EcoLaw Institute Inc.
Research

Noah S. Root
5001 S. Hickory Ave. #127
Broken Arrow, Oklahoma 74011
Noahroot@aol.com
(918) 451-597

July 26, 1999

Gulf of Mexico Hypoxia Working Group
National Center for Coastal Ocean Science
WS 13446 55MC4
1305 East-West Highway
Silver Spring, MD 20910

RE: A Public Comment on the Hypoxia Assessment Reports

Dear Working Group:

I appreciate your work on the reports but was there a news release? There seems to be not much public awareness of the "dead zone" problem and proposed solutions. I notice that the agribusiness news apparently has not mentioned these public reports. Scientific communication with the public is essential as the science itself. I accidentally found out about the reports at the NOAA and EPA web sites.

Some states are still attempting to drain wetlands for crops even as wetland restoration is proposed in the reports. Public awareness is the beginning of enforcement of watershed solutions. Denial is still an option of a social-political system that has not coped with the prospect of more ozone depletion and a runaway greenhouse effect. Climate change is likely to enhance the Gulf hypoxia problem.

To add the cost of pollution mitigation to a product (including public education) is uncommon common sense. There is a hidden cost in the price of cheap food. The largest share of the polluting nutrients is the combination of growing cheap grain to feed large numbers of confined meat animals producing concentrated manure that also produces water pollution. Why is this legal?

None of the reports mentioned the expansion of organic production. It doesn't use genetic engineering, antibiotics, hormones or synthetic nitrogen fertilizer. There is a May, 1999 report on the web by Rick Welch at the Henry A. Wallace Institute for Alternative Agriculture: THE ECONOMICS OF ORGANIC GRAIN AND SOYBEAN PRODUTION IN THE MIDWESTERN UNITED STATES, >http://www.hawiaa.org/pspr13.htm<

From page 58 of the Topic 6 report, EVALUATION OF ECONOMIC COSTS AND BENEFITS OF METHODS FOR REDUCING NUTRIENT LOADS TO THE GULF OF MEXICO: "Livestock producers would bear more costly feed grain input costs as prices increase under nitrogen loss resrictions. Consumers of basic commodities, and the finished food and fiber products derived from them, would suffer some loss from price increases caused by production changes and acreage restored to wetlands."

It may be somewhat misleading to refer to animal manure as a nutrient when it can contain heavy metals, pesticides, antibiotics and other additives. Years ago it was noticed when cattle were first fed antibiotics, the cow patties took longer to biodegrade. The problem with exporting cheap meat and grain is the pollution costs stay here for a long time as we are learning.

Cleaning up the dead zones may be helped by a DIET FOR A NEW AMERICA as the book title by John Robbins suggested. Tulsa's water supply is downstream from many polluting hog or chicken confined animal feeding operations(CAFO's). The city is paying the cost of cheap meat by a treatment for excessive phosphorus and nitrogen producing algae in the water supply lake. Arsenic was found to be a formula ingredient in poultry feed that also ends up in the water and land.

Will legal action to clean up the Gulf hypoxia zone also help urban water supply problems? This should be part of any solution presented to Congress. We all live downstream.

Sincerely,

Noah S. Root

Noah S. Root
Researcher
EcoLaw Institute Inc.