

Khan, Faizan

From: CPP-antideg-comments
Sent: Thursday, October 1, 2020 7:58 AM
To: Carroll, Zachary; McWilliams, Carrie; Khan, Faizan; Leamons, Bryan
Subject: FW: AIM and CPP Public Notice Comments - Attachments
Attachments: ADA - NRD (AIM Comments).pdf; ADA - NRD (CPP Comments).pdf

From: Breegan Andersen
Sent: Thursday, October 1, 2020 7:58:02 AM (UTC-06:00) Central Time (US & Canada)
To: CPP-antideg-comments
Subject: AIM and CPP Public Notice Comments - Attachments

Hello,

The Arkansas Department of Agriculture, Natural Resources Division appreciated the opportunity to participate in stakeholder meetings to provide comments about the proposed Antidegradation Implementation Methodology (AIM) and the Continuing Planning Process (CPP). Attached you will find our comments for the AIM and CPP, respectively.

Best,

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Natural Resources Division

The Arkansas Department of Agriculture appreciates the opportunity to participate in a series of stakeholder meetings to discuss the proposed changes to water policy in Arkansas. We offer the following comments on the proposed Continuing Planning Process (CPP):

Comments

Chapter 4.15.6 Total Phosphorus

We advise ADEQ to consider adding monitoring and reporting requirements to new and expanding activities discharging to a waterbody identified as Category 3 for nutrients.

Chapter 1.12.2 Non-point Source Controls

The website link should be updated to <https://www.agriculture.arkansas.gov/natural-resources/> as the Arkansas Natural Resources Commission was merged with the Department of Agriculture under the Transformation and Efficiencies Act of 2019.

Chapter 5.1 Monitoring Location

ADA encourages ADEQ permit engineers to consult with the Office of Water Planning Branch personnel to determine the best monitoring locations.

Chapter 7 Public Participation & Notice

As outlined for interagency coordination, the ADA respectfully requests any advance notice to provide input on permitting actions.

Other Comments:

We recommend that the antidegradation review procedure be included within the CPP in Chapter 7, as an appendix, or at minimum, an embedded link to the methodology be provided.