

From: [James Brandenburg](#)
To: [WaterbodyComments](#)
Subject: Proposed 2018 Impaired Waterbody List--Buffalo River, Big Creek
Date: Friday, September 7, 2018 3:24:31 PM

Director Keogh,

I submit these comments with regard to the proposal to place segments of Big Creek (AR 1101003 022, AR 1101003 020) and segments of Buffalo River (AR 11010005 011, AR 11010005 010) in Category 4b.

I live in Bentonville and use the White River regularly for recreation, along with that my family also enjoys the Buffalo River once or twice per year. I find the rapid growth of algal masses in the lower half of the Buffalo National River and Big Creek to be unacceptable. It has restricted the floating and fishing in the river by making it difficult to paddle in heavily affected waters. I am aware that fishing guides have recently reported diminishing fish populations here. I have also learned that severe waterborne illnesses affecting people exposed to the Buffalo River waters have been reported. The Arkansas Department of Health has issued written warnings to the general public and regional veterinarians of the exposure of pets and humans to cyanotoxins and other pathogens found in the Buffalo river waters. The algal blooms are now extending to the mouth of the Buffalo River.

The algal problem has advanced rapidly in the past three years. At the current rate of water quality degradation, the health risks to the public and wildlife will continue to escalate. The economic vitality of the Buffalo River watershed is now at risk.

How many jobs are directly related to recreation within this watershed? How much economic activity is dependent upon its quality? How can we allow one single source of pollution to negatively impact so many other interests?

I request of the ADEQ decisive, timely and enforceable action to determine the primary direct hydrologic sources of nutrient loading and of the pathogens that have impaired the Buffalo River and Big Creek. Placing the waters in Category 4b of impairment is wholly inadequate for these Extraordinary Resource Waters. While a watershed management plan is needed to add consideration for long term planning for best management practices, depending on a non-regulatory, voluntary watershed management plan that excludes permitted facilities and refuses to acknowledge the impairment of Big Creek will only allow the problem to worsen quickly. I recommend designating these stream segments in Category 5 impairment, a status that would allow for a greater level of source tracking and establishment of enforceable pollution limits through a TMDL.

The TMDL, even if completed in the near future and done correctly, is not the end. According to the EPA Clean Water Act Section 3(d) website, "A TMDL establishes the maximum amount of pollutant allowed in a waterbody and serves as the starting point for restoring water quality." As Category 5, a TMDL for these waters should be given highest priority in consideration of the extent of use by the public and the importance to the recreation industry of Arkansas.

Former Congressman Ed Bethune recently addressed the Arkansas Pollution Control and Ecology Commission and the ADEQ, stating eloquently that “If anything happens to the Buffalo River, it will be a disgrace not only to this state, but it will be a disgrace to the nation and to the world, and it would happen on your watch.”

Please act quickly to save these waterways for my children and grandchildren.

Thank you for your consideration.

Sincerely,

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