



Arkansas Environmental Federation

Union Station

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March 10, 2017

Mr. Caleb Osborne
Associate Director – Water
ADEQ
5301 Northshore Drive
North Little Rock, AR 72118-5317

Ms. Sarah Clem
Branch Manager
ADEQ
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: Arkansas Department of Environmental Quality (ADEQ) 303d List Benthic Scoring System

Dear Mr. Osborne and Ms. Clem:

The Arkansas Environmental Federation (AEF) is submitting our comments on the use of the ADEQ Benthic Scoring System that is currently being used as part of the 303(d) assessment methodology. We have attached our original question to ADEQ, ADEQ's reply to the question, and our brief statement to the Assessment Methodology Stakeholder Workgroup at the last meeting.

Briefly, the AEF letter of October 24, 2016 provided comments on the assessment methodology process, in part requesting the rationale for the ADEQ's state specific methodology,

"We request that ADEQ provide the background and the technical documentation utilized in the development of this benthic scoring system. We also request a response as to why Arkansas elected to be more restrictive in their benthic analysis than EPA."

The ADEQ provided a response to the workgroup (attached) that replied in part to the AEF's questions,

"... ADEQ reviewed historical information for metric selection and deviation of revised percent comparable estimates. However, ADEQ was unable to recover any supporting documentation....."

The response further stated that ADEQ was allowed to have more stringent standards for water quality, the ADEQ methodology appeared to be more stringent, and would continue to be used in assessments.

The AEF strongly objects to the use of an undocumented methodology in assessing water quality or biological integrity, especially when a well-documented method such as EPA's Rapid Bioassessment III (Plafkin et al. 1989) is available.

The AEF further objects to the adoption of an undocumented assessment methodology simply because, according to the ADEQ response, the ADEQ believes, without documentation, that it may provide a more stringent level of protection. In our opinion, the rationale for adopting a different methodology for assessment versus the EPA approach should be that the new methodology has been rigorously tested, documented and has been shown through independent review and public input that it is more accurately representative of, and relevant to, Arkansas water quality ranges and matrices as well as biological communities than the EPA methodology.

We respectfully request that the ADEQ only use methodologies that have been reviewed and documented for assessments of water quality and/or aquatic life protection. As always, we thank the ADEQ for including the AEF in the stakeholder process to work through the complicated process of protecting the state's water resources.

Respectfully submitted.

Charles M. Miller
Executive Director

Cc: Dr. Bob Blanz