

Koon, Nancy

From: Roger or Barbie Henley <1951henleys@gmail.com>
Sent: Tuesday, June 7, 2022 12:50 PM
To: Water Draft Permit Comment
Subject: Petition to DENY Paradise Valley Permit AR0053210
Attachments: Petition Opposing Permit AR0053210.PDF

Please add the attached to the comments.

Thank you.....Barbie Henley

**PETITION to Oppose the Paradise Valley Sewage Treatment Facility
Permit# AR0053210 AFIN: 60-05010**

TO: Arkansas Division of Environmental Quality (ADEQ)

PETITIONERS STATE:

We the undersigned hereby petition the Arkansas Division of Environmental Quality (ADEQ) to deny approval of Discharge Permit Number: AR0053210 AFIN: 60-05010 being considered for the development known as "Paradise Valley" on Roland Cutoff Road in northwest Pulaski County Arkansas. The Paradise Valley Development is a large-scale urban tract home "leap-frog" development in a rural area currently platted for 76 homes and is part of a multi-Phase development project to exceed the entire population of Roland with over 400 homes requiring **two or more treatment plants** to support it as it reaches full build-out which will discharge treated waste into an unnamed tributary (**a first-order-smallest-of-the-world's streams**) thence to Mill Bayou thence to the Arkansas River.

The main reasons we oppose the sewage facility are as follows:

- The permit does not responsibly address a limit on Phosphorus (P) which is a nutrient contained in effluent that could cause overgrowths of algae in the water. Mill Bayou is stagnant and without placing a limit on Phosphorus, this is a perfect storm and invitation for harmful algae blooms to form causing documented death to humans and wildlife according to the EPA. *The community's health is at stake and the ADEQ must protect it at all costs. Health and wellness should always be the priority.*
- There is a significant archeological site that must be protected from stormwater flooding as the development reaches full build-out and the ADEQ must be sensitive to the optics of allowing sewage to dump onto it. The community stands strong for protections of this site and insists that it not be destroyed nor desecrated. *The ADEQ must ensure the cultural site is protected from erosion and desecration.*
- The natural wetlands near the proposed site of the sewage facility is not suited for wastewater treatment and will destroy aquatic species and be an environmental disaster. *The ADEQ has a responsibility to "The Natural State" to ensure their policies don't become permits to pollute.*
- The unnamed tributary, a first order stream and the smallest of the world's streams, has no flow to low flow and will receive both point-source and non-point source pollutants as it makes its way to the wetlands thence to Mill Bayou and thence to the Arkansas River. *The ADEQ must uphold standards in stream uses and realize the unnamed tributary (ditch) is wholly inadequate as a receiving stream.*



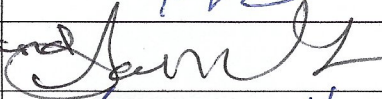
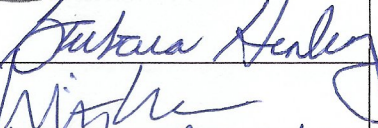
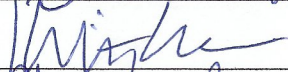
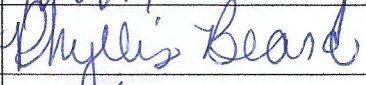


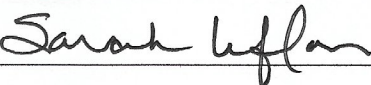
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- Metals, hormones, and prescription drugs will not be treated by this Paradise Valley sewage facility and will pass through to the environment only to be absorbed by others including humans and wildlife who come into contact with Mill Bayou and use Mill Bayou for recreation. *The ADEQ must weigh these facts regarding health hazards and see how they square with policy.*
- Maumelle Water Corporation (MWC) has expressed concern that their aquifer could be negatively impacted by the treated sewage and has requested the ADEQ perform an impact study before approving this permit. *This is a responsibility the ADEQ must address before issuing this permit or risk the health of MWC customers. We must never take our clean water for granted just because we've always had it in the Natural State. The Paradise Valley sewage facility is a threat to this order and will quickly become a costly disorder unless steps are taken by ADEQ.*
- The developer of Paradise Valley has proven by inaction the disregard for stormwater regulation. (For example, by failing to create a properly sized retention basin as cited by ADEQ and the filling of streams as cited by the US Army Corps of Engineers.) *ADEQ must take into account the history of a "bad actor" when issuing NPDES permits and deny these until the "bad actor" shows a history of respect for the ADEQ process and the law.*
- The ADEQ should require individual NPDES stormwater permits for Waterview and Paradise Valley. EPA recommends permits for point-source discharge. Point-source discharge is not being controlled with Waterview and Paradise Valley. *The community of Roland is drowning in the developer's stormwater and the ADEQ should follow EPA recommendations. It's time to respond to their SOS.*
- Paradise Valley and Waterview Estates are creating property rights issues for the community of Roland who must receive the millions of gallons of stormwater from said developments causing expensive repairs. The stormwater issues are evidenced by ADEQ's own letter to the developer in an attempt to control it. *The community also has property rights that must not be infringed and the ADEQ and other government agencies must apply their processes to protect these stakeholders as well.*

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	Name	Address	Signature
1.	Meredith Hawkins	29818 Hwy 300 ⁷²¹³⁵ Roland	Meredith Hawkins
2.	Arlene Cherven	15201 Wild Oak Ln. Roland	Arlene Cherven
3.	Jim Cherven	15201 Wild Oak Ln Roland	Jim Cherven
4.	Scott Stabenrauch	21618 Roland Cut off Road Roland	Scott Stabenrauch
5.	Sherry Lee	12701 Bart Moreland Roland	Sherry Lee
6.	Kathy Jensen	16619 Beaver Creek Rd	Kathy Jensen
7.	Paul Parris	15000 Wild Oak Lane ^{Roland AR 72135}	Paul Parris
8.	Elwood Bonner	20823 Hwy 113 - Roland AR	Elwood Bonner
9.	DAVID BARNES	1221 SIMMS CONWAY AR	David Barnes
10.	Dick Miller	15401 West Stone Dr.	Dick Miller
11.	Larry Lindahl	22916 Roland Cut-off RD, 72135	Larry Lindahl
12.	DEB CROW	24706 Highway 300, Roland	Deb Crow
13.	AL DRINKWATER	89 UNDERWOOD RD, BIGELOW, AR	Al Drinkwater
14.	Mary Bailey Ovid	33111 33111 Hwy 300 Roland	Mary Bailey
15.	Michelle Spicere	15703 Wild Oak Ln Roland ⁷²¹³⁵	Michelle Spicere
16.	[Signature]	16725 Hwy 300	[Signature]
17.	[Signature]	11311 Van Manuka	[Signature]
18.	STEVE SCHROEDER	12100 HV RD Roland	Steve Schroeder
19.	Cynthia Van Den Berghe	23000 Roland Cut off	Cynthia Van Den Berghe
20.	Randall Van Den Berghe	23000 Roland Cutoff Rd	Randall Van Den Berghe
21.	John Killingsworth	PO Box 84 25100 Roland Cutoff Rd	John Killingsworth
22.	Cheryl Stabenrauch	21618 Roland C/O Rd	Cheryl Stabenrauch
23.	Brandy Jones	19213 Wakview Meadow Ln	Brandy Jones

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	Name	Address	Signature
24.	Lynn Corley	22621 Roland Cutoff Rd 72135	
25.	Boyd Corley	same	
26.	Sarah Garrison	17100 Hurting Valley Rd Blend	
27.	Debra Henley	22624 Roland Cutoff	
28.	KRISTY EAMES	18319 BLACKBERRY LN, ROLAND	
29.	Phyllis Beard	16010 Oak St Roland	
30.	Tim Mitchell	13270 Congo Fern Dale, Alexander	
31.	Sarah Leflar	10 Executive Park WNE #425, ATL, GA.	
32.	Sarah M Leflar	4500 Walkers Corner Rd SC 29515 AR	
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