

**ORIGINAL**

# Prairie Rivers Network

**RECEIVED**  
CLERK'S OFFICE  
MAR 20 2001

## Protecting Illinois' Streams

STATE OF ILLINOIS  
Pollution Control Board

Executive Director

Robert J. Moore

Board of Directors

Bruce Hannon  
President  
Champaign, Illinois

Jon McNussen  
Treasurer  
Villa Grove, Illinois

Eric Freyfogle  
Secretary  
Urbana, Illinois

Karen Ennen  
Naperville, Illinois

Michael Rosenthal  
Glencoe, Illinois

Ken Hartke  
Topeka, Illinois

Clark Bullard  
Urbana, Illinois

Virginia Scott  
Springfield, Illinois

Laurene von Klan  
Chicago, Illinois

Charles Goodall  
Sidell, Illinois

Ms. Dorothy Gunn  
Clerk of the Board  
Illinois Pollution Control Board  
100 W. Randolph St., Suite 11-500  
Chicago, Illinois 61601

March 19, 2001

*P.C. #42*

To the Illinois Pollution Control Board:

We the undersigned organizations urge you to adopt antidegradation rules which accomplish the following:

1. Guarantees the protection of all existing uses of Illinois' waters including swimming, fishing, paddling, drinking water, and the preservation of aquatic species, including threatened or endangered species.
2. Maintain water quality in high quality waters and those waters that are currently better than the minimum water quality standards for the state of Illinois.
3. Provide for a fair process for designating streams of exceptional recreational and ecological significance as "Outstanding Resource Waters."

In order to accomplish these goals we request that the Illinois Pollution Control Board adopt the following principles.

First, we suggest that the Board not adopt a de minimis provision or a significance test as part of Illinois' antidegradation policy. A de minimis provision and a significance test would allow arbitrary levels of pollution to be released to our waters without undergoing an adequate review to determine if existing uses would be harmed or if water quality would be unnecessarily degraded.

Second, we urge the board to remove the exception from antidegradation review of activities covered under a General NPDES permit. Just because an activity is covered under a General NPDES permit, rather than a site-specific NPDES permit, does not mean it will not cause degradation. At a minimum we request that board not allow general permits to be issued in waters that are known to contain rare species or species that are intolerant of pollution.

Third, we ask that the board not adopt any additional exceptions to antidegradation review. The exceptions described in the Agency's original proposal (excluding the one from general permits) are adequate and cover a broad range of activities for which an antidegradation review would be duplicative.

809 South Fifth Street  
Champaign, IL 61820  
217-344-2371  
Fax 217-344-2381

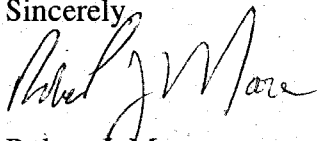
Additional exceptions proposed by the regulated community are not consistent with the concept of antidegradation.

Lastly, we request that the Board adopt procedures for the designation of Outstanding Resource Waters that are not overly burdensome. The proposed rules create a process which we believe would exclude any organizations such as ours from ever bringing a petition before the Board. We request that the socioeconomic analysis be much more limited in scope and only require a simple statement on the potential impacts to the local economy. We also request that the list of recipients of the full petition be restricted to the Board, Illinois EPA, and Illinois DNR, with a reasonable notification list possibly included to cover other potentially interested parties.

We applaud the efforts to date of the Board and the Illinois EPA to create the proposal which is now under your consideration. A strong antidegradation policy is an essential piece to Illinois' clean water program and one which has been largely missing for far too long.

Thank you for the opportunity to provide input on the important matter.

Sincerely,



Robert J. Moore  
Executive Director  
Prairie Rivers Network

Other groups also signing on to this letter:

Kathy Andria  
**American Bottoms Conservancy and**  
348 R Collinsville Ave.  
East St. Louis, IL 62201

Tom Wall, President  
**Better Fishing Association of Northern**  
**Illinois**  
1212 Peoria Street  
Peru, IL 61354

Dennis Lubbs and Kathy Lubbs, Co-chairs  
**Bureau County Natural Area Guardians**  
29541 1250 East Street  
Walnut, IL 61376-9801

Dan Faust, Chairman  
**Central Illinois Chapter of the Illinois**  
**Paddling Council**  
17 Oakwood Drive  
Pontiac, IL 61764

Erik Sprenger, Regulatory Affairs Chairman  
**Chicago Whitewater Association**  
633 N. Genesee St.  
Waukegan, IL 60085

Phyllis Oliver, President  
**Citizens Committee To Save Cache River**  
360 Walker Drive  
Vienna, IL 62995

Jan King, President  
**Citizens Organizing Project**  
1776 Knox Highway 11  
Gillison, IL 61436

Gary Mechanic, Chairman  
**Des Plaines River Alliance**  
4905 N. Hamlin  
Chicago, IL 60625

Karen Hudson, President  
**Families Against Rural Messes  
(F.A.R.M.)**  
P.O. Box 615  
Elmwood, IL 61529

Sam Stearns, Public Education Coordinator  
**Friends Of Bell Smith Springs**  
RR 1, Box 154  
Stonefort, IL 62987  
Nick Nikola  
**Friends Of Critters And Salt Creek**  
114 Essex Road  
Elk Grove Village, IL 60007

Robert Vogl, President  
**Friends Of The Rock River**  
1230 E. Honey Creek Road  
Oregon, IL 61061

Marianne Nelson  
**Friends Of Tyler Creek**  
316 River Bluff Rd  
Elgin, IL 60120

Mark Donham, Forest Watch Coordinator  
**Heartwood**  
RR # 1, Box 308  
Brookport, IL 62910

Ken Konsis, President  
**Illinois Association of Conservation  
Districts**  
2296-A Henning Road  
Danville, IL 61834

Marilyn Campbell  
**Illinois Audubon Society**  
425B N. Gilbert  
P.O.Box 2418  
Danville, IL 61834-2418

Lynne Padovan, Executive Director  
**Illinois Environmental Council**  
319 W. Cook  
Springfield, IL 62704

Kevin Bradley, President  
**Illinois Paddling Council**  
610 Randi Lane  
Hoffman Estates, IL 60194

Brian Metcalf, Environmental Associate  
**Illinois Public Interest Research Group  
(IL PIRG)**  
180 West Washington  
Suite 500  
Chicago, IL 60602

Dr. Bob Williams  
**Illinois Rivers Project**  
Southern Illinois University  
Box 2222  
Edwardsville, IL 62026

Randy Vogel, Executive Director  
**Illinois Stewardship Alliance**  
POB 648  
Rochester, IL 62563

Laura Huth, Executive Director  
**Illinois Student Environmental Network**  
110 S. Race, Suite 205  
Urbana, IL 61801

Don Langford, Commodore  
**Lincoln Park Boat Club**  
1936 N. Clark St., #10  
Chicago, IL 60614

DeAnna Belz  
**Living Upstream, Bloomington Chapter**  
Rt. 1 Box 166  
Towanda, IL 61776

George Burrier, President  
**Mackinaw Canoe Club Of Central Illinois**  
257 E. Washington St.  
East Peoria, IL 61611

Kathy Andria  
**Madison County Conservation Alliance**  
348 R Collinsville Ave.  
East St. Louis, IL 62201

Richard H. Acker, Regional Land Use  
Coordinator  
**Openlands Project**  
25 E. Washington St., Suite 1650  
Chicago, Illinois 60602

Kristi Hanson  
**Regional Association Of Concerned  
Environmentalists (RACE)**  
Rt. 1 Box 308  
Brookport, IL 62910

Jeff Swano, Executive Director  
**Salt Creek Watershed Network**  
8738 Washington Ave.  
Brookfield, IL 60513

Brook McDonald, Executive Director  
**The Conservation Foundation**  
10 S. 404 Knock Knowles Road  
Naperville, IL 60565

Jacquelyn Dobrinska, Project Manager  
**The Wetlands Initiative**  
53 W. Jackson Blvd. #1015  
Chicago, IL 60604-3703

Ed Michael, Conservation and Fishery  
Development Chair  
**Trout Unlimited, Illinois Council**  
223 Barberry Road  
Highland Park, IL 60035