

**From:** [beth\\_ardapple](#)  
**To:** [Public Comment](#)  
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Secretary Becky Keogh  
Arkansas Department of Energy and Environment  
5301 Northshore Drive  
North Little Rock, AR  
72118-5317

September 8, 2020

Dear Secretary Keogh,

I appreciate the opportunity to submit our comments on the proposed 2019 triennial revisions to Regulation 2: Regulation Establishing Water Quality Standards for Surface Waters of the State of Arkansas.

I encourage you to lead the state of Arkansas in strengthening and clarifying water quality standards to make Arkansas a leader in the nation for future generations. Many people and businesses are recognizing that clean water resources are the new gold when it comes to a state's health and economy. Without its abundance of beautiful waters, Arkansas would not be the prime destination for millions of outdoor visitors or businesses that depend upon and benefit the tourism industry.

Unfortunately, there appears to be a competition, instead of a coordination between agricultural growth and water related economies. When waters deteriorate from under-regulated nonpoint sources or point sources, people stop visiting and investing in retirement or vacation homes, local restaurants, and shops, and other entrepreneurial enterprises that are related to this prime natural resource dry up as well. It would be of great service to the people of Arkansas, and the state's future to make sure that clear numerical standards are set in place to safeguard the remaining threads of Arkansas' pristine streams, rivers and waterways for the future.

If our state is going to perpetuate and guard the quality of its water resources, it is necessary that Arkansas strengthen its Water Quality Standards to include clear language that addresses:

1. Easy public access to all DEQ Water Quality regulations and documents.
2. Definition of storm flow as water flow above base level flow.
3. Dates of the primary contact season for harmful algal blooms that correlate to real climate norms and public recreational uses.
4. An anti-degradation implementation assessment.
5. Definition of how water bodies are designated, evaluated, and maintained.

6. Streams that flow into or contribute to an Extraordinary Resource Water, Ecologically Sensitive Waterbody, Natural and Scenic Waterways or Tier III Streams have the same designation as the receiving main stream.
7. Public reviews of short-term activities that risk eroding water standards.
8. Establish a number of days for "persistent nature" of solid, floating material and Deposits.
9. Add Harmful Algal Blooms into toxic substances text.
10. Revise bacteria standard to be consistent with EPA's Recreational Water Quality Criteria.
11. Increase safety standards for bacteria by extending Primary Contact Season to reflect more early spring and late fall use.
12. Implement numeric nutrient criteria for phosphorus and nitrogen.

Although it may seem cost prohibitive to ensure our waters are protected in the manner outlined above, it will be incredibly more costly to attempt to remedy degraded waters that will encumber future generations. We all know and love children who we care for deeply. We can't honestly afford to burden them with the kind of clean-ups and remediations that current Reg 2 standards will inevitably entail. This is a real time opportunity to prevent such expensive and harmful consequences for the future of the great state of Arkansas. Under your guidance, you can make sure that Reg 2 is revised to assure the preservation and conservation of our greatest resource. We depend upon your leadership.

Sincerely,

Beth Ardapple  
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