

Email address	molesen12@gmail.com
Full Name	Marti
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Your connection to Arkansas waters	I live near the Buffalo National River and in the region of the cities that have called for the plan. Without numerical standards and added expert ADEQ staff hired to evaluate input, this is ill timed and incomplete.
Are you a private landowner that could qualify for non-point source nutrient reduction credits?	Yes
Do you trust in ADEQ's ability to critically review applications for credit-generating projects to determine if proposed offsets will result in significant adverse effects to water quality?	No. All details outlining how credits will be calculated, administered, monitored, enforced, and how credit ratios will be determined should be open for full public participation.
Do you believe adequate consideration should be given to the impact on ADEQ and ANRC resources and staff, and how these costs will be covered, BEFORE approving a nutrient trading regulation?	Yes
Without objective criteria, do you believe ADEQ or ANRC will develop sufficient monitoring protocols to determine whether projects are resulting in an "unacceptable localized adverse effect on water quality?"	No
Comments on Regulation 37	I OPPOSE Regulation 37 as written.
Concerns	I agree with White River Waterkeeper comments and adopt

them as my own.

Additional comments

Until a realistic plan is made that includes numerical standards and ADEQ has adequate staff to deal with the additional flow of input this kind of plan would necessitate, I urge that this rule making regulation be denied.