

**EXHIBIT A**

**PUBLIC COMMENT OF  
ARKANSAS RURAL WATER ASSOCIATION  
DATED APRIL 17, 2018**



# Arkansas Rural Water Association

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**ARWA Mission Statement:**

To provide Arkansas Rural Water Utilities the highest level of Training & Technical Services in order to obtain a Quality Water at the lowest possible cost.

**Date: April 17, 2018**

## **Arkansas Rural Water Association Comment on the proposed Arkansas Pollution Control & Ecology Commission Regulation 37: Arkansas Nutrient Water Quality Trading Regulation**

The Arkansas Rural Water Association (ARWA) submits these comments in support of the proposed Arkansas Pollution Control & Ecology Commission Regulation 37: Nutrient Water Quality Trading Regulation. We support the proposed Regulation. We believe it will provide our members with another tool to work toward cost-effective permit compliance.

The ARWA is a non-profit organization whose purpose is to assist water systems with day-to-day operational and management problems. Since 1977 ARWA has pursued this purpose primarily by providing classroom training, onsite training, and technical assistance to our member water and wastewater operators. ARWA also acts as a cohesive legislative voice for water and wastewater utilities – *large and small*. Today, ARWA proudly claims the state's largest water and wastewater utility membership association with more than 600 members.

In 2015, ARWA supported the adoption of Act 335 because nutrient trading offers utilities a market-driven tool that they can rely on to make more efficient improvements to water quality while also lowering capital and operational compliance costs. ARWA now supports this Regulation because it offers to make nutrient trading a reality, not merely a concept. Our member wastewater operators work every day to improve the local environment and to protect ratepayer money. This Regulation supports their work.

Arkansas's water and wastewater utilities strain to stay ahead of the ever tightening permit limits on pollutants. This struggle can often include substantial capital investments that may each require a substantial increase in the bills of the utilities' ratepayers. Nutrient trading offers a reasonable, practicable and potentially more affordable option to stay ahead of the nutrient limits in NPDES permits. Trading also has a big upside because it can address, on a voluntary basis, non-point sources of nutrient loading to Arkansas's water bodies. This may in turn lead to a more efficient and lasting achievement of water quality objectives.

ARWA also supports this Regulation because it focuses attention on specific credit-generating project proposals. Arkansas is not a "one size fits all" type state. The Regulation's flexibility ensures that our member utilities – large and small, rural and urban – can maximize opportunities for credit generation and credit trading while also promoting local considerations and local improvements to water quality.

ARWA strongly encourages the Arkansas Pollution Control & Ecology Commission to adopt the proposed Regulation 37.