



SEP 17 2013

September 12, 2013

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

RE: Proposed Amendments to 10 CSR 20-7.031 Water Quality Standards

Dear Mr. Hoke:

The South Grand River Watershed Alliance is submitting this letter to comment on the Proposed Rule-making for 10 CSR 20-7.031 Water Quality Standards. The SGRWA is a local nonprofit group dedicated to the protection of the South Grand River Watershed and concerned for all Missouri's waters.

The Proposed Rulemaking for 10 CSR 20-7.031 Water Quality Standards 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 remain clean enough for fish, aquatic life, 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 wetlands, it leaves aquatic and terrestrial habitats without sufficient protections to improve and maintain their health. These omissions also put swimmers, waders, floaters, and boaters at increased risk of illness. In addition, the Proposed Rule continues to make it too easy to ignore the hydrologic benefits of headwater streams. Keeping headwater streams intact would greatly decrease the negative impacts of conventional development on stream channel stability.

To protect a river like the South Grand, it is essential to look beyond the river and provide protection for all the tributaries that feed into the river. Surely by now everyone has sufficient understanding about watershed protection to realize that all streams are important.

The Department of Natural Resources first promised to have default fishable/swimmable use designations for Missouri waters in place by 2003. But here it is a decade later and Missourians are still denied the benefits of the Clean Water Act.

Please approve this Proposed Rule which advances water quality protections in Missouri. In addition, the South Grand River Watershed Alliance requests 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.

Thank you for the opportunity to comment. We look forward to clean streams in Missouri.

Sincerely,

  
Doris Sherrick, Secretary

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