Comments for Gulf Hypoxia Task Force Public Comments Dec 14, 2021

December 14, 2021
Gulf Hypoxia Task Force

Dear Task Force Committee Members:

Good afternoon, my name is Christine Favilla and I am representing the Illinois Chapter of the Sierra Club as the Three Rivers Project Coordinator, based out of Alton, IL - across the river from St. Louis, MO. Thank you for the opportunity to submit comments during your Annual Meeting. Specific suggestions that I will go into detail about include: the lack of public and non-profits on the Gulf Hypoxia Task Force; despite progress, nutrient pollution continues to increase in the Mississippi River basin; the fact that our water bodies are degraded and poisoned with Blue Green Algae because of nutrients that don't necessarily make it to the Gulf; and some ideas about funding this work.

As we know, the Gulf Hypoxia Task Force consists of representatives from 12 states, 5 federal agencies, and 1 representative for tribes. However, the Gulf Hypoxia Task Force does not have any formally appointed members from non-profit organizations or grassroots/community groups. The Task Force hosts only one public meeting each year where there is an opportunity for members of the general public to engage. In the past, this public meeting has not been heavily attended by members of the public. Since the Task Force is the only group formally tasked with and responsible for specific goals related to reducing nutrient pollution in the Mississippi River basin, we need to make sure that we are including the public, who all live downstream of a polluter, and non-profit organizations that are looking at all the various ways to decrease nutrient loads and head off the dead zone.

As we are aware, the Task Force and the states involved have two specific goals:

1. An interim Target of reducing nitrogen and phosphorus loading to the Gulf by 20 percent by the year 2025, and an ultimate target of reducing 45 percent by 2035
2. Reducing the average annual size of the Hypoxic Zone of 5,000 square kilometers by the year 2035

However, each of the 12 states involved has its own "State Nutrient Reduction Strategy" related to these overarching goals, thus each strategy is different: some are quantitative and some are entirely qualitative. This makes it inherently difficult to compare different states' strategies to each other or precisely assess how any given state is contributing to the overall goals of the Gulf Hypoxia Task Force. We implore this Committee to enlist public support to achieve the milestones mentioned above for reducing the Gulf hypoxic zone and improving water quality in the Mississippi River Basin. Widening the Task Force's base can help ensure different types of

research, outreach, and educational efforts will be enacted, leading to the implementation of best management practices on the land and in facilities.

Despite progress, nutrient pollution continues to increase in the Mississippi River basin. After Illinois farmers have used several conservation practices for non-point sources (which garner our thanks and congratulations) and NPDES-permitted wastewater facilities started working on their Nutrient Assessment and Reduction Plans, there were still increases in both phosphorus and nitrogen in Illinois. It appears that no one wants to address the big issues why levels are going up: heavy rainfall and Confined Animal Feeding Operations (CAFOs). CAFOs are discharging way too much phosphorus through waste applications on fields and the amount of pollution caused by them is not being compiled from these factory farms. Much of the information about CAFOs is not available to the public or researchers, so it is impossible to quantify their contribution to river loads; we do not know how much phosphorus is being applied to lands, but in Illinois, it's obvious that application rates for manure are way too high. This has to be addressed, even if it is politically touchy. We need to require continuous monitoring of all pollutants so that gross polluters can be stopped in real time.

While this Task Force focuses on reducing the Dead Zone in the Gulf, we want to remind you that nutrient pollution doesn't just affect the Gulf and the Dead Zone; it contributes to public health and economic concerns for all of us. This shows up in Illinois as cyanobacterial blooms, also known as blue green algae. CyanoHABs produce multiple toxins, including liver, nerve, and skin toxins, which can affect human and animal health. CyanoHABs occur naturally, but human activities like nutrient pollution, introduced species, and water flow modifications play a role in their more frequent occurrence and intensity. In Illinois, we are currently under an advisory on parts of the Illinois River, leading to less outdoor experiences for residents and their dogs.

We need more resources to tackle the hypoxia problem. Here are a few suggestions:

1. There is $60 million dedicated to this issue in the Infrastructure Bill that passed recently;
2. Illinois has received $8.1 billion in American Rescue Plan Act Coronavirus State and Local Fiscal Recovery Funds. One of the ways these funds can be used is for water infrastructure. Will Illinois spend some of these funds to help meet the Strategy's 2025 targets? It would be great to get the state to provide cost-share to implement trackable practices: cover crops, buffers, wetlands, bioreactors;
3. We can support the Mississippi River Restoration & Resilience Initiative (MRRRI), which would create a new federal funding program.

Thank you for taking my comments into consideration. I hope: that there is a way for you to include public and non-profits on the Gulf Hypoxia Task Force; that CAFOs will be addressed sooner than later; that it is clear that other problems exist due to nutrient pollution; and that you can explore some of the funding ideas that I have brought up.

Sincerely,

Christine Favilla
Three Rivers Project Coordinator
Sierra Club
618-401-7870
112 Front Street
Alton, IL 62002

christine.favilla@sierraclub.org
http://www.sierraclub.org/illinois/piasa-palisades