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**Arkansas Natural Heritage
Commission**

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Date: December 2, 2014

Subject: Proposed Third-Party Rulemaking
Southwestern Electric Power Company
John W. Turk, Jr. Power Plant
Docket 14-007

ANHC No.: S-ADEQ-14-243

Dear Mr. Szenher:

Staff members of the Arkansas Natural Heritage Commission have reviewed the proposal from Southwestern Electric Power Company (SWEPCO) for the following amendments to Regulation 2:

- for the Little River from Millwood Lake to the mouth of the Little River, modification of the Total Dissolved Solids (TDS) water quality criterion from 100 milligrams per liter (mg/L) to 138 mg/L and modification of the temperature criterion from 30°C (86°F) to 32°C (89.6°F);
- for the Red River from the mouth of the Little River to the Arkansas/Louisiana state line, modification of the TDS water quality criterion from 500 mg/L to 860 mg/L and removal of the designated, but not existing, domestic water supply use.

We are concerned about the implications of these changes to species of conservation concern known to occur in these streams.

Our records indicate the occurrence of five aquatic species of conservation concern in the Little River and four in the Red River within the referenced reaches (please refer to attachment A). Two species of federal concern occur in and along these streams: the endangered Ouachita rock pocketbook (*Arkansia wheeleri*) in the Little River, and the endangered interior least tern (*Sternula antillarum athalassos*) along the Red River. The proposed changes could have adverse impacts to rare species. Higher levels of TDS could impair mussel feeding, interfere with fish spawning and prey identification, and alter substrate. Higher water temperature could decrease dissolved oxygen resulting in shifts in the composition of aquatic organisms. Potential adverse impacts to species of conservation concern should be evaluated in advance of granting changes to water quality standards in these streams.

It is of note that prior to construction of the facility, SWEPCO was made aware of the presence of species of conservation concern in these waterways and the need to maintain water quality. Assurances were given by the company that the facility would not adversely impact water quality. It is important that the water quality of the above mentioned rivers be maintained.

The opportunity to comment is appreciated.

Sincerely,

Cindy Osborne
Data Manager/Environmental Review Coordinator

Enclosure: Attachment A (Aquatic Species list)

Aquatic Elements of Conservation Concern

Little River

Arkansia wheeleri, Ouachita rock pocketbook – Federal Concern (endangered)

Cycleptus elongatus, blue sucker – State Concern

Hiodon alosoides, goldeye – State Concern

Quadrula apiculata, southern mapleleaf – State Concern

Quadrula metanevra, monkeyface – State Concern

Red River

Ammocrypta clara, western sand darter – State Concern

Atractosteus spatula, alligator gar – State Concern

Cycleptus elongatus, blue sucker – State Concern

Polyodon spathula, paddlefish – State Concern