Amended version

I urge the Department to ensure that the draft revised Assessment Methodology (AM) and any and all subsequent reports/recommendations are in accordance with all relevant and applicable parts of 40 CFR 122, 40 CFR 130, and 40 CFR 131.

Currently, Arkansas has no numeric nutrient criteria. This inadequate approach fails to protect Arkansas waters from loss of designated uses to nutrient pollution, especially with respect to nitrogen (N) and phosphorus (P).

Additionally, I urge the Department to revise the Arkansas Phosphorus Index (API) and adopt a more quantitative method, one which includes the physical, geological and hydrological conditions and characteristics of the Watershed.

Thank you for your consideration.

Respectfully,
Dane Schumacher