

From: [Bob Allen](#)
To: [ImpairedWaterbodies_Comments](#)
Cc: michael.lamoureux@governor.arkansas.gov; Kane.Webb@arkansas.gov; Keogh.Becky@epa.gov; burrell.monica@epa.gov; Kaspar.paul@epa.gov; Hunt.laura@epa.gov; Hodgkiss.miranda@epa.gov
Subject: request for inclusion of additional streams
Date: Tuesday, March 15, 2016 10:12:32 AM
Attachments: [303_sierra_club.doc](#)

The Sierra Club respectfully requests that Mill Creek, Big Creek, and Bear Creek be added to the list of imparired streams, 303(d) list. See attached documentation

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Bob Allen, Professor of Chemistry  
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Bob of the Ozarks:
<http://ozarker.org>
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Science is what we have learned about how to keep  
from fooling ourselves — Richard Feynman  
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March 15, 2016

Mr Jim Wise
Water Division Arkansas
Department of Environmental Quality 5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

Dear Mr Wise,

The Arkansas chapter of the Sierra Club has over 3,000 members. Nationally the Sierra Club represents over 2.4 million members and supporters. The motto of the club is to “Explore, Enjoy and Protect.” I write to express our concern for the failure of the ADEQ to include three tributaries of the Buffalo National River on the 303(d) list of impaired waters.

The National Park Service is charged with protecting the river. Additionally the ADEQ has role as the river is an Arkansas Extraordinary Resource Water (ERW). The reach of the Park Service doesn't extend beyond the borders of the Park, but the threat to the water quality extends to the boundaries of the watershed.

The Park Service has asked for inclusion of three tributaries of the Buffalo to be included in the 303(d) list: Mill Creek, Big Creek in the upper Buffalo, and Bear Creek. It seems only reasonable, given that even though these three streams are not themselves ERWs, they are part of the watershed of an ERW. They should therefore receive the same attention for the sake of preservation of the ERW.

Mill Creek has been a festering wound on the Buffalo for a number of years because of elevated E. coli which pollute the buffalo. Big Creek is currently stressed from the siting of a 6,500 hog factory. Real time data from a USGS gauge on Big Creek near the confluence clearly show decreased dissolved Oxygen, and elevated total Nitrogen loads which over time will degrade water quality in the nation's first National River. Bear Creek is already listed as impaired due to excessive Total Dissolved Solids (TDS), but the Park Service has asked for additional inclusion due to low DO.

The Buffalo National River is visited by millions of tourists throughout the year, not just from Arkansas but nationally and even internationally. Over 50 million dollars of annual income is generated from this tourism. It is essential to Newton, Searcy, and surrounding counties with a rather limited income base.

It is time for Arkansans to take seriously our role as the protector of this icon of “The Natural State” and the Nation's first National River. The Arkansas Chapter of the Sierra Club, in our effort to protect the wild places within our borders, ask that you reconsider and add Mill Creek, Big Creek, and Bear Creek to the impaired streams list so they may receive special scrutiny. We can only protect the Buffalo National River by protecting its watershed, rather than the small area with the park boundary.

Thank You,

Bob Allen, co-chair for Conservation
Arkansas Chapter, Sierra Club

cc:

Michael Lamoureux, Chief of Staff to Governor Hutchinson.
michael.lamoureux@governor.arkansas.gov

Kane Webb, Director, Arkansas Department of Parks and Tourism.
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Becky Keogh
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Paul Kaspar
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Laura Hunt
Hunt.laura@epa.gov

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Hodgkiss.miranda@epa.gov

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Subject: Inclusion of three additional streams on the impaired streams list.
Date: Tuesday, March 15, 2016 10:23:25 AM
Attachments: [303_acc.doc](#)

The Arkansas Canoe Club respectfully requests that Mill Creek, Big Creek, and Bear Creek be added to the impaired streams list. See attached for documentation

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Dear Mr Wise,

The Arkansas Canoe Club has over a 1,000 members and supporters. In addition to those here in the state we also have chapters in Oklahoma, Texas, and Louisiana. We are dedicated to participating in and promoting the sport of paddling by holding paddling schools and clinics, whitewater rescue courses, river cleanups and being active in conservation and river access issues. I write to express our concern for the failure of the ADEQ to include three tributaries of the Buffalo National River on the 303(d) list of impaired waters.

The National Park Service is charged with protecting the river. Additionally the ADEQ has role as the river is an Arkansas Extraordinary Resource Water (ERW). The reach of the Park Service doesn't extend beyond the borders of the Park, but the threat to the water quality extends to the boundaries of the watershed.

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Thank You,

Bob Allen, co-chair for Conservation
Arkansas Canoe Club

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