Friends of the Kankakee
1773 Selo Dr., Schererville, IN 46375

Mississippi River/Gulf of Mexico Action Plan (4503F)
c/o U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Sirs and Madams,

September 2, 2000

The Kankakee River basin is part of the Mississippi watershed and we recently formed the Friends of the Kankakee ot address the myriad of problems we see in the watershed here.

The Mississippi River watershed drains approximately 40 percent of the United States, carrying nutrients, sediment and other pollution from the landscape to the Gulf. Once they reach the Gulf, the excess nutrients cause algal blooms, which use nearly all the oxygen in the water and so produce a large area, which is depleted of oxygen or "hypoxic." Most aquatic life cannot survive when oxygen levels dip too low so a "dead zone" - or area devoid of aquatic life - forms. Each spring and summer, the dead zone is recreated as nutrient rich, low-oxygen waters reach the Gulf.

Nitrogen is the nutrient most severely impacting the Mississippi River and Gulf systems. Nitrate loads in the Mississippi River have increased 300 percent in the last 30 years, to nearly 1 million tons per year. About 90 percent of the nitrogen deposited in the Gulf of Mexico comes from non-point sources such as agriculture, urban runoff, and atmospheric deposition. Most of the nitrogen comes from farmlands where large amounts of nitrogen from fertilizer and manure are applied to agricultural lands.

We feel the EPA's overall strategy for combating the hypoxia problem could be more effective. It fails to address some significant sources of pollution in the Gulf of Mexico and relies too heavily on federal farm conservation programs as the method for reducing nitrogen pollution in the Mississippi basin.

It is essential that the plan delivers significant benefits for states in the upper river and its tributaries and that these benefits complement other efforts to improve water quality. It is also essential that the most effective solutions to alleviating hypoxia be given higher precedence.

There should be a numeric nutrient reduction goal set for the Gulf of Mexico. A numeric goal is necessary to provide a benchmark against which to measure the success of actions taken to reduce hypoxia.

We support the use of cooperative, non-regulatory approaches to addressing non-point sources of nitrogen pollution; however, strong implementation and enforcement of existing regulatory standards is necessary for addressing point source discharges. These point source discharges must include contaminated stormwater, municipal sewer systems, large animal feedlots, and

wetland fills. All NPDES permits for point source dischargers in the Mississippi basin should be re-issued on time and permits for those facilities should also include numeric limitations consistent with nutrient reduction goals.

The Committee on Environment and Natural Resources recommended the restoration of 5 million acres of wetlands. The Action Plan needs to include these recommendations in its list of basin-wide goals.

Additional funding for the Corps' wetlands permitting program must be included as well as additional funding for wetlands restoration.

State and federal programs such as the Wetlands Reserve Program and Clean Water Act 319 resources must be focused on targeted watersheds. The Action Plan must clearly state that federal agencies will work together to target programs on watersheds that have been identified as major contributors to nitrogen pollution entering the Mississippi River,
whether or not the states have targeted these watersheds.

The draft states that by fall 2003 the Corps should assess potential nutrient reduction actions that could be achieved by modifying Corps projects. This is unacceptable because the Corps is fully capable of assessing actions that can be taken to modify projects to reduce nitrogen pollution at present funding levels.

The Corps must commit to coordinated, comprehensive oversight of all its regulatory and civil works programs within the Mississippi basin to ensure that gains in nitrogen reductions are not offset by projects or permitting practices that increase nitrogen inputs. The Corps can address the issue of nutrient pollution today by strengthening and asking for more funding for its wetlands regulatory permitting program.

Specific milestones are key to the success of the Action Plan. The draft Plan appears to call for indicators to be chosen based purely on economics. The extent of the Dead Zone problem dictates that we use the most effective approaches. Cost and other such factors should be included in this equation only to determine the most efficient solutions.

We appreciate the opportunity to comment on the Draft Action Plan for Reducing, Mitigating, and Controlling Hypoxia in the Northern Gulf of Mexico and we urge you to incorporate our comments into the final action plan.

Jim Sweeney

Jim Sweeney, president
Friends of the Kankakee