

**From:** [James Morrow](#)  
**To:** [WaterbodyComments](#)  
**Subject:** Illinois River  
**Date:** Wednesday, August 22, 2018 9:02:11 PM

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Arkansas Department of Environmental Quality  
Office of Water Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

Re: Arkansas 2018 Draft 303(d) impaired waters list

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 including sewage from Rogers, Springdale, Fayetteville, Siloam Springs and Bentonville, Arkansas as well as from nonpoint sources of phosphorus including legacy phosphorus.

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 under Category 5 of your 2018 303(d) list. 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. The Baylor study of nuisance algae determined that nuisance algae begin to grow at a level of point-zero-35 mg/L (.035 mg/L) and below. ADEQ has shown no evidence that the level of total phosphorus in these streams and stream segments is below .035 mg/L or below Oklahoma's instream phosphorus limit of .037 mg/L total phosphorus.

Please list Osage Creek, Spring Creek and other Illinois River stream segments in Category 5. Give the Illinois River greater protection not less protection.

Sincerely,

James K. Morrow  
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Stilwell, OK 74960