

From: D. Doss [mailto:ddoss@conwaycorp.net]
Sent: Monday, December 02, 2013 12:03 PM
To: Szenher, Doug
Subject: War Eagle creek rulemaking

Hello Mr Szenher,

I am resubmitting my comments now that the rule making has been issued. Our concerns about this have not changed since July of this year. See our comments below.

Thanks, Debbie Doss
Conservation Chair
Arkansas Canoe Club
501-472-6873

Good morning.

I am Debbie Doss conservation chair of the Arkansas Canoe Club. I am also chair of the Arkansas Conservation Coalition and recently served in the triennial review working group for Adeq.

The Arkansas Canoe Club has over 1400 members with seven chapters in three states. The club is deeply concerned about issues that affect water quality in the state of Arkansas.

The quality of Arkansas streams is greater than that of nearly any within the United States. In 2001 a study undertaken for the Congress of the United States found that Ozark Mountain streams contain some of the very highest levels of aquatic biodiversity in the country and the most intact ecological systems of their kind on the North American continent.

We are deeply concerned about the steady degradation of our streams in the state of Arkansas. Since 2001 numerous streams sections have been added to the states 303D list of impaired water bodies. This is a very troubling trend.

Is it possible to lower water quality standards without damaging streams? Possibly but, downgrading water quality standards for these creeks should be based on good science, not a "mother may I" system of arbitrarily changing numbers because the ones in the regulation are inconvenient.

-War Eagle is a classic Ozark Stream that is used for recreation and fishing.

-The War Eagle passes through Hobbs Creek State Park, and flows into Beaver Lake.

-Ozark streams, state parks, and lakes are an important part of our tourist economy.

-Many people enjoy the water quality present in these streams to float and swim.

-Protecting such high quality waters is important to Arkansas.

-The War Eagle is also important to wildlife.

-The War Eagle is home to the potentially threatened Rabbits Foot Mussell, and has been listed as potential critical habitat for that species.

There was a time when our state understood the value of what we have and was ready to protect importance of protecting water quality in the natural state. Our standards were even better than those required of us by federal law. Both water quality and biodiversity are destined become even more important in the future.

The important characteristics of the War Eagle or any of our streams can only be maintained with high quality water standards--this rulemaking does not further that objective.