Illinois Association of Drainage Districts

201 West Fairground Avenue, Hillsboro, Illinois 62049 Telephone 217-532-5457 FAX 217-532-5468

Improving land and water management by sharing information and ideas.

Gulf of Hypoxia Working Group
National Centers for Coastal Ocean Science
WS 13446 SSMC4
1305, East-West Highway
Silver Springs, Maryland 20910

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To Members of the Working Group:

Please accept the following comments regarding the Gulf of Mexico Hypoxia Assessment made on behalf of the Illinois Association of Drainage Districts (IADD). The IADD membership owns the land and manages water on one-quarter of the state's farmland. IADD also represents consulting engineers and drainage districts that operate in completely urbanized areas. In rural and urban areas, our membership is directly involved in land use decisions that can improve water quality. We have followed the issue of hypoxia in the Gulf of Mexico over the past three years. Following is a summary of our review of the Gulf of Mexico Hypoxia Assessment.

Science

Background: The Assessment tested only one hypothesis. The hypothesis held that hypoxia in the Gulf of Mexico is caused by nutrient overloads from freshwater sources – the Mississippi River Basin (more than 42% of our nation's watershed) and that hypoxia has led to negative economic impacts in the gulf.

IADD Comment: The Assessment falls short of exploring the many factors and conditions that create hypoxia. There are more than 80 possible hypotheses that could explain gulf hypoxia. Also, only selected data sets were used to test the hypothesis – versus following the scientific method of using all available data sets related to the topic of hypoxia.

IADD Comment: The hypothesis was not proven in the six reports comprising the Assessment. For example; data shows that at least 70% of the water from the Mississippi River flows east – away from the Gulf of Mexico where the hypoxic zone is located; there has been a reduction in nitrate (the aqueous version of Nitrogen, "suspect" nutrient of the study) loads in the Illinois and Upper Mississippi rivers over time; there have been no negative economic impacts on fisheries in the gulf attributed to hypoxia.

Policy

Background: The Assessment and accompanying documents recommended that changes to current water laws be made based on the conclusions of the assessment.

IADD Comment: The science was inadequate, therefore the Assessment is not a valid basis for any policy-related action. Specifically, there should be no change to the Clean Water Act or creation/alteration of existing watershed programs as a reaction to the hypoxia in the Gulf of Mexico or what some have called the "dead zone."

Summary Recommendations

Background: Hypoxia is a naturally occurring phenomenon in more than 40 locations around the globe. For example; much of the Pacific Ocean is hypoxic with a distinct band of hypoxia that lines the west coast of North America from Oregon south along Latin America to the middle of Chile.

IADD Recommendations: 1. We encourage exploring many hypotheses and complete data sets in further study of the hypoxia phenomenon. 2. We encourage the involvement of state-based scientists representing universities, industry, natural surveys and state agencies. 3. We encourage the involvement of state-based agency, university and business economists to model cost-benefit scenarios. 4. We encourage extensive public involvement – led by the Congress – in review and discussion of the findings.

Thank you for your attention. Please call with questions, 217-532-5457.

cc: Members of Congress

Heather Hampton Knodle