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Arkansas Game and Fish Commission

February 5, 2025

Basil V. Hicks III
Division of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Re: Docket No. 24-005-R; Proposed Amendments to Rule 2, "Rule Establishing Water Quality Standards for Surface Waters of the State of Arkansas"

Dr. Hicks,

Staff members of the Arkansas Game and Fish Commission (AGFC) have reviewed Docket No. 24-005-R, Petition to Initiate Rulemaking to Amend Rule 2, "Rule Establishing Water Quality Standards for Surface Waters of the State of Arkansas," (Rule 2). We have the following recommendations:

- AGFC recommends that Rule 2 adopt numeric nutrient criteria for water quality standards. Numeric criteria more accurately reflect water quality than the narrative criteria currently being used.
- AGFC recommends expanding the list of Ecologically Sensitive Waterbodies (ESW) to accurately reflect the location of Threatened and Endangered (T&E) species listed under the federal Endangered Species Act and, high priority Species of Greatest Conservation Need (SGCN). While we appreciate, and are supportive of, this proposal's effort to update the list of T&E and SGCN species that occur in existing ESW streams, updating the ESW to reflect T&E and SGCNs where they occur throughout the state is appropriate.
- AGFC supports the removal of the trout water designation on the waterbodies listed in the Rule 2 proposed changes

The opportunity to review and provide comments on the Rule 2 proposed amendments is appreciated. If you have any questions or need additional information from our agency please contact Jennifer Sheehan at Jennifer.sheehan@agfc.ar.gov or 501-680-0319.

Sincerely,

Brad Carner
Deputy Director

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The Arkansas Game and Fish Commission's mission is to conserve and enhance Arkansas's fish and wildlife and their habitats while promoting sustainable use, public understanding and support.