



October 31, 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 presentation made on October 11, 2016 by ADEQ staff in reference to the upcoming 2018 Assessment Methodology.

In short, the proposed process for the 2018 Methodology was outlined as follows:

**Phase I** - ADEQ "Data Assembly" which is gathering information to be utilized for long-term trend analysis intended to determine use attainability and in meeting Section 305(b) of the Federal Water Pollution Control Act (hereinafter "Clean Water Act") requirements which requires that states perform a comprehensive assessment of the state's water quality to be reported to the U.S. Environmental Protection Agency (EPA) every two years;

Schedule: Public Listening Session – October 11, 2016  
Comments due – October 31, 2016  
Summary provided by ADEQ – November 2016

**Phase II** – Summarizing that information and providing to a stakeholder workgroup for possible revisions of the 2016 Assessment Methodology. ;

Schedule: Stakeholder work – December 2016 – January 2017  
Summary provided by ADEQ – February 2017

**Phase III** - Publication of a draft 2018 Assessment Methodology for public review and comment (30 day).

Schedule: Public Notice of Draft – March 2017  
Responses due – April 2017 (30 days after publication date)

ADEQ is to be commended in undertaking this more open process into the development of an assessment methodology. The following comments are made with regard to further enhancing this process.

**Phase I comment:** ADEQ should better define the specific information gathered and presented to the stakeholder group. As a drinking water provider, I feel that it is crucial to this process that the designation and determination of use attainment specifically for this designation be given additional review during the data input process. While ADEQ has stated that data made available that meets or meets or exceeds ADEQ's or USGS' QA/QC protocols, there is much data available through conventional drinking water compliance databases that may not be utilized due to variations in protocols. Typically, there is a fundamental difference between data gathered by ADEQ and USGS that drinking water utilities must utilize for management of these resources.

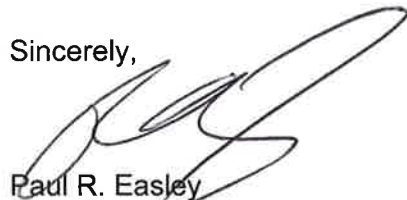
Additionally, if gaps are identified, ADEQ should take extra effort to exhaust all available data sources prior to determining use attainment/non-attainment. This could include extension of the timeline so that additional data sources could be obtained and validated.

**Phase II comment:** It was stated that the stakeholder group was to be comprised of thirty (30) individuals by select invitation of the Director. ADEQ should clarify the makeup and process for selection of the individuals that will comprise the stakeholder group. Ideally, this group should be equally distributed among all valid stakeholders in order to provide balance to the decisions derived and recommendations from this group. Further, the process by which the group will operate, as well as meeting schedules, agendas, and materials used or developed by the group should be publically available. All meetings of the stakeholder group should be made open to the public.

Thank you again for the opportunity to provide comments, and I look forward to continued participation throughout this process.

If you have any questions, please don't hesitate to contact me.

Sincerely,



Paul R. Easley  
Director of Water Quality

CC: Robert Hart, Technical Services Officer  
Central Arkansas Water