

Faizan Khan
Permits Branch, Office of Water Quality
Division of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

March, 15 2022

RE: Discharge Permit Number AR0053210, AFIN 60-05010
Paradise Valley Wastewater Treatment Plant on Roland Cutoff Road, Roland, AR

Dear Faizan Khan:

I request the permit noted above for the wastewater treatment plant (WWTP) for the development of Paradise Valley on Roland Cutoff Road be DENIED.

The same developer already has a WWTP discharging into Mill Bayou which is the target discharge site for this proposed WWTP. The first phase of the proposed development, Paradise Valley is 76 homes on 20 acres. Additional planned phases will increase this to over 450 homes. Mill Bayou will become an above ground sewer pipe to the Arkansas River.

WWTP's require diligent monitoring and maintenance to ensure there are no health risks to humans, animals or the ecology. In addition, operations of WWTP's require ready access to cash and capital. Across our State and the Nation there is much evidence that residential subdivisions do not and have not provided what is required to keep them safe. The records on the existing WWTP discharging into Mill Bayou have had numerous code violations and that WWTP appears to not have operated at acceptable levels.

Permitting WWTP's for residential subdivisions is bad public policy. Residential subdivisions should never be charged with the responsibility of being a public utility.

These WWTP's for residential subdivisions become irreversible travesties and create problems for health and environment for many decades.

Please DENY Discharge Permit AR0053210 for the Paradise Valley WWTP.

Sincerely,

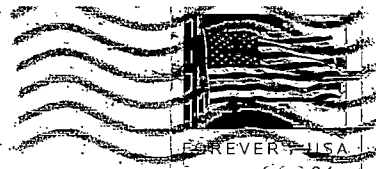
Harold W. Higgins

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