



April 7, 2023

The Honorable Robert Bonnie
Under Secretary for Natural Resources and Environment
USDA Natural Resources Conservation Service
1400 Independence Ave SW
Washington, D.C. 20250

Dear Mr. Bonnie:

The Upper Mississippi River Basin Association (UMRBA) works on behalf of Illinois, Iowa, Minnesota, Missouri, and Wisconsin to facilitate and foster interstate water resource planning and cooperative management in the Upper Mississippi River basin. UMRBA serves as the interstate water quality entity. On behalf of the UMRBA Water Quality Executive Committee, I am pleased to provide comments about the implementation of the Mississippi River Basin Healthy Watersheds Initiative (MRBI) and the National Water Quality Initiative (NWQI). Both MRBI and NWQI are vitally important programs that address water quality and natural resource concerns in the Upper Mississippi River basin. UMRBA appreciates that the Natural Resource Conservation Service (NRCS) is working to increase efficiencies in the programs and expand access to underserved communities and producers.

The following comments are organized below by questions NRCS provided on the Federal Register.

1) *How should NRCS improve the effectiveness of MRBI and NWQI when addressing water quality concerns?*

- Streamline financial assistance processes to remove barriers for landowners to implement conservation practices. For example, if conservation practices are identified as part of a watershed plan for MRBI and NWQI to address the resource concerns, then planning steps to implement those practices can be reduced.
- Structure incentives to factor in the benefits to both the watershed(s) and the landowner(s). An example is a practice that reduces income from less crop production or leads to less opportunity costs has a higher incentive compared to a practice that provides economic benefits to the applicant. Another example is to increase the cost share match for more costly structural practices that may have larger impacts on water quality.
- Increase opportunities for non-NRCS partners to engage and provide technical assistance in MRBI and NWQI projects. This can reduce personnel requirements of NRCS staff to implement the program(s).
- Understand i) factors that lead to successful implementation MRBI and NWQI (quantity of projects and delisting impaired waterbodies) and where there is opportunity for increasing

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more projects and ii) barriers to MRBI and NWQI applications — e.g., staffing needs, connections with states, and participation in MRBI and NWQI.

2) *To effectively deliver water quality improvement and protection, MRBI and NWQI require watershed assessments to guide conservation assistance. How should NRCS improve the watershed assessment process to target delivery of conservation assistance achieved through MRBI and NWQI?*

- Continue to provide support for the planning phases to ensure implementation plans address resource concerns and prioritize locations for practices to help minimize these concerns. Ensure flexibility to project sponsors for watershed plans accepted by NRCS. The Agriculture Conservation Planning Framework and similar tools are good options to provide high level assessments and to prioritize practices based on these assessment-based conditions within a given watershed. However, on the ground practitioners are still vital to ensure practices meet requirements for implementation.
- Utilize ArcGIS online mapping tools to support the annual project submittal process and outreach activities throughout the various phases of MRBI and NWQI. Suggested ArcGIS layers include state nutrient reduction strategy priority watersheds (applicable to the 12 Hypoxia Task Force states), MRBI and NWQI watersheds, Section 319 watersheds, and waterbodies on the Section 303(d) and 305(b) lists.
- Utilize existing plans and programming at the state and local level to propose MRBI and NWQI watersheds to help increase implementation successes. In the State of Wisconsin, examples include nine key element plans, producer-led watershed groups, and demonstration farm networks.
- Align NWQI watershed assessments with USEPA's nine elements for watershed-based plans. This could allow for a single assessment or plan to make a watershed eligible for multiple federal funding sources.
- Provide resources for new NRCS staff and partners to understand the process of submitting watersheds for consideration for MRBI and NWQI – e.g., training materials.
- Streamline training opportunities for state level NRCS staff to provide technical assistance in the planning phases of MRBI and NWQI. Potential tools include Agriculture Conservation Planning Framework and Operational Tillage Information System.

3) *How can NRCS ensure that MRBI and NWQI provide the benefits of water quality conservation to disadvantaged communities and underserved producers?*

- Utilize existing assessment tools to identify disadvantaged communities and USDA resources for identifying underserved producers — e.g., EJ Screen. The identified communities can be overlain on ArcGIS with locations eligible for MRBI and NWQI projects.
- Provide outreach to disadvantaged communities and underserved producers on the opportunities and process for developing projects under MRBI and NWQI.
- Streamline the enrollment process and increase financial assistance for disadvantaged communities and underserved producers.

4) Under the Clean Water Act, water quality impairments have been removed from many water bodies in MRBI and NWQI watersheds, and in-stream monitoring in many NWQI watersheds has shown improvements related to agricultural conservation. How should NRCS improve and potentially expand the metrics for the measurement of outcomes targeted and achieved through MRBI and NWQI?

- Layer in metrics for climate resilience — e.g., greenhouse gas reduction and carbon sequestration.
- Provide annual and final updates to MRBI and NWQI sponsors of the implementation status of the project(s) and other USDA program financial assistance in the project area.

Thank you for the opportunity to provide comments. Please contact me at 651-224-2880 or kwallace@umrba.org if you have questions or would like to discuss UMRBA's comments in further detail.

Sincerely,

A handwritten signature in blue ink that reads "Kirsten Wallace". The signature is written in a cursive style and is positioned to the left of a vertical line.

Kirsten Wallace
Executive Director
Upper Mississippi River Basin Association

cc: Martin Lownefish, NRCS Areawide Planning Branch Chief
UMRBA Water Quality Executive Committee