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Friends of the Chicago River

APR 24 2006

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

PROPOSED AMENDMENTS TO
DISSOLVED OXYGEN STANDARD 35 ILL.
ADM.CODE 302.206

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) R04-25
) (Rulemaking – Water)
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)

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PC#118

My name is Todd Main and I am the Policy Director for the Friends of the Chicago River. Friends of the Chicago River is 25 year old nonprofit organization dedicated to fostering the vitality of the Chicago River for the human, plant and animal communities within its watershed.

We represent the voices of over 1500 members and hundreds of volunteers who support our efforts to restore the health of the river. Friends of the Chicago River, brings together coalitions, initiates planning solutions, connects people to the River through public outreach programs, and supports an innovative education program. Our priorities are to provide public access to the Chicago River and to show that the Chicago River can be both ecologically healthy and a catalyst for community revitalization.

We wish to thank the Board for the opportunity to submit comments and participate in this process. While inconvenient for some, we feel that the citizens of Illinois are smart enough to understand the issues under consideration and deserve to have a seat at the table. We also know that our community is stronger and the outcome will be better when more people participate.

We are writing to express our support for the Dissolved Oxygen standards proposed by the IEPA and IDNR. Since the public meeting last fall we have been actively participating in the stakeholder meetings, and monitoring the process. We are pleased that the outcome has produced a much better regulatory standard for Illinois that if properly administered will be more protective of aquatic life.

1. We are pleased that the IEPA/IDNR joint proposal recommends the use of a two tiered standard that recognizes the need for enhanced protection on waters that require a higher standard to protect aquatic life. We understand that this is an interim standard and look forward to working on developing a multi-tiered approach in the future, so that Illinois may join together with other Midwestern states that have modernized their regulatory regimes.

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2. We agree with the IEPA/IDNR joint recommendation that the higher protection annual period be extended through the end of July rather than the IAWA proposed end of June to protect sensitive early life stages of summer spawning fish.
3. We applaud the outstanding work of the staff of the both IEPA and IDNR who clearly worked creatively and thoroughly to come up with a standard that was both scientifically defensible and protective of aquatic health.
4. We have a one concern that we hope the board will address in its final decision. The success of this proposed new standard in protecting aquatic life will to a large degree be determined by the data collection and sampling. We request that future dissolved oxygen sampling be conducted at a time that will measure daily minimum levels rather than maximums. Specifically we urge that sampling be conducted at 12:00 am or 6:00 am. When daily variations in levels of dissolved oxygen can be accurately gauged.

Friends of the Chicago River

By: 

Todd Main, Policy Director

April 24, 2006

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