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#### Questions Comments:

Thank you for this opportunity to provide comments for the stakeholder panels consideration. Mine are brief: 1. Section 6 of the 2016 Assessment Methodology (AM) describes the protocol for rounding up to the nearest 10 the number of actual samples used to calculate the number of exceeding the standard for determining non-support. This practice of always rounding up creates a higher threshold of exceedances than is actually described in the AM. For example, using the example set forth in the AM, rounding the 18 samples up to 20, then applying the 10% exceedance criteria, results in a threshold of 3 exceeding samples required for a non-support determination.  $3/18 = 16.6\%$  exceedance rate, not the 10% set forth in the AM. The bias will be greater the further the actual number of samples are from the round up value. ADEQ should re-visit this practice to affirm whether or not an inappropriate amount of bias is introduced by this practice. 2. Section 6.9 Nutrients establishes a high threshold for non-support, particularly considering nutrient enrichment is considered one of the leading causes of water quality degradation in Arkansas and Arkansas lacks numeric criteria for nutrients statewide. ADEQ and the stakeholder panel should review and affirm whether the AM's requirement that all three conditions of evaluation (i.e. N and P concentrations compared to ecoregion conditions, water quality translators, biological assemblage assessments) must be met for a non-support designation. 3. Section 6.12 Ammonia uses chronic concentration criteria based on the presence or absence of early life stages of fish based on a critical season of April 1 through October 31. ADEQ and the stakeholder panel should review these chronic criteria in light that the salmonid *Salmo trutta* (brown trout) is a fall spawner and critical life stages occur through the winter. Again- thank you for this opportunity to comment on this important component of Arkansas' water quality protection. Mike Armstrong