

June 29, 2007

Hypoxia Advisory Panel
c/o Dr. Holly Stallworth
USEPA Headquarters
Ariel Rios Building
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Re: EPA's Scientific Advisory Board's Hypoxia Advisory Panel Public Draft Report

Dear Environmental Protection Agency Science Advisory Board Hypoxia Panel,

I am writing in support of the EPA's Scientific Advisory Board's Hypoxia Advisory Panel Public Draft Report published May 24, 2007. The Kentucky Waterways Alliance, Inc. (KWA) is a statewide nonprofit organization dedicated to protecting and restoring our waterways. The Kentucky Waterways Alliance represents over 500 members and affiliate organizations united to ensure high quality water resources in Kentucky for diverse recreational activities such as swimming, boating, and fishing as well as reliable drinking water supplies.

Nutrient pollution is a significant source of water body impairment in Kentucky's lakes and streams; and Kentucky provides a significant contribution to the total nutrient loading in the Ohio and Mississippi River Basins and ultimately the Gulf of Mexico. KWA is advocating for the Kentucky Division of Water (KDOW) to immediately promulgate nutrient water quality standards. KDOW may be prepared to propose a total P standard of 1.0 mg/L as a part of the 2007 Triennial Review. We believe the SAB's Hypoxia Advisory Panel Public Draft Report echoes our concern for the urgent need for nutrient reductions in Kentucky. The Panel's policy recommendations equip KDOW with the framework to achieve meaningful nutrient reduction goals through promulgation of total N and total P standards, as well as agricultural and nonpoint source reduction measures.

As a member of the Mississippi River Water Quality Collaborative (MSWQC), KWA reasserts the Collaborative's comments and concerns. We commend the SAB for recommending:

1. Setting a 45 % nitrogen (N) reduction goal and a 40% phosphorus (P) reduction goal to achieve the original Coastal Goal of a Dead Zone measuring less than 5,000 km².

2. Re-structuring current agricultural support payments to reward conservation practices.
3. Re-structuring current agricultural support payments to provide an economic incentive to switch from corn-soybeans to perennial crops.
4. Requiring Mississippi Area River Basin (MARB) sewage treatment plant (STP) upgrades to achieve total N concentrations of 3 mg/L and total P concentrations of 0.3 mg/L.
5. Requiring nutrient concentrations or loading limits in major STP permit renewals.
6. Wetland restoration specifically to control nonpoint source nutrient loads, particularly in areas of heavy tile drainage.

We support the release of a final Hypoxia Advisory Panel report establishing scientifically sound policy implementation solutions that promote meaningful diminution of nutrient pollution and the Gulf of Mexico Dead Zone.

Thank you for considering our comments.

Respectfully Submitted,

Jason Flickner
Water Resources Program Director