

September 10, 2018

Director Keogh, Sarah Clem, Caleb Osborne and Others:

I am concerned about the placement of a part of the Buffalo National River and one of its tributaries, Big Creek in the category 4b for the 303(d) list. Category 5 seems more appropriate in that it will be necessary to determine the reason for the impairment in a timely manner and promptly find a solution before more of the Buffalo National River is endangered. The current situation of impairment also needs to be addressed immediately. The Buffalo River is the crown jewel of Arkansas. All efforts to address this problem need to be maximized.

I am concerned that leaving this problem situation up to “voluntary” measures such as the Buffalo River Watershed Management Plan, will be too little and too late. The plan is lacking in its ability to investigate and remediate the impairment of these waters: the voluntary watershed management plan does not include point sources, there is not an effort to monitor both groundwater and surface water flow with their interaction in karst hydrogeology as found in the Buffalo River watershed and voluntary actions will not be enough to address this problem.

ADEQ needs to fulfill its mission statement and protect the waters of the state. Under category 5 ADEQ has an opportunity to investigate and remediate the impairment of these waters. We have had a Beautiful Buffalo River Committee, a Big Creek Research Team, and a Buffalo River Watershed Management Plan and yet, the Buffalo National River now has parts that are impaired. Clearly, voluntary efforts have not and will not be enough to protect the Nation’s First Scenic River. Please place these sections of the Buffalo National River and Big Creek in Category 5.

Sincerely,

Ellen Corley  
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