

**From:** [faron davidson](#)  
**To:** [WaterbodyComments](#)  
**Subject:** Arkansas 2018 Draft 303(d) impaired waters list  
**Date:** Wednesday, August 22, 2018 12:12:07 PM

---

ADEQ's decision to remove tributaries of the Illinois River from Category 5 is not based on water quality data or sound science. Basing your decision on a watershed management plan or other well-intended best management practices is a flawed decision. Category 5 is the correct category for Osage Creek and Spring Creek which receive a large loading of phosphorus and nitrates in treated sewage from Rogers, Springdale, and Bentonville, Arkansas as well as from nonpoint sources of pollution. The watershed management plan for the Illinois River watershed is non-regulatory and unenforceable. It is not capable of providing the water quality protection that a TMDL will provide. Nor is it capable of protecting the Illinois River watershed in a timely manner.

Additionally, Arkansas agreed to abide by the Oklahoma Scenic Rivers Joint Study by Baylor University. Placing Osage Creek, Spring Creek, and other Illinois River water bodies in a category other than Category 5 is not in the spirit of the study results that Arkansas agreed to abide by. Please list Osage Creek, Spring Creek, and other Illinois River watershed streams segments in Category 5 and give the Illinois River greater protection not less protection.

Sincerely,

Faron Davidson

25151 HWY 82

Park Hill, OK 74451