

Email address	gary@garycawood.com
Full Name	Gary Cawood
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Your connection to Arkansas waters	As a landscape photographer, I'm always concerned with the quality of our environment, especially pertaining to water resources.
Are you a private landowner that could qualify for non-point source nutrient reduction credits?	No
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	While nutrient trading seems valid in concept, i do not have confidence that the proposed regulation will result in a positive

outcome for our waters.