

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF: )  
 )  
 WATER QUALITY STANDARDS AND )  
 EFFLUENT LIMITATIONS FOR THE ) R08-9  
 CHICAGO AREA WATERWAY SYSTEM ) (Rulemaking – Water)  
 AND THE LOWER DES PLAINES RIVER: )  
 PROPOSED AMENDMENTS TO 35 ILL. ) (Subdocket C)  
 Adm. Code Parts 301, 302, 303 and 304 )

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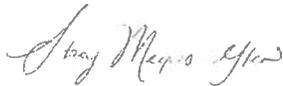
To: John Therriault, Clerk  
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Persons included on the attached  
 SERVICE LIST

PLEASE TAKE NOTICE that on the 23<sup>th</sup> Day of February, 2011, I electronically filed with the Office of the Clerk of the Illinois Pollution Control Board the attached Pre-Filed Questions for Scudder Mackey Concerning the Chicago Area Waterway System Habitat Evaluation and Improvement Study, a copy of which is hereby served upon you.



By: \_\_\_\_\_  
 Stacy Meyers-Glen

Dated: February 23, 2011

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**Pollution Control Board**

**CERTIFICATE OF SERVICE**

I, Stacy Meyers, the undersigned attorney, hereby certify that I have served the attached Pre-Filed Questions for Scudder Mackey Concerning the Chicago Area Waterway System Habitat Evaluation and Improvement Study, on all parties of record (Service List attached), by depositing said documents in the United States Mail, postage prepaid, from 25 East Washington, Suite 1650, Chicago, Illinois before the hour of 5:00 p.m., on this 23<sup>th</sup> Day of February, 2011.



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Stacy Meyers-Glen

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**PRE-FILED QUESTIONS FOR SCUDDER MACKEY CONCERNING  
 THE CHICAGO AREA WATERWAYS  
 HABITAT EVALUATION AND IMPROVEMENT STUDY**

Openlands poses the following questions to Scudder Mackey concerning the Chicago Area Waterway System [CAWS] Habitat Evaluation and Improvement Study and Habitat Evaluation Report, prepared for Metropolitan Sanitary District of Greater Chicago by Limnotech on January 4, 2010:

A. In the Habitat Evaluation Report, dated January 4, 2010, Table 7-7 labeled *CAWS Habitat Index Scores for Major Reaches*, a series of habitat scores are given for major reaches of CAWS. The scores range from a high of 75.2 at the North Shore Chanel, North of the North of the Water Reclamation Plant (WRP) to a low of 33.8 at the South Branch Chicago River.

1. What is the interpretation of the scores ranking?
2. Do high scores over 70 have a narrative interpretation as *good* habitat?
3. What score ranking cutoffs would be used for attainment of uses for each reach?

B. In the Habitat Evaluation Report, a statement was made as to the efficacy of floating Islands in the CAWS, as quoted below.

“As a result of inquiries made as part of this Study, no aquatic habitat improvement projects were identified on the CAWS that included monitoring data to measure effectiveness; therefore the identified projects offer little to inform the assessment of habitat improvement potential on the CAWS “  
Habitat Improvement Report, p. 34.

Literature suggests floating islands can make a significant contribution to habitat improvement for fish in localized settings.

1. Apart from the appendices, did the Habitat Evaluation and Improvement Study evaluate the effectiveness of floating islands as a means of fish or macro-invertebrate restoration from data available in other parts of the United States or other freshwater riverine systems in Europe?
2. Would you agree that floating islands might have a benefit for habitat restoration to fishes and some types of macro-invertebrates?

C. In the Habitat Evaluation Report, a statement was made that floating islands cost \$150 per square foot.

1. How did the study arrive at this cost estimate?
2. How much can (and have) use of volunteers defray costs?
3. Are you aware of lower cost estimates for other components of floating islands, such as emergent nursery plants, polypropylene rope and concrete block anchors?

4. Is there a cost benefit ratio that can be arrived at for the use of floating islands?

D. Overhanging and immersed vegetation produces physical habitat as well as locally cooler microhabitats for fish and invertebrates. The Habitat Evaluation and Improvement Study showed that macrophyte cover and hanging vegetation were the second and third most important factors that were positively correlated with fish variability. (See p. 131, Habitat Evaluation and Improvement Study.)

1. Would planting saplings of native floodplain trees produce an economical and viable amount of overhanging habitat and shade in localized areas of CAWS over time?

E. The summary of the habitat assumes that dissolved oxygen levels are relatively unimportant compared to habitat. When fish metrics are compared to dissolved oxygen, the only significant correlation is the number/percent of Minnows and Sunfish.

1. How do you reconcile the fact that dissolved oxygen significantly correlates with minnows and sunfish in the study's significance tables, and minnows and sunfish comprise 90% of the top 10 fish by numbers caught?

2. The most abundant fish in the CAWS is the gizzard shad, which serves as a forage fish for top predators like Large mouth Bass. Is the Gizzard shad limited by habitat in the CAWS, especially for spawning?

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