



Department of Energy
Southwestern Power Administration
One West Third Street
Tulsa, Oklahoma 74103-3502

September 10, 2018

Caleb Osborne
Associate Director, Office of Water Quality
Water Quality Planning Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118.

RE: Comments on Arkansas Draft 2018 303(d) List

Dear Mr. Osborne,

This letter provides the comments of Southwestern Power Administration (Southwestern) on the Arkansas Department of Environmental Quality (ADEQ) Draft 2018 303(d) List. Southwestern is an agency within the U.S. Department of Energy that markets hydroelectric power from 24 multi-purpose Federal water resources projects constructed and operated by the U.S. Army Corps of Engineers (Corps), in the states of Missouri, Arkansas, Oklahoma, and Texas. Those projects include Beaver, Bull Shoals, Dardanelle, Degray, Greers Ferry, Greeson (Narrows Dam), Norfolk, Ouachita (Blakely Mountain Dam), and Ozark Lakes in Arkansas. By statute, Federal hydropower serves not-for-profit customers, largely rural electric cooperatives and municipalities, in the four previously mentioned states as well as Kansas and Louisiana. Additionally, Southwestern is obligated to repay the Federal investment, with interest, and all expenses allocated to the hydropower purpose in the water resource projects with revenues received from the sale of power. Therefore, Southwestern has a clear and direct interest in any activities which may impact the operation of these projects, which directly influences Southwestern's ability to fulfill Federal contractual obligations and repayment to the Federal Treasury.

Southwestern appreciates ADEQ's attendance at the White River Dissolved Oxygen (WRDO) Committee meetings. The WRDO Committee is composed of various Federal and state agencies, and the meetings address the unique challenges to the tailwaters below Beaver, Bull Shoals, Norfolk, and Greers Ferry Dams in Arkansas, as well as Table Rock Dam in Missouri (collectively the "White River Dams"). Southwestern acknowledges the hard work by ADEQ personnel to develop the Continuous Data Assessment Methodology (CDAM); however, it was apparent during the spring 2018 meeting of the WRDO Committee that there are many questions surrounding the CDAM and how it could be implemented below the White River Dams in Arkansas. Mr. Jim Wise and Mr. Kris Naus of ADEQ did a great job explaining the methodology and identifying action items to further address questions as the CDAM is evaluated.

Southwestern hopes that ADEQ will continue to work with the WRDO Committee members as the CDAM is considered for the tailwaters below the White River Dams in Arkansas.

Please contact Tyler Gipson at 918-595-6685 or Tyler.Gipson@swpa.gov if you have any questions regarding our comments. Southwestern appreciates the opportunity to provide comments on the Draft 2018 303(d) List.

Sincerely,

A handwritten signature in black ink that reads "Tyler Gipson". The signature is written in a cursive style with a long horizontal flourish extending to the right.

For
Fritha Ohlson
Director
Division of Resources and Rates