this basin encompasses about 40% of the territory of the lower 48 states and accounts for 90% of the freshwater inflow to the Gulf of Mexico (Rabalais et al. 1996; Mitsch et al. 2001; EPA, 2007b).

The report, *Hypoxia in the Northern Gulf of Mexico. An update by the EPA Science Advisory Board*. December, 2007 (SAB, 2007) determined that “To reduce the size of the hypoxic zone and improve water quality in the Basin, the SAB Panel recommends a dual nutrient strategy targeting at least a 45% reduction in riverine total nitrogen flux (to approximately 870,000 metric tons/yr) and at least a 45% reduction in riverine total phosphorus flux (to approximately 75,000 metric tons/yr). Both of these reductions refer to changes measured against average flux over the 1980 - 1996 time period. For both nutrients, incremental annual reductions will be needed to achieve the 45% reduction goals over the long run. For nitrogen, the greatest emphasis should be placed on reducing spring flux, the time period most correlated with the size of the hypoxic zone.”

Finding 9

Over the past 25 years, there has been a growing recognition of eutrophication as a serious problem in coastal estuaries (NRC, 2000). The last comprehensive national NCCR was published in 2004 (EPA, 2004) included an overall rating of “fair” for estuaries, including the Great Lakes, based on evaluation of over 2000 sites. The water quality index, which incorporates nutrient effects primarily as chlorophyll-a and dissolved oxygen impacts, was also rated “fair” nationally. Forty percent of the sites were rated “good” for overall water quality, while 11% were “poor” and 49% “fair”.

Recommendation 9: *The committee recommends that EPA consider a range of scales reflecting ecosystem, watershed, and regional levels that include all inputs, e.g. atmospheric and riverine, of marine eutrophication dynamics and management.*

2.3.2. Storage of Nr within terrestrial ES

According to the nitrogen cascade conceptualization, terrestrial environmental systems are compartmentalized into agriculture, populated and vegetated systems. Annual input of Nr is greatest in agricultural ecosystems (farmland, cropland, and grazed pastureland) including Nr inputs, using 2002 as

1 the base year, of 9.8 Tg from synthetic fertilizer, 7.7 Tg from biological N fixation in crops (mainly
2 soybeans), and 1.3 Tg from atmospheric deposition. Nr input into vegetated systems (mostly forested,
3 but including non-cropland grasslands and other natural vegetation types as well) comes mostly from
4 atmospheric deposition (3.2 Tg). Annual input of Nr into populated systems includes synthetic fertilizer
5 application to urban turfgrass and recreational areas (~1.1 Tg), and atmospheric deposition 0.2 Tg (Table
6 13.).

7 Much of the annual Nr input into these terrestrial systems passes through, and is transferred within,
8 terrestrial systems or atmosphere via NH_3 , NO_x or N_2O , or aquatic environmental systems via NO_3^- and
9 organic N leaching and runoff or NH_x and NO_y deposition.

10 The largest single reservoir of total N in the terrestrial environmental system is soil organic matter
11 (SOM). Approximately 52,000 Tg C and 4,300 Tg N are contained in the upper 100 cm of soil in the 48
12 contiguous states (N is estimated from assumed C/N ratio of 12) (Lal et al. 1998). For comparison, the
13 total above ground biomass of US forests of these states contains ~ 15,300 Tg of C and ~ 59 Tg N
14 (estimated using a C/N ratio of 261, and 15,500 Tg of SOM-C, 1290Tg total N (estimated using a C/N
15 ratio of 12) (EPA, 2007g). Most of this SOM-N is bound within complex organic molecules that remain
16 in the soil for tens to thousands of years. A small fraction of this SOM is mineralized, converted to
17 carbon dioxide and Nr, annually. The total N contained within above and below ground compartments
18 isn't really of concern. What is of interest in addressing issues of Nr, is the change in N stored within
19 the compartments of terrestrial systems. The pertinent question is whether N is being retained or
20 released from long-term storage. The committee evaluated estimates of annual change of N storage
21 within important components of terrestrial systems. The EPA Inventory of US Greenhouse Gas
22 Emissions and Sinks 1990-2005 (USEPA 2007g) carbon stock information obtained from chapter 7 of
23 the report provided information used by the committee to estimate N storage in US terrestrial systems.
24 Nitrogen stock change was determined by simply assigning a C/N ratio of 12 for soils and 261 for trees
25 and making the appropriate conversions from C to N.

26 2.3.2.1. *Agricultural*

27 Croplands within the contiguous 48 states occupy ~149 million ha (19%) of the 785 million ha of land
28 area, of which 126 million ha were cultivated in 2002 (NRCS, 2007;
29 www.nrcs.usda.gov/technical/land/nrio3/national_landuse.html). Croplands are generally found on well
30 drained mineral soils (organic C content 1-6% in the top 30 cm). Small areas of drained organic soils
31 are cultivated (organic C content of 10-20%) in mainly Florida, Michigan and Minnesota (EPA, 2007g).
32 Organic soils lost ~0.69 Tg of Nr in 2002 while mineral soils accumulated ~1.5 Tg of Nr (Table 15).
33 Much of the accumulation of SOC was due to the use of conservation tillage and high yielding crop
34 varieties (EPA, 2007g). Losses of Nr from organic soils are due to mineralization of SOM and release
35 of Nr input. In cultivated soils annual input of new Nr is approximately 9.7 Tg from fertilizer N, 1.1 Tg
36 from livestock manure (recycled N), ~7.7 Tg from biological N fixation and 1.2 Tg from atmospheric
37 deposition. Assuming that loss of fertilizer N from the small area of organic soils is a minor fraction of
38 the total, then ~17% of N input from synthetic fertilizer, ~12% of total N input, is stored in cropland
39 mineral soils annually.

1 2.3.2.2. *Populated systems—urban lands*

2 Populated or “developed land” (developed land is the terminology used by NRCS) occupied ~42.9
3 million ha of the US land area in 2002. This equates to approximately 5.5% of the US land area (NRCS,
4 2007). The EPA Inventory of U.S. Greenhouse Gas Emissions and Sinks (EPA, 2008) indicates that
5 urban areas cover over 4.4% of the land area with tree canopy covering 27.1% of the urban area. The
6 tree-covered area constitutes approximately 3% of total tree cover in the continental U.S. If the NRCS
7 value of 42.9 million ha is used, then trees cover ~11.3 million ha of urban land in the contiguous 48
8 states. Another ~ 14.2 million ha of land is covered by turf grass in parks, golf courses, and lawns. In
9 both urban forests and turf grass, N storage is dependent upon the age of the trees or turf. In young,
10 pre-steady state, systems N is being accumulated while at steady state no net change occurs. Some areas
11 may be degrading and actually losing biomass and returning N to the environment. EPA (2007g) does
12 not estimate carbon changes in turf grass, but does estimate changes in carbon storage in urban forests.
13 Urban trees sequestered an estimated net 22 Tg of carbon and 0.12 Tg of N in 2002 (using the hardwood
14 C/N ratio of 186) (EPA, 2007g). Annual fertilizer N input into the urban landscape is approximately
15 10% of total fertilizer N consumption in the U.S. (EPA, 2007g), or ~1 Tg of N in 2002. Another 0.2-1.0
16 Tg N is deposited from atmospheric deposition, which can be disproportionately high due to locally high
17 NO_y concentrations. Storage of ~0.12 Tg N in urban forests constituted approximately 3% of N input
18 annually.

19 2.3.2.3. *Vegetated systems—forests and grasslands*

20 *Forests.* Forests cover approximately 164 million ha, ~21% of the land area of the contiguous 48 states
21 (NRCS, 2007). The forest carbon stocks analysis by EPA (2007g) is based on state surveys that are
22 conducted every 1 to 10 years. Annual averages are applied to years between surveys. Changes in C
23 related to the rate of tree growth, the highest rate is in the Pacific northwest. Birdsey (1992) estimated
24 that 52,500 Tg of C in above and below ground in U.S. forests; soil contains 59% of total C, 9% in litter
25 and 5% in tree roots. The EPA estimate for 2002 is 43,600 Tg of C. For the following N storage
26 estimate, based on EPA (2007g) data, we have assumed that forests are 85% softwood and 15%
27 hardwood with an average C/N ratio = 261. These estimates indicate that forests and forest products
28 stored ~0.43 Tg of N in 2002 (Table 15)

29 *Grasslands.* Grasslands, including rangelands and pasturelands, occupy approximately 213 million ha
30 (27.1%) of the contiguous 48 state land area. The NRCS divides these grasslands into pastureland (48.2
31 million ha) and rangeland (164 million ha). Pastureland is managed, may be fertilized and mown, and
32 rangeland is managed only to the extent that livestock grazing intensity on the land used for livestock
33 grazing is regulated. Changes in the N status of grasslands are dependent upon changes in soil organic
34 matter as the above ground biomass produced annually is either consumed by livestock or decomposed
35 in the field. Soil organic C stocks were estimated using the Century biogeochemical model and data
36 used were based upon the NRCS/National Resources Inventory (NRI) survey (EPA, 2007g). Changes in
37 soil N content were estimated using a C/N ratio = 12. Nitrogen input into rangelands is generally only
38 from atmospheric deposition, which contributes 1.9 Tg N each year to range production (Table 15).
39 Rangeland tends to be in relatively remote areas where atmospheric N deposition is low

1 Collectively, forests and grasslands stored ~0.74 Tg of N in 2002. Much of the soil N storage in
2 grasslands is a result of conversion of croplands to grasslands, mainly due to the conservation reserve
3 program. Forest soils appear to be losing N while overall N storage is from accumulation in above
4 ground biomass and that that remains in forest products that are stored for long periods.

5 *2.3.2.4. Summary of estimates of Nr stored in terrestrial systems in 2002*

6 An estimated 1.7 Tg of N was stored in the terrestrial systems of the contiguous 48 states in 2002 (Table
7 15). Soils were the largest reservoir with croplands (0.82) and grasslands (0.31) sequestering most of
8 the N. Estimated total Nr input from synthetic fertilizer, biological N fixation and atmospheric
9 deposition into terrestrial systems within the contiguous 48 states in 2002 was ~32 Tg . Although
10 uncertainty of the storage estimate needs to be assessed, it is probably at least +/-50%. Annual storage
11 in agricultural, grassland and forest soil and in forest biomass is approximately 6 to 10 % of annual Nr
12 input. All of the input and outflow numbers are highly uncertain, but N loss through denitrification
13 appears to be the major loss mechanism. As with the 16 northeastern US watershed example, discussed
14 in section 2.3.3, and, as concluded in a recent global Nr review by Schlesinger (2009), storage in soils
15 and trees accounts for only a small portion of the annual N input while apparent loss through
16 denitrification dominates the budget. Some small fraction is re-volatilized and exported from the
17 continent.

Table 15: Net Annual Change in Continental US Croplands soil C and N, Forest C and N, and Grassland Soil C and N in 2002

Measurements in Tg. Negative sign indicates a decrease in storage: positive number indicates increase in storage, soil C/N ratio = 12; wood C/N = 261 (C storage numbers were obtained from EPA, 2007g).

	C	N
<i>Cropland</i>		
Cropland remaining cropland		
Mineral soil	17	1.4*
Organic soil	-8.3	-0.69
Land converted to cropland	0.8	0.067
Total	9.6	0.80
<i>Forests</i>		
Forests and harvested wood products		
Above ground biomass	85	0.32
Belowground biomass	16	0.063
Dead wood	9.1	0.035
Litter	7.2	0.028
Soil organic matter	-2.8	-0.23
Harvested Wood	59	0.22
Total	173	0.43
<i>Grasslands</i>		
Grasslands remaining grasslands		
Mineral soil	-0.8	-0.067
Organic soil	-1.3	-0.11
Lands Converted to Grasslands	5.8	0.48
Total	3.7	0.31
US Total C & N Storage in 2002	186	1.7 ⁷

⁷ According to the USEPA National Greenhouse Inventory (EPA 2007b) the net increase in soil C stocks over the period from 1990 through 2005 was largely due to an increase in annual cropland enrolled in the Conservation Reserve Program, intensification of crop production by limiting the use of bare-summer fallow in semi-arid regions, increased hay production, and adoption of conservation tillage (i.e., reduced- and no-till practices). The above EPA estimates assume that no-till crop production results in net carbon sequestration. Recent publications indicate, however, that no-till cropping practices do not result in net carbon sequestration (Baker et al. 2007; Blanco-Canqui, H. and R. Lal. 2008; Verma et al., 2005), which means the above estimates of soil C and N storage in mineral soils may need to be reconsidered. These new studies suggest that organic C conservation by reduced tillage practices has been overestimated because soil sampling and analysis has been confined to the top 30 cm of soil when the top meter of soil needs to be considered. Baker et al. and Verma et al. also show that long-term, continuous gas exchange measurements have not detected C gain due to no-till. They concluded that although there are other good reasons to use no-till, evidence that it promotes C sequestration is not compelling. These findings highlight the need for appropriate assessment of ecosystem N storage so that this committee's conclusion that only a small part of annual Nr input is stored in agricultural lands, forests, and grasslands can be confirmed or disproven.

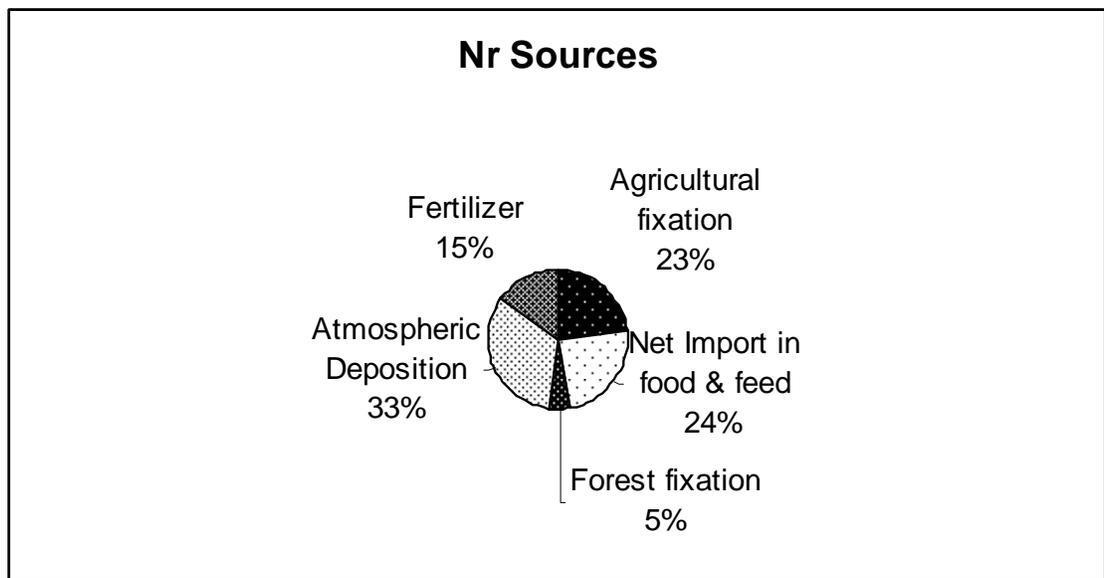
1 **2.3.3 Input and fate of Nr in 16 watersheds in the northeast US.**

2 There are no comprehensive_data available to assess the transfer and transformations in and between the
3 atmosphere, terrestrial systems (agriculture, populated and vegetated systems) and aquatic systems
4 nationally. Determining a national N budget is a priority research area. As there are no national data
5 available, an example analysis of Nr input and fate in 16 watersheds in the northeastUS, for which data
6 are available, is used to show an evaluation of the inputs and fate of Nr for a large watershed (Fig. 3-14)
7 (Van Breemen et al. 2002).

8 The watersheds in this study encompass a range of climatic variability, Maine to Virginia. The
9 watersheds are a major drainage to the coast of the North Atlantic Ocean. Using data from the early
10 1990s, Boyer et al. (2002) reported the quantification of N inputs to each watershed from atmospheric
11 deposition, N fertilizers, biological N fixation, and import of N in agricultural products (food and feed).
12 They compared inputs with N losses from the system in riverine export. As a part of the same study,
13 Van Breemen et al. (2002) analyzed the fate of N inputs to these watersheds and developed budgets for
14 each watershed. The total area of the watersheds was 32,666 km² with land use categories of forest
15 (72%), agricultural (19%), urban (3%), wetlands (5%), and 1% other uses. The Nr input into the
16 watersheds (using weighted averages for all 16 watersheds) was 3,420 kg per square km per year
17 (hereafter expressed as kg /km² /yr). Figure 17 shows the Nr sources and the estimated fate of this Nr as
18 a per cent of the weighted average Nr input.

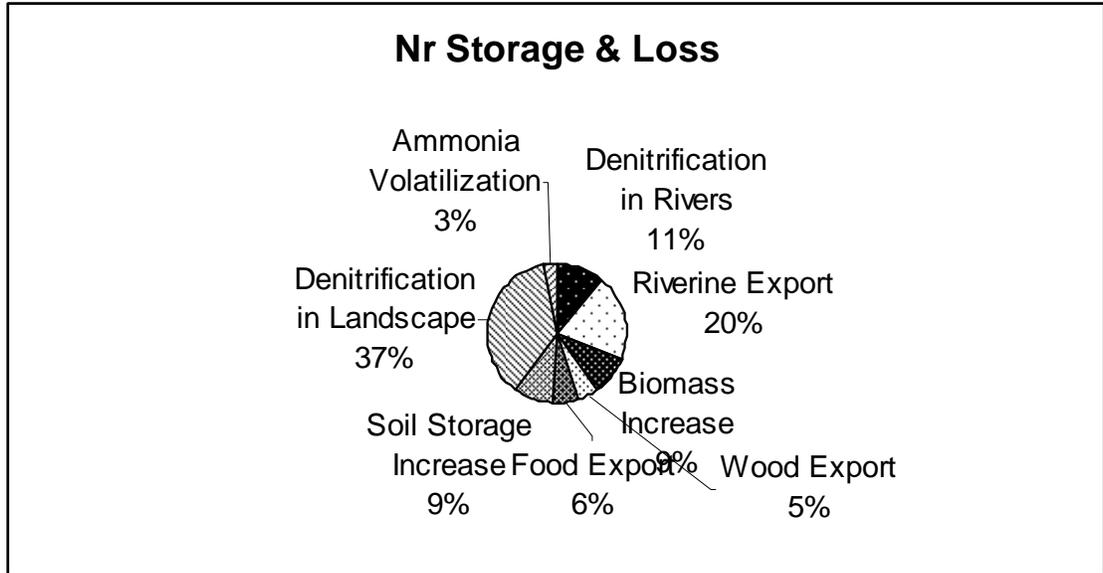
19 **Figure 17: Nr input and loss from 16 watersheds in the northeast US.**

20 The Nr input into the watersheds (using weighted averages for all 16 watersheds) was 3,420 kg
21 /km²/yr (Van Breemen et al. 2002).



22

23



1

2 Van Breemen et al. (2002) indicate that Nr inputs and storages and losses were well correlated ($R^2 =$
3 0.98). Denitrification in landscape soils is the most uncertain estimate, because rates are calculated by
4 difference between total inputs and outputs, so they accumulate errors from all estimates. They suggest
5 that the denitrification loss term may also reflect the change in N storage in groundwater. The net
6 storage of N in the soil (18% of total storage and losses) indicates that there is a non-steady state
7 condition in the soil. Increasing storage of Nr on land implies that drainage and denitrification exports
8 of Nr are likely to increase when a new steady state condition is reached.

9 These data suggest that Nr research need to focus on understanding the “denitrification” loss term in this
10 analysis. The losses occur in the terrestrial landscape, before Nr enters the river. Where do these losses
11 occur, within the agricultural field, in drains and ditches near the agricultural field, in riparian areas, or
12 wetlands? Understanding this term may help in the management of Nr in watersheds to decrease nitrate
13 movement into aquatic systems as well as to limit N_2O emissions to the atmosphere.

14 The Van Breemen et al. (2002) study also estimated that approximately 30% of N input was exported to
15 the rivers and about two thirds (20% of total N input) of this N was exported to coastal waters by rivers.
16 The remaining one third (11% of total N input) was considered to have been denitrified in the rivers.
17 These examples also demonstrate that Nr in the atmosphere, terrestrial systems and aquatic systems are
18 not separate and must be considered collectively. Atmospheric deposition is a variable, but important
19 input into aquatic systems that contributes to Nr enrichment problems. Aquatic and terrestrial systems
20 process this Nr and return other Nr gases (NH_3 , NO_x and N_2O to the atmosphere). Nr from terrestrial
21 systems impacts both the atmosphere and aquatic systems through emission of NH_3 , NO_x , N_2O and
22 leaching and runoff of NO_3^- .

1 **Finding 10**

2 Denitrification of Nr in terrestrial and aquatic systems is one of the most uncertain parts of the nitrogen
3 cycle. Denitrification is generally considered to be a dominant N loss pathway in both terrestrial and
4 aquatic systems, but it is poorly quantified

5 **Recommendation 10:** *EPA, USDA, DOE, and universities should work together to ensure that*
6 *denitrification in soils and aquatic systems is properly quantified, by funding appropriate research.*

7 **2.3.4. Synopsis of areas of the US nitrogen cascade where the estimates of Nr transfer and**
8 **transformations in and between environmental systems are highly uncertain.**

9 In developing the discussion of Nr transfers and transformations in and between the environmental
10 systems of the nitrogen cascade, the committee has encountered a number of areas where quantities or
11 flows of Nr are highly uncertain. All of these areas need attention from EPA in conjunction with other
12 federal and state agencies and universities. Although most of the following points have been highlighted
13 in various "Findings" and "Recommendations," within chapter three of this report we feel the need to
14 highlight the following areas:

- 15 • Total denitrification in animal feeding operations, in soils, and in aquatic systems needs to be
16 quantified along with all gaseous products that are produced and released to the atmosphere
17 during nitrification/denitrification. These gases include NO_x, N₂O and N₂.
- 18 • The amount of Nr deposited in each environmental system as dry deposition needs to be
19 quantified and monitored.
- 20 • Rates and amount of ammonia emission from fertilized soils and animal feeding operations need
21 to be quantified and the fate of this ammonia determined.
- 22 • The annual change in N storage in soils (agricultural, forest , grassland and urban areas) needs to
23 be quantified in conjunction with the change in carbon

24 These areas of high uncertainty are highlighted because very little information exists in some of the
25 areas while in other areas, such as denitrification and the relative release of N₂O from soils and aquatic
26 systems, the sparse data are highly variable which makes developing meaningful guidelines for control
27 difficult.

28 **2.3.4. Synopsis of areas of the U.S. nitrogen cascade where the estimates of Nr transfer and**
29 **transformations in and between environmental systems are highly uncertain.**

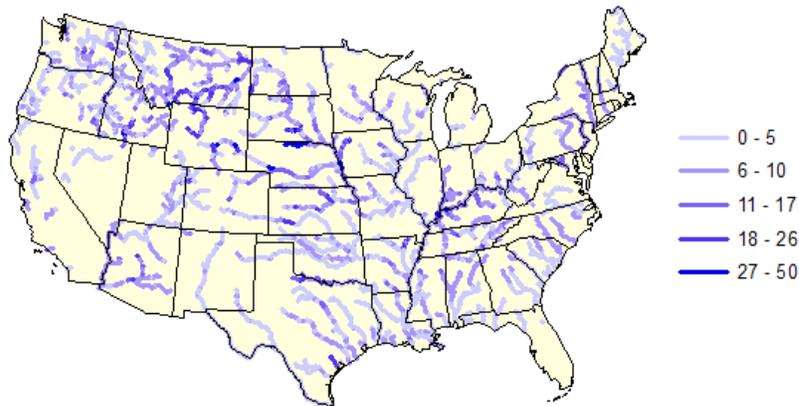
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13 areas while in other areas, such as denitrification and the relative release of N_2O from soils and aquatic
14 systems, the sparse data are highly variable which makes developing meaningful guidelines for control
15 difficult.

16 **Figure 18: Total Nr yields (kg/ha/yr) in large rivers of the U.S. (Alexander et al. 2008).**



18 **2.4 Impacts, metrics, and current risk reduction strategies for Nr**

19 **2.4.1 Measurement of N in the environment**

20 Although N is among the most abundant elements on earth, only a small fraction, Nr is responsible for
21 impacts on the environment. Most regulations focus narrowly on specific chemical forms of nitrogen as
22 they affect media- or site-specific problems, setting limits or specifying control technologies without
23 regard to the ways in which N is transformed once introduced into the environment. Measurement
24 methods are typically expressed in terms of mass loadings or concentrations of a particular form of N,
25 e.g. ppm NO_x , mg/l total NH_x , or kg/ha of NO_3^- .

1 **Finding 11**

2 The committee finds that there is a need to measure, compute, and report the total amount of Nr present
3 in impacted systems in appropriate units. Since what is measured influences what we are able to
4 perceive and respond to; in the case of Nr, it is especially critical to measure total amounts and different
5 chemical forms, at regular intervals over time.

6 **Recommendation 11.** *The committee recommends that EPA routinely and consistently account for the*
7 *presence of Nr in the environment in forms appropriate to the medium in which they occur (air, land,*
8 *and water) and that accounting documents be produced and published periodically (for example a*
9 *fashion similar to National Atmospheric Deposition Program (NADP) summary reports). The committee*
10 *understands that such an undertaking will require substantial resources, and encourages the Agency to*
11 *develop and strengthen partnerships with appropriate federal and state agencies, and private sector*
12 *organizations, with parallel interests in advancing the necessary underlying science of Nr creation,*
13 *transport and transformation, impacts, and management.*

14 **2.4.2 General considerations for Nr impacts**

15 *2.4.2.1 Historical measurement and impact categories*

16 The types of impacts of Nr in the environment are dependent on three general factors: the sources of Nr,
17 the types of media impacted, and Nr chemical forms. The magnitude of effects depends on loading and
18 the nature of the system impacted. As illustrated in Figure 3, the impacts of a given source of Nr can be
19 multiple as N is transformed in the environment and transported among ecosystem components. The
20 nitrogen cascade provides the ideal framework for understanding the role of Nr in the earth's ecosystems
21 and establishes a framework for developing and implementing management methods through which
22 beneficial effects can be enhanced while minimizing detrimental impacts.

23 A risk management paradigm in which various approaches are used to limit environmental impacts to
24 "acceptable" levels of risk is a useful concept for understanding the environmental impacts that Nr can
25 have. For this purpose, impacts are divided into several general categories within which various
26 contaminants have a direct correlation with damage. Risk "end points" are typically established through
27 reference to supporting scientific studies, location-specific conditions, and economic, safety, and social
28 factors.

29 Historically, EPA environmental protection programs have addressed impacts of Nr such as global
30 warming, eutrophication, ecotoxicity, human health (cancer and non-cancer), acidification, smog
31 formation, and stratospheric ozone depletion, among others (Bare et al 2003). Within these categories it
32 is sometimes possible to express end points in terms of collective metrics, such as is done with
33 greenhouse gases in the form of carbon dioxide equivalents, or acidification as H⁺ equivalents. This
34 approach has the considerable advantage of defining a straightforward framework within which
35 environmental standards can be derived that are protective of human health and the environment, EPA's
36 principal mission. This approach also encourages evaluation of damage from multiple sources as long as
37 the characterization metric used is genuinely representative of the impact of a given contaminant. Thus,

1 for example, the total impact of acidic gases such as SO₂ and NO_x on the acidification of watersheds can
 2 be expressed as a common metric. However, metrics for human health are generally not as simple to
 3 characterize nor are the appropriate end points; thus, the mechanism of toxicity, number of individuals
 4 affected, value of lost workdays, medical treatment costs, and value of human lives lost may all be used.

5 *2.4.2.2 Ecosystem functions and services*

6 A complementary approach to classical impact characterizations is the use of ecosystem “service” and
 7 “function” categories, in which the impairment of a specific service provided by one or more ecosystems
 8 or impairment of an ecological function by causative contaminant emissions is assessed (Costanza 1997;
 9 WRI 2005). Such an approach is inherently attractive because of its basis in scientific reality, i.e. the
 10 health of humans is inextricably linked to the health of the environment. Less clear, in some cases, are
 11 ways in which to measure and monitor such impacts and account for the effects of a complex array of
 12 factors and stressors that contribute to, or damage, ecosystem service, function and health. Table 16
 13 provides examples of ecosystem services and corresponding functions.

14 **Table 16: Ecosystem service and corresponding function categories (Costanza et al. 1997)**

Ecosystem Service	Ecosystem Function
Gas regulation	Regulation of atmospheric chemical composition
Climate regulation	Regulation of global temperature, precipitation, and other biologically mediated climatic processes at global, regional, and local levels
Disturbance regulation	Capacitance, damping, and integrity of ecosystem response to environmental fluctuations
Water regulation	Regulation of hydrologic flows
Water supply	Storage and retention of water
Erosion control and sediment retention	Retention of soil within an ecosystem
Soil formation	Soil formation processes
Nutrient cycling	Storage, internal cycling, processing, and acquisition of nutrients
Waste treatment	Recovery of mobile nutrients, and removal or breakdown of toxic compounds

Pollination	Movement of floral gametes
Biological control	Trophic dynamic regulation of populations
Refugia	Habitat for resident and transient populations
Food production	That portion of gross primary production extractable as food
Raw materials	That portion of gross primary production extractable as raw materials
Genetic resources	Sources of unique biological materials and products
Recreation	Providing opportunities for recreational activities
Cultural	Providing opportunities for noncommercial uses

1

2 *2.4.2.3 Economic measures and impacts*

3 It is also possible to translate the effects of Nr into economic terms. Two economic measures that are
 4 used are the dollar costs of damages and the cost of remediation or substitution. Another important
 5 economic metric is the cost/ton of remediation for each form of Nr. Damage costs do not always scale as
 6 tons of Nr released into the environment. If damage costs rather than tons of nitrogen were utilized as a
 7 metric, the full implications of the cascade and the setting of priorities for intervention might differ.

8 It is important to note that the choice of metric used in assessing impacts may play an influential role in
 9 what and how one manages. Air and water protection laws state that the goal is “to protect human health
 10 and the environment.” Yet, there is no generally agreed-upon common metric for measuring the full
 11 range of effects (which are complex and often unknown) or for setting priorities in the establishment or
 12 implementation of policies.

13 As noted above, there are multiple metrics for measuring Nr or any other agent in the environment. The
 14 most common metric utilizes quantitative measures of the total amount of Nr (and any of its specific
 15 chemical forms) in different environmental reservoirs and the mass flux between them. But while
 16 providing common units, typically mass or concentration, these measures do not distinguish the relative
 17 societal costs of health or environmental consequences of reactive nitrogen of different forms or places
 18 in the cascade. While not all damages can be turned into economic costs (see Chesapeake Bay box), and
 19 the costs of some damages have not been quantified, enough of the major damages can be quantified
 20 economically to provide a useful complementary metric for decision-making.

21 The advantage of monetizing damages is that it reflects an integrated value that human society places on
 22 lost ecosystem goods and services in common currency and illustrates the cascading costs of damages as

1 Nr changes form and moves between different parts of the ecosystem. In addition, human health
2 implications can also be included as the cost of health care treatment, lost work days and other aspects
3 of morbidity and mortality (e.g., economic value of lives lost). A third metric is to look at morbidity
4 and/or mortality separately, and not monetize them with a cost value. Of course a concern, particularly
5 with respect to the economic metric, is that there are a number of ecosystem services that arguably
6 cannot be easily monetized, for example the loss of biodiversity and those ecosystem functions that are
7 affected by climate change or other stressors.

8 Ecosystem services considered to be regulating and supporting ecosystem services are particularly
9 difficult to fit into an economic metric. It is thus essential that a variety of complementary metrics be
10 used to assess the impact of anthropogenic Nr on the environment and human well being.

11 There is value in each of the ways that N metrics are expressed. Traditional categories provide a readily
12 adaptable framework for regulation, while ecosystem service and function-based categories provide a
13 richer context for stating the complex connections among Nr inputs and transformations and their
14 impacts on ecosystem health and human well-being. Dollar-based metrics provide a means of
15 identifying those effects that have the greatest impacts and costs to society.

16 **Finding 12**

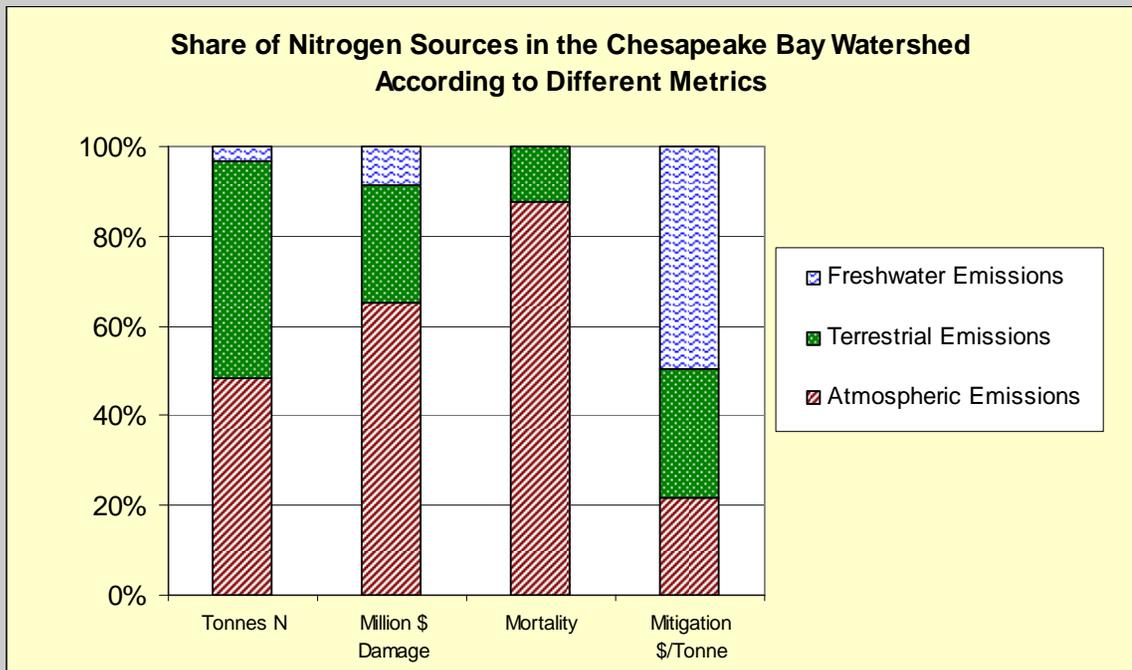
17 The committee finds that reliance on only one approach for categorizing the measurement of Nr is
18 unlikely to result in the desired outcome of translating N-induced degradation into the level of
19 understanding needed to develop support for implementing effective Nr management strategies.

20 **Recommendation 12.** *It is, therefore, recommended that the EPA examine the full range of traditional
21 and ecosystem response categories, including economic and ecosystem services, as a basis for
22 expressing Nr impacts in the environment, and for building better understanding and support for
23 integrated management efforts.*

24 **Text Box 2: Economic Impacts and Metrics for Chesapeake Bay**

25 Recently, the N cycle and the implications of the reactive nitrogen cascade were translated into
26 economic terms for the case of Chesapeake Bay (Moomaw and Birch 2005). As an illustration, each of
27 these metrics is shown as a percentage of Nr fluxes in the Chesapeake Bay water and air shed in Figure
28 20 below. Note that approximately 48% of N entering the watershed is coming through emissions to the
29 atmosphere, but they are causing 65% of the dollar damages and 88% of the human mortality. A nearly
30 equal percentage, 49%, of the Nr involves runoff from the land, but it accounts for only 26% of the
31 damage costs and 12% of the mortality. Fresh water releases of Nr account for only 3% of the Nr and
32 9% of the cost damages and contribute nothing to mortality losses. Hence freshwater releases in the
33 Chesapeake Bay ecosystem cause the smallest damage but account for the largest cost per MT to
34 mitigate. Costs of reactive N mitigation provide an additional economic measure of the cost
35 effectiveness of actions to reduce a ton of N.

1 **Figure 19: Relative importance of all reactive nitrogen sources in the Chesapeake Bay Watershed**
 2 **according to four different metrics.**



3
 4 The metrics are broken down further by the specific source of NO_x and NO_y emissions into each of the
 5 three media in Table 17

6 **Table 17: Alternative metrics for different atmospheric emissions and for terrestrial and**
 7 **freshwater releases of reactive NO_x and NO by source**

	Nr (mt)	\$ Damage (millions)	Mortality	Mitigation (\$/mt)
Atmospheric - Utility Emissions	150,000	510	309	\$6,500
Atmospheric - Mobile Source Emissions	190,000	642	389	\$15,000
Atmospheric - Point Source Emissions	48,000	162	98	\$23,000
Atmospheric - Area Source Emissions	98,000	334	203	\$5,100
Terrestrial Emissions	490,000	668	141	\$11,000
Freshwater Emissions	32,000	223	0	\$19,000

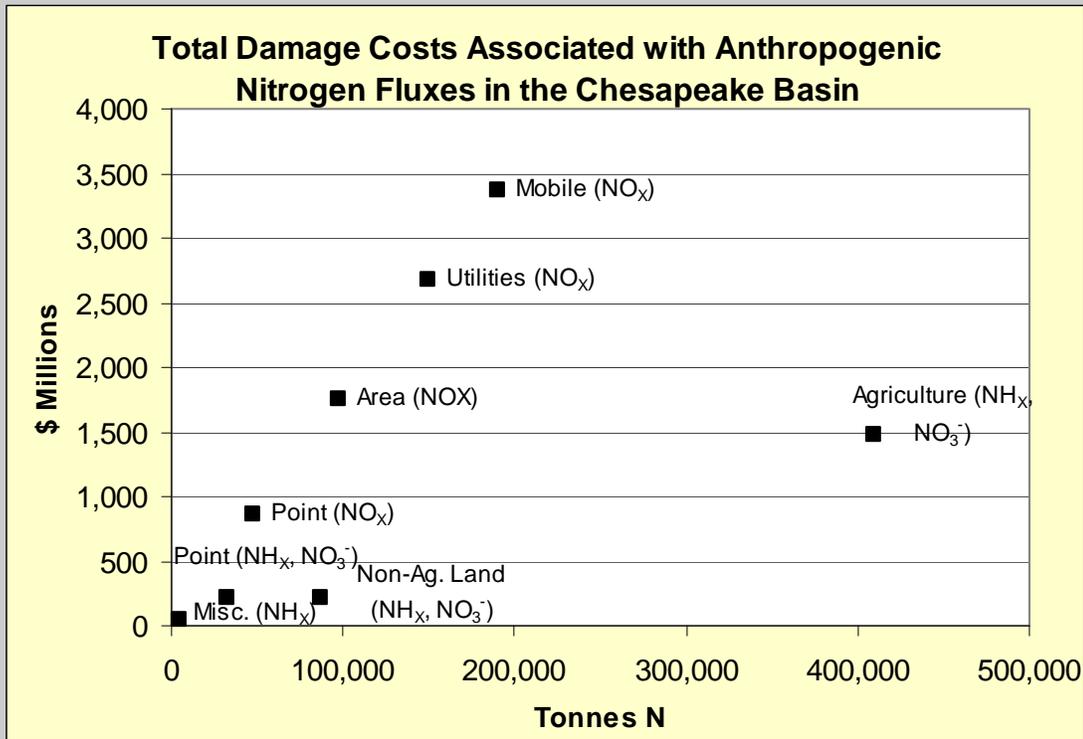
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The metrics of damage cost and mortality (morbidity shows a similar pattern to mortality, but is only one-tenth the damage cost) indicate that controlling emissions of NO_x from combustion and industrial processes produces greater gains in protecting human health and the environment, than does reducing Nr releases from the land even though the two sources are comparable in scale in terms of reactive forms of N released to the watershed. This difference occurs because emissions to the air cascade through more parts of the watershed ecosystem than do releases directly to the Bay. If human health effects are monetized, then the economic gains are even greater from reducing atmospheric emissions. See Figure 21.

Looking at the remediation cost of controlling releases to the environment, the least costly per ton of Nr or per dollar saved also comes from atmospheric emission controls. While most legislation constrains how cost for remediation can be considered, it is useful to know where the lowest cost options lie in setting priorities. These metrics provide several ways of looking at the nitrogen cascade and its impact on human health and the environment. However, there are many impacts that remain unaccounted for in any of these metrics. Some impacts could be quantified, but the necessary data have yet to be collected. Economic losses due to damage to recreational and commercial fisheries in the Bay and in freshwater are examples that are likely to be significant but have not yet been quantified.

And, finally, Nr is not the only stressor that can affect both human and environmental health. Researchers are challenged to comprehensively understand cause-and-effect relationships in a complex environment and to balance management actions and costs to ensure that management strategies are effectively minimizing risks and implemented.

1 **Figure 20: Total damage costs associated with anthropogenic nitrogen fluxes in the Chesapeake**
2 **Basin.**



3
4 Scatter plot of all quantifiable damage costs (including health impacts) relative to tons of Nr showing the
5 significant difference in emphasis of the two different metrics

6 Similarly, economic losses due to climate change and ozone depletion from N₂O emissions have not
7 been evaluated, as have a variety of other environmental and health effects. Other parts of the country
8 such as the Mississippi Valley would show a very different pattern of cost damages with terrestrial and
9 freshwater emissions causing proportionally higher damage costs, and emissions to the atmosphere
10 causing a lower percentage of damages. But those very differences would assist EPA and the generators
11 of those emissions in setting priorities for mitigation.

12 As these multiple metrics indicate, decisions about which fluxes of Nr to mitigate depend upon which
13 metric is utilized. The cascading economic costs of damage highlight the importance of regulating air
14 emissions because of their impacts on human health as well as their large contribution to the degradation
15 of Chesapeake Bay water quality. Hence, if one is interested in reducing water impacts of Nr, the total
16 reduction of damage may rely nearly as much on stricter enforcement of the CAA as the CWA. This
17 challenges our traditional approach to regulation, but that is a consequence of comprehensively
18 examining Nr guided by the nitrogen cascade.

1 **2.4.3 Reactive nitrogen and aquatic ecosystems**

2 *2.4.3.1 Impacts of Nr on aquatic systems*

3 The availability of N controls primary production in much of the world's estuarine, near-shore coastal
4 and open ocean waters (Dugdale 1967, Ryther and Dunstan 1971, Nixon 1995, Paerl 1997; Boesch et al.
5 2001). Nitrogen can also play a role as either a primary or secondary limiting nutrient in freshwater
6 environments, especially large lakes (e.g. L. Tahoe, L. Superior). As such, the fertility of these waters is
7 often closely controlled by N inputs, which are provided either internally by regeneration of pre-existing
8 N and biologically-fixed atmospheric N₂, or supplied externally (i.e. "new" N) as combined N sources
9 delivered via surface runoff, sub-surface groundwater or atmospheric deposition.

10 The extent to which accelerated N loading promotes eutrophication and its symptoms varies greatly
11 among marine ecosystems. Receiving waters exhibit variable sensitivities to N and other nutrient
12 [phosphorus (P), iron (Fe), and silica (Si)] loads that are controlled by their size, hydrologic properties
13 (e.g. flushing rates and residence times), morphologies (depth, volume), vertical mixing characteristics,
14 geographic and climatic regimes and conditions. In addition, the magnitude and distribution of N in
15 relation to other nutrient loads can vary substantially. In waters receiving very high N loads relative to
16 requirements for sustaining primary and secondary production, other nutrient limitations may develop.
17 This appears to be the case in coastal waters downstream of rivers draining agricultural regions that are
18 enriched in N.

19 On the ecosystem level, estuarine and coastal waters exhibit individualistic responses to N loads over
20 seasonal and longer (multi-annual, decadal) time scales. The degree to which these systems are exposed
21 to freshwater discharge, tidal exchange and vertical mixing is critical for determining how they respond
22 to specific N loads (Vollenweider et al., 1992, Nixon 1995, Cloern 1999, 2001; Valdes-Weaver et al.
23 2006; Paerl et al. 2007). Another variable is the manner in which N loading takes place, which may
24 range from acute pulsed events such as storms and associated flooding, to longer-term gradual (chronic)
25 increases in N loading associated with more predictive seasonal, annual and inter-annual hydrologic
26 cycles. There are striking contrasts in ecosystem response to N inputs that reflect a range in physical
27 (hydrodynamic, optical) and climatic conditions (Cloern 1999, 2001). Examples include contrasts
28 between strong tidally-driven estuarine systems, such as Delaware Bay and San Francisco Bay, and non-
29 tidal, lagoonal systems, such as North Carolina's Pamlico Sound and Texas's Laguna Madre, or semi
30 enclosed coastal systems, such as Florida Bay and the Long Island Sound (Bricker et al., 1999; Valdes-
31 Weaver et al. 2006; Paerl et al. 2007).

32 Externally-supplied N comes in various forms, including organic N and inorganic reduced (NH₃ and
33 NH₄⁺ ion) and oxidized (NO₃⁻) N, all of which are potentially available to support new production and
34 eutrophication. Laboratory experiments on phytoplankton isolates and bioassays with natural
35 phytoplankton communities have indicated that these contrasting forms may be differentially and
36 preferentially utilized, indicating that, depending on composition of the affected phytoplankton
37 community, some forms are more reactive than others (Collos, 1989; Stolte et al., 1994; Riegman,
38 1998). Phytoplankton community composition can also be altered by varying proportions and supply

1 rates of different forms of N (Dortch, 1990; Stolte et al., 1994; Harrington, 1999; Pinckney et al., 1999;
2 Piehler et al., 2002). Monitoring and research on dissolved organic N inputs and their effects should be
3 conducted in receiving streams, rivers, lakes, estuarine and coastal waters, since there is evidence that
4 these compounds can be utilized by phytoplankton, including harmful bloom species (Paerl 1988, Antia
5 et al. 1991, Carlsson and Granéli 1998, Gilbert et al. 2006). In addition, specific N compounds may
6 interact with light availability, hydrodynamics and other nutrients, most notably P, Si, Fe, and trace
7 metals, to influence phytoplankton community growth rates and composition (Harrison & Turpin, 1982;
8 Smith, 1990, Dortch & Whitedge, 1992).

9 One example of shifting N inputs is the proliferation of intensive livestock operations in coastal
10 watersheds, which has led to large increases and changes in chemical composition of nitrogenous
11 compounds discharged to estuarine and coastal waters via runoff, groundwater and atmospheric
12 deposition (Paerl, 1997; Howarth, 1998; Galloway & Cowling, 2002). In general, coastal waters under
13 the influence of these operations are experiencing increases in total N loading as well as a shift toward
14 more reduced N (NH_4^+ , organic N) relative to oxidized N (NO_3^-) (Howarth et al., 2002; Galloway &
15 Cowling, 2002). These increases, combined with increases in hypoxia and anoxia in receiving waters,
16 are leading to more NH_4^+ -rich conditions, which will favor algal groups able to best exploit this N form,
17 including some harmful algal bloom (HAB) taxa (Paerl and Whitall 1999; Paerl et al. 2007). Similarly,
18 conversion of forest and agricultural lands to urban lands can alter landscapes and promote N loading to
19 estuaries by increasing impervious pathways and removing natural landscape filters for N.
20 Development also destroys and eliminates wetlands, leading to more NO_3^- -enriched conditions,
21 potentially favoring plant taxa best able to exploit this N form.

22 *2.4.3.2 Water quality regulation and management*

23 Section 303 of the CWA requires states to adopt water quality standards and criteria that meet the state-
24 identified designated uses (e.g., uses related to “fishable”, “swimmable”) for each waterbody.
25 Specifically, “A water quality standard defines the water quality goals of a water body, or portion
26 thereof, by designating the use or uses to be made of the water and by setting criteria necessary to
27 protect the uses.” (40 CFR Sec. 131.2). Further, “Such standards serve the dual purposes of establishing
28 the water quality goals for a specific water body and serve as the regulatory basis for the establishment
29 of water-quality-based treatment controls and strategies beyond the technology-based levels of treatment
30 required by sections 301(b) and 306 of the Act.” (40 CFR Sec. 131.2).

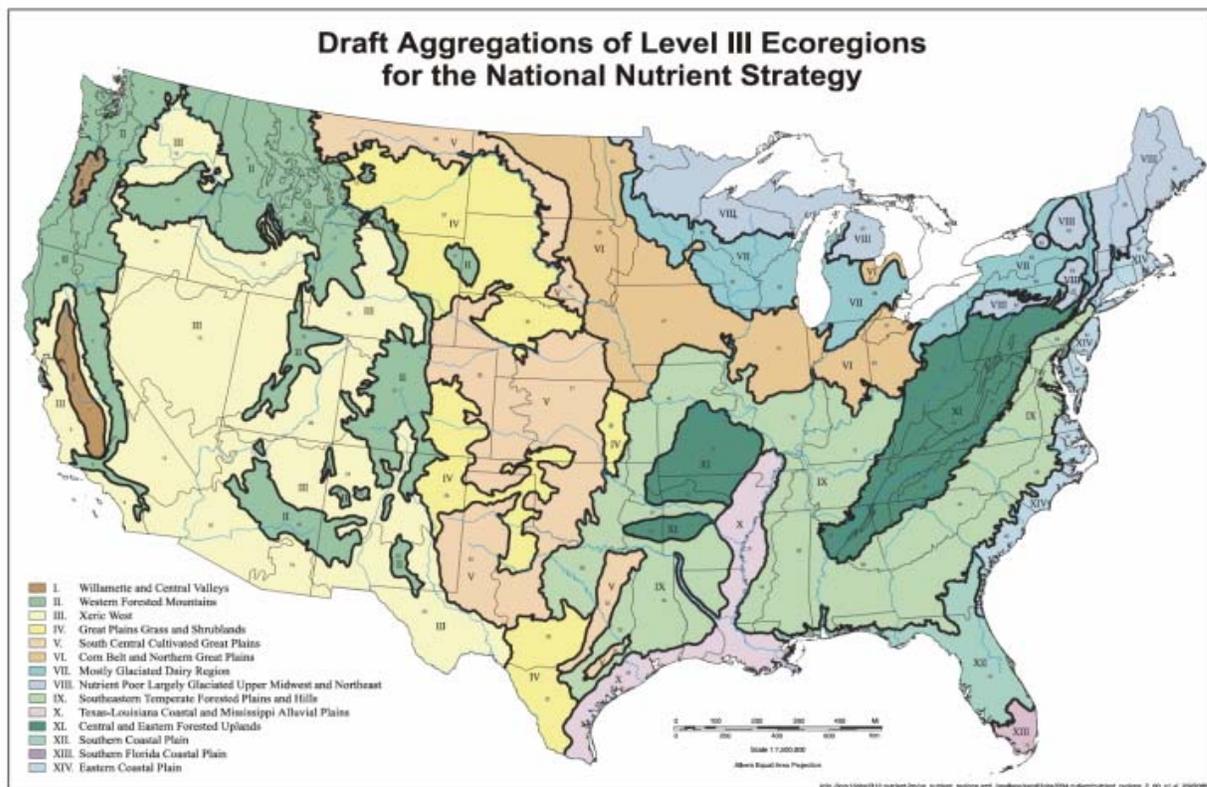
31 The EPA sets minimum requirements for approvable standards and criteria including: use designations;
32 water quality criteria sufficient to protect the designated uses; and an antidegradation policy (40 CFR
33 Sec. 131.6). Traditionally, N and other land, air and water pollutants are measured in terms of quantity
34 (mass) released per unit time (e.g., kg/day) or as a concentration (e.g., milligrams per liter, hereafter
35 ml/L). Therefore, regulations often specify mass loading limits or maximum concentrations in permits.

36 In the mid-to-late 1990s, EPA began to emphasize the development of numeric nutrient criteria for both
37 P and N through the state standards-setting process because, according to the 1996 Water Quality Report
38 to Congress (EPA 1997), 40% of the rivers, 51% of the lakes and ponds, and 57% of the estuaries

1 assessed for the report were exhibiting a nutrient-related impairment. Few states had adopted numeric
2 nutrient criteria for all affected waterbodies, especially for N, often relying on narrative criteria or
3 secondary effects such as chlorophyll-a concentration, dissolved O₂, or water clarity. EPA's strategy,
4 driven by President Clinton's Clean Water Action Plan (EPA, 1998) mandated numeric nutrient criteria
5 to begin to address the problem (EPA 1999). To move the objectives of the Clean Water Action Plan
6 forward, EPA published national nutrient criteria guidance for lakes and reservoirs (EPA 2000b), rivers
7 and streams (EPA 2000c), estuaries and coastal waters (EPA 2001c), and wetlands (EPA 2007e), and
8 ecoregional guidance for lakes and reservoirs and rivers and streams (Figure 21). To date, relatively few
9 states have adopted new numeric criteria into their water quality standards. While some successes are
10 evident in promulgating P criteria for freshwater systems, which has a richer history of numeric criteria
11 incorporation into state water quality standards, development of numeric nitrogen criteria has been
12 elusive for a variety of reasons.

13 Multimedia and multijurisdictional N management can be complicated because the CWA has little
14 authority over atmospheric sources, and individual states explicitly lack authority to control upstream
15 sources. Quite often in estuaries such as the Gulf of Mexico or Chesapeake Bay, management goals that
16 meet water quality standards cannot be attained without interstate compacts or a strong federal role that
17 may be resisted by upstream states that may have to bear the cost but do not necessarily reap the benefits
18 of the water quality improvement. Such a dilemma underscores the need for an integrated approach to
19 N_r management.

1 **Figure 21: Fourteen nutrient ecoregions as delineated by Rohm et al., 2002**
2 Ecoregions were based on geology, land use, ecosystem type, and nutrient condition, including
3 economic and ecosystem services.



4

1

2 *2.4.3.3 Aquatic thresholds for Nr*

3 In aquatic ecosystems, thresholds at which excess Nr becomes a problem can be expressed as a
4 management goal such as a total maximum daily load (TMDL) or as a critical load (CL). Under the
5 authority of the CWA, EPA has developed guidance for establishing numeric nutrient criteria on an eco-
6 regional basis (Figure 22) for lakes and reservoirs, streams and rivers, estuaries and coastal waters, and
7 wetlands. EPA has proposed specific numbers for lakes and reservoirs and rivers and streams (Table
8 19), and protocols for developing criteria for estuaries and wetlands. Each state is advised to go through
9 an assessment to determine the best methodology for implementing numeric criteria (EPA 2000b;
10 2000c; 2001c; and 2007e). These criteria will identify impaired waterbodies for which TMDLs may be
11 required.

12 The second type of threshold available for aquatic ecosystems is the critical load (CL). Unlike the
13 TMDL, the CL (in the US) has no regulatory framework but rather sets the threshold of Nr loading at
14 which negative impacts have been documented. Based extensively on European work CLs for aquatic
15 ecosystems are Nr inputs on the order of 2-15 kg N/ha/yr (Bobbink et al., 2009). There are numerous
16 locations within the U.S. where deposition to surface waters falls within this range.

17 *2.4.3.4 Water management in urbanized areas*

18 Populated (urban/suburban/developed) land areas provide significant loads of Nr to the environment,
19 both by generation (e.g., deposition of NO_x emissions) and by transfer (e.g., domestic sewage from
20 imported food). Categorical sources include sewage treatment plants (STPs), industries, subsurface
21 (septic) systems, atmospheric deposition, domestic animal and wildlife waste, and fertilizers used on
22 lawns, gardens and landscapes. Infrastructure (e.g., storm sewers) and landscape conditions (e.g.,
23 increased impervious cover) more efficiently move Nr associated with surface runoff to receiving waters
24 and may also inject or infiltrate Nr into ground water. Landscape changes, primarily increases in
25 impervious cover, soil disturbance and compaction, and wetland/hydric soil losses, have also reduced
26 the capacity for natural systems to treat Nr inputs by recycling or denitrification. Other disruptions in
27 chemical condition (e.g., acidification), biology (e.g., vegetative cover), and physical character (e.g.,
28 temperature increase) alter the nitrogen cascade, which may have both negative and positive
29 consequences for Nr amelioration on the populated landscape and in air and water. Populated lands are
30 estimated to export as much as 10 times the total nitrogen that was exported under pre-development
31 conditions.

32 **Finding 13**

33 Intervention to control Nr under most water management programs generally occurs in three ways:

- 34
- Prevention or source controls

- 1 • Physical, chemical or biological “dead ending” or storage within landscape compartments where it is
2 rendered less harmful (e.g., long-term storage in soils or vegetation; denitrification, primarily in
3 wetlands; reuse)
- 4 • Treatment using engineered systems such as wastewater treatment plants or BMPs for stormwater
5 and nonpoint source runoff.

6 While most management programs focus on the third (treatment) approach, there are opportunities for
7 combining the three that can be more effective and cost less.

8 **Recommendation 13.** *To better address Nr runoff and discharges from the peopled landscape the*
9 *committee recommends that EPA:*

10 **13a.** *Evaluate the suite of regulatory and non regulatory tools used to manage Nr in populated*
11 *areas from nonpoint sources, stormwater and domestic sewage and industrial wastewater treatment*
12 *facilities, including goal-setting through water quality standards and criteria. Determine the most*
13 *effective regulatory and voluntary mechanisms to apply to each source type with special attention to*
14 *the need to regulate nonpoint source and related land use practices.*

15 **13b.** *Review current regulatory practices for point sources, including both wastewater treatment*
16 *plants and stormwater, to determine adequacy and capacity towards meeting national Nr*
17 *management goals. Consider technology limitations, multiple pollutant benefits, and funding*
18 *mechanisms as well as potential impacts on climate change from energy use and greenhouse gas*
19 *emissions, including nitrous oxide.*

20 **13c.** *Set Nr management goals on a regional/local basis, as appropriate, to ensure most effective use*
21 *of limited management dollars. Fully consider “green” management practices such as low impact*
22 *development and conservation measures that preserve or re-establish Nr removing features to the*
23 *landscape as part of an integrated management strategy along with traditional engineered best*
24 *management practices.*

25 **13d.** *Research best management practices that are effective in controlling Nr, especially for*
26 *nonpoint and stormwater sources, including land and landscape feature preservation and set Nr*
27 *management targets that realistically reflect these management and preservation capacities.*
28 *Construct a decision framework to assess and determine implementation actions consistent with*
29 *management goals.*

30 **13e.** *Use ecosystem-based management approaches that balance natural and anthropogenic needs*
31 *and presence in the landscape.*

32 2.4.3.5 Attainment of water quality management goals and standards

33 Estuarine systems, where bio-available Nr is more likely to be the limiting nutrient, are most often
34 susceptible to Nr enrichment (Paerl 1997; Boesch et al. 2001). Defining single number criteria for
35 nutrients or related indicators representative of undesirable levels of productivity (e.g., chlorophyll *a*) is
36 difficult, even using the ecoregional approach recommended by EPA. State managers more often use
37 the formal TMDL process or collaborative estuarine management plans to set site- or estuary- specific N

1 management targets to meet existing, related water quality criteria (e.g., dissolved O₂ or chlorophyll *a*).
 2 Some of the more prominent efforts and targets for nitrogen control are summarized in Table 18.

3 **Table 18: Estuaries with nitrogen management plans or TMDLs and target levels**

Estuary	Nitrogen Management Target	TMDL or Plan
Casco Bay, Maine	45%	Plan
Chesapeake Bay	>40%	Plan
Northern Gulf of Mexico Mississippi Plume Region	45%	Plan
Long Island Sound	60% for CT & NY sources	TMDL
Neuse River Estuary, NC	30%	?
Tampa Bay, FL	Maintain TN load at 1992-1994 levels	TMDL & Plan

4
 5 These targets all exceed the national estimates for nitrogen load reductions the INC has identified in this
 6 report, which are generally less than 25% from specific source categories. Since not all sources offer
 7 management opportunities, the expectation is that Nr loadings to estuaries would cumulatively be less
 8 than 25%, which is below the targets identified in Table 23. Many of the management actions the
 9 committee has proposed would also require substantive changes in national programs, regulatory
 10 authority, management technologies and societal demands to be accomplished. This is a nutrient
 11 management concern state managers are well aware of as they develop TMDLs and management plans
 12 that range above attainment potential, not only for Nr but more frequently for other pollutants that are
 13 predominately nonpoint source and stormwater loaded (including atmospheric source contributions).

14 The Chesapeake Bay Program, for example, is a model for Nr and P management in many ways.
 15 Considerable resources were committed, and many BMPs) implemented, with disproportionate results.
 16 Despite regional efforts and commitments from all watershed states, and more funding than any other
 17 estuary program is likely to see, they are falling short of management targets and are coming off a
 18 discouraging year (2007) that saw a severe hypoxic episode. Similarly, the adoption of the Long Island
 19 Sound TMDL (See Long Island Sound Text Box) sets an implementation plan that could attain
 20 Connecticut and New York dissolved oxygen criteria, but only if “alternative technologies” such as
 21 mechanical aeration of the Sound or biological harvesting of nutrients, are used.

22 **Finding 14**

23 Meeting Nr management goals for estuaries, when a balance must be struck between economic, societal
 24 and environmental needs, under current federal law seems unlikely. Enforceable authorities over

1 nonpoint source, stormwater, air (in terms of critical loads), and land use are not adequate to support
2 necessary Nr controls. Funding programs are presently inadequate to meet existing pollution control
3 needs. Furthermore, new technologies and management approaches are required to meet ambitious Nr
4 control needs aimed at restoring national water quality.

5 **Recommendation 14.** *INC recommends that EPA reevaluate water quality management approaches to*
6 *ensure Nr management goals are attainable, enforceable, and affordable and that monitoring and*
7 *research are adequate to problem definition and resolution, particularly in the development of nitrogen*
8 *removal technologies. This may require changes in the way EPA sets water quality criteria and some*
9 *compromises in ecosystem goals to accommodate human uses of the air, land and water.*

10 **Text Box 3: Long Island Sound Total Maximum Daily Load (TMDL)**

11 A TMDL sets a goal for reducing the load of a specific pollutant that is causing impairment to a
12 waterbody. In the case of Long Island Sound, the impairment constitutes low concentrations of
13 dissolved O₂ that violate both Connecticut's and New York's water quality standards. Nitrogen has
14 been identified as the pollutant that causes substandard levels of dissolved sewage treatment plants (STP
15 in Long Island Sound and, accordingly, Connecticut's and New York's environmental agencies have
16 developed a TMDL that assigns nitrogen reductions from both point sources (the wasteload allocation or
17 WLA) and nonpoint sources (the load allocation or LA) in their respective states to meet the established
18 58.5% reduction of anthropogenic sources.

19 The Long Island Sound TMDL is set at 23,966 tons of N/year, which represents a 23,834
20 ton/year reduction from the total baseline (anthropogenic + natural sources considered) of 47,788
21 tons/year from Connecticut and New York only. Most of that N load comes from point sources –
22 POTWs (publicly owned treatment works) and CSOs (combined sewer overflows) – accounting for
23 38,899 tons/yr of the total N load from the two states, or 81% of the load. For that reason, the focus has
24 been on managing point sources, although attainment of water quality standards will require more
25 widespread reductions from atmospheric deposition, stormwater and nonpoint sources, and from other
26 watershed states north of Connecticut.

27 Connecticut and New York have some flexibility in the apportionment of those reductions
28 between the WLA and the LA, but must have completed 40% of the required reductions by 2004, 75%
29 by 2009 and 100% by 2014 when the final TMDL will be met. However, the TMDL is presently
30 undergoing revision to incorporate findings from a new model of Long Island Sound, and to reflect
31 changes in dissolved O₂ criteria in both states. The revised TMDL will likely require more aggressive
32 reductions of nitrogen to meet dissolved O₂ criteria and may formalize targets for upstream state
33 contributions and atmospheric deposition.

34

35 2.4.3.6 Water quality monitoring and assessment

1 Under Sec. 106 of the CWA, the EPA provides funds to assist state and interstate agencies and tribes to
2 conduct monitoring of the nation's waters to ensure adopted water quality criteria, and designated uses,
3 are met. Further, primarily under Sec. 305(b) of the CWA, those entities are required to report, on a
4 biennial basis, on the health and status of their jurisdictional waters. These assessments are presented by
5 the states to the EPA to categorize attainment of designated uses. EPA has published these reports up
6 until 1998 (EPA 2000a), after which it transitioned into a Water Quality Report in 2000 (EPA 2002) and
7 a National Assessment Database in 2002 (<http://www.epa.gov/waters/305b/index.html>). States also
8 prepare a list of "impaired" waters under Sec. 303(d) of the CWA (EPA, 1999). Subsequent reports will
9 provide a synthesis of CWA Sec. 305(b) and 303(d) reporting under a Consolidated Assessment and
10 Listing Methodology or "CALM" approach.

11 The EPA compiles the approved state 303(d) lists into a national listing
12 (http://iaspub.epa.gov/waters/national_rept.control). The list provides information by state as well as by
13 impairment cause, and identifies the TMDLs completed to date. The most current data available on the
14 EPA Web site includes reporting from most entities through 2004. The report identifies 5,617
15 impairments related to "nutrients" (almost 9% of all identified impairments), although other
16 impairments may ultimately have a nutrient enrichment cause. For example, oxygen depletion (4,540),
17 turbidity (2,050), algal growth (510), ammonia (generally toxicity – 416), and HABS (4) can all have a
18 common cause such as N or P enrichment. It should also be clear that impairments may have multiple
19 causes so, for example, waters identified as impaired by O₂ depletion may also be impaired by nutrients.

20 There are other initiatives promoted by EPA to monitor and assess the nation's waters, generally
21 implemented in collaboration with, or by, the state and interstate agencies and tribes having jurisdiction
22 over the waters. These include the Wadeable Stream Assessment (WSA) (EPA 2006a), the National
23 Coastal Assessment (NCA) and its National Coastal Condition Reports (EPA 2001a, 2004, and 2006b),
24 the Survey of the Nation's Lakes and Survey of the Nation's Rivers and Streams, and, more recently,
25 probabilistic monitoring efforts in lakes, streams and estuaries
26 (<http://www.epa.gov/owow/monitoring/reporting.html>). Many of these are aimed at including a
27 biological assessment component that is often lacking in water pollutant and chemistry efforts described
28 above.

29 The National Oceanic and Atmospheric Administration has periodically produced estuarine assessments
30 under the National Estuarine Eutrophication Assessment (NEEA) program. The most recent report was
31 released in 2007 (Bricker et al., 2007). The report has a focus on nutrient enrichment and its
32 manifestations in the estuarine environment and relies on participation and interviews of local experts to
33 provide data for the assessment. Among the key findings were:

- 34 • Eutrophication is a widespread problem, with the majority of assessed estuaries showing
35 signs of eutrophication—65% of the assessed systems, representing 78% of assessed
36 estuarine area, had moderate to high overall eutrophic conditions.
- 37 • The most common symptoms of eutrophication were high spatial coverage and frequency
38 of elevated chlorophyll *a* (phytoplankton)—50% of the assessed estuaries, representing
39 72% of assessed area, had excessive chlorophyll *a* ratings.

1

2 **Finding 15**

3 The committee has determined that an integrated approach to monitoring that includes
4 multimedia (air, land and water) components and considers a suite of environmental and human
5 concerns (e.g., Nr effects, climate change, human health) would be most useful and efficient.
6 Some of the phenomena that we present in this report simply need more definition and
7 verification but, more importantly, as control is brought to bear on Nr, improvements need to be
8 measured (i.e. monitored) to validate the success of one control or another. If the desired
9 improvements are not realized as shown by the collected data, corrective measures will be
10 required. The pool of data would be used to formulate new management procedures. The
11 process of monitoring and control revisions is termed adaptive management—a process that INC
12 supports as it does not delay actions that can be taken immediately, but acknowledges the
13 likelihood that management programs will be altered (adapted) as scientific and management
14 understanding improve.

15

16 **Recommendation 15.** *The committee recommends that EPA initiate discussions and take action*
17 *to develop a national, multimedia monitoring program that monitors sources, transport and*
18 *transition, effects using indicators where possible, and sinks of Nr in keeping with the nitrogen*
19 *cascade concept. This comprehensive program should build upon existing EPA and state*
20 *initiatives as well as monitoring networks already underway in other federal agencies such as*
21 *the U.S. Geological Survey programs and the NADP effort.*

22

23 **2.4.4 Reactive nitrogen and air quality**

24 *2.4.4.1 Impacts of Nr on atmospheric systems*

25 The atmosphere is 78% N, mostly N₂, with just trace amount of Nr. The former has a long residence
26 time (millions of years) and has no negative impact on ecosystems or humans. With one exception, the
27 N species that constitute Nr (see footnote in the Executive Summary and Chapter 2) have residence
28 times of less than a year (many on the order of days), and contribute to all the negative impacts
29 associated with excess Nr in the atmosphere. In addition, the exception (N₂O), with a residence time of
30 over a century, also contributes to negative impacts on ecosystems and humans.

31 The atmosphere receives Nr mainly as air emissions of NO_x, NH₃, and N₂O from aquatic and terrestrial
32 ecosystems and of NO_x from combustion of biomass or fossil fuels. Once emitted NO_x can be
33 transformed into a variety of oxidized N species. Ultimately much of the NO_x is converted to HNO₃,
34 which is either converted to an aerosol (e.g., ammonium nitrate) or deposited on land, surface waters, or
35 other surfaces. NH₃ emitted to the atmosphere is either deposited or transformed into an ammonium
36 aerosol (e.g., ammonium bisulfate or ammonium sulfate). Before deposition, NH₄⁺ aerosols contribute
37 to fine particulate matter and regional haze concentrations in the atmosphere. Due to the short residence
38 time of NO_x, NH₃ and their reaction products, can only accumulate in the troposphere on a regional
39 scale. Almost all Nr emitted as NO_x and NH₃ is transferred back to Earth's surface within hours to days.

1 Six major atmospheric effects are associated with increased NO_x and NH₃ emissions, and two with N₂O
2 emissions (Galloway et al., 2003). For NO_x and NH₃ emissions they are: (1) fine PM decreases
3 atmospheric visibility; (2) elevated ozone concentrations enhance the greenhouse potential of the
4 atmosphere; (3) ozone and fine particulate matter have serious impacts on human health (Brunekreef et
5 al. 2005, Brook et al. 2003; Pope 2000a, 2000b Pope et al. 1995, Pope 2009); (4) NH₃ plays an important
6 role in the direct and indirect effects of aerosols on radiative forcing and thus on global climate change
7 (Seinfeld and Pandis 1998, Penner et al. 2001; Lelieveld et al. 2001); (5) ozone deposition can decrease
8 productivity of crops, forests, and natural ecosystems; and (6) atmospheric deposition of NH₃, NO_y,
9 and organic forms of Nr can contribute to ecosystem acidification, fertilization, and eutrophication. For
10 N₂O they are: (1) the greenhouse effect in the troposphere and, (2) O₃ depletion in the stratosphere.

11 *2.4.4.2 Clean Air Act and air quality regulation and management*

12 The modern history of American air pollution control legislation begins with the 1963 Clean Air Act
13 (CAA) which, along with its amendments, requires the EPA to establish and revise National Ambient
14 Air Quality Standards (NAAQS's) and to prepare state of the science reviews such as the Criteria
15 Documents and more recently the Integrated Science Assessments (ISA) [EPA 2004, 2006, 2007].
16 There are six criteria pollutants, carbon monoxide, lead, NO₂, ozone, SO₂, and PM. These have been
17 determined to endanger public health or welfare. The CAA as currently written requires a review of the
18 scientific criteria for these standards at five-year intervals. Although NO₂ is the only Nr compound
19 specified as a criteria pollutant, NH_x and NO_y play a major role in formation of the secondary pollutants
20 ozone and particulate matter.

21 The CAA has been amended several times since its inception. In 1970, the CAA was amended "to
22 provide for a more effective program to improve the quality of the nation's air." The CAA was again
23 amended again in 1977, primarily to mandate reductions of emissions from automobiles. Despite
24 evidence that NO_x is the central pollutant in photochemical smog formation [Chameides and Walker,
25 1973; Crutzen, 1973; 1974; Fishman and Crutzen, 1978; Fishman, et al., 1979] federal regulations did
26 not require automobiles to control NO_x emissions to below 1 g/mi (0.14 g N per km³) until 1981. Few
27 locales violate the standards for NO₂, but the secondary effects of several these gases are also pose
28 health and welfare concerns. If a city had an annual average NO₂ level anywhere near the NAAQS for
29 NO₂, it would risk severe photochemical smog – the summertime efficiency for ozone production ranges
30 from 4 to 10 ppb O₃ per ppb NO_x.

31 The focus on compliance monitoring for NO₂ ignores the other, equally important members of the NO_y
32 family such as HNO₃ that deposits quickly onto the Earth's surface. It is clear that a causal relationship
33 between current levels of N and S deposition and numerous biologically adverse effects on ecosystems
34 across the U.S. exists (EPA 2008). "Conversion of the existing network of NO_x monitors to NO_y
35 monitors with a detection limit of 0.1 ppb would still demonstrate compliance with the NO₂ standard but
36 greatly increase the utility of the measurements for model evaluation as well as for understanding nitrate
37 deposition and formation of photochemical smog, and haze.

1 Air pollution, especially ozone and PM, continued to be a problem in many American cities and the
2 CAA was again amended in 1990. The Nr-relevant aspects were aimed at controlling urban smog and
3 acid deposition. States were required to develop emissions inventories for reactive organic compounds,
4 carbon monoxide, and NO_x, but not NH₃ or N₂O. Over the US, sulfate and nitrate are responsible for
5 about 2/3 and 1/3 respectively of the direct deposition of acids. The CAA Amendment of 1990 required
6 emissions decreases of 10 million tons of SO₂ and 2 million tons of NO_x relative to 1980 levels.
7 Ammonia and ammonium, although they contribute to acidity after entering terrestrial ecosystems
8 [Galloway, et al., 2003; NRC, 2003] and are expected to play an increasing role [Pinder et al., 2008]
9 were not regulated by this legislation.

10 The 1997 revision of the CAA changed the standards for ozone and PM (see Table 3-23). A sizable
11 fraction of the mass of PM less than 2.5 microns, PM_{2.5}, is condensed Nr. As stated above, these
12 particles have adverse health consequences. PM is also controlled by the Regional Haze Regulations.
13 By the year 2064, states must restore Class I areas to their natural levels of atmospheric clarity. (EPA
14 2004).

15 Ozone and PM, the two most recalcitrant of the criteria pollutants, cover large spatial scales. These
16 secondary pollutants are not released at the tailpipe; rather they form in the atmosphere. Violations are
17 declared on urban scales, responsibility for their control was assigned to States, but the physics and
18 chemistry of smog and haze are regional. In the eastern US, ozone episodes often cover several states
19 and involve pollutants emitted in upwind states that do not themselves experience violations [Chen, et
20 al., 2003; Husar, et al., 1977; Logan, 1989; Moy, et al., 1994; Ryan, et al., 1998]. The 1990
21 amendments to the Clean Air Act established, in part as a response to this scaling problem, the Ozone
22 Transport Assessment Group (OTAG) and the Ozone Transport Commission (OTC). These have
23 jurisdiction extending from Washington, DC to Maine. Progress has been made on regional control of
24 emissions; the NO_x SIP call, implemented in 2003 and 2004, has led to measurable improvements in
25 ambient ozone and nitrate levels [Gego, et al., 2007; Sickles and Shadwick, 2007]. Experiences with
26 ozone and PM provide a useful demonstration of why it is necessary to develop an integrated approach
27 to management of Nr.

1 **Table 19: Federal primary ambient air quality standards that involve Nr, effective January 2008.**
 2 **Secondary standards are currently identical to the primary standards**

Pollutant	Federal Primary Standard (NAAQS)
Ozone (O₃)	
1-hr average	0.12 ppmv
8-hr average	0.08 ppmv
Nitrogen Dioxide (NO₂)	
Annual average	0.053 ppmv (100 µg m ⁻³)
Particulate Matter, coarse (PM₁₀)	
Diameter ≤ 10 µm, 24-hr average	150 µg m ⁻³
Annual average	50 µg m ⁻³
Particulate Matter, fine (PM_{2.5})	
Diameter ≤ 2.5 µm, 24-hr average	35 µg m ⁻³
Annual average	15 µg m ⁻³

3

4 *2.4.4.3. Atmospheric thresholds for Nr*

5 As shown in Table 19 the metric used for safe, upper limits in the atmospheric environment is
 6 concentration (in mass per unit volume of air or volume mixing ratios) averaged for a given time period,
 7 usually 1 hr, 8 hr, 24 hr, or annually. The thresholds for excess Nr in the atmosphere remain an area of
 8 active research. The only Nr compound for which there is currently a NAAQS is NO₂, which may not
 9 exceed 0.053 ppm (100 ug/m³) for the annual arithmetic mean. This standard, based on the direct health
 10 effects, is certainly inadequate because NO₂ concentrations well below 0.053 ppm lead to concentrations
 11 of secondary pollutants well above acceptable levels (i.e., PM_{2.5} and O₃). The NO₂ concentration
 12 required to achieve the current 75 ppb ozone standard has not been rigorously established, but it must be
 13 well below 0.053 ppm, because areas currently in violation of the ozone standard typically have NO₂
 14 concentrations below 0.020 ppm (<http://www.epa.gov/air/airtrends/nitrogen.html>). The NO₂
 15 concentration required to achieve the current 15 ug/m³ PM_{2.5} standard is probably also below the 100
 16 ug/m³ standard for NO₂ because of the role of NO₂ in secondary particulate formation.

1 The INC is recommending that NO_x emissions be decreased by 2 Tg N/yr, relative to the baseline level
2 in 2002. Emissions decreases implemented since 2002 have already substantially improved [Gégo, *et*
3 *al.*, 2007] ozone concentrations. The absolute amount of decrease and the positive impact it would have
4 on human health is region dependent, but further decreases will result in further beneficial decreases in
5 PM_{2.5} and O₃ concentrations.

6 The threshold for total Nr in the atmosphere are yet to be fixed, but depends on its rate of deposition to
7 the surface and the sensitivity of the receptor(s). The immediate need for determining thresholds for
8 atmospheric Nr is monitoring of NO_y and NH_x.

9 **2.4.5 Reactive Nitrogen and terrestrial ecosystems**

10 *2.4.5.1 Impacts of Nr on terrestrial ecosystems*

11 In many terrestrial ecosystems the supply of biologically available Nr is a key factor controlling the
12 nature and diversity of plant life, and vital ecological processes such as plant productivity and the
13 cycling of carbon and soil minerals. Human activities have not only increased the supply but enhanced
14 the global movement of various forms of nitrogen through air and water.

15 The primary source of excess Nr for most unmanaged terrestrial ecosystems is atmospheric deposition.
16 This additional Nr causes a wide variety of sometimes beneficial effects (increased growth and
17 productivity of forests, natural grasslands, and crops planted in nutrient deficient soils) and also
18 sometimes adverse effects on terrestrial and aquatic ecosystems in many parts of our country. Forests
19 and grasslands exposed to excess Nr can respond in numerous ways. General effects include the
20 following (Cowling, 1989, Cowling et al. 1990, Cowling et al. 2002, Garner et al.1989, Woodman and
21 Cowling1987; Vitousek et al., 1997):

- 22 1. Increased productivity of forests soils most of which are Nr-limited throughout the US,
23 Nr deficiency of forest soils has been most fully quantified for pine forests in 14
24 southeastern states
- 25 2. Acidification of forest soils leading to decreased availability of nutrient cations including
26 calcium, magnesium, and potassium and aluminum toxicity, established most clearly in
27 the eastern U.S. and both central and northern Europe
- 28 3. Nr saturation of forest soils, presently occurring mainly in high-elevation forests of the
29 eastern U.S. and southeastern Canada
- 30 4. Ozone-induced predisposition of forest trees to damage by fungal diseases and insect
31 pests, most clearly established in the case of root disease and bark beetles in the pine
32 forests of southern California
- 33 5. Ozone-induced inhibition of photosynthesis in both softwood and hardwood tree species
34 most clearly established in controlled exposure studies in both the U.S. and Europe at
35 ambient concentrations of ozone above 60 ppb. Such concentrations occur frequently
36 throughout the eastern U.S. and southeastern Canada
- 37 6. Ozone induced direct injury to foliage, most clearly established in the case of “emergence
38 tip burn” in eastern white pine
- 39 7. Acidification induced decrease in frost hardiness of high-elevation conifer forests, most
40 clearly established in the case of red spruce in the northeastern US

- 1 8. Acidification induced alteration of beneficial symbiotic relationships in forest soils,
2 especially mycorrhizae, most clearly established in both northern and central Europe
- 3 9. Biodiversity losses in natural grasslands and forest areas caused by Nr induced decreases
4 in abundance of Nr-limited tree and grass species and replacement by Nr-loving weed
5 species, most clearly established in both Minnesota and California, and even more vividly
6 in The Netherlands
- 7 10. Decreases in visibility and increased haziness of the atmosphere at scenic vistas in
8 national and state parks and wilderness areas
- 9 11. More leaching of Nr to aquatic systems via both groundwater and surface runoff – a
10 cascade effect
11

12 *2.4.5.2 Nr saturation and ecosystem function*

13 There are limits to how much plant growth can be increased by N fertilization. At some point, when the
14 natural N deficiencies in an ecosystem are fully relieved, plant growth becomes limited by availability of
15 other resources such as phosphorus, calcium, or water and the vegetation can no longer respond to
16 further additions of Nr. In theory, when an ecosystem is fully Nr-saturated and its soils, plants, and
17 microbes cannot use or retain any more, all new Nr deposits will be dispersed to streams, groundwater,
18 and the atmosphere. Nr saturation has a number of damaging consequences for the health and
19 functioning of ecosystems. These impacts first became apparent in Europe almost three decades ago
20 when scientists observed significant increases in nitrate concentrations in some lakes and streams and
21 also extensive yellowing and loss of needles in spruce and other conifer forests subjected to heavy Nr
22 deposition. In soils, most notably forest soils because of their natural low pH, as NH_4^+ builds up it is
23 converted to nitrate by bacterial action, a process that releases hydrogen ions and contributes to soil
24 acidification. The buildup of NO_3^- enhances emissions of nitrous oxides from the soil and also
25 encourages leaching of highly water-soluble NO_3^- into streams or groundwater. As negatively charged
26 NO_3^- seeps away, positively charged alkaline minerals such as calcium, magnesium, and potassium are
27 carried along. Thus, soil fertility is decreased by greatly accelerating the loss of calcium and other
28 nutrients that are vital for plant growth. As calcium is depleted and the soil acidified, aluminum ions are
29 mobilized, eventually reaching toxic concentrations that can damage tree roots or kill fish if the
30 aluminum washes into streams (Vitousek et al. 1997).

31 Forests, grasslands, and wetlands vary substantially in their capacity to retain added nitrogen. Interacting
32 factors that are known to affect this capacity include soil texture, degree of chemical weathering of soil,
33 fire history, rate at which plant material accumulates, and past human land use. However, we still lack a
34 fundamental understanding of how and why N-retention processes vary among ecosystems much less
35 how they have changed and will change with time (Vitousek et al. 1997).

36 An over-arching impact of excess Nr on unmanaged terrestrial ecosystems is biodiversity loss. In North
37 America, dramatic reductions in biodiversity have been created by fertilization of grasslands in
38 Minnesota and California. In England, N fertilizers applied to experimental grasslands have led to
39 similarly increased dominance by a few N-responsive grasses and loss of many other plant species. In
40 formerly species-rich heathlands across Western Europe, Nr deposition has been blamed for great losses

1 of biodiversity in recent decades, with shallow soils containing few alkaline minerals to buffer
2 acidification (Vitousek et al. 1997; Bobbink et al., 2009).

3 Losses of biodiversity driven by Nr deposition can in turn affect other ecological processes. Experiments
4 in Minnesota grasslands showed that in ecosystems made species-poor by fertilization, plant
5 productivity was much less stable in the face of a major drought. Even in non-drought years, the normal
6 vagaries of climate produced much more year-to-year variation in the productivity of species-poor
7 grassland plots than in more diverse plots (Vitousek et al. 1997).

8 *2.4.5.3 Thresholds for excess Nr effects on terrestrial ecosystems*

9 In parallel with the original concept of critical loads developed by Nilsson and Grennfelt in 1988 and
10 now widely used for air quality management in Europe, thresholds in general and critical loads
11 specifically for Nr effects on terrestrial ecosystems in the United States should be understood to be
12 “quantitative estimates of exposure to air concentrations of Nr compounds below which harmful effects
13 on specified sensitive elements within ecosystem of concern do not occur according to present
14 knowledge”(Nilsson and Grennfelt, 1988; Heittelingh et al, 2001).

15
16 In developing these quantitative estimates of thresholds and/or critical loads for terrestrial ecosystems in
17 the United States, it is imperative to understand the extraordinarily wide diversity of types and Nr-
18 sensitivity of various components of terrestrial ecosystems in various parts of the U.S. and the huge
19 differences in purposes and intensity of management and public perceptions of the value of these
20 components to various sectors of American society. Thus, the critical loads appropriate for maintaining
21 species diversity in a natural grasslands in northern Minnesota or a wilderness area in the Mediteranean
22 climate of southern California are likely to be very different from those for direct effects on similar
23 systems in other regions of the U.S. -- or even for beneficial and/or adverse effects on other components
24 of the same terrestrial ecosystem. For example, the threshold or critical load for adverse effects of
25 excess Nr on understory vegetation, beneficial mycorrhizae or lichen communities in a forest ecosystem
26 is likely to be very different from the threshold for adverse effects on the dominant forest trees in that
27 same ecosystem. Thus, public perceptions of “specified sensitive elements within the ecosystem” may
28 be important in determining what specific thresholds or critical loads should be considered in order to
29 minimize or avoid specific adverse effects of concern.

30
31 At present, the sum total of directly measured wet- plus dry-deposited chemically oxidized (NO_y) and
32 chemically reduced (NH_x) inorganic Nr loads in various states within the contiguous states of United
33 States are of the order of 3 to 15 kg N/ha/year [National Atmospheric Deposition Program (NADP,
34 2008), CASTNET, 2008]. As shown in Figure 15, a three-year run of CMAQ model also provided
35 estimates of the average annual total Nr loads, including organic forms as well as inorganic NO_y and
36 NH_x forms of Nr) in the contiguous states of the US. These model estimates varied from minimal
37 deposition values of about 3 kg N/ha/year to maximum estimated values of about 17 kg N/ha/year. This
38 range agrees well with the range of the measurements.

39

1 These directly measured and modeled estimates of total (wet-plus-dry deposition of organic and
2 inorganic forms of Nr indicate that there are several areas, especially in the eastern U.S. and a few areas
3 of the western US, where current total Nr loads are already very close to- or will very likely soon exceed
4 the recommended threshold and critical load estimates provided by Bobbink et al (2009) in their
5 excellent review of scientific evidence regarding the impacts of atmospheric nitrogen deposition on
6 plant diversity in terrestrial ecosystems.

7

8 *2.4.5.4 Additional comments on Nr critical loads*

9 In recent years, the Acid Rain Action Plan developed by New England governors and eastern Canadian
10 Premiers has led to evaluations of critical loads to surface waters and forests in that region. Those
11 studies identified many waters and forest lands that met or exceeded critical load capacity for combined
12 sulfur and nitrogen deposition both in the New England States, as well as in the eastern Canadian
13 provinces. The plan set target decreases of 20 to 30% for nitrogen oxide emissions by 2007 and a 50%
14 decrease in sulfur dioxide emissions by 2010. These targets aimed decreasing long-range transport of air
15 pollutants, acid deposition, and nutrient enrichment of marine waters in this region.

16 In May 2006, a Multi-Agency Critical Loads Workshop was held which led to the formation of a
17 Critical Loads Ad-Hoc Committee (CLAD) within the National Atmospheric Deposition Program
18 (NADP) to, among other goals, “Provide consistency in development and use of critical loads in the
19 US.” One outcome is a project undertaken by the Northeast States for Coordinated Air Use Management
20 (NESCAUM) to: estimate critical loads of sulfur and nitrogen in atmospheric deposition for areas where
21 sufficient knowledge, data, and methods exist” and “to demonstrate the use of critical loads as a tool for
22 assessing environmental policies and programs and managing natural resources.”

23 A February 2007 Workshop sponsored by EPA on “The Assessment of Health Science for the Review
24 of the National Ambient Air Quality Standards (NAAQS) for Nitrogen (NO_x) and Sulfur Oxides (SO_x)”
25 expansively reviewed both ecosystem as well as human health effects toward revision of the NAAQS. In
26 policy discussions at this workshop it was asked if critical loads assessments were an effective means of
27 improving ecosystem management and if the science was understood well enough to use critical loads as
28 a management tool. The conclusion was that although there was a substantial body of accumulated
29 scientific evidence there was only limited use of critical loads approaches for management of air quality
30 in the United States. The Multi-Agency Workshop on Critical Loads mentioned above was cited at this
31 workshop as an agenda-setting effort to resolve some of the science and policy issues that could help
32 advance critical loads approaches in the US.

33 **Finding 16**

34 In this connection, the INC strongly commends EPA for its recently increased willingness to think more
35 holistically – and in more fully integrated ways – about both the policy-relevant science and the practical
36 arts of air quality management aimed at protection of both aquatic and terrestrial ecosystems from
37 adverse effects of Nr. These shifts in both emphasis and approach have included:

- 1) Increased emphasis in the NAAQS review processes on scientific questions that are as directly relevant as possible to well-defined policy questions of concern to EPA;
- 2) More frequent discussion about both public-welfare and public-health impacts of mixtures of air pollutants;
- 3) More frequent discussion about the critical loads concept as an alternative or complement to the more familiar NAAQS Standards;
- 4) Separation of the preparation and review of documentation for a Secondary (public-welfare-based) NAAQS from the (previously always dominating) Primary (public-health-based) NAAQS review processes;
- 5) The decision by the Science Advisory Board of EPA to establish this special Integrated Nitrogen Committee (INC); and
- 6) The unprecedented decision to undertake an integrated [simultaneous] review/ /of the Secondary NAAQS for two Criteria Pollutants at the same time [Oxides of Nitrogen (NO_x) and Oxides of Sulfur (SO_x)].

Especially notable evidence for EPA's "increased willingness to think more holistically – and in more fully integrated ways" is the following statement of Conclusion in the Executive Summary of the December 2008 Integrated Science Assessment for Oxides of Nitrogen and Sulfur (EPA, 2008):

The main effects of N and S pollution assessed in the ISA are acidification, N enrichment, and Hg methylation. Acidification of ecosystems is driven primarily by deposition resulting from SO_x, NO_x, and NH_x pollution. Acidification from the deposition resulting from current emission levels causes a cascade of effects that harm susceptible aquatic and terrestrial ecosystems, including slower growth and injury to forests and localized extinction of fishes and other aquatic species. In addition to acidification, atmospheric deposition of reactive N resulting from current NO_x and NH_x emissions along with other non-atmospheric sources (e.g., fertilizers and wastewater), causes a suite of ecological changes within sensitive ecosystems. These include increased primary productivity in most N-limited ecosystems, biodiversity losses, changes in C cycling, and eutrophication and harmful algal blooms in freshwater, estuarine, and ocean ecosystems.

Recommendation 16. *INC recommends that the EPA give very careful consideration to adoption of the critical loads concept in determining thresholds for effects of excess Nr on terrestrial and aquatic ecosystems.*

2.4.5.5 Reactive Nitrogen Indicators and Limits in Europe

The European Union has undertaken broad measures, based on the critical loads concept, to manage Nr. Tables 20, 21, and 22 summarize several different environmental impacts, currently used indicators, and whether there are current limit values set by the United Nations Economic Commission for Europe (UNECE) or European Union (EU). These tables identify the main links to the cascade of reactive nitrogen in the environment, the relevance and link to Nr of the effect/pollutant, and existing agreements in which the effect is currently addressed. In addition, some impacts are more relevant than others in

1 relation to societal importance and the connection to the nitrogen cascade. The categorization on a scale
2 of 1 (highest relevance) to 5 (unimportant) provides a first level prioritization for future mitigation
3 activity. The last column summarizes existing links to international regulations and conventions.

4 Where there is a limit and the relevance for the nitrogen cascade is high, then this might be the limiting
5 factor for Nr production and its associated losses to the environment. Some limits might be more
6 relevant in specific areas and less relevant in others. For example NO₂ concentrations relevant for
7 human health are limited to 40 ppb in urban areas, limiting industry and traffic, but are probably not an
8 issue in remote areas with low population densities. In these areas, however, loss of biodiversity might
9 limit nitrogen deposition and therewith the sources in the region. The only way to determine the extent
10 that critical thresholds are limiting is by overlaying them for different regions and determining by
11 monitoring data or by model exercises where and which threshold is the limiting factor, putting caps on
12 losses from sources. A pre-classification of regions might be useful, e.g. urban regions, remote regions,
13 marine areas, etc.

1 One aspect of this global view of nitrogen impacts and metrics that is evident is the mix of “classical”-
 2 and “service”-based categories, consistent with the need for an integrated approach to the management
 3 of nitrogen.

4

5 **Table 20: Summary of the effects of excess Nr on human health in relation to metrics, current**
 6 **international regulations and conventions, and the link to the nitrogen cascade**

	Metrics	Regulated?	Link to Nr cascade	Relevance*	Regulatory or political convention
Respiratory disease in people caused by exposure to high concentrations of:					
Ozone	Sum of ozone over 35 ppb	Y	NO _x emissions	3	Convention on Long-range Transboundary Air Pollution Clean Air for Europe
other photochemical oxidants	Org. NO ₃ , PAN conc (atm)	N	NO _x emissions	5	indirectly Convention on Long-range Transboundary Air Pollution et al.
fine particulate aerosol	PM ₁₀ , PM _{2.5} conc (atm)	Y	NO _x , NH ₃ em	1	Convention on Long-range Transboundary Air Pollution Clean Air for Europe
direct toxicity of nitrite NO₂⁻	NO ₂ ⁻ conc	Y	NO _x	2	World Health Organization Convention on Long-range Transboundary Air Pollution Clean Air for Europe
Nitrate contamination of drinking water	NO ₃ ⁻ conc (aq.)	Y	NO ₃ ⁻ leaching	2	EU Essential Facilities Doctrine
Depletion of stratospheric ozone	NO _x , N ₂ O conc/flux (atm)	N	NO _x , N ₂ O	3	Montreal Protocol
Increase allergenic pollen production, and several parasitic and infectious human		N		5	None
Blooms of toxic algae and decreased swimability of in-shore water bodies	Chlorophyll a NO ₃ ⁻ (&P) conc (aq)	N	Runoff, Nr deposition	1	Convention for the Protection of the Marine Environment of the North-East Atlantic Helsinki Commission Barcelona Convention

7 *Relevance and link to nitrogen incorporates societal priority and N contribution: 1) highest relevance, 2) high relevance, 3)
 8 significant relevance, 4) some relevance, 5) unimportant.

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Table 21: Summary of the effects of excess nitrogen on ecosystems related to to currently used metrics, the existence of European regulatory values, and the link to the nitrogen cascade

	Metrics	Regulated?	Link to Nr cascade	Relevance*	Regulatory or political convention
Ozone damage to crops, forests, and natural ecosystems	AFstY (O ₃ flux), AOT40	Y	NO _x	2	Convention on Long-range Transboundary Air Pollution Clean Air for Europe
Acidification effects on terrestrial ecosystems, ground waters, and aquatic ecosystems	Critical loads	Y	Nr deposition	2	Convention on Long-range Transboundary Air Pollution Clean Air for Europe WFD
Eutrophication of freshwaters, lakes (incl. biodiversity)	Biological Oxygen Demand, NO ₃ ⁻ conc (aq) Critical loads	Y N	Runoff, NR deposition	3	Water Framework Directive
Eutrophication of coastal ecosystems inducing hypoxia (incl. biodiversity)	BOD, NO ₃ ⁻ conc (aq) Critical loads	BOD, NO ₃ ⁻ conc (aq) Critical load	Runoff, NR deposition	1	Convention for the Protection of the Marine Environment of the North-East Atlantic Helsinki Commission Barcelona Convention
Nitrogen saturation of soils (incl. effects on GHG balance)	Critical loads	Y	NR deposition	1	Convention on Long-range Transboundary Air Pollution Clean Air for Europe
Biodiversity impacts on terrestrial ecosystems (incl. pests and diseases)	Critical loads, critical levels (NH ₃ , NO _x)	Y	NR deposition	1	Convention on Long-range Transboundary Air Pollution Clean Air for Europe, Convention on Biological Diversity

*Relevance and link to nitrogen incorporates societal priority and N contribution: 1) highest relevance, 2) high relevance, 3) significant relevance, 4) some relevance, 5) unimportant.

1 **Table 22: Summary of the effects of excess N on other societal values in relation to metrics and**
 2 **regulatory values in current international regulations and conventions and the link to the**
 3 **nitrogen cascade.**

	Metrics	Regulated?	Link to Nr cascade	Relevance*	Regulatory or political convention
Odor problems associated with animal agriculture	Acidity in prec., prec./T O ₃ , PM	Y	NO _x , NH ₃	3	Convention on Long-range Transboundary Air Pollution
Effects on monuments and engineering materials	PM _{2.5} conc (atm)	N	NO _x , NH ₃	4	
Global climate warming induced by excess nitrogen	N ₂ O, conc/flux (atm)	N	NO _x , NH ₃	1	United Nations Framework Convention on Climate Change
Regional climate cooling induced by aerosol)	PM _{2.5} conc (atm)	N	NO _x , NH ₃	1	United Nations Framework Convention on Climate Change

4 *Relevance and link to nitrogen incorporates societal priority and N contribution: 1) highest relevance, 2) high relevance, 3)
 5 significant relevance, 4) some relevance, 5) unimportant.

6

7 **2.4.6 Tradeoffs of Nr impacts**

8 Because N is such an abundant and widespread element, and Nr such a critical component of the Earth's
 9 biosphere, associated impacts are many and pervasive. In many cases the impacts of Nr involve
 10 tradeoffs, i.e. mitigating one type of impact may exacerbate others. Four such categories of tradeoffs are
 11 ammonia release from concentrated feed lot operations (CAFOs), human nutrition, nitrification-
 12 denitrification, and nitrogen-carbon related impacts.

13 *2.4.6.1 Ammonia release from CAFOs*

14 As a result of effluent guidelines for NH₃ in aquatic systems, state and federal regulations and programs
 15 under the CWA were developed to address water quality protection from CAFOs. The resulting manure
 16 management systems utilized NH₃ volatilization as a means to remove N and decrease the N in the
 17 manure when land applied. Only recently has the resulting increase in NH₃ emission into the air been
 18 viewed as a potential problem with respect to air quality concerns and N deposition.

19 **Finding 17**

20 Current EPA policy (EPA 2007e) discourages states from controlling ammonia emissions as part of their
 21 plan for reducing PM_{2.5} concentrations. Ammonia is a substantial component of PM_{2.5} in most polluted

1 areas of the U.S. at most times. While it is true that reducing NH_3 emissions might increase the acidity
2 of aerosols and precipitation, the net effect of NH_3 on aquatic and terrestrial ecosystems is to increase
3 acidity. After being deposited onto the Earth's surface, NH_4^+ is under most circumstances, quickly
4 nitrified, increasing the acidity of soils and waters. The committee is unaware of any evidence neither
5 that NH_3 reduces the toxicity of atmospheric aerosols nor that high concentrations of NH_3 occur
6 naturally over any substantive area of the US. Lower NH_3 emissions will lower $\text{PM}_{2.5}$ concentrations.
7 Such reductions in $\text{PM}_{2.5}$ concentrations have been linked to reductions in morbidity and mortality.

8 **Recommendation 17.** *The committee recommends that the EPA presumption that NH_3 is not a $\text{PM}_{2.5}$*
9 *precursor should be reversed and states should be encouraged to address NH_3 as a harmful $\text{PM}_{2.5}$*
10 *precursor.*

11

12 *2.4.6.2 Unintended impacts of lower application rates of nitrogen for crop production*

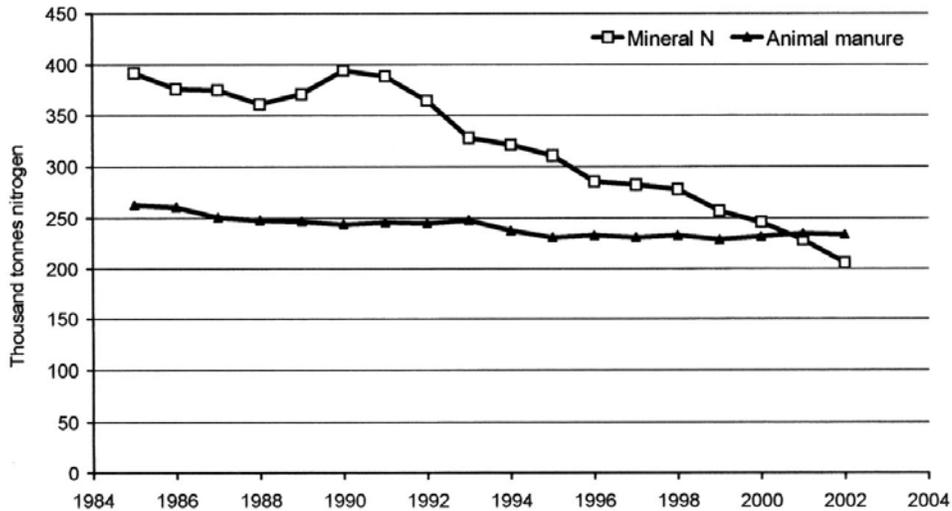
13 Crop production and environmental quality are potentially lost or gained at the expense of each other.
14 Although leakage of N from crop production systems cannot be eliminated, N losses can be minimized
15 substantially. One mechanism of decreasing leakage is to apply less N fertilizer to croplands. For
16 example Hu et al. (2007), using the SWAT model, predict that decreasing N fertilizer application rates
17 10 to 50% in the upper Embrarras River watershed in east central Illinois, would decrease NO_3^- output
18 to the river by 10 to 43%. This simple “solution” can cause problems for crop production as yields and
19 crop quality (protein content) may decrease, causing economic loss to the farmer, decreased food quality
20 for the consumer, and, at a global scale, a reduction in food security.

21 Cropping systems managed in a consistent manner over time reach a functional equilibrium between
22 nitrogen inputs and outputs. Because crop yields are closely linked to the quantity of N accumulation in
23 above ground biomass at maturity (Cassman et al., 2002), there would be a proportional decrease in crop
24 yields in response to a decrease in the amount of N fertilizer application. The magnitude of this yield
25 reduction would depend on the magnitude of decrease in the rate of applied N and the efficiency of N
26 uptake from the applied N, as well as interrelationships with other nutrients' availability. Hence, yield
27 reductions can be mitigated, or even eliminated, if methods and fertilizer formulations used in fertilizer-
28 N application increased the efficiency of nitrogen uptake to offset the reduction in the amount of applied
29 nitrogen. It is also important to note that reduced or insufficient N rates for crop production risk
30 impairment of long-term soil productivity. Jaynes and Karlen (2005) reported that N rates below the
31 agronomic and economic optimum could degrade the soil resource and decrease soil organic matter over
32 time. Thus care must be exercised in any N rate adjustments to protect soil productivity and to support
33 soil resource sustainability.

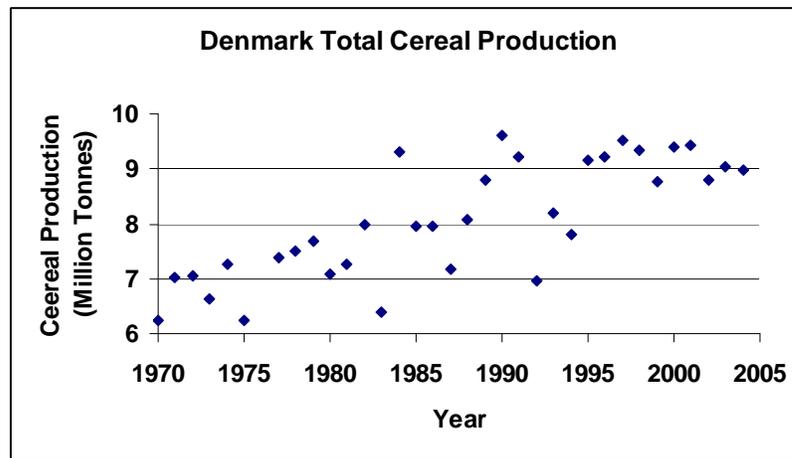
34 An example of the effect of decreasing N fertilizer input to cereal crop production on crop production
35 and crop quality as a result of national efforts to decrease N losses to the environment from crop
36 production is the situation in Denmark. In response to the European Union Nitrate Directive synthetic
37 fertilizer nitrogen use in Denmark was decreased (Figure 23) from approximately 400,000 MT (metric
38 tons) in 1991 to 200,000 MT in 2002. Animal manure N application decreased from 250,000 MT to

1 approximately 240,000 MT during this time period. Nevertheless, although N input into Danish cereal
2 crop production decreased, cereal crop yield remained relatively constant, as shown in Figure 24.

3 **Figure 22: Synthetic and livestock manure used as N fertilizer in Denmark (IFA 2004).**



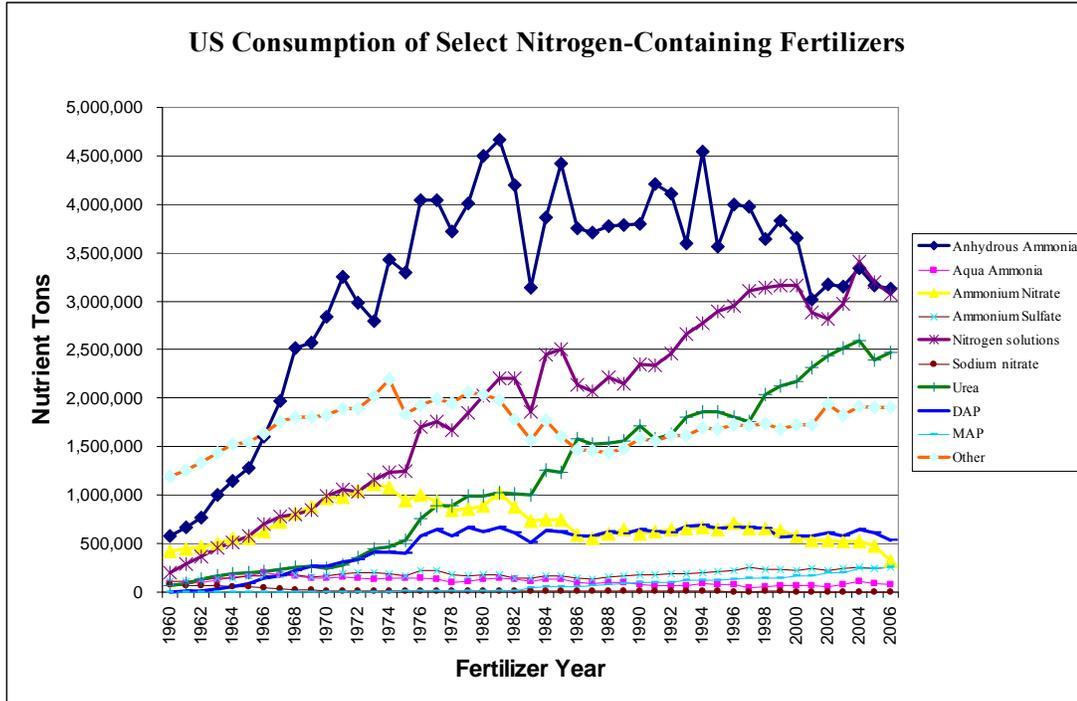
13 **Figure 23: Total cereal grain production in Denmark (FAOSTAT, 2007)**



15 If the methods used to apply N were to be modified to improve its overall efficiency, then it is possible
16 to reduce N fertilizer inputs and maintain, or even increase crop yields depending on the magnitude of
17 the improvement in NFUE (see section 2.3). Although U.S. fertilizer application has not declined over
18 time, it has leveled off in recent years, as shown in Figure 25. Even so, yields, at least for corn grain,
19 have continued to increase, a trend that has been in evidence since the mid 1970s, as shown in Figure 26.

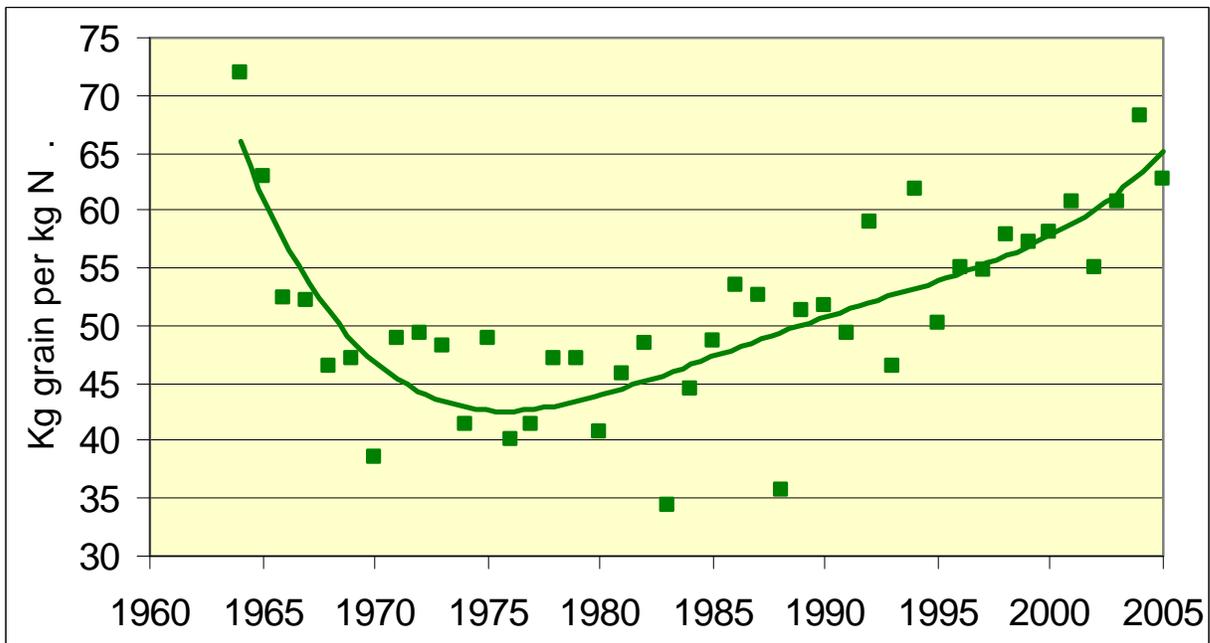
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Figure 24: Consumption of N-containing Fertilizers in the U.S. (USDA)



2

Figure 25: Corn Grain Produced per Unit of Fertilizer N used in U.S. (Fixen and Ford, 2002)



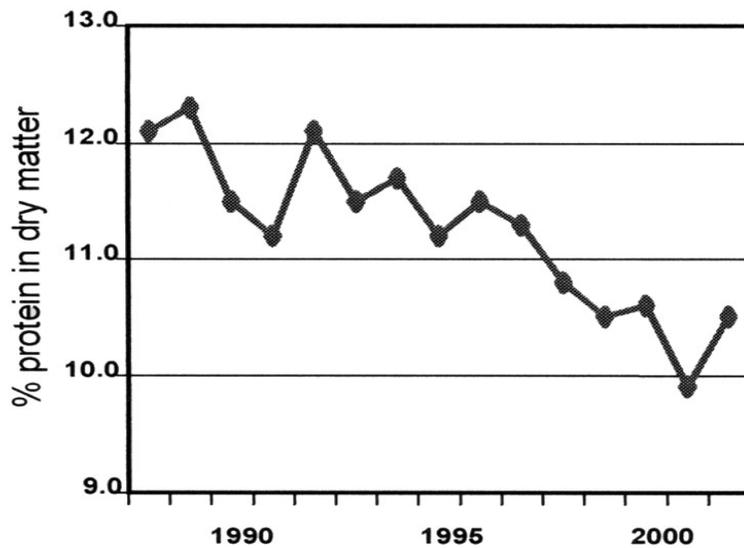
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5 The effect of decreasing N fertilizer input can be estimated based on the current level of PFP for applied
 6 N (average U.S. grain yield divided by the average N fertilizer application rate). Making the assumption
 7 that without a concerted effort to improve N fertilizer application methods, yields will decrease at 90%

1 of the current PFP for N fertilizer (Cassman et al., 2003; Dobermann and Cassman, 2004). With a 10 to
2 50% decrease in N fertilizer application the calibrated SWAT model predicted a 6 to 38% reduction in
3 maize yield in the upper Embrarras River watershed (Hu et al. 2007).

4 A negative impact of decreased Nr input into cereal crop production is the potential for a decline in grain
5 quality as shown in Figure 27 as a decrease in grain protein content in Denmark. Grain protein content
6 in wheat is critical for determining its quality for bread, for example in the U.S. a grain protein content
7 of 12% is considered the threshold for good quality bread wheat, and N fertilizer application rate has a
8 large influence on determining this trait (Cassman et al., 1992). As can be seen, grain protein content has
9 declined from 12 to 10% in Denmark over the same period of lower fertilizer application rates.

10 **Figure 26: Protein content of cereal grain in Denmark (IFA, 2004).**



11

12 Such trends raise several questions if declines continue or are found to be widespread. What is the cost
13 to the farmer and in terms of human nutrition and end-use value? Do these costs offset the
14 environmental benefits created by decreasing N flows from crop production areas? And, what would be
15 the regional and global impact if similar reductions in nitrogen fertilizer inputs to agriculture were put in
16 place in developed countries that represent the largest source of grain exports to international markets?
17 Finally, if protein yields are significantly reduced as a result of lower N fertilization rates, more land
18 may need to be brought into production. Because nearly all prime agricultural land is already used for
19 crop production, expansion of crop area will most likely occur on more marginal land, such as the land
20 currently in the CRP. Such conversion would result in additional N losses from these acres due to
21 relatively low N fertilizer efficiency that typically occurs on marginal land that has multiple soil
22 constraints to crop growth and yield.

23 *2.4.6.3 Unintended impacts: swapping N between environmental systems*

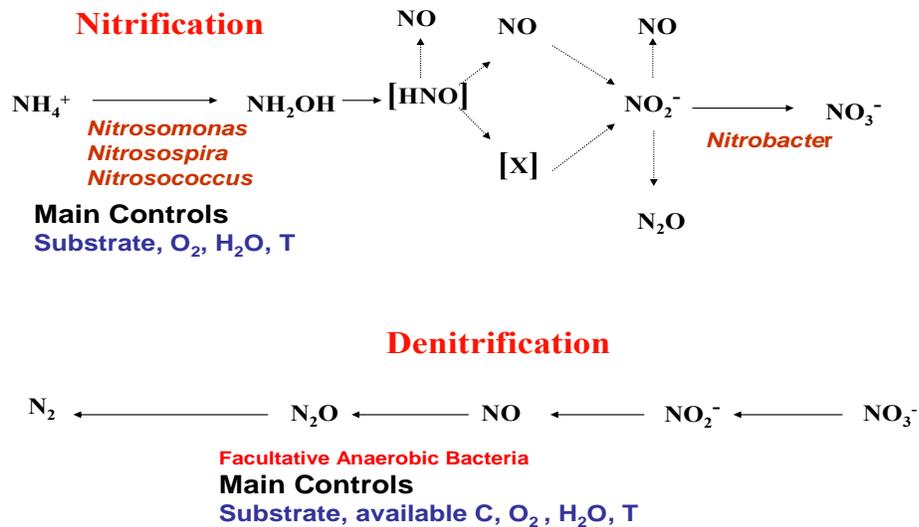
24 Nitrous oxide is produced in “natural” and agricultural soils, and all aquatic systems almost exclusively
25 as a result of microbial processes, nitrification and denitrification. As NH_4^+ ion is the initial mineral N

1 product formed during organic matter mineralization and most fertilizer used worldwide is NH_4^+ based
 2 (e.g. urea, ammonium sulfate; FAO, 2007) the suite of microbiological reactions that result in the release
 3 of gaseous N products need to be considered.

4 Nitrification is the oxidation of NH_4^+ ion to NO_3^- (Figure 28). Most commonly nitrification is a
 5 chemolithotropic process which consists of the conversion of NH_3 to nitrite, which is then converted to
 6 NO_3^- by a second group of bacteria. The ammonia oxidizing bacteria (AOB) are obligate aerobes with
 7 some species that are tolerant of low oxygen environments. The most common genera of autotrophic
 8 NH_4^+ oxidizers are *Nitrosospira* and *Nitrosomonas*, which result in the formation of nitrite. AOB are
 9 found in most aerobic environments where NH_3 is available through the mineralization of organic matter
 10 or N compounds are added.

11 Biological denitrification is the dissimilatory reduction of NO_3^- and nitrite to produce NO , N_2O , and N_2
 12 by a taxonomically diverse group of bacteria. These bacteria synthesize a series of reductases that enable
 13 them to utilize successively more reduced N oxides as electron acceptors in the absence of oxygen. The
 14 general reductive sequence is shown in Figure 28. In addition to the free living denitrifiers,
 15 symbiotically living Rhizobia in root nodules of legumes are able to denitrify nitrate and produce nitrous
 16 oxide (Mosier and Parkin, 2007).

17 **Figure 27: Diagram of the nitrification and denitrification processes (from Mosier and Parkin**
 18 **2007)**



19
 20 The abundant denitrifiers are heterotrophs, which require sources of electron-reducing equivalents
 21 contained in available organic matter. Factors that most strongly influence denitrification are oxygen,
 22 nitrate concentration, pH, temperature, and organic carbon. The reductive enzymes are repressed by

1 oxygen but not by NH_4^+ . Nitrous oxide reductase appears to be more sensitive to oxygen than either
2 NO_3^- or nitrite reductase. Therefore N_2 production predominates in more anoxic sites and N_2O
3 production may be greater in more aerobic conditions. However, the ratio of N_2 to N_2O emitted may also
4 be affected by high NO_3^- concentrations and associated higher levels of electrical conductivity and
5 osmotic stress and soil pH (low pH favors N_2O production).

6 Given these interactions among oxidized and reduced N species, it is important to recognize the
7 potential for unintended consequences to occur as a result of strategies aimed at limiting one form of Nr
8 in air or water that can lead to the increased production of other forms of Nr. One such instance is the
9 potential offsetting of the benefits of NO_3^- remediation at the expense of increasing input of N_2O to the
10 atmosphere.

11 An example of such a situation involves NO_3^- leached from agricultural fields, much of which could be
12 removed from drainage water in natural or reconstructed wetlands. This process is ideal if the
13 denitrification process goes to completion, i.e. only N_2 is produced. If, however, the process is
14 incomplete, and NO and N_2O gases are emitted then the end result may create a compensating risk that
15 could be greater than that posed by the nitrate that is removed. This is because NO continues to be
16 reactive in the atmosphere and is eventually redeposited in aquatic or terrestrial systems and N_2O is a
17 greenhouse gas that has an atmospheric life time of approximately 120 years and a radiative forcing of
18 approximately 300 times that of CO_2 on a hundred year time frame (IPCC 2001), and is a major source
19 of NO in the stratosphere which depletes stratospheric ozone (Crutzen 1981). If more of the NO_3^-
20 denitrified is converted to N_2O in wetlands than upstream or downstream, the environmental cost may
21 be high. Hernandez and Mitsch (2007) found that permanently flooded wetlands had lower $\text{N}_2\text{O}/\text{N}_2$
22 ratios of emissions than did intermittently flooded wetlands. They also found that the ratio was higher in
23 the cold months even though the flux rates are much lower then. A full risk assessment needs to be made
24 to determine how much of such “pollutant swapping” is advisable.

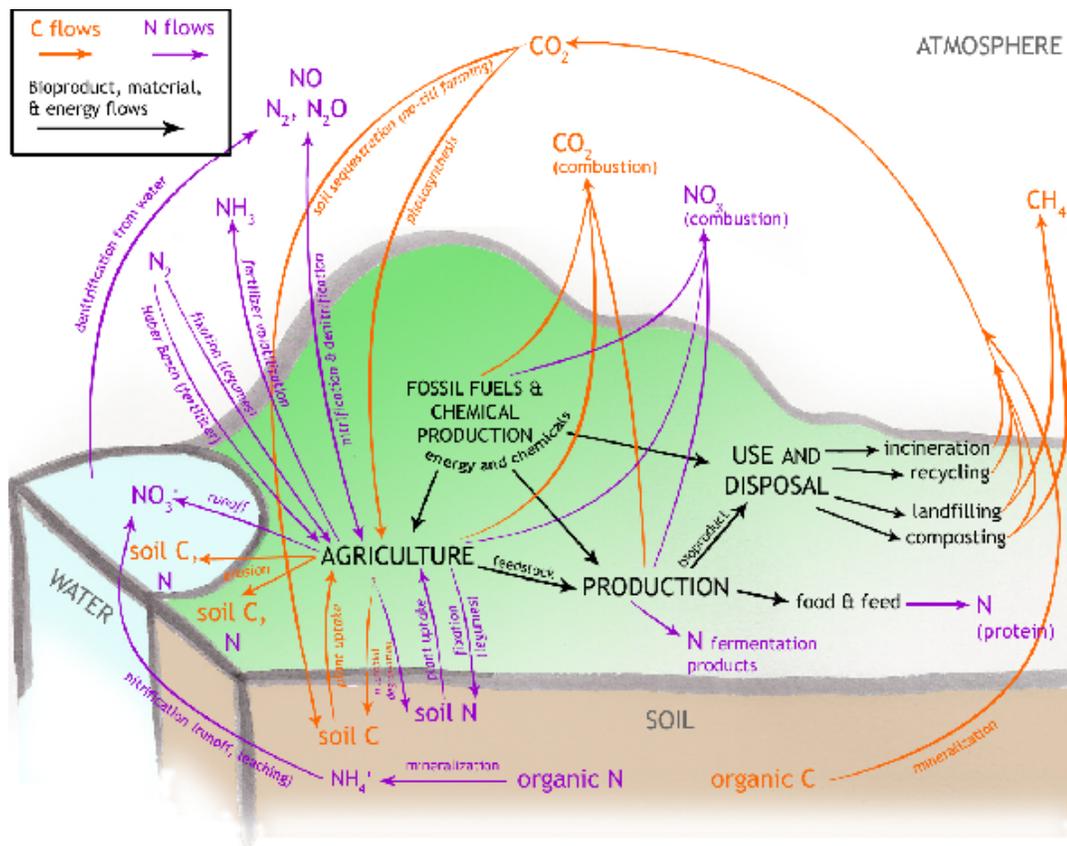
25 A similar potential exists for Nr mediation in sewage treatment, for which current practice is to convert
26 ammonia/ammonium that mineralizes from excreted organic matter to nitrate through the nitrification
27 process. As nitrate containing effluent from sewage treatment flows into aquatic systems the nitrate may
28 be denitrified, resulting in N_2O production if denitrification is not complete. The protein consumption by
29 the ~301 million humans in the U.S. results in the processing of ~ 2 Tg of N annually (~18.4 g N/
30 person/d), much of which flows through sewage treatment facilities and ultimately leads to the
31 production of 0.06 – 0.1 Tg of N_2O -N /yr in aquatic systems or soils to which sewage sludge is applied.

32 *2.4.6.4 Tradeoffs among C and N-driven impacts*

33 Many of the impacts on the environment to which reactive N contributes are also impacted by other
34 chemical species, notably carbon; there are several points of tangency between the global C and N
35 cycles, as depicted in Figure 29. The implication of these interactions is that, in many instances, the
36 perturbation of one cycle cannot be fully assessed without including effects on the other. For example,
37 proposals to develop bio-based products (biofuels, but also other products) as the preferable alternative
38 to fossil-based resources are not impact-free. Such “trade-offs” may involve a single impact, e.g. global

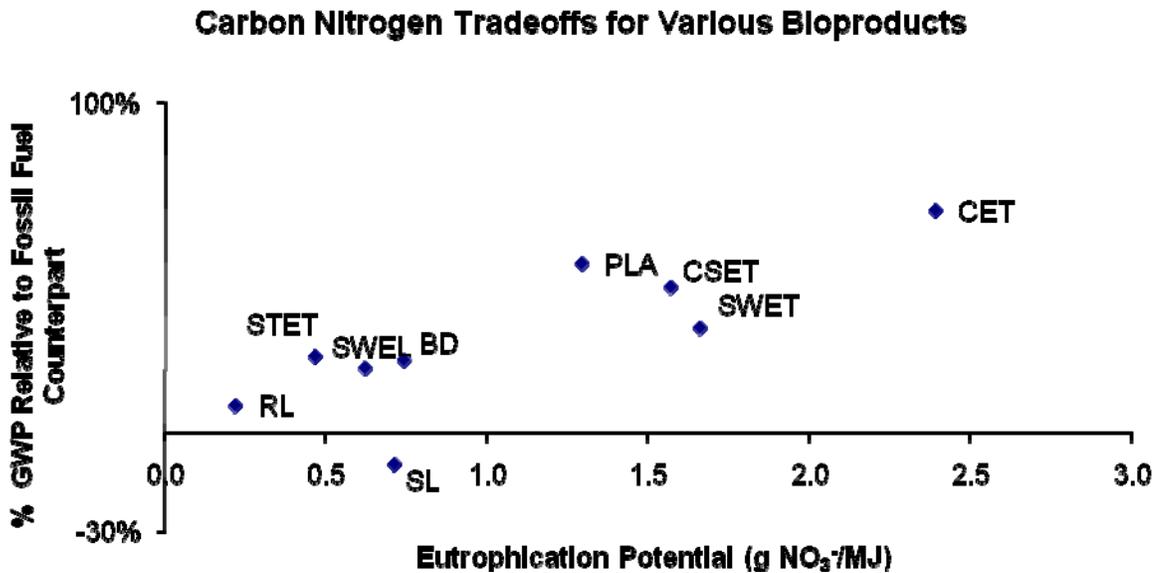
1 climate change for which both carbonaceous gases and N₂O contribute, but may also involve trade-offs
 2 between impacts that are not easily compared. Figure 30 shows the latter case in the form of global
 3 warming impacts (for which C is a principal contributor) versus eutrophication impacts (for which
 4 nitrogen is a principal contributor) for several different biofeedstock-product combinations which are
 5 evaluated relative to the substituted commercial product made from fossil C. One hundred percent
 6 would mean that the bio-based alternative is no better than the fossil-based counter-product, while the
 7 negative region of the y-axis in Figure 30 represents net C sequestration. It is difficult to make direct
 8 comparisons across disparate impact categories, however Figure 32 suggests that, in choosing among
 9 alternatives, policies that aim to minimize both sets of impacts would be preferred.

10 **Figure 28: Combined carbon and nitrogen global cycles (Miller et al. 2007)**



11

1 **Figure 29: Comparisons Between Global Warming and Eutrophication Impact Categories for**
2 **Various Bioproducts (updated from Miller et al. 2007).**



3
4 (Abbreviations: BD=Biodiesel; CET=Corn Ethanol; CSET=Corn & Stover Ethanol; PLA=Polylactic Acid (Corn);
5 RL=Rapeseed Lubricant; SL=Soybean Lubricant; STET=Stover ethanol; SWEL=Switchgrass Electricity;
6 SWET=Switchgrass Ethanol).

7 **Finding 18**

8 The committee notes that the effective management of Nr in the environment must recognize the
9 existence of tradeoffs across impact categories involving the cycling of other elements, particularly C.

10 **Recommendation 18.** *The committee recommends that the integrated strategies for Nr management*
11 *outlined in this report be developed in cognizance of these interrelations and tradeoffs.*

Chapter 3: Integrated risk reduction strategies for reactive nitrogen

3.1 Introduction

Chapter 2 presented the environmental impacts and metrics associated with the emission of the various forms of Nr and reviewed ways of organizing these into impact “categories.” As noted, Nr has many impacts on the environment, impacts that are interrelated through the nitrogen cascade.

Once the nature and type of impacts are recognized, the risks should be characterized quantitatively, if possible. This information would then be used, along with other considerations such as economic, social and legal factors, to reach decisions regarding risk reduction strategies and the need for and practicability of implementing various risk reduction activities. The regulation of Nr in the environment by EPA follows an impact-by-impact approach which, with few exceptions, examines specific N forms in either aquatic, atmospheric, or terrestrial systems. The principal regulatory authority pertaining to nitrogen is derived from the CWA and the CAA.

3.2 Control strategies for Nr

There are several ways in which the release and control of Nr in the environment can be approached. In general these can be classified as follows:

1. Improved practices—in which the flux of Nr that creates an impact is lowered through better management practices (e.g. on-field agricultural practices, controlled combustion conditions, urban development and landscape management practices)
2. Product substitution—in which a product is developed or promoted which has a lower dependency on or releases less Nr (e.g. N-bearing wastes instead of corn grain as a feedstock for biofuels, development of alternative power sources such as wind and solar)
3. Transformation—in which one form of nitrogen is converted to another form (e.g. nitrification of wastewater, denitrification in engineered or natural systems),
4. Source limitation—in which the amount of Nr introduced into the environment is lowered through preventive measures (e.g. controls on NO_x generation)
5. Removal—in which Nr is sequestered from impacting a particular resource (e.g. ion exchange)
6. Improved use or reuse efficiency—in which the efficiency of production that is dependent on Nr is improved (e.g. increased grain yields for lower Nr applied), or Nr wasted from one source is reused in another (e.g. algal farming).

Effective management of Nr requires combinations of these approaches; none is a perfect alternative for controlling Nr in the environment. Table 23 provides a summary of the pros and cons of each of these approaches.

1 **Table 23: Advantages and limitations of various approaches to Nr control**

Control strategy	Advantages	Limitations
Improved practices, conservation	Lessens one or more impacts	Education cost
Product substitution	Lessens the need for Nr, allows for more targeted uses of Nr	Questions of acceptability, technological issues
Transformation	Reduces one or more impacts to which Nr contributes, for denitrification closes the nitrogen cycle	May contribute to other impacts
Source limitation	Reduce one or more impacts to which Nr contributes	Decreased crop yields, in some cases few viable alternatives yet developed
Removal	Reduces one or more impacts to which Nr contributes	Residuals containing Nr must still be managed effectively
Improved efficiency	Reduces the need for Nr	Research and education costs

2
3 **3.3 Management of reactive nitrogen in the environment**

4 Four types of management strategies for the control of Nr, and other pollutants, in the
5 environment have evolved over the past 40 years:

- 6 1. Command-and-Control—in which an entity’s “right to pollute” is recognized
7 through a series of permitted limitations on emissions, violations of which may
8 result in penalties being assessed.
- 9 2. Government-based programs for effecting a policy, such as directed taxes, price
10 supports for a given commodity, subsidies to bring about a particular end, and
11 grants for capital expansion or improvement.
- 12 3. Market-based instruments for pollution control in which market trading schemes
13 are used to bring about a desired policy end, often at reduced overall cost.
- 14 4. Voluntary programs in which desired ends are achieved using private or
15 government-initiated agreements or through outreach and education.
16

1 3.3.1 Command-and-control⁸

2 Policy makers have traditionally used command-and-control strategies requiring individuals and
3 firms to meet mandatory guidelines. Such an approach evolved as the country was gearing up to
4 meet the requirements first established nationally through the CWA and CAA enabling
5 legislation in the 1970's. Because U.S. capabilities to monitor contaminant concentrations and
6 predict environmental impacts was, generally, rudimentary, early emphasis was placed on
7 "technology-based" approaches for managing emissions, resulting in the promulgation of "best
8 practicable technology" controls, and eventually "best available technology" controls, the idea
9 being that mandating some level of control, even with uncertain improvements on impacts,
10 would be better, and less arbitrary, than other approaches of the time.

11 Nevertheless, both the CWA and the CAA had more specific goals that were aimed at protecting
12 human health, public welfare, and ecosystem health. For example the CAA required states to
13 develop implementation plans (SIPs), the approval of which depended on their ability, once
14 implemented, to meet ambient clean air standards. Likewise, the CWA required greater controls
15 to be implemented for certain water bodies for which technology-based limits alone were
16 insufficient to meet standards (this became the TMDL program).

17 Over time, and as our abilities to monitor, predict, and understand impacts improved, it became
18 possible, or at least plausible, to tailor emission levels on a source-by-source basis, allowing the
19 firm in question to decide its own technological approach. Thus permits, which place strict limits
20 on the amount of pollution a firm is allowed to discharge over a specified period of time, have
21 become the main method for managing the majority of point source contaminants, including the
22 various forms of Nr, in the environment.

23 **Finding 19**

24 The committee finds that there have been persistent increases in the amounts of Nr that have
25 been emitted into and retained within various ecosystems, affecting their functioning. Unless this
26 trend is reversed, it will become increasingly difficult for many of these ecosystems to provide
27 the services upon which human well-being is dependent. The committee believes that there is a
28 need to regulate certain forms of Nr to address specific problems related to excess Nr, and we
29 believe that the best approach for an overall management strategy is the concept of defining
30 acceptable total Nr critical loads for a given environmental system

31 **Recommendation 19.** *The committee recommends that the Agency work toward adopting the*
32 *critical loads approach in the future. In carrying out this recommendation the committee*
33 *recognizes that it will in many cases be necessary for the Agency to enter into new types of*
34 *research, policy, and regulatory agreements with other Federal, State, and Tribal units based on*
35 *cooperative, adaptive, and systemic approaches that derive from a common understanding of the*
36 *nitrogen cascade.*

⁸ Based on **Models in Environmental Regulatory Decision-Making**, National Research Council, 2007.

1 **3.3.2 Market based instruments for pollution control**⁹

2 A fundamental shift in environmental management philosophy was initiated with the 1990 Clean
3 Air Act Amendments, which combined regulatory requirements with market flexibility allowing
4 lower compliance costs through tradable permits. Most market-based policy instruments operate
5 on the principle that if the regulatory framework or some other factor sufficiently alters the
6 relative value of available decision choices for an individual or firm, subsequent decisions they
7 make will be in alignment with the policy maker's objective.

8 As an example, if a government wants to limit pollution in a river where a number of polluters
9 discharge, it need not adopt a uniform command and control limit on each firm. Instead, a
10 regulatory cap on the total permissible pollution can be established at a lower pollution level and
11 permits to pollute that sum to that overall cap can be issued to all firms. Those firms having low
12 pollution control costs will have incentive to control more pollution than their permit allowance
13 and thus have permits they no longer need that can be sold to firms with high costs of pollution
14 control. Because the supply of permits (and the overall cap on the pollutant) is fixed, the
15 regulatory goal is achieved. The tradable permit thus brings about the desired reduction in
16 pollution level at lower cost than if the firms having high costs of pollution control were required
17 to control their full share and low cost of control firms were limited to their share of control. .
18 Tradable permits also encourage cost effective pollution control investment by giving each firm
19 a clear economic signal to invest in new technology to reduce pollution at a level that
20 corresponds to the market value of the permit."

21 As with control strategies for Nr, there is no one universal market-based strategy that is
22 applicable to every policy maker's objective. For example, the nature of incentives available to
23 and effective with producers involved in over-fishing is different from landowners providing
24 environmental amenities. In the former case, the objective is to restrict the intensity of fishing. In
25 the latter case the objective is to encourage private landowners to provide environmental goods
26 and services at the lowest cost possible.

27 Evolution of new market-based strategies is a continuous process. Most strategies have been
28 customized over time to meet local needs. One can group such market based approaches under
29 the following conceptual headings:

- 30 1. Water Quality Tradable Permits: Every polluting entity is allowed to discharge pollutants
31 up to a certain pre-determined limit, defined in concordance with the terms of the CWA. The
32 entities discharging less than their allocated limit generate credits. Under this strategy,
33 credits can be traded with other polluting entities that have exceeded their allocated limit.
34

⁹ Based on Canchi, D., P. Bala and O. Doering, 3/3/2006, Market Based Policy Instruments in Natural Resource Conservation, Report for the Resource Economics and Social Sciences Division, NRCS, USDA, Washington D.C., pp. 4-9.

1 2. Auction Based Contracting: Environmental or conservation contracts are auctioned where
2 individual landowners place their bids to provide such goods or services from their land.
3 Two factors jointly determine the selection of the bids; the amount of the bid and the
4 expected value of the environmental or conservation benefit resulting from accepting the
5 bid.
6

7 3. Individual Transferable Quotas: An individual transferable quota (ITQ) is an allocation
8 privilege to extract a specified quantity of a resource among a selected number of quota
9 holders. The distinctive feature of the ITQ is that the privilege is transferable or leasable. An
10 ITQ may be a right to produce under favorable circumstances, such as a tobacco quota when
11 tobacco production would normally be limited.
12

13 4. Risk Indemnification for Specified Behavior: An example of this is crop insurance
14 designed to protect farmers from uncertainty in the adoption of best management practices
15 that provide a public good but are inherently riskier.
16

17 5. Easements: Conservation Easements or conservation servitudes refer to the case where a
18 land owner enters into a legally binding agreement to surrender certain property rights for a
19 specified period of time either voluntarily or for compensation. Such arrangements usually
20 provide public goods relative to the environment or conservation (see section 4.3.3).
21

22 The policy maker's objective, the local conditions, and several other factors determine the
23 suitability of a particular market based strategy. For example, a tradable permit strategy is well
24 suited where offsets are possible. In the case of water quality it is not uncommon to find a
25 spectrum of polluters at different levels of contribution. A policy framework that facilitates the
26 emergence of multiple options for polluters to buy credits from more efficient controllers of
27 discharge or to invest in new equipment to achieve further reductions is likely to accomplish the
28 desired level of water quality at the least possible cost to the economy. Table 24 illustrates the
29 potential effective application of a number of market based approaches in specific situations.
30 Accompanying this chapter are two examples of the application of market-based approaches for
31 the design of water quality trading schemes for Nr in watersheds (text box 1: Water Quality
32 Trading to Meet the Long Island Sound Wasteload Allocation in Connecticut and text box 2:
33 Water Quality Trading in the Illinois River Basin).

1

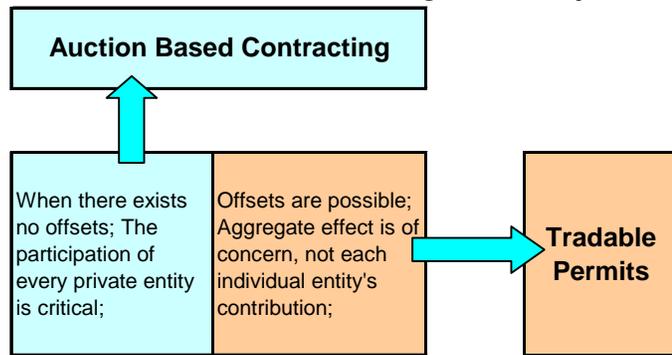
Table 24: Summary of market-based instruments for pollution control

Auction Based Contracting		Individual Transferable Quotas		Insurance for the Adoption of BMPs		Easements		
When there exists no offsets; The participation of every private entity is critical;	Offsets are possible; Aggregate effect is of concern, not each individual entity's contribution;	When the depletion is of concern;	When the discharge is of concern;	Homogenous polluters; Offsets not feasible; Excessive pollution is primarily to mitigate uncertain profits; Modest short-term objective;	Not homogenous polluters; Offsets are possible; Pollution is an absolute consequence of the production process;	Unidirectional; When offsets are not possible; One entity retiring more property rights cannot trade with the other retiring less property rights.	Bidirectional; Offsets are possible; Requires specific action on the part of the participant to accomplish the objective;	Tradable Permits
		Aggregate depletion is of concern;	When there exist no offsets; The participation of every private entity is critical;	Tied to a production process; When risk averseness of the entity can be used to motivate participation;	Not tied to any production process; Suited for motivating participants to engage in secondary activities;	Auction based contracting can be seen as a refined and improved cost-efficient alternative to easements;	Designing of auction based contracting requires considerable professional expertise;	Auction Based Contracting
				Discharge of effluents is of concern;	Depletion of a resource is of concern;	Retirement of rights is of concern;	Acquisition of rights is of concern;	Individual Transferable Quotas
						No uncertainty; No action required on the part of the participant;	Tied to a production process;	Insurance for the Adoption of BMPs

2

3

1 Table 25 shows pair-wise comparison between different market-based strategies. The objective
 2 and the incentive structure of the
 3 participants determine the suitability of
 4 one market based strategy over another.
 5 Each pair of cells briefly lists the most
 6 relevant set of conditions for which the
 7 respective strategy may be optimal (left
 8 cell points to strategy at the top of the
 9 column and right cell points to the
 10 strategy at the end of the row). Consider
 11 the two strategies (illustrated on the
 12 right): Auction Based Contracting and Tradable Permits. If the participation of every private
 13 entity is essential, then Auction Based Contracting works best. For example, if the objective is to
 14 preserve a large tract of privately owned contiguous land. This requires the participation of every
 15 private land owner to set aside a portion of their land. An auction designed to reveal the
 16 individual's land owner's reserve price for participation leads to the most efficient solution.
 17 Compared to this, if the objective is an overall reduction of a pollutant regardless of the
 18 individual private entity's contribution to the abatement, Tradable Permit strategy with a cap is a
 19 more appropriate strategy.



20

21 **Text Box 4: Water Quality Trading to Meet the Long Island Sound and Wasteload**
 22 **Allocation in Connecticut**

23 Pollutant trading is increasingly being promoted as a cost-effective means for attaining water
 24 quality standards. Connecticut and New York have been working with the EPA Long Island
 25 Sound Study (LISS) for more than 20 years to address low oxygen conditions (hypoxia) in Long
 26 Island Sound that have been linked to excessive loadings of nitrogen. A Total Maximum Daily
 27 Load (TMDL) for nitrogen, drafted by the two states and approved by the EPA in 2001, set a
 28 58.5% nitrogen reduction target in 2014 from point and nonpoint source/stormwater sources.
 29 Connecticut has initiated a point source trading program for 79 municipal sewage treatment
 30 plants (STPs) to facilitate implementation of the TMDL wasteload allocation (WLA) and is
 31 investigating the potential for incorporating nonpoint source/stormwater into the existing
 32 Nitrogen Credit Exchange (NCE).

33 Several prerequisite conditions essential to the success of the current point source trading
 34 program have been met. Briefly, 1) all the STPs contribute to the same water quality problem; 2)
 35 the technology to remove N and meet the targets exists; 3) there are compelling member benefits
 36 to participate, especially cost savings; 4) sources can be easily monitored and tracked by end-of-
 37 pipe monitoring; 5) credit cost calculations are based on established and agreed upon protocols
 38 founded in state legislation; 6) sources of N are diverse and create viable supply and demand
 39 conditions while reducing overall cost, with close control by a Nitrogen Credit Advisory Board;
 40 and 7) transaction costs are low relative to credit prices. In operation since 2002, the NCE has
 41 proven to be a viable and effective mechanism for meeting the nitrogen WLA.

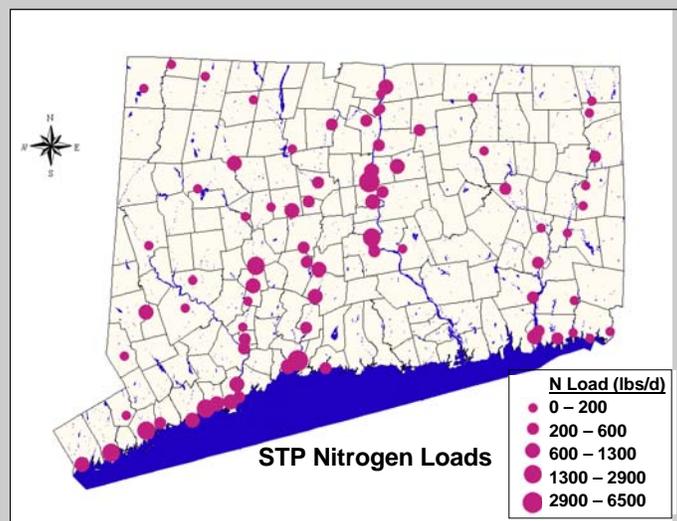
1 The economic record of the NCE demonstrates the vigor of trading over the first five years of
 2 completed trades from 2002-2006 (21). In sum, more than 10 million credits have been traded on
 3 the NCE representing more than \$22 million in economic activity.

4 The use of geographically-based trading ratios is instrumental to the relative cost of meeting N
 5 reduction limits at the 79 treatment plants, which are scattered throughout the state (Figure 31).
 6 Because N is reactive as it travels down rivers into the Sound, and the Sound's currents further
 7 affect relative impacts as they transport N and the resulting algal blooms to the hypoxic areas at
 8 varying efficiencies, location of each treatment plant makes a difference in relative impact on
 9 dissolved oxygen per pound of N discharged at end of pipe. Generally, the closer a POTW is to
 10 the edge of the Sound, and the closer to the hypoxic zone, the higher the trading ratio (Figure
 11 25). For plants with high trading ratios, economics often favor treatment, while those with lower
 12 ratios may find the purchase of credits economically advantageous over treatment.

13 **Table 25: Performance of the NCE, 2002-2006**

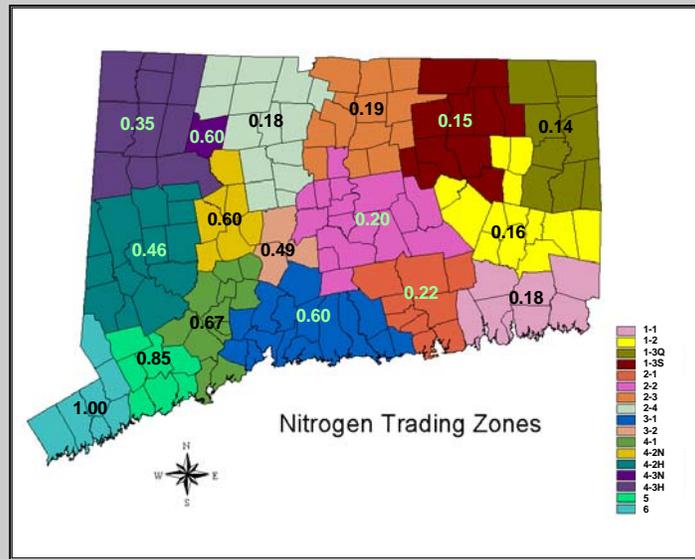
Trading Year	Credit Price (Dollars)	Purchased (Dollars)	Sold (Dollars)	Purchased (1000 Credits)	Sold (1000 Credits)
2002	\$1.65	\$1,317,223	\$2,357,323	798	1,429
2003	\$2.14	\$2,116,875	\$2,428,636	989	1,135
2004	\$1.90	\$1,786,736	\$2,659,804	940	1,400
2005	\$2.11	\$2,467,757	\$1,315,392	1,170	623
2006	\$3.40	\$3,828,114	\$2,394,956	1,126	704
Total		\$11,516,705	\$11,156,111	5,023	5,291

14 **Figure 30: Relative nitrogen discharge (lbs/day) from 79 POTWs**



1

Figure 31: Trading ratios for municipalities in Connecticut



2

3 The point source NCE does not reflect a free market approach to trading. Demand is set by the
4 annual general permit limit and supply of credits is constrained by the availability of WCF
5 dollars and the timing and location of N removal projects. Nevertheless, there is a tendency
6 towards implementing cost effective projects as STP authorities decide whether it is less
7 expensive to treat or buy credits, and try to predict when that break-even point might occur that
8 would warrant application for project funding.

9 Incorporating a NPS/SW component into the existing point source trading program presents
10 some difficult challenges. Among the seven prerequisite conditions listed above that are well
11 met by the current point source program, NPS/SW trading does not provide compelling
12 economic benefits for members; NPS/SW N is difficult to quantify and track; credit cost
13 estimation does not have a strong foundation in any existing programs; NPS/SW credit costs,
14 though geographically diverse, may not result in significant implementation savings; and
15 transaction costs (or time spent negotiating the ground rules for NPS/SW trading) may be
16 considerably higher than for point source credits. Many of these obstacles can be overcome by
17 deferring to models and textbook costs and efficiencies for NPS/SW BMPs. Tracking will still
18 be a challenge because of the sheer number and distribution of BMPs that can be applied
19 throughout the state that will have to be recorded and quantified.

20 Basic economic principles suggest that a free-market arrangement will not produce many
21 NPS/SW credits for market. Costs are much higher than for point source credits and a regulatory
22 approach must therefore be instituted to formalize the load allocation for nitrogen and to
23 structure participation by municipalities.

24 If a NPS/SW trading component were to be added in the future, it would most likely also be an
25 incentive-based program rather than a free-market approach. Nitrogen is difficult and costly to
26 control in Connecticut's urban/suburban setting, and reductions are unlikely to be cost
27 competitive with POTW credits in a free market system. However, because municipalities are
28 required to implement the Phase II stormwater permit, and various federal, state and local
29 programs that require or emphasize NPS/SW management, there may be benefits of an incentive-

1 based approach to offset some of those costs. For example, payment for NPS/SW reductions at
2 the same credit prices paid to POTWs under the NCE would help defray costs, and encourage
3 additional nitrogen reductions from stormwater/NPS sources. Connecticut and the NCAB will
4 continue to evaluate and explore the viability of these options.

5 Further, the cost for management will be enormous. EPA's Clean Water Needs Survey (EPA
6 2008) has identified more than \$200 billion in wastewater management infrastructure needs that
7 does not fully address nutrient control from both traditional point as well as nonpoint/stormwater
8 sources or consider alternative technologies.

9 Although there are significance differences between water and air quality trading, there are also
10 several potential barriers to effective trading systems for both media. These are related to
11 accountability and monitoring; establishing standards and management goals; complexities of
12 cross media and multiple source trading, including parity of sources; insurance that outcomes
13 would reduce risk (environmental benefit); economics and marketability of traded credits; and
14 transparency of the program including public outreach and stakeholder involvement.

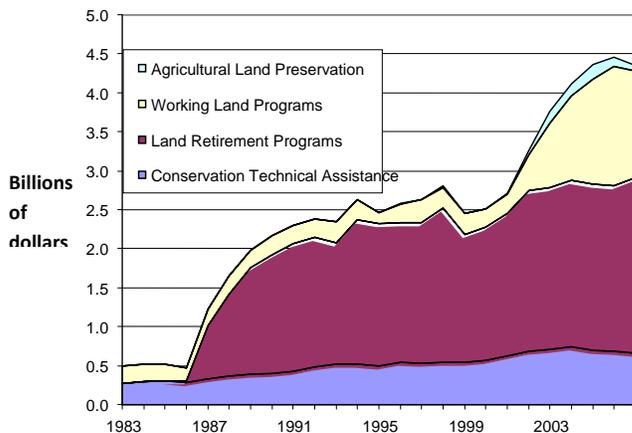
15 **3.3.3 Government programs, mandates, and policy conflicts**

16 The direct allocation of federal funds, and government policy mandates (for various purposes)
17 have created a variety of results, sometimes in conflict, that directly or indirectly affect Nr
18 generation and management. Chief among these are those associated with U.S. agricultural and
19 land-use policies, energy and transportation policies, and both point and non-point mandated
20 controls on N-bearing aquatic resources including domestic and industrial wastewaters and
21 agricultural runoff.

22 The principal agricultural conservation programs in the U.S. are administered by the USDA, and
23 consist of the Conservation Reserve and Wetland Reserve Programs (CRP and WRP, land
24 retirement programs), Environmental Quality Incentives Program (EQIP, a "working lands"
25 program), various land preservation programs, and technical assistance programs to agricultural
26 land managers. USDA also manages price support programs and insurance and disaster programs
27 that, collectively, have relatively little potential for impacting Nr management). Figure 29
28 illustrates funding trends for major initiatives showing the slowing of growth in retirement and
29 assistance programs while preservation and EQIP have increased more recently. The committee
30 is not able to provide guidance on the appropriate levels of funding for these programs. Slowing
31 of the CRP may be a result of energy policy initiatives (see below). Increases in EQIP appear to
32 be associated with greater attention to livestock production, a trend that reflects growing needs
33 for better management practices in this area (see below and section 2.3). Of concern to the
34 committee is the need for more effective approaches aimed at encouraging farmers and land
35 managers to adopt proven conservation strategies at the field, farm, and feedlot scale (e.g. more
36 advanced testing methods, geographic position systems-based variable rate fertilizer application,
37 conservation practices for conserving Nr), and landscape scale (e.g. riparian buffers and filter
38 strips, wetlands, and stream restoration). It is clear that the extent of such practices fall far below
39 the technological frontier.

1

Figure 32: Trends in USDA Conservation Expenditures, 1983-2005



2

3 The construction and/or restoration of wetlands have received considerable attention in the past
4 two decades as a conservation method. Such an approach has several positive attributes including
5 promoting denitrification in watersheds containing or receiving Nr, flood protection, habitat
6 preservation, and recreational potential (Hey and Philippi, 1995). In the upper Mississippi basin
7 optimum siting of wetlands could result in as much as 0.4Tg of NO₃ converted to N₂ (Hey,
8 2002; Mitsch et al., 1999). Of concern is the potential for the formation of N₂O in such systems
9 if not operated properly. Further details of wetlands as a management tool are presented as an
10 example in the accompanying text box.

11 **Text Box 5: Water Quality Trading in the Illinois River Basin**

12 For various reasons, wetland restoration has been proposed and the magnitude of needed
13 restoration estimated. For the Wetland Reserve Program (WRP), the Farm Bill of 1990 set a
14 goal, for the WRP of restoring approximately 1 million acres. A few years later, the NRC (NRC,
15 1992) proposed a national goal of restoring 10 million acres of inland and coastal wetlands by
16 2010. The council went on to recommend that 400,000 miles of streams and rivers be restored by
17 2012 and that 1 million acres of lakes be restored by 2000, both of which would further the
18 control of reactive nitrogen. While none of these goals has been or is likely to be met by the
19 recommended date, they articulated a need for wetland restoration addressing the important
20 relationship between wetlands and water quality.

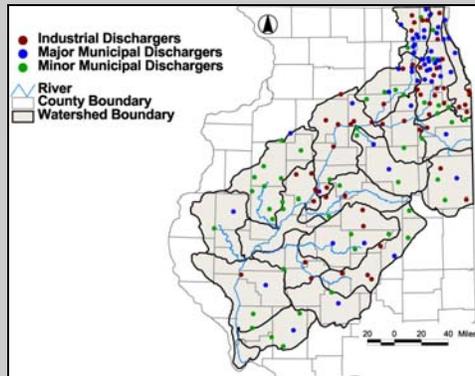
21 Taking into account the economics of using wetlands to manage Nr adds yet another dimension
22 to site selection. Based on the results of the Water Environment Research Foundation's study
23 (Hey et al., 2005), The Kinship Foundation sponsored a study (Kostel et al., in preparation) to
24 define the market for producing and selling Nr (as NO₃⁻) credits. For this analysis, a real,
25 potential market area was selected: the Illinois River watershed in Illinois—the tributaries
26 draining Wisconsin, Indiana and Michigan were excluded. The producers of nitrogen credits
27 were identified as “nutrient farmers” and they became the “sellers” of N credits. The “buyers,”

1 of nitrogen credits, were restricted to municipal and industrial wastewater treatment facilities,
2 those facilities that hold an NPDES permit. This restriction, of course, resulted in a considerable
3 understatement of the market size since the identified buyers emit less than 11% of the total
4 aquatic N load (David and Gentry, 2000), which finds its way to the Mississippi River—air
5 emission/deposition and agriculture account for the remaining 89%.

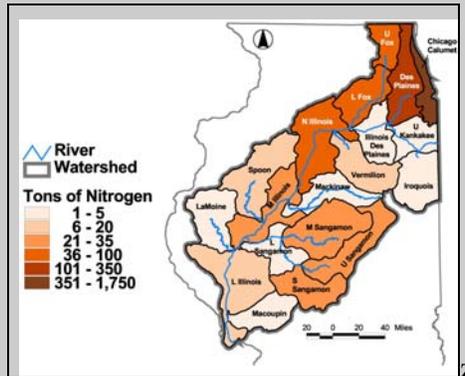
6 The watershed was divided into 19 sub-watersheds, spatially locating credit supply and demand.
7 A linear programming model was developed and used to 1) examine the potential extent and
8 distribution of nitrogen credit demand and supply; 2) compare the average seasonal demand
9 levels to the supply capacity of nutrient farms; and, 3) evaluate the relative effects of seasonality.
10 Market efficiency was imposed through the objective function: the least costly distribution of
11 credit production to meet the given monthly demand. Thereby, sellers and buyers were identified
12 and linked and the spatial characteristics of the market mapped by sub-watershed. At the same
13 time, the equilibrium price of a credit, or the prevailing price at which buyers and sellers are
14 willing to trade, was determined. The market, as represented by the model, determined where the
15 most intensive wetland investment (i.e. wetland restoration) would be, the revenues returned to
16 these investments, and the costs and savings to the buyers.

17 All 290 permitted dischargers (buyers) are geographically distributed as shown in Figure 33. The
18 mass loading of the buyers (2,423 tons/month) is reflected in Figure 34. 89% of the demand
19 comes from the northeastern corner of the basin (Upper Fox, Des Plaines, and Chicago/Calumet
20 sub-watersheds), the Chicago metropolitan area. As illustrated by Figure 35, 41% of the wetland
21 restoration area (using the criteria discussed above) were identified in the southwestern corner of
22 the watershed (Lower Illinois, La Moine, Macoupin, Lower Sangamon, and Middle Illinois sub-
23 watersheds), where the floodplain is almost entirely leveed. For the market study, the available
24 load of Nr (NO_3^-) by season and sub-watershed was mapped as illustrated in Figure 36. The N
25 load was computed using water quality and flow data collected by the USGS from 1987-1997.
26 The wetland and wastewater cost functions are described in Hey et al., 2005; however, the
27 wetland cost functions were modified for the market study to reflect the variability of land costs
28 across the watershed (i.e., higher land values in urban Chicago vis-à-vis lower land cost in rural
29 Illinois). This variability is reflected in the spatial distribution marginal costs shown for the
30 spring marginal costs grafted in Figure 37. As previously noted, wetland treatment costs vary by
31 time of year because the level of microbial activity, which drives the denitrification process,
32 varies with water temperature. So, in the winter more wetland area is required than in the
33 summer to treat an equivalent load of Nr.

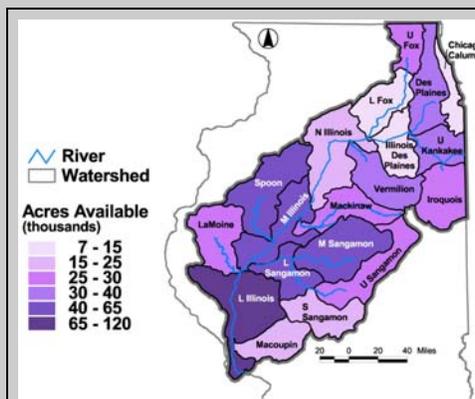
1 **Figure 33: Distribution of municipal (> 1 MGD discharge), and industrial dischargers in**
2 **the Illinois River Watershed; symbols may represent more than one discharger at that**
3 **location**



4
5 **Figure 34: Distribution of total nitrogen emissions by sub-watershed**



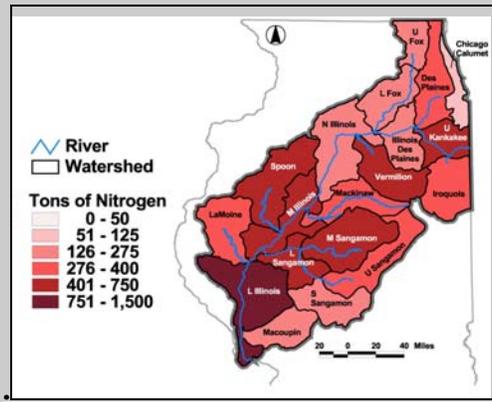
6
7 **Figure 35: Potential land availability in the 100-year flood zone for nutrient farming in**
8 **each sub-watershed in the Illinois River Watershed**



9

1

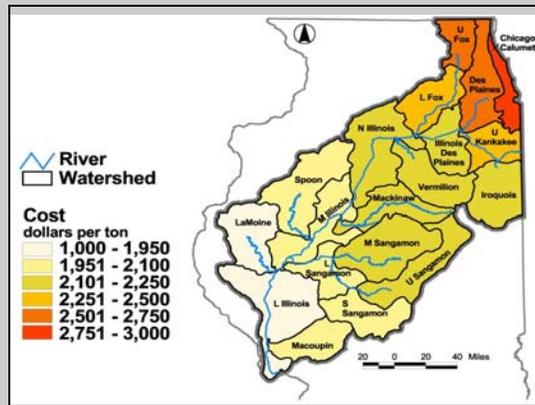
Figure 36: Spring available total nitrogen load by sub-watershed



2

3

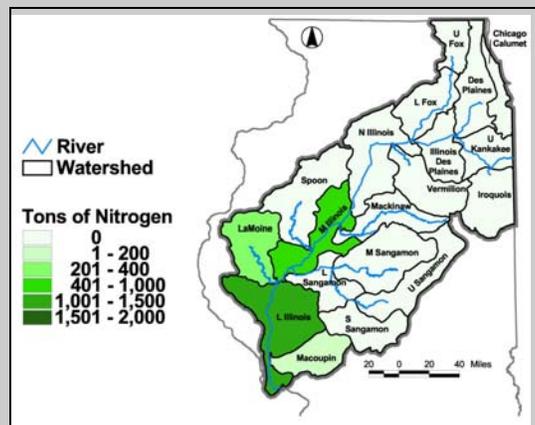
Figure 37: Spring marginal cost (price) by watershed.



4

5

Figure 38: Unrestricted spring credit sales (tons/month) by sub-watershed



6

Three Regulatory Scenarios

8

Regulatory agencies may require that dischargers and nutrient farms be located in proximity to each other and could impose “penalties” when the two are not. Thus, for the sake of analysis, the committee created three regulatory scenarios: 1) unrestricted (buyers can purchase nitrogen credits from nutrient farmers anywhere in the watershed without regard to location (the result of

11

1 this scenario is given in Figure 38); 2) restricted intra-watershed (buyers must purchase all
 2 available credits within its own sub-watershed before buying in other sub-watersheds); 3)
 3 Accrued 10% penalty (buyers pay an increasing “tax” on credits purchased in consecutive
 4 downstream watersheds). The three regulatory scenarios were analyzed for each of the four
 5 seasons. All results are can be found in Kostel et al. (2007) or Scott et al. (in preparation).

6 The “unrestricted” scenario is the least expensive because nutrient farms in this scenario are
 7 located downstate where land is least expensive. In the other two scenarios, credits were
 8 purchased a little more evenly throughout the watershed. Still, most of the credits in the southern
 9 corner of the watershed were purchased. The “restricted intra-watershed” and “accrued 10%
 10 penalty” scenarios resulted in more credits being purchased. This resulted in the sale of N credits
 11 exceeding the mass of Nr emitted by wastewater treatment, which would benefit the overall
 12 control of reactive nitrogen. It also would increase the value of the market and the profits of the
 13 nutrient farmer. The down side of such regulatory controls is that they would drive up the price
 14 effective price of nitrogen credits. If a buyer had to buy a 1.5 tons for every ton discharged
 15 because credits are not available in the tributary watershed, the effective price of a credit would
 16 be 1.5 X price of the tributary sub-watershed. If prices rise too much, “concrete and steel”
 17 technologies may become competitive.

18 Considering all of the point source dischargers in the Illinois River watershed, between 29,000
 19 and 36,000 tons TN/year could be removed through nutrient farming under the studied trading
 20 schemes (Table 26). The range of removal is a function of the penalties imposed on the market
 21 by the regulatory agencies. Accordingly, the market revenue would range from \$70 million to
 22 \$121 million/year. This is a sizeable market that could generate substantial profits, from \$6
 23 million to \$38 million with the return on investment varying from 5 to 25%. If the savings are
 24 shared evenly between the seller and buyer, the nutrient farmer could earn between \$200 and
 25 \$300/acre/year net profit, which in many cases is greater than the profits from corn or soy bean
 26 production. Further, these profits do not include any earnings from flood control or recreation as
 27 suggested in the McKnight study report (Hey et al., 2004). With such profits, sufficient land
 28 should be available for nutrient farming.

29 **Table 26: Nutrient Farm Market Parameters Under Three Trading Scenarios (Kostel et**
 30 **al., in preparation).**

Parameter	Unrestricted	Restricted Intra-watershed	Accrued 10% Penalty
Total Credits Sold (tons)	29,078	29,078	35,781
Total Revenue ¹⁰	\$69,925,497	\$99,571,889	\$121,457,652
Total Cost to Produce Credits	\$63,258,006	\$66,193,924	\$83,288,747
Profit	\$6,667,491	\$33,377,968	\$38,168,905

31
 32 This analysis indicates that appropriate lands are available and that wetlands can be effectively
 33 restored and efficiently used to control reactive nitrogen. The market, structured as discussed

¹⁰ Assumes all credits were sold at the cheapest cost within the Illinois River Watershed.

1 above, could generate the capital to accomplish the needed large-scale wetland restoration while
2 saving tax payers the cost of upgrading their municipal wastewater treatment plant (TWI, 2007).

3 **3.3.4. Biophysical and technical controls (control points) on transfer and transformations** 4 **of Nr in and between environmental systems.**

5 Within the nitrogen cascade there are a number of places where the flow of Nr is constrained or
6 regulated, either by nature or by human intervention, or a combination of the two. This report
7 refers to these places in the cascade as “control” points. The control points may restrict the flow
8 of Nr species within environmental systems (atmospheric, terrestrial, aquatic) or between them.
9 The control points vary from primary controls where Nr is minimized through conservation
10 measures or through after the fact measures that attempt to convert Nr that is emitted or not fully
11 used to nonpolluting products, such as to N₂ by denitrification or through long-term storage. The
12 discussion of choke points is primarily focused on biophysical controls in terrestrial and aquatic
13 environmental systems. A concluding section on technical controls discusses possibilities for
14 decreasing NO_x emissions from combustion.

15 *3.3.4.1. Biophysical controls in terrestrial environmental systems*

16 Approximately 36 Tg of new Nr is introduced into the US. each year (Table 1). This new Nr is
17 derived from consumption of ~11 Tg of synthetic N fertilizer, ~8 Tg of N is fixed by biologically
18 by crops, and ~ 5 Tg is emitted from fossil fuel combustion annually. This N is used to produce
19 food and fiber (~15 Tg) or is formed during electrical generation, industrial production or
20 transportation. Efforts to decrease the creation of new Nr should first look to conservation.

21 Conservation of fossil fuel and resulting decrease in use of fertilizer in food and fiber production
22 or decreased Nr emission can come through a variety of mechanisms such as more energy
23 efficient industrial processes, energy efficient homes and vehicles. Further gains are possible
24 through conservation practices and alternatives to wasteful approaches, such as improving public
25 transportation to minimize use of personal automobiles, and use of local products that don't
26 require long-distance shipping.

27 Conservation in food and fiber production and food consumption can also play an important role
28 in limiting Nr. As agriculture is the largest consumer and producer of Nr, consumption of
29 fertilizer N could be decreased by changes in diet and increasing fertilizer N use efficiency in
30 crop and fiber production systems. The control points discussed in this section include: protein
31 consumption in the human diet, removing croplands that are susceptible to Nr loss from crop
32 production, decreasing fertilizer N demand by increasing fertilizer use efficiency in crop and
33 fiber production, turf grass and nitrogen fertilization in the US, and managing Nr during
34 recycling through livestock production.

35 *Decreasing the amount of fertilizer N needed through changes in human diet.* Along with
36 increasing fertilizer N use, continued high intake of protein in developed countries and changes
37 in the diet of people in developing countries will likely lead to greater N losses from global food
38 production in the future. The first aspect of changes in food production concerns increasing
39 protein consumption as global population increases and gets wealthier, which is likely to require
40 increased N input into food production (Galloway et al. 2007; Naylor et al, 2005).

1 The average protein supply per person in developed countries is presently ~100 g per day, while
2 in the developing countries it is only ~65 g per day [Food and Agricultural Organization
3 Statistical Database (FAOSTAT), 2003). Protein is used because there is a direct proportionality
4 between protein and nitrogen composition of food (ca 0.16 g N per 1 g protein). On average in
5 1995, developed countries consumed ~55% of total protein from animal sources while
6 developing countries derived ~25% of total protein from animals. Protein consumption was
7 highest in the U.S. and western Europe, ~ 70 and ~60 g animal protein per person per day,
8 respectively. In 2003, total protein consumption in the U.S. was 115 g person per person per
9 day (74 derived from animals and 41 from vegetable. (FAOSTAT, 2003). In developing
10 countries, the greatest change in animal protein consumption has occurred in China where the
11 consumption of meat products has increased 3.2 fold (from ~ 10 to ~32 g per person per day)
12 since 1980. In Sub-Saharan Africa there has been no increase in either total (~ 50 g per person
13 per day) or animal protein (~ 10 g per person per day) consumption during the past 30+ years
14 (Mosier et al., 2002).

15 The reason for focusing on the consumption of animal protein is that more N is needed to
16 produce a unit of animal protein than an equal amount of grain protein. Bleken et al. (2005) note
17 that the N cost of animal production in Norway and the Netherlands was approximately five
18 units of N in feeds for each unit of N produced. Approximately 2.5 units of N are required to
19 produce a unit of wheat protein-N. Bequette et al. (2003) report that dairy cattle consume four
20 units of N in feeds (including forage and grains) for every unit of N that appears in milk. Using
21 a range of efficiencies for animal production practices, Kohn et al. (1997) estimated that 4 to 11
22 units of fertilizer N would be used in a whole farm system to produce a unit of milk protein.
23 This ratio would be lower when using legume N to feed cattle, as is commonly done. Based
24 upon the extra N required to produce animal protein compared to grains, continued high protein
25 consumption in developed countries and changes to higher protein diets in developing countries
26 will likely increase N input and losses in food production.

27 Moderating this increase by decreasing the average amount of total protein consumed in
28 developed countries is one mechanism of limiting part of the expected increased N requirement
29 in food production. One example of a country with a good food supply and moderate
30 consumption of animal protein is Italy in 1963. At that time food supply was adequate to ensure
31 sufficient nutrition to all groups of society (Bleken 1997). Total protein consumption was 85 g
32 per person per day, and consumption of animal protein was 32 g, roughly half of the current US
33 diet, and yet much higher than the average of developing countries. Another example is Japan,
34 where animal protein consumption has traditionally been low, although it has increased from 25
35 g in 1963 to 54 g animal protein per person per day in 1995. In the same period the total protein
36 consumption has increased from 73 g to 96 per person per day.

37 Bleken (1997) analyzed the relation between human diet and global N need for food production.
38 Her analysis indicates that the total N needed for diets with high animal protein intake
39 (comparable to many industrialized countries today) are almost twice as high as the N needed for
40 the average diet in Italy 1963, mentioned above, or for Turkey in 1993. Based on her analysis,
41 the committee assumes that in the high-N input regions per capita N need for food production
42 may be reduced by 45%, which would reduce present-day N inputs by 15% worldwide.

43 Switching to a lower protein diet may not, however, reduce N losses if the new diet includes
44 increased quantities of fruits, vegetables, and nuts, in addition to staple grains, beans and pulses.

1 Vegetables, fruit and nuts are high value crops that typically require large inputs of fertilizers and
2 pesticides when produced at a large, commercial scale, and N fertilizer losses can be
3 considerably larger than for grain crops. Having a very diverse diet that includes a wide range of
4 high value fruits and vegetables that are available 365 days a year whether they are in-season
5 locally or not, also have consequences for N inputs/outputs from agriculture--both within the
6 U.S. and globally. Additional Nr may be conserved by decreasing the amount of food that is
7 wasted.

8 *Removing croplands that are susceptible to Nr loss from crop production.* Booth and Campbell
9 (2007)'s model analysis of NO₃⁻ loading in the Mississippi River Basin provides estimates of N
10 input from agricultural lands to be similar to those estimated by Del Grosso et al. (2006). These
11 recommendations are essentially the same as those arrived at in the original national hypoxia
12 assessment which suggested that the most leaky lands be taken out of production (Doering et al.
13 1999). Booth and Campbell state that,

14 *Nitrogen derived from fertilizer runoff in the Mississippi River Basin (MRB) is*
15 *acknowledged as a primary cause of hypoxia in the Gulf of Mexico. To identify*
16 *the location and magnitude of nitrate runoff hotspots, and thus determine where*
17 *increased conservation efforts may best improve water quality, we modeled the*
18 *relationship between nitrogen inputs and spring nitrate loading in watersheds of*
19 *the MRB. Fertilizer runoff was found to account for 59% of loading, atmospheric*
20 *nitrate deposition for 17%, animal waste for 13%, and municipal waste for 11%.*
21 *A nonlinear relationship between nitrate flux and fertilizer N inputs leads the*
22 *model to identify a small but intensively cropped portion of the MRB as*
23 *responsible for most agricultural nitrate runoff. Watersheds of the MRB with the*
24 *highest rates of fertilizer runoff had the lowest amount of land enrolled in federal*
25 *conservation programs. Our analysis suggests that scaling conservation effort in*
26 *proportion to fertilizer use intensity could reduce agricultural nitrogen inputs to*
27 *the Gulf of Mexico, and that the cost of doing so would be well within historic*
28 *levels of federal funding for agriculture. Under this simple scenario, land*
29 *enrolled in conservation programs would be increased by about 2.71 million*
30 *hectares, a 29% increase over 2003 enrollments, while land taken out of*
31 *traditional fertilized agriculture and enrolled in conservation programs would*
32 *constitute about 3% of 2003 fertilized hectares.*

33 *Would increasing conservation to this extent be sufficient to reduce nitrate*
34 *loading and the size of the Gulf hypoxic zone? It has been estimated a 30%*
35 *reduction in total nitrogen inputs would shrink the hypoxic zone by 20-60%,*
36 *though still greater reductions may be required. Our model characterizes nitrate*
37 *loading, not total nitrogen loading, but under our scenario, a 30% reduction in*
38 *total nitrate inputs to the Gulf would require a 50% reduction in agricultural*
39 *loading to aquatic systems."*

40 The latest Gulf of Mexico hypoxia report indicates that an even greater Nr reduction is needed to
41 get appreciable decrease of the hypoxic zone (EPA SAB, 2007a).

42 *Decreasing fertilizer N demand by increasing fertilizer use efficiency in crop and fiber*
43 *production.* The largest input of Nr in North America is N) fertilizer used for crop production.

1 The mean annual N fertilizer input to North America between 1999 and 2003 was 12.5 Tg. Of
2 this fertilizer N, 66% was used to fertilize cereal crops, mainly corn and wheat (Dobermann and
3 Cassman, 2005).

4 Corn yield in the U.S. has increased from an average of 100 bu/ac in 1985 to 136 bu/ac in 2005
5 as a result of improved nutrient and pest management, expansion of irrigated area, conservation
6 tillage, soil testing, and improved crop genetics (yield and pest resistance) [Council for
7 Agricultural Science and Technology (CAST), 2006]. From 1980 to 2000, N-fertilizer use
8 efficiency (NFUE, kg grain produced per kg applied N, hereafter expressed as kg grain / kg N)
9 increased from 42 to 57 kg grain / kg N, a 35% efficiency gain during a period when average
10 U.S. corn yields increased by 40% (Fixen and West, 2002). Despite this steady increase in
11 NFUE, the average N fertilizer uptake efficiency for corn in the north-central U.S. was 37% of
12 applied N in 2000 based on direct field measurements (Cassman et al. 2002). These results
13 indicate that a large majority of the applied N fertilizer is vulnerable to loss pathways such as
14 volatilization, denitrification, runoff, and leaching. The results also suggest there is substantial
15 room for improvement in N efficiency currently achieved by farmers.

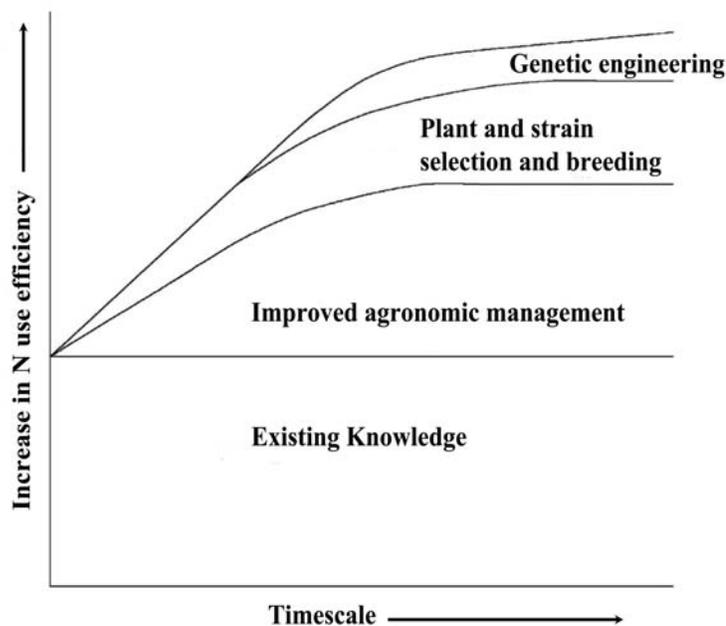
16 Although progress has been made to increase both cereal yield and NFUE, a concerted effort to
17 further increase NFUE remains a logical control point to reduce production costs, because N
18 fertilizer represents a significant input cost, and to limit Nr leakage (e.g. NH₃, NO_x, N₂O, NO₃⁻)
19 from agroecosystems.

20 The goal of reducing Nr while sustaining adequate rates of gain in cereal production to meet
21 expected food demand will require increases in NFUE, which in turn will require innovative
22 crop- and soil management practices. This need is exacerbated by the recent increase in demand
23 for corn to produce ethanol biofuel. The concept of improved N synchrony—practices that better
24 match the amount, timing, and geospatial location of applied N to crop-N demand and the N
25 supply from indigenous soil resources-- is generally viewed as the most appropriate approach for
26 improving NFUE (e.g. Appel, 1994; Cassman et al. 2002). The challenge is for greater
27 synchrony between crop N demand and the N supply from *all sources* (e.g. soil, fertilizer,
28 organic inputs such as manure, compost, or green manures, etc) throughout the growing season.
29 Losses from all N-loss mechanisms increase in proportion to the amount of available N present
30 in the soil profile at any given time.

31 Several promising technologies and combinations of technologies have emerged in recent years.
32 Significant increases in NFUE are often achieved through reductions in N fertilizer use by 10 to
33 30 %, while increases in yield tend to be small (Giller et al. 2004). Figure 39 indicates where
34 expected greatest gains in NFUE are to be realized in the future from different technology
35 options. Each of these improvements in management and genetics helps to better match the
36 amount and timing of applied N to crop-N demand and the N supply from indigenous resources.
37 However, large investments in research, extension education, and technology transfer will be
38 required to achieve the degree of improved synchrony needed to make substantial improvements
39 in NFUE. The need to accelerate the rate of gain in crop yields to meet increasing demand for
40 human food, livestock feed, and biofuels represents an additional new challenge. Crop prices are
41 expected to rise as they more closely track the price of petroleum (CAST, 2006). Higher crop
42 prices will motivate farmers to achieve higher yields, and higher crop yields require a greater
43 amount of N uptake to support increased biomass production (Greenwood et al., 1990).
44 Therefore, an explicit emphasis on developing technologies that contribute to both increasing

1 yields and NFUE will be needed to ensure that the goals of food security, biofuel production, and
2 protection of environmental quality are met.

3 **Figure 39: The likely impact of research investment in increasing N fertilizer use efficiency**
4 **(Giller et al. 2004)**



5
6 *Managing Nr during recycling through livestock production.* Newly fixed Nr is produced
7 biologically or added as fertilizer to meet the demand for food and fiber production. Much of the
8 N is used in cereal crop production and cereal crops are then used to feed livestock. The new Nr
9 is then recycled through the livestock production system and becomes again susceptible to losses
10 to the atmosphere as ammonia and NO_x, is available for additional N₂O production, and
11 movement into aquatic systems as NH₄ and NO₃.

12 The bulk of the N fed to livestock ends up in manure, and where this manure (~ one half in urine
13 and one half in feces) is produced, there is often a much greater supply than can be efficient or
14 economically used as fertilizer on crops. For large animal feeding operations (AFO's) there is
15 considerable expense associated with disposal of the manure. Various storage systems have been
16 developed to deal with this excess manure, the most interesting of which, from the standpoint of
17 integrated policy on N, convert the urea to N₂. These represent a choke point where reactive N is
18 removed, on time scales of millennia, from biogeochemical cycles. The fraction of the feed N
19 that is converted to N₂ or even can be converted to N₂ remain major unanswered scientific or
20 technical questions; this brief report reviews the current state of knowledge.

21 The NRC (2003) report bemoaned the paucity of credible data on the effects of mitigation
22 technology on rates and fates of air emissions from AFO's, but called for their immediate
23 implementation. That report also called for a mass balance approach in which the losses of N

1 species such as NH₃, NO, N₂, and N₂O are expressed as a fraction of the total N loss. Quoting
2 from the NRC report:

3 *Storage covers for slurry storage tanks, anaerobic lagoons, and earthen slurry*
4 *pits are being studied as a method to decrease emissions from those*
5 *containments. Both permeable and impermeable covers are being studied.*
6 *Tested covers range from inexpensive material such as chopped straw (on slurry*
7 *containments only) to more expensive materials such as high density*
8 *polyethylene. Covers can decrease emissions from storage but their net effect on*
9 *emissions from the system is conditional on how the effluent is used on the farm.*

10
11 *Anaerobic digestion in closed containment has been studied for many types of*
12 *applications. Anaerobic digestion is the process that occurs in an anaerobic*
13 *lagoon. When conducted in closed vessels, gaseous emissions including methane,*
14 *carbon dioxide and small amounts of other gasses (possibly ammonia, hydrogen*
15 *sulfide, and VOCs) are captured and can be burned for electricity generation,*
16 *water heating, or simply flared. The in-ground digester being tested on a swine*
17 *farm in North Carolina is an example of the ambient temperature version of this*
18 *technology (there are also mesophilic and thermophilic designs). The*
19 *concentration of ammonia remaining in effluent from that digester is higher than*
20 *the concentration in lagoon effluent and can be volatilized once exposed to air.*
21

22 Recent research (e.g. Shores et al. 2005; Bicudo et al. 2004; Funk et al. 2004a; Funk et al.
23 2004b) demonstrates reduction in NH₃ emissions after a permeable cover was installed. Miner
24 et al. (2003) reported that a polyethylene cover can reduce NH₃ emissions by ~80%, but it is not
25 clear what fraction of that N was converted to N₂. Harper et al. (2000) reported that in a well-
26 managed swine lagoon denitrification N₂ losses can be equivalent to N lost as NH₃, in other
27 words about 50% efficiency. Kermarrec et al. (1998) reported that sawdust litter helps reduce
28 NH₃ emissions from pig manure with 44-74% of manure N converted to N₂, but > 10% of the
29 manure N was released as N₂O. Sommer (1997) cattle and pig slurry tanks NH₃ 3.3 kg N per
30 square meter per year until covered with straw then below detection limit. Mahimairaja et al.
31 (1994) reported that NH₃ volatilization was reduced by 90-95% under anaerobic conditions. See
32 section 3.2 for a discussion of best management practices to minimize NH₃ emissions from
33 livestock waste.

34 *Wetlands to decrease NO₃⁻ loading of aquatic systems.* The 40 to 60% of fertilizer N that is not
35 used by crop production, and an appreciable portion of the N fixed by soybeans, is moved from
36 the crop field into surface and groundwater. Del Grosso et al. (2006) estimate that nationally,
37 30+% as much as the N applied as fertilizer is susceptible to leaching. In soybean production,
38 where little fertilizer N is used, nitrate leaching still poses a significant problem. Del Grosso et
39 al. (2006) estimate that 93% as much nitrate is leached under soybean production as under corn
40 production. Much of the nitrate leached from agricultural fields could be removed from drainage
41 water in wetlands, either natural or reconstructed.

42 Nitrate removal from the water column in wetlands is performed by plant uptake, sequestration
43 in the soils, and microbial transformation that include immobilization and denitrification. Plant
44 uptake and microbiological immobilization result in temporary storages in the system since most

1 nitrogen will eventually return to the wetland via plant death and decomposition. In contrast,
2 denitrification constitutes a real nitrogen sink because in this process bacteria reduce NO_3^- to
3 nitrogenous gases (N_2 , NO , N_2O) that are emitted to the atmosphere (Clement et al., 2002). In
4 general, NO_3^- removal by wetlands, primarily caused by microbial denitrification, varies
5 seasonally, with highest rates during summer and lowest rates during the coldest temperatures
6 (Mitsch et al., 2000; Spieles and Mitsch, 2000; Hernandez and Mitsch, 2007). Hernandez and
7 Mitsch (2007) found that permanently flooded wetlands had lower $\text{N}_2\text{O}/\text{N}_2$ ratios of emissions
8 than did intermittently flooded wetlands. They also found that the ratio was higher in the cold
9 months even though the flux rates are much lower then. A full risk assessment needs to be made
10 to determine how much pollutant swapping, i.e., exchanging NO_3^- for N_2O is advisable.

11 In addition to preserving existing wetlands there are two basic approaches utilizing wetlands for
12 reducing the N and other nutrients from reaching rivers and streams and especially vulnerable
13 downstream coastal systems: 1) creation and restoration of ecosystems, principally wetlands and
14 riparian forests, between farms and adjacent ditches, streams and rivers; and 2) diversion of
15 rivers into adjacent constructed and restored wetlands all along the river courses (See Chapter 4).

16 At a series of workshops on restoration of the Mississippi-Ohio-Missouri (MOM) River Basin in
17 2003-04 (Day et al., 2005; Mitsch and Day, 2006), scientists and managers were asked to focus
18 on needed research and chokepoint opportunities, especially for managing N in that basin. They
19 concluded that a major, interdisciplinary research program, as a lead-in to the actual restoration
20 of wetlands and rivers, needs to take place with sufficient funding, study sites, and time to reduce
21 remaining uncertainties about the efficacy of wetlands to solve pollution problems related to N.
22 Twenty to thirty full-scale, existing and new agricultural/wetland demonstration projects should
23 be located throughout the country and instrumented to study agricultural runoff into wetlands in
24 a variety of soil conditions. Pilot and full-scale studies are needed of diversions into riparian
25 systems along river channels to determine their effectiveness for nutrient removal.

26 To give scale the solution needed, restoration of over 2 million hectares of wetlands is needed in
27 the MOM basin to reduce the nitrogen load to the Gulf of Mexico sufficiently to ensure a
28 reduction in the size of the hypoxia (Mitsch et al., 2001; Mitsch and Day, 2006; see Chapter 4).
29 If wetlands could be economically and effectively restored where croplands now exist on hydric
30 soils within the 100-year floodplain, returning croplands that are on hydric soils may be an
31 important NO_3^- control mechanism. Cropland on hydric soil in the floodplain occupy about 2.8
32 million hectare, 40% more than is needed for the restoration. If this area and its wetlands were
33 given back to the Mississippi, over a million tons of NO_3^- -N would be annually removed or
34 prevented from reaching the Gulf of Mexico (Hey et al. 2004).

35 Given the interactions among oxidized and reduced N species, it is important to recognize the
36 potential for unintended consequences to occur as a result of strategies aimed at limiting one
37 form of Nr in air or water that can lead to the increased production of other forms of Nr. One
38 such instance is the potential offsetting of the benefits of NO_3^- remediation at the expense of
39 increasing input of N_2O to the atmosphere (See section 2.4.7.3).

40 3.3.4.2. *Technical controls (control points) on transfer and transformations of Nr in and between*
41 *environmental systems: NO_x*

42 A major contributor to Nr in the atmosphere is fossil fuel combustion. During the combustion
43 process NO_x ($\text{NO}_x = \text{NO} + \text{NO}_2$) are released to the atmosphere. Globally the production of

1 NO_x has accelerated the last few decades through, primarily the increase in fossil fuel
2 combustion (Galloway et al., 1995; 2008). With this increase in emissions from ~5 Tg N in 1940
3 to ~ 25 Tg N in 2005, combustion of fossil fuels account for about 50% of the total global NO_x
4 emissions for 1990. Of the anthropogenic sources, fossil fuel, aircraft, biomass burning, and part
5 of the soil emission are most important (Holland et al., 1997). Although global NO_x emissions
6 continue to increase, these emissions are declining in the US. (see section 3.3.1).

7 Nitrogen oxide is formed during combustion by three mechanisms:

- 8 • thermal NO_x where N and oxygen (O₂) gas, present normally in combustion air, combine
9 at high temperatures, usually above 1600 C to form NO through the Zeldovich
10 mechanism.
- 11 • fuel NO_x where nitrogen from a fuel, e.g., coal and biofuels, is released as some
12 intermediate and then combines with O₂ to form NO, and
- 13 • prompt NO_x where nitrogen gas combines with radical components of the fuel, forming
14 various compounds including hydrogen cyanide and other cyano radicals. These in turn
15 form NO_x. Contributions of prompt NO_x are usually low as compared to fuel NO_x.
16

17 There are several ways to control NO_x. The most common controls are on coal-fired electric
18 utility generators and those are discussed below. Following electric utility generator controls, or
19 external combustion systems, there is a discussion on internal combustion controls.

20 Reduction of the temperature limits the kinetics of the N/ O₂ reaction. Temperature can be
21 controlled by using a fuel-rich mixture versus fuel lean. In this case the reactions to take place at
22 lower temperatures. Fuel-rich mixtures also reduce the amount of O₂ available for reaction and
23 there are changes to the chemical mechanisms which limit the oxidation of N₂. If fuel-lean
24 mixtures are used for temperature control, while the temperature is lower, there is a significant
25 amount of O₂ present. Typically in external combustion systems, this is implemented by using
26 less excess air and using staged combustion. In addition, flue-gas recirculation (FGR) is used to
27 lower the temperature. Low-NO_x burners operate under the principle of internally staging the
28 combustion. To reduce fuel NO_x, air and fuel staging are used to reduce the peak temperature
29 where air and fuel are admitted in separate locations.

30 Chemical reduction of NO_x is also possible. These methods include: selective non-catalytic
31 reduction (SNCR); SCR; and fuel reburning. SNCR is an add-on technology where urea or NH₃
32 is injected in a controlled temperature zone to allow for the reduction of NO_x. SCR is also an
33 add-on technology where the flue gas must pass through a catalyst bed to allow for reaction
34 between ammonia and NO_x. Care must be taken with both technologies to avoid NH₃ slip. Fuel
35 reburning requires the injection of a fuel to create a zone where NO_x is reduced to N₂. Low NO_x
36 burners may also use an internal fuel reburning to reduce the NO_x.

37 For internal combustion engines, the same mechanisms as discussed above are used but in a
38 variety of different ways, since these systems are using high pressure and predominately have
39 thermal NO_x versus fuel NO_x formation. Most technologies involve the need to reduce the peak
40 temperature and duration of high temperatures of the combustion zone. For example, gas
41 turbines utilize low NO_x burners, while spark ignition engines utilize a three-way catalyst which
42 requires less than 0.5% O₂. In this case, additional NO_x is reduced by utilizing unburned fuel as

1 a reagent over the catalyst for chemical reduction of NO_x. It should be noted however, that a
2 side reaction for the three-way catalyst system is ammonia. For diesel engines, delaying the
3 injection of the fuel, and for spark ignited engines retarding the timing can reduce NO_x
4 emissions. Engines also use exhaust gas recirculation (EGR) to reduce the peak temperatures.
5 Recent road side studies have indicated high efficiency (~90%) for NO_x removal from the
6 American light-duty fleet [Bishop and Stedman, 2008].

7 **3.4 Risk reduction recommendations**

8 **3.4.1 Overarching recommendations**

9 Human activities have significantly increased the introduction of Nr into the U.S. environment,
10 and, while there have been significant benefits resulting from food production, there have also
11 been, and continue to be, major risks to the health of both ecosystems and people due to the
12 introduction of Nr into the nitrogen cascade. To optimize the benefits of Nr, and to minimize its
13 impacts, will require an integrated nitrogen management strategy that not only involves EPA, but
14 also coordination with other federal agencies, the States, the private sector, and a strong public
15 outreach program. The committee understands that there are real economic costs to the
16 recommendations contained in this report. For each recommendation there will of necessity be
17 tradeoffs derived from the varying cost-effectiveness of different strategies.

18 The committee makes three over-arching recommendations:

19 **Recommendation A**

20 *EPA should pursue an integrated multi medium approach to develop the scientific*
21 *understanding necessary for science-based policies, regulations, and incentives by which*
22 *to decrease the serious adverse impacts of excess Nr on terrestrial and aquatic*
23 *ecosystems, human health, and climate change. Such integration must cut across media*
24 *(air, land, and water), multiple chemical forms of Nr (including chemically oxidized,*
25 *chemically reduced, and organic forms), many different federal, state and local*
26 *government agencies, and private sector organization, and legislative statutes including*
27 *the Clean air Act (CAA), Clean Water Act (CWA), and the Energy Independence and*
28 *Security Act (EISA).*

30 **Recommendation B**

31 *EPA should form an Intra-agency Nr Management Task Force that will build on existing*
32 *Nr research and management capabilities within the Agency. This Intra-Agency Task*
33 *Force should be aimed at increasing scientific understanding of: 1) Nr impacts on*
34 *terrestrial and aquatic ecosystems, human health, and climate, 2) Nr-relevant monitoring*
35 *requirements, and 3) the most efficient and cost-effective means by which to decrease*
36 *various adverse impacts of Nr loads as they cascade through the environment.*

38 **Recommendation C**

39 *EPA should join with other agencies within the U.S. government in establishing an Inter-*
40 *agency Nr Management Task Force. The members of this Inter-Agency Task Force*
41 *should include at least the following federal agencies: U.S. Department of Agriculture*
42 *(USDA), U.S. Department of Energy (DOE), U.S. Department of Transportation (DOT),*

1 *National Oceanic and Atmospheric Administration (NOAA), and U.S. Geological Survey*
2 *(USGS). This Task Force would coordinate federal programs that address Nr concerns*
3 *and help ensure clear responsibilities for monitoring, modeling, researching, and*
4 *managing Nr in the environment.*

5 The intra- and inter-agency Nr-Management Task Forces should take a systems approach to both
6 scientific research and public policy by emphasizing the following research and management
7 goals:

8 The intra- and inter-agency Nr-Management Task Forces should take a systems approach to
9 research, monitoring, and evaluation in the following areas to inform public policy related to Nr
10 management:

- 11 • Development of methods to help implement a systems approach
 - 12 ○ developing and evaluating proposed Nr budgets
 - 13 ○ developing appropriate life cycle accounting methods
 - 14 ○ developing monitoring as the basis for informed policies, regulations, and
 - 15 incentive frameworks for addressing excess Nr loads
 - 16 ○ evaluating the critical loads approach to air and water quality management
 - 17 ○ developing Nr indicators for excess Nr effects on human health and environment
 - 18 ○ developing new systems-based approaches for controlling NR releases to the
 - 19 environment
- 20 • Best management practices (BMPs)
 - 21 ○ developing the scientific understanding required for identifying best management
 - 22 practices (BMPs) for
 - 23 ■ Nr applications in agriculture to ensure adequate food, feed, fiber, and
 - 24 bioenergy feedstock supply while also avoiding negative impacts on the
 - 25 environment and human health;
 - 26 ■ Nr applications for residential and commercial landscape maintenance;
 - 27 ○ establishing proactive extension and technology transfer approaches to facilitate
 - 28 adoption of BMPs;
- 29 • Assessment activities
 - 30 ○ assessing combined carbon (C) and Nr effects on terrestrial and aquatic
 - 31 ecosystems
 - 32 ○ assessing indicators/endpoints, costs, benefits and risks associated with
 - 33 impairment of human health and decline and restoration of ecosystem services

- 1 ○ reviewing existing and proposed legislation for purposes of extending Nr
2 regulatory authority or streamlining procedures for enacting Nr risk reduction
3 strategies
- 4 ○ evaluating economic incentives, particularly those that integrate air, aquatic, and
5 land sources of excess Nr
- 6 • Developing new education, outreach, and communication initiatives

7 **3.4.2 Near-term target recommendations**

8
9 INC makes four recommendations that set near-term targets for the decrease of Nr entering the
10 environment from various sources. These, and their rationale, are set forth below.

11 **Target Goal 1. Controls on NO_x emissions from mobile and stationary sources**

12
13 The Clean Air Act (1970) and its Amendment (1990) have resulted in NO_x emissions that are
14 less than 50 percent of what they would have been without existing controls. While this is an
15 admirable accomplishment, there is still a need to seek improvements. NO_x emissions are an
16 order of magnitude greater than at the beginning of the 20th century. As a consequence there
17 remain significant negative impacts on both humans and ecosystems. In 2002, coal-fired utilities
18 generated approximately 1.3 Tg N annually. If all coal-fired plants used state-of-the-art NO_x
19 controls, this number could be reduced by 0.6 Tg N/yr; in fact the NO_x State Implementation
20 Plans enacted in 2003 and 2004 reduced 2002 emissions by 0.3 Tg N/yr, so in essence, half the
21 reduction has already been accomplished. The EPA should continue to reduce NO_x emissions
22 from major point sources, including electric generating stations and industrial sources, expanding
23 the use of market mechanisms such as cap and trade. Under this scenario, it is likely that high
24 efficiency, low emission power plants will be built for energy needs.

25 For mobile sources, emissions for highway and off-highway sources are approximately 2.2 Tg
26 N/yr and 1.2 Tg N/yr, respectively. For on road vehicles, better controls for heavy duty diesel
27 vehicles are needed. For off-road vehicles, which include locomotives, construction, farm,
28 landscaping equipment, and marine vehicles, there are currently no controls, but 80-90% NO_x
29 removal is technically achievable. Assuming a 40% reduction for these sources, there is a
30 potential reduction of 1.4 Tg. The total reduction for both mobile and stationary sources is then
31 approximately 2 Tg N/yr. Part of achieving such levels of compliance will require the
32 implementation of inspection and maintenance programs or road-side monitoring.

33 INC cautions, however, that achieving such a goal may be inadequate for many areas to meet the
34 new 65 ppb ozone standard recommended by the CASAC or even the 75 ppb currently
35 promulgated. Additional measures such as increasing the role of solar- and wind-generated
36 electricity, wider use of hybrid and electric cars, and public transit conducive to energy
37 conservation and reduced emissions must be promoted.

38 **Target Recommendation 1. (1)** *INC recommends that the EPA expand its NO_x control*
39 *efforts from the current decreases of emissions of passenger cars and power plants to include*
40 *other important unregulated mobile and stationary sources sufficient to achieve a 2.0 Tg N/yr*
41 *decrease in the generation of reactive nitrogen.*

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Target Goal 2. Nr discharges and emissions from agricultural lands

INC finds that excess flows of Nr into streams, rivers, and coastal systems can be reduced by approximately 20% (~1 Tg N/yr) through improved methods of landscape management and without undue disruption to agricultural production. This would include activities such as using wetland management (e.g., USDA Wetlands Protection Program), improved tile-drainage systems and riparian buffers on crop land, and implementing storm water and nonpoint source management practices (e.g., EPA permitting and funding programs).

In addition, INC believes that crop N-uptake efficiencies can be increased by up to 25% over current levels through a combination of knowledge-based practices and advances in fertilizer technology (such as controlled release and inhibition of nitrification). Crop output can be increased while reducing total Nr by up to 20% of applied synthetic fertilizers, approximately 2.4 Tg N/yr below current levels of Nr additions to the environment. These are appropriate targets with today’s available technologies. Further progress is possible through expanded research programs.

INC is concerned about current policies and practices governing biofuel development. Acreage devoted to corn production has increased substantially for corn based ethanol production during the past several years (with nearly one-third of the crop currently devoted to bioethanol production), with fertilizer nitrogen increasing by at least 10% (an additional 0.5 Tg N/yr), largely to meet biofuel feedstock crop demand. In the absence of Nr controls and a failure to implement best practices, current biofuels policies will make it extremely difficult to reduce Nr losses to soils, water and air (Simpson et al. 2008). Integrated management strategies will be required.

INC also notes with concern the increase of N₂O in the atmosphere. INC believes that greenhouse gas (GHG) emissions trading will provide both opportunities and challenges for mitigating Nr environmental and health impacts. Policies and regulations must consider how to reward reductions of N-related GHG. Biofuel subsidies that accurately account for Nr contributions to GHG emissions, certification of individual biofuel plants for GHG impact, and rewards for farmers who reduce N₂O emissions are examples of how an integrated strategy can reduce agricultural GHG impacts. For additional production of liquid biofuels beyond the grandfathered amount in the Energy Independence and Security Act (EISA), EPA has the power to exercise some controls on N₂O emissions through the life cycle greenhouse gas accounting requirements. In this regard, the committee endorses Section 204 of the EISA calling on the Agency to adopt a life cycle approach to the assessment of future renewable fuel standards as a positive step toward a comprehensive analysis.

Target recommendation 2. *INC recommends a goal of decreasing livestock-derived NH₃ emissions by 30% (a decrease of 0.5 Tg N/yr) by a combination of BMPs and engineered solutions. This is expected to decrease PM_{2.5} by ~0.3 µg/m³ (2.5%), and improve health of ecosystems by achieving progress towards critical load recommendations. Additionally we recommend decreasing NH₃ emissions derived from fertilizer applications by 20% (decrease by ~0.2 Tg N/yr), through the use of NH₃ treatment systems and BMPs.*

1 **Target Goal 3. Ammonia emissions from livestock management and manure handling**

2 In spite of gains made over the last several decades in decreasing the amount of NOx emitted
 3 from stationary and mobile combustion sources, the total amount of Nr released into the
 4 atmosphere has remained relatively constant. This is related to the essentially unregulated release
 5 of ammonia from livestock operations. At the present time, fewer livestock are required to
 6 produce more animal products than in the past. For example, since 1975 milk production has
 7 increased linearly at the rate of ~ 180 kg milk per cow /yr while milk cow herd population
 8 decreased at the rate of ~69,000 head per yr, i.e. the 60% greater amount of milk produced in
 9 2006 compared to 1970 required 25% fewer cows. Animal inventories declined by 10% for beef
 10 brood cows from 36 million head in 1970 to 33 million head in 2006, and the inventory of
 11 breeder pigs and market hogs declined 8% from 673 million head to 625 million head in the
 12 same period, even with similar or greater annual meat production. These trends resulted from
 13 greater growth rates of animals producing more meat in a shorter amount of time. In 1970,
 14 broilers were slaughtered after 80 days on feed at 1.7 kg live weight, but by 2006 the average
 15 weight was 2.5 kg after only 44 days on feed. These trends are in requiring fewer animals to
 16 produce more animal food products through improved diet and increased production efficiency
 17 will continue.

18
 19 Implementation of improved methods of livestock management and manure handling and
 20 treatment to decrease NH₃ emissions that have been developed since 1990 and will further
 21 decrease ammonia and other gases and odor emissions. For example, sawdust litter helps
 22 decrease NH₃ emissions from pig manure with 44-74% of manure N converted to N₂. Storage
 23 covers for slurry storage tanks, anaerobic lagoons, and earthen slurry pits decrease emissions
 24 from those containments. Anaerobic digestion in closed containment has been studied for many
 25 types of applications. Recent research demonstrates reduction in NH₃ emissions after a
 26 permeable cover was installed, e.g a polyethylene cover decreased NH₃ emissions by ~80%. A
 27 well managed swine lagoon can denitrify approximately 50% of the excreted N to N₂. Recently
 28 engineered developments utilizing closed loop systems (Aneja et al. 2008) substantially reduce
 29 atmospheric emissions of ammonia (> 95%) and odor at hog facilities.

30
 31 **Table 27: Estimates for potential decreases in NH₃ emissions from livestock manure in the**
 32 **U.S. (estimate is based on livestock emissions of 1.6 Tg from Table 1).**

NH ₃ Source	% of Total NH ₃	Tg NH ₃ -N/yr emitted	Estimated Decrease of NH ₃	
			%	Tg N/yr
Dairy	23.1	0.37	10	0.040
Beef	27.1	0.44	10	0.040
Poultry	27.5	0.44	50	0.220
Swine	17.5	0.28	50	0.140
Goat/sheep	1.6	0.03	10	0.003
Horse	2.9	0.05	10	0.005
Total	100.0	1.61		0.450

33
 34 **Target Recommendation 3.** *INC recommends that excess flows of Nr into streams, rivers, and*
 35 *coastal systems be decreased by approximately 20% (~1 Tg N/yr) through improved landscape*

1 *management and without undue disruption to agricultural production. This would include*
2 *activities such as using wetland management (e.g., USDA Wetlands Protection Program),*
3 *improved tile-drainage systems and riparian buffers on crop land, and implementing storm*
4 *water and non-point source management practices (e.g., EPA permitting and funding programs).*
5 *In addition, the committee recommends that crop N-uptake efficiencies be increased by up to*
6 *25% over current practices through a combination of knowledge-based practices and advances*
7 *in fertilizer technology (such as controlled release and inhibition of nitrification). Crop output*
8 *can be increased while decreasing total Nr by up to 20% of applied artificial Nr, amounting to*
9 *~2.4 Tg N/yr below current amounts of Nr additions to the environment. These are appropriate*
10 *targets with today's available technologies and further progress is possible.*

12 **Target Goal 4. Discharge of Nr from point sources**

13 National loadings of Nr to the environment from public and private wastewater point sources are
14 relatively modest in comparison with global Nr releases, however they can be important local
15 sources with associated impacts. There are two funding sources of significance authorized in the
16 CWA that are used to fund projects relevant to the control of Nr. Section 319 establishes state
17 nonpoint source management programs to plan for and implement management measures that
18 abate sources of nonpoint pollution from eight source categories, including both urban and
19 agricultural sources. Over the years section 319 has made available, through 60% matching
20 funds, over \$1.6 billion in assistance. The much larger source of funding comes under Title VI of
21 the CWA, which has provided over \$24 billion (federal) for the construction of treatment
22 facilities for point sources of wastewater over the past twenty years, although only a fraction of
23 this amount has been dedicated to denitrification processes. These programs have been, and
24 continue to be, important ways of managing Nr in the urban environment. In most cases Nr
25 ultimately finds its way into municipal and private sewers and treatment systems where,
26 irrespective of its initial chemical form, it is partially or completely nitrified. Subsequent
27 engineered complete denitrification processes (including tertiary wastewater treatment,
28 engineered or restored wetlands, and algae production for biofuels) can convert the nitrate to N₂.
29 Federal and State assistance programs directed at construction of treatment plants are an
30 important element Nr control policy in the US.

31
32 **Target Recommendation 4. (4)** *INC recommends that a high priority be assigned to*
33 *nutrient management through a targeted construction grants program under the CWA. This will*
34 *decrease Nr emissions by between 0.5 and 0.8 Tg N/yr.*
35

36 **3.4.3 Summary statement**

37 The committee's recommendations, if implemented, would reduce total Nr loadings to the
38 environment in the U.S. by approximately 25% below current levels. The committee believes
39 that these represent realistic near-term targets based on current technology, however further
40 reductions are needed for many N-sensitive ecosystems and to ensure that health-related
41 standards are maintained. Achieving and going beyond these recommended Nr reduction targets
42 are critical given the growing demand for food- and fiber-production and energy use from
43 population pressure and economic growth.

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Appendix 1: Key to chemical abbreviations

- AFO – Animal feeding operations
- C - Carbon
- CFC – Chlorofluorocarbon
- DIN – Dissolved inorganic nitrogen
- DO – Dissolved Oxygen
- Fe - Iron
- HNO₃ – Nitric Acid
- HONO –Nitrous Acid
- N – Nitrogen
- N₂ –Diatomic nitrogen
- N₂O – Nitrous oxide,
- N₂O₅ – Dinitrogen Pentoxide
- NH₃ – Ammonia
- NH₄⁺ – Ammonium
- NH_x – NH₃ + NH₄⁺
- NO – Nitric Oxide
- NO₂ – Nitrogen Dioxide
- NO₃⁻ – Nitrate ion
- NO₃ – Nitrate radical,
- Norg – Organic Nitrogen
- NO_x – Nitrogen Oxides (NO + NO₂)
- NO_y– (NO, NO₂, NO₃, N₂O₅, HONO, HNO₃, NO₃⁻, PAN and other organo-nitrates, RONO₂)
- Nr – Reactive Nitrogen
- O₂ – Oxygen
- OH – Hydroxyl radical
- P – Phosphorus

- 1 PAN– Polyacrylonitrile
- 2 PM – Particulate Matter
- 3 PM_{2.5} – Particulate Matter less than 2.5 microns in diameter
- 4 PM₁₀ – Particulate Matter less than 10 microns in diameter
- 5 RONO₂ – Organic Nitrates
- 6 Si – Silicon
- 7 SO₂ – Sulfur dioxide
- 8 SO₄²⁻ – Sulfate
- 9 TAN – Total ammonical nitrogen

Appendix 2: Acronyms and abbreviations

- 1
- 2
- 3 AAPFCO – Association of American Plant Food Control Officials)
- 4 AFO – Animal Feeding Operation
- 5 AIRMON – Atmospheric and Integrated Research Monitoring Network
- 6 AOB – Ammonia Oxidizing Bacteria
- 7 BL – Boundary layer
- 8 BMP – Best Management Practice
- 9 BNF– Biological Nitrogen Fixation
- 10 BNR – Biological Nutrient (or Nitrogen) Removal
- 11 CAA – Clean Air Act
- 12 CAFO – Concentrated Animal Feeding Operation
- 13 CAIR – Clean Air Interstate Rule (
- 14 CALM – Consolidated Assessment and Listing Methodology
- 15 CAST – Council for Agricultural Science and Technology
- 16 CASTNET – Clean Air Standards and Trends Network
- 17 C-BNF – Cultivation-induced biological nitrogen fixation ()
- 18 CFC – Chlorofluorocarbon
- 19 CFR – Code of Federal Regulations
- 20 CL – Critical load
- 21 CLAD – Critical Loads Ad-Hoc Committee
- 22 CMAQ – Community Multiscale Air Quality
- 23 DRP – Conservation Reserve Program
- 24 CSO – Combined sewer overflow
- 25 CTM – Chemical Transport Models
- 26 CWA – Clean Water Act
- 27 DIN – Dissolved Inorganic Nitrogen
- 28 DO – Dissolved Oxygen
- 29 DOE – U.S. Department of Energy

- 1 DOT – U.S. Department of Transportation
- 2 ECU – Electricity generating units
- 3 EFD – Essential Facilities Doctrine
- 4 EGR – Exhaust gas recirculation
- 5 EISA – Energy Independence and Security Act
- 6 EPA – United States Environmental Protection Agency
- 7 EQIP - Environmental Quality Incentives
- 8 EU – European Union
- 9 FAO – Food and Agricultural Organization of the United Nations
- 10 FAOSTAT – Food and Agricultural Organization Statistical Database
- 11 FGR – Flue-gas recirculation (FGR)
- 12 ha – Hectare
- 13 GHG – Greenhouse Gas
- 14 GPS – Geographic Positioning System
- 15 HAB – Harmful Algal Bloom
- 16 IPCC – Intergovernmental Panel on Climate Change
- 17 ISA – Integrated Science Assessments
- 18 ITQ - Individual Transferable Quota
- 19 kg – Kilogram
- 20 L - Liter
- 21 LA – Load Allocation
- 22 LISS – Long Island Sound Study
- 23 mg - Milligrams
- 24 MGD – Million Gallons per Day
- 25 Mmt – Million metric tons
- 26 MT - metric tons
- 27 MOM – Mississippi-Ohio-Missouri
- 28 MRB – Mississippi River Basin
- 29 MS4 – Municipal Separate Storm Sewer System
- 30 NAAQS – National Ambient Air Quality Standards

- 1 NADP – National Atmospheric Deposition Program
- 2 NASS – National Agricultural Statistics Service Information
- 3 NCA – National Coastal Assessment
- 4 NCE – Nitrogen Credit Exchange
- 5 NCCR – National Coastal Condition Report
- 6 NEEA – National Estuarine Eutrophication Assessment
- 7 NESCAUM – Northeast States for Coordinated Air Use Management
- 8 NFUE - Nitrogen Fertilizer Use Efficiency
- 9 NMP – Nutrient Management Plan
- 10 NOAA – National Oceanic and Atmospheric Administration
- 11 NPS – Nonpoint Source
- 12 NRC – National Research Council
- 13 NRCS – Natural Resources Conservation Service
- 14 NRD – Natural Resource District
- 15 NRI –National Resources Inventory
- 16 NTN – National Trends Network
- 17 OTAG – Ozone Transport Assessment Group
- 18 OTC – Ozone Transport Commission
- 19 PE – Physiological Efficiency with which the N taken up by the crop is used to produce
20 economic yield such as grain or fruit
- 21 PFP – Partial Factor Productivity
- 22 POTW – Publicly Owned Treatment Works
- 23 PSD – Prevention of Significant Deterioration
- 24 RE –Recovery Efficiency (kg N uptake per kg N applied)]
- 25 SAV – Submerged Aquatic Vegetation
- 26 SNCR – Selective non-catalytic
- 27 SCR – Selective Catalytic Reduction
- 28 SIP – State Implementation Plan
- 29 SOM – Soil organic matter
- 30 SPATIally Referenced Regressions On Watershed Attributes Model – SPARROW

- 1 STP – Sewage Treatment Plant
- 2 SW – Storm Water
- 3 SWAT – Storm Water Assessment Tool
- 4 SWPPP – Stormwater Pollution Prevention Plan
- 5 T – Temperature
- 6 Tg – Teragram (million metric tons or 10^{12} grams)
- 7 TMDL – Total Maximum Daily Load
- 8 UFTRS – Uniform Fertilizer Tonnage Reporting System
- 9 UNECE – United Nations Economic Commission for Europe
- 10 US – United States of America
- 11 USDA – U.S. Department of Agriculture
- 12 USGS – U.S. Geological Survey
- 13 USEPA – United States Environmental Protection Agency
- 14 WHO – World Health Organization
- 15 WLA – Wasteload Allocation
- 16 WPCA – Water Pollution Control Authorities
- 17 WRI – World Resources Institute
- 18 WRP – Wetland Reserve Program
- 19 WSA – Wadeable Stream Assessment

1 **Appendix 3: Findings and Recommendations of the Integrated Nitrogen Committee**

2 **1. Introduction**

3 This appendix contains a compilation of all the Findings and Recommendations of the
4 Integrated Nitrogen Committee. Following a listing of the four overarching
5 recommendations, the more specific recommendations are listed with appropriate section
6 headings.

7 **2. Overarching Recommendations**

8 **Recommendation A**

9 *EPA should pursue an integrated multi medium approach to develop the scientific*
10 *understanding necessary for science-based policies, regulations, and incentives*
11 *by which to decrease the serious adverse impacts of excess Nr on terrestrial and*
12 *aquatic ecosystems, human health, and climate change. Such integration must cut*
13 *across media (air, land, and water), multiple chemical forms of Nr (including*
14 *chemically oxidized, chemically reduced, and organic forms), many different*
15 *federal, state and local government agencies, and private sector organization,*
16 *and legislative statutes including the Clean air Act (CAA), Clean Water Act*
17 *(CWA), and the Energy Independence and Security Act (EISA).*

18
19 **Recommendation B**

20 *EPA should form an Intra-agency Nr Management Task Force that will build on*
21 *existing Nr research and management capabilities within the Agency. This Intra-*
22 *Agency Task Force should be aimed at increasing scientific understanding of: 1)*
23 *Nr impacts on terrestrial and aquatic ecosystems, human health, and climate,2)*
24 *Nr-relevant monitoring requirements, and 3) the most efficient and cost-effective*
25 *means by which to decrease various adverse impacts of Nr loads as they cascade*
26 *through the environment.*

27
28 **Recommendation C**

29 *EPA should join with other agencies within the U.S. government in establishing*
30 *an Inter-agency Nr Management Task Force. The members of this Inter-Agency*
31 *Task Force should include at least the following federal agencies: U.S.*
32 *Department of Agriculture (USDA), U.S. Department of Energy (DOE), U.S.*
33 *Department of Transportation (DOT), National Oceanic and Atmospheric*
34 *Administration (NOAA), and U.S. Geological Survey (USGS). This Task Force*
35 *should coordinate federal programs that address Nr concerns and help ensure*
36 *clear responsibilities for monitoring, modeling, researching, and managing Nr in*
37 *the environment.*

1 The intra- and inter-agency Nr-Management Task Forces should take a systems approach
2 to research, monitoring, and evaluation in the following areas to inform public policy
3 related to Nr management:

- 4 • Development of methods to help implement a systems approach
 - 5 ○ developing and evaluating proposed Nr budgets
 - 6 ○ developing appropriate life cycle accounting methods
 - 7 ○ developing monitoring as the basis for informed policies, regulations, and
8 incentive frameworks for addressing excess Nr loads
 - 9 ○ evaluating the critical loads approach to air and water quality management
 - 10 ○ developing Nr indicators for excess Nr effects on human health and
11 environment
 - 12 ○ developing new systems-based approaches for controlling NR releases to
13 the environment
- 14 • Best management practices (BMPs)
 - 15 ○ developing the scientific understanding required for identifying best
16 management practices (BMPs) for
 - 17 ■ Nr applications in agriculture to ensure adequate food, feed, fiber,
18 and bioenergy feedstock supply while also avoiding negative
19 impacts on the environment and human health;
 - 20 ■ Nr applications for residential and commercial landscape
21 maintenance;
 - 22 ○ establishing proactive extension and technology transfer approaches to
23 facilitate adoption of BMPs;
- 24 • Assessment activities
 - 25 ○ assessing combined carbon (C) and Nr effects on terrestrial and aquatic
26 ecosystems
 - 27 ○ assessing indicators/endpoints, costs, benefits and risks associated with
28 impairment of human health and decline and restoration of ecosystem
29 services
 - 30 ○ reviewing existing and proposed legislation for purposes of extending Nr
31 regulatory authority or streamlining procedures for enacting Nr risk
32 reduction strategies
 - 33 ○ evaluating economic incentives, particularly those that integrate air,
34 aquatic, and land sources of excess Nr

- Developing new education, outreach, and communication initiatives

3. Near-term target recommendations

In addition, INC makes four recommendations that set near-term targets for the decrease of Nr entering the environment from various sources.

(1) *INC recommends that the EPA expand its NO_x control efforts from the current decreases of emissions of passenger cars and power plants to include other important unregulated mobile and stationary sources sufficient to achieve a **2.0 Tg N/yr** decrease in the generation of reactive nitrogen.*

(2) *INC recommends a goal of decreasing livestock-derived NH₃ emissions by 30% (a decrease of **0.5 Tg N/yr**) by a combination of BMPs and engineered solutions. This is expected to decrease PM_{2.5} by ~0.3 µg/m³ (2.5%), and improve health of ecosystems by achieving progress towards critical load recommendations. Additionally we recommend decreasing NH₃ emissions derived from fertilizer applications by 20% (decrease by ~**0.2 Tg N/yr**), through the use of NH₃ treatment systems and BMPs.*

(3) *INC recommends that excess flows of Nr into streams, rivers, and coastal systems be decreased by approximately 20% (~**1 Tg N/yr**) through improved landscape management and without undue disruption to agricultural production. This would include activities such as using wetland management (e.g., USDA Wetlands Protection Program), improved tile-drainage systems and riparian buffers on crop land, and implementing storm water and non-point source management practices (e.g., EPA permitting and funding programs). In addition, the committee recommends that crop N-uptake efficiencies be increased by up to 25% over current practices through a combination of knowledge-based practices and advances in fertilizer technology (such as controlled release and inhibition of nitrification). Crop output can be increased while decreasing total Nr by up to 20% of applied artificial Nr, amounting to ~**2.4 Tg N/yr** below current amounts of Nr additions to the environment. These are appropriate targets with today's available technologies and further progress is possible.*

(4) *INC recommends that a high priority be assigned to nutrient management through a targeted construction grants program under the CWA. This will decrease Nr emissions by between **0.5 and 0.8 Tg N/yr**.*

Implementing these recommendations would decrease the introduction of Nr into the U.S. by about 25%, which would then decrease the amount of Nr lost to the atmosphere, soils and waters.

1 **4. Specific findings and recommendations**

2 **Finding 1**

3 Crop agriculture receives 63% of U.S. annual new Nr inputs from anthropogenic sources
4 (9.8 Tg from N fertilizer, 7.7 from crop BNF versus 29 Tg total) and accounts for 58%
5 (7.6 Tg) of total U.S. Nr losses from terrestrial systems to air and aquatic ecosystems, yet
6 current monitoring of fertilizer use statistics by federal agencies is inadequate to
7 accurately track trends in quantities and fate of N applied to major crops and the
8 geospatial pattern by major watersheds.

9 **Recommendation 1:** *Increase the specificity and regularity of data acquisition for*
10 *fertilizer application to major agricultural crops (and also for urban residential and*
11 *recreational turf) by county (or watershed) to better inform decision-making about*
12 *policies and mitigation options for reducing Nr load in these systems, and to facilitate*
13 *monitoring and evaluation of impact from implemented policies and mitigation efforts.*

14 **Finding 2**

15 Nr inputs to crop systems are critical to sustain crop productivity and soil quality.
16 Moreover, given limited land and water resources, global population growth and rapid
17 economic development in the world's most populous countries, the challenge is to
18 accelerate increases in crop yields on existing farm land while also achieving a
19 substantial increase in N fertilizer uptake efficiency. This process is called "ecological
20 intensification" because it recognizes the need to meet future food, feed, fiber and energy
21 demand of a growing human population while also protecting environmental quality and
22 ecosystem services for future generations (Cassman, 1999). More diverse cropping systems
23 with decreased Nr fertilizer input may also provide an option on a large scale if the decrease in Nr
24 losses per unit of crop production in these diverse systems can be achieved without a decrease in
25 total food production, which would trigger indirect land use change to replace the lost production
26 and negate the benefits.

27 **Recommendation 2:**

- 28 2a. *Data on NFUE and N mass balance, based on direct measurements from*
29 *production-scale fields, are required for the major crops to identify which*
30 *cropping systems and regions are of greatest concern with regard to*
31 *mitigation of Nr load and to better focus research investments, policy*
32 *development, and prioritization of risk mitigation strategies.*
- 33 2b. *Promote efforts at USDA to: (i) investigate means to increase the rate of gain*
34 *in crop yields on existing farm land while increasing N fertilizer uptake*
35 *efficiency and (ii) explore the potential for more diverse cropping systems*
36 *with lower N fertilizer input requirements so long as large-scale adoption of*
37 *such systems would not cause indirect land use change.*
- 38 2c. *EPA should work closely with the U.S. Department of Agriculture (USDA),*
39 *Department of Energy (DOE), and the National Science Foundation (NSF) to*

1 *help identify research and education priorities for prevention and mitigation*
2 *of Nr applied to agricultural systems.*

3
4 **Finding 3**

5 Nitrous oxide emissions from the Nr inputs to cropland from fertilizer, manure, and
6 legume fixation represent a large proportion of agriculture’s contribution to greenhouse
7 gas emissions, and the importance of this source of anthropogenic greenhouse gas will
8 likely increase unless NFUE is markedly improved in crop production systems. Despite
9 its importance, there is considerable uncertainty in the estimates of nitrous oxide
10 emissions from fertilizer and research must focus on reducing this uncertainty.

11 **Recommendation 3:** *The committee recommends that EPA ensure that the uncertainty*
12 *in estimates of nitrous oxide emissions from crop agriculture be greatly reduced through*
13 *the conduct of EPA research and through coordination of research efforts more generally*
14 *with other agencies such as USDA, DOE, and NSF.*

15 **Finding 4**

16 Rapid expansion of biofuel production is changing the cost-benefit ratio of N fertilizer
17 use in crop production and also changing the nutrient profile of livestock diets with
18 consequences for effective management of Nr.

19 **Recommendation 4:** *EPA should join with USDA and DOE to understand and predict*
20 *the impact of biofuel production on maximizing the N efficiency of both crop and*
21 *livestock production systems and develop strategies for avoiding increased Nr load in the*
22 *environment as a result of current and future expansion of biofuel production from corn*
23 *and other “second generation” biofuel feedstock crops.*

24 **Finding 5**

25 There are no nationwide monitoring networks in the U.S. to quantify agricultural
26 emissions of greenhouse gases, NO, N₂O, reduced sulfur compounds, VOCs, and NH₃. In
27 contrast there is a large network in place to assess the changes in the chemical climate of
28 the U.S. associated with fossil fuel energy production, ie the National Atmospheric
29 Deposition Program/National Trends Network (NADP/NTN), which has been monitoring
30 the wet deposition of sulfate (SO₄²⁻), NO₃⁻, and NH₄⁺ since 1978.

31 **Recommendation 5:** *The status and trends of gases and particulate matter emitted from*
32 *agricultural emissions, e.g., NO₃⁻ and NH₄⁺ should be monitored nationwide by a network*
33 *of monitoring stations.*

1 **Finding 6**

2 Farm-level improvements in manure management can substantially reduce Nr load and
3 losses. There are currently no incentives or regulations to decrease these losses and loads
4 despite the existence of management options to mitigate.

5 **Recommendation 6:** *Policy, regulatory, and incentive framework is needed to improve*
6 *manure management to reduce Nr load and ammonia losses, taking into account*
7 *phosphorus load issues.*

8 **Finding 7**

9 Scientific uncertainty about the origins, transport, chemistry, sinks, and export of Nr
10 remains high, but evidence is strong that atmospheric deposition of Nr to the Earth's
11 surface as well as emissions from the surface to the atmosphere contribute substantially
12 to environmental and health problems. *The current NO₂ standard is inadequate to*
13 *protect health and welfare, and compliance monitoring for NO₂ is inadequate for*
14 *scientific understanding.* Atmospheric emissions and concentrations of Nr from
15 agricultural practices (primarily in the form of NH₃) have not been well monitored, but
16 NH₄⁺ ion concentration and wet deposition (as determined by NADP and NTN) appear to
17 be increasing. This suggests that NH₄⁺ emissions are increasing. Both wet and dry
18 deposition contribute substantially to NH_x removal, but only wet deposition is known
19 with much scientific certainty. Thus consideration should be given to adding these
20 chemically reduced and organic forms of Nr to the list of Criteria Pollutants.

21 **Recommendation 7a.** *Increase the scope and spatial coverage of the Nr concentration*
22 *and flux monitoring networks (such as the National Atmospheric Deposition Program*
23 *and the Clean Air Status and Trends Network) and appoint an oversight review panel for*
24 *these two networks.*

25 **Recommendation 7b.** *Monitor NH₃, NH_x, NO_y, NO₂, NO, and PAN concentrations,*
26 *measure or infer deposition, and support the development of new measurement and*
27 *monitoring methods.*

28 **Recommendation 7c.** *Measure deposition directly both at the CASTNET sites and*
29 *nearby locations with non-uniform surfaces such as forest edges.*

30 **Recommendation 7d.** *EPA should continue and support research into convective*
31 *venting of the Planetary Boundary Layer and long range transport.*

32 **Recommendation 7e.** *Develop and support analytical techniques and observations of*
33 *atmospheric organic N compounds in vapor, particulate, and aqueous phases.*

1 **Recommendation 7f.** *Increase the quality and spatial coverage of measurements of the*
2 *NH₃ flux to the atmosphere from major sources especially agricultural practices.*

3 **Recommendation 7g.** *Improve numerical models of NO_y and NH_x especially with*
4 *regard to chemical transformations, surface deposition, and off shore export; develop*
5 *linked ocean-land-atmosphere models of Nr.*

6 **Finding 8**

7 Although total N budgets within all terrestrial systems are highly uncertain, Nr losses
8 from grasslands and forests (vegetated) and urban (populated) portions of the N Cascade
9 appear to be higher, on a per cent of input basis, than from agricultural lands. The relative
10 amount of these losses ascribed to leaching, runoff and denitrification, are as uncertain as
11 the N budgets themselves.

12 **Recommendation 8:** *EPA should join with USDA, DOE, and universities should work*
13 *together in efforts to ensure that the N budgets of terrestrial systems are properly*
14 *quantified and that the magnitude of at least the major loss vectors are known.*

15 **Finding 9**

16 Over the past 25 years, there has been a growing recognition of eutrophication as a
17 serious problem in coastal estuaries (NRC, 2000). The last comprehensive national
18 NCCR was published in 2004 (EPA, 2004) included an overall rating of “fair” for
19 estuaries, including the Great Lakes, based on evaluation of over 2000 sites. The water
20 quality index, which incorporates nutrient effects primarily as chlorophyll-a and
21 dissolved oxygen impacts, was also rated “fair” nationally. Forty percent of the sites were
22 rated “good” for overall water quality, while 11% were “poor” and 49% “fair”.

23 **Recommendation 9:** *The committee recommends that EPA consider a range of scales*
24 *reflecting ecosystem, watershed, and regional levels that include all inputs, e.g.*
25 *atmospheric and riverine, of marine eutrophication dynamics and management.*

26 **Finding 10**

27 Denitrification of Nr in terrestrial and aquatic systems is one of the most uncertain parts
28 of the nitrogen cycle. Denitrification is generally considered to be a dominant N loss
29 pathway in both terrestrial and aquatic systems, but it is poorly quantified

30 **Recommendation 10:** *EPA, USDA, DOE, and universities should work together to*
31 *ensure that denitrification in soils and aquatic systems is properly quantified, by funding*
32 *appropriate research*

1 **Finding 11**

2 The committee finds that there is a need to measure, compute, and report the total amount
3 of Nr present in impacted systems in appropriate units. Since what is measured influences
4 what we are able to perceive and respond to; in the case of Nr, it is especially critical to
5 measure total amounts and different chemical forms, at regular intervals over time.

6 **Recommendation 11.** *The committee recommends that EPA routinely and consistently*
7 *account for the presence of Nr in the environment in forms appropriate to the medium in*
8 *which they occur (air, land, and water) and that accounting documents be produced and*
9 *published periodically (for example a fashion similar to National Atmospheric*
10 *Deposition Program (NADP) summary reports). The committee understands that such an*
11 *undertaking will require substantial resources, and encourages the Agency to develop*
12 *and strengthen partnerships with appropriate federal and state agencies, and private*
13 *sector organizations, with parallel interests in advancing the necessary underlying*
14 *science of Nr creation, transport and transformation, impacts, and management.*

15 **Finding 12**

16 The committee finds that reliance on only one approach for categorizing the measurement
17 of Nr is unlikely to result in the desired outcome of translating N-induced degradation
18 into the level of understanding needed to develop support for implementing effective Nr
19 management strategies.

20 **Recommendation 12.** *It is, therefore, recommended that the EPA examine the full range*
21 *of traditional and ecosystem response categories, including economic and ecosystem*
22 *services, as a basis for expressing Nr impacts in the environment, and for building better*
23 *understanding and support for integrated management efforts.*

24 **Finding 13**

25 Intervention to control Nr under most water management programs generally occurs in
26 three ways:

- 27
- 28 • Prevention or source controls
 - 29 • Physical, chemical or biological “dead ending” or storage within landscape
30 compartments where it is rendered less harmful (e.g., long-term storage in soils or
31 vegetation; denitrification, primarily in wetlands; reuse)
 - 32 • Treatment using engineered systems such as wastewater treatment plants or BMPs for
33 stormwater and nonpoint source runoff.

34 While most management programs focus on the third (treatment) approach, there are
opportunities for combining the three that can be more effective and cost less.

35 **Recommendation 13.** *To better address Nr runoff and discharges from the peopled*
36 *landscape the committee recommends that EPA:*

1 **13a.** *Evaluate the suite of regulatory and non regulatory tools used to manage Nr in*
2 *populated areas from nonpoint sources, stormwater and domestic sewage and*
3 *industrial wastewater treatment facilities, including goal-setting through water*
4 *quality standards and criteria. Determine the most effective regulatory and voluntary*
5 *mechanisms to apply to each source type with special attention to the need to regulate*
6 *nonpoint source and related land use practices.*

7 **13b.** *Review current regulatory practices for point sources, including both*
8 *wastewater treatment plants and stormwater, to determine adequacy and capacity*
9 *towards meeting national Nr management goals. Consider technology limitations,*
10 *multiple pollutant benefits, and funding mechanisms as well as potential impacts on*
11 *climate change from energy use and greenhouse gas emissions, including nitrous*
12 *oxide.*

13 **13c.** *Set Nr management goals on a regional/local basis, as appropriate, to ensure*
14 *most effective use of limited management dollars. Fully consider “green”*
15 *management practices such as low impact development and conservation measures*
16 *that preserve or re-establish Nr removing features to the landscape as part of an*
17 *integrated management strategy along with traditional engineered best management*
18 *practices.*

19 **14d.** *Research best management practices that are effective in controlling Nr,*
20 *especially for nonpoint and stormwater sources, including land and landscape*
21 *feature preservation and set Nr management targets that realistically reflect these*
22 *management and preservation capacities. Construct a decision framework to assess*
23 *and determine implementation actions consistent with management goals.*

24 **14e.** *Use ecosystem-based management approaches that balance natural and*
25 *anthropogenic needs and presence in the landscape.*

26 **Finding 14**

27 Meeting Nr management goals for estuaries, when a balance must be struck between
28 economic, societal and environmental needs, under current federal law seems unlikely.
29 Enforceable authorities over nonpoint source, stormwater, air (in terms of critical loads),
30 and land use are not adequate to support necessary Nr controls. Funding programs are
31 presently inadequate to meet existing pollution control needs. Furthermore, new
32 technologies and management approaches are required to meet ambitious Nr control
33 needs aimed at restoring national water quality.

34 **Recommendation 14.** *INC recommends that EPA reevaluate water quality management*
35 *approaches to ensure Nr management goals are attainable, enforceable, and affordable*
36 *and that monitoring and research are adequate to problem definition and resolution,*

1 *particularly in the development of nitrogen removal technologies. This may require*
2 *changes in the way EPA sets water quality criteria and some compromises in ecosystem*
3 *goals to accommodate human uses of the air, land and water.*

4 **Finding 15**

5 The committee has determined that an integrated approach to monitoring that
6 includes multimedia (air, land and water) components and considers a suite of
7 environmental and human concerns (e.g., Nr effects, climate change, human
8 health) would be most useful and efficient. Some of the phenomena that we
9 present in this report simply need more definition and verification but, more
10 importantly, as control is brought to bear on Nr, improvements need to be
11 measured (i.e. monitored) to validate the success of one control or another. If the
12 desired improvements are not realized as shown by the collected data, corrective
13 measures will be required. The pool of data would be used to formulate new
14 management procedures. The process of monitoring and control revisions is
15 termed adaptive management—a process that INC supports as it does not delay
16 actions that can be taken immediately, but acknowledges the likelihood that
17 management programs will be altered (adapted) as scientific and management
18 understanding improve.

19

20 **Recommendation 15.** *The committee recommends that EPA initiate discussions*
21 *and take action to develop a national, multimedia monitoring program that*
22 *monitors sources, transport and transition, effects using indicators where*
23 *possible, and sinks of Nr in keeping with the nitrogen cascade concept. This*
24 *comprehensive program should build upon existing EPA and state initiatives as*
25 *well as monitoring networks already underway in other federal agencies such as*
26 *the U.S. Geological Survey programs and the NADP effort.*

27

28 **Finding 16**

29 In this connection, the INC strongly commends EPA for its recently increased
30 willingness to think more holistically – and in more fully integrated ways – about both
31 the policy-relevant science and the practical arts of air quality management aimed at
32 protection of both aquatic and terrestrial ecosystems from adverse effects of Nr. These
33 shifts in both emphasis and approach have included:

- 34 a. Increased emphasis in the NAAQS review processes on scientific questions that
35 are as directly relevant as possible to well-defined policy questions of concern to
36 EPA;
- 37 b. More frequent discussion about both public-welfare and public-health impacts of
38 mixtures of air pollutants;
- 39 c. More frequent discussion about the critical loads concept as an alternative or
40 complement to the more familiar NAAQS Standards;

- 1 d. Separation of the preparation and review of documentation for a Secondary
- 2 (public-welfare-based) NAAQS from the (previously always dominating) Primary
- 3 (public-health-based) NAAQS review processes;
- 4 e. The decision by the Science Advisory Board of EPA to establish this special
- 5 Integrated Nitrogen Committee (INC); and
- 6 f. The unprecedented decision to undertake an integrated [simultaneous] review/ /of
- 7 the Secondary NAAQS for two Criteria Pollutants at the same time [Oxides of
- 8 Nitrogen (NO_x) and Oxides of Sulfur (SO_x)].

9
10 Especially notable evidence for EPA's "increased willingness to think more holistically –
11 and in more fully integrated ways" is the following statement of Conclusion in the
12 Executive Summary of the December 2008 Integrated Science Assessment for Oxides of
13 Nitrogen and Sulfur (EPA, 2008):

14 The main effects of N and S pollution assessed in the ISA are
15 acidification, N enrichment, and Hg methylation. Acidification of
16 ecosystems is driven primarily by deposition resulting from SO_x, NO_x, and
17 NH_x pollution. Acidification from the deposition resulting from current
18 emission levels causes a cascade of effects that harm susceptible aquatic
19 and terrestrial ecosystems, including slower growth and injury to forests
20 and localized extinction of fishes and other aquatic species. In addition to
21 acidification, atmospheric deposition of reactive N resulting from current
22 NO_x and NH_x emissions along with other non-atmospheric sources (e.g.,
23 fertilizers and wastewater), causes a suite of ecological changes within
24 sensitive ecosystems. These include increased primary productivity in
25 most N-limited ecosystems, biodiversity losses, changes in C cycling, and
26 eutrophication and harmful algal blooms in freshwater, estuarine, and
27 ocean ecosystems.

28 **Recommendation 16.** *INC recommends that the EPA give very careful consideration to*
29 *adoption of the critical loads concept in determining thresholds for effects of excess Nr*
30 *on terrestrial and aquatic ecosystems.*

31 **Finding 17**

32 Current EPA policy (EPA 2007e) discourages states from controlling ammonia emissions
33 as part of their plan for reducing PM_{2.5} concentrations. Ammonia is a substantial
34 component of PM_{2.5} in most polluted areas of the U.S. at most times. While it is true that
35 reducing NH₃ emissions might increase the acidity of aerosols and precipitation, the net
36 effect of NH₃ on aquatic and terrestrial ecosystems is to increase acidity. After being
37 deposited onto the Earth's surface, NH₄⁺ is under most circumstances, quickly nitrified,
38 increasing the acidity of soils and waters. The committee is unaware of any evidence
39 neither that NH₃ reduces the toxicity of atmospheric aerosols nor that high concentrations

1 of NH₃ occur naturally over any substantive area of the US. Lower NH₃ emissions will
2 lower PM_{2.5} concentrations. Such reductions in PM_{2.5} concentrations have been linked to
3 reductions in morbidity and mortality.

4 **Recommendation 17.** *The committee recommends that the EPA presumption that NH₃ is*
5 *not a PM_{2.5} precursor should be reversed and states should be encouraged to address*
6 *NH₃ as a harmful PM_{2.5} precursor.*

7 **Finding 18**

8 The committee notes that the effective management of Nr in the environment must
9 recognize the existence of tradeoffs across impact categories involving the cycling of
10 other elements, particularly C.

11 **Recommendation 18.** *The committee recommends that the integrated strategies for Nr*
12 *management outlined in this report be developed in cognizance of these interrelations*
13 *and tradeoffs*

14 **Finding 19**

15 The committee finds that there have been persistent increases in the amounts of Nr that
16 have been emitted into and retained within various ecosystems, affecting their
17 functioning. Unless this trend is reversed, it will become increasingly difficult for many
18 of these ecosystems to provide the services upon which human well-being is dependent.
19 The committee believes that there is a need to regulate certain forms of Nr to address
20 specific problems related to excess Nr, and we believe that the best approach for an
21 overall management strategy is the concept of defining acceptable total Nr critical loads
22 for a given environmental system

23 **Recommendation 19.** *The committee recommends that the Agency work toward*
24 *adopting the critical loads approach in the future. In carrying out this recommendation*
25 *the committee recognizes that it will in many cases be necessary for the Agency to enter*
26 *into new types of research, policy, and regulatory agreements with other Federal, State,*
27 *and Tribal units based on cooperative, adaptive, and systemic approaches that derive*
28 *from a common understanding of the nitrogen cascade.*

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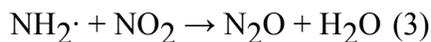
Appendix 4: Technical Annexes

A. Production of N₂ and N₂O via gas-phase reactions

Atmospheric conversion of NO_x and NH_x to less reactive N₂ or N₂O appears to play a minor role in the global N budget, but currently is not well quantified. The gas-phase reactions in the troposphere that convert NH₃ and NO_x to N₂ and N₂O, start with attack of NH₃ by OH:



Several potentially interesting fates await the NH₂ radical:



$$k_{\text{O}_3} = 1.9 \times 10^{-13} \text{ cm}^3 \text{ s}^{-1}$$

$$k_{\text{NO}_2} = 1.8 \times 10^{-11} \text{ cm}^3 \text{ s}^{-1}$$

$$k_{\text{NO}} = 1.8 \times 10^{-11} \text{ cm}^3 \text{ s}^{-1}$$

The first step, attack by OH, is slow. The rate constant for the Reaction 1 is $1.6 \times 10^{-13} \text{ cm}^3 \text{ s}^{-1}$ and the lifetime of NH₃ for a typical concentration of 10^6 OH cm^{-3} is about 70 d. In most areas of the world where concentrations of NH₃ are high, concentrations of sulfates are also high, and NH₃ is removed by conversion to condensed phase ammonium sulfate or bisulfate on time scales much faster than 70 d. The mean lifetime of these aerosols with respect to wet deposition is about 10 d.

There are some areas of the world, notably California and South Asia, where NH₃ and NO_x are emitted in large quantities, but SO₂ is not, and there gas-phase conversion can

1 take place. In general, $[O_3] \gg [NO_x]$, and Reaction 2 represents an unimportant source
2 of NO_x , but Reactions 3 and 4 may be atmospherically noteworthy. As an upper limit to
3 current N_2O production, we can assume that each of these regions covers an area of 10^6
4 km^2 and that they contain ammonia at a concentration of $10 \mu g N m^{-3}$ in a layer 1000 m
5 deep. The annual production of N_2 and/or N_2O would then be on the order of 0.1 Tg N, a
6 minor but nontrivial contribution to denitrification and about 1% of the anthropogenic
7 N_2O production. If NH_3 -rich air is lofted out of the boundary layer into the upper
8 troposphere where deposition is impeded, it will have an atmospheric residence time on
9 the order of months, and the probability of reaction to form N_2O or N_2 becomes greater.
10 This possibility has not been investigated extensively. It is also possible than Europe
11 and North America will continue to reduce S emissions without reducing NH_3 emissions
12 and the atmospheric source of N_2O will grow in importance.

13

14 In the stratosphere, N_2O photolysis leads to loss of Nr via

15



17

18 While reaction with an electronically excited oxygen atom $O(^1D)$ leads to production of
19 NO via

20



22

23 Photolysis (Reaction 5) dominates, but a large enough fraction of the N_2O reacts with
24 $O(^1D)$ that this is the main source of NO_x in the stratosphere. The fate of this oxidized
25 nitrogen (NO_y) is transport back into the troposphere where it is removed by wet
26 deposition. Downward transport of the odd N from the oxidation of N_2O is a minor
27 (~1%) source of NO_y in the troposphere. Most of the N_2O released into the atmosphere is
28 eventually converted to N_2 – the problem is that it destroys stratospheric ozone in the
29 process.

30

31 In summary, our current understanding of the chemistry of atmospheric ammonia
32 suggests that *in situ* conversion to N_2 and N_2O plays a minor (~1%) role in global N

1 budgets, but if assumptions about kinetics or concentrations are in error these
2 mechanisms could become important.

3 **B. SPARROW Model for Estimating Watershed Nr**

4 Estimates of Nr transfers in aquatic ecosystems are difficult to quantify at the national
5 scale, given the need to extrapolate information from sparse monitoring data in specific
6 watersheds to the geographic boundaries of the nation. One excellent tool for estimating
7 Nr loads at regional scales is the spatially referenced regression on watershed attributes
8 (SPARROW) modeling technique. The SPARROW model has been employed to
9 quantify nutrient delivery from point and diffuse sources to streams, lakes, and watershed
10 outlets at the national scale (Smith et al. 1997). The model infrastructure operates in a
11 geographic framework, making use of spatial data to describe sources of pollutants (e.g.,
12 atmospheric deposition, croplands, fertilizers) and characteristics of the landscape that
13 affect pollutant transport (e.g., climate, topography, vegetation, soils, geology, and water
14 routing). Though empirical in nature, the SPARROW modeling approach uses
15 mechanistic formulations (e.g., surface-water flow paths, first-order loss functions),
16 imposes mass balance constraints, and provides a formal parameter estimation structure
17 to statistically estimate sources and fate of nutrients in terrestrial and aquatic ecosystems.
18 The spatial referencing of stream monitoring stations, nutrient sources, and the climatic
19 and hydrogeologic properties of watersheds to stream networks explicitly separates
20 landscape and surface-water features in the model. This allows nutrient supply and
21 attenuation to be tracked during water transport through streams and reservoirs, and
22 accounts for nonlinear interactions between nutrient sources and watershed properties
23 during transport. The model structure and supporting equations are described in detail
24 elsewhere (Smith et al. 1997, Alexander et al. 2000, Alexander et al. 2008). Table 1
25 provides an estimate of contemporary Nr loading in surface waters of the US,
26 representing long-term average hydrological conditions (over the past 3 decades). There
27 are hot spots of high Nr yields to rivers (Figure 19) associated with land use and
28 watershed characteristics, and SPARROW allows considerations of the fate of these Nr
29 inputs to streams and rivers as they flow downstream to coastal receiving waters
30 (Alexander et al. 2008).

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