

Archived: Friday, October 2, 2020 2:55:16 PM
From: [Sam Cooke](#)
Sent: Friday, October 2, 2020 2:35:50 PM
To: [CPP-antideg-comments](#)
Subject: [BULK] Comment
Importance: Normal
Attachments:
[FOR Comment AIM.docx](#) ;

Please see the attached file.

Jacob Harper
Arkansas Department of Energy and Environment
5301 Northshore Drive
North Little Rock, AR 72118

Friends of the North Fork and White Rivers Comments on the Arkansas Draft Antidegradation Implementation Methods 2020 Edition:

Friends of the North Fork and White Rivers, a nonprofit watershed organization, finds that the definition of waters of the State is being ignored by the stated purposes of the Antidegradation Implementation Methods. Arkansas's definition of waters of the State is an exercise of sovereignty consistent with cooperative federalism. Federal regulations encourage states to adopt more expansive definitions of waters by not limiting the states obligations to protect only those waters defined as waters of the U.S.

We agree with the EPA, the Arkansas Natural Resources Division of the Arkansas Department of Agriculture and the Arkansas Game and Fish Commission that, as the draft is written, many waters of the state, including reservoirs, karst ephemeral streams and wetlands, that may be critical to maintaining the physical, chemical and biological integrity of water quality throughout the state would be excluded from protection. We strongly oppose the narrowing of the scope of applicable waters by tying antidegradation policy to the federal definition of waters of the U.S.

We appreciate the opportunity to comment on the draft proposal.

Sam Cooke
Vice President, Friends of the North Fork and White Rivers