

**From:** [Lin Wellford](#)  
**To:** [am-comments](#)  
**Subject:** Comments on Water Quality Assessment Methodology  
**Date:** Saturday, November 11, 2017 11:34:08 PM

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Hello-

Thank you for the opportunity to make comments on the manner in which ADEQ makes its determination of whether or not Arkansas waterways are meeting their designated uses. My observations are based on serving for more than 10 years on the Kings River Watershed Partnership board, attending the Arkansas Watershed Stewards workshop, and spending countless hours on Arkansas rivers, including the Kings River, Osage Creek, the Mulberry and the Buffalo River over the past 40 years and intensively over the past 15 years.

My observation is that the controls in place are not stringent enough to protect water quality standards as specified for designated use. This is especially evident in the Buffalo River, where concentrations of algae have increased markedly in the past several years.

In Carroll County, which is designated a nutrient management area, water quality in the Kings River has improved, at least aesthetically, despite the fact that this county has numerous poultry operations, receives effluent from the Berryville water treatment plant, and that a large part of Eureka Springs parking lots, highways and development are within the watershed.

Under the current Reg. 2 guidelines, under section 6.9 Nutrients, it states:  
A. Materials stimulating algal growth shall not be present in concentrations sufficient to cause objectionable algal densities or impair any designated use.

The past two years, algae blooms have appeared in mid-summer and persisted through late fall, sometimes only disappearing after a heavy rain cause enough flow to flush the growth downstream. Swimming is a designated use for the Buffalo River, but who wants to swim in water that has turned bright green and is full of wispy filaments that get caught in your hair and cling to your skin? There were areas below Gilbert where we could collect armloads of green gunk and pile it up on our boats.

Last year, there were times when the rocks at the bottom of the river were completely covered with long green ropes of algae and thick mats collected along the shore. I have photos taken from 2016 and this year I would be happy to share. One week after seeing the worst algae I'd ever encountered on the Buffalo, I camped on the Kings River, which was almost completely lacking any sign of algae. Same weather, same temps, same region.

I understand that algae is not only objectionable to swim in and look at and try to paddle through, but that these rampant outbreaks can suck the oxygen out of the water, impacting the creatures that depend on healthy water to survive.

While I can't say why the Buffalo River is losing its water quality, it is obvious to anyone who spends time on the river year round that things are not right. I'm sure it is a combination of sources, but having tons of hog waste added to the watershed certainly was a move in the wrong direction.

Sincerely,

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