

August 17, 2018

ADEQ

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Ms. Becky Keogh, Director:

The following comments are presented by me as President of Friends of the North Fork and White Rivers (FNWR) and as a member of North Arkansas Fly Fishers and Arkansas White River Chapter of Trout Unlimited. Our members include hundreds of fisher persons, guides, hikers, floaters, concerned citizens and voters who are extremely troubled about the ever increasing pollution in and degradation of the Buffalo River.

Based on first hand observations by our members algal blooms are becoming more dense, lasting longer and extending further down river each year. Numerous recent photos, date stamped and including GPS locations, document the extent of recent algal blooms and current conditions of the river. We are seeing exponential growth of algal masses in the river. Twenty mile stretches occurring two years ago have increased to seventy miles this summer.

Guide Gabe Levin stays off the Buffalo River beginning in June because of the algal blooms. "The Buffalo River which was once a pristine river with a healthy small mouth bass population is being decimated by the algal blooms which destroy the aquatic life in the river and make the river unfishable from late spring to winter".

Duane Hada, guide, artist and naturalist who grew up in the Buffalo River Watershed floated from Gilbert to South Maumee Monday and Tuesday, August 13 and 14 and stated, "I'm blessed to have lived near the Buffalo River and have always kept an observant eye over my lifetime of enjoying this beautiful National gem. I have concerns that the water quality is changing at an increasing rate. The algae blooms are much more frequent and widespread. The beautiful gravel beds and clear shoals are becoming layered in slime moss and decaying algae. I've noticed even the turtles shells are covered in fuzz. I rarely see live mussels in the streambed, hellgrammites and even crayfish are becoming rare in some stretches. I don't see the abundant aquatic life clinging to rocks as I once did, only clumps of decaying algae and sludge and slime moss. I consider the smallmouth bass to be an indicator symbol of wild free flowing Ozark streams. These fish are indigenous to the Buffalo River. They require clean, healthy water and clear gravel to spawn on. The problems I see happening on the Buffalo River have taken a toll on several famous smallmouth rivers of the Northeast. We must get a handle on controlling the amounts of pollutants into the Buffalo or we will be next on the list of streams that have fallen into the "once was" category - It's far too special to take anything but immediate action to keep this river in the best shape we can! For a Healthy River For All!"

We strongly recommend that the sections of Buffalo National River and its tributary, Middle Big Creek (MBC), currently being proposed as "impaired" be classified as category 5, not 4b. Category 5 will allow for priority investigation, monitoring and direct remedy. Since category 5 sets TMDLs (Total Maximum Daily Loads) on impairments, addressing these waterbodies in category 5

ensures Arkansas will be able to meet the goals for clean water set by the EPA and expected by the citizens of Arkansas.

Listing these waterbodies as category 4b would mean voluntary Best Management Plans (BMPs) be encouraged, but not required. Governor Hutchinson's Beautiful Buffalo River Action Committee (BBRAC) through its Buffalo River Watershed Management Plan (BRWMP) failed to identify MBC as one of the priority streams that the plan would address, in spite of repeated requests and evidence provided by FNWR, Buffalo River Watershed Alliance, White River Waterkeeper and other groups and concerned individuals during their public meetings. The BRWMP excluded MBC from the six streams prioritized for implementation of BMPs, making it very unlikely that financial incentives will be provided for landowners in the MBC sub-watershed. Plus, the BRWMP specifically does NOT address permitted facilities such as the confined animal feeding (CAFO) facility in the MBC watershed. The CAFO is most likely the major contributor to MBC impairment. According to the CAFO's annual ADEQ report approximately 3,000,000 gallons of liquid hog waste is sprayed each year in the MBC watershed. Adopting BMPs under the BRWMP is strictly voluntary and non-enforceable. Only by classifying MBC as Category 5 can the impairment sources be confirmed through total maximum daily loads (TMDLs) and properly and promptly corrected through enforcement action if necessary which are not possible under Category 4b.

Without a category 5 classification and action by ADEQ, this issue will only get worse. The excessive phosphorus being routinely applied to fields in the watershed combined with the associated pathogens have reached unacceptable and dangerous levels. The amounts are too much for the

pasture grasses to absorb and the excess washes into surface water through runoff and seeps into groundwater springs that supply our streams. This results in erratic levels of dissolved oxygen harming the lives of freshwater fish and aquatic species up and down the food chain as well as pathogens which currently pose a health risk to humans and some animals.

Our members who earn their living guiding have been forced to stay off the Buffalo River for longer periods of time because of the algal blooms and unhealthy water. More and more of the public will learn of the health concerns associated with the water and will choose not come to the Buffalo River, decreasing the economic benefits the river and Buffalo National Park contribute to the state of Arkansas.

If the pollution continues to worsen and expands to the White River, there will be an even greater disastrous environmental and economic impact to our members and to the State of Arkansas.

Please protect the Buffalo River and the White River by classifying the MBC and the section of the Buffalo River as 303(d) category 5.

Sincerely,

*Steve Blumreich*, President

Friends of the North Fork and White Rivers

Mountain Home, Arkansas

*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.*