



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS TX 75202-2733

FEB 24 2012

Denise Deason-Toyne  
President  
Save the Illinois Rivers, Inc.  
24369 E 757 Rd.  
Tahlequah, OK 74464-1949

Dear Ms. Deason-Toyne:

Thank you for your letter, dated January 2, 2012, to the U.S. Environmental Protection Agency (EPA) Administrator Lisa P. Jackson regarding our ongoing efforts to develop a scientifically robust model for the Illinois River watershed in Arkansas and Oklahoma. Specifically, you requested a copy of our response to a letter, dated December 9, 2011, from several members of the Oklahoma and Arkansas congressional delegation to Administrator Jackson. You also encouraged the EPA to avoid any actions that might potentially delay and prolong our efforts. Because these issues concern the States of Arkansas and Oklahoma, which are within the jurisdiction of EPA's Region 6 office, I have been asked to respond to your concerns.

Per your request, I am pleased to share with you a copy of our response to the congressional delegation letter (enclosure 1). The degradation of the water quality of the Illinois River, its tributaries, and the waterbodies into which it flows, remains a critical concern to Arkansas, Oklahoma, Tribes, and the EPA. The EPA, with the support of Arkansas and Oklahoma, has been engaged in modeling efforts to better understand the relationships between sources of phosphorus and the water quality conditions in the watershed. This includes an assessment of the nonpoint sources in which you expressed an interest. The EPA will continue to collaborate with States, Tribes and other stakeholders to devise solutions resulting in the attainment of water quality goals in both states.

The EPA has taken the necessary steps to ensure that our Illinois River Watershed model is based on sound science. To date, we have committed necessary resources in order to document the validity of our model and ensure that it will reflect the best available information. By continuously involving States, Tribes, and other stakeholders, the EPA has prioritized the inclusion of all stakeholders at every decision point since the beginning of our model development process. In addition, by sharing project deliverables with interested stakeholders, the EPA has ensured that a thorough and rigorous review of our watershed modeling efforts has been carried out.

In your letter, you urge the EPA to be thorough in our consideration of all appropriate data and information for the study, while not unduly delaying completion of our vital work. We appreciate your concerns, and we remain fully committed to completing our model for the entire Illinois River Watershed (including Lake Tenkiller) as expeditiously as possible, without overlooking the importance of any stakeholder recommendations.

If you have further questions, please contact me at (214) 665-3187 or Ms. Claudia Hosch at (214) 665-6464.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "William K. Honker".

*for*

William K. Honker, P.E.  
Acting Director  
Water Quality Protection Division

Enclosure

FEB 16 2012

The Honorable Mark Pryor  
United States Senate  
Washington, D.C. 20510

Dear Senator Pryor:

Thank you for your December 9, 2011, letter to the U.S. Environmental Protection Agency (EPA) Administrator Lisa P. Jackson discussing your concerns related to the Illinois River Watershed in Arkansas and Oklahoma, and specifically the EPA's ongoing efforts to develop a scientifically robust model of the watershed. Because the states of Arkansas and Oklahoma are within the jurisdiction of Region 6, I have been asked to respond to your concerns.

The EPA is keenly aware of the significant investments made by communities in both Arkansas and Oklahoma to improve water quality in the Illinois River Watershed, including those associated with the Statement of Joint Principles and Actions signed by agencies in both states in 2002. The EPA is also aware that Oklahoma's applicable phosphorus criterion is currently under review by the state. While much has been accomplished with respect to limiting phosphorus loads from both point and nonpoint sources in the watershed, there remains an ongoing need for continued collaboration among stakeholders. The present and future quality of the Illinois River, its tributaries, and the waterbodies into which it flows are not only important shared priorities for Arkansas and Oklahoma, but for the EPA as well. As noted in your letter, with the support and input of both Arkansas and Oklahoma, the EPA has been engaged in developing a multi-jurisdictional watershed model to better understand the relationships between sources of phosphorus and water quality conditions in the Illinois River Watershed, and to assess potential phosphorus load reductions necessary to meet water quality goals in both states. The EPA appreciates your interest in ensuring that the model we ultimately produce is scientifically sound, and we are taking important steps to achieve that result.

The EPA has prioritized inclusion of substantial stakeholder involvement at every decision point in the project. Since the outset of our model development efforts, the EPA has actively and purposefully reached out to states, tribes, and other interested stakeholders in the watershed to ensure that our model reflects the best available scientific information. The EPA has maximized the transparency of our public participation process through a public website devoted to model development and has solicited public input via a Federal Register notice, newspaper notices, and numerous public meetings involving stakeholders representing a broad range of interests from both states.

To further ensure the scientific integrity of our watershed model, the EPA has built into the project schedule avenues for stakeholders to provide input. The EPA conducts monthly conference calls with state and tribal agencies, as well as informational public meetings throughout the watershed to provide project updates and solicit stakeholder input. To date, the EPA has convened public meetings in Ft. Smith, Siloam Springs, and Rogers, Arkansas, as well as one in Tahlequah, Oklahoma. Additional meetings will be held as the project progresses.

Throughout the model development process, the EPA is sharing project deliverables for review and comment by interested stakeholders. To date, such deliverables include the Project Quality Assurance Project Plan (QAPP), the Data Gap Analysis Report, the GIS Database, the Water Quality Model Recommendation Technical Memorandum and the Simulation Plan and Modeling QAPP. Interested parties have provided valuable feedback. The EPA will continue to ensure states, tribes, and stakeholders are a part of the process and will make future deliverables and the model available for review at key points in the project before the model is finalized.

As reflected by the steps already taken by the EPA to ensure a thorough and rigorous review of our watershed modeling efforts, the EPA is committed to ensuring the scientific validity of our Illinois River Watershed model. We will continue to take advantage of available opportunities to gain critical feedback on our efforts, and we will give careful consideration to whether additional peer review over the extensive stakeholder reviews would benefit the process. In evaluating peer review options, the EPA must consider the availability of resources and the timeframes required for such reviews. While the agency must ensure the scientific rigor of our efforts, we are also committed to completing the work in a reasonable timeframe in order to avoid prolonged uncertainty on the part of regulated dischargers in the watershed.

If you have further questions, please contact me at (214) 665-2100, or your staff may contact Ms. LaWanda Thomas, Congressional Liaison, at (214) 665-7466.

Sincerely yours,

**/s/ AL ARMENDARIZ**

Al Armendariz  
Regional Administrator

Identical letters sent to:

The Honorable Jim Inhofe  
United States Senate

The Honorable Tom Coburn  
United States Senate

The Honorable John Boozman  
United States Senate

The Honorable Dan Boren  
House of Representatives

The Honorable Steve Womack  
House of Representatives