

These comments are submitted on behalf of the Natural Resources Conservation Service-Arkansas:

- 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.
- With the exception of one HUC, Arkansas's largest production agricultural area 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.
- "Insufficient data to assess" should not automatically translate into an 8-digit HUC 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 the Mississippi River Basin Health Watersheds Initiative (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.
- It is strongly recommended that future updates to the NRS use a collaborative process to identify additional prioritization criteria to be used as part of a matrix approach to determine final watershed prioritizations.