

Comments from Mississippi River/Gulf of Mexico Watershed Nutrient Task Force

Submitted on behalf of the Task Force
by Benjamin Grumbles, Chair
June 13, 2007

Overall

- Congratulations on a timely, thoughtful and comprehensive effort
- The Panel has been responsive to the charge from the Task Force
- We also sense the Panel is expanding on the charge to address some policy issues
- Strongly support the SAB's public process
 - Clarify the timing and usefulness of comments for final report.

Overall (cont.)

- Can the HAP prioritize the science and modeling recommendations?
 - Are there any critical issues or recommendations that should be addressed first?
 - Which specific research would yield the greatest gain to reduction actions?
- Encourage the HAP to clarify or describe certain terms:
 - Inshore (within barrier islands or near coast) vs. offshore (deep water or off estuaries)
 - Tributary (basin) vs. distributary (delta)
 - Diversions for coastal releases from the river vs. retention of water in the basin for nutrient removal
 - N, TN, Nitrate

Size/Cause

- Can HAP expand on indications of ecosystem regime shift?
 - Differentiate physical versus biological (e.g., phytoplankton, benthic organisms)
 - Report known changes in fisheries
- Are the data from sediment cores adequate to support theory that size of the zone has increased?
 - Some confusion in strength of conclusion about paleo record
- Can HAP elaborate on the impacts to within-basin benefits of reduced loadings?
 - Loadings to Gulf versus in-basin loadings

Source/Fate/Transport

- Correct the different numbers cited for the potential reductions from point sources
 - E.g., 84% of total is NPS conflicts with 36% potential for point sources reductions
- Expand on predicted bio-fuel impacts to water quality
 - Local impacts vs. Gulf impacts
 - Current impacts vs. future impacts

Management

- Can the discussion of the social benefits of reducing hypoxia be expanded?
- Address apparent conflict in language on value of voluntary programs
 - Task Force members are aware of many examples of effective voluntary programs
 - Market-based approaches, such as water quality trading, show increasing promise
- What was the basis for the 0.3 mg/L limit for P from POTWs and what was the basis for the N recommendations?

Management (cont.)

- Clarify baseline for reduction
 - Is it 1980's-1990's or current conditions?
- Can the HAP elaborate on the recommendation to leave the goal as is?
 - Was there discussion regarding changing the goal in terms of:
 - volume vs. area
 - Loadings vs. percent reductions
- Can HAP increase the specificity of the conservation practices needed to meet the reduction targets?
- Any recommendations for how to estimate cost to get it done?
 - Are there any cost estimates?