

**Collins, Kelly A.**

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**From:** sam cooke <sdcooke22@gmail.com>  
**Sent:** Friday, October 24, 2014 12:39 AM  
**To:** Arkansas Water  
**Subject:** Arkansas Water Plan Executive Summary

Dear Ms Collins,

I want to thank the Arkansas Natural Resources Commission for providing this opportunity to comment and for the commitment to stakeholder involvement. Engagement of the public will add transparency to the AWP and engender public trust. It is my hope that the ANRC will continue such commitment into the implementation of the plan in determining regional water needs.

In section 2.3 Water Quality, one of the key findings, in reference to 41% of the state's streams not meeting designated use, states there is no pattern of impairment or cause of impairment. Table 6.4 is given as a reference as well as the ADEQ 303d list of impaired waters. It is impossible to draw a conclusion as to cause of impairment from the table. However, an ADEQ supplied map of impaired streams in the state shows a majority of the impaired streams in areas of the greatest concentration of irrigated farmland. The ADEQ 2012 305b Report states that 43.1% of the impaired stream miles have been assigned agriculture as the cause of impairment. Of the known sources of impairment, this is the largest source. Previous assessments by ADEQ have pinpointed agriculture as the largest contributor to nonpoint source pollution statewide. This includes all types of agriculture practices. The same report addresses primary sources of groundwater contamination. It mentions agriculture as one of the two largest contributors to groundwater contamination. The fact that 41% of streams and 36% of lake fail to meet designated use is a general pattern of impairment. As to pattern of cause, agriculture leads the list of causes.

Water conservation should be the principal component of allocation of water resources. Not only would this reduce the need for interbasin transfer of water and all the associated costs, but it would reduce pollution of surface water and groundwater. Ideally, the burden of pollution costs should be shifted to the source of the pollution. Infrastructure use in the form of consumer fees should be associated with any large scale water transfer projects to help offset the taxpayers costs.

In section 3.3, it is important that the currently adopted and statutorily defined twenty-five percent limitation on the transfer of excess water be allowed to remain in place until further science based studies are completed prior to implementation of a stakeholder involved risk based system established for determining in-stream flow needs.

Thank you for your consideration.

Sam Cooke