

**From:** [DNR Clean Water Permits](#)  
**To:** [Keys, Erin](#)  
**Cc:** [anbf2f@missouri.edu](mailto:anbf2f@missouri.edu); [Cross, Jacob](#); [DNR.MS4](#); [Wright, Sarah](#)  
**Subject:** MS4 Stormwater Management Plan MO-0136557  
**Date:** Friday, May 30, 2025 2:47:00 PM  
**Attachments:** [image001.png](#)  
[mo0136557-boone-co-columbia-umc-ms4-20250530-swmp-review-letter-boone-cw.pdf](#)

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Good afternoon,

Please see the enclosed correspondence regarding the MS4 Stormwater Management Plan for MO-0136557.

Operating Permits Section – MS4 Unit  
Water Protection Program  
Missouri Department of Natural Resources  
Jefferson City, MO 65102-0176



May 30, 2025

ATTN: 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) Stormwater Management Plan (SWMP)  
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 has reviewed the draft revisions to Minimum Control Measure (MCM) 3 of the SWMP submitted by Alec Brown on behalf of the MS4 co-permittees. Revisions to MCM 3 were requested by the department in a February 28, 2025, letter to the city, and during the March 7, 2025, meeting between the department and MS4 co-permittees.

The department appreciates the co-permittee's response and attention to this matter; however, more details are needed for the department to approve the SWMP. The updated "illegal encampment/ dumping" language found in the MCM 3 Discussion paragraph and in Section 3.A of the MCM 3 – Illicit Discharge Detection and Elimination (IDDE) portion of the SWMP lack specifics in the areas of measurable goals, outcomes, tracking methodology, and potential partnerships or collaborations.

Please provide a more robust update of the MCM 3 portion of the SWMP, including such items as IDDE metrics for managing solid and human waste from homeless encampments (e.g., timeframes engaged when illegal encampments or dumping are encountered; number of abatements and cleanups, along amount of trash removed; measures taken to mitigate re-encampment, etc.) Additionally, please provide details and explanation of what partnerships (e.g., non-profits, healthcare professionals, etc.) and collaborations (e.g., law enforcement, health department, parks department, governmental agencies, etc.) are being implemented to address homeless encampments in general and their impacts on water quality.

Measurable goals in a Stormwater Management Plan must contain descriptions of actions to be taken, what is anticipated to be achieved by each goal, and the frequency for such actions to be taken. Terms and conditions must be expressed in clear, specific, and measurable terms which may include narrative, numeric, or other types of requirements such as implementation of specific tasks or best management practices, performance requirements, schedules for

implementation and maintenance, and frequency of actions. Several cities have implemented encampment management and mitigation programs that contain such details, with the city of San Jose, California being one of the more detailed and holistic programs.

Please submit an updated draft Stormwater Management Plan for MCM 3 by June 30, 2025, to [MS4@dnr.mo.gov](mailto:MS4@dnr.mo.gov) or by mail at Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, MO 65102-0176.

If you have any questions, or if you would like to schedule a meeting to discuss the Stormwater Management Plan in greater detail, please contact Sarah Wright of my staff by phone at 573-526-1139, or by email at [sarah.wright@dnr.mo.gov](mailto:sarah.wright@dnr.mo.gov).

Sincerely,

WATER PROTECTION PROGRAM

A handwritten signature in black ink, appearing to read "John Hoke", written in a cursive style.

John Hoke  
Director

JH:jl

Enclosure

c: Alec Brown, [anbf2f@missouri.edu](mailto:anbf2f@missouri.edu)