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08/06/2007 03:48 PM

To mark.osborn@dnr.mo.gov

cc

bcc

Subject Draft Regulatory Impact Report

History:

✉ This message has been replied to.

Mark:

I will be unable to attend the meeting tomorrow. However, I'd like to offer a few comments on the draft RIR.

Some reference to eutrophication as a natural process seems relevant, perhaps in the response to Question #1 on the RIR. The 2006 Missouri Water Quality Report makes such a reference (page 19) in the section on Missouri lakes.

The characterization of non-point source contributions to nutrient loading in response to Question #3 does not identify wildlife or septic systems as potentially significant sources. Under the subheading "Controlling Pollution in Lakes" the 2006 Missouri Water Quality Report characterizes non-point sources and provides information on state programs that support non-point source management.

In the response to Question #4, a disclaimer with the citation of the Interdisciplinary Environmental Clinic's paper would clarify that the costs and benefits reported from studies in other states are not necessarily applicable in Missouri and further analysis is required.

In the response to Question #10, the reference to impaired waterbodies listed primarily for nutrients in 1998 should be clarified by specifying that these waterbodies are located almost exclusively in a five-county region in southwest Missouri and the percentage is based on total miles of streams listed statewide (unless I've misinterpreted the reference).

Thanks for the opportunity to comment. I regret that I cannot participate tomorrow in person. Leslie