Missouri
Department of
Natural Resources

RECREATIONAL USE ATTAINABILITY ANALYSES
PUBLIC COMMENTS

Public Comment Period
May 21, 2008 – August 31, 2008

Sugar Branch
WBID #1029

Class P
Boone County

Missouri Department of Natural Resources
Water Protection Program
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Boone County Regional Sewer District

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WATER PROTECTION PROGRAM

August 28, 2008

Ed Galbraith
Director
Water Protection Program
Missouri Department of Natural Resources
P O Box 176
Jefferson City, MO 65102-0176

Dear Mr. Galbraith:

The Boone County Regional Sewer District would like to take this opportunity to comment upon the "Modifications to Table H based on UAA Results" as published on the Missouri Department of Natural Resources (MDNR) web site.

The Sewer District supports the goal of these changes – that of improving water quality in the State of Missouri and protecting public health. However, the Sewer District requests that the ideal nature of the changes, specifically proposing that all classified waterways of the State of Missouri must be suitable for whole body contact recreation and secondary contact recreation, be balanced with the practicality of this ideal as well as the possible unintended consequences. The Sewer District contends that the classification of all waterways as swimmable is not warranted given the nature of many of the state's waterways. Furthermore increasing the number of wastewater treatment facilities that must disinfect will result in either a greater risk of chemical accidents among those facilities as well as a decrease in water quality as a result of the byproducts of disinfection or an increase in electrical consumption by sanitary sewer utilities and the resulting increase in greenhouse gases.

WHOLE BODY CONTACT RECREATION

SUGAR BRANCH (WATER BODY IDENTIFICATION (WBID) NUMBER 1029 AND 1030)

It appears that whole body contact recreation is being added to two Boone County water bodies: Hominy Creek and Sugar Branch. In regards to the Sugar Branch, the Sewer District commissioned a Use Attainability Analysis (UAA) in July 2005. The enclosed UAA concluded that "the Whole Body Contact use designation and the Secondary Contact Recreation use designation are unattainable per MDNR stream depth criteria." Based on this conclusion the Sewer District believes that the Sugar Branch should not be classified for Whole Body Contact or Secondary Contact recreation.

A recreational designation for the Sugar Branch could affect the Sewer District's Trails West Lagoon. The Sewer District's 2007 Capital Improvements Plan (CIP) programs $1,405,556 for a pump station to pump the wastewater from the Trails West Lagoon to the Midway Crossing Wastewater Treatment Plant (WWTP) and increase the capacity of the Midway Crossing WWTP. This capital improvement is planned for sometime after 2013.

In April 2008 Boone County voters approved an additional $21,000,000 in revenue bond authority for the Sewer District to stay in compliance with the water quality standard for bacteria. The CIP projects user rates to be about $62 per month by 2013. This additional $21,000,000 in revenue bond authority will allow the Sewer District to close about 17 lagoons and WWTPs and add disinfection to 2 wastewater treatment facilities by the end of 2013. Improvements to the Trails West system are not included in the $21,000,000 bond issue.

At a minimum, if whole body contact recreation is added as a beneficial use to the Sugar Branch, then those wastewater treatment facilities subject to disinfection as a result should have at least 3 to 5 years beyond 2013 before compliance with the bacterial standard is required.

UNNAMED TRIBUTARY TO PERCHE CREEK (WBID 1006)

It appears that whole body contact recreation is being deleted from one Boone County water body: an unnamed tributary to Perche Creek. Based on a review of the supporting documentation, the Sewer District supports the removal of Whole Body Contact Recreation as a beneficial use from this unnamed tributary to Perche Creek.

SECONDARY CONTACT RECREATION

It appears that secondary contact recreation is being added to five Boone County water bodies: Bear Creek, Callahan Creek, Hominy Creek, Kelley Branch, and the North Fork Grindstone Creek.

CALLAHAN CREEK (WBID 1028)

In regards to the Callahan Creek, the Sewer District has reviewed the supporting documentation for adding secondary contact recreation as a beneficial use to the Callahan Creek. The RESULTS OF THE INTERNAL REVIEW COMMITTEE state that, "Due to evidence of secondary contact (fishing lure and fireworks), the Secondary Contact Recreation use designation is recommended to be assigned." Based on this scanty evidence the Sewer District believes that the Callahan Creek should not be classified for Whole Body Contact or Secondary Contact recreation.

A recreational designation for the Callahan Creek could affect the Sewer District's Rollingwood WWTP. The Sewer District's 2007 CIP programs $182,900 for a pump station to pump the wastewater from the Rollingwood WWTP to the Midway Crossing WWTP. Sufficient capacity exists at the Midway Crossing WWTP for the flow from the Rollingwood WWTP. This capital improvement is planned for sometime after 2013.

In April 2008 Boone County voters approved an additional $21,000,000 in revenue bond authority for the Sewer District to stay in compliance with the water quality standard for bacteria. The CIP projects user rates to be about $62 per month by 2013. This additional $21,000,000 in revenue bond authority will allow the Sewer District to close about 17 lagoons and WWTPs and add disinfection to 2 wastewater treatment facilities by the end of 2013. Improvements to the Rollingwood WWTP system are not included in the $21,000,000 bond issue.

At a minimum, if secondary contact recreation is added as a beneficial use to the Callahan Creek, then those wastewater treatment facilities subject to disinfection as a result should have at least 3 to 5 years beyond 2013 before compliance with the bacterial standard is required.

KELLEY BRANCH (WBID 1018)

In regards to the Kelley Branch, the Sewer District commissioned a Use Attainability Analysis (UAA) in July 2005. The enclosed UAA concluded that "the Whole Body Contact use designation is unattainable in accordance with MDNR stream depth criteria. Similarly, the Secondary Contact Recreation (boating and canoeing) use is not attainable, per MDNR stream depth criteria." Based on this conclusion the Sewer District believes that the Kelley Branch should not be classified for Whole Body Contact or Secondary Contact recreation.

A recreational designation for the Kelley Branch could affect the Sewer District's Sunnyslope Lagoon and the Quarter Mile Hills Lagoon. The Sewer District's 2007 Capital Improvements Plan (CIP) programs $115,140 for a gravity sewer to connect the Sunnyslope Lagoon to Hallsville's wastewater treatment and collection system. The Sewer District's 2007 Capital Improvements Plan (CIP) also programs $475,180 for a pump station to pump the wastewater from the Quarter Mile Hills Lagoon to Hallsville's wastewater treatment and collection system. These capital improvements are planned for sometime after 2013.

In April 2008 Boone County voters approved an additional $21,000,000 in revenue bond authority for the Sewer District to stay in compliance with the water quality standard for bacteria. The CIP projects user rates to be about $62 per month by 2013. This additional $21,000,000 in revenue bond authority will allow the Sewer District to close about 17 lagoons and WWTPs and add disinfection to 2 wastewater treatment facilities by the end of 2013. Improvements to the Sunnyslope and Quarter Mile Hills systems are not included in the $21,000,000 bond issue.

At a minimum, if secondary contact recreation is added as a beneficial use to the Kelley Branch, then those wastewater treatment facilities subject to disinfection as a result should have at least 3 to 5 years beyond 2013 before compliance with the bacterial standard is required.

NORTH FORK GRINDSTONE CREEK (WBID 1010)

In regards to the North Fork Grindstone Creek, the Sewer District commissioned a Use Attainability Analysis (UAA) in July 2005. The enclosed UAA concluded that "the

Whole Body Contact use designation is unattainable in accordance with MDNR criteria. Similarly, the Secondary Contact Recreation use is not attainable, per MDNR stream depth criteria." Based on this conclusion the Sewer District believes that the North Fork Grindstone Creek should not be classified for Whole Body Contact or Secondary Contact recreation.

A recreational designation for the North Fork Grindstone Creek could affect the Sewer District's Highfield Lagoon and the Shaw WWTP. The Sewer District's 2007 Capital Improvements Plan (CIP) programs $213,580 for a gravity sewer to connect the Highfield Lagoon to Columbia's wastewater treatment and collection system. The Sewer District's 2007 Capital Improvements Plan (CIP) also programs $900,340 for a gravity sewer to connect Shaw WWTP to Columbia's wastewater treatment and collection system. These capital improvements are planned for sometime after 2013.

In April 2008 Boone County voters approved an additional $21,000,000 in revenue bond authority for the Sewer District to stay in compliance with the water quality standard for bacteria. The CIP projects user rates to be about $62 per month by 2013. This additional $21,000,000 in revenue bond authority will allow the Sewer District to close about 17 lagoons and WWTPs and add disinfection to 2 wastewater treatment facilities by the end of 2013. Improvements to the Highfield Lagoon and the Shaw WWTP systems are not included in the $21,000,000 bond issue.

At a minimum, if secondary contact recreation is added as a beneficial use to the North Fork Grindstone Creek, then those wastewater treatment facilities subject to disinfection as a result should have at least 3 to 5 years beyond 2013 before compliance with the bacterial standard is required.

The Sewer District asks the Clean Water Commission to make every effort to create a rule regarding the beneficial uses of Missouri streams that is environmentally and financially responsible. The Sewer District respectfully requests that the CWC identify streams that warrant Whole Body Contact and Secondary Contact recreation thereby protecting public health as well as minimizing the impact on the public's monthly sewer bills.

Thank you for your commitment to the State of Missouri and thank you for your consideration of the comments noted above.

Yours truly,
BOONE COUNTY REGIONAL SEWER DISTRICT

Tom Ratermann
General Manager

Enclosures

C: Rob Morrison, MDNR without enclosures
John Hoke, MDNR without enclosures