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February 5, 2026

Mississippi River and Gulf Hypoxia Task Force
Jessica Kramer (Task Force Co-Chair), U.S. Environmental Protection Agency
Mike Naig (Task Force Co-Chair), Iowa Department of Agriculture and Land Stewardship
Submitted via email to Katie Flahive at Flahive.Katie@epa.gov

RE: Comments to the Hypoxia Task Force, February 5, 2026 public meeting

Dear Mississippi River and Gulf Hypoxia Task Force,

Thank you for the opportunity to comment. Healthy Gulf has been tracking and participating in the Hypoxia Task Force since its inception in 1997. While we are glad that each state has committed to shared activities, such as the development of Nutrient Reduction Strategies, we continue to be frustrated with the lack of progress in reducing nitrogen and phosphorus pollution. To this end we offer the following comments.

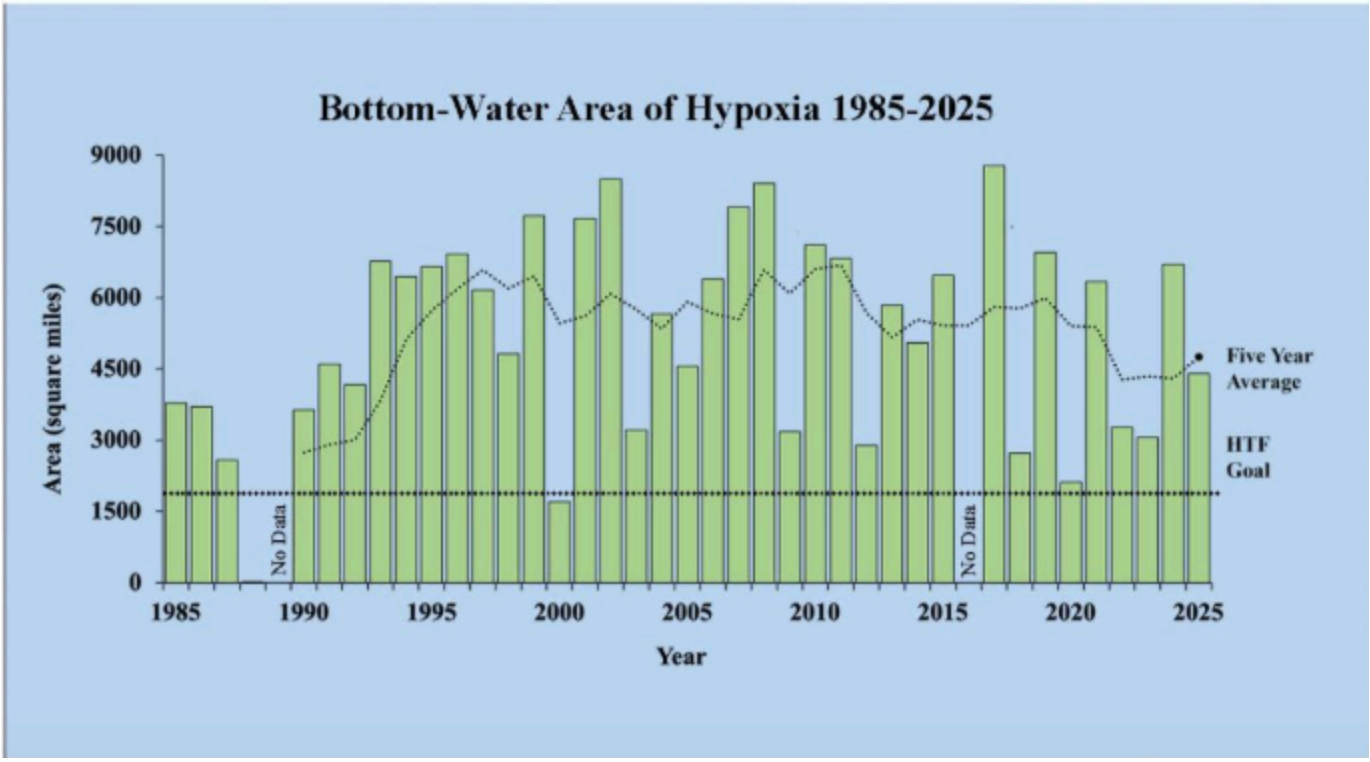
What will happen if we don't reach the 2035 goal?

The Hypoxia Task Forces' goal is to reduce the average size of the Gulf Dead Zone to 1,900 square miles by 2035. This goal was originally to be met by 2015. After not getting even close, the goal was extended by 20 years. It would take $2.7B annually to meet the Task Force goal, if we strategically targeted conservation practices.[1] We need to understand that unless we fundamentally change how we address this pollution, from farming practices to federal and state policies, it is unlikely we will reach this 2035 goal. If we don't reach this goal, our fisherfolk, coastal communities, and Gulf ecosystems will continue to suffer.

With this in mind we request answers to the following:

1. *If the Task Force continues to operate in the same manner it has in the past decades, what is the likelihood that the 2035 goal will be met?*
2. *With the goal less than a decade from now, what will the Task Force do if the goals are not met?*

[1] Rabotyagov SS, Campbell TD, White M, Arnold JG, Atwood J, Norfleet ML, Kling CL, Gassman PW, Valcu A, Richardson J, Turner RE, Rabalais NN. Cost-effective targeting of conservation investments to reduce the northern Gulf of Mexico hypoxic zone. Proc Natl Acad Sci U S A. 2014 Dec 30;111(52):18530-5. doi: 10.1073/pnas.1405837111. Epub 2014 Dec 15. PMID: 25512489; PMCID: PMC4284528. https://pubmed.ncbi.nlm.nih.gov/25512489/



Long-term measured size of the hypoxic zone (green bars) measured during the ship surveys since 1985, including the target goal established by the Mississippi River/Gulf of America Hypoxia Task Force and the 5-year average measured size (black dashed lines). (Credit: NOAA/LUMCON/LSU)

The Task Force should assess proposed fertilizer facilities in the Gulf South, and the impacts to nutrient pollution.

There has been an increase in proposed new fertilizer plants in Louisiana and Texas, touted as “blue” ammonia, which uses methane gas to create nitrogen-based fertilizers. It is worrisome that while the Hypoxia Task Force is attempting to reduce fertilizer pollution runoff, petrochemical companies are doubling-down on fertilizer production, which impacts local communities, as well as water quality throughout the Mississippi River Basin.

Due to this expansion, we request the Task Force do the following:

1. *Encourage states to not only monitor nutrients, but require water quality based permit limits for facilities, especially new facilities, that discharge nutrients, such as sewage treatment plants and industrial facilities, like ammonia and phosphate manufacturers.*
2. *Track fertilizer applications throughout the basin, tracking trends to assess if increased fertilizer production results in increased application.*

The Task Force should issue regular letters of support, as well as funding, to support the annual Gulf hypoxia monitoring program

Every year, it is uncertain whether the annual Hypoxia monitoring cruise will happen. This is funded by NOAA, and other groups, such as the Gulf of America Alliance. If we do not continue this long term monitoring, it will be impossible to measure progress against the stated goal of the Action Plan. While unmanned vehicles might be able to augment these monitoring cruises, they cannot replace them. Additionally, it is vital that not only dissolved oxygen is monitored during this cruise, but also the drivers of the Dead Zone, including nutrients and algae (e.g. chlorophyll a).

We request that the Task Force actively support long-term monitoring of the Gulf Dead Zone. Additionally, the Task Force (or its members that can) should issue letters of support for continued annual monitoring cruises.

The Task Force should encourage all state and federal farm payment policies to have a basic standard of care.

The damage from nonpoint pollution is felt both locally and downstream from the source, such as in the Gulf of Mexico's Dead Zone, an area the size of Massachusetts that is basically devoid of life. To protect water quality, states must design effective controls for the pollution that flows from farms within their borders. Likewise, it makes sense that if a farm is collecting funds from a federal program, some basic standards of care should be required.

The Task Force is uniquely situated to encourage state and federal agencies and programs to require basic standards of care on agricultural land. These basic standards of care should include 1) vegetative buffer requirements, 2) land application setbacks, 3) winter manure application restrictions, 4) livestock exclusion requirements and 5) fall fertilizer restrictions.[2]

We request the Task Force to assess state and federal programs and laws to see how basic standards of care are implemented in participating states. Further, the Task Force should produce recommended policies that could implement these common-sense land conservation practices.

Oral public comments should be accepted virtually at Task Force meetings.

According to the agenda for the Task Force meeting on February 5, 2026, there was a public comment period at 4:30.[3] However when that time came, attendees online were not permitted to submit oral comments. While a mechanism was provided to provide written comments, oral comments are an important part of the process.

We request that virtual attendees are allowed an opportunity to offer oral comments, in addition to written comments, at subsequent public Task Force meetings.

[2] Environmental Law and Policy Center. Cultivating Clean Water: State-Based Regulation of Agricultural Runoff Pollution, 2010. https://www.iaenvironment.org/webres/File/News%20%26%20Resources/Publications/Cultivating_Clean_Water_Report.pdf
[3] https://www.epa.gov/system/files/documents/2026-01/htf-2026-39th-public-meeting_508.pdf

Thank you for the opportunity to comment and participate in the Hypoxia Task Force meeting. I would be happy to follow up on any of these issues. I can be contacted at matt@healthygulf.org.

Sincerely,

Matt Rota
Senior Policy Director
Healthy Gulf