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September 10, 2018

Ms. Sarah Clem
Arkansas Department of Environmental Quality
5301 Northshore Dr.
North Little Rock, AR 72015

RE: Public Notice: 2018 303(d) draft list of impaired waterbodies in Arkansas

Ms. Clem,

The Arkansas Game and Fish Commission has reviewed the 2018 303(d) list of impaired waterbodies within the state of Arkansas. We offer the following comments and questions regarding this draft list.

Little Osage Creek (AR_11110103_630 & AR_11110103_933) is categorized as a 4b impairment for non-attainment of the pathogen water quality standard. Category 4b states that "Other management alternatives are expected to result in the attainment of the water quality standard". I assume this management alternative is the watershed management plan developed by FTN for the Upper Illinois River basin. There has been a significant degree of new urban development within the Little Osage watershed in the past two years. We would encourage the Department to examine whether developers and landowners have truly bought in to the watershed plan and if the voluntary recommendations are being followed. Have there been any signs of improvement since the publication of the watershed management plan? The management plan identified failing septic systems as a possible source of contamination. With the increase in new homes being developed, is this still the case? The Little Osage is of particular interest to the AGFC, as it is home to numerous fish Species of Greatest Conservation Need (SGCN), as well as serving as a Clean Water Act mitigation site for the Department of Transportation.

The Middle Fork Saline River (AR_08040203_019) & The Alum Fork Saline River (AR_08040203_014) have been designated as a category 5 (medium) impairment due to non-attainment of the Dissolved Oxygen (DO) water quality standard. These upper tributaries of the Saline River contain numerous SGCN, as well as a federally protected mussel species under the Endangered Species Act. One such SGCN species, the Ouachita Madtom, is a particularly rare Arkansas endemic fish that prefers the cool, gravel streams of the Saline River forks. The Arkansas Fatmucket, the federally listed mussel that occurs in this river, is found in areas with moderate flow. Since there is some correlation between DO and water flow, we agree with the decision to classify these segments as category 5 streams, and would suggest increased monitoring within this system due to the numerous rare species and outstanding water designations of this stream.

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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.

The Cossatot River (AR_11140109_018) is proposed to be designated as a Category 5 (medium) impairment for DO. The federally threatened Leopard Darter has been recently documented within this segment in critically low numbers. AGFC thermal monitoring has shown rapid warming within the river, and our biologists working in the river have noticed problematic filamentous algae, at times so prolific in inhibited our ability to conduct surveys for Leopard Darters. There is likely a direct correlation between the low dissolved oxygen and the proliferation of algal growth within the river. While the exact source of this increased temperature remains unknown, it is having a drastic impact on the continued survival of the Leopard Darter within this segment of the Cossatot. The AGFC agrees with this categorization of impaired due to DO. We would suggest that the Cossatot be considered a high priority however.

The Kings River (AR_11010001_037) shows a category 5(low) impairment due to Total Dissolved Solids. The federally endangered Snuffbox mussel is found within this river, and is a particularly rare mussel within Arkansas (S1 rank). Due to the presence of this mussel, as well as several other mussel SGCNs, we would like some justification for the low prioritization for this stream segment.

The Arkansas Game and Fish Commission appreciates the opportunity to comment on the Department's 303(d) list. We also appreciated the opportunity to participate in the Assessment Methodology stakeholder discussions. While we there were occasional points of disagreement, the transparency and stakeholder involvement in the assessment methodology process was a welcome change.

Sincerely,



Justin Stroman
Environmental Coordination Biologist
Arkansas Game and Fish Commission.