

Arkansas Association of Conservation Districts
4004 McCain Blvd., Ste. 201-B, North Little Rock, AR 72116 **Phone (501) 904-5575

July 30, 2022

Director Chris Colclasure ADA-Natural Resources Division 10421 W. Markham St. Little Rock,
AR 72205

Dear Director,

The Arkansas Association of Conservation Districts appreciates the opportunity to provide comments on the draft Arkansas' Nutrient Reduction Strategy (NRS). While we understand the need for an effective NRS to address the Gulf of Hypoxia we have concerns with the process and approach taken in identifying the watershed priorities. It is vital that watershed priority areas be developed using more than one metric given the variables. Currently we do not feel that there is sufficient data being utilized given the size of an 8 digit HUC to establish watershed priorities.

Additionally, we feel that all local, state, and federal dollars need to be considered such as the Mississippi River Basin Initiative to provide our landowners and producers with opportunities. We understand the need to fulfill your obligations to E.P.A and demonstrate success. However, we do not feel the primary obligation to be showing short term successes at the expense of landowners and producers outside of your priority areas.

MRBI has been shown to have significant positive impact on delisting streams and we wish to continue those successes. We feel strongly that NRS should be developed cooperatively and with input from numerous stakeholder groups. That will ensure that we can leverage all resources toward achieving your goals as well as the meeting the needs of our conservation programs.

Respectfully,
Debbie Moreland
Debbie Moreland, Program Administrator
CC: AACD Executive Board