

From: [Lin Wellford](#)
To: [Reg-Comment](#)
Subject: Comments on proposed Reg 37
Date: Monday, November 05, 2018 9:39:44 AM

Dear Director Keogh and Staff,

Thank you for this opportunity to comment on the Third Party Rule-making proposal for establishing a nutrient trading program.

In an effort to learn more about nutrient trading, I found the link below helpful.

http://www.jrap-journal.org/pastvolumes/2010/v42/v42_n2_a2_greenhalgh_selman.pdf

Quoting some points made:

“Nonpoint-source pollution, such as that from many agricultural sources, enters waterways diffusely via surface runoff or subsurface leaching and is highly variable depending on factors like soil type, landscape topography, (geology) and rainfall. This makes it highly unpredictable and difficult to measure. The establishment of WQT programs is less straightforward than for some other pollutants such as carbon and sulfur dioxide emissions.”

In other words, coming up with a one-size-fits-all program will be extremely challenging. Watersheds in the Ozarks differ from those in the Delta or in the southwest corner of our state. Trading credits between watersheds is particularly problematic because of this.

On page 115 of the above referenced document, is a section called: **Hurdles encountered and factors contributing to the success of WQT programs.** The three categories are Design, Development and Operations. Each of these categories address the challenges that other trading plans have encountered. The take-away is that trading credits is complicated by a number of factors, and those factors will differ by watershed. Most of the plans are designed around a specific watershed with its unique geologic makeup and mix of land uses and pollutants.

These types of programs have many moving parts that require careful study and the establishment of baseline data in order to be effective. Success or failure depends on how well a program is designed and developed. Quick fixes are unrealistic

This push for Arkansas to implement a trading program appears to be industry driven by polluters with the most to gain anxious to implement programs quickly, and at the expense of the general public, as is so often the case. Water quality issues will be moving to the forefront increasingly in the next decade. Protecting our rivers, lakes and oceans has never been more pressing. As someone who has seen first-hand how quickly a national river in our state can become impacted and impaired by poor decision making and industry pressure, I urge all involved to slow down and learn from the successes and failures of other such trading programs before committing to spending tax dollars unwisely.

Lin Wellford
9328 Hwy 62 E.,
Green Forest, AR 72638