

From: [Stroman, Justin](#)
To: [ImpairedWaterbodies Comments](#)
Cc: [Wise, Jim](#); cindy@arkansasheritage.org; ["matt.mcnaire@arkansas.gov"](mailto:matt.mcnaire@arkansas.gov); ["Melissa_Lombardi@fws.gov"](mailto:Melissa_Lombardi@fws.gov)
Subject: 2016 303(d) list of impaired streams and waterbodies
Date: Wednesday, March 16, 2016 8:53:47 AM
Attachments: [AGFC_response_303d.pdf](#)

Jim

Please find attached our agency's comment letter regarding the most recent list of impaired streams and waterbodies in the state. We appreciate the opportunity to comment. Please let me know if there are any difficulties accessing the attachment. Thanks.

Justin Stroman

Federal Regulatory Program Biologist

E: Justin.Stroman@agfc.ar.gov | P: 501-223-6409 | M: 501-747-4034

Arkansas Game and Fish Commission

2 Natural Resources Dr. | Little Rock, AR 72205

P: 800-364-4263

www.agfc.com



Jeff Crow
Chief of Staff and Deputy Director
Andrew Bass
Assistant Deputy Director

Arkansas Game and Fish Commission

Mike Knoedl
Director

Ricky Chastain
Assistant Deputy Director
Caroline Cone
Assistant Deputy Director

March 16, 2016

Mr. Jim Wise
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: 2016 List of 303(d) Impaired Waterbodies

Mr. Wise,

Biologists with the Arkansas Game & Fish Commission (AGFC) have reviewed the proposed 2016 list of impaired waterbodies. AGFC would like to offer the following comments in regards to this proposed list:

- 1.) Biologists have concerns with the re-classification of the North Fork River on the 303(d) list from a Category 5 to a Category 1a-Non-Impaired Stream with a TMDL. Our agency has also received several calls and e-mails from concerned stakeholders regarding this issue. Upon reviewing the 2009 TMDL addressing Dissolved Oxygen (DO) concerns in the North Fork, many of the justifications for keeping the North Fork on the 303(d) list still are applicable. There appears to also have been a misconception that a liquid oxygen injection system was installed at Norfork Dam. No such system was installed, there was merely a test conducted in 2009. To reclassify the waterbody based on a test conducted in 2009 would be inappropriate. It also appears the only data that ADEQ considered for DO during the period of record was at the River Ridge Road monitoring station. This station is located approximately 3 miles downstream of the Norfork Dam. Since 2009, two to three USGS gages have been located directly below Norfork Dam that provide continuous (hourly) DO readings during critical periods (May through December). August, September, and the beginning of October are especially notable in that DO levels are well under the state water quality standard of 6.0 mg/L. DO levels are typically around 4.0 mg/L during this period. We request that ADEQ obtain DO data from the appropriate gages prior to making a final decision to categorize Norfork as Category 1b- Non-Impaired Stream with a TMDL. To utilize only one monthly DO reading from the River Ridge Gage (~3 miles downstream) is inappropriate since it is not representative of the overall DO conditions during the critical period. These data are available from both USGS and the USACE upon request.
- 2.) Biologists also have concerns with the de-listing of the Eleven Point River as being impaired due to exceeding the turbidity standard. The Eleven Point River is one of the last rivers that the federally listed Ozark Hellbender is found. The Ozark Hellbender faces

2 Natural Resources Drive • Little Rock, AR 72205 • www.agfc.com
Phone (800) 364-4263 • (501) 223-6300 • Fax (501) 223-6448

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.

a rapid, range wide decline due to the increasing sediment loading occurring within the streams. Land use practices, such as the clearing of riparian corridors to increase pasture land acreage, have resulted in mass wasting events of erodible soils along the river banks. These fine sediments accumulate in the interstitial spaces between cobbles, limiting the ability for Hellbenders to utilize these spaces for nesting cavities and refugia. These Suspended Sediments Concentrations, while being a distinct water quality criterion from Total Suspended Solids and Turbidity, do have a functional relationship with each other. We would encourage further monitoring stations or sampling events within the Eleven Point River. With changing agricultural practices rapidly occurring in the basin, and the fact that this river remains one of the last vestiges of the declining Ozark Hellbender, we recommend that this river remain on the 303(d) list as a Category 5 impaired stream. The potential loss of Clean Water Act section (319) funding availability to this basin is concerning.

- 3.) AGFC Biologists are also concerned with the Dissolved Oxygen levels of Big Creek, a Buffalo River tributary in Newton County near Gene Rush Wildlife Management Area. Summer algal blooms, likely caused by excess nutrient levels, appear to be impairing this creek. Smallmouth bass require 6.0 mg/L DO for optimal growth, and this water quality standard is not being met for several months of the year, per the USGS gage station at Big Creek. We concur with the recommendations of the National Parks Service that Big Creek should be considered for the list of 303(d) streams.

The AGFC appreciates the opportunity to comment on the 2016 list of 303(d) impaired waterbodies.

Sincerely,



Chris Racey, Chief – Fisheries Division