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STATE OF ILLINOIS
Pollution Control Board

PC 40

Re: Proposed amendments to dissolved oxygen standard (R04-25)

Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph St.
Suite 11-500
Chicago, IL 60601

Dear Ms. Gunn,

In April 2004, the Illinois Association of Wastewater Agencies (IAWA) submitted a proposal to the Illinois Pollution Control Board proposing to lower the dissolved oxygen criteria from 5.0 mg/l to 3.5 mg/l during the months of July through February. I am writing you to ask that you reject IAWA's request. The proposed reduction in dissolved oxygen criteria will not improve the condition of Illinois streams such as the Fox River, rather it will have the opposite effect by further degrading water quality and harming aquatic life. The current Illinois standard for dissolved oxygen follows U.S. Environmental Protection Agency guidelines and past scientific studies do not support a lower standard. Therefore, the Illinois Pollution Control Board should reject the proposal to lower dissolved oxygen standards.

In 2002, the Fox River was categorized as impaired by the Illinois Environmental Protection Agency. One of the reasons for the river's impairment is low dissolved oxygen. The effects of low dissolved oxygen in rivers such as Fox are well documented. At extremely low oxygen levels, fish kills result. Low dissolved oxygen levels in the Fox River will also negatively impact fish species that spawn in late summer, and sportfish such as smallmouth bass are sensitive to low dissolved oxygen levels. Freshwater mussels and other aquatic macroinvertebrates are also negatively affected by low dissolved oxygen. The aquatic fauna in the Fox River is already threatened by deteriorating water quality with several species becoming extirpated from the watershed in recent decades. Lower dissolved oxygen will only exacerbate the problems the Fox River faces.

Robert Schanzel made the following comments on behalf of the Illinois Chapter of the American Fisheries Society regarding the proposal: "The Illinois Chapter of the American Fisheries Society does not support relaxing Illinois' existing dissolved oxygen standards because insufficient evidence is available that such action will not have serious and irrevocable consequences for the state's aquatic biota - that is, the science does not support the proposed changes." Schanzel also states "To lower quality standards now, would not serve the best interests either of Illinois' citizens or its aquatic resources."

The condition of the Fox River is impacted by multiple stressors. As these stressors become intensified the ecosystem deteriorates. The degradation of the Fox River has and will continue to affect the well being of its residents. In February 2004, over 150,000 residents in Aurora were recommended to boil their water. A report prepared by Weston Solutions indicated that the majority of the blame for the boil order could be placed on the deterioration of water quality in the Fox River. The proposed rule change by IAWA will not improve the condition of the Fox River, but it has the potential to accelerate its declining condition. Thus, it should be rejected by the Illinois Pollution Control Board.

Thank you very much for your time and consideration.

Sincerely,



Mark Donnelly

— City of Elgin —
Water Department

Mark H. Donnelly

Assistant Chief Plant Operator

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Place
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