December 2, 2023

To: LWV UMRR Board

From: Gretchen Sabel, Communications Director, LWV UMRR

Regarding: Comment letter sent to US EPA for inclusion in Gulf Hypoxia Task Force meeting on Dec 6

The Gulf Hypoxia Task Force meets annually. This group includes a number of federal agencies and representatives from the 11 Mississippi River states (<https://www.epa.gov/ms-htf/task-force-members> ). The next meeting is on December 6, in Fayetteville, Arkansas. Virtual attendance is also allowed and I have registered to attend virtually. Public comment is allowed for in-person attendees; virtual attendees are allowed to submit written comments. These comments were due on November 27.

At the November 20 Action Committee meeting, I suggested that LWV UMRR submit written comments to the Gulf Hypoxia Task Force, and volunteered to write these comments. The Action Committee approved me doing this.

I developed comments based on [a paper that outlines shortcomings in agricultural nonpoint source pollution control policy](Confronting%20our%20Agricultural%20Nonpoint%20Source%20Control%20Policy%20Problem%20-%20Stephenson%20-%202022%20-%20JAWRA%20Journal%20of%20the%20American%20Water%20Resources%20Association%20-%20Wiley%20Online%20Library). This paper, published in 2022, points out that more money that isn’t targeted to the highest impact problems, whether the measures are voluntary or required, will not be effective or sufficient to bring about the needed reduction in nutrient loss.

Following is the email I sent to US EPA for inclusion in the meeting packet for the December 6 meeting of the Gulf Hypoxia Task Force. This position is in accordance with LWV US positions on water and good government. I completed the LWV UMRR Action Reporting form: <https://youtu.be/KNVQMarT-5c?si=2gNHw2qqG9aaGEqf>

----- Forwarded Message -----

**From:** Gretchen Sabel <gpsabel@yahoo.com>

**To:** Flahive Katie (she/her/hers) <flahive.katie@epa.gov>

**Sent:** Monday, November 27, 2023 at 03:43:15 PM CST

**Subject:** Comments to the Gulf Hypoxia Task Force for consideration at the December 6 meeting

The League of Women Voters Upper Mississippi River Region is a multi-state organization (Minnesota, Wisconsin, Iowa, Illinois and Missouri), joining local LWV Leagues across five states to advocate for the Mississippi River.  We do this through educational webinars on key issues in the basin, and leading LWV advocacy on the federal Farm Bill. 

At the ten year point, it seems that the approach that states have been following for nutrient reduction is not as effective as it could be.  Change is needed because the current policies and programs are not bringing about the reductions needed.  The current system relies on voluntary involvement and tallies installed practices rather than measured outcomes, and incentivizes producers to install practices they are willing to do rather than more difficult practices that would lead to quantifiable NPS load reductions.  The success of technical service providers is measured in terms of BMPs installed, not targeted BMPs installed or actual reductions in nutrient loading.

Policy reform is needed and the Hypoxia Task Force could lead that reform.  Funding is still a critical necessity, but the focus needs to shift from practices to “outcome-based” programs so that both producers and service providers are motivated to seek out and implement those practices that result in the largest nonpoint source reductions.  This will require change to familiar program and reward systems that will be hard to implement.  And we will need to take steps toward mandatory measures in critical areas where willing partners are not able to get the job done.

A shift toward outcome-based program design is the necessary end goal of this work – we must work to reduce nutrient loss and demonstrate effectiveness of targeting practices that results in better water quality.

Thank you for this opportunity to speak.

Gretchen Sabel, Communications Director

League of Women Voters Upper Mississippi River Region

[http://www.lwvumrr.org](http://www.lwvumrr.org/)