



April 7, 2023

Mr. Terry Cosby, Chief
Natural Resources Conservation Service
Washington, DC 20250

Dear Chief Cosby,

Re: GWPC and ASDWA Comments on the USDA NRCS Mississippi River Basin Healthy Watersheds Initiative (MRBI) and the National Water Quality Initiative (NWQI). [Docket ID: NRCS-2023-0004-0001](#)

The Ground Water Protection Council (GWPC) and the Association of State Drinking Water Administrators (ASDWA) are providing these comments on the USDA Natural Resources Conservation Service (NRCS) "Request for Information: Mississippi River Basin Healthy Watersheds Initiative (MRBI) and the National Water Quality Initiative (NWQI)." GWPC and ASDWA are the professional associations that represent the collective interests of the nation's state drinking water and ground water programs responsible for implementation of Federal Safe Drinking Water Act regulations and voluntary source water and wellhead protection programs and protection actions.

GWPC and ASDWA appreciate our long and collaborative relationship with the NRCS staff, Regional and State Conservationists, and with other [Source Water Collaborative](#) members, that converge on a shared mission to protect water quality and the soil health that contributes to it. While these comments primarily focus on the NWQI components that can specifically include source water protection watersheds, both the NWQI watershed plans and MRBI nutrient loss reduction strategies, along with associated conservation practices implemented by landowners, provide opportunities to expand outcomes, leverage partnerships, and help protect surface and groundwater sources of drinking water.

GWPC and ASDWA offer the following recommendations.

- *Expand the Prioritization of NWQI Source Water Protection (SWP) Watersheds:* GWPC and ASDWA recommend that NRCS include more information in the annual NWQI Bulletin about eligibility for NWQI SWP watersheds that can protect both surface water and groundwater quality. Source water protection, as a purpose for prioritizing NWQI, is underutilized and not consistently included in planning discussions for NWQI at the state level by both NRCS and state Clean Water Act (CWA) water quality programs that have traditionally worked together on NWQI watersheds that are prioritized based on water quality impairments.
- *Expand NWQI Outcomes by Increasing the Number of SWP Watersheds:* In FY 2023, only [13 states](#) had NWQI watersheds focused on source water protection. Of the 27 active projects, 37 percent were in one state (Oregon). Oregon has a well-established history of collaboration between the SWP program and the Clean Water Act (CWA) program that helped drive the selection of these NWQI SWP watersheds. NRCS indicated that water quality impairments have been removed from many water bodies in NWQI watersheds and in-stream monitoring in many NWQI watersheds has shown improvement. Working with state SWP programs to prioritize more NWQI SWP watersheds can expand NWQI outcomes to protect surface water and groundwater from further degradation in many more states.
- *Expand NWQI Participation and Outcomes:* GWPC and ASDWA recommend the following actions to expand NWQI producer participation and management practice implementation outcomes.

- *Promote Practices in Smaller Groundwater Areas within Larger Watersheds:* NRCS state offices can expand NWQI outcomes by identifying wellhead protection areas within larger watershed projects and targeting them for implementation of management practices that are specific to protecting groundwater sources of drinking water.
- *Use NRCS SWP Priority Area Maps to Assist with NWQI Implementation:* NWQI readiness and implementation projects can also help advance and address resource concerns and conservation practices in the [NRCS priority SWP areas identified for the 2018 Farm Bill](#).
- *Incentivize and Alleviate Restrictions for Producer Participation:* Higher payment rates to landowners (of up to 90%) are allowed in the NRCS priority SWP areas and can help incentivize participation for implementing management practices. However, the eligibility requirement for average gross income (less than \$900,000) excludes many producers that have high value crops from participating.
- *Promote Funding for Local Partners to Develop Plans and Allow Funding Beyond the Plans:* Promote the NWQI funding that local partners (including drinking water utilities, conservation districts, municipalities, and watershed protection groups) can use to develop water quality characterization and SWP conservation plans. Allow additional funding (that is not currently available) for these local partners to continue with implementation after the plans are complete, to assist with ongoing outreach and education that can supplement NRCS technical assistance capacity.
- *Coordinate Planning to Leverage CWA 319 Funding:* The NWQI Source Water Assessments contain much of the same information required for CWA 319 nonpoint source Watershed Based Plans. Coordination with state SWP and CWA programs to develop plans that meet requirements for both programs creates CWA 319 grant funding eligibility for projects and practices in the NWQI watershed area, that can also protect drinking water sources.
- *Increase Coordination and Planning with State SWP Programs:* GWPC and ASDWA recommend that state NRCS staff specifically invite state SWP program coordinators into the state's NWQI watershed planning process, in advance of the annual NRCS NWQI Bulletin. These coordinators can be found on the ASDWA website at www.asdwa.org/sourcewatercontacts/. These coordinators work with communities and drinking water utilities and can assist with both the readiness and planning phases of NWQI. NRCS Regional Conservationists can systematically play an important role in promoting this collaboration.
- *Add Source Water Protection Practices for Metrics to Measure NWQI Outcomes:* GWPC and ASDWA recommend that NRCS track the number of funded projects and types of practices implemented, including the acreages impacted and dollar figures allocated that aggregates this information to the HUC, watershed, county, or other applicable spatial boundary. This information, in addition to water quality improvement measurements, in NWQI SWP watersheds will better communicate measurable outcomes and highlight successes that can in turn encourage more SWP projects, stakeholder engagement, and participation.

Thank you for the opportunity to provide comments on these very important efforts. Please contact Sylvia Malm (smalm@gwpc.org) or Deirdre White (dwhite@asdwa.org) to set up a meeting to discuss the comments, and let us know if you have any questions.

Sincerely,



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