Email address	cjbitting@gmail.com
Full Name	Charles Bitting
Mailing Address	HC73, Box 182-A, Marble Falls, AR 72648
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	No where in the proposed Regulation is the term "Watershed" defined. Is it the HUC 2, HUC 4, HUC 8, HUC12, or some other definition of Watershed? How will the Proposed Regulation deal with Karst transport of water from one HUC to another HUC via groundwater conduits? Too many questions, too few answers. Regulation will be bad for Arkansas and Arkansans.