

9 January 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**

Dear Ms. Gunn,

I have just received a letter written by Mr. Dennis Streicher representing the Illinois Association of Wastewater Agencies. In his letter Mr. Streicher makes the claim that the position taken by the Illinois Chapter of the American Fisheries Society (ILAFS) on the Proposed Amendments to the Dissolved Oxygen Standard was made solely by the executive committee and committee chairs of the ILAFS and was biased by the affiliation (IDNR and IEPA) of these members. In fact, the decision on the Chapter's position was made in accordance with the ILAFS bylaws, which state that all position papers must be approved by the executive committee. At this point the executive committee is composed of me, Jim Garvey and Ann Holtrop and since both Jim and Ann recused themselves from voting, I (someone with no affiliation with either the IEPA or IDNR) made the final decision regarding the Chapter's position on the Dissolved Oxygen Standard. The decision was not made in a vacuum, as has been suggested. Rather I sent an email to as many members as possible asking them to review the position the Chapter took at the beginning of the DO process (2004), read the transcript from the hearings (provided link) and comment on how we should respond to the proposed DO changes as a Chapter. After receiving input from the membership, I held a meeting of the executive committee and committee chairs to discuss the proposed Dissolved Oxygen Standard. At the end of the meeting, after receiving comments from the membership, the committees and having read the transcripts myself, I made the decision that the Chapter would continue to support its original comments filed with the Pollution Control Board in 2004. I then asked Randy Sauer, as the Chair of the Environmental Concerns Committee to revise the 2004 letter and send it to me for final approval. Once approved the ILAFS position was submitted as public comment to the Pollution Control Board.

The Chapter would also like to address some of the other comments made by Mr. Streicher. The ILAFS is not necessarily a "sport minded organization". In fact the mission of the ILAFS is to improve the conservation and sustainability of the aquatic

resources of the State. This is accomplished by advancing fisheries and aquatic science and by promoting the professional development of its membership. That mission is carried out by a membership composed of diversely trained professionals from various public agencies, institutions and private companies that participate in management, research and educational activities, all of which protect, promote, enhance and preserve the aquatic resources of Illinois. These professionals hold degrees (the majority have advanced degrees) in fisheries and related aquatic sciences. As such they have the ability to evaluate data, understand a scientific argument and make objective decisions based on the information available. The diversity, education and professionalism of Chapter members allow it to function as an independent organization. We understand that the IAWA disagrees with our opinions but the claim that our members are unable to be objective and that the Chapter has an agenda because some its members work for agencies involved in this discussion is incorrect and unfounded. Science moves forward through discussion and disagreement of the data presented not on speculation and innuendo.

Although the time for the filing of testimony is expired I am asking the Pollution Control Board to allow the ILAFS to respond to the IAWA letter and have our comments posted on the web site.

Sincerely,

Robert Fischer, PhD
President, ILAFS
Professor of Biology
Associate Chair, Biology
Eastern Illinois University