



POTASH & PHOSPHATE INSTITUTE

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Southeast Director

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April 22, 2005

U.S. Environmental Protection Agency
Office of Water/Office of Science and Technology
Health and Ecological Criteria Division (MC 4304 T)
Response to Region 4 White Paper
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Sir/Madame:

The August 4, 2004 evaluation of the nutrient (nitrogen and phosphorus) causes of hypoxia in the northern Gulf of Mexico was recently released by the EPA region 4 office and notice of the public availability of the August 2004 report and the open comment period was received on March 25, 2004 by email correspondence from John Ansu (Tetratex: EPA contractor). The Potash & Phosphate Institute (PPI) appreciates the opportunity to offer constructive comments on this important document. PPI is a not-for-profit organization with its primary support from producers of phosphate and/or potash. Its scientists work with universities, agencies, and industry cooperators to advance appropriate nutrient use in crop production through development and promotion of scientific information.

Two preliminary versions of the new EPA evaluation (dated January and April 2004) pointed out serious scientific flaws in the nutrient interpretations in the six 1999 CENR reports and in other published papers, related to the prevailing hypoxia and nitrogen-caused paradigm. The August 2004 evaluation does not include important discussions of a number of scientific shortcomings noted in the January and April 2004 versions. Among them is that the previous science has failed to show a significant cause and effect relationship between the annual N (total N, inorganic N) discharge to the Gulf and annual size of hypoxic area. There is a need to better capture some of the constructive criticisms from the January and April 2004 versions of the EPA evaluation report, in order to advance the scientific understanding of the nutrient factors associated with harmful algal blooms and hypoxia development in the Gulf of Mexico. We will not dwell on the January and April 2004 reports, but instead will address the majority of our scientific comments to the August 2004 evaluation, which will be hereafter referred to as the "AUGR4E".

Members

Agrium Inc.
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Yara International

Specific scientific questions, criticisms, and references are provided in the accompanying document. Our intent is to encourage stronger scientific understanding and interpretation of the factors affecting hypoxia in the northern Gulf of Mexico. Our comments are provided for consideration and objective response by: 1) EPA scientists and administrators, 2) the Mississippi River/Gulf of Mexico Watershed Nutrient Task Force, and 3) the AUGR4E report peer review panel.

Please record our scientific comments and reply to confirm receipt of this communication.

Thank you.

Sincerely,

A handwritten signature in black ink that reads "Clifford S. Snyder". The signature is written in a cursive style with a large initial 'C' and 'S'.

Clifford S. Snyder, Ph.D.
PPI Southeast Director

CC: Dr. Paul Fixen