

From: faebyan@packratoc.com
To: [Reg-Comment](#)
Subject: Comment on Proposed Legislation No. 37=Arkansas Nutrient Water Quality Trading Regulations
Date: Sunday, November 04, 2018 9:13:09 PM

To:
Raeanne Gardner
Arkansas Department of Environmental Quality
Little Rock, Arkansas

From:
Faebyan Whittle
Sustainability Director
Pack Rat Outdoor Center
209 W. Sunbridge Drive
Fayetteville, AR 72703

To:
Raeanne Gardner
Arkansas Department of Environmental Quality
Little Rock, Arkansas

From:
Faebyan Whittle
Sustainability Director
Pack Rat Outdoor Center
209 W. Sunbridge Drive
Fayetteville, AR 72703

Re:
Public Comment on Proposed Regulation No. 37 ? Arkansas Nutrient Water
Quality Trading Regulations

Dear Ms. Gardner:

These comments are submitted on behalf of Pack Rat Outdoor Center, which has been in business in Fayetteville, Arkansas for over 45 years. It is critical to the success of our business and of other Arkansas businesses in the outdoor recreation industry that the water quality of Arkansas' lakes, rivers, and streams be protected. Arkansas' outdoor recreation economy generates \$9.7 billion in annual consumer spending and maintains 96,000 jobs statewide (<https://outdoorindustry.org>).

A September 26, 2018, Editorial by the Arkansas Democrat Gazette questioned the appropriateness of the proposed Arkansas Nutrient Water Quality Trading Regulations. (<http://www.nwaonline.com/news/2018/sep/26/nwa-editorial-wanna-trade-20180926/>). The newspapers opined that the proposed regulation needed to be more specific. Pack Rat agrees. The terms in the proposed regulation need to be defined, clear implementation procedures need to be provided, additional in-stream monitoring networks need to be established, and numeric water quality standards need to be set.

The Democrat Gazette article began with the sentence "Does it take a village to clean up Northwest Arkansas' waterways?" Pack Rat believes that instead of having a nutrient water quality trading regulation that was developed by just four municipal wastewater facilities, there

should be a 'village' approach. It is premature to finalize the proposed Regulation No. 37. The Arkansas Department of Environmental Quality should convene a workgroup of diverse stakeholders to consider the issue of nutrient trading and to work with ADEQ to come up with a regulation that is both implementable by ADEQ and protective of water quality in Arkansas.

Thank you.

Faebyan Whittle
Sustainability Director
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"Optimism is the faith that leads to achievement.
Nothing can be done without hope and confidence."
-Helen Keller