

Fay Knox
HC62 Box 692
Deer, AR 72628

September 8, 2018

Proposed 2018 Impaired Waterbodies List
ADEQ Headquarters
5301 Northshore Drive
North Little Rock, AR

Dear AEDQ,

I am writing in regards to proposed revisions to the 2018 list Arkansas Integrated Water Quality Monitoring and Assessment Report that will be approved by the ADEQ Director and the Region 6 Office of the U.S. EPA.

The Buffalo National River and its tributary Big Creek are impaired. In order to remedy the degradation in the most effective and efficient manner possible it is imperative that they be placed on category 5 list not the 4d list. Category 5 insures that priority investigation, monitoring and direct remedy are done in an expedient manner. Setting Total Maximum Daily Loads on these current impairments is of the upmost importance to meet the EPA clean water standards while insuring that the nation's first National River will receive the protection needed to insure clean water.

Best Management Plans must be required. There is much documented evidence and multiple requests made by the Buffalo River Watershed Alliance and concerned citizens at public forums to name Big Creek as a priority stream, yet the Buffalo River Watershed Management Plan created by Beautiful Buffalo River Action Committee refused to do so.

It is hard to fathom how the impaired Big Creek was not part of the six streams prioritized to implement Best Management Practices. It is impossible to believe that as a 303d Category 4b financial incentives will be available for Big Creek sub watershed landowners.

The elephant in the room of the Buffalo River Watershed Management Plan is the negligence in addressing the C&H hog farm, a confined animal feeding operation whose waste has been proven to be a very significant source of the impairment. Adopting best management practices needs to be an enforceable action verified by Total Maximum Daily Loads, and under the Buffalo River Watershed Management Plan in Category 4b they would be.

This issue has grown to be acute as excessive phosphorus continues to be applied in watershed fields causing nutrients and pathogens to be at levels that are unacceptable. Fish and aquatic species are comprised by years of phosphorus that have been applied causing exponential growth of algae in the Buffalo National River. This summer 70 mile stretches of algae have replaced the 20 mile stretch seen only two years ago. With a widening river, shallower water, higher summer temperatures, and high sedimentation from new pastures, logging endeavors and a confined animal feeding operation impairment is increasing ever so rapidly.

We are seeing exponential growth of algal masses in the mainstream of the Buffalo. 20 mile stretches of two years ago have increased to stretches that are 70 miles long in 2018 summer. This is not accidental or unforeseen. Science tells us that the river is wider, more shallower and has increased sedimentation from new pastures, logging, and excessive raw animal waste.

For the sake of our nation's first National River it is essential that AEDQ change the status of if Creek to Category 5. Please do the right thing to protect this national treasure.

Sincerely,

Fay Knox