



March 30, 2022

Mr. Chris Colclasure
Natural Resources Division
Arkansas Department of Agriculture
10421 W Markham St
Little Rock, Arkansas 72205

Dear Director Colclasure,

The Natural Resources Conservation Service (NRCS) is proud to partner with the Arkansas Department of Agriculture Natural Resources Division and we appreciate the opportunity to provide input on the draft Arkansas' Nutrient Reduction Strategy (NRS).

We are providing our comments and recommendations for your consideration regarding the draft NRS strategy which was presented to stakeholders on March 2, 2022. The NRS prioritization of HUCs strongly impacts our work with partners and landowners through our Mississippi River Basin Initiative (MRBI). We appreciate the accommodations that have taken place to incorporate MRBI focus areas to a limited extent which makes the current NRS draft more palatable. While we believe that we can operate our programs in alignment with the draft as written, our concerns over the general approach to watershed prioritization remain and we offer the following comments which we hope will be strongly considered in any future iterations of the NRS.

Concerns

- Utilizing a single metric to set watershed priorities does not accurately reflect the complex nature of work to improve water quality. Other prioritization processes, such as that used to prioritize watersheds for the non-point source program, utilized a matrix assessing several factors to determine final priorities.
- Except for one HUC, our largest production agricultural area of the state is classified as “Tier 2” though it is routinely sited as the largest source for nutrient loading contributing to the zone of hypoxia. According to the following models and analyses: SPARROW model, Conservation Effects Assessment Project (CEAP), State Resource Assessment (SRA), and the Resource Inventory and Assessment Division (RIAD) State Assessment; the delta HUCs display some of the highest nutrient loading capacities anywhere in the state.
- We do not believe that “insufficient data to assess” should automatically translate to 8-digit HUCs being less of a priority/focus within the strategy.
- The focus of the NRS update seems to only be on the ability to show success on a watershed scale as determined by the presence of initial baseline data and not fully considering the true intent of reducing the gulf hypoxic zone. The current trends analysis still largely neglects the HUCs that have the highest load potential and puts higher



priority to HUCs that may only mildly contribute to the zone of hypoxia in comparison to Arkansas delta HUCs.

- Impaired streams are present throughout the delta HUCs. Many of these streams are documented with high turbidity and sediment load levels therefore in non-attainment. The potential for excess nutrient loading within many of these HUCs is extremely high not given any consideration since the sole basis for the priority tier assignments is the trends analysis.
- Through MRBI, projects in the delta region of Arkansas have resulted in eight stream segments being delisted since 2010. This proves that success can be measured using metrics other than copious amounts of baseline data.

Recommendations

- Future updates to the NRS should use a collaborative process to identify additional prioritization criteria to be used as part of a matrix approach to determine final watershed prioritizations.

Again, we greatly value our partnership and appreciate the opportunity to provide input into the NRS. If you have any questions or would like to discuss further, please let me know.

Sincerely,

Michael E. Sullivan

Michael E. Sullivan
State Conservationist

CC:

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