

Collins, Kelly A.

From: Jack Stewart <jampack1@mac.com>
Sent: Wednesday, September 17, 2014 9:16 AM
To: Arkansas Water
Subject: draft Arkansas Water Plan

Dear Sir:

Your proposed Arkansas Water Plan Update will set water management policy for years to come, and I have the following comment on this update.

Because the analysis of available groundwater indicates that it will be inadequate to meet the demands in the delta and it appears that future solutions will likely include use of surface water above the excess level. Excess surface water is currently defined as 25 percent of the water in streams after several defined needs have been met, including instream flow needs. The calculation of these defined needs relies on the Arkansas Method to determine the instream flow portion.

It is very important to use the best possible measurements of instream flow needs. It is further clear that increasing demands will be made on our surface water for out-of-stream uses. As a result of this increasing demands on our surface water for out-of-stream uses we must be sure that our calculations of instream flow needs are based on the best available science and techniques.

It is not clear if the Water Plan takes makes use of the best available science in these calculations and Section 3.3 proposes removal of the 25% rule that governs the use of excess water in the state before a sound scientific process has determined the amount of excess water in the stream or river.

Thank you for taking my comments . Please keep me informed as this Water Plan moves toward finalization.

Jack Stewart