

Collins, Kelly A.

From: Greg Carter <wgcarter@aep.com>
Sent: Thursday, October 09, 2014 12:17 PM
To: Arkansas Water
Cc: 'Edward Swaim (Edward.Swaim@arkansas.gov)'; ken.brazil@arkansas.gov
Subject: ANRC Water Plan Comments

Please find below several comments regarding the Executive Summary dated June 30, 2014.

Page 54 and 55 – Section 6.1.2 Surface Water Availability

Surface water modeling should be run under dry conditions, similar to the MERAS model for groundwater, to provide a more accurate estimation of the available water supply during drought when the system is stressed the most. I recommend using a 10 percentile year based on available USGS gauge data. I do realize that the surface water rules are based on ANRC Title 3 methodology. I also understand that the methodology has historically been effective in dividing up the available surface water and in determining the amount of available surface water. My concern is that with the desire to move irrigated agriculture from groundwater to surface water, the surface water system will become more highly stressed due to higher future demands, and water users who start depending on surface water may find that it is short when they need it the most.

Page 67 Figure 6.7 2050 Groundwater Gap

This figure is probably the most important fact of the entire Executive Summary. If you needed a one page summary of the report, it would be this figure.

Page 68 Section 6.2.2 Surface Water Availability

The first sentence incorrectly lists the three basins in the North Arkansas WRPR. The Arkansas River Lower should be the White River Upper.

Table 6.10 – as I understand it, the Excess Surface Water column and the Total Available Surface Water column are based on the respective numbers for the entire basin, whether it is from the North Arkansas WRPR or from another planning group. It would be more meaningful to list the available water for each specific region rather than for the basin as a whole. I understand that it may not be a totally exact split, but the manner in which it is listed currently implies an overabundance of surface water that the casual reader of the plan might not catch. This same comment applies to each region, as I see it in Table 6-14 page 70 for the North Arkansas WRPR. If possible it would be beneficial to break out the water supply on a per county basis. While I realize that such a division would be an estimate, it would make the plan more user friendly to future users. Such a division may already be included in an appendix, which would be adequately address my comments. Another option would be to have the information included in a specific plan for each region, as the ANRC did in the 1990 regional plans.

Page 77 Section 6.2.5 Surface Water Availability

Most of this paragraph appears to have been copied from Section 6.2.4. The name of the region was changed, but the river basins and the specified water volumes need to be corrected.

Page 79 Supply and Infrastructure Gaps

The text refers to Figure 6-19 which does not exist. I think it should be Figure 6-17.

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