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From: [ALICE](#)

Sent: Friday, October 2, 2020 4:26:40 PM

To: [CPP-antideg-comments](#)

Subject: Comments AIM and CPP 2020

Importance: Normal

Attachments: [October 2020 AIM and CPP comments.docx](#) ;

October 2, 2020

HOW CAN THE ANTIDEGRADATION IMPLEMENTATION PLAN BE IMPLEMENTED WITHOUT NUMERIC CRITERIA?

Thank you for the opportunity to comment. Please see attachment.

Alice B. Andrews
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October 2, 2020

Thank you for the opportunity to comment on the draft 2020 “Antidegradation Implementation Methods” (AIM) and the 2020 draft Continuing Planning Process (CPP).

AIM is about how to conduct Antidegradation reviews when NPDES permits are issued. Non-point source discharges/activities are not exempt from anti-degradation rules.

These draft proposals are very complex and based, one hopes, on solid scientific processes. They are difficult to comprehend by the general, but interested, public. A significant amount of time and study is required in order to make reasonably well-informed comments. There has not been enough time (even with the extension granted by DEQ) allotted for adequate public study and comment.

My request is please seriously consider comments submitted, then provide two more months (60 days), for additional comments, before sending final comments to EPA.

Arkansas is blessed with an abundance of Extraordinary Resource Waters and Wild and Scenic streams. If I recall correctly, 55 streams, roughly beginning in the late seventies/early eighties by the Arkansas Scenic Rivers Commission. These streams are protected by the anti-degradation policy, whereby the water quality of these streams cannot be lowered except for some limited short-term/temporary actions.

Some +/- 34 years have passed without ADEQ establishing “numeric” nutrient criteria/standards for these pristine streams excepting dissolved O₂ and bacteria, particularly E.coli. Arkansas continues to use “narrative” criteria. Why? Yes, it is expensive, so is clean water. It requires many tests, a consistent sampling, testing and monitoring program for Arkansas waterbodies, considering baseline, low and high flows of the streams and more. Protecting the waters of Arkansas should be one of Arkansas’ top priorities. Clean water impacts the health and lives of every Arkansan. Surely, some way, somewhere the \$\$\$ can be found!

How can the Anti-degradation Policy be implemented without numeric criteria? Aspirational... why not get started with Phosphorus and Nitrogen criteria limits?

I wish to include by reference, word for word, the comments of Dr. David Peterson (Ozark Society), BRWA, Ellen Carpenter, Teresa Turk, Jessie Green and Dane Schumacher.

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