



Green Lands Blue Waters

December 8, 2022

Mississippi River and Gulf of Mexico Hypoxia Task Force
Radhika Fox (Co-Chair), U.S. Environmental Protection Agency
Mike Naig (Co-Chair), Iowa Department of Agriculture and Land Stewardship

Submitted via email to Katie Flahive at Flahive.Katie@epa.gov

**Re: Green Lands Blue Waters Comments for the 37th Public Meeting of the
Gulf Hypoxia Task Force on December 14, 2022**

Gulf Hypoxia Task Force Members:

Green Lands Blue Waters (GLBW) thanks the Hypoxia Task Force for this opportunity to engage through this public comment. We also thank the Task Force for its persistent perseverance over the last 25 years on the wicked problem of hypoxia - a problem with complex causes that resists quick, cookie-cutter solutions. For 18 years, GLBW has encouraged solutions that provide benefits for the Gulf of Mexico by improving soil health, reducing the loss of nutrients, addressing the loss of biodiversity, and mitigating climate change, thereby increasing the resilience and sustainability of the basin's agricultural, ecological, and human systems.

Green Lands Blue Waters is a regional consortium in the Upper Mississippi River Basin that supports the development of and transition to multi-functional agricultural systems that integrate perennials and other forms of continuous living cover. The consortium was created by university researchers and educators along with nonprofit advocates from multiple states in response to the Hypoxia Task Force's call for reducing nutrient loads from the watershed entering the Mississippi River and Gulf of Mexico. Participants in the GLBW network include farmers, farm advisors, conservation agencies, community-based nonprofits, commodity groups, policy experts, and scientists from more than 40 different institutions and organizations. By supporting this network of agricultural stakeholders, GLBW facilitates the expansion of continuous living cover (CLC) acreage.

Our values include merging science, equity, and advocacy around solutions that are beneficial to water quality, and our work catalyzes programs and practices that are strongly anchored in these values. Water quality issues at the end of the Mississippi River are a consequence of how the land is used, qualitatively and quantitatively, and has been developed for 200 years; and the effects of climate change are exacerbating the challenges. Soil health is key and many farming practices can evolve to become more sustainable using existing approaches and prioritizing a CLC framework.

CLC is not limited to or dependent on farm size or agricultural philosophy. Increasing living cover is adaptable to farming systems that range from broadly transformative - like growing the perennial Intermediate Wheatgrass, Kernza®, establishing agroforestry production systems, or maintaining perennial forage for rotational grazing of livestock - to practices like adding cover crops and other conservation methods to row-crop production of food and fuel crops that work within existing cropping systems.

Two current opportunities that offer ways to engage GLBW network assets and expertise to lift CLC systems to a new level of implementation include the Mississippi River Restoration and Resilience Initiative (MRRRI) and the Bipartisan Infrastructure Law (BIL). GLBW supports the proposed MRRRI to increase coordination and improve impacts of programs addressing water quality and other resource concerns. A holistic strategy for the Mississippi River would reduce redundancies and increase the efficiency of work that is already happening, while also streamlining the efforts of state and federal agencies, many of which are challenged by capacity constraints. In addition, current levels of BIL funding for Hypoxia Task Force states, while not yet sufficient, could be leveraged if state leads engage with and involve GLBW and its network partners in work plan activities.

Multiple pathways up the mountain are necessary for innovation, for adaptation to be applied and learned from. The marriage of multiple approaches and necessary adaptations must be a social endeavor. Natural systems evolved over millennia, and we need to emulate the natural processes that build soil health. But time is of the essence, and it is time to deliberately engage both equitable social systems and what we know about natural resource systems together to make necessary landscape scale changes. Examples of collaboration, engagement, and outreach can be found at greenlandsbluewaters.org

Some of our current activities include: coordinating a research topic, “Continuous Living Cover: Adaptive Strategies for Putting Regenerative Agriculture into Practice,” in the journal *Frontiers in Sustainable Food Systems*; leading and collaborating on extension, education, policy, and integration objectives on three USDA-funded Sustainable Agricultural Systems projects in Minnesota and Wisconsin; facilitating a mentorship program with the Mississippi River Network for graduate students and early career conservation professionals of color; launching a training development project with University of Wisconsin’s Conservation Professional Training Program to build a foundation of CLC knowledge for natural resource professionals.

We are doing good work with our partners, but we must do better and do more. We need better data systems that assess the relationship between our actions and the goals that have been established by the Task Force, so that we are all accountable to progress. We need networks of intermediaries and community-based incubators of change that recognize the nuances of people, place, land, water, and local to regional natural systems. We must think generationally while required changes become more and more urgent.

We appreciate this opportunity to comment and strongly encourage more ongoing, consistent avenues for public engagement with individuals and organizations dedicated to improving water quality and livelihoods in the Mississippi River Basin. Coordination with these organizations could be actualized with resources through MRRRI and BIL funding. Green Lands Blue Waters remains a long-time and long-term partner in identifying needs and creating change with multiple partners on the working lands of the Upper Mississippi River Basin.

Sincerely,



Erin M. Meier, Director
On behalf of the Green Lands Blue Waters Steering Committee

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