



Arkansas
Environmental
Federation

Industries for the Environment

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Secretary Becky Keogh
Department of Energy and the Environment
5301 Northshore Drive
North Little Rock, Arkansas 72118
waterbodycomments@adeq.state.ar.us

Delivered via electronic mail and U.S. Postal Services

RE: Comments on the Draft 2020 303(d) List

Dear Secretary Keogh:

Thank you for the opportunity to comment on the 2020 Draft 303(d) Impaired Waters List (303(d) List). The Arkansas Environmental Federation is grateful to the Department of Environmental Quality, Office of Water (DEQ), for responsiveness to our requests for information. We appreciate the Office of Water for the hard work that went into the development of the 303(d) List.

Our workgroup participants expressed difficulty in determining how DEQ made decisions of inclusion, removal, and priority of the waters listed on the 303(d) List. The efforts to review the material cannot be completed in the time frame restricted by the September 20, 2021, comment submittal deadline. However, the AEF does not make a request for an extension at this time. We reserve the right to join with members if problems with procedure arise.

More information is necessary to make a full and complete review of the 303(d) List. Sources of information, including special studies, source of data, and aggregate information are all necessary to fully understand the inclusion and removal of water bodies on the 303(d) List. It would also be helpful if a draft DEQ “integrated Report” prepared pursuant to Clean Water Act sections 305(b) and 303(d) be released at the initiation of the public comment period for the proposed 303(d) list. EPA has suggested this approach in the past and other states utilize it. We respectfully request this information on draft lists in the future.

Please consider this letter the Arkansas Environmental Federation’s official comments on the Draft 2020 303(d) List. We appreciate the opportunity.

Sincerely,

Ava F. Roberts
Executive Director
Arkansas Environmental Federation