

Robinson, Kelly

From: Lin Wellford <linwellford@gmail.com>
Sent: Friday, April 27, 2018 9:01 AM
To: Reg-Comment
Subject: Comments on Nutrient Trading

Thank you for this opportunity to include my comments on the viability of establishing a nutrient trading program in Arkansas.

One concern is that it appears that such programs have not yielded the expected improvements in water quality in other states where they have been tried. Another concern is that the idea is being promoted by industry as a way of addressing rising levels of agricultural runoff without actually lessening the amounts of P and N that are making their way into our waterways.

How can we begin to trust such a system when we have not yet even established baseline criteria? Who will monitor what is getting into the water and who is responsible for it, and how will such a program be paid for?

Before establishing such a scheme, it would make sense to begin with a pilot program on a smaller scale to see if what is being proposed can be made to work, and to determine how much it will cost to oversee such a program and even if it is enforceable.

Since Arkansas still lacks a plan for implementing its anti-degradation regulations, much more needs to be done to ensure that our waterways don't end up even dirtier than before. Spokesmen for industrial agricultural have stated in the past that the public needs to 'share' our most valuable waterways. It looks as if nutrient trading is just a shell game to obscure the reality that the levels of degradation will continue to rise unless we have in place stronger protections and the willingness to enforce them. Industry has too long exploited the trust the state extended to independent farmers. Contract growers have little control and almost no say in how they must operate, other than full responsibility for disposing of vast quantities of waste. This is an unsustainable model.

At the very least, no such trading should be undertaken until our state has put in place a set of water quality standards with numeric nutrient criteria standards. We need clear definitions of how much algae is considered a nuisance, and what amounts of algae need to be documented in order to declare it is 'persistent' and 'objectionable.'

ADEQ is charged with the responsibility of protecting our waters and preventing degradation, not protecting the 'rights' of polluters.

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