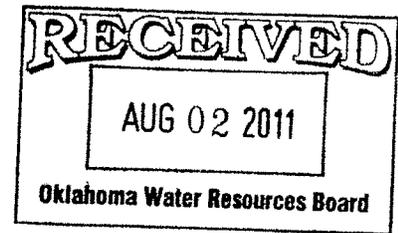




CITY OF ROGERS
Office of the Mayor
Mayor Greg Hines



July 28, 2011

To: Phillip Moershel
Water Quality Standard Section
Oklahoma Water Resources Board
3800 N. Classen Boulevard
Oklahoma City, OK 73118

Mr. Moershel:

This letter is being written in response to the Public Notice for Comments on the Oklahoma Scenic Rivers Phosphorus Criterion Review by the Oklahoma Water Resources Board (OWRB). This issue is of great importance to our City as it relates to our future growth of business and community. We currently have a population of almost 56,000 residents and have grown by 17,000 citizens over the past decade. Our City has invested millions of dollars to upgrade our wastewater treatment plant. We have adopted ordinances to protect water quality through our Stormwater Drainage Manuals requiring the use of BMP's to protect water quality and detention/retention basins to control peak stormwater discharges.

We appreciate the opportunity to provide the following comments to the Oklahoma Water Resources Board as it re-evaluates its 0.037mg/l phosphorus standard.

We are committed to continuing our work to improve water quality in the coming years, but that's not to suggest Oklahoma's 0.037 mg/l phosphorus standard will be reached. In our opinion, the 0.037 standard based on small streams in forested, undeveloped regions of the U.S. is not achievable in developed watersheds such as the Illinois River watershed.

Your request for "Contributions for Best Scientific Information Regarding Numeric Phosphorus Criteria" is being met by our Scientists and Engineers under separate submittals. It is clear in said documents that the 0.037 mg/l phosphorus standard for the Illinois River at the Oklahoma/Arkansas state line is not appropriate. We request you re-evaluate the standard based upon "Best Available Science", not on arbitrary relevance – stream methodology.

Sincerely,

Greg Hines, Mayor
City of Rogers

CC: Steve Drown, Arkansas Department of Environmental Quality
Ed Swaim, Arkansas Natural Resources Commission
Mike Malone, Northwest Arkansas Council