

Erin Scott
Ozarks Water Watch
1200 W Walnut Street
Rogers, AR 72758

August 20, 2020

Arkansas Department of Energy and Environment
5301 Northshore Drive
North Little Rock, Arkansas 72118

RE: Request for Extension of Public Comment Periods for Draft Antidegradation Implementation Methodology (AIM) and Continuing Planning Process (CPP) Documents

Via email to:
keogh@adeq.state.ar.us and
CPP-antideg-comments@adeq.state.ar.us

Dear Secretary Keogh,

Your Department of Energy and Environment – Division of Environmental Quality (DEQ) issued a public notice on Sunday, July 26, 2020 for a 30-day public comment period for the State’s Draft Antidegradation Implementation Methodology (AIM) and update to the Continuing Planning Process (CPP) documents. This makes public comments due by August 26, 2020. Ozarks Water Watch respectfully requests extensions of the public comment periods for these documents, for at least an additional 60 days.

The AIM involves complex processes that requires a great deal of time to understand and evaluate. We believe that 30 days is not adequate to fully comprehend the language within the document and the content of other regulatory or guidance documents which the AIM references. As the first draft of its kind for Arkansas, we ask that DEQ take all necessary steps to receive valuable input from stakeholders and the public, which can only be done with additional time for public comment.

The CPP document is 117 pages of technical material, updated from the current 20-year old version. Again, a 30-day comment period is inadequate to fully comprehend and provide substantial input and comments on this document.

While these documents taken alone require more than a 30-day comment period, an extended comment period is certainly warranted given the fact that these documents are being processed concurrently, and overlapping with the public comment period for proposed changes to Regulation 2 (due September 8, 2020).

DEQ AIM and CPP Documents
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Again, when stakeholders and the public are afforded adequate time to engage in the process, the State will develop more well-rounded and robust AIM and CPP documents. Extending the public comment period by at least 60 days will provide much needed time for individuals and organizations to develop substantive comments so the State can submit the best possible AIM and CPP to the Environmental Protection Agency.

Thank you for your consideration of our request to extend the public comment periods for the AIM and CPP documents. We hope to hear back from you that an extension is granted.

Sincerely,

Erin Scott
Senior Policy and Program Director
Ozarks Water Watch

Cc via email to Ozarks Water Watch Staff:
Cathy Stepp (cathy@ozarkswaterwatch.org)
David Casaletto (dcasaletto@ozarkswaterwatch.org)