From: <u>Linda Sue Goosen</u>

To: comments@whiteriverwaterkeeper.org; WaterbodyComments; lindasgoosen@comcast.net

Subject: Linda Sue Goosen Comments re: Draft 2018 303(d) List

Date: Saturday, September 8, 2018 1:42:17 PM

Attachments: Public Comments on Arkansas"s Draft 2018 303(d) List of Impaired Waterbodies 2018 303d Comments.pdf

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

Email address	lindasgoosen@comcast.net
Full Name	Linda Sue Goosen
Mailing Address	319 Santa Fe Trail Little Rock AR 72205
Your connection to Arkansas waters	I have floated the Buffalo River
Has nuisance algae affected your recreation experiences?	Not Applicable
How are you affected by Arkansas Water Quality	I am an Arkansas resident. I have a business or property in Arkansas. I recreate on or near a river, lake, or stream.
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.	I haven't floated in several years but the question is a no brainer-toxic algae will kill the fish and no one will want to swim in mucky water.
How are you impacted by water quality degradation attributed to habitat declines?	Recreation on my National River
Categorical Determinations	

Do you believe in state-led local approaches?	I believe in getting the river clean and keeping it that way. The hog farm should be shut down. The permit process was not open to public comment and as such it is operating on an invalid permit.
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?	Clean the river-it's a national River so something is woefully wrong if federal law is not protecting it.
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)?	Clean the hog farm up or get rid of it. Stop letting it pollute the river. If you don't the people of this state will make sure that we vote for someone who will.
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?	It only takes a minimum level of the understanding of biology to realize what is happening. Forget lengthy, unnecessary, expensive studies that will only allow further contamination of the river.
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?	I will trust only the decision to shut down the hog farm
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?	The hog farm is polluting the river. Get it cleaned up
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	The EPA under its current head is not reliable to have the quality of our water as its priority

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?	They are a source of documentation of evidence of deterioration of water quality
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?	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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