

APR 21 2008



Matt Blunt, Governor • Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

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April 16, 2008

Conservation Federation of Missouri
David W. Murphy
Executive Director
728 West Main Street
Jefferson City, MO 65101-1559

Dear Mr. Murphy:

I would like to again commend the Conservation Federation of Missouri for its consistent leadership in regards to the stewardship of our state's natural resources. The department appreciates the opportunity to provide comment regarding three of the resolutions recently developed by the Conservation Federation of Missouri. Comments regarding each of the resolutions are provided below.

Use of Missouri Source and Origin Native Plant Seed/Materials

For projects that seek to restore diverse native plant communities, the Department of Natural Resources supports the use of native species which are genetically adapted to local soil and climatic conditions. The use of regionally adapted native plant species not only promotes the establishment of a historically correct habitat, but offers the economic benefit of improved chances for positive project outcome. In addition, use of species originating from outside of an ecological region risks compromising the genetic integrity of local native populations with a degrading result.

The department's Division of State Parks has an active history regarding restoration of terrestrial natural communities. Projects implemented within the park system follow sound ecological principles and utilize seed sources genetically appropriate for goals of the restoration site. For projects occurring in our most significant state parks, a Vegetation Establishment guideline promulgates the use of native seeds originating from within the ecological section or subsection. In such situations, a voucher specimen or record is required, validating that the species occurs, or historically occurred, within the park or immediately adjacent in similar habitats.

The department has purchased tools to enable park managers to collect local native seeds onsite for park restoration projects. In addition, state park contracts for native seed or plants have been developed to identify 'local ecotype' native seed vendors who can comply with both the mission of the State Parks Division and the Vegetation Establishment guidelines.

Re-vegetation projects designed to reduce and abate soil erosion are also promoted by the department's Soil and Water Conservation Program. However, by statute, the purpose of the state cost-share program is to reduce or abate soil erosion. Soil erosion reduction practices establishing permanent vegetative cover are eligible for cost-share by the Soil and Water Conservation Program and they are implemented in accordance with USDA standards as specified by the Pasture and Hayland Standard (512). In some



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situations, landowners participating in the state cost-share program may elect to go beyond the Pasture and Hayland standard when obtaining seed and elect to utilize seed sources required in the 643 standard. In such cases the practice would still have to be managed in accordance with the 512 standard to meet Soil and Water Conservation Program cost-share guidelines.

Guide to Salt Storage Requirements

The potential adverse impact to both surface water and groundwater resources following the application of road salts is gaining national recognition. Other states have reported cases of elevated chloride levels in drinking water sources and the source has been linked to the routine application of road salts during winter weather events. The Missouri Department of Natural Resources currently requires storm water permits for large municipalities, including provisions that address the storage of road salts. The department is currently engaged in implementation of phase II storm water regulations, which will require similar permits for smaller communities. Permitted facilities are specifically asked to address controls for reducing or eliminating the discharge of pollutants from sites such as salt/sand storage locations, as well as snow disposal areas.

A significant impact from road salts likely results from road surface runoff following the application of salts during winter storms. The department currently provides staff and support for a state-wide volunteer water quality monitoring program. In response to salt runoff concerns, the program recently introduced specific testing for chloride levels as part of its monitoring efforts. Several communities in the state have begun to experiment with alternatives to chloride-based salts for reducing winter road hazards. Several of these alternatives are organically derived (corn or beet products) and have proven to be effective alternatives to traditional road salt use.

The department intends to stay engaged in respect to road salts issues in regards to both application and storage. Encouraging alternatives to traditional road salts and implementing the use of the best management practices required under storm water regulations are both positive steps towards addressing the larger sources of road salt pollution and the impacts to the waters of the state.

Effect of Atrazine on Water Quality

The Missouri Department of Natural Resources agrees that additional research into the potential effects of Atrazine on water quality and human health would be constructive in developing strategies to address concerns associated with the use of this herbicide. In regard to the presence of Atrazine in drinking water sources, the Missouri Department of Natural Resources established a Maximum Contaminant Level (MCL) of 3 parts per billion in 1993. Since this time, public drinking water systems have been required to monitor for Atrazine. Systems found to be in violation are required to issue a public notice to customers and submit a compliance schedule outlining an approach to return the system to compliance.

When such testing was initiated in 1994, ten public drinking water systems in Northern Missouri were found to be in violation of the Atrazine MCL. Following the installation of activated carbon filters by the effected public drinking water distribution systems, the incidence of MCL violations has been greatly reduced, with only one exceedence each in 2006 and 2005. To date, Atrazine in public drinking water supplies has uniformly been associated with surface water systems and no compliance issues for groundwater systems have been reported in the state of Missouri.

In an effort to further address the presence of Atrazine in effected surface waters, the department's 319 program funded several projects in partnership with the University of Missouri Extension Program and

others. These programs were designed to address non-point source pollution within the watersheds of several targeted reservoir systems. Best management practices were developed and successfully implemented regarding the use of Atrazine.

The department also worked with elements of the Missouri Conservation Reserve Enhancement Program (MoCREP). MoCREP was used to facilitate the enrollment of producers whose lands drained into effected Public Drinking Water systems. Such land owners were encouraged to participate in placing targeted acreages in the Conservation Reserve Program. These efforts served to eliminate the application of Atrazine for a portion of the lands adjacent to the effected water bodies.

The department's Soil and Water Conservation Program also provided direct assistance to farmers, both technically and financially to implement Pest Management Plans addressing the application Atrazine. This support was through the department's Special Area Land Treatment (SALT) initiative.

The result of this coordinated effort by the department and its partners is that the majority of the state's effected reservoirs have been the successfully delisted from the EPA 303d impaired waters list for Atrazine.

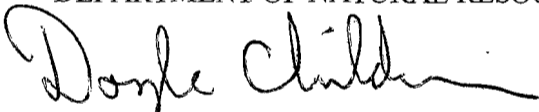
Although there have been significant improvements in protecting water bodies from Atrazine contamination in recent years, the department recognizes on-going concerns regarding the use of Atrazine as an agricultural herbicide and has supported the initiation of a special review by the Environmental Protection Agency. EPA has indicated it will be conducting comprehensive risk benefit analysis on the use of Atrazine and Triazines in general and is anticipated to issue further guidance on the use of this class of chemicals.

Because the department provides staff support for the Missouri Clean Water Commission and Soil and Water Districts Commission, we will insure that they receive a copy of the resolution and know of your concerns.

Again, I thank you and your members for their stewardship efforts, and I look forward to continuing a successful partnership between the Missouri Department of Natural Resources and the Conservation Federation of Missouri.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES



Doyle Childers
Director

c: Clean Water Commission
Soil & Water Districts Commission