

## Nancy Koon (adpce.ad)

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**From:** SCOTT STUBENRAUCH <sdstubenrauch@comcast.net>  
**Sent:** Saturday, November 26, 2022 2:52 PM  
**To:** Water Draft Permit Comment  
**Subject:** Discharge Permit #AR0053210, AFIN60-05010

Sirs:

We purchased our home at 21618 Roland Cutoff Road in Roland, Pulaski County, Arkansas in 2010. Mill Bayou abuts our property. Contrary to what you may have been led to believe, Mill Bayou is not a free-flowing stream. Most of the year it is a series of still water pools. The only water flow in the Bayou is after a rainfall. Once the Bayou wetlands are drained of a recent rainfall the water flow ceases.

In the first few years that we lived in Roland we encountered two summers of significant drought. Both of these summers Mill Bayou dried up completely. Any discharge from a sewage treatment plant, no matter how well maintained, will be concentrated in these stagnant pools and as the liquids evaporate these pools will become toxic waste ponds. These toxic pools will have the potential of poisoning all wildlife that encounter them. Even worse, these ponds will extend well beyond the applicant's property onto the property of innocents. This will pose a danger to pets, livestock and children attracted to the pools to catch tadpoles and crawfish. Add to this the applicant's history of poor maintenance of his currently permitted treatment plant and you have the perfect storm of an environmental disaster.

We were aware at the time we purchased our property that Mill Bayou occasionally rose above its banks and flooded the lower area of our property. In the first few years of our living here this would occur 2-3 times a year and only when rainfall exceeded 2 inches in a 48-hour period or less. Since that time, Mill Bayou has been flooding more often and with lesser amounts of rainfall. Lately our bottoms have been under water 6-8 times a year, and this was when rainfall exceeded 1 inch in a 24-hour period. We have recently learned that the developer of Waterview Estates has been diverting storm water runoff from the Lake Maumelle watershed side of the development to the Arkansas River side of the development causing this storm water to empty into Mill Bayou. Add to that the total obliteration of all vegetation on the 20-acre tract of the proposed Paradise Valley development with a total lack of storm water retention and our situation is becoming dire indeed.

Again, Mill Bayou is not a "free flowing stream" as it's only water source is precipitation. When there has been no rainfall for a week or two, Mill Bayou reverts to a series of stagnant pools. Adding wastewater, no matter how well treated, to these non-flowing pools can do nothing but create a public health problem. For these reasons we ask that ADEQ deny discharge permit #AR0053210 (AFIN 60-05010). We also request that the developers of Waterview Estates and the proposed Paradise Valley development be required to construct proper storm water retention facilities.

We appreciate your consideration in this matter,

Scott and Cheryl Stubenrauch

21618m Roland Cutoff Road

Roland, AR 72135