

**Koon, Nancy**

---

**From:** kathy wells <wordsmithlr@gmail.com>  
**Sent:** Saturday, April 2, 2022 1:40 PM  
**To:** Water Draft Permit Comment  
**Subject:** comment re: ARR157007 AFIN 60-05054 - Paradise Valley subdivision  
**Attachments:** pinnacle development Ferguson demand remedies apr 2022 kw.rtf

Attached please find comment letter urging denial of this permit to Rick Ferguson, the development.

Yours Truly,  
Kathy Wells

**Kathy G. Wells**  
**P.O. Box 777, Little Rock, AR 72203-0777**  
**501-960-6918**

**E-mail: [wordsmithlr@gmail.com](mailto:wordsmithlr@gmail.com)**

**2121 S. Gaines St.**

April 2, 2022  
Faisan Khan  
Permits Branch, Office of Water Quality  
Via email:  
[Water-Draft-Permit-Comment@adeq.state.ar.us](mailto:Water-Draft-Permit-Comment@adeq.state.ar.us)

Re: Permit Tracking Number: ARR157007 AFIN:60-05054

Dear Mr. Khan,

Please reject the application for the proposed sewer treatment plant of the Paradise Valley subdivision development near Roland in Pulaski County. Rick Ferguson, the developer, is on record as a "bad actor" because of the repeated violations of his Waterview development.

Your review to date of the Paradise Valley project demonstrates his failure to meet this agency's basic standards to protect the public health and the environment when a new source of sewage is constructed.

As a civic activist, I have watched as sewer treatment package plant after plant is allowed, deteriorates, pollutes property, people, animals and the environment, and, finally, is replaced at great cost with another treatment system. Please do not allow this to occur any more.

The intermittent flow of the tributary to Mills Bayou, into which treated sewage flow is proposed, is an open sewer in waiting. That design alone should be a basis to reject this proposal outright. Algae blooms occur there now.

Low-flow periods will mean straight sewage effluent goes into the tributary and into Mill Bayou, which is not supposed to be subjected to this. Corrective fluids to remedy bad smells, or pooled liquid that is not flowing onward, present another risk to the bayou, the people, the animals and the plants nearby.

The storm water runoff is likely to be polluted, so it threatens to poison Mill Bayou. In flooding conditions, there is the risk of catastrophic failure and pollution of Mill Bayou, as well as the countryside all around.

Especially troubling is the sediment basin that involves embankments in use as part of Roland Cutoff Road, which could send stormwater to lie on the county road embankment, encroaching on the Right-of-Way. That's unacceptable.

Yours Truly,

Kathy Wells