

October 31, 2016

Arkansas Department of Environmental Quality

Water Planning 5301 Northshore Drive North Little Rock, AR 72118

Sent via Electronic Mail to: am-comments@adeq.state.ar.us

Ms Barnet,

I wish to submit my comments for the 2018 Assessment Methodology.

In this video Dr Andrew Sharpely, University of Arkansas, BCRET Team leader states "we cannot expect cheap food and clean water at the same time". <https://youtu.be/0lvkRwXpZYY>

Dr. Sharpely studies water quality based on the phosphorus index. This visually isn't working for water quality in karst terrains such as the Buffalo River where water can flow underground for miles.

Does Arkansas wish to raise cheap food and sacrifice clean water by the permitting of water polluting industries in its watersheds. The photo below taken from a 11.5 mile stretch of the Buffalo River September 15, 2016 shows a visual of nitrogen and phosphorus consuming algae in the Buffalo River.



Reg. 2.402 Nuisance Species states All waters shall be free from substances attributed to man-caused point or nonpoint source discharges in concentrations that produce undesirable aquatic biota or result in the dominance of nuisance species.

We have a uniqueness in the NW area of Arkansas and it needs special protection due to karst environments that do not filter waters like other terrains. This should be considered in the methodology assessment. The Buffalo River like other streams in karst terrain have multiple sources of water. Until streams and lakes are thoroughly studied for their sources careful consideration should be made to the highest standards of collection and analysis of water data adding TMDL's as important scientific criteria.

To remove the language (subsurface) weakens the 2018 assessment of the states waters. As in the 2014 Assessment Methodology "Among the numerous activities is the management of the State Water Quality Monitoring Networks for both **surface and subsurface waters**. Other activities include routine monitoring and intensive, special investigations of the physical, chemical, and biological characteristics of waterbodies and/or aquifers". I suggest it remain. I have been in many underground streams while caving, I am not sure they fit the aquifer definition but would like to know is Blanchard Springs Caverns stream an aquifer or underground stream? An aquifer is described in the dictionary as a container of water. (I didn't see definitions to get a clear picture of explanations).

Arkansas has exceptionally beautiful landscapes that are enjoyed by all lets improve our streams and waters to exceptional health so that all can enjoy the streams and lakes that we love to fish and re-create within their boundaries, The criteria to protect our waters should be equally or as stringent as the EPA's.

I have received many FOIA documents about the assessment methodology and even though there are regulations and criteria, the standards are set to low. The ADEQ staff or director determines what is put on the 303 d list and even though a stream fits the criteria for impairment ADEQ does not include them choosing to make alterations and forfeit water quality for whims. Therefore it makes it difficult for the general public to understand the assessment methodology or the Regulations.

I would like to think my comments make a difference and the time used to generate information is utilized. Please place the highest standards on this endeavor and lets show the other 49 states Arkansas is on the forefront of environmental protection.

Sincerely,
Carol Bitting
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