

PO Box 61
Mountain Home, Arkansas 72654



Monday, November 23, 2015

reg-comment@adeq.state.ar.us

Mr. Doug Szenher
ADEQ Public Outreach and Assistance Division
5301 Northshore Drive
North Little Rock, AR 72118

RE: The Cities of Harrison and Yellville Joint Petition to Initiate Third Party Rulemaking to Amend Regulation 2 With Respect to Default Water Quality Criteria for Crooked Creek

Based on the information made public, and the statement by the cities that they are not seeking a change from historical water quality conditions in Crooked Creek and that they are seeking standards that reflect actual water quality, allowing them to be compliant with their permit; and, based on the statement that TDS concentrations upstream of the wastewater treatment facility already exceed the current site-specific standard of 200mg/L, we, Friends of the North Fork and White Rivers (Friends) does not oppose the amendment as originally proposed by the cities.

However, on the two questions regarding the consideration of rounding the specified criteria between the 95th and 99th percentile, Friends respectfully and strongly urges this subject be considered in a separate process due to the probable statewide application.

Additionally, Friends encourages the cities to continue to strive to operate at the highest level of regulatory requirements and to seek feasible means of improving water quality rather than pursuing, in the future, a downgrade of the underlying water quality. Friends desires to be a partner with the cities in maintaining the integrity of Crooked Creek waters.

Sincerely,

Sam D. Cooke

Sam D. Cooke
President, Friends of the North Fork and White Rivers
Cc: Board of Directors

Friends of the North Fork and White Rivers is an Arkansas 501(c)(3) non-profit organization devoted to creating an ongoing dialogue where individuals, groups, and government agencies can work together to conserve, restore and enhance these beautiful rivers.