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September 8, 2000

Mississippi River/Gulf of Mexico Task Force
c/o John Wilson (4503F)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Dear Task Force Members:

Thank you for the opportunity to comment on Mississippi River/Gulf of Mexico Watershed Nutrient Task Force July 11, 2000 *Draft Plan of Action for Reducing, Mitigating, and Controlling Hypoxia in the Northern Gulf of Mexico*. The Association of Metropolitan Sewerage Agencies (AMSA) represents the interests of 245 of the country's publicly-owned wastewater treatment agencies, which collectively serve the majority of the sewered population in the United States, and treat and reclaim more than 18 billion gallons of wastewater each day. In addition to their primary responsibility for collecting and treating the Nation's domestic, commercial, and industrial wastewater, AMSA member agencies play a major part in their local communities, often leading watershed management efforts, promoting pollution prevention, water conservation, and recycling, and developing urban stormwater management programs.

The hypoxia in the Gulf of Mexico is a serious and challenging problem which must be addressed. As front-line water quality managers, AMSA members foremost goals are to protect public health and our nation's valuable water resources by treating and reclaiming wastewater to meet the ambitious goals of the Clean Water Act. As such, AMSA supports the development of plan to address hypoxia in the Gulf. However, AMSA has significant concerns with the Task Force's draft Action Plan which relies primarily on subjective judgements regarding:

- The impacts of nutrient loadings in the upper reaches of the Basin on the hypoxia in the Gulf of Mexico.

- The ability of the basin to implement nonpoint source reductions without a predetermined plan for insuring their implementation.
- The effects of other variables such as flood control initiatives, freshwater flows, suspended sediment, and other oxygen demanding substances have on controlling the degree of hypoxia in the Gulf.

The Gulf Strategy does not appear to have the quantitative assessments needed to demonstrate to the public the mechanisms driving the hypoxia, nor the level of controls needed to effectively reduce the hypoxia to natural or acceptable levels. The Chesapeake Bay Program acknowledges that only a percentage of nutrient loadings above the fall lines actually make it to the estuary. The Gulf Strategy does not discuss this issue.

The Gulf Strategy acknowledges that a 40% reduction in nutrients should result in nutrient levels reminiscent of the 1970s, however the program fails to address whether the other factors which affect hypoxia would negate these nutrient reductions and therefore not result in meaningful reductions in hypoxia.

The Gulf Strategy could borrow upon the successes of the Chesapeake Bay Program which has spent considerable resources at developing the science, models and public education efforts necessary to successfully attack a problem associated with a large geographic area and with widely diverse stakeholder, some of whom do not associate with the resource being protected.

AMSA is also concerned over the emphasis placed in the Strategy on municipal point sources (POTWs) in light of the fact that they constitute a very small percentage of the nutrient loads in the Mississippi Basin and that the nutrient reductions are more costly than controls on non-point sources (NPS). Knowledge gained in the Chesapeake Bay has shown that only a small percentage of above fall line loads of nutrients are actually delivered to the estuarine system. This conclusion is particularly true for nitrogen due to denitrification in aquatic systems. Given the huge expanse of the Mississippi Basin as compared to the Chesapeake Bay Basin, the delivered loads in the far reaches of the Mississippi are even less likely to reach the Gulf. It is essential that the Gulf Strategy have a more quantitative approach to addressing these issues if it will be successful at developing grass roots support for more costly environmental controls in the far reaches of the Basin.

As indicated in the Strategy, NPS are the largest contributor of nutrients to the Mississippi, this includes atmospheric, urban and agricultural runoff, etc. It is essential that the Gulf Strategy model these loads, estimate the reductions which are achievable and model the impacts of those reductions on Gulf hypoxia. The success of the Gulf Strategy relies on the NPS load reductions to occur because without those reductions the point source reductions will be futile. The most difficult activity is establishing a

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framework which will insure that the NPS reductions can be implemented. Failure to have this as part of the strategy, undermines the achievability of the program. Failure to insure that the NPS loading reductions are achievable questions the wisdom of spending billions of dollars on point source controls. It is clear that given the relatively minor impact associated with point sources, that it is essential that the effectiveness of the NPS controls be verified before widespread requirements to install nutrient removal at POTWs are implemented in the basin.

It appears that the Strategy recognizes that the alterations made to the Mississippi Basin may preclude a return to "pristine" conditions. This acknowledgment may mean that uses and criteria need modification. It is imperative that the Federal and State governments acknowledge the achievability of the program and promote the establishment of accurate use designations and criteria as part of the strategy.

It is also important that the Federal and State governments invest in the Gulf Strategy in a similar fashion to the Chesapeake Bay. Federal and State funding for science as well as point and non-point source controls should be provided. The current state of the Strategy provides a starting point for the program, however significantly more sophisticated data analyses is necessary to provide the stakeholder with the necessary assurances that the tremendous resources necessary for the program will provide environmentally meaningful improvements. If you have any questions, please call me at 757/460-4243 or Mark Hoeke at 202/833-9106.

Sincerely,

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

Norm LeBlanc
Chair, AMSA Water Quality Committee

cc: Geoff Grubbs, Office of Science and Technology
Mike Cook, Office of Wastewater Management

