

Buffalo River Watershed Alliance  
P.O. Box 101  
Jasper, AR 72641  
June 2, 2017

The following comments pertain to a permit application by the Marble Falls Sewer Improvement District permit AR 00340-AFIN 51-00011.

It is the position of the Buffalo River Watershed Alliance (BRWA) that this permit should be denied for the following reasons:

Comment 1. The permit should be denied because data collected over a number of years have indicated that Mill Creek should be on the 303d list and the principle reason for this impairment is due to discharges, including numerous permit violations, by the Marble Falls Sewer District.

In the Statement of Basis item 7 of ADEQ draft approval of the permit it is stated that Mill Creek is not on the 303d list. Since the 303d list has not been approved since 2008, this statement seems to be of limited value. This is especially true given the fact that the National Park Service and other NGOs have requested that Mill Creek be 303d listed.

Comment 2. At least two factors argue for heightened care in granting this permit. The first argument relates to the history of poor management of this facility. Second, the facility is situated on karst topography and is near the Buffalo National River. The lack of dye tracing information means that ADEQ has no information about what is really going on before wastewater reaches the treatment facility. Why is ADEQ ignoring the multiple violations without doing further investigation? Shouldn't dye tracing be completed before this permit is granted so that the agency is not blindly approving the permit?

Comment 3. The Hutchinson Administration has established the Beautiful Buffalo River Action Committee (BBRAC) charged with identifying and offering possible solutions to resolve problem streams in the Buffalo River Watershed. Surely, rather than granting a permit it would be preferable to request that BBRAC identify Mill Creek as a threat to the watershed. This might allow for funding to remedy the problem facility known as Marble Falls Sewer Improvement District.

These comments are submitted on behalf of the Buffalo River Watershed ALLIANCE and also incorporates by reference comments of the National Park Service and the White River Waterkeepers and any other person or entity who opposes the proposed Marble Falls Sewer Improvement District permit AR0034088-AFIN 51-00011.

Jack Stewart, Vice President BRWA