



Missouri
Department of
Natural Resources

DRAFT ST. FRANCIS RIVER TMDL
PUBLIC COMMENTS

Public Notice
Nov. 18 – Dec. 18, 2005

**St. Francis River
WBID # 2835**

St. Francois County, Mo.

Missouri Department of Natural Resources
Water Protection Program
PO Box 176
Jefferson City, MO 65102-0176
800-361-4827 / 573-751-1300



MISSOURI DEPARTMENT OF CONSERVATION

Headquarters

2901 West Truman Boulevard, P.O. Box 180, Jefferson City, Missouri 65102-0180
Telephone: 573/751-4115 ▲ Missouri Relay Center: 1-800-735-2966 (TDD)

JOHN D. HOSKINS, Director

REPLY TO: Resource Science Center
1110 S. College Ave.
Columbia, MO 65201
Telephone: 573-882-9880
Fax: 573-882-4517

December 15, 2005

Ms. Anne Peery
Department of Natural Resources
WPP, Water Quality Monitoring and Assessment Section
P.O. Box 176
Jefferson City, MO 65102-0176

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WATER PROTECTION DIVISION

Dear Ms. Peery,

The Missouri Department of Conservation (Department) appreciates the opportunity to provide comments on the Total Maximum Daily Loads for the St. Francis River in St. Francois County. The Department fully supports the attainment of the water quality standards necessary to meet the goals of the Clean Water Act in the State of Missouri as they are essential to protecting the fish, forest and wildlife resources of the state.

The St. Francis River drainage contains two species of crayfish that occur nowhere else in the world. These crayfish are declining in numbers in that drainage and could soon be eligible for listing as "threatened" under the federal Endangered Species Act. Currently, biologists are not seeking Endangered Species Act listing status for these species, but they are concerned about water quality issues in the drainage that might precipitate further decline of these species. If listed, much closer scrutiny and enforcement by the federal government would follow. All attempts to prevent pollutants from entering the St. Francis River drainage and improve water quality in this drainage on a voluntary basis are recommended.

We are unaware of any additional point sources that might contribute to the low dissolved oxygen levels in the St. Francis River. However, non-point source run-off from land uses upstream may be a potential cause of the low dissolved oxygen.

Thank you for the opportunity to comment. Please contact me at (573) 882-9909 ext. 3297 or Cindy.DiStefano@mdc.mo.gov if you have any questions.

Sincerely,

Cindy DiStefano
Cindy DiStefano
Resource Scientist

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DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

December 23, 2005

Ms. Cindy DiStefano, Resource Scientist
Resource Science Center
1110 South College Avenue
Columbia, MO 65201

Dear Ms. DiStefano:

Thank you for reviewing the St. Francis River Total Maximum Daily Load (TMDL) and taking time to comment.

We appreciate you pointing out that there are rare crayfish in the St. Francis River drainage system. The Environmental Protection Agency tracks the status of endangered and threatened species in relation to all waterbodies on the 303(d) list just as they would on all other waters containing sensitive biota. We ensure they receive information about our monitoring efforts and about our actions to protect water quality. We hope this interaction with EPA furthers the effort to prevent harm to sensitive species.

I realize from your letter that you want specific assurance of protection to these species through the administration of the State Water Quality Standards and this TMDL. While we do not have specific criteria to protect individual species, the criteria used to protect aquatic life place limitations on pollutants harmful to a range of aquatic life forms, including those that are particularly sensitive to pollutants. This is not a guarantee of the effectiveness of these standards with respect to unusual or rare species. Therefore, we must couple the standards with appropriate monitoring of the aquatic life in our streams. As you know, we do some monitoring throughout the state, but for monitoring efforts focused on rare species, we must look to EPA, your office, and the U.S. Fish and Wildlife Service to assist in providing information of species decline. Any indication of decline would be substantial reason to examine the standards, the controls on discharges, and/or the implementation of the TMDLs. We encourage your office to let us know as soon as those effects are suspected.

Making the standards especially tight on streams with rare species without any indication of species decline does not appear to be justified without some evidence or scientific analysis pointing to potential for harm. If able, we would wish to prevent any impact by knowing the effects of pollutants before they are discharged into a stream. Unfortunately, information on the effects on various pollutants on certain species, especially the rare types, is limited or unavailable. Therefore, close monitoring of aquatic life for the effectiveness of the current standards may be our best option until more specific standards are set for individual species.

Ms. Cindy DiStefano
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Recognizing that we cannot make these revisions to our standards in the immediate future, the TMDL was finalized without any changes as a result of your comments. Consequently, we will be submitting the TMDL to EPA for approval as it was originally written for public comment. We would also ask your agency to assist us in monitoring the success of the implementation plan in protecting aquatic life.

Again, thank you for commenting. The Department of Conservation's interest in the TMDL process and concern for the health of Missouri's water resources are appreciated. If you have other questions or wish to discuss this further, please contact Anne Peery of my staff at (573) 526-1426, by e-mail at anne.peery@dnr.mo.gov or at Missouri Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, Missouri 65102-0176.

Sincerely,

WATER PROTECTION PROGRAM



Philip A. Schroeder, Chief
Water Quality Monitoring and Assessment Section

PAS:apl