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May 21, 2004

James D. Watkins, Admiral U.S. Navy (Retired) Chairman, U.S. Commission On Ocean Policy 1120 20th Street, NW, Suite 200 N Washington, D.C. 20036

Dear Admiral Watkins:

The citizens of Iowa thank you for the opportunity to comment upon the Preliminary Report of the U.S. Commission on Ocean Policy, Governor's Draft, Washington, D.C., April, 2004. We who live in the heart of the country are tied to the oceans by trade and by the watersheds that drain to the oceans. Upon casual review, it might seem a bit strange for the Governor of a mid-continent state such as Iowa to view ocean policy as relevant. But many of these issues are clearly directly related to Iowa, especially non-point pollution, farm policy, nutrients, transportation and trade, and ecosystem-based management.

Let me begin by praising this process. We need to look broadly at our natural resources. They deserve our attention. These resources are vital to our economic system and a significant factor to our quality of life. Iowa is often called "The Land Between Two Rivers," with the Missouri River and the Mississippi River defining our borders and our state. Most of Iowa is a watershed for one or the other of these great rivers. More than twenty-eight other watershed states have contributed to the quality of the water by the time the Missouri joins the Mississippi south of St. Louis and then flows into the Gulf of Mexico.

We appreciate the Commission's efforts during the past two years to evaluate the status of our coastal and ocean environments. Problems common to us all were identified, including degraded conditions of wetlands, water quality, wildlife habitat and fishery resources. These problems require immediate attention, whether inland or coastal.

The report is comprehensive, thoughtful, insightful and well crafted. The Preliminary Ocean Policy reflects a balanced look at many issues, as it must. Last November, we convened the Iowa Water Summit to compile the ideas of experts, interested stakeholders and citizens regarding priorities and strategies for management and protection of our water resources. I am pleased that many of the themes that emerged from that process are echoed in this report. Let me highlight a few to add importance to some of the many recommendations from Iowa's perspective.



The vision endorsed in the report of managing our oceans with an ecosystem based management approach is appropriate. It requires a science based approach with appropriate, credible, coordinated monitoring and accessible databases. Iowa currently cooperates with the USGS stream gauging program and USGS and EPA water monitoring programs. In the past five years, we have greatly expanded our monitoring of inland stream and lake waters. We would welcome proposed monitoring changes, especially on the Mississippi and Missouri rivers, and Iowa would adjust its monitoring program to better coordinate with a national system.

The report endorses a watershed approach. This naturally falls out of a science-based ecosystem approach as it acknowledges that water quality and quantity issues are hydrologically connected between upstream and downstream areas. This approach recognizes that these issues have a cumulative impact from various landscapes and all activities. The functioning of the watershed is what binds Iowa to the water resource issues at the Gulf of Mexico. Recommendation 14-8 instructs the National Ocean Council to establish significant reduction of non-point source pollution in all impaired coastal watersheds as a national goal, and set specific, measurable objectives focused on meeting human health and ecosystem based water quality standards. The recommendation is focused only on watersheds directly tied to the coast, and there is no clear recommendation with regard to inland watersheds such as the Mississippi-Missouri Basin. Iowa delivers huge amounts of nutrients and sediment to the Gulf. Therefore, a similar recommendation should address the unique controls necessary for this watershed.

Nutrients were a major issue at our Iowa Water Summit. Nutrients come from a variety of sources including stormwater runoff, wastewater treatment facilities, manures, atmospheric deposition and row-cropped land. Recommendations regarding stormwater and wastewater treatment facilities and animal waste highlight real needs. The report recognizes the role of Cornbelt states in delivering nutrients to the Gulf. For Iowa, we have learned that there are many possible sources of nutrients, but development of a nutrient budget in Iowa indicates that the largest potential contributors are nutrients from the natural soil and from commercial fertilizers. This is probably true for much of the Cornbelt. The report should highlight a recommendation similar to 14-3 for management practices that protect waters from these nutrients through land and crop management techniques. This is most important for reducing nitrogen coming from the Upper Mississippi River Basin. We believe that a focused approach towards reducing the impacts of Midwest row-cropped lands would contribute significantly to a decrease in Gulf hypoxia. Our Water Summit recommendations also call for establishing nutrient standards as an important step towards identifying appropriate goals, and establishing goals in the Gulf would help us in this regard.

The ecosystem vision expressed in this report should also be applied to management of the rivers that flow to the oceans. While these may be out of the scope of this report, the river management of the Mississippi and Missouri rivers is certainly relevant to the delivery of nutrients to the Gulf. Similarly, water management of individual fields in relation to drainage systems has a geographically distant, but clearly close tie to Gulf management. These relationships were not drawn in the report, but could have been.

The issue of invasive species is also an overriding concern in Iowa. Two areas need addressing here: intentional and unintentional introductions. To handle intentional introductions support should be given to the National Aquatic Invasive Species Act (NAISA, S. 525 and H.R. 1080) currently before Congress. The most important component of this legislation is the establishment of a national screening process for approval before intentionally introducing nonindigenous species of aquatic flora and fauna into this country. This legislation is supported by the 28 - state Mississippi Interstate Cooperative Resource Association and the American Sportfishing Association, and is much needed to safeguard native species and habitats from invasives. Examples of nuisance aquatic species adversely impacting Iowa's aquatic communities are the silver carp and big head carp, both of which were legally and intentionally brought into this country by the catfish producers in the state of Arkansas.

Our biggest challenge with unintentional introductions is focused around ballast water in the Great Lakes. Again language on ballast water in the NAISA legislation mentioned above is a move in the right direction. Many challenges in the way of aquatic invasive species in the 28-state Mississippi River basin is result of ballast water. Zebra mussels are the flagship ballast water derived species for the basin and certainly in Iowa. Here they are very much threatening survival of listed endangered mussel species, reducing populations of commercially valuable mussel species, clogging water intakes, and hampering recreational navigation by encrusting boat hulls and lower units of motors. Established invasives in the Mississippi River that will soon be impacting native fisheries include round goby, ruff, and spiny water flea. Recommendations 17-1 and 17-2 in the report are very much supported.

We support the move to sustainable marine fisheries. There has been a history of overallocation of fish stocks, particularly to the commercial industry. Marine fisheries are vital to Iowa for two important reasons: they provide a healthy diet alternative and the \$20 billion sport fishing industry generates millions of dollars into the Federal Aid to Fish Restoration (Wallop-Breaux) program by way of excise tax on sport fishing equipment and boat fuel gas tax. Iowa annually receives over \$3.5 million in Federal Aid dollars through this program which are used to manage the state's fisheries and improve fishing opportunities for Iowans.

Iowa is committed to improving our water quality through comprehensive and coordinated efforts. We support science-based management and policy development. Sharing information and knowledge is imperative if we are to make a difference. This Preliminary Report of the U.S. Commission on Ocean Policy gives all of us an unprecedented opportunity to focus on the precious resource that binds us all.

Again, we appreciate this opportunity to record our opinions and recommendation in support of a better future for this country and this earth.

Sincerely,

homas J. Vilsack

Governor