From: Linda Simmerman

To: WaterbodyComments

Subject: Please save the Buffalo River

Date: Monday, September 10, 2018 7:56:45 AM

Please, include Big Creek and the impaired sections of Buffalo River in Category 5.

Two segments of Big Creek and two segments of Buffalo River are listed as Category 4b. This is wrong and needs to be corrected. Designation as 4b and not 5 on the Draft 2018 Impaired Waterbodies list allows for alternative, voluntary water management plans (like the Buffalo River Watershed Management Plan) to be used as state-led management approaches. The department identifies the the Buffalo River management plan as the "alternative plan in place" to justify the inclusion of the impaired segments in Category 4b. This approach fails to protect Big Creek because it lacks consideration of point-source and permitted facilities like the C&H Hog Farm.

C&H is expressly excluded from regulation in Category 4b. The waste from thousands of hogs at C&H is spread on farm lands adjacent to Big Creek, leading to nutrient loading, including phosphorous, which is contributing to pollution and algae build-up in Big Creek. Big Creek is a tributary of Buffalo River.

In the Buffalo River watershed, four problem areas were identified as impaired, including three for bacteria and one for dissolved oxygen. Of the assessment areas with bacterial problems, two exceeded federal limits for E coli. Inclusion as Category 4b means the state is not required to develop "total maximum daily loads." Simply put, that is the maximum amount of a specific pollutant allowed to enter a water body.

Development of total maximum daily loads helps target how much of a reduction is needed to declare the water fit for designated uses like recreation. That seems like an important piece of information, particularly for the Buffalo, which draws people from all over the country for swimming, fishing and paddling.

Thank you for your service. A concerned Arkansan



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