



February 25, 2019

Comment Clerk

Docket ID: USDA-2019-0001

U.S. Department of Agriculture

Office of the Secretary

1300 Independence Ave, S.W.

Washington, DC 20250

**Re: ASDWA and GWPC Comments on 2018 Farm Bill Implementation (USDA-2019-0001)
Federal Register Notice 2/14/19, 84 FR 4041, 2018 Farm Bill Implementation Listening Session**

The Ground Water Protection Council (GWPC) and the Association of State Drinking Water Administrators (ASDWA) appreciate the opportunity to submit the following comments for the U.S. Department of Agriculture's Farm Bill Implementation Docket ID: USDA-2019-0001. 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 actions. Our comments address implementation of Farm Bill Section 2503(d), Source Water Protection Through Targeting of Agricultural Practices.

Our two organizations also serve as the co-chairs for the national Source Water Collaborative (sourcewatercollaborative.org). The Source Water Collaborative represents 27 national organizations who work together to identify and promote successful implementation of opportunities to protect both groundwater and surface water sources of drinking water. Additional members of the Source Water Collaborative include Natural Resources Conservation Service (NRCS), Farm Service Agency (FSA), the Environmental Protection Agency (EPA), the National Association of Conservation Districts (NACD), the American Water Works Association (AWWA), and the National Rural Water Association (NRWA). However, these comments represent the collective membership of GWPC and ASDWA and are not intended to represent the views of the full Source Water Collaborative or its other members.

Common Ground Between State Source Water Programs and State Conservationists

State drinking water and source water protection programs have considerable common ground with NRCS and FSA conservation programs. The Source Water Collaborative developed a collaboration toolkit with NRCS on "Protecting Drinking Water Sources Through Agricultural Conservation Practices," that can be found at <https://sourcewatercollaborative.org/swp-usda/>. The toolkit highlights that both programs:

- Have a voluntary, non-regulatory approach to working with producers and private landowners.
- Focus on protecting and improving soil and water quality.
- Can achieve and demonstrate water quality results in priority areas.
- Help protect the health of people and livestock by protecting drinking water sources.

Important Progress to Date and Multiple Opportunities for the 2018 Farm Bill

Implementing the 2018 Farm Bill Section 2503 source water protection provisions, "Source Water Protection Through Targeting of Agricultural Practices," will help build on recent successes. There are already many examples of successful partnerships between state source water coordinators, community water systems, and NRCS State Conservationists through the National Water Quality Initiative (NWQI)

and its new Source Water Protection Pilot, the Regional Conservation Partnership Program (RCPP), the Conservation Innovation Grants (CIG), and through many other key conservation programs like the Environmental Quality Incentives Program (EQIP).

Two examples of successful partnerships at the local or regional scale include:

- In response to the request for NWQI Source Water Protection Pilots in 2018, the Oregon State Conservationist reached out to the state source water coordinator. As a result, five source water protection pilots were proposed and approved in Oregon for 2019 (of the 16 pilots approved nationally).
- New Hampshire and Maine State Conservationists partnered with the state drinking water programs in the Salmon Falls River Watershed and have now invested over one million dollars in EQIP conservation practices that were implemented on 6000 acres.

These examples are just a small demonstration of the many collaboration efforts that are already taking place across the country. There are many more current RCPP and other NRCS conservation program projects that may not have specifically highlighted protection of drinking water sources in their project goals, but in many cases are also providing source water protection benefits.

State Source Water Protection Programs Can Provide Essential Information and Resources

State source water protection programs have maps of the source water protection areas for both groundwater and surface water sources of drinking water for each community water system (CWS) in every state and territory. They can also identify priority areas that would most greatly benefit from implementing agricultural conservation practices to protect those drinking water sources. In addition, both the state source water coordinators (asdwa.org/sourcewatercontacts) and community water systems can potentially leverage additional funding, provide matching funds for cost share assistance to producers, and bring other partners to the table - both formally as in RCPP projects and CIG, and less formally through specific conservation programs like EQIP, the Conservation Stewardship Program, the Wetlands Reserve Program, and others. State drinking water programs were charged with identifying current and potential sources of drinking water and assessing the potential threat of contaminants to those sources as part of the 1996 Safe Drinking Water Act (SDWA) Amendments, and many states continue to update this information. State source water protection programs can assist with implementing agricultural practices to protect drinking water sources in the following ways:

- Connecting State Conservationists with community water systems.
- Sharing data and GIS layers identifying source water protection areas and priority contamination concerns. Note: Sharing state GIS layers may require an MOU.
- Providing technical assistance and funding to assist landowners with implementation of conservation practices.
- Engaging other partners such as: state clean water programs, state and Federal land management agencies, state geologists, local planning districts and councils of government, state rural water associations, schools, universities, and others.

Recommendations

1. GWPC and ASDWA would like to see source water protection success stories through the implementation of conservation practices in every state as a result of Farm Bill Section 2503(d) requiring the “Secretary to use not less than ten percent of conservation program funds to implement the provision on Source Water Protection through Targeting of Agricultural Practices.” Both organizations are continuing our efforts to encourage state source water coordinators to reach out to the State Conservationists, participate in State Technical Committees, and share source water information and priorities with NRCS state offices. Our organizations will also continue to promote use of the Source Water Collaborative Toolkit at <https://sourcewatercollaborative.org/swp->

conservation-partners-toolkit/, developed with NRCS and NACD, for state and local source water partners to learn about and develop effective working relationships with state NRCS offices, and conservation districts.

2. GWPC and ASDWA recommend that every State Conservationist be engaged in implementing the Section 2503(d) source water protection provisions, and that the full range of allowable conservation programs be used in accounting for the ten percent requirement, as well as special initiatives such as the NWQI Source Water Protection Pilot and RCPP. Our organizations also recommend that NRCS consider the systematic inclusion of source water protection criteria and ranking points to aid in directing conservation funding to source water protection in each state, and that projects addressing source water protection be clearly identified as such and tracked so that successful approaches and partnerships can be shared and replicated.

In closing, GWPC and ASDWA would both like provide input as NRCS develops its approach for implementing the Section 2503 source water protection provisions. We also plan to continue to provide information and assistance through our networks and the Source Water Collaborative; and to build and strengthen partnerships between state source water coordinators, community water systems, NRCS State Conservationists, and the broader stakeholder community on these very important efforts to protect drinking water sources.

Thank you for the opportunity to provide comments. USDA’s attention to these very important efforts as part of the implementation of the 2018 Farm Bill is essential and greatly appreciated by both organizations and the drinking water community. Please feel free to contact Sylvia Malm of GWPC (703-532-6181 or smalm@gwpc.org) or Deirdre Mason of ASDWA (703-812-4775 or dmason@asdwa.org) if you have questions or would like to discuss these comments in more detail.

Sincerely,



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