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<b>Full Name</b>	Pamela E. Stewart
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<b>Your connection to Arkansas waters</b>	I live at Erbie, about 1/2 mile from the Buffalo River. My husband and I collect bird sightings, write articles for nature publications, swim in the river and canoe in the summer, and have participated in river clean-ups. We have noticed an increase in turbidity, mostly after storm events
<b>Are you a private landowner that could qualify for non-point source nutrient reduction credits?</b>	Yes
<b>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?</b>	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.
<b>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?</b>	Yes
<b>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?"</b>	No
<b>Comments on Regulation 37</b>	I OPPOSE Regulation 37 as written.

**Concerns**

Some tributaries to the Buffalo have been known for some time to carry pollutants, yet as far as I know, ADEQ has not done the research to pinpoint the source, or fixed the problem. I suspect they lack the money and staff. Therefore, I do not think they would be capable of monitoring streams elsewhere. In Arkansas there is also the problem of karst topography, through which pollutants are difficult and expensive to trace.

**Additional comments**

My husband and I protected natural forest bordering Webb Creek along one side of our property, and restored prairie to the area above the forest. We compost our waste, and that includes using a composting toilet to prevent septic tank leakage into the karst. Since we are aware of other creeks in areas along the Buffalo that do carry sewage and other pollutants into the Buffalo, it is obvious that State agencies don't have the funds or ability to control nutrient run-off from land bordering streams. Thus I am against Regulation 37 until details are worked out for monitoring and fixing problems which arise from introducing nutrients to the land.