June 15, 2020

Re: NRCS National Bulletin 300-20-37 LTP – Refining Source Water Protection Local Priorities for Fiscal Year (FY) 2021

Dear AWWA Member:

On June 1, the Natural Resources Conservation Service (NRCS) headquarters requested that each NRCS state office designate high priority source water protection areas in which it anticipates targeting future deployment of conservation dollars (Bulletin NB 300-20-37). This represents a substantial opportunity to help NRCS set a productive course forward for source water protection. To assure that this opportunity results in the most efficient deployment of resources, utilities should request to be part of the planning process and contribute their knowledge of source water protection.

In order to be prepared for the subsequent rounds of funding, NRCS state offices will need to identify priority watersheds to NRCS headquarters by September 30, 2020.

What the bulletin encourages state NRCS offices to do.
1. Ensure adequate focus is placed on source water protection. During the spring and summer of 2019, each NRCS state office developed “local source water protection priority areas” in response to the 2018 Farm Bill’s requirement to prioritize source water protection.

As with any initial effort, these first attempts led to a wide range of outcomes. The current bulletin will set the stage for all NRCS offices to revisit their prior approach and:

- Prepare a publicly available reference set of state priority source water areas; and
- Apply a methodology that focuses resources on a specific group of watersheds where source water protection objectives are the focus of NRCS efforts and increased payment rates.

2. Assure collaborative planning and stakeholder involvement in watershed prioritization. With the initial round of analysis completed in 2019, the new bulletin emphasizes the need for further prioritization of target watersheds and the need to engage water suppliers in the state. There are models of strong collaboration with water suppliers from last year’s efforts that AWWA can provided to interested members.

3. Describe key elements of a source water prioritization process. The bulletin outlines the essential elements of the process NRCS offices will use to identify source water priority areas. It provides a consistent approach and offers a clear role for water suppliers to serve as key partners to NRCS. The elements are:
1. Gather input on which watersheds should be considered the highest priorities from knowledgeable stakeholders.

2. Identify watersheds where intervention can be focused and evaluated.
   a. The bulletin requires that no more than 20% of the landmass of a state be prioritized for source water protection.
   b. Build off 2019 efforts (e.g., identified 2019 local priority areas and stakeholder engagement efforts).

3. Utilize shared reference materials to locate and communicate effectively about high priority watersheds.
   a. EPA’s Drinking Water Mapping Application to Protect Source Waters (DWMAPS) tool is specifically cited.
   b. Communicate the target watersheds to USDA Headquarters and stakeholders at an appropriate scale, the Hydrologic Unit Code level 12 (HUC-12).

4. Adjust processes and procedures for long-term incorporation of source water protection priority setting.
   a. Allow for modification (both adding and removing) of the existing local priority areas in addition to the new designation of high priority areas.

**NRCS needs the engagement of the water supply community in the next three months**

NRCS Headquarters is sending a clear signal to its offices that effective prioritization of watersheds for source water protection is a key action item from the 2018 Farm Bill. No other group of stakeholders has the knowledge needed to help NRCS State Conservationists with the tasks outlined in this bulletin. State Conservationists have roughly three months to conduct prioritizations that will direct funding for the coming fiscal cycle. Water suppliers in each state should:

1. Reach out to the NRCS State Conservationist, who can refer you to the appropriate NRCS staff member working on developing recommendations.

2. Be prepared to discuss your source water areas and needs, and to the extent you are aware of them, priorities elsewhere in the state (and contacts to get more information). Be prepared to provide this information at the HUC-12 level.

3. If available, be prepared to share any source water assessments or management plans to help justify inclusion in high priority areas.

Those reaching out to NRCS should consider inquiring about other opportunities to engage, such as the National Water Quality Initiative (NWQI), joining the state technical committee, or other ways to partner for source water protection. Also consider contacting your state’s primacy agency source water protection coordinator to coordinate input.

**How can we help?**

Reviewing Working with the NRCS for Source Water Protection and other resources on the AWWA Source Water Protection Page can help you prepare to engage with NRCS. AWWA continues to seek out ways to assist members with achieving their source water goals as they relate to agricultural concerns. Any questions or feedback are welcome – please contact Adam Carpenter (acarpenter@awwa.org) or Tracy Mehan (tmehan@awwa.org) in the AWWA Washington, DC Office.