

**From:** Karen Schaefer [kschaefer@sunbeltenv.com]

**Sent:** Friday, February 18, 2011 5:13 PM

**To:** Chibnall, Tim

**Cc:** 'Bruce Trimble'; Kyle Davidson; dpowell@sunbeltenv.com; Chris Schaefer

**Subject:** Core Group Comments

Tim,

I will be on vacation during the next meeting. I do want to provide some comments regarding the proposed rules, specifically the issues related to off-site delineation and LTS for off-site properties. There is a considerable population not represented in the stakeholder group, that being the off-site property owners. This was mentioned during the last meeting but I would like to reiterate. I know that the department has made efforts to bring some of these property owners to the table and it is understandable that they decline to come. The process is complex and can be difficult to engage in for those that are fairly well versed in MRBCA, and most affected property owners do not have the time or inclination to participate, much less want to represent that stakeholder subgroup. So I believe that we all have a responsibility to be fair and equitable in our consideration of off-site issues with the owners in mind. I also think that well-crafted LTS provisions can protect RPs, with less potential for litigation and exposure. I think attempts to educate off-site owners could be beneficial. Knowledge generally leads to understanding and less fear and people should have the opportunity to be a part of the conversation when it impacts their lives. By the end of the process informed owners might be more likely to agree to LTS mechanisms and be better able to discuss the issues with potential buyers and lenders. Maybe I am being unrealistic and I know that many feel the less said the better. I also know there are many potential repercussions and there are no clear cut answers, but better communication with off-site owners is something that should be considered in my opinion.

Thank you,

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President

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