

From: Heather smith <comments@whiteriverwaterkeeper.org>
Sent: Monday, September 10, 2018 4:19 PM
To: comments@whiteriverwaterkeeper.org; WaterbodyComments; heathermabelle.s@gmail.com
Subject: Heather smith 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

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

Email address	heathermabelle.s@gmail.com
Full Name	Heather smith
Mailing Address	1222 NE Monroe
Your connection to Arkansas waters	I grew up in arkansas and have love being on the rivers and hiking in our beautiful state. Keeping these rivers clean is detrimental to our health, animals, and impacts the environment heavily.
Has nuisance algae affected your recreation experiences?	Yes
How are you affected by Arkansas Water Quality	I am an Arkansas resident.
Nuisance Algae	

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

Buffalo 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?

Yes

Categorical Determinations

Do you believe in state-led local approaches?

Yes

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

Yes

River?

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

ADEQ should be proactive and protective when making assessment decisions. EPA does not approve Assessment Methodologies, just that whatever rationale is

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?

provided for an assessment be scientifically valid. ADEQ employs nearly a dozen biologists and ecologists in the Water Division. I trust that they can apply themselves to develop a sufficient rationale to justify decisions when defined methodologies are absent.

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

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 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

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

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?

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 species?

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

Additional Comments

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

No

Do you wish to grant White River

Yes

**Waterkeeper
permission to post your
comments on our
website?**

**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

Send recurring emails with [Email Scheduler](#) for Gmail.

This email was sent via the [Google Forms Add-on](#).