# Numeric Nutrient Framework Memo

## Key Takeaways

- On April 5, 2022, the EPA released their Nutrient Framework Memo which expresses the agencies continued commitment to supporting states and industry partner's work in achieving nutrient pollution reductions from all sources.
- One concerning aspect of the memo is the agency's intention to utilize its Clean Water Act authorities to advance its goals by strongly encouraging states to adopt robust numeric nutrient criteria into the Water Quality Standards.
- The Tennessee Department of Environment and Conservation released a strategy in 2015 for reducing nitrogen and phosphorus into streams and lakes.
- TFBF provided a policy development backgrounder in 2021. It can be accessed by using the QR code at the end of this paper.

## Questions

1. Do you believe farmers are aware of the nationwide focus on reducing nutrients?
2. Do farmers in your area use best management practices (BMPs) to reduce nutrient runoff?
3. What steps should the agricultural community take to collect field level data on nutrient runoff?
4. How could the state fund a program to determine nutrient baseline data in agriculture?

## Background

**On April 5, 2022, the EPA released its Nutrient Framework Memo which expresses the agencies continued commitment to supporting states and industry partner's work in achieving nutrient pollution reductions from all sources.** The memo emphasizes the importance of working with the agriculture sector and strives to initiate new opportunities, while also deepening many of the existing collaborative partnerships. It allows for states, tribes, and territories to continue to lead nutrient reduction efforts and encourages them to adopt a One Water, holistic approach. The agency will support states by providing helpful tools, technical assistance, and collaborative relationships with USDA and other federal entities. Additionally, it would challenge states and industry partners to spur development of more effective technologies and create more innovative, market-based financing options for water quality improvements—such as water quality trading or banking.

**One concerning aspect of the memo is the agency's intention to utilize its Clean Water Act authorities to advance its goals by strongly encouraging states to adopt robust numeric nutrient criteria into the Water Quality Standards. The agency**

One concerning aspect of the memo is the agency's intention to utilize its Clean Water Act authorities to advance its goals by strongly encouraging states to adopt robust numeric nutrient criteria into the Water Quality Standards.

available to reduce nutrient run-off. We oppose numeric nutrient standards in Tennessee's water quality criteria. We oppose agricultural nutrients being considered point sources of pollution. We believe the University of Tennessee, Tennessee Department of Agriculture, USDA NRCS and other stakeholders should work to establish recent and reliable data concerning nutrient run-off and realistic effects on water quality.