

The following Arkansas Nutrient Reduction Strategy (ANRS) Comments are submitted on the behalf of the Lake Conway/Point Remove Watershed Alliance

The stated goals of the ANRS are supported by the Lake Conway/Point Remove Watershed Alliance (LCPRWA) and we respectfully submit the following comments and recommendations for your consideration regarding the draft ANRS strategy. The ANRS prioritization of HUCs can directly impact our work towards improving the conditions of the watershed.

While we believe that we conduct our programs in alignment with the draft as written, some concerns remain, and we offer the following comments which we hope will be considered in finalizing this document. Some of the comments provided are very targeted, and others are more general in nature.

Section 2 Strategy Development

1. General: Headers on pages of this section are incorrect. Pages 12 – 18 are listed as Section 3: Water Quality.

2. Page 16: states

Those opportunities should demonstrate measurable or assumed benefits to the individual and surrounding watershed community.

Comment

I believe the sentence incorrectly uses the term “watershed community” in reference wastewater treatment processes. Wastewater treatment facilities rarely take into consideration the watershed (or in some cases multiple watersheds) they are located in. I would recommend striking the word watershed from this sentence.

Guiding Principles:

As stated in the ANRS, “Those processes must be adaptable to changing conditions and should adhere to the following set of guiding principles:

- Strengthening existing programs.
- Promoting voluntary, incentive-based, cost-effective conservation and protection measures.
- Incorporating adaptive management and flexible strategic planning.
- Leveraging available financial and technical resources.
- Pursuing market-based opportunities and solutions.”

Comment

These guiding principles if adhered to can provide a sound basis towards the reduction of nutrient input across Arkansas.

Public Participation

While we appreciate the efforts to develop a comprehensive list of government and non-government

organizations that play a role in nutrient reduction across the State, we found it to be missing the inclusion of important organizations. Specifically, the ANRS lists the Lake Conway/Point Remove watersheds: as one of its Tier 1 watersheds for maximum focus; it is included in the MRBI initiative; is listed as an impaired watershed; specifically listed in Goal 1, Objective A; was

previously listed in the 2014 ANRS as a part of the 10 priority HUC-8s; and has been the recipient of several ANRC grants for focused watershed work efforts. However, the Lake Conway/Point Remove Watershed Alliance (LCPRWA) who has been in existence since 2012 was not recognized in Table 1 List of Identified Stakeholders, nor invited to participate in the stakeholders meeting held on March 2, 2022.

While our primary concern is with the Lake Conway/Point Remove Watershed, the obvious omission of the LCPRWA brings concern that other equally important stakeholders have been left out of the process. It is recommended that staff make every effort to better identify relevant stakeholders and include them from the beginning of continued and future efforts.

Section 3 Water Quality

The current strategy to analyze trends seems to be missing something. Without reviewing the full data set utilized, there is a potential for some watersheds that may not meet the specific criteria in this document can and do contribute significant sediments and nutrients. While we agree with the tiered system of prioritization, there may be room for modification of priority.

As the ANRS states, “Uneven coverage in the state’s ambient water quality monitoring data sets was the primary challenge to a statewide HUC-8 prioritization framework.” However, having “insufficient data to assess” should not automatically lessen an 8-digit HUC importance for focus in the strategy. Perhaps additional effort could be placed on data review with input from affected watershed stakeholders for those watersheds with marginal data would help better define their trend. Also, as noted further in the document, emphasis is placed on the collection of additional data.

We agree that there is a need to prioritize 8-digit HUCs in the state, and what has been presented is a potential method for prioritization but should continue to be refined with additional data/stakeholder input.

Section 4 Measuring Environmental Impacts

There are vast amounts of data being collected across the state that could help with these types of assessments. While I know that there is difficulty in pairing data, if there were a statewide effort to develop and implement standardized protocols that would allow data from other organizations to be utilized, it could help reduce the burden of the cost of monitoring and increase the resolution of analysis.

If used in a priority ranking matrix, the listed designated use of domestic water supply should rank much higher than most of the other designated uses. Arkansas does not currently place a high enough priority on domestic drinking water sources nor provide a higher level of protection for this important use.

Nutrient Trends by Source Category

As noted by the previously identified Nutrient Surplus Area, significant amounts of Nitrogen and Phosphorous have been an issue in Northwest Arkansas for many years. It should also be noted that there has been an increase in poultry production in Northeast Arkansas. There has been a trend for the export of poultry litter to be used in agricultural areas for use as fertilizer which has been driven in part by increasing costs of commercial products. The concern is that

rather than addressing the proper management of these wastes, it becomes simpler and cheaper to export the waste from areas of production to areas of the state that have not had to deal with them. It is recommended that this process be adequately addressed by the ANRS.

Monitoring Nutrients

I agree with the statements regarding the difficulties of financial support and how much monitoring may be need for watershed specific purposes.

Establishing a statewide effort to develop and implement standardized protocols that would allow data from other organizations to be utilized could help reduce the burden of the cost of monitoring and increase the resolution of analysis

Nutrient Criteria Development

The state should continue the process towards developing numeric nutrient criteria.

Section 5 Nutrient Reduction Practices

In general, Arkansas has done a good job regulating and managing impacts from point sources. The largest impacts are from unregulated non-point sources. While difficult to manage, impacts from activities such as agricultural, forestry have been making strides towards reduction of their impacts. However, it would be advantageous to improve the communication of these through documented efforts that are based on sound science.

Section 7 Strategic Framework

As stated, "The three main goals of ANRS are:

1. Increase or maintain downward nutrient trends in Tier I watersheds.
2. Enhance water quality monitoring and increase or maintain downward nutrient trends in Tier 2 watersheds.
3. Continue efforts to reduce nutrients in all watersheds."

These are all commendable goals that absolutely should be the focus of the strategy.

Section 8 Measuring Progress

Adaptive Management should be fully integrated into the process, and it is recommended that the ANRS strategy be reviewed on an annual basis with a full update on a five-year cycle to keep the strategy relevant.

Thank you for the opportunity to comment on the 2022 draft Arkansas Nutrient Reduction Strategy (ANRS) outlining future efforts to reduce nutrients entering waterways from Arkansas that continue to enlarge the hypoxic zone in the Gulf of Mexico.