

Robinson, Kelly

From: Jack Stewart <webbcreek@gmail.com>
Sent: Wednesday, May 02, 2018 3:39 PM
To: Reg-Comment
Subject: Regulation No 37: Arkansas Nutrient Water Quality Trading Regulations

As a resident of Arkansas who is particularly interested that Arkansas maintains it's reputation as the "Natural State" I am very concerned that Regulation 37: Arkansas Nutrient Water Quality Trading Regulations will not adequately protect water quality in Arkansas. The specifics are lacking and will inevitably lead to degradation of some water bodies. The compromises necessary to produce improvement in some areas will likely be at the expense of areas important to wildlife as these areas will be deemed "less important" when viewed from a wholly human perspective even though in reality to needs of wildlife and humans are intertwined

Arkansas has not always adequately taken geology into consideration when making water use decisions, with karst topography being one example.

ADEQ lacks the resources to properly manage this program and will therefore either have to reassign staff to meet the new requirements or add to the workload of existing staff.

My interest in birds and other wildlife has taken me to areas around the state to observe and study the natural environment. Many water bodies are showing algae growth and increased turbidity due to pollution from agricultural activities and erosion from human development. It is unclear how the non-point source credits will be quantified and credits determined. This is a serious lack of specificity.

At a time of rapid growth in Arkansas with all the environmental challenges that accompany growth it is distressing to see that ADEQ's enforcement authority is being diminished by this proposed regulation.

Finally, I am concerned that a poorly designed trading mechanism will inadequately protect drinking water especially for those of us who rely on wells for our household needs.

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