

Schaben, Darlene

From: Ron Coleman <ron@openspacestl.org>
Sent: Monday, September 16, 2013 2:36 PM
To: Hoke, John
Subject: Comments on 10 CSR 20-7.031 Water Quality Standards
Attachments: Water Quality Standards Ltr. 9-12-13.docx

John: Please find attached comments from the Open Space Council for the St. Louis Region regarding proposed amendments to 10 CSR 20-7.031 Water Quality Standards. A hard copy was mailed to you on 9/13 as well.

should you have any questions please feel free to contact me at anytime.

Thank you for your work on this important issue.

--

Ron Coleman
Executive Director
ron@openspacestl.org
636-451-6090 (O)
314-614-2249 (C)



September 13, 2013

John Hoke, Missouri Department of Natural Resources
Water Protection Program
P.O. Box 176,
Jefferson City, MO 65102-0176

VIA [email john.hoke@dnr.mo.gov](mailto:john.hoke@dnr.mo.gov)

RE: Open Space Council Comments on Proposed Amendments to 10 CSR 20-7.031 Water Quality Standards

Dear Mr. Hoke:

I am submitting this letter to comment on the Proposed Rulemaking for 10 CSR 20-7.031 Water Quality Standards on behalf of the Open Space Council for the St. Louis Region.

For nearly 50 years the Open Space Council (OSC) has been a leading advocate for clean streams in the St. Louis Region. Particularly, the Meramec River Basin. Each year for the past 46 years OSC has organized and mobilized thousands of volunteers to participate in one of America's longest and largest ongoing river restoration projects in America-Operation Clean Stream (OCS), Stream Team #5.

Over the past 12 years alone "Clean Stream" has inspired 26,000 citizen volunteers to donate an estimated 155,542 hours of service to remove 4,740 cubic yards of unsightly trash and debris, nearly 22,000 waste tires and tons of metal items from the banks of the Meramec River and its tributaries. The many streams located in the 4000 square mile Meramec Basin bear no resemblance to the degraded condition that they were in during the 1950's and 1960's.

Although much of the natural beauty and more riparian corridor habitat has been enhanced by five decades of clean water advocacy and restoration work by Operation Clean Stream it is still not enough. The visual aesthetics are much improved, but the invisible culprit in the form of pollutants lurking in our waters that find their way into the stem of our river ways from currently unprotected tributaries remain largely unchecked today. We must take strides to expand upon the further protection of such unclassified waters in our state.

We understand that Proposed Rulemaking for 10 CSR 20-7.031 Water Quality Standards is a positive step; however, it still fails to provide default fishable and swimmable designations to all waters of the state in Missouri as required by state law. Fishable/swimmable use designations enable the application of scientific water quality standards to ensure the waters stay clean enough for fish, aquatic animals, and people. Nearly every other state applies default fishable and recreational uses to its waters. Missouri should do the same.

Because the Proposed Rule omits many of Missouri's headwater streams, lakes, and our wetlands, it would leave many forms of aquatic life, birdlife and other wildlife without sufficient protections to keep them healthy. These omissions also put swimmers, waders, floaters and boaters at increased risk of illness. We informally estimate that Meramec Basin alone attracts 1 to 2 million annual visitors to its waters and floodplains for many forms of outdoor recreation. Their health should not be put at risk.

The Open Space Council in partnership with numerous other public and private entities embarked on a "Lower Meramec River Source Drinking Water Protection Project" during 2006-2009 knowing that the Meramec River is the primary source of drinking water for more than 200,000 people in St. Louis, Franklin and Jefferson Counties. There was consensus from those involved in the study that we cannot ignore the need to enact greater measures to protect this valued resource knowing that it is not expendable.

The Dept. of Natural Resources first promised to have default fishable/swimmable use designations for Missouri waters in place by 2003. Another decade has passed and Missourians are still denied the benefits of the Clean Water Act.

The Open Space Council encourages the enactment of this Proposed Rule which advances water quality protections in Missouri. In addition, we request that you commit to establishing protections for all waters of the state to protect our wetlands, lakes, and headwater streams and to achieve compliance with state law and with the Clean Water Act. Missouri waters deserve adequate protections to safeguard their health and our heritage.

Our message as it was with the first Operation Clean Stream held in 1967 is much the same as it was then "Keep Our Rivers Clean" the passage of this Proposed Rule can help us to achieve this worthy goal. Thank you for your support of this measure.

**Sincerely,
Ron Coleman
Executive Director**

**Cc: OSC Advocacy Committee
and Board of Directors**



The Open Space Council
for the St. Louis Region

RECORDED

SEP 17 2013

WATER PROTECTION PROGRAM

September 13, 2013

**John Hoke, Missouri Department of Natural Resources
Water Protection Program
P.O. Box 176,
Jefferson City, MO 65102-0176**

VIA email john.hoke@dnr.mo.gov

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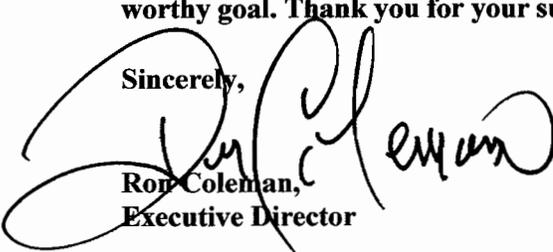
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Ron Coleman,
Executive Director