December 6, 2023

RE: Oral Comments Delivered at the 38th Public Meeting of the Gulf Hypoxia Task Force

Good afternoon. My name is Alicia Vasto, and I am the Water Program Director for the Iowa Environmental Council. We are a statewide nonprofit coalition with a mission to create a just, healthy environment and sustainable future for all Iowans.

I am here in person to meet you and comment because I don't believe that my words or the calls from my fellow Iowans to take substantive action on nutrient pollution are being taken seriously by this Task Force. That feeling is reinforced and validated learning that you had a presentation from the Farm Bureau again this year, but environmental groups and members of the public still only get a few minutes to speak every year.

This year is the 10th anniversary of Iowa's Nutrient Reduction Strategy. Last fall, my organization asked the state agencies to do a comprehensive analysis and update of the NRS at the 10 year mark. They did not. It is common sense that a real, effective strategy requires evaluation and regular updates based on lessons learned. The Task Force and EPA should require states to do regular evaluation and updates to show how they will make actual progress on nutrient pollution reduction and incorporate changing climactic conditions. States should be held accountable for failure to reach goals and refusal to adapt a failing strategy.

While Iowa state agencies and agriculture groups have been celebrating so-called progress made in the 10 years since the adoption of the Iowa NRS, our state continues to suffer from contaminated waterways and increasing costs of drinking water treatment. Isolated success stories do not reflect the scale of the pollution problem in Iowa and the lack of progress toward actual water quality goals.

People have raised the Polk County "batch and build" initiative many times in these meetings as an example of success. We support the local staff that have worked hard to make this innovative model effective and impactful. The county installed 136 bioreactors and saturated buffers through batch and build from 2021 to 2022. However, the reality is that we need more than 1,000 bioreactors and saturated buffers installed every year across the state of Iowa in order to reach the goals of the Nutrient Reduction Strategy in 100 years. This demonstrates that individual edge-of-field practices are merely Band-Aids to an ever-increasing problem.

From 2017 to 2021, commercial nitrogen application to corn following soybeans averaged 175 lbs/acre in Iowa. For continuous corn, average application was 202 lbs/acre. Those amounts far exceed maximum return to nitrogen rates and represent application over 24 million acres of row crop ground in Iowa. And that doesn't even include manure application rates. How can we possibly reach nutrient reduction goals if this level of fertilizer application is allowed year after year without question? It is impossible.

The Gulf Hypoxia Task Force called for an interim nutrient reduction goal of 20% by 2025. We have one year left to make this happen. What will the Task Force do when it fails to meet this interim goal? It appears from the latest report to Congress that the idea is to change to a new measurement methodology that uses provisional data, leading to ambiguity on the metrics. When will we see the EPA take its role on this Task Force seriously and embark on a coordinated, whole-basin approach to nutrient pollution reduction, including a TMDL and updated action plan?

We cannot make progress on nutrient reduction without clear standards, benchmarks, timelines, and accountability. We've known about the Dead Zone since the 1970s. The Hypoxia Task Force was created when I was 8 years old. When will there be real accountability to Iowans and our downstream neighbors that any efforts over the past three to five decades have actually had an impact on water quality or the size of the Dead Zone.

Iowans are suffering due to the lack of accountability and the Task Force's inability to adequately address the problem. EPA must step up.