

**From:** Ellanorah Wilson <comments@whiteriverwaterkeeper.org>  
**Sent:** Monday, September 10, 2018 11:34 PM  
**To:** comments@whiteriverwaterkeeper.org; WaterbodyComments; wilson\_mountain@windstream.net  
**Subject:** Ellanorah Wilson Comments re: Draft 2018 303(d) List  
**Attachments:** Public Comments on Arkansas's Draft 2018 303(d) List of Impaired Waterbodies 2018 303d Comments.pdf  
**Categories:** Saved to Folder, PDF Created

Below are comments submitted by Ellanorah Wilson through White River Waterkeeper's public comment form. Please confirm receipt of this submission.

<b>Email address</b>	<a href="mailto:wilson_mountain@windstream.net">wilson_mountain@windstream.net</a>
<b>Full Name</b>	Ellanorah Wilson
<b>Mailing Address</b>	32 E. River Heights / POBox 475, Bigelow, AR 72016
<b>Your connection to Arkansas waters</b>	Kayaker & swimmer
<b>Has nuisance algae affected your recreation experiences?</b>	Yes
<b>How are you affected by Arkansas Water Quality</b>	I am an Arkansas resident. I recreate on or near a river, lake, or stream. I care about all water quality.
<b>Nuisance Algae</b>	

**Provide specific information about the waterbody or waterbodies where nuisance algae have been observed.**

Buffalo River - several different sections. Near Big Creek & down river.

**In the examples you described above, would you consider observed algal densities to be "objectionable?"**

Yes, all were objectionable in my opinion.

### **Habitat Degradation**

**Have declines to physical habitat impacted your recreation experiences?**

Not applicable.

**Please describe your observations of water quality degradation due to changes in habitat.**

The enjoyment of the river is reduced in the areas where algae is heavy. I do not swim in those areas. The beauty of the river is less. I understand some algae is normal but I have never seen it this bad.

**How are you impacted by water quality degradation attributed to habitat declines?**

I am less likely to bring family and friends to the areas with heave algae. This summer I even took them to other places to paddle to avoid it.

### **Categorical Determinations**

**Do you believe in state-led local approaches?**

No

**Do you think it is important to ensure federal regulations are met when proposing a plan to restore significant state and federal natural resources, such as the Buffalo National River?**

Yes

**Do you believe it is important for any plan to include both point and nonpoint sources of pollution?**

Yes

**At this time, do you believe ADEQ should follow the Clean Water Act and federal regulations to prioritize impaired waterbodies for a TMDL until they have provided adequate recommended documentation (2016 IRG) and met all legal requirements (40 CFR 130.7)?**

Yes

**Federal Requirements**

**Do you believe ADEQ should consider peer-reviewed literature, tax-payer funded research, expert reports, and agency recommendations to identify and report water quality impairments?**

Yes

**35% of variable 106 Grant Funding received by the state each year is dependent on impairment listings. When assessment methodologies are lacking or absent, how should the state proceed with assessment decisions?**

Even though I understand I would have the opportunity to review justifications and provide public comments on any 303(d) listings utilizing best professional judgement and a weight-of-evidence approach, I do not support ADEQ making any case-by-case decisions when methodologies were not predetermined.

**How strongly do you feel that designated Outstanding National Resource Waters (e.g., Buffalo, Strawberry, Spring, Eleven Point, and Mulberry Rivers) should be allowed to violate water quality standards LESS frequently than channelized streams (aka ditches)?**

Very strongly. We have a limited number of waters with ONRW designations in the state. As "The Natural State" we should hold our most protected waters to a higher level of expectation.

**When numeric criteria do not exist, and narrative descriptions of water quality standards are in place,**

Consider all relevant data and information and take a weight-of-evidence approach to developing a determination. The state must provide a rationale and supporting documentation with assessment decisions. As long as the state is forthcoming and transparent, I believe best professional judgement, supported with scientific

**how do you think the state should proceed with assessments?**

evidence, has an appropriate place in this regulatory process.

**States are required to develop their lists based on EPA approved Water Quality Standards. Although states may anticipate changes, states are not allowed to incorporate revised criteria until EPA has approved them for Clean Water Act purposes (e.g., development of list of impaired waters). Do you think this federal requirement is important to follow?**

Yes. The EPA approval process ensures water quality standards are backed by defensible science. This is essential for protecting and restoring water quality.

**Do you believe pictures should be considered for determining if water quality criteria are being met, such as determining whether algae have reached "objectionable" densities?**

Yes

**Do you think waterbodies should be listed as impaired when scientifically defensible research confirms population declines to federally threatened and endangered**

Yes. Of course. Properly identifying waters is important to the recovery of imperiled species.

species?

**Additional Comments**

**Will you be submitting pictures to ADEQ in a separate email or have you already?**

No

**Do you wish to grant White River Waterkeeper permission to post your comments on our website?**

Yes

**Do you think ADEQ should post comments on their website as they come in, and as is standard protocol for other administrative procedures carried out by the Department?**

Yes. This is important to public transparency, allows commenters to ensure their comments were received, and serves as a valuable resource to the public and press.

**Do you have any scientific reports or studies that you wish to submit to ADEQ to supplement your comment record?**

No

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