

ARKANSAS CHAPTER AMERICAN FISHERIES SOCIETY

P.O. Box 1270
Hot Springs, AR 71902
(501) 321-5202
December 2, 2002

Dear Governor Huckabee,

In representation of approximately 125 professional fisheries biologists, the Arkansas Chapter of the American Fisheries Society (AR AFS) applauds the Arkansas Department of Pollution Control and Ecology Commission (ADPC&E) for their farsightedness in designating some of Arkansas' most unique streams as Extraordinary Resources Waters (ERW). Without the conservation measures implemented under Regulation #2 some thirty+ years ago, we feel certain that the designated ERW would look much worse today. For example, gravel mining on the Kings River had caused much aquatic habitat loss and siltation in that stream. Since ERW status has been given to the river, siltation has decreased significantly; the riparian zones and subsequent woody debris is reestablishing within the river. What a turnaround!

The ERW management provisions (Section 2.304) have far-reaching ramifications even into federal programs. For example, the Ozark and Ouachita National Forests are beginning the revision of their ten-year management plans. Stream protective measures in Regulation #2, support and justify management recommendations for streamside management zones, and keeping roads/trails out of stream courses within public federal lands. The public certainly does not accept degradation of streams within the national forest system, and should not have to from their neighbors on privately owned lands.

The AR AFS encourages ADEQ to not only strengthen the present regulations by adding the "ERW watershed" to the conservation management guides of Regulation #2, but to also add other streams that qualify as ERW (such as Crooked Creek) because of the combination of chemical, physical, and biological characteristics of the stream, and because of scenic beauty, aesthetics, scientific values, broad scope recreation potential, and intangible social values. As we are learning from our past mistakes (Florida, Great Lakes, etc.), **prevention of** environmental degradation is much easier and considerable less costly than **restoration from** environmental degradation.

Extra protection for the most unique streams and other water bodies within "The Natural State" is justifiable for scientific, ecological, and economic reasons. For example, many of our ERW streams are home to endemic (found only within a relatively small area) species of fish, mussels, and other aquatic organisms. Consider these fish species: the yoke darter is found only within the White River drainage, the yellowcheek darter occurs only within the Little Red River drainage, and even the paleback darter is found to occur primarily within the upper Caddo River. Many of our ERW streams provide economic benefits to canoe outfitters, motel operators, gas/grocery store and restaurant owners, and others that cater to tourists and locals using these streams for recreation because of their unique features that result in large part from protection of their integrity.

The AR AFS supports the contention to keep the strengths of the ERW regulations as their effectiveness has been proven. Thank you for your attention and consideration in this matter. We would like to be added to the scoping/information mailing list for notices of ADEQ public meetings, particularly regarding ERW and Regulation #2, as well as any other conservation issues.

Sincerely,

/s/ Betty G. Crump

Betty G. Crump
AR AFS President

cc: Bill Keith, Chuck Bennett, Marcus Devine, Bootsie Ackerman, Grant Black, Hugh Durham, Jerry Hill, John Shannon, William Thompson, Randy Young, Thomas Schueck, Bill Bush, David Featherstone, Randall Mathis, Lynn Sickel, Sanford Varnell, Terry Horton