

**From:** Bob Allen <bob@ozarker.org>  
**Sent:** Monday, September 10, 2018 4:05 PM  
**To:** WaterbodyComments  
**Subject:** Buffalo 303d

The Arkansas Chapter of the Sierra Club has over 3000 active members from all corners of the state of Arkansas. We are dedicated to “Explore, enjoy and protect the planet.”

I am writing on behalf of the Sierra Club, Arkansas Chapter to express our concern over the long overdue addition of part of the Buffalo National River (BNR) and a section the adjacent Big Creek to the 303d list of impaired waters. The BNR is simultaneously an Extraordinary Resource Water, a Wild and Scenic River and an Outstanding National Resource Water. The BNR lies totally within the State of Arkansas and is therefore the responsibility of the ADEQ to protect this valuable riparian environment not just for Arkansans, but for the nation.

The proposal to address the impairment as a category 4b requires only voluntary measures and we feel this is insufficient to address the problem. The Beautiful Buffalo River Action Committee (BBRAC) has been created for the purpose of addressing potential water-quality concerns via the initiation of the Buffalo River Watershed Management Plan (BRWMP). This is certainly a step in the right direction and the plan should go forth regardless, but to see this solution as the the solution according to category 4b is insufficient to protect the long term needs of the watershed.

What are needed are stronger, more stringent, enforceable water quality standards that can come about by inclusion in category 5. We recommend several steps to remediate the impaired status of these stream segments, and to create long term standards which will portect the BNR.

1. The temporary ban on additional medium to large CAFOs in the watershed should be made permanent.
2. Voluntary actions following the BBRWP plan should be pursued immediately as stop gap measures.
3. BNR should be included in category 5 as the only long term enforceable protection for this national treasure.

The BNR has entrusted to the people of Arkansas for protection from water-quality degradation and so far we have failed. It is time to correct this wrong. To do anything less deprives curent and more importantly future generations the protective steps which must be undertaken now.

Bob Allen, member, Executive Committee,

Arkansas Chapter of the Sierra Club.

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Bob Allen, Emeritus 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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