

Dear Katie Mann and Nate Wentz,

I would like to submit this for public comment in regards to Arkansas Nutrient Reduction Strategy for HUC 8

Sediment loads, bank erosion and downcut channels;

Over the many years since the Clean Water Act we have taken great steps with our NPEDS permits. The ag community has begun work with their nutrient management plans and in the years to come this will have a positive effect on our rivers.

These steps benefit our rivers while our rivers are at base flow and seasonal flow. As most of us know the greatest damage to our rivers and lakes occurs during heavy rains and floods. More work is needed here. We know this and a general knowledge of this but little work progress has been made.

In urban and suburban areas few communities are making an effort to address stormwater run-off.

Communities claim these codes would harm businesses and drive up their costs. Nothing is more costly than lawsuits. With new business trends being "Go big or go home" we see more small towns with large chain stores moving in. In communities that have stormwater codes these businesses comply with codes. However that chain business has no regard for our rivers in communities that have no codes. This is lying and cheating the people that support them. If stormwater protection is the right to do in Washington County then it is the right thing to do in Carroll County also.

The greatest problem with our rivers and lakes is the river channels.

Our rivers and the creeks that feed them are extremely eroded. The channels that should be class "C" channels are mostly class "F" channels. These flat channels cause the banks to erode. The soils from eroded banks release soluble nutrients that are carried to our lakes. We work hard with our NPEDS permits and nutrient management programs; yet we neglect the fact that every year hundreds of thousands of tons of nutrient rich soils from the Kings River watershed are washed into Table Rock Lake each year.

There are numerous cut banks. Sometimes at every bend, one after the other. Property owners face large expenses and lengthy and difficult permits to repair their properties. Too many times repairing one site causes another site to erode so that there is little net gain. We need a whole river approach to start addressing problems. One site at a time seems not to be working as well as it needs to.

Respectfully,

Ray Warren,

Kings River Watershed Partnership.