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Arkansas Game and Fish Commission

November 13, 2017

Sarah Clem

Water Planning, Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Re: Public Comment Period on Draft 2018 Assessment Methodology

Ms. Clem,

Biologists with the Arkansas Game & Fish Commission (AGFC) have reviewed the public notice and participated in the stakeholder phase of this assessment methodology review. We appreciate being brought to the table to discuss changes and offer our input regarding the 2018 Assessment Methodology (AM). These meetings were very insightful, and we encourage ADEQ to continue the process of bringing in stakeholders for input for future updates to the AM, in addition to a public comment phase. Over the course of our meetings and discussions, many of our original questions regarding the proposed changes were answered. We do offer the following additional questions and comments.

1. Assessment Methodologies for site specific mineral quality. – I understand that there has been a switch to the binomial distribution method, but why was a 25% exceedance rate chosen? This would seemingly allow for the highest number of exceedances, compared to a more conservative 10% rate.
2. Biological Integrity – Our biologists encourage ADEQ to consider the recommendations from other sources besides Plafkin(1989) and examine any existing state and region specific guidance for future AM. Shackleford's 1988 paper that has been brought up several times over the course of the stakeholder discussions which specifically dealt with macroinvertebrates in Arkansas. Of note is the fact that he suggests non impairment is only a 10% deviation in the taxa richness biometric from an upstream reference reach, so 90% similarity or greater.

We appreciate the opportunity to participate in the stakeholder discussion, and look forward to this process continuing in the future. We hope ADEQ will continue to invite agency and industry feedback so that the natural

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The Arkansas Game and Fish Commission's mission is to conserve and enhance Arkansas's fish and wildlife and their habitats while promoting sustainable use, public understanding and support.

resources of our state can be wisely conserved and managed for future generations of Arkansans. Thank you for the opportunity to comment.

Justin Stroman

Justin Stroman
Environmental Coordination Biologist
Arkansas Game and Fish Commission

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