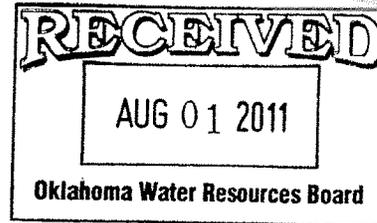


July 27, 2011



Mr. Phillip Moershel
Water Quality Standards Section
Oklahoma Water Resources Board
3800 N. Classen Boulevard
Oklahoma City, Oklahoma 73118

Mayor Doug Sprouse

201 Spring Street
Springdale, Arkansas 72764
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Dear Mr. Moershel:

The City of Springdale appreciates the opportunity to provide the following comments to the Oklahoma Water Resources Board as it re-evaluates its 0.037 mg/l phosphorus standard.

Our city and other Northwest Arkansas cities have invested \$225 million in capital expenditures related to water quality since 2000. We're proud of the tremendous steps we've taken to protect water quality in Arkansas and Oklahoma.

Our city over the past decade grew by 23,999 residents, to a population of 69,797 citizens. All the while, we've stayed attentive to water quality needs, and we've addressed them.

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. Rather, 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.

Yet, Arkansas cities, its state government and the region's companies made major improvements to protect streams flowing from Arkansas into Oklahoma.

The citizens of Bentonville, Fayetteville, Rogers, Siloam Springs and Springdale paid to build and upgrade sewer plants, and the cities enhanced sewer treatment processes to reduce phosphorus discharges. Bentonville and Tontitown are partners in a regional Northwest Arkansas Conservation Authority sewer treatment plant that will someday be expanded to provide additional high-quality sewer treatment and water protection for other Northwest Arkansas cities.

Modifying four sewer plants in Northwest Arkansas to discharge phosphorus of 0.1 mg/l instead of 1 mg/l would cost an additional \$90 million to \$100 million. It's an unbelievable amount of additional money for these communities to be called upon to spend when scientists say there would be little or no environmental benefit.

The expenditures on upgrading wastewater treatment plants don't even begin to cover the costs associated with urban stormwater controls regarding water quality. Cities would have to spend millions more dealing with the runoff from their boundaries.

The cities, however, aren't Oklahoma's only Arkansas partner in improving water quality.

The region's poultry companies, which provide thousands of jobs to Oklahomans, have spent millions of dollars developing transportation systems to help independent, contract growers send poultry litter out of the Illinois River and other Scenic River watersheds. The companies' efforts have taken tons of poultry litter to cropland in Arkansas and Oklahoma outside the Illinois River watershed.

Arkansas' state government has supported our efforts by providing low-interest loans to assist the Northwest Arkansas Conservation Authority and the city of Fayetteville with sewer treatment projects. It's required farmers to have nutrient management plans to monitor and control poultry litter's use as fertilizer. More recently, the Arkansas Natural Resources Commission took aggressive steps to ensure that lawn fertilization companies in Northwest Arkansas are spreading lawn fertilizer as required by state laws regulating the use of commercial fertilizer.

Northwest Arkansas cities, its companies and this state as a whole took major steps over the past decade to improve water quality. As Oklahoma's partner, this current process works well.

Oklahoma should — it must — now keep the promise it made in 2003 to rely on the best available science as opposed to an unattainable, arbitrary reference-stream methodology to evaluate whether the 0.037 mg/l standard is appropriate and necessary to protect each of Oklahoma's Scenic Rivers.

Regards,

A handwritten signature in black ink that reads "Doug Sprouse". The signature is written in a cursive, flowing style.

Doug Sprouse
Mayor

CC: Steve Drown, Arkansas Department of Environmental Quality
Ed Swaim, Arkansas Natural Resources Commission