

Robinson, Kelly

From: Fran Alexander <fran@deane-alexander.com>
Sent: Tuesday, May 01, 2018 11:35 PM
To: Reg-Comment
Subject: ATTN: Kelly Robinson: Comment on Reg 37, Nutrient Trading

Comment on Reg 37 by Fran Alexander, 1946 Fox Hunter Rd., Fayetteville, AR 72701

Pollution, whether it's air cap and trade or water nutrient credit trade, is still pollution.

The warning, "We all live downstream," applies aptly to Reg 37 because instead of elimination of nutrient pollution, this reg allows it to be moved around. In that movement, there are no criteria for how much, what kind, and what season such nutrients are less likely to cause detrimental effects on water quality.

Until Arkansas has a thorough biological understanding of ENTIRE aquatic ecosystems from the smallest microorganisms to the largest mammals, including humans, and how each fits to create a healthy water environment for all to live in balance, any discussion of moving around pollution, is folly.

How does ADEQ plan to enforce nutrient discharge from point sources or address non-point generators?

How are those who are afforded these pollution "credits" held accountable for the quantity and identity of each nutrient?

How can we morally create a market for pollution trading, and more specifically how does nutrient trading actually protect water quality, especially if there is no ecosystem analysis as a basis for measuring harm?

If there are no total maximum daily loads or other measurable criteria outlined in the regulation that allows this crediting for pollution, then how can water quality be quantified?

If a user of our water is found to not be in compliance with whatever is set as criteria, how is this polluter to implement correction and when?

This regulation is an affront to all who use and drink water, our basic necessity for life. Water quality is literally being bought and sold as a conduit of waste generated by industries and land users, and our health is subsidizing their externalities of doing business.

ADEQ can do better by all of us.