

April 26, 2018

Written comments Attn: Kelly Robinson
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Re: Regulation 37-Arkansas Nutrient Water Quality Trading Regulation

The Mulberry River Society is a nonprofit organization comprised of individuals and organizations who seek, through Conservation, Appreciation, Recreation, Education, and Stewardship (CARES) to protect, preserve and enhance the Mulberry River, which is federally designated as a Wild and Scenic River, and is protected under Arkansas Pollution Control and Ecology Commission Regulation 2 as an Extraordinary Resource Water.

As an organization dedicated to protecting the overall quality and health of our rivers, we feel it important to publicly comment on proposed Regulation 37. Northwest Arkansas Nutrient Trading Research and Advisory Group (NANTRAG) is seeking to develop and implement an Arkansas nutrient water quality trading program. And we appreciate these efforts. However, a regional pilot program would be more appropriate, and would be useful in the development of a statewide plan. At present, Arkansas has not established total maximum daily loads, water quality effluent limitations, numeric nutrient criteria, etc. These are appropriate water quality goals necessary to create a market for trades.

Establishing and implementing such water quality standards would be protective of water quality statewide. As written, Draft Regulation 37 lacks sufficient details and safeguards to be protective of our rivers and does not ensure reduction of pollution. We need numerical standards in place before implementing any water quality trading program.

Thank you for the opportunity to provide comments on this important issue.

Sincerely,

Susan Gateley
Water Quality committee
Mulberry River Society