



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Mike Kehoe
Governor

Kurt U. Schaefer
Director

February 28, 2025

Erin Keys, P.E.
Engineering & Operations Manager
City of Columbia Sewer & Storm Water Utilities
P.O. Box 6015
Columbia, MO 65205

RE: Municipal Separate Storm Sewer System (MS4) Operating Permit Renewal
Boone County, City of Columbia, and University of Missouri MS4 (MO-0136557)

Dear Erin Keys:

The Missouri Department of Natural Resources (department) Water Protection Program received a joint application for the Boone County, City of Columbia (city), and University of Missouri co-permittee MS4 operating permit renewal on December 23, 2024. This correspondence pertains to the MS4 permit's Stormwater Management Plan (SWMP) in general, and the Illicit Discharge Detection and Elimination Minimum Control Measure (MCM 3) in particular. The department is requesting additional details and measures be included in the SWMP to address potential impacts to water quality from homeless encampments within city boundaries.

Since November 2022, the department has received and referred to the city for appropriate action approximately 30 water-quality related concerns regarding homeless encampments. The concerns pertained primarily to solid waste (i.e., trash and litter) and human waste accumulating on property within the city near local streams. The SWMP submitted with the MS4 permit renewal does not adequately address the potential for solid waste, pathogens, and other pollutants from these areas to enter local streams and waterways. Additional details and mitigation measures are needed in the SWMP and MCM 3 to ensure these areas do not pose a threat to water quality and MS4 infrastructure.

The department understands that homeless encampments are a result of complex social, economic, and mental-health related issues. However, solid and human waste generated from these areas can significantly contribute to pollution and water quality impacts in MS4 service areas. These impacts are potential violations of the co-permittee MS4 permit and must be addressed in the updated SWMP, as part of the permit renewal process.



Erin Keys, P.E.
Page Two

The Water Protection Program and its staff stand ready to assist the city with these updates. If you should have questions regarding this request, please don't hesitate to contact me at (573) 522-9912 or john.hoke@dnr.mo.gov, or Aaron Nickolotsky, MS4 Coordinator, at (573) 526-1503 or aaron.nickolotsky@dnr.mo.gov or. Thank you for your cooperation and attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "John Hoke". The signature is fluid and cursive, with the first name "John" being larger and more prominent than the last name "Hoke".

John Hoke, Director
Water Protection Program

JH:kw

c: NERO, Boone County, MU, file