

October 28, 2016

Mary Barnett
ADEQ Water Planning
5301 Northshore Drive
North Little Rock, AR 72118

Re: 2018 Assessment Methodology
ADEQ Water Division Public Listening Session of October 11, 2016

Dear Ms. Barnett,

The following comments are based on the ADEQ presentation made on October 11, 2016 regarding the upcoming 2018 Assessment Methodology. Per that meeting, the proposed process for the 2018 Methodology will consist of the following, at least as understood by Central Arkansas Water:

- Phase I – ADEQ gathering “input” information;
- Phase II – Presentation of that “input” information to a stakeholder workgroup for possible revisions of the 2016 Assessment Methodology;
- Phase III – Presentation of a draft 2018 Assessment Methodology for public comment.

Overall, Central Arkansas Water commends the ADEQ for undertaking the proposed process and looks forward to contributing to that process.

1. Comment: The ADEQ needs to define what “input” information is being gathered and will be presented to the stakeholder group. This is important because identifying which aspects of the 2016 Assessment Methodology that should be considered for revision will be dependent on what information is presented. Data, in and of itself, is normally not biased. However, what data is presented, putting that data in context, and interpreting how that data is related to ADEQ’s charge of protecting the waters of the state can be misconstrued, whether intentional or not. Specifying which “input” information will be gathered and presented will help to maintain the thoroughness and transparency of the ADEQ process.
2. Comment: ADEQ staff need to clarify the makeup and process for the stakeholder group; specifically, which stakeholder groups will be invited to participate; identify the representatives of each group; identify where the meetings will be held; identify whether the meeting will be open to the public; and identify whether a record of those meeting will be kept. Whether or not the above information is publicly provided will speak to the thoroughness and transparency of the Assessment Methodology process as well as ADEQ’s overall intentions.

3. Comment: Paramount for consideration in the 2018 Assessment Methodology should be the relationships between the ADEQ's Reg 2 Antidegradation Policy, Public Health, and the quality of those state waters used for public drinking water. Consideration of these relationships should take precedent over any other water quality issues. ADEQ and the stakeholder group need to be provided educational information on these relationships, on which waters of the state are used for public drinking water, and on which of those source waters are impaired or threatened. In particular, ADEQ needs to give special attention to the issues of the degradation of state waters due to elevated mineral levels, due to high fecal and E.coli counts, due to high turbidity levels, and due to elevated nutrient levels. Each of those contaminants has a direct correlation to the ability of public water systems to meet current and upcoming federal drinking water regulations, and their ability to provide drinking water that protects Public Health.

Thank you for the opportunity to submit these comments. Please feel free to contact me should you have any questions in this regard.

Sincerely,



Robert Hart, P.E.
Technical Services Officer

Cc: Darcia Routh, Engineering Section, Arkansas Department of Health
Randy Easley, CAW

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About this review

The Arkansas Department of Environmental Quality (ADEQ) is initiating a three phase review process for the Assessment Methodology.

ADEQ will gather input (Phase I) to present to a stakeholder workgroup who will discuss possible revisions to the 2016 Assessment Methodology (Phase II). An updated Assessment Methodology will be presented to the public (Phase III) for a formal comment and response process.

The final 2018 Assessment Methodology will be used during the 2018 303(d) assessment cycle.

The 2016 Assessment Methodology can be found here:

<https://www.adeq.state.ar.us/water/planning/integrated/assessment/pdfs/2016-assessment-methodology-draft-04apr16-305b.pdf>

Get involved

Input can be submitted for consideration by the stakeholder workgroup at the public listening session and beyond. All input must be received by 4:30 p.m. (CST), October 31, 2016.

Email submission:

am-comments@adeq.state.ar.us

Written submission:

Mary Barnett

ADEQ Water Planning

5301 Northshore Drive

North Little Rock, AR 72118.

Stay informed

Visit **<https://www.adeq.state.ar.us/water/planning/integrated/assessment/default.aspx>** to stay up to date on the review process, subscribe to the listserv, and view related documents.



Water sampling at DeGray Lake