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March 16, 2016

Mr. Jim Wise  
Arkansas Department of Environmental Quality  
Water Division  
5301 Northshore Drive  
North Little Rock, AR 72118

RE: Proposed 2016 Impaired Waterbodies List (303(d) list)

Dear Mr. Wise:

The following comments are respectfully submitted on behalf of the Arkansas Public Policy Panel (APPP) in regard to the Arkansas Department of Environmental Quality (ADEQ) Proposed 2016 Impaired Waterbodies prepared pursuant to section 303(d) of the Clean Water Act (CWA)(hereinafter the “Proposed 2016 303(d) List”).

1. APPP request that the review process for the Proposed 2016 303(d) List be improved to provide the public with better access and ease when reviewing and submitting comments.
  - *Access to data:* APPP request that all of the data used to make determinations for the listing or delisting on the 303(d) list be posted on ADEQ’s webpage and be easily accessible.
  - *Access to email address to submit comments:* As APPP requested, ADEQ placed a link and deadline for comments in a more obvious location on the webpage than was originally posted. The ADEQ’s addition of this link and quick response is appreciated. APPP request ADEQ to embed the email address to submit comments into all web-based correspondences to provide greater ease for the public to comment.
  - *Webpage:* ADEQ’s webpage is difficult to navigate and could be improved to provide the public with easier access to information. There are numerous ways that would make the website more user friendly such as using tabs rather than having to scroll through text and clearly labeling the material that is open for comment.

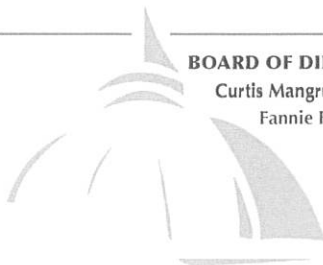
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- *Justification for delisting*: APPP request that ADEQ provide a brief justification for the proposed delisting of a stream segment or the removal of an individual water quality parameter along with the proposed 303(d) list. This was requested during the 2014 comment period. Here is an example from Oklahoma:  
[http://www.deq.state.ok.us/WQDnew/305b\\_303d/2012IRReport/2012%20Appendix%20OD%20-%20Delisting%20Justifications.pdf](http://www.deq.state.ok.us/WQDnew/305b_303d/2012IRReport/2012%20Appendix%20OD%20-%20Delisting%20Justifications.pdf)
  - *Water Quality Assessment Summary Table*: APPP request that water quality assessment summary table be included, similar to Oklahoma's  
[http://www.deq.state.ok.us/WQDNew/305b\\_303d/index.html](http://www.deq.state.ok.us/WQDNew/305b_303d/index.html)
2. The APPP requested JoAnn Burkholder, a specialist with more than 30 years of experience in water quality analysis and assessment to review and comment on the Proposed 2016 303(d) List. Dr. Burkholder's analysis and recommendations are attached. APPP fully supports Dr. Burkholder's comments.

Please contact me if you have any questions about these comments.

Sincerely,



Anna Weeks  
Environmental Policy Associate  
Arkansas Public Policy Panel  
1308 W. 2<sup>nd</sup> Street  
Little Rock, AR 72207

Attachments (2)

CC: Becky Keogh, [keogh@adeq.state.ar.us](mailto:keogh@adeq.state.ar.us)  
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