

From: Angela N. Danovi [mailto:adanovi@ozarkswaterwatch.org]
Sent: Wednesday, May 08, 2013 4:01 PM
To: Szenher, Doug; Reg-Comment
Subject: Reg 2 Comment - Support Regulation 2.509 (Nutrients), Section B (Site Specific Nutrient Standards for Beaver Lake)

Dear ADEQ,

Ozarks Water Watch is a 501 (c) 3 not for profit organization to fulfill the mission of promoting water quality in the upper White River Basin of Arkansas and Missouri, its four major lakes – Beaver, Table Rock, Taneycomo, and Bull Shoals, and the many streams and rivers which flow into them. We work with local individuals and watershed groups in the Upper White River Watershed. As such, we have a vested interest the Regulation 2 proposal currently under review for the state of Arkansas.

I am writing in support of Regulation 2.509 (Nutrients), Section B (Site Specific Nutrient Standards for Beaver Lake). The proposed standard establishes growing season geometric mean (May - October) of 8 ug/L of Chlorophyll (a) and an annual average Secchi transparency of 1.1m at the Hickory Creek site over the old thalweg, below the confluence of War Eagle Creek and the White River in Beaver Lake.

Ozarks Water Watch considers the proposed criteria appropriate for nutrient standards in Beaver Lake. The criteria were established as the result of a technical workgroup developed to set scientifically based nutrient standards for lakes as required by EPA. A weight of evidence approach to developing the standards was used and all of the work was done with scientific rigor. Evidence considered to develop the criteria included the following:

- Surrounding state numeric criteria for chlorophyll, Secchi, total phosphorus, and total nitrogen,
- Ecoregion values,
- Percentile values based on both reference lakes and extant values for Beaver Lake,
- Statistical analysis of Beaver Lake and Reference Lake data,
- Empirical nutrient loading relationships, and
- Dynamic modeling results.

A focus was placed on Chlorophyll (a) and Secchi depth because those parameters represented the response of the lake to nutrient loading. The chlorophyll (a) standard is based on the geometric mean of measurements taken over the thalweg of the lake at Hickory creek during the growing season (April through October). By utilizing the geometric mean, the impact of extreme events will be minimized meaning that a single bad value will not result in the lake failing to meet the standard.

We believe this site specific criteria provides much needed protection to Beaver Lake. Beaver Lake is currently meeting or exceeding the proposed site specific nutrient criteria. This site specific criteria will establish a minimum standard, beyond which we do not want Beaver Lake to degrade.

For the protection of Beaver Lake and the people who use Beaver Lake now and in the future for recreation, drinking water, fishing, and many other uses, we strongly support retaining the site specific nutrient criteria for Beaver Lake in the final language of Regulation 2.

Thank you for your time. If you have any questions, please contact me at 479-295-7717 or through email at adanovi@ozarkswaterwatch.org

Sincerely,

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