



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

NOV 06 2014

OFFICE OF WATER

MEMORANDUM

SUBJECT: Response to Office of Inspector General Final Report No. 14-P0348, "Nutrient Pollution: EPA Needs to Work With States to Develop Strategies for Monitoring the Impact of State Activities on the Gulf of Mexico Hypoxic Zone" dated September 3, 2014

FROM: Kenneth J. Kopocis *Kenneth J. Kopocis*
Deputy Assistant Administrator

TO: Arthur A. Elkins, Jr.
Inspector General

Thank you for the opportunity to respond to the issues and recommendation in the subject audit report. In our Memorandum dated July 28, 2014, the Office of Water concurred with the recommendation of the draft report and provided corrective actions, along with estimated completion dates, that address the recommendation. We also offered edits to the draft report regarding incorrect programmatic information. The final report states that your Office considers the Office of Water's proposed corrective actions to be responsive and the recommendation resolved. The purpose of this Memorandum is to concur with the recommendation of the final report, and to again provide corrections to certain programmatic information contained within the report, as follows:

Page 2, Figure 1 - The measured size of the Gulf hypoxic zone in 2013 was 15,120 square kilometers, as reported by the National Oceanic and Atmospheric Administration. See http://www.noaa.gov/newsroom/stories/2013/2013029_deadzone.html. The figure in your report depicts the 2013 zone size at approximately 22,000 square kilometers.

Page 4, first paragraph under "EPA's Approach to Reduce the Gulf of Mexico Hypoxic Zone" - The first sentence in the paragraph does not accurately describe the various efforts being undertaken by the Office of Water nationally, including within the Mississippi River Basin, to reduce excess nitrogen and phosphorus in surface waters. EPA's actions are not solely limited to working with states to develop and implement nutrient reduction frameworks/strategies, as the report implies. Specific actions being undertaken with our state and other federal agency partners include:

- Providing states with technical guidance and resources to help them develop water quality criteria for nitrogen and phosphorus as part of their water quality standards regulations for surface waters.
- Supporting states as they engage in a collaborative approach among state and federal partners and stakeholders to achieve near-term reductions in nitrogen and phosphorus pollution while

they make progress on their long term nutrient reduction strategies or frameworks. Specific activities in the framework approach include:

- Working with states to identify and prioritize waters impaired by nitrogen and phosphorus pollution for restoration and protection.
<http://water.epa.gov/lawsregs/lawsguidance/cwa/tmdl/overview.cfm>
 - Awarding grants to states for operating nonpoint source management programs and water pollution control programs.
 - Providing funding for the construction and upgrading of municipal wastewater facilities and the implementation of nonpoint source pollution control and estuary protection projects.
- Providing information to the public on nutrient pollution and related issues.
<http://www2.epa.gov/nutrientpollution>
 - Conducting and/or supporting research on nitrogen and phosphorus pollution-related topics.
<http://www2.epa.gov/water-research/nutrients-management-research>.

Page 10 - Table 1 does not reflect the progress being made by the Hypoxia Task Force states on development of statewide nutrient reduction strategies. Below is an updated Table 1 with the status of strategy development in the Task Force states as of October 28, 2014.

Task Force State	Strategy Status	Nutrient Reduction Goal	Timeframe for Achieving Reduction Goal
Arkansas	Draft strategy	Not at this time	Not at this time
Illinois	Draft strategy	15% Nitrate-N & 25% P Reduction	2025
Indiana	Draft strategy	Not at this time	Not at this time
Iowa	Completed strategy	45% N & P Reduction-- Nonpoint Sources: 41% N and 29% P; Point Sources: 4% N and 16% P	Not at this time
Kentucky	Draft strategy	Not at this time	Not at this time
Louisiana	Completed strategy	Not at this time	Not at this time
Minnesota	Completed strategy	45% N and 45% P (current P reduction progress is estimated at 33%)	2025 for P; 2040 for N with a 20% milestone by 2025 (baseline is the 1980-96 average)
Mississippi	Completed strategy	Not at this time; strategy Focuses on Leveraging Resources and Collecting Data to Achieve and Track Nutrient Reductions	Not at this time; process for revising document using adaptive management
Missouri	Draft strategy	To be determined through collaborative adaptive management	To be determined through collaborative adaptive management
Ohio	Completed strategy	Not at this time	Not at this time
Tennessee	Draft strategy	Not at this time	Not at this time
Wisconsin	Completed strategy	45% P Reduction, with 77% of that goal from Nonpoint Source reductions and 23% from Point Sources	Since 1995, Wisconsin estimates a 23% reduction has already been achieved. If reduction rates can be maintained, if not improved, a goal of 2035 is possible.

CONTACT INFORMATION

If you have any questions regarding this response, please contact Hazel Groman, Hypoxia Team Leader, Office of Water, Oceans, and Watersheds/Assessment and Watershed Protection Division at (202) 566-1219.

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