

Mississippi River Water Quality Collaborative - Hypoxia SAB Teleconference Oral Comments by Susan Heathcote 8-1-07

My name is Susan Heathcote and I am the Water Program Director for the Iowa Environmental Council, a statewide coalition of 75 organizations in Iowa. The Iowa Environmental Council is one of 23 groups that comprise the Mississippi River Water Quality Collaborative. The Collaborative works together to improve water quality in the Mississippi river by sharing expertise in clean water and farm policy.

The Collaborative sent written comments to the Science Advisory Board in a letter dated June 29th, commenting on the May 24 draft report. In addition to the Iowa Environmental Council, my comments today are on behalf of the following 14 members of the Mississippi River Water Quality Collaborative:

- Environmental Law and Policy Center (Illinois)
- Environmental Working Group (DC)
- Institute for Agriculture and Trade Policy (Minnesota)
- Gulf Restoration Network (Louisiana & Mississippi)
- Kentucky Waterways Alliance
- Louisiana Environmental Action Network
- Midwest Environmental Advocates (Wisconsin)
- Minnesota Center for Environmental Advocacy
- Minnesota Project
- Missouri Coalition for the Environment
- Natural Resources Defense Council (DC)
- Prairie Rivers Network (Illinois)
- Tennessee Public Employees for Environmental Responsibility, And
- Tennessee Clean Water Network

The comments that I offer today are based mainly on our review the May 24th draft and do not reflect the changes in the current draft that the SAB is working off of today. I do want to add one update to our June 29th submitted letter. According to a report from Dr. Nancy Rabalais, the “Dead Zone” this year ranks as one of the three largest Dead Zones to date, with an area of 20,500 square kilometers. This is not good news and indicates that we have a very long way to go to reach the Hypoxia Action Plan goal of a 5-year running average of less than 5000 square kilometers.

In general, we find much to commend in the May 24 draft. It identified areas where additional data should be gathered to further inform the understanding of certain aspects of hypoxia, but does not let these data gaps become a recipe for delay until the unresolved issues are addressed. Specifically, we applaud the panel’s attention to solutions in the May 24 draft. This includes recommendations:

- to restructure agricultural support payments to reward conservation practices and switch to perennial crops;
- to require sewage treatment plants in the basin to contribute to needed nutrient load reductions by limiting their permitted discharges; and
- to restore wetlands for control of nonpoint source nutrient loads.

We hope that the board will include these important recommendations in your final report.

The Collaborative urges the panel to strengthen the report by recommending that states establish water quality standards for nitrogen and phosphorus as soon as possible to protect their state waters -- and downstream waters -- and that EPA establish nutrient standards if the States do not.

I found your discussion today about N and P permit limits for wastewater treatment facilities interesting and I encourage you to include in your final recommendations at least technology based discharge limits for N & P for new sewage treatment plants in the basin. We further request that the Science Advisory Board consider what benefit establishment of state nutrient criteria would provide toward achieving the goals of the Hypoxia Action Plan?

Again, thank you for the opportunity to provide these comments and we look forward to reviewing your final report.