

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
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)
WATER QUALITY STANDARDS AND)
EFFLUENT LIMITATIONS FOR THE) R08-09 Subdocket C
CHICAGO AREA WATERWAYS SYSTEM) (Rulemaking- Water)
(CAWS) AND THE LOWER DES PLAINES)
RIVER: PROPOSED AMENDMENTS TO)
35 Ill. Adm. Code Parts 301, 302, 303 and 304)
(Recreational Use Designations))

NOTICE OF FILING

To:

John Therriault, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph St., Suite 11-500
Chicago, IL 60601

Marie Tipsord, Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph St, Suite 11-500
Chicago, IL 60601

Persons included on the attached
SERVICE LIST

Please take notice that, as a courtesy to The Wetlands Initiative, on the 30th Day of June, 2011, I filed with the Office of the Clerk of the Illinois Pollution Control Board the attached **PRE-FILED TESTIMONY OF PAUL BOTTS**, a copy of which is hereby served upon you.

Respectfully Submitted,



Jessica Dexter
Environmental Law and Policy Center
35 E. Wacker, Suite 1600
Chicago, IL 60601

DATED: June 30, 2011

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
WATER QUALITY STANDARDS AND)
EFFLUENT LIMITATIONS FOR THE) R08-09
CHICAGO AREA WATERWAY SYSTEM) (Rulemaking – Water)
AND THE LOWER DES PLAINES RIVER:)
PROPOSED AMENDMENTS TO 35 ILL.)
ADM. CODE PARTS 301, 302, 303, AND 304.)

Testimony of Paul Botts
June 28, 2011

My name is Paul Botts and I am the executive director of the Wetlands Initiative (TWI), a not-for-profit organization dedicated to restoring the wetland resources of the Midwest to improve water quality, increase wildlife habitat and biodiversity, and reduce flood damage. TWI was founded in 1994 in recognition of the need for a wetlands-restoration organization that was small, nimble, and focused. Our primary interest and expertise is not in the saving of pristine wilderness areas but rather in restoring wetlands that had previously been drained, degraded, altered or removed.

In its first decade the Wetlands Initiative committed to two of the most important restoration projects in Illinois: the Hennepin & Hopper Lakes Project (now the Sue and Wes Dixon Waterfowl Refuge) and Midewin National Tallgrass Prairie. In our second decade we remain deeply involved in exciting restoration progress at those sites, while expanding our scope. We are working as conservation entrepreneurs to advocate, develop, and test innovative strategies for wetlands restoration. These strategies include developing ecosystem service markets that compensate landowners for restoring wetlands for the beneficial services that this natural infrastructure can provide. We also seek to demonstrate how wetlands can be restored even in the most challenging circumstances.

In recent decades the health of the Chicago River has improved dramatically. Once home to few fish species and little wildlife, the river is now home to nearly 70 species of fish, 60 species of birds and a growing diversity of animals including beavers, muskrats, mink, and river otters. As artificial barriers to access have come down, Chicago residents and visitors have rediscovered the river as a natural amenity. New watercraft launches, riverside parks and plazas and miles of trails now bring people down to the water, and riparian landowners such as the Chicago Park District and homeowner associations are encouraging active use.

The Wetlands Initiative has worked with a variety of partners to design two projects to test innovative techniques for wetlands restoration in contexts like the Chicago River. These two projects would, if implemented, test and demonstrate practical methods for achieving several of the objectives of the City of Chicago's "Chicago River Agenda" including in-stream habitat improvements, eliminating invasive species, and riverbank restoration. In particular, "active capping" is a promising new treatment approach for sediment remediation that offers long-term immobilization and the potential to break down or destroy pollutants with the use of degradation agents in an applied, multi-layer cap. Unlike traditional capping or armoring techniques, active capping involves thin layers of different materials that actively stabilize and sequester metal and organic contaminants. In addition to isolating the contaminants from the overlying water, the active capping materials can stimulate the breakdown of the contaminants by microbes in the underlying sediments. To further improve surface water quality, a diverse wetland composed of deep and shallow marsh and wet prairie plant communities can be planted on top of the capping materials.

The Bubbly Creek Turning Basin Active Capping Demonstration Pilot Project would use innovative active capping strategies for wetlands creation at a site located at the confluence of the South Fork of the South Branch (a.k.a. Bubbly Creek) and the South Branch of the Chicago River. In development since 2000, this project would further develop this promising solution to the nationwide problem of remediating contaminated sediments while improving water quality, creating new wetlands habitat and expanding fishing access to the river. This demonstration project would test the water quality impacts of different contaminant-specific active capping materials in eight test plots spanning 4 acres, in a combination of open-flow and hydraulically-isolated conditions in conjunction with a constructed wetland. This project would demonstrate water quality improvement, increase wildlife habitat, and provide vital, high quality open space and recreational opportunities to a community in need of these amenities. TWI has collaborated on this effort with the City of Chicago's Department of Environment, the University of Illinois at Chicago, the Metropolitan Water Reclamation District of Greater Chicago, the Chicago Park District and the U.S. Army Corps of Engineers. A similar project is now underway on the Grand Calumet River in Indiana.

Located downstream from Bubbly Creek in the Chicago Sanitary and Ship Canal, Collateral Channel is a dead-end slip containing sediments contaminated with large quantities of organic and inorganic pollutants from past municipal and industrial wastes. The Collateral Channel Demonstration Project would use active capping technology to stabilize the contaminated sediments in the channel, improve water quality, control greenhouse and noxious gas emissions and create a high quality wetland on top of the protective cap. This one-acre project will help demonstrate the ability of a wetland to clean polluted water including

effluent from combined-sewer overflows in an urban setting, while also providing habitat for native and migrating wildlife as well as new neighborhood waterway access in the form of a gazebo and walkway overlooking the new wetlands. TWI collaborated in the design and planning of this project with the Metropolitan Water Reclamation District of Greater Chicago, Patrick Engineering, the University of Illinois at Chicago, the Boeing Co., and several private foundations.

Both of these projects are designed and engineered; they await only implementation funding, final specifications and the relevant permits. If carried out these projects would demonstrate the specific techniques and benefits just described. They would also help the public and policymakers understand that wetlands habitat can be restored to any river system, even where challenges such as heavily-contaminated sediments and armored banks seem at first glance to make that an implausible objective.

The Chicago River has taken impressive steps towards a remarkable recovery. As a Chicago native and lifelong area resident who is old enough to remember when few would even consider kayaking in the Chicago, I look forward to even more success to come. The Wetlands Initiative and its partners on these projects are excited about demonstrating how that can be achieved on the ground in Chicago.

Submitted by:



Date: June 28, 2011

Paul Botts
Executive Director
The Wetlands Initiative
53 W. Jackson, Suite 1015
Chicago IL 60604

CERTIFICATE OF SERVICE

I, Jessica Dexter, hereby certify that I have served the attached **Testimony of Paul Botts** upon:

Mr. John T. Therriault
Assistant Clerk of the Board
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601

via electronic filing on June 30, 2011; and upon the attached service list by depositing said document in the United States Mail, postage prepaid, in Chicago, Illinois on June 30, 2011.

Respectfully Submitted,



Jessica Dexter
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June 30, 2011

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