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Full Name	Jeffrey Hood
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Your connection to Arkansas waters	My family and I frequently visit the Buffalo River as well as numerous other lakes across Arkansas. We utilize these areas to canoe/kayak as well as hunt and hike.
Has nuisance algae affected your recreation experiences?	Yes
How are you affected by Arkansas Water Quality	I am an Arkansas resident. I recreate on or near a river, lake, or stream.
Nuisance Algae	
Provide specific information about the waterbody or waterbodies where nuisance algae have been observed.	Buffalo River, Newton County(Arkansas) between Tyler Bend and Gilbert
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.	Buffalo River, Newton County(Arkansas) We were unable to swim and fish without struggling with the widespread algae.
How are you impacted by water quality degradation attributed to habitat declines?	Recreation

Categorical Determinations	
Do you believe in state-led local approaches?	Usually I do, but when a state-led approach has failed its citizens then I would greatly appreciate federal assistance.
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, taxpayer 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.	Even though I understand I would have the opportunity to review justifications and provide public comments on any 303(d) listings

When assessment methodologies are lacking or absent, how should the state proceed with assessment decisions?

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, 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 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

Yes

**"objectionable"
densities?**

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

No

**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