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September 6, 2018

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

[WaterbodyComments@adeq.state.ar.us](mailto:WaterbodyComments@adeq.state.ar.us)

Re: Proposed 2018 Impaired Waterbody List  
Comments by Friends of the North Fork and White Rivers

Director Keogh,

Friends of the North Fork and White Rivers (FNFWR) submits 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.

Members of FNFWR live and recreate in the middle White River watershed which includes the Buffalo River watershed. We 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. Fishing guides have recently reported diminishing fish populations here. 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.

We 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. We do 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. "

Thank you for your consideration.

Sincerely,

*Steve Blumreich*

President

Friends of the North Fork and White Rivers

*Friends of the North Fork and White Rivers is an Arkansas 501(c)(3) non-profit organization devoted to creating an ongoing dialogue where individuals, groups, and government agencies can work together to conserve, restore and enhance these beautiful rivers.*