

**From:** [bill@williamdark.com](mailto:bill@williamdark.com)  
**To:** [WaterbodyComments](#)  
**Subject:** Draft 2018 Impaired Waterbodies - 303(d) List  
**Date:** Monday, September 10, 2018 7:08:43 AM

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To whom it may concern, Good Morning:

Thank you for the opportunity to comment on Arkansas's Draft 2018 List of Impaired Waterbodies. I appreciate the considerable time and effort that ADEQ has taken to prepare the list, but I do have concerns about the focused initiatives in the Buffalo River watershed.

In my opinion, the classification of the four assessment units that have been identified as impaired and placed in category 4b should be reconsidered and designated as category 5 streams. As stated in the Executive Summary, the department expects the voluntary environmental program described in the Buffalo River Watershed Management Plan to result in the attainment of target water quality standards. Unfortunately, evidence has shown that voluntary compliance in environmental programs has been little more than wishful thinking (*Voluntary Environmental Programs: A Policy Perspective*, edited by Peter deLeon, Jorge E. Rivera, 2010). Furthermore, I do not support the use of taxpayer money through EQIP payments to sustain an industry that should be more environmentally responsible in their management practices by utilizing their own financial resources. Additionally, landowners must apply for inclusion in the program, so there is no guarantee that any of the applications from stakeholders within the Buffalo River watershed will be accepted by USDA. With an estimated cost of over 24.6 million dollars, it is doubtful that any meaningful progress will be made toward achieving the desired targets for water quality standards in the Buffalo River Watershed in the foreseeable future. There are simply no incentives in place for voluntary participation. Considering the accelerated and extensive growth of algal blooms, and recent appearance of toxin-producing cyanobacteria, I believe a better plan would be to designate the impaired tributary streams within the Buffalo River Watershed as category 5 until such time that the financial resources are secured to support an effective management plan.

Thank you for your time and consideration.

Sincerely,  
William Dark