



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](mailto:Flahive.Katie@epa.gov)*

**Re: Mississippi River Network (MRN) Comments for the 37<sup>th</sup> Public Meeting of the Gulf Hypoxia Task Force on December 14, 2022**

Dear Gulf Hypoxia Task Force Members:

We appreciate the opportunity to provide a public comment for consideration of the Gulf Hypoxia Task Force at its 37<sup>th</sup> public meeting in Washington, DC. The Mississippi River Network (MRN) will also deliver some of these comments verbally at the in-person meeting.

**MRN & Our Public Engagement with HTF**

MRN is a coalition of over 60 member and partner organizations working together to protect our River. The Network seeks to influence not only policies that impact the River, but also people's perceptions of and connections to the River. MRN's policy program works in tandem with our public education and advocacy program called *1 Mississippi* to urge decision makers to create federal and state policies that improve the health of the River. MRN educates both its 60+ member organizations and the public on how River-friendly policies may promote a healthier Mississippi River, and MRN amplifies opportunities to reach decision makers and advocate for such policies.

We have encouraged both our Network members and our grassroots River Citizen community to reach out to you to share their visions for a healthy Mississippi River. For the last several years, we have also encouraged this grassroots base of supporters to make public comments at your virtual meetings and take advocacy actions directed at HTF members. We know that these public meetings are important occasions for HTF member agencies and states to advance

implementation of the Action Plan *and* to inform the public about the specific steps that are being taken to achieve the Plan's goals.

While these annual HTF meetings are open to the public, we are disappointed that more isn't done by the Task Force to encourage robust public attendance or engagement. Each year, the length of the publicly accessible portions of the meeting decreases and the ways in which the public can engage are also impacted. For example, we were disappointed to see that there was no way for the public to comment virtually at this meeting (even though virtual attendance is offered).

We would like to see this public body increase its public engagement over time, not diminish it. More public engagement helps us all advocate for more and better resources for the HTF and our state agencies to do this work. This EPA under the Biden Administration has also renewed its commitment to environmental justice and racial equity. Given all of this, three specific suggestions we have for the HTF:

- Add a "Public Engagement Opportunities" section to the quarterly HTF newsletter so upcoming public events, open public comment periods, or relevant state rulemaking efforts are clearly shared with the public between HTF meetings;
- Schedule listening sessions in Mississippi River communities that are accessible to those communities that live along the Mississippi River and take steps to ensure that participation reflects the community's actual demographics; and
- Establish partnerships with community organizations who represent under-resourced groups along the Mississippi River to assist in HTF's outreach to those communities.

We know that EPA has numerous resources on equitable public engagement and outreach practices; if some of these types of efforts above are already underway, we would be eager to learn more about them and help connect our River Citizen communities to them.

**EPA's "Mississippi River Restoration and Resiliency Strategy" says more coordination is needed; a holistic program for the River could accomplish this**

MRN was eager to read the EPA Report to Congress on the "Mississippi River Basin Restoration and Resilience Strategy," released in August. A recurring theme in this strategy document was the need for increased cross-agency collaboration and coordination. We strongly agree with the need for a holistic, basin-wide strategy for the Mississippi River that brings all the relevant agencies expertise to bear.

The Great Lakes, Puget Sound, Everglades, and other treasured geographies already enjoy the benefits of a dedicated federal program – it is time for the Mississippi River to follow suit. MRN has always supported a unified vision for the River, including through recent efforts such as the Mississippi River Restoration and Resilience Initiative (MRRRI).

A non-regulatory restoration program for the River such as MRRRI would mean increased coordination in the Basin as well as more efficient and effective use of existing funding. As the MRRRS document lays out in Appendix B, there are already numerous federal programs and investments working within the Basin. A holistic strategy for the Mississippi River would reduce redundancies and increase the efficiency of the work that is already happening, all while streamlining the efforts of state and federal agencies (many of which are under extreme bandwidth and capacity constraints).

A dedicated program for the River could also provide funds for restoration projects in river states, cities, townships, and tribal nations all while prioritizing the most at-risk and under-resourced river communities. MRRRI, for example, includes specific set-aside funding for communities of color and counties in persistent poverty.

MRN's own work on poverty and flooding<sup>1</sup> in the Mississippi River corridor shows that investing in these communities not only contributes to strong environmental outcomes, but also invigorates local economies. Such a set-aside is also in line with efforts such as the Justice40 Initiative and its goal for 40 percent of the overall benefits of certain Federal investments to flow to disadvantaged communities that are marginalized, underserved, and overburdened by pollution.

### **Bipartisan Infrastructure Law (BIL) Funding for HTF is a good start, but more dedicated investment is needed**

The Bipartisan Infrastructure Law (BIL) includes \$12 million per year for five years (\$60 million total) for actions to support the Task Force's Action Plan – the so-called BIL Gulf Hypoxia Program (GHP). As laid out in EPA's June 2022 Guidance document, this amounts to less than \$1 million per year per state and closer to \$750,000 per year per state in FY23 through FY25. While this funding is a step in the right direction, it is nowhere near the scale of dedicated investment we know we need to achieve HTF goals.<sup>2</sup>

MRN has a history of advocating for increased federal funding for state nutrient reduction strategies and related programs, and we will continue to do so. Initiatives like MRRRI mentioned above are one way we are actively advocating for increased funding to support nutrient pollution reduction work. MRRRI could fund nature-based solutions such as wetland and floodplain restoration projects, efforts to decrease urban runoff pollution, and projects to increase the use of continuous living cover agricultural systems to name just a few potential funding streams.

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<sup>1</sup> See MRN's Flooding and Poverty Map here <https://mississippiriver.org/our-work/#fl>

<sup>2</sup> HTF has an Interim Target of reducing nitrogen and phosphorus loading to the Gulf by 20 percent by the year 2025, as a key step in reaching an average annual size of the Hypoxic Zone of 5,000 square kilometers by the year 2035.

We are encouraged that the BIL GHP guidance includes cross-cutting priorities related to environmental justice (“Ensure that GHP benefits are realized by disadvantaged communities”) and climate change (“Advance water quality actions that have climate adaptation or mitigation co-benefits”). We appreciate that EPA strongly encourages funding to target “equity and climate resilience where possible and appropriate.”

We hope that HTF states will consider MRN member organizations a resource as they develop their GHP work plans, especially with respect to ensuring that “environmental justice” funds are used in a way that meaningfully serves those communities and has community buy-in.

Thank you for the opportunity to provide these comments. If you have any questions or would like additional information about any of the above, please reach out to Maisah Khan, Policy Director at the Mississippi River Network at [mkhan@1mississippi.org](mailto:mkhan@1mississippi.org).

Sincerely,

A handwritten signature in black ink that reads "Maisah Khan". The signature is written in a cursive, flowing style.

Maisah Khan  
Policy Director  
Mississippi River Network