January 27, 2026

Mississippi River and Gulf Hypoxia Task Force
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Submitted via email to Katie Flahive at Flahive.Katie@epa.gov

Subject: One Mississippi Comments for the 39th Public Meeting of the Gulf Hypoxia Task Force on February 5

Dear Gulf Hypoxia Task Force Members:

Thank you for the opportunity to provide public comments ahead of the 39th Gulf Hypoxia Task Force meeting, which will be held both in person and virtually. One Mississippi will attend the meeting virtually, and, as appropriate, we are willing and able to respond to those day-of presentations if called upon.

The Gulf Hypoxia Task Force (GHTF) is a high priority for One Mississippi's mission and work:

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One Mississippi is a growing movement of over 20,000 people and over 75 organizations committed to protecting the future of the Mississippi River. We seek to influence not only policies that affect the River, but also people's perceptions of and connections to the River. A significant part of that work includes advocating, educating, and working to reduce the impacts of agricultural and urban runoff and support sustainable agriculture for better water quality.

We have encouraged our supporters, the River Citizens, and member organizations to share their visions for a healthy Mississippi River. We've engaged both grassroots and grasstops networks to promote public comments at your meetings and advocacy actions directed to GHTF members. We know of over a dozen member organizations, both national and from mainstem states, that plan to attend this meeting. The Hypoxia Task Force is the only federal-state initiative focused on reducing nutrient pollution in the Mississippi River basin. We view the Task Force's successes as our own and its failures as opportunities to collaborate more effectively on these critical issues. Collectively, our network of organizations represents millions of Americans, and we appreciate the opportunity to provide input.

We urge more robust public engagement, especially from organizations working in the 12 mainstem states and directly working with frontline communities.

In 2022, we asked the Task Force to meet in the Mississippi River basin, and we were appreciative that in 2023, this meeting took place in Fayetteville, AR. We were disappointed that no meeting was held in 2024 and that this meeting, although the virtual component is appreciated, is again based in DC. One Mississippi is eager and willing to help inform places and partners that could help inform decision-making around locations. The Task Force's public outreach and engagement efforts will be more accessible and impactful if co-located in areas with higher numbers of individuals interested in Mississippi River policy and organizations active in this space.

In 2022, we heard that state agencies pursue public engagement and stakeholder outreach at the local and state levels for specific projects and campaigns throughout the year, outside the GHTF meeting. **Please report on these activities over the past two years and share why those state NGOs and other stakeholders are not actively engaged in or presenting at these annual Hypoxia Task Force public meetings.**

Results– while trends are averaging down, we still have significant work to do to meet goals.

In 2025, the Dead Zone measured 4,402 square miles—nearly the size of Connecticut. While this is smaller than last year, it is still more than double the long-standing goal of reducing the Dead Zone to fewer than 1,900 square miles, as set by the GHTF. As you know, scientists and state leaders back that goal, and it was initially meant to be achieved in 2015. A decade later, we're still falling short. "The five-year average size of the dead zone is now 4,755 square miles, more than two times larger than the 2035 target."[1] We must fundamentally change how we address the pollution that drives the dead zone to meet this goal. We are concerned about staffing, funding, and resourcing cuts to programs and scientists that are desperately needed to scale up, not down, efforts. Unfortunately, instead of increasing investments to address the problem, the federal government is regularly considering cuts to the very agencies and programs responsible for monitoring and reducing this pollution. We are aware and concerned because not only is the Environmental Protection Agency (EPA) crucial to the goals of the GHTF, but also the U.S. Geological Survey (USGS), National Oceanic and Atmospheric Administration (NOAA), and the Department of Agriculture (USDA) are essential to tracking water quality and supporting conservation efforts collectively as well. **Please provide a status report on how these changes are impacting the GHTF work.**

There is a significant need for a cross-agency, cross-state, community, and whole river approach.

The state nutrient reduction strategies are designed to improve the health, function, and resilience of the Mississippi River basin, and efforts to reduce them have had some success. However, much more

[1] https://www.epa.gov/ms-htf/hypoxia-task-force-action-plans

is needed to scale. **A holistic river approach, with additional work among state governments, tribal governments, agricultural, municipal, conservation, and community stakeholders, needs to be ramped up and prioritized.**

One Mississippi continues to advocate for this approach, including the required funding through the appropriations process. We look forward to hearing more and request updates on this approach:

- **How much FY27 appropriations might be needed to fund dedicated staff in each state who are solely focused on Mississippi River issues and the Hypoxia Task Force goals?**
- **How are funds/resources being directed towards communities that need them the most?**

One Mississippi, active in 10 mainstem states, cannot easily track each state's nutrient-loss-reduction plans at a whole-river scale due to GHTF reporting. This lack of standardization prevents meaningful comparison. We continue to urge the Task Force: adopt a coordinated, basin-wide approach, not just state plans.

We appreciate state agencies' on-the-ground engagement, but urge the Task Force to lead whole-river conversations, not just state-by-state updates. **Please prioritize:**

- **Facilitating whole river discussions before and during public meetings**
- **Creating more and regular opportunities for states to share lessons and models basin-wide**
- **Standardize nutrient loss reporting across all states**
- **Provide clear, comparable progress data**

We strongly encourage the Gulf Hypoxia Task Force to explore strategies to incorporate "continuous living cover" agricultural systems into its work.

Continuous living cover (CLC) refers to the presence of living plants aboveground and/or living roots in the soil year-round; CLC can be achieved with perennial species or rotations of summer and winter annual species. CLC farming fundamentally improves the environmental outcomes of agricultural systems: it retains nutrients and soil on the landscape, promotes soil health, can increase soil carbon stocks, and fosters biological diversity. A 2023 analysis found that, under a moderate adoption scenario, CLC systems could reduce nitrogen loss in Minnesota by 23% and reduce soil erosion by 35%, making CLC by far the most impactful strategy for mitigating agricultural pollutants. (For more, see https://fmr.org/clc-report) Market-oriented CLC systems can increase farmer profits, create new opportunities for supply chain businesses, and provide valuable new food ingredients and industrial feedstocks.

A useful precedent for such a pivot is to be seen in the Minnesota Pollution Control Agency's (MPCA) in-process update to the state's Nutrient Reduction Strategy (MN NRS), a comprehensive action planning tool that guides state agencies and public/private partnerships toward the most effective methods to reduce nutrient loading to the Mississippi River and its watershed. We anticipate that MPCA will release the revised MN NRS early in 2026. In the initial drafts released for public review and comment, MPCA included a major new pillar of work centered on CLC agricultural practices. Recognizing the limitations of a traditional cost-share "best management practices" approach, the MPCA has proposed establishing a CLC Task Force to create a statewide strategy to ramp up adoption

of CLC, encompassing advanced agricultural research, commercial development, and farmer adoption. This strategy will build on the work of the University of Minnesota's Forever Green Initiative and its partners in industry and the NGO sector, which have been developing scalable CLC systems targeted for the Upper Midwest. However, there are viable pathways for expanding CLC farming across the rest of the Mississippi River watershed, including winter-hardy oilseeds, perennial rice and other grains, and an array of other regionally appropriate crops and systems, positioning CLC agriculture as a core opportunity for the GHTF writ large.

At a time when funding for farmland conservation and pollution mitigation programs is at an ebb, and when the farm economy itself faces a generational crisis, it is vital that our institutions seriously explore alternative pathways such as market-based continuous living cover. **We, along with our partners at the Forever Green Initiative, would greatly appreciate the opportunity to present on this topic at a future GHTF meeting.**

Climate change must remain a priority for modeling and planning.

We applaud the GHTF efforts to apply a model to climate change scenarios through 2050-2100 and to understand better how climate change affects the dead zone. We would like an update on the Implementation of CGEM and the HyCOM multimedia framework (air, watershed, hydrodynamic, and water quality models). From Climate Central, *"Harmful algal blooms (HABs) involving blue-green algae in freshwater are increasing in frequency and severity across the globe. Warming, heavy rainfall, and nutrient pollution are driving factors behind HABs—and climate change is amplifying the risks."*[2]

Over the years, we have learned from our supporters that many experience the adverse effects of fertilizer and runoff pollution, particularly through harmful algal blooms and beach closures in their states each summer. The issue of harmful algal blooms (HABs) underscores the significance of our work in public health and recreation. **What additional roles will the Task Force play in predicting and modeling the impacts of climate change on the Mississippi River system?**

Despite this year's slightly smaller Dead Zone, we're still nowhere near where we need to be.

Meanwhile, new threats are emerging. As noted by our partners in Louisiana and Texas, proposed fertilizer plants producing so-called "blue" ammonia—a nitrogen-based fertilizer created using natural gas—are being framed as sustainable. In reality, these projects risk adding even more nitrogen pollution to the River system and pushing us further from our goals. We ask that the Gulf Hypoxia Task Force do everything in their power to address the drivers and impacts of hypoxia, build capacity, convene, and push for further reductions in nutrient pollution.

We are grateful and willing to be thought partners alongside you. On behalf of One Mississippi and our Mississippi River Network members, thank you once more for the opportunity to provide written comments on the Gulf Hypoxia Task Force.

[2] https://www.climatecentral.org/climate-matters/harmful-algal-blooms

We respectfully submit these comments before the meeting agenda is shared and hope they can help inform the meeting agenda and future work. We appreciate your time and consideration of these comments.

Sincerely,

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