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STATE OF ILLINOIS
Pollution Control Board

November 2, 2009

John Therriault, Assistant Clerk
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601

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Re: Rulemaking R08-009

Dear Illinois Pollution Control Board:

I am writing to express my strong support for the proposal by the Illinois Environmental Protection Agency to require disinfection of treated water discharged into the Chicago River system by the Metropolitan Water Reclamation District. I am a certified sea kayak instructor who has paddled extensively both on the Chicago River and on other, cleaner waters in our region. I am also a participant in the CHEERS epidemiological study being conducted by the UIC, and have serious doubts based on my own experience whether a study of this nature can capture the radical difference between the way paddlers use polluted versus clean waters.

I have been paddling in the greater Chicago area for approximately nine years, and have been a certified instructor and coach since 2007. I paddle on the DuPage, Vermillion, Fox and Chicago rivers, as well as along Lake Michigan's shoreline. I frequently assist with beginner kayak trips offered by the Chicago Whitewater Association. Most of my teaching is on Lake Michigan, the Fox River and in the Big Rock Quarry (in Sugar Grove), but I occasionally teach in the Skokie Lagoons.

Because of the bacterial pollution in the Chicago River, there is a huge difference between the way I paddle there and the way I do so in cleaner waters, and I almost never teach on the Chicago River. When I take kayakers on waterways that are relatively clean – Lake Michigan, the DuPage and Vermillion rivers – we deliberately get very wet. Beginners practice hanging upside down in their boats while awaiting a rescue, and swimming out of their overturned boats to safety—essential skills for safe paddling. More advanced paddlers purposely capsize as we push the limits of our skills and practice rolls and rescues. In other words, we not only don't worry about getting wet on these rivers--we encourage it.

Paddling on the Chicago River, however, is a completely different experience. I am not willing to teach most kayaking skills on the Chicago River because, as noted above, teaching those skills requires getting quite wet. I have only led one sightseeing trip on the Chicago River. We did our best to stay dry, and I warned people to avoid touching the water. We thoroughly washed ourselves and our gear afterwards.

Beginners can and do capsize on occasion, of course, even on a flat river like the Chicago River. But in my experience and that of other paddlers I've talked to, people are very cautious. I am a member of several local paddling listservs, so I requested information from anyone who had paddled on the Chicago River. All of them expressed a general cautiousness about paddling on the Chicago River, similar to mine. When fellow instructors take beginners on the river, they don't take risks. Students don't hang upside down and get water up their noses, as they do on cleaner rivers. In fact, beginners aren't generally permitted to wear spray skirts, so they would likely fall out of their boats long before they were completely upside down.

As noted above, I have participated in the UIC CHEERS study, and completed the required questionnaire. I recall that several of the questions attempted to ascertain how wet I got while paddling and how much water I swallowed. However, in light of my experiences, I am profoundly skeptical that the questions in the CHEERS study are sufficient to get at the huge difference between the way kayakers are exposed to water in the Chicago River and the way we are exposed to the water in cleaner rivers. The survey questions are very general. They ask, as I recall, how wet each of various named body parts got on the river trip, with a list of choices from "sprinkled" to "submerged." This type of question does not get at the profound difference between getting wet once, accidentally, and a full day of constant and intentional submersion.

I also doubt that the CHEERS study questionnaire is likely to produce an accurate picture of how much water people ingest in these different venues. The questionnaire asks participants to estimate how much water they swallowed. However, in my judgment and experience, it is simply not possible for kayakers – particularly beginners, who spend the most time in the water – to give anything close to an accurate estimate of that. Hence, it is unlikely that participants' answers will provide an accurate picture of just how much more water we routinely swallow in clean water bodies. When we are on the Vermillion River, Lake Michigan or other place where we are not worried about water quality, we are underwater or in the water for large amounts of time. It is next to impossible, at the end of a full day of that, to make an accurate estimate of how much water we have ingested. We certainly get some in our mouths and noses every time we fall in (intentionally or not) but we aren't going to have an accurate tally at the end of the day. Moreover, when beginners capsize, they tend to panic and forget really basic things, like the instructions they were given to hold onto the boat and the paddle. I seriously doubt that when they can't recall such basic safety instructions, they can realistically remember how much they swallowed with any sort of accuracy. It is simply not credible to me that the wild-guess estimates of ingestion volume provided in response to the CHEERS questionnaire are going to provide good data on the different amounts of water ingested in different places and circumstances.

As I mentioned earlier, I posted questions regarding others' experiences on several paddling listservs. Below are some examples of the responses I received.

- **Scott Fairty, General Manager, Geneva Kayak Center:** "At Geneva Kayak Center, we have specifically chosen not to use the river for any tours or

instructional programs; it simply isn't clean enough. When we introduce new paddlers to the sport of kayaking we want the experience to be as positive as possible. If we were to first have to warn our clients to not get water splashed in their faces, and not to paddle if they have open cuts or sores, it would pretty much suck the fun right out of the day. We would certainly utilize the river if it were cleaner."

- **Sarah Hartman, Rolling Meadows.** "On this river [the Chicago River], I paddle in such a way as to minimize contact with the water. I keep my paddle angle extremely low to minimize drips onto my spray skirt and to reduce chances of splashes on my face. My launch is seal launch to minimize foot and leg contact with the water. When I get home, all gear and boat are washed with warm soapy water (the boat gets a dose of bleach as well). I take a hot soapy shower after contact with the river, including washing my hair to minimize any chemical or biological impact."
- **Steven E. Gross, Chicago:** "Whenever I do paddle [on the Chicago River] I try very hard not to splash water in my face."

Many of my fellow paddlers avoid the Chicago River altogether because of the contamination issue. I would paddle on it more frequently and entirely differently if the Water Reclamation District would disinfect wastewater, the way pretty much every other town with a river flowing through it does.

It's not an answer to just tell people to be careful. As Mr. Fairty of the Geneva Kayak Center pointed out, that kind of warning threatens to "suck the fun right out of the day" and prevents us from fully engaging in the sport of kayaking in the way we can other places. Moreover, as more and more groups use the Chicago River to train for rowing and other races – as is happening now – it will be harder and harder to address the contamination problem by telling people to take precautions. Racing boats are very tippy by nature; it's not possible to train hard and keep from getting wet.

I urge you, in making your decision whether or not to support the Illinois EPA's proposal, to consider the Chicago River not just as it is now but as it could be. Right now, despite the really very problematic bacterial contamination from the District's plants, the river is a wonderful venue for sightseeing. It could be a venue where people can have that experience without following it up with a day of cleaning their boats and gear and worrying that they might get sick.

Thank you for considering my comments.
Sincerely,



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