

## Illinois Association of Wastewater Agencies

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January 4, 2007

Pollution Control Board  
Dorothy Gunn, Clerk  
JRTC  
100 Randolph Street, Suite 11-500  
Chicago, Illinois 60601

**RE: Pollution Control Board Rule R2004-025  
Proposed Amendments to Dissolved Oxygen Standard  
35 ILL. ADM.CODE 302.206**

Ms. Gunn

As public comments were posted on the Pollution Control Board web site, I was disappointed to find the Illinois Section of the American Fisheries Society (IS/AFS) public comment on the referenced petition. The leadership of the IS/AFS has chosen to file its comments pretending to be an independent organization with interest in the proposed amendments. Knowing that Dr. Garvey is an officer on the executive committee I questioned Dr. Garvey regarding the letter and how the decision was made to file it as a public comment. I came to find that Dr. Garvey had recused himself from any decisions being made by the board in this matter because of his deep involvement. (I also found that Ann Holtrop had recused herself) However, when I asked how the membership voted on the ultimate position of the society I came to find that the membership itself had not been polled and in fact the decision had been made by the executive committee and the various committee chairs of the society. Those members and their affiliations are;

Executive Committee

President: Dr. Robert Fischer - Professor, EIU  
President-elect: Jim Garvey-SIU (recused from voting)  
Secretary-Treasurer: Ann Holtrop-DNR (recused from voting)

Committee Chairpersons

Randy Sauer – DNR	Matt Diana - INHS
Jeff Stein – INHS	Rob Hilsabeck - DNR
Karen Rivera – DNR	Steve Shults – DNR
Trent Thomas – DNR	Steve Pallo – DNR
Douglas Carney – DNR	Dan Stephenson - DNR
Jeremy Tiemann – INHS	Dan Sallee - DNR
Scott Shasteen – EPA	Jim Mick – DNR
Kenneth Clodfelter – DNR	

Bruce Lippincott - Illinois Environmental Council and employed by private consulting firm

I found that of the nineteen members who approved the letter, fifteen are affiliated with the Department of Natural Resources (DNR), Illinois Natural History Survey (a division of DNR) or with Illinois Environmental Protection Agency. In fact a DNR employee, Mr. Ronald Sauer, drafted the letter!

While I appreciate the position of the IS/AFS as an influential sport minded organization within Illinois, I think the board should question the position taken by this “independent” organization. The IS/AFS chose not to participate in any of the many hearings in this petition. There was no opportunity to cross-examine their opinions nor did they file or present any testimony when they clearly had many opportunities to do so. It particularly distresses me that the letter was submitted without clearly identifying that a great majority of the members responsible for it are employees of the two state agencies who have so strongly opposed the IAWA position. I'd like this letter to be an observation that the position taken by the executive committee and others may not be that of the membership and that the individuals who have chosen to take this position obviously have a conflict in the matter.

I understand that the time for the filing of testimony is expired but I respectfully ask that this letter be accepted and included with the post hearing comments filed by IAWA.

Sincerely,



Dennis Streicher  
Illinois Association of Wastewater Agencies

Cc: Richard McGill, Hearing Officer  
Robert “Bud” Fischer, EIU  
Service list