

**Comments from the City of Evanston and the City of Chicago  
on the CAWS UAA**

**Stefanie Diers - Comments on the Chicago Area Waterways User Attainability Analysis Draft Report**

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**From:** "Lupton, Stephen F." <stephen.lupton@honeywell.com>  
**To:** Rob Sulski <Rob.Sulski@epa.state.il.us>  
**Date:** 4/14/2005 9:20 AM  
**Subject:** Comments on the Chicago Area Waterways User Attainability Analysis Draft Report

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April 14<sup>th</sup>, 2005

Rob Sulski  
UAA Project Manager  
Division of Water Pollution Control  
Bureau of Water  
Illinois EPA  
9511 West Harrison Street  
Des Plaines, IL, 60016

**Evanston Resident Response to the Draft UAA Report**

Dear Mr. Sulski:

The Chicago Area Waterways UAA draft report released on the Chicago Area Waterways website, [www.chicagoareawaterways.org](http://www.chicagoareawaterways.org) report highlights a number of concerns with regards to the current water quality of the North Shore Channel but does propose a number of potential remedial actions. The section of the report that deals with the NSC begins on page 4-24. The report shows that dissolved oxygen is a severe problem with regards to the channel water quality. Figure 4-7, p. 4-26 The DO in the Channel does not meet the proposed criteria most of the time. This is severely limiting to the diversity of aquatic life. Figure 4-14, p. 4-37 shows that the diversity of fish species in the channel has dramatically declined between 1993 and 2002.

What is of most interest to the users of the channel, however, and one of the my greatest concerns is the data for bacterial contamination. This information is illustrated in Figures 4-10, p. 4-29 and figure 4-11, p. 4-30. It shows that the level of *E.coli* in the North Shore Channel rarely meets secondary use standards, 1030 *E. coli*/100 ml, and often exceeds even the recreational navigation standard of >2470 *E.coli*/100 ml. This means that the channel is potentially unsafe for canoeing much of the time. The contamination is particularly severe near where the undisinfected North Shore treatment plant discharges into the channel at Howard street. Down stream of Howard the water exceeds recreational navigation standards virtually 100% of the time (this means that people should not even be using power craft here). It is ironic that this is near the new Dammrich Rowing Center. The water quality at Oakton where the Dammrich center is located is often out of compliance for both recreational navigation as well as limited secondary contact.

Some other parameters such as pH and metals are also of concern and have implications for the consumption of fish taken from the channel (not recommended for human consumption) but it is the bacterial contamination that is the most important issue in our opinion has it directly

impacts the health and safety of the current channel users.

The report outlines remedial actions that could be taken to mitigate the poor water quality of the Channel. These are outlined in Figure 6-1, p. 6-4. They include disinfection of the North side treatment plant discharge, in-stream aeration and flow augmentation. The strategies to achieve this are outlined on page 6-5 and do include communities like Evanston and Skokie implementing control systems to reduce or treat CSO discharges into the channel ( item g)). The report also highlights the arguments that the "stakeholders", e.g. MWRDGC have against implementing these remedial actions, p. 6-2. However, since the channel is being utilized with MWRDGC's consent and is being promoted as a recreational resource by communities like Skokie and Evanston, it's my opinion that these arguments have to be weighted against public risk.

The report highlights the fact that the North Shore Channel, one of the most actively used sections of the entire Chicago Area Waterways System (CAWS) is also the section most heavily contaminated with potentially pathogenic bacteria derived from CSO discharge and especially the undisinfecting discharge from the North Side Treatment Plant.

Section 4.2.5, Letter Response, states *"As part of this UAA study, IEPA requested from communities along the North Shore Channel if they had any plans for in stream habitat improvements or the development of swimming areas. The cities that responded did not have any long-range plans for development in the North Shore Channel."* However, it's my understanding that the City of Evanston did reply with a response that contained the following *"The current water quality of the channel and the designation of the UNSCh as limited contact recreation limits the current utilization options to non-contact usage. Over the long term the City of Evanston would like to see improvement in the water quality to eventually allow full contact recreation so that the full recreation potential of the channel could be realized. This would allow access to the channel for fishing and water contact activities such as wading, swimming and "floating" on inflatables. This would represent a significant increase in recreational resources for the communities in the socially disadvantaged areas of western Evanston."*

I should also like to note that the City of Evanston has included the North Shore Channel in its Capital Improvement Plan.

[www.cityofevanston.org/departments/communitydevelopment/planning/pdf/north\\_shore.pdf](http://www.cityofevanston.org/departments/communitydevelopment/planning/pdf/north_shore.pdf)

Sincerely,

Steve Lupton  
1325 Monroe St.  
Evanston, IL, 60202

April 15, 2005

Rob Sulski  
UAA Project Manager  
Division of Water Pollution Control  
Bureau of Water  
Illinois Environmental Protection Agency  
9511 West Harrison Street  
Des Plaines, IL, 60016

**RE: City of Evanston's Response to IEPA's Draft UAA Report**

Dear Mr. Sulski:

By way of this letter, the City of Evanston Environment Board would like to comment on the Illinois Environmental Protection Agency's ("IEPA") Draft Use Attainability Analysis ("UAA") Report for the Chicago Area Waterway System ("CAWS"), which was issued in November of 2004. Specifically, these comments are aimed at the portions of the UAA Report addressing the North Shore Channel ("Channel"), from its northern most point located at MWRDGC's Wilmette Harbor and Diversion structure at Lake Michigan, to its southern crossing into the City of Chicago near the intersection Howard Street and McCormick Boulevard (approximately seven City blocks north of its confluence with the North Branch of the Chicago River). These comments were prepared and officially approved by the Evanston Environment Board for submittal to IEPA.

To begin with, the Evanston Environment Board agrees that the outflow from the MWRDGC's Northside WRP into the North Shore Channel near Howard Street, coupled with reduced discretionary diversion from the Lake Michigan at the Channel's northern-most point has resulted in a low-flow of Channel water downstream. See AUU Report, Section 3.1.1.7. This low-flow is characterized in the UAA Report as creating a "stagnant situation." *Id.* This stagnant situation has led to insufficient dissolved oxygen water content and increased levels of bacteria. These conditions, in turn, have resulted in the IEPA designating the portion of the Channel as "limited contact recreation" which essentially prohibits fishing and limiting other recreational activities on the Channel to those where little actual dermal water contact is likely to occur.

The above situation in the Channel is clearly the result of low water flow rates, in which the stretch of the Channel that runs through the City of Evanston has essentially become a wide, shallow, bathtub. The Evanston Environment Board is very concerned about this and hopes that the IEPA will take remedial steps aimed at a long-term remedy. As indicated in our previous letter to you from the Evanston City Manager, the Environment Board believes that remedial actions should be investigated including primarily a combination of aeration and

flow augmentation to return the Channel to a flowing status. While we are encouraged by the Draft UAA Report's discussion of disinfection as a potential remedial action which could improve Channel water quality, we also believe that disinfection should be viewed as a partial solution. Accordingly, the Evanston Environment Board encourages the IEPA to give more consideration to aeration and flow augmentation remedial actions, which, in turn will have positive long term effects on the canal ecosystem. We believe that aeration and flow augmentation are far superior to those offered by simple disinfection alone.

We would also like to reiterate Evanston's long-range plans for development in the North Shore Channel. Section 4.2.5 of the UAA Report states that no communities along the North Shore Channel have indicated, in response to an IEPA request, any long range plans for future development of the North Shore Channel. On the contrary, as part of the City's previous response to that particular IEPA inquiry, we specifically indicated that, while poor water quality currently limits utilization options to non-contact usage, "over the long term the City of Evanston would like to see improvement in the water quality to eventually allow full contact recreation so that the full recreation potential of the channel could be realized. This would allow access to the channel for fishing and water contact activities such as wading, swimming and floating on inflatables. This would represent a significant increase in recreational resources for the communities in socially disadvantaged areas of western Evanston." In other words, remedial activities to increase Channel water quality will drive the extent to which the City can institute its long-range plans for future development of the Channel as a source of recreation, which it would very much like to pursue.

Furthermore, one of the City of Evanston's greatest concerns regarding water quality in the North Shore Channel is the level and extent of bacterial contamination. According to the Draft UAA Report, the North Shore Channel, one of the most actively used sections of the entire CAWS, is also the section most heavily contaminated with potentially pathogenic bacteria. Data contained in Figures 4-10, p. 4-29 and figure 4-11, p. 4-30 of the Report illustrate that the level of E.coli in the North Shore Channel rarely meets secondary use standards, 1030 E. coli/100 ml, and often exceeds even the recreational navigation standard of >2470 E.coli/100 ml. This means that despite its classification of "limited contact recreation" the Channel is potentially unsafe for canoeing much of the time. While some of this contamination is undoubtedly derived from CSO discharge, the contamination is particularly severe near where the North Shore treatment plant discharges undisinfectated effluent into the Channel at Howard Street. Downstream of Howard the water exceeds recreational navigation standards virtually 100% of the time, which means that people should not even be using power craft in this area. We would also like to mention that the new Dammrich Rowing Center is located near this area. The water quality at Oakton where the Dammrich center is located is often out of compliance for both recreational navigation as well as limited secondary contact.

Some other parameters such as pH and metals are also of concern and have implications for the consumption of fish taken from the channel, which are not recommended for human consumption. But it is the bacterial contamination that is of the greatest concern to the Environment Board since it directly impacts the health and safety of the current channel users.

Since dissolved oxygen levels in the Upper North Shore Channel between the Wilmette locks and the Howard Street discharge are cited as the key parameter affecting the environmental health of this waterway, we are somewhat encouraged by the Report's discussion of potential remedial action which could be taken to mitigate the poor water quality of the Channel. These remedial actions, which are outlined in Figure 6-1, p. 6-4, include disinfection of the North side treatment plant discharge, in-stream aeration and flow augmentation. In stream aeration could be a separate system that brings oxygen into the water with small turbines or be combined with flow augmentation to aerate large quantities of stormwater runoff.

In addition, we would like to improve the quality of that runoff and expand the drainage area. Evanston currently diverts a portion of our stormwater directly into the channel and could eventually increase the portion of our surface runoff and improve the quality of that runoff entering the channel by the use of wetland "filters" that use aquatic vegetation and small ponds to filter sediment, silt and other solids. This approach has been successful in other parts of the CAWS and will provide the best and most cost effective long term solution to reducing the bacterial contamination by increasing the level of dissolved oxygen and promoting rapid breakdown of accumulated bio-solids, as well as reducing the volume of water required to be treated at a major storm event.

We note that the Report p. (p. 6-2) also highlights arguments that the "stakeholders" such as MWRDGC have made against implementing these remedial actions. However, since the Channel is being utilized with MWRDGC's consent and is being promoted as a recreational resource by communities like Skokie and Evanston, we believe that these "stakeholder" arguments must be viewed in light of, and weighed against, the very real potential of a public health risk if no remedial action is taken.

Sincerely,



Derek Supple  
Chairman  
City of Evanston Environment Board



City of Chicago  
Richard M. Daley, Mayor  
Department of Water Management

Richard A. Rice  
Commissioner

Jardine Water Purification Plant  
1000 East Ohio Street  
Chicago, Illinois 60611  
(312) 744-7001  
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[www.cityofchicago.org/  
watermanagement](http://www.cityofchicago.org/watermanagement)

March 31, 2005

Mr. Scott Twait  
Illinois Environmental Protection Agency  
Bureau of Water  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

Dear Mr. Twait:

Thank you for the opportunity to comment on the Draft Chicago Area Waterway Use Attainability Analysis. The City has been pleased with the quality of work to date and has found real value in the partnerships that have been forged on the Stakeholder Advisory Committee. The City supports the UAA process as an important step in achieving a vision that we all desire for our waterways. Toward that end, we offer the following general statement about the process, as well as specific comments to the report.

As noted in the report, the City of Chicago has made many improvements to revitalize Chicago Area Waterways. Dozens of acres of new parkland and several miles of bicycle trails and walking paths have been developed. Riverbanks by parks, schools and residential neighborhoods have been restored to reduce erosion and improve wildlife habitat. The City is committed to continued improvements to water quality, wildlife habitat, and public amenities on the Chicago Area Waterways.

In the coming months, the Illinois Environmental Protection Agency (IEPA) will move forward on the important next steps of evaluating the economic and social impacts of recommendations in the report. We encourage IEPA to demonstrate the same efficiency and dedication to completing these steps as was shown in developing the draft report. The City of Chicago is committed to continuing our participation in this process as part of the Stakeholder Advisory Committee.

It is important that the recommendations in the report be framed in the context of the timeline of the overall UAA process. The City reminds participants that the recommendations contained in the report have been made without the economic and social impact analysis that is necessary to determine their feasibility. This analysis is an important step in the UAA process.

More specifically, the report suggests the treatment of combined sewer overflows in order to address pollution concerns prior to completion of the Tunnel and Reservoir Project (TARP). Although addressing pollution



concerns in the short term is clearly desirable, adequate analysis must be made to determine the most feasible and economically responsible approach to this issue.

If a strategic plan is included in the final report, the strategies must include an explanation and plan for seeking funding for local governments to implement necessary infrastructure improvements. Outside of the work of the UAA, the City has committed resources to addressing CSOs. However, to adequately deal with this issue, a more significant investment must be made at the federal level. The City continues to push for funding for State Revolving Funds and the completion of TARP. Any strategies in the report should contain similar funding ideas and goals.

Detailed comments compiled from multiple City of Chicago departments are attached.

Sincerely,



Richard Rice  
Commissioner  
Department of Water Management



N. Marcia Jiménez  
Commissioner  
Department of Environment

## City of Chicago Detailed Comments on the Draft UAA Report

### Page Comment

- 1-18 If a strategic plan will be included, the strategies should be prioritized. For example, items e) (E. coli Sampling), h) (Water Quality Standards), b) (Costs of Disinfection), c) (Economic Analysis), i) (Water Quality Modeling) and g) (Mandated Action) should be prioritized and conducted in that order.
- 1-18 Item g): Revise last part "...events, provided that such requirements have been demonstrated to be economically feasible and environmentally beneficial in view of commitments to complete TARP."
- 1-19 Item b) should be eliminated. It is redundant in that it is already covered by item c).
- 1-19 Item c) Revise last part "...events, provided that such requirements have been quantitatively demonstrated to be economically justifiable and environmentally beneficial in view of commitments to complete TARP."
- 1-21 Item j) at the top of the page and b) at the bottom of the page: Note that the City of Chicago is working with other stakeholders and the University of Illinois at Chicago to develop a pilot project to test capping and bioremediation technology for sediment in the South Fork.
- 2-4 Revise first full paragraph with no bullet point: The City of Chicago is conducting an investigation to **characterize and verify CSOs and prioritize remedial measures.**
- 3-4 3.1.1.1 The North Avenue Turning Basin is not in the Sanitary and Ship Canal.  
A canoe launch is not proposed between Pulaski and Kedzie.  
The Chicago Park District is building a motorized boat launch at Western Avenue, not at Kedzie (see Park District comments).  
The park and river-edge path at the Chicago Sun Times facility is complete.
- 3-6 3.1.1.2 In addition to Chinatown, the South Branch of the Chicago River runs through McKinley Park, Bridgeport, Armour Square, Lower West Side (Pilsen), Near South Side and the Loop. The South Fork divides McKinley Park and Bridgeport.  
There is not a park named Chinatown Park. The City does not plan to develop a canoe launch at the existing Ping Tom Park. Canoe access is proposed for future park development north of 18<sup>th</sup> Street.

3.1.1.3 Land use on the South Fork north of 35<sup>th</sup> Street is transitioning to residential and open space. Two residential developments have been approved by the Chicago Plan Commission.

- 3-7 4<sup>th</sup> Paragraph: The City is not planning to develop a canoe launch at Origins Park or at Ashland Avenue. Canoe and rowing access is proposed for the future park at Eleanor and Fuller.

3.1.1.4 Wolf Point, at the confluence of the three branches of the river, has a “natural” riverbank (there is no seawall).

- 3-8 The Chicago River Rowing and Paddling Center is no longer located at the old Coast Guard Station. They are temporarily located at the Lake Shore Drive Bridge on the south bank of the river.

The text describing river use only mentions rowing and light barge traffic. The dominant use in this segment is tour boat and water taxi service.

3.1.1.5 Residential units on river-edge land also exist on the Chicago River, the South Branch and the South Fork. It would be more accurate to say that the North Branch is one of the few places with **single family** homes bordering the river.

- 3-9 The existing rowing facility at the North Avenue turning basin is located on private property. The City does not plan to enhance the facility. The City and the Chicago Park District are completing a canoe launch nearby at Weed St. on the North Branch Canal.

- 3-10 The City does not plan to build a boat ramp from Argyle Street to the canoe launch at West River Park. The portage path between the two canoe launches in West River Park is complete.

The City supports investigation of dam modifications at River Park for recreation and habitat enhancements, but the City has not developed any plans to create a safe run for small craft over the structure.

3.1.1.6 The waterway is called the North Branch **Canal**.

The report states that the Montgomery Ward building will contain 298 units. This is part of the Kingsbury Park development, which contains 2,000 planned residential units.

The report states that “residential developments are bringing people closer to the river where land prices are more affordable than Lake Michigan development. . .” Is there data to support this statement? Residential developments on the river are selling at premium prices.

3-18 Table 3-2 . Add an asterisk at Chicago CSO Number 231. Include table foot note:  
\*This number will be reduced pending further field investigations by the City.

3-21 3.2.1 The heading for this section is the Chicago River Corridor Development Plan, which is not discussed at all in the text of the paragraph. The text describing the plan in section 3.2.2 should be included in section 3.2.1.

Note that the City and other stakeholders have completed a great deal of planning and development work on the Chicago River system since the completion of the CitySpace Plan in 1993. Although this work has been consistent with the goals of the CitySpace program, the UAA report would provide a more accurate description of “Chicago River Programs and Projects” if it focused on the plans and programs specifically targeting the CAWs. The following additional plans and programs should be included:

1999: In conjunction with the Chicago River Corridor Development Plan, the City of Chicago passed a new ordinance mandating a 30-foot setback and public access for developments on the river. The City also adopted the Chicago River Corridor Design Guidelines and Standards. This document regulates development within the 30-foot setback zone.

2002: The Chicago Park District completed a Chicago River Master Plan that laid out strategies for increasing and improving public open space on the river.

2003: Mayor Daley announced the Chicago Water Agenda, a comprehensive vision for management of Chicago’s water resources. The City also published A Guide to Stormwater Best Management Practices, a booklet that outlines innovative ways to manage stormwater that are proven to work in Chicago.

2004: The City developed a new cost-share program for repair of private riverbanks and seawalls located in Tax Increment Finance districts. The program provides additional incentive for natural riverbank design that includes habitat enhancements.

3.2.2 Although the text of this section accurately describes City goals to create greenways in the Chicago River corridor, there is no official program known as “The Greenways Project.”

3-22 3.2.3 The following information may be useful for a more accurate description of the Calumet Area Land Use Plan and related efforts:

The basic tenets of the plan, and many of the land use designations, date back to 1985 when local residents and area activists developed a set of ideas to preserve natural areas and create recreational opportunities in Calumet. In 1997, the National Park Service recognized these planning and research activities by initiating a federal study of the Calumet area. The *Calumet Area Land Use Plan* began when the Chicago Department of Planning and Development (DPD) and the non-profit organizations, Openlands Project and the Southeast Chicago Development Commission jointly submitted a grant to the U.S. EPA under its Sustainable Development Challenge Grant program for a Calumet

plan. The role of the non-profit organizations included outreach to and representation of the local environmental and community groups. The planning partnership later included the Chicago Department of Environment (DOE) and Calumet Area Industrial Commission, a non-profit organization representing area businesses. The Illinois International Port Authority and Metropolitan Water Reclamation District of Greater Chicago own large tracts in the area and DPD worked with both agencies to get their concurrence on the land use designations.

The goal of the *Calumet Area Land Use Plan* is to create a “landscape where industry and open space are intermingled, interconnected and to the greatest extent possible, co-existing harmoniously” by:

- Improving the quality of life in the Calumet area and the surrounding communities
- Retaining and enhancing existing businesses and industries within the Calumet area
- Attracting new industrial and business development, and creating new job opportunities
- Protecting and enhancing wetland and natural areas within the Calumet area, and improve habitat for rare and endangered species.

The Chicago Plan Commission adopted the plan on February 14, 2002 and in March 2004 the associated *Calumet Design Guidelines* were adopted to the 1,000 acres of industrial land ready for redevelopment by providing direction on storm water management, slag laden soils and planting that will enhance and complement the nearby natural areas.

More than 2,200 species were identified during the 2002 Calumet Biodiversity Blitz, a 24-hour inventory of Calumet area species that involved more than 100 scientists and scores of community members and volunteers. To address habitat protection for these species, the Department of Environment published the *Calumet Area Ecological Management Strategy* in 2002 to provide a unified strategy for land managers for rehabilitating the natural areas. Since the plan was adopted, the City has acquired over 300 acres of wetlands and natural areas of statewide significance through donations, tax sales, and acquisitions using state and federal grants. The Illinois International Port District, the owner of the west shore, has agreed to dedicate that land for preservation.

- 4-44 First paragraph: Note that land use on the South Fork north of 35<sup>th</sup> Street is transitioning to residential and open space. Two residential developments have been approved by the Chicago Plan Commission.
- 4-45 The text fails to mention the intensive use of the waterway by tour boat and water taxi service.
- 5-4 Items 6 and 7: The East and West arms of the South Fork and the West Fork were filled in long ago.
- 6-5 If a strategic plan will be included, the strategies should be prioritized. For example, strategy items h) and i) should be completed before g) unless it is determined in f) that disinfection at the WRPs does not achieve dry weather bacteria standards.

6-6 Item b) should be eliminated. It is redundant in that it is included in item c).

Item c): Revise last part "...events, provided that such requirements have been demonstrated to be economically feasible and environmentally beneficial in view of commitments to complete TARP."

Item k) should be included with item e) on page 6-5 to better determine sources of bacteria (human vs. natural sources). *E. coli* is persistent in the open environment, including in the sediment and soil environment.

An additional item should be included as follows: Seek funding for local governments and entities to implement point and non-point source controls to reduce CSOs.

Items d), e) and f) should be completed before items b) or c) are considered.

6-8 Revise item j) to include capping and in-situ treatment of sediment as remediation alternatives.

## **Recreational Surveys to Local Governmental Units and Responses**

We are also interested in your organizations' existing and planned river-related, public recreational events such as: canoeing and kayaking, river-edge cleanup and restoration and other such activities.

Your earliest submission of this information within the next 30 days would be most appreciated so that we may include it in the decision-making framework of our study. Any development plans that are covered in projects governed by an NPDES permit need not be communicated to us as a part of this Use Attainability Analysis request.

The Chicago area waterways include the following waterbodies:

1. North Shore Channel from Lake Michigan to the confluence with the North Branch of the Chicago River
2. North Branch of the Chicago River from it's confluence with the North Shore Channel to its confluence with the South Branch, including the North Branch Canal along the east side of Goose Island
3. Chicago River
4. South Branch of the Chicago River, including the South Fork and navigation slips
5. Chicago Sanitary & Ship Canal, including the Collateral Channel
6. Lake Calumet and Lake Calumet Entrance Channel
7. Calumet River from Lake Michigan to the confluence with the Grand Calumet River
8. Grand Calumet River
9. Little Calumet River North Leg from its junction with the Grand Calumet River to the Calumet-Sag Channel
10. Calumet-Sag Channel

The UAA is the first in-depth evaluation of the Chicago area waterways in nearly three decades and the analysis and subsequent revisions of water quality standards will have a major impact on how the waterways can potentially be used ecologically, commercially and recreationally. Please visit [ChicagoAreaWaterways.org](http://ChicagoAreaWaterways.org) for more information on the UAA.

Thank you in advance for your participation in this effort. If you have any questions, please contact me at 847/294-4037 or via email at [rob.sulski@epa.state.il.us](mailto:rob.sulski@epa.state.il.us).

Very truly yours,

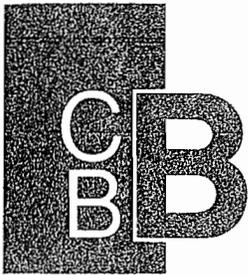


Rob Sulski  
UAA Project Manager  
Division of Water Pollution Control  
Bureau of Water

cc: Toby Frevert, IEPA  
Ronald French, CDM  
File

Letter Recipients:

Metropolitan Water Reclamation District  
Illinois International Port District  
Village of Alsip  
City of Chicago - Mayor's Office, Department of Planning and Development,  
Department of Environment, Department of Water Management  
Chicago Park District  
Cook County Forest Preserve District  
DuPage County Forest Preserve District  
Will County Forest Preserve District  
Village of Wilmette  
Wilmette Park District  
Village of Skokie  
Skokie Park District  
City of Evanston  
Village of Palos Hills  
Village of Worth  
Village of Palos Park  
Village of Lincolnwood  
Lincolnwood Park District  
Village of Dolton  
Dolton Park District  
Calumet City  
Calumet Memorial Park District  
Village of Burnham  
City of Blue Island  
Village of Summit  
Village of Bedford Park  
Village of Justice  
Village of Stickney  
City of Cicero  
Town of Forest View  
Village of Summit  
Village of Hodgkins  
Village of Summit  
Village of Willow Springs  
Village of Lemont  
City of Romeoville



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July 28 2004

Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P. O. Box 19276  
Springfield, Illinois 62794

Attention: Mr. Rob Sulski

Subject: Palos Hills, Chicago Area Waterway System  
Use Availability Analysis (UAA)

Dear Mr. Sulski:

On behalf of the City of Palos Hills, I am responding to your letter dated May 31, 2004. The City of Palos Hills has no plans within a ten year horizon for the waterways or the land adjacent to those waterways identified in your letter. They are also not aware of any private sector plans within the City limits for the areas noted above.

Should you have any further questions on this matter, please direct them to Mr. George Lutz at the City of Palos Hills.

Sincerely,

Dave Vandervelde, PE  
Senior Civil Engineer

Cc: George Lutz, City of Palos Hills

**RECEIVED**  
AUG 2 2004

Div. Water Pollution Control  
Field Operations Section-Reg. 2

**From:** "Bob Porter" <Bob-Porter@lemontparkdistrict.org>  
**To:** <rob.sulski@epa.state.il.us>  
**Date:** 7/8/2004 7:51:36 AM  
**Subject:** Request for information

I received the letter you forwarded to the Lemont Park District regarding issues including modification or restoration of waterway channels and others issues as it relates to recreation and commercial opportunities. The park district has no application these issues. Any questions, please contact me. Thank you.

Robert A. Porter

Director of Parks & Recreation



# VILLAGE OF WILMETTE

1200 Wilmette Ave.  
WILMETTE, ILLINOIS 60091-0040

OFFICE OF  
THE MANAGER

June 14, 2004

(847) 251-2700  
FAX (847) 853-7700  
TDD (847) 853-7634

Rob Sulski  
IEPA  
UAA Project Manager  
James R. Thompson Center  
100 West Randolph, Suite 11-300  
Chicago, IL 60601

Dear Mr. Sulski:

In response to your request regarding waterway related development plans underway, I have enclosed a site plan indicating where the proposed bikeway/pedway will run through the Village of Wilmette. Please note that the multi-purpose path will be adjacent to the Wilmette Harbor (Lake Michigan) and the North Shore Channel.

If you have any questions about this project, please contact Director of Engineering Brigitte Mayerhofer at either 847-853-7627 or [mayerhoferb@wilmette.com](mailto:mayerhoferb@wilmette.com).

Sincerely,

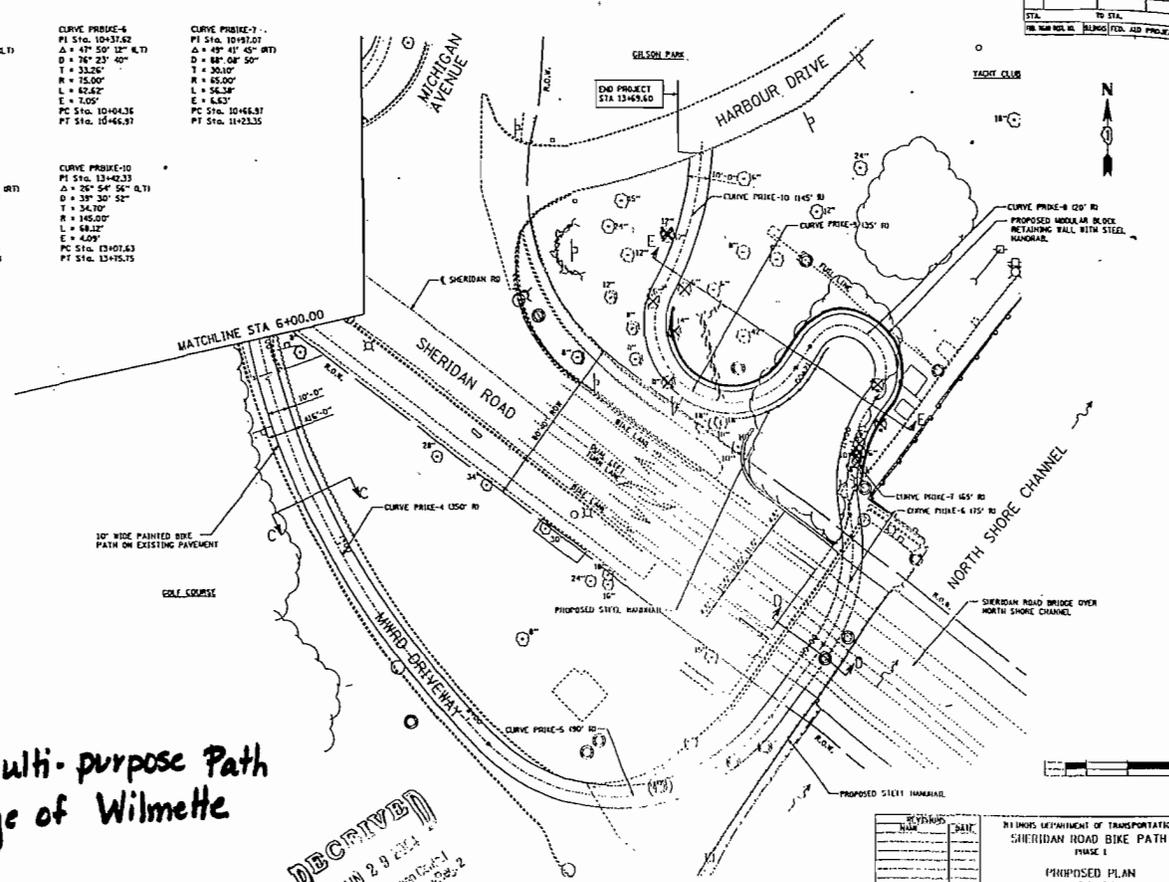
Michael J. Earl  
Village Manager

cc: Brigitte Mayerhofer

**RECEIVED**  
JUN 29 2004  
Div. Water Pollution Control  
Field Operations Section-Reg. 2

APP. NO.	SECTION	COUNTY	INSTR. NO.	SHEET NO.

<p><b>CURVE PRBDC-4</b>          PI Sta. 7408.13  <math>\Delta = 15^\circ 10' 01''</math> 0.71  <math>D = 16^\circ 27' 13''</math>  <math>T = 112.60'</math>  <math>R = 350.00'</math>  <math>L = 217.89'</math>  <math>E = 17.67'</math>          PC Sta. 5496.52          PT Sta. 814.41</p>	<p><b>CURVE PRBDC-5</b>          PI Sta. 9412.30  <math>\Delta = 95^\circ 10' 23''</math> 0.71  <math>D = 63^\circ 39' 43''</math>  <math>T = 98.50'</math>  <math>R = 90.00'</math>  <math>L = 149.50'</math>  <math>E = 43.44'</math>          PC Sta. 814.41          PT Sta. 9462.31</p>	<p><b>CURVE PRBDC-6</b>          PI Sta. 10431.82  <math>\Delta = 47^\circ 50' 18''</math> 0.71  <math>D = 76^\circ 23' 40''</math>  <math>T = 33.26'</math>  <math>R = 75.00'</math>  <math>L = 82.62'</math>  <math>E = 7.05'</math>          PC Sta. 10404.36          PT Sta. 10466.97</p>	<p><b>CURVE PRBDC-7</b>          PI Sta. 10497.07  <math>\Delta = 48^\circ 41' 02''</math> 0.71  <math>D = 88^\circ 04' 50''</math>  <math>T = 30.00'</math>  <math>R = 65.00'</math>  <math>L = 56.38'</math>  <math>E = 6.52'</math>          PC Sta. 10466.97          PT Sta. 11233.35</p>
<p><b>CURVE PRBDC-8</b>          PI Sta. 15402.85  <math>\Delta = 185^\circ 02' 01''</math> 0.71  <math>D = 286^\circ 28' 44''</math>  <math>T = 379.50'</math>  <math>R = 20.00'</math>  <math>L = 54.84'</math>  <math>E = 400.02'</math>          PC Sta. 11423.35          PT Sta. 11483.29</p>	<p><b>CURVE PRBDC-9</b>          PI Sta. 22459.31  <math>\Delta = 176^\circ 13' 00''</math> 0.71  <math>D = 183^\circ 42' 08''</math>  <math>T = 1,059.72'</math>  <math>R = 35.00'</math>  <math>L = 107.14'</math>  <math>E = 1,023.31'</math>          PC Sta. 11499.99          PT Sta. 13407.83</p>	<p><b>CURVE PRBDC-10</b>          PI Sta. 13142.33  <math>\Delta = 26^\circ 54' 56''</math> 0.71  <math>D = 39^\circ 30' 52''</math>  <math>T = 34.10'</math>  <math>R = 145.00'</math>  <math>L = 68.22'</math>  <math>E = 4.09'</math>          PC Sta. 13107.83          PT Sta. 13195.75</p>	



**Proposed Multi-purpose Path  
 Village of Wilmette**

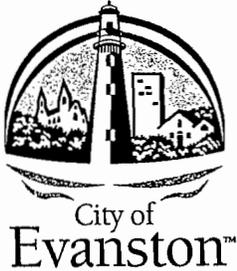
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 JUN 29 2004  
 CIV. WORKS DIVISION  
 FIELD OPERATIONS SECTION

NO.	DATE	DESCRIPTION

ILLINOIS DEPARTMENT OF TRANSPORTATION  
 SHERIDAN ROAD BIKE PATH  
 PHASE 1  
 PROPOSED PLAN  
 SHEET 2 OF 2

SCALE: 1" = 20' 0"

DRAWN BY: MFC  
 CHECKED BY: [ ]



2100 Ridge Avenue  
Evanston, Illinois 60201-2798  
T 847.328.2100  
TTY 847.328.4080  
[www.cityofevanston.org](http://www.cityofevanston.org)

September 14, 2004

Rob Sulski  
UAA Project Manager  
Division of Water Pollution Control  
Bureau of Water  
Illinois EPA  
9511 West Harrison Street  
Des Plaines, IL, 60016

**Subject: City of Evanston's Response to Planned Recreational use of the Upper North Shore Channel**

Dear Mr. Sulski:

The City of Evanston ("City") regards the Upper North Shore Channel ("Channel") as an important recreational resource for its residents, as well as surrounding communities. Over the last few years, the City has noticed a considerable increase in use of the Channel by canoeists, kayak boaters, and surrounding high school and college crew/rowing teams. The City's Parks/Forestry & Recreation Department now sponsors canoeing activities on the Channel through the Evanston Ecology Center programs. The Evanston Ecology Center and Ladd Arboretum, as a coalition, maintain the public parkway along the Channel and promote its conservation. The parkway itself is easily accessible from all parts of Evanston and is a wonderfully-maintained open space used for walking, jogging, and biking. Throughout the year environmental educators from the Ecology Center offer basic instruction in canoeing and guide Channel canoe tours, pointing out the flora and fauna of the region. Experienced canoe and kayak boaters can now launch their own vessels down-Channel at the relatively-new Skokie Channel side Park, located north of Oakton and ½ block east of McCormick Boulevard.

The City is currently looking for ways to further promote usage of the Channel for recreational activities. In this regard, some of the short-term improvements under consideration for inclusion in the City's Capital Improvement Plan (CIP) are as follows:

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Div. Water Pollution Control  
Field Operations Section Box 2

- Improvements to bike paths on the eastern bank of the Channel. This could include directing bike paths under the roadway bridges across the Channel so that bikers can avoid crossing busy roads such as Emerson, Church and Dempster streets.
- Establishing nature paths and overlooks along the banks of the Channel that will enhance opportunities for wildlife viewing and study.
- Establishing piers and improved canoe access for disabled persons and the elderly (an important consideration for an aging population).

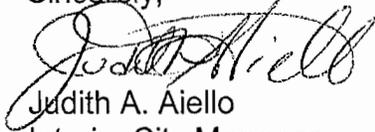
The measured water quality of the Channel as "limited contact recreation" limits the City's current utilization options to non-contact usage. Over the long term, the City of Evanston would like to see improvement in the water quality to eventually allow full contact recreation so that the recreation potential of the channel could be fully realized. Such a re-designation would allow access to the Channel for fishing and water contact activities such as wading, swimming and "floating" on inflatables. This would represent a significant increase in recreational resources for the communities, especially in the moderate-income residential areas of western Evanston.

In order to achieve this long-term goal of re-designation, the City realizes that the current measured water quality of the Channel will have to be significantly improved. Therefore, the City of Evanston strongly supports the recommendations in the IEPA Chicago Area Waterway System UAA to improve the water quality in the channel by implementation of the following steps:

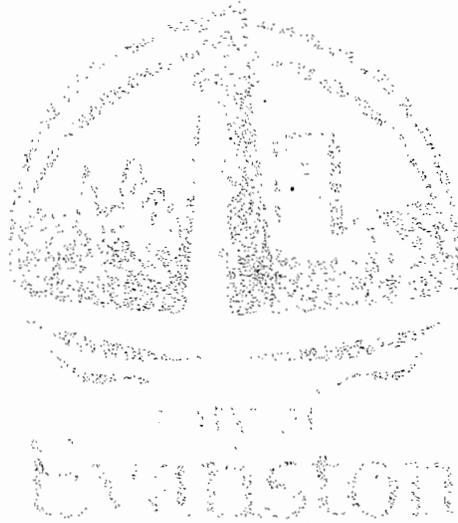
1. Increasing the flow of the Channel by diversion of a portion of the MWRD's Skokie Plant effluent to the head of the Channel as well as by introducing screened surface stormwater runoff.
2. Introducing supplemental artificial water aeration through cascading weir or other proven methods.
3. Implementing a non-residual disinfection process for the MWRD Skokie plant discharge.
4. Channel bank improvements to encourage growth of emergent aquatic vegetation. The use of constructed wetland treatment of surface storm water runoff only (as opposed to combined sewer and stormwater discharge) would greatly improve wildlife habitat as well as water quality in the channel.

The City of Evanston, with the support of the Evanston Environment Board, is currently developing a public educational program for the Evanston community to increase the awareness of the educational and recreational potential of the Upper North Shore Channel and to promote its usage for such purposes.

Sincerely,



Judith A. Aiello  
Interim City Manager





7000 West 46th Street  
Forest View, Illinois 60402  
(708) 788-3429  
(708) 788-8266 Fax

**Village President**  
Richard S. Grenvich  
**Trustees**  
Richard M. Hubacek  
Dennis W. Tetens  
Linda Mladek  
Lawrence Powell  
Mike Grossi  
James Sudkamp

June 7, 2004

Mr. Rob Sulski  
UAA Project Manager  
Division of Water Pollution Control  
Illinois EPA  
9511 West Harrison Street  
Des Plaines, IL. 60016

Dear Mr. Sulski:

Per your attached inquiry, please be advised that the Village of Forest View has no waterway related development plans underway over the next ten year period. In addition we have no existing or planned river-related public recreational events.

Sincerely,

Frank Yurka  
Village Administrator

attach:

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JUN 9 2004

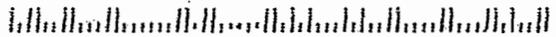
Dir. Water Pollution Control  
Field Operations Section-Reg. 2

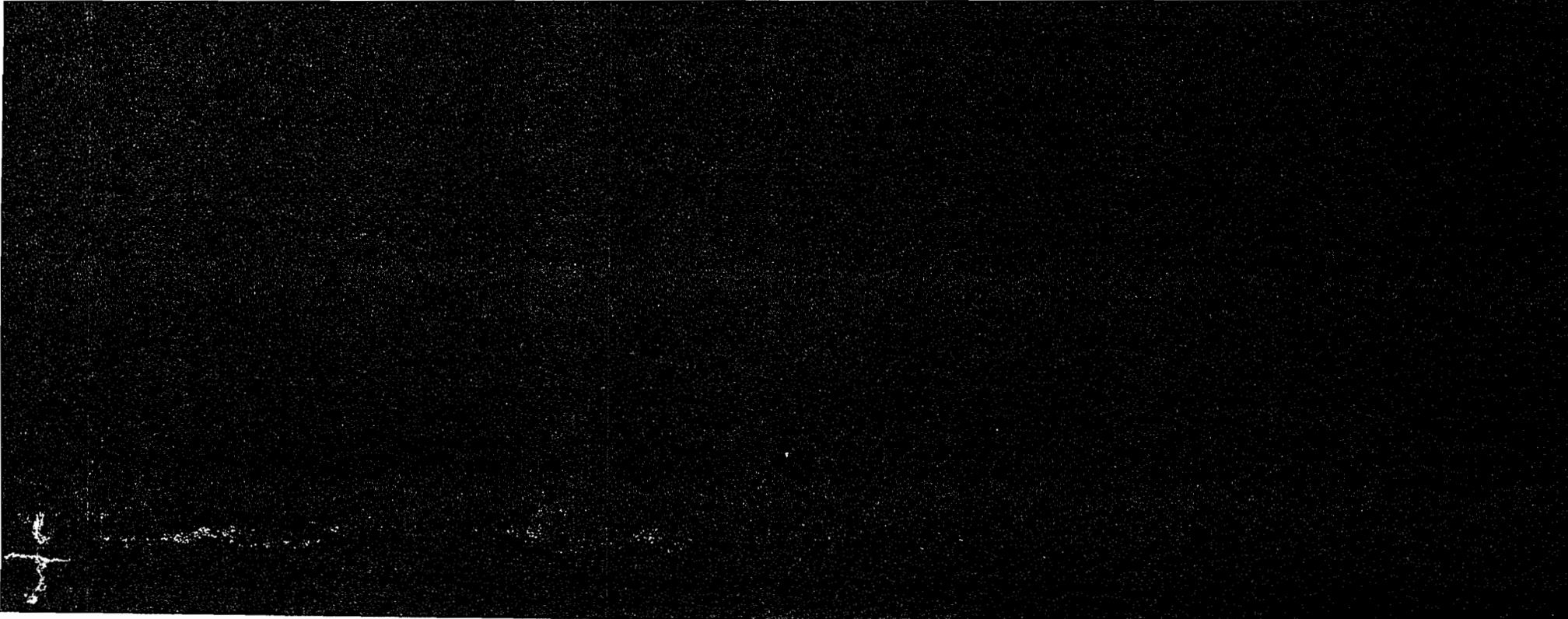
VILLAGE OF FOREST VIEW

7000 W. 46TH STREET  
FOREST VIEW, ILL. 60402



MR. ROB SULSKI  
UAA Project Manager  
Division of Water Pollution Control  
Illinois EPA  
9511 West Harrison Street  
Des Plaines, IL. 60016

60016+1523 



# CPD / CITY

Boat Launches on Chicago Riverway

Existing

RIVER PARK

CLARK PARK

Weed ST.

2004/2005 construction

PARK 526 (Lincoln Village) (Lincoln Ave)

PARK 530 S. Western Ave / CSSC (Motorized + Non Motorized)

Planning For Future, no time set

PING TOM PARK, North of 18<sup>TH</sup> ST.

BOB FOSTER, CPD

# Protecting Our Water Environment

## BOARD OF COMMISSIONERS

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## Metropolitan Water Reclamation District of Greater Chicago

100 EAST ERIE STREET CHICAGO, ILLINOIS 60611-3154 312-751-5600

John C. Farnan, P.E.  
*General Superintendent*

July 12, 2004

312-751-7900 FAX 312-751-5681

Mr. Rob Sulski, Project Manager  
Illinois Environmental Protection Agency  
9511 West Harrison  
Des Plaines, IL 60016

Dear Mr. Sulski:

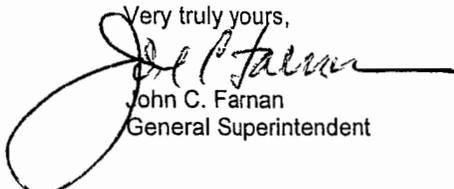
Subject: Request for Information

This responds to your letter dated June 16, 2004, requesting plans that would have an impact on the Chicago Area Waterways and be useful to the Illinois Environmental Protection Agency for the Use Attainability Analysis (UAA) Study. The Metropolitan Water Reclamation District of Greater Chicago (Chicago) has no plans for developments that fit the description outlined in your letter. However, we wish to inform you of the following:

- North Branch Canal. The District has discussed the possibility of our participation with the City of Chicago (City) in a project to create a wetland out of the current canal. Since the canal is City-owned and the only known permitted discharges to the canal are from five combined sewer overflow outfalls owned by the City, the District is taking a subordinate role in promoting this project. We believe that this project would have some marginal benefits in improving water quality in the North Branch of the Chicago River.
- South Fork of the South Branch. As you are aware, we have studied the benefit of inducing artificial flow in this reach to improve water quality. Chicago has engaged the Chicago District, U.S. Army Corps of Engineers (Corps) to investigate improvement of this reach. However, Corps resources to proceed with this work are limited and the District will include this work in the Scope of Work for the North Side Water Reclamation Plant Master Plan Study.
- The District does not undertake recreational improvements on property it owns along the waterways. However, we do lease property for this purpose. Recreational improvements have been made at numerous locations, as you well know. At present, the only known plans of potential recreational/residential developments on District-owned property is in the vicinity of Lemont. In addition, the Chicago Park District is planning the installation of a boat ramp at Western Avenue on the Chicago Sanitary and Ship Canal (CSSC).
- The following is a list of pending plans for use of District property in or along the waterways.
  1. Army Corps of Engineers – Fish barrier in Romeoville, north of 135<sup>th</sup> Street on the CSSC
  2. Chicago Park District – Bike paths on east and west side of North Shore Channel, from Lawrence to Devon Avenue
  3. At Route 83, east of Cicero Avenue on the Calumet-Sag Channel, the Illinois Mining Company is removing spoil, and the IL Tollway Authority has an easement there for construction on I-294
  4. Bank stabilization project at 3014 W. 41<sup>st</sup> (Main and Collateral Channels of the CSSC)

If you have any questions, please contact Richard Lanyon, Director of Research and Development at 312-751-5190.

Very truly yours,

  
John C. Farnan  
General Superintendent

RL:dl

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JUL 13 2004  
Div. Water Pollution Control  
Field Operations Section-Res

June 15, 2004

Mr. Robert Sulski  
UAA Project Manager  
Division of Water Pollution Control  
Bureau of Water  
Illinois Environmental Protection Agency  
Email: [rob.sulski@epa.state.il.us](mailto:rob.sulski@epa.state.il.us)

Re: Chicago Area Waterway System Use  
Attainability Analysis (UAA)

Dear Mr. Sulski:

Please be advised that the District does not own, manage or plan to utilize any of the listed waterways. Thank you for your interest. If I can be of any further assistance, please let me know.

Sincerely,

Timothy W. Good  
Planning Program Supervisor

cc: District file; Misc/County/00-EP/Chicago Area Waterways/IEPA 06-15-04



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397  
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

May 14, 2004

President Ronald Robison  
Village of Bedford Park  
6701 S. Archer Road  
Bedford Park, Illinois 60501

Subject: Chicago Area Waterway System Use Attainability Analysis (UAA)  
Request for Information

Dear President Robison:

The Illinois Environmental Protection Agency (Illinois EPA) along with a stakeholder advisory committee representing government, commercial, recreation and environmental group interests is seeking your input into a multi-year study of the Chicago area waterway system that is scheduled for completion in 2004. Specifically, we are asking municipal, county and organizational officials for their assistance in identifying Chicago area waterway related development plans underway within their jurisdictions over the next ten years that would have an impact on the use of or water quality within the identified waterways. The inclusion of estimated or actual schedules and costs for any such planned activities would be especially important to us. Your forwarding of this request to other interested parties would also be most appreciated, and I apologize if this is a redundant request and you have already made such submissions to the Illinois EPA UAA project.

Examples of development include modification or restoration of waterway channels and shorelines to create or enhance aquatic life habitat or to expand or promote waterway recreational and commercial opportunities, including:

- dredging or capping of sediments
- installation or enhancement of in-stream structures and shoreline vegetation;
- installation of wetlands associated with the waterways;
- removal of fencing or other impediments to waterway access;
- installation or expansion of river-related commercial or recreational facilities, such as terminals, moorings, beaches, boat launches, parklands, fishing piers, nature trails, pedestrian paths, seating areas and other public access facilities.

We are also interested in your organizations' existing and planned river-related, public recreational events such as: canoeing and kayaking, river-edge cleanup and restoration and other such activities.

Your earliest submission of this information within the next 30 days would be most appreciated so that we may include it in the decision-making framework of our study. Any development plans that are covered in projects governed by an NPDES permit need not be communicated to us as a part of this Use Attainability Analysis request.

The Chicago area waterways include the following waterbodies:

1. North Shore Channel from Lake Michigan to the confluence with the North Branch of the Chicago River
2. North Branch of the Chicago River from it's confluence with the North Shore Channel to its confluence with the South Branch, including the North Branch Canal along the east side of Goose Island
3. Chicago River
4. South Branch of the Chicago River, including the South Fork and navigation slips
5. Chicago Sanitary & Ship Canal, including the Collateral Channel
6. Lake Calumet and Lake Calumet Entrance Channel
7. Calumet River from Lake Michigan to the confluence with the Grand Calumet River
8. Grand Calumet River
9. Little Calumet River North Leg from its junction with the Grand Calumet River to the Calumet-Sag Channel
10. Calumet-Sag Channel

The UAA is the first in-depth evaluation of the Chicago area waterways in nearly three decades and the analysis and subsequent revisions of water quality standards will have a major impact on how the waterways can potentially be used ecologically, commercially and recreationally. Please visit [ChicagoAreaWaterways.org](http://ChicagoAreaWaterways.org) for more information on the UAA.

Thank you in advance for your participation in this effort. If you have any questions, please contact me at 847/294-4037 or via email at [rob.sulski@epa.state.il.us](mailto:rob.sulski@epa.state.il.us).

Very truly yours,



Rob Sulski  
UAA Project Manager  
Division of Water Pollution Control  
Bureau of Water

May 14, 2004 UAA Letter to Village Bedford Park  
Page 3

cc: Toby Frevert, IEPA  
Ronald French, CDM  
File

Letter Recipients:

Metropolitan Water Reclamation District  
Illinois International Port District  
Village of Alsip  
Village of Bedford Park  
City of Chicago - Mayor's Office, Department of Planning and Development,  
Department of Environment, Department of Water Management  
Chicago Park District  
Cook County Forest Preserve District  
DuPage County Forest Preserve District  
Will County Forest Preserve District  
Village of Wilmette  
Wilmette Park District  
Village of Skokie  
Skokie Park District  
City of Evanston  
Village of Palos Hills  
Village of Worth  
Village of Palos Park  
Village of Lincolnwood  
Lincolnwood Park District  
Village of Dolton  
Dolton Park District  
Calumet City  
Calumet Memorial Park District  
Village of Burnham  
City of Blue Island  
Village of Summit  
Village of Justice  
Village of Stickney  
City of Cicero  
Town of Forest View  
Village of Summit  
Village of Hodgkins  
Village of Summit  
Village of Willow Springs  
Village of Lemont  
City of Romeoville