

From: [Sandra Avra](#)
To: comments@whiteriverwaterkeeper.org; [WaterbodyComments](#); sbnet@sbcglobal.net
Subject: Sandra Avra Comments re: Draft 2018 303(d) List
Date: Tuesday, September 4, 2018 1:17:22 PM
Attachments: [Public Comments on Arkansas's Draft 2018 303\(d\) List of Impaired Waterbodies 2018 303d Comments.pdf](#)

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

Email address	sbnet@sbcglobal.net
Full Name	Sandra Avra
Mailing Address	1914 Jennifer Drive, Little Rock, AR 72212
Your connection to Arkansas waters	Love to canoe and fish the Buffalo River.
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.	Algae growth is polluting this river and interferes with recreation. It mars the beauty of this National River. It hurts tourism. This is directly related to allowing a hog farm and the water from hog waste to pollute the aquifer and drain into the 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	Yes

experiences?

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

The water is polluted, green with algae and no doubt pathogenic bacteria from hog wastes at a dangerous level...killing fish, wild life, and making it unsafe to swim or canoe.

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

My recreation on the river in a canoe or fishing impacts me. As a citizen of the state when tourism is affected there it impacts the states economy and jobs.

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?

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

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