



MAR 04 2011

Illinois River Watershed Partnership
P.O. Box 8506
Fayetteville, AR 72703
www.IRWP.org

February 28, 2011

Ms. Claudia Hosch, Associate Director
U.S. Environmental Protection Agency Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

Re: Water Quality Modeling for the Illinois River TDML in Arkansas and Oklahoma

Dear Ms. Hosch:

Over the last several years, the Illinois River Watershed Partnership has worked diligently to improve the water quality in the Illinois River along with cities and property owners in the Basin. Improvements have been made and will continue to be made to minimize excess nutrients from point source effluents and non-point sources along with stream bank erosion.

Representatives from our Partnership have attended the public meetings sponsored by EPA Region 6, Dallas, Texas, at Fort Smith, Siloam Springs and Tahlequah concerning the modeling and TMDL development for the Illinois River Watershed. We strongly encourage that current data reflecting the improvements in water quality in the past 5 years be used along with adequate funding for Aqua Terra to produce a model that is a true reflection of existing water quality. The residents of Oklahoma, Arkansas, and the Cherokee Nation along with the EPA need to feel comfortable with the process and data used. Confidence in the results will be extremely valuable in crafting future watershed plans and developing implementation measures and projects.

As stated in the January 14, 2011 letter to you from the Arkansas Department of Environmental Quality (ADEQ): "**Limited time and resources must not impede the proper development, calibration, and validation of the HSPF model.** We ask EPA and Aqua Terra to review the existing schedule and budget to determine whether the proposed schedule and funding are adequate to accomplish the goals of the project - that is, to develop reliable hydrologic and water quality models for this extensive and complex hydrologic area, including a large reservoir. If schedule and budget are not adequate, we ask EPA and Aqua Terra to determine how much additional time and funding are required to adequately accomplish the project goals or how this project can be modified to ensure the proper development, calibration, and validation of the watershed model."

Thank you for your consideration.

Sincerely,

Dr. Delia Haak, Executive Director

cc: Teresa Marks, Director, ADEQ and Randy Young, Executive Director, ANRC