

Archived: Friday, October 2, 2020 10:47:57 AM
From: Marti Olesen
Sent: Friday, October 2, 2020 10:31:44 AM
To: CPP-antideg-comments
Subject: CPP/Anti-degradation comments
Importance: Normal

Dear Director Keogh,

We are truly hopeful that the outcome and continued revision of the draft ADEQ Anti-degradation Implementation Methodology (AIM) and Continuous Planning Process (CPP) could make Arkansas' division of environmental quality accountable for assessing water quality correctly, and will work to keep our scenic and outstanding waters from being degraded.

This is the clear and present opportunity for Arkansas to rise above neighboring states in valuing its greatest resource, not only for tourism and drinking water, but for the future health of its residents and its economy. Even Oklahoma, right next door, and not particularly known for its environmental prowess or awareness, has higher standards for phosphorus than we have here in Arkansas. That fact should be a wake up call. When even the EPA makes comments that ask Arkansas to improve its assessments and standards, ADEQ should take these seriously and rise to assure a future of clean, fresh, pure water for our "natural state" to ensure it will remain a "land of opportunity".

We wholly support and adopt the following points made by the Buffalo River Watershed Alliance, as well as adopting all of BRWA's formal submitted comments. ADEQ must act now to protect the high quality waters of Arkansas and make sure that harmful amounts of pollutants do not enter our waterways. The consequences of ADEQ inaction and laissez faire regulations will become more expensive for our state and our children than what seems to be a high cost of having enforceable standards now. Cleaning up waterways is like taxing the future for our stalling in the present. Take a look at the current news in Texas about the brain eating bacteria in the drinking water supply of the city with 27,000 residents. <https://www.cbsnews.com/news/brain-eating-amoeba-texas-water-safe-2-3-months/> The projected clean up time is months, not days or weeks. Consider the cost of this cleanup. Arkansas can avoid such outcomes here by putting in place measures that require pollutants to be curtailed with strong numerical, not narrative criteria. Will you please act now to revise these draft revisions to ensure Arkansas' future? It is truly in ADEQ's hands.

Sincerely,

Larry and Marti Olesen
P.O. 104
Ponca, AR

- BRWA points we adopt and submit:
- 1) The Antidegradation Implementation Methodology (AIM) is a Clean Water Act requirement and state regulation which details how the tiers of water quality protection are applied to waters and the process to allow lowering of water quality in a high quality water..
 - 2)The Continuing Planning Process (CPP) is also required by federal law under the Clean Water Act and its general purpose is to describe the principal operational procedures of the state's water quality management programs and permits

We ask for rules which protect the streams and lakes we use for drinking water, fishing, swimming, and boating, and call for policies which:

- Protect high quality streams in our state and national parks, wildlife refuges, and wilderness areas from new pollution.
- Include all upstream tributaries in the designation of Outstanding Water Resources. A pristine river is the sum of its clean streams.
- Properly establish protected baseline water quality through testing and data analysis for all streams.
- Require existing permitted facilities to undergo an anti-degradation review process.
- Account for nonpoint sources of pollution when making point source permitting decisions.
- Adopt numeric rather than narrative standards for water quality determination
- We ask for an additional public comment period on the AIM in order to see the final version of Regulation 2