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STATE OF ILLINOIS **Pollution Control Board**

Pollution Control Board, Attention: Clerk

100 West Randolph Street James R. Thompson Center, Suite 11-500

Chicago, IL 60601-3218

May 9, 2007

RE: AS 2007-2 (Petition for Adjusted Standard)

To Whom It May Concern:

I am writing to you on behalf of the City of Alton and its 30,500 residents in support of Illinois American Water's petition to extend the adjusted standard that allows the Company to continue to discharge residuals from its Alton water treatment facility into the Mississippi River.

Discharging residuals into the Mississippi River has been the practice here in Alton for more than 100 years. It is my understanding that this direct discharge practice has been studied and does not adversely affect the river environment. Moreover, when the adjusted standard was renewed in 2000, the renewal was tied to a soil savings offset project in the Piasa Creek Watershed. The elimination of two pounds of sediment for every one pound generated by the water treatment facility has an overall positive impact on the environment and the river. The project has received numerous awards due to its overwhelming success.

The partnership between Illinois American Water and Great Rivers Land Trust reflects a creative alternate solution that has benefitted the Alton community and our environment. It serves as an example of the positive results that can be achieved when industry and environmentalists work together in the best interests of a community. These types of partnerships must be encouraged and not discouraged by regulations.

As Mayor of the City of Alton, I have four major concerns if the petition to extend the adjusted standard is denied.

- 1. The alternative is lagoons at the water treatment site. At a July 1998 public meeting at the historic Stratford Hotel in Alton, with Illinois EPA officials in attendance, local homeowners voiced their strong concern about the potential of lagoons being constructed at the new water plant. Local residents and city officials did not want lagoons in their backyards. I can assure you today that these residents and the City of Alton still do not want lagoons at the plant site.
- 2. Increased truck traffic on scenic byway. On-site treatment of residuals would require the daily hauling of river silt from the water treatment plant site to a landfill. This could mean as many as 17 truckloads per day and was projected to require at least three truck trips per day. As a result, on-site treatment means increased truck traffic along one of the nation's most scenic highways, which also runs near a public park and bike trail.



- 3. Higher water rates for our residents. There would be a financial impact on water customers in the Alton area. Lagoons and the alternate residual-handling technologies at the treatment facility are substantially more expensive than the direct discharge option. These additional costs would be passed on to water ratepayers, our local residents.
- 4. Environmental benefits could be lost. While local costs would go up, we would see a negative impact on the environment. In addition to the lagoons and increased traffic, there is a threat to continued maintenance of the Piasa Creek Watershed Project. Illinois American Water has been the primary contributor to the Great Rivers Land Trust's Piasa Creek Watershed Project. Numerous sediment reduction projects have been implemented as a result of the Company's contributions. The sediment reduction projects have benefited our community, which is partially located in the watershed. It is my understanding that eliminating the direct discharge allowance will eliminate the largest funding source for the maintenance/upkeep of these valuable offset projects.

I hope you will consider the benefits to the residents of the City of Alton, as well as our concerns, and approve Illinois American Water's petition for an adjusted standard that allows Illinois American Water to continue to direct discharge river sediment back into the Mississippi River.

Thank you

Don Sandidge Mayor, City of Alton

cc: Senator William Haine Representative Dan Beiser