

GREAT RIVERS LAND TRUST

P.O. Box 821
(p) 618-467-2265

Alton, IL 62002
(f) 618-466-6167

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MAY 21 2007

STATE OF ILLINOIS
Pollution Control Board

May 15, 2007

ORIGINAL

Illinois Pollution Control Board
Attention: Clerk
100 West Randolph St.
James R. Thompson Ctr., Ste. 11-500
Chicago IL 60601-3218

PC#5
AS07-2

To Whom It May Concern:

The Piasa Creek Watershed Project, which has an objective of reducing sedimentation in the 78,000 acre Piasa Creek Watershed, is located in portions of Jersey, Madison, and Macoupin counties. In 2001, Great Rivers Land Trust (GRLT) and Illinois-American entered into an agreement to begin implementation of this non-point source reduction project, and the Illinois Pollution Control Board (IPCB) approved this agreement. In return for providing funding for the ten-year life of the project, Illinois-American was granted an Adjusted Standard by the IPCB, which authorizes Illinois-American to discharge effluent into the Mississippi. Also in return for its funding, Illinois-American received a discharge permit by the Illinois Environmental Protection Agency (IEPA). All terms of the agreement between GRLT and Illinois-American have been satisfied to date and the project has exceeded its goals. GRLT and Illinois-American were both under the impression that if the project approved by the IPCB was successful in its first five years, it would continue for the duration of the ten-year contract. To consider any other line of action at this time would be counter-productive to all parties involved, including the state of Illinois.

The benefits of completing the project go far beyond the sediment reduction of this innovative water quality trading effort that has been implemented. The project has provided financial incentives to farmers and landowners who otherwise would not have been able to afford to construct desperately needed erosion control structures on their land. The improvements also increase productivity in a struggling agricultural industry. GRLT combined the funding from Illinois-American with other funds from foundation grants, program funds, and in-kind services that pumped millions of dollars back into the local economy. The money also went towards jobs, contractors, and goods and services purchased locally. Project funding was used to restore the Boy Scout Lake at Camp Warren Levis in Godfrey. In exchange for the restoration of the lake, the Scouts agreed to a conservation easement of the entire 253-acre site, part of the riparian corridor of the Piasa Creek. The project included a fifteen-acre wetland enhancement structure above the lake to trap sediment.

Another noteworthy aspect includes the added stormwater retention space that is a secondary benefit of the project. The primary purpose of the numerous retention structures is sediment

control, but they also retain stormwater that in turn reduces flash flooding and streambank degradation. The protected riparian corridors serve as a filter to the streams that trap sediment and provide enhanced habitat for wildlife. The reduction of sediment in the streams will also improve the habitat for aquatic flora and fauna. The above-mentioned benefits are all in addition to the ultimate goal of a cleaner Mississippi River. If the Piasa Creek Watershed Project were terminated, all of these benefits would be lost and the work to date would have been in vain.

The alternative to the PCWP is burdened with negative issues. If Illinois-American were forced to eliminate their point discharge at their water plant in Alton, Illinois, they would be required to construct sediment lagoons to trap sediment. Such a facility would cost millions of dollars to construct and over \$420,000 a year to maintain. Operation of such a facility would involve dredging material from the lagoons, loading it on trucks, and transporting the material to a special waste landfill. In addition to the transportation costs, there would also be tipping fees, at the landfill, it would consume precious landfill space and the parade of trucks would create wear on the roads. It can only be assumed that the additional costs of construction, maintenance, and operation of the additional facility will be passed along to the customers of the water company. The road in question is the National Great Rivers Scenic By-way, recently named one to the Seven Wonders of Illinois. The increase of trucks on this tourist destination creates a safety issue, and added emissions from the truck exhausts. Neighbors near the proposed lagoon site have concerns over odors and aesthetics. To add injury to insult, the end result is a dirtier Mississippi River. The U.S. EPA is promoting water quality trading initiatives across the country. There are only a handful of successful water quality trading projects in the nation and only one in Illinois, the Piasa Creek Watershed Project. The Illinois EPA should be embracing and promoting the project and positioning Illinois as a leader in creative environmental solutions instead of taking a counterproductive approach toward water quality improvement.

Methods of implementing the project include the construction of rural sediment basins, retention basins, urban water detention/retention basins and other best management practices. GRLT has implemented riparian treatment measures including riparian corridor protection and restoration, streambank stabilization, sedimentation reduction, and wetland restoration. In addition, GRLT has acquired property from willing sellers and donors and established conservation easements on property in a targeted area along the riparian corridor of Piasa Creek. Finally, GRLT has helped implement the project by working to educate area residents and students on the importance of watershed planning, how it affects water quality, erosion, and storm water management. It also encourages participation by area land owners, farmers, community leaders, and other residents in the watershed.

The project's goal is to reduce sedimentation in the Piasa Creek Watershed by approximately 6,600 tons of soil per year by the year 2010. This annual offset of 2:1 will prevent two tons of soil from entering the Mississippi River for every one-ton of Total Suspended Solids that Illinois-American's Alton water treatment plant is anticipated to discharge into the River each year.

The project has achieved a savings level of approximately 6,691 tons of soil annually. Over 200 erosion reduction structures have been completed at various locations throughout the watershed. However, as part of the project, GRLT is working on other active and pending soil conservation projects that will benefit the Piasa Creek Watershed. These projects are at various stages of

completion. In addition, GRLT has received numerous requests from nearby landowners interested in participating in the project. When the project is completed in 2010, it is estimated that at least 10,000 tons of soil will be saved.

The erosion reductions achieved by the Piasa Creek Watershed Project will repeat year after year provided that certain stewardship activities are completed. GRLT plans to develop a strategy of long-term funding for stewardship of certain projects designed to control erosion and trap sediment. The soil loss reductions achieved by the project will be sustained above 6,600 if these stewardship activities are performed on properties owned, leased or under cooperative agreement with GRLT. Additional funding by Illinois-American will be required for some period of time after the expiration of the ten-year agreement in 2010 between Illinois-American and GRLT, but the project is expected to reach a point at which it will be sustainable without future funding from outside sources. Illinois-American has expressed its willingness to contribute funds for sustainability beyond 2010 if the IPCB will extend the Adjusted Standard it granted to Illinois-American in 2000.

A document entitled Piasa Creek Watershed Project Report has been developed by GRLT. The PCWP Report contains information on the project's background and goals, detailed information on specific projects such as the Boy Scout Lake Project, the quarterly and annual reports submitted to IEPA, and a chart summarizing the soil savings achieved by each individual project. It is an evolving document that is updated as new information becomes available. All numbers set forth in the PCWP Report are based on calculations used by the U.S. Department of Agriculture (USDA) and are consistent with industry standards. Illinois EPA has reviewed and endorsed the calculation methods utilized by the Project and the implementation Plan. Piasa Creek Watershed Project's implementation plan has been incorporated into the Village of Godfrey's Phase II stormwater rules and Jersey County's Land Use Plan, as well.

GRLT has received numerous awards in recognition of the project's success. These awards include the Illinois Governor's Pollution Prevention Award for the Community Group Category, which is awarded by the Illinois Waste Management and Research Center ("WMRC") and the Illinois Governor's office to one organization that has helped the environment and the economy of Illinois by successfully reducing the generation of gaseous, liquid, and solid waste; the Innovate Illinois Award, which is awarded each year by WMRC and the Illinois Governor's office to one business or organization that has implemented a novel technology or process modification that leads to significant waste reduction or elimination; the Illinois Buffer Partnership Award, which is awarded by Trees Forever to one business or organization that has improved water quality and promoted land stewardship, as well as the Trees Forever National Award for the Business/Education/Nonprofit Category, which is awarded to one recipient of an award from a Trees Forever at the state level; a National Resource Conservation Service's Conservation Academy Award, which is awarded in recognition of conservation-related achievements; a U.S. Department of Agriculture's Earth Team Volunteer Program Award, which is awarded to organizations that achieve a certain level of volunteer participation; and one of three Soil and Water Conservation Society's National Merit Awards, which are given in recognition of an outstanding project by an organization that promotes conservation of soil, water, and related natural resources. GRLT has also received an award from the National Parks Service identifying Rocky Fork, a stream in the Piasa Creek Watershed, as a site that makes a significant contribution

to an understanding of the Underground Railroad; this grant makes GRLT eligible for funding to preserve the lands around Rocky Fork.

The project has received considerable attention and acclaim nation-wide as a result of its success. I have spoken about the project at numerous nationwide and statewide events. Notable nationwide events include the National Forum on Synergies Between Water Quality Trading and Wetland Mitigation Banking (Washington, D.C.), at which the Project was presented as a model for water quality trading programs in the United States; the Clean Water, Livable Cities: Models That Work Conference (St. Louis, Missouri), hosted by the U.S. Army Corps of Engineers and the U.S. Environmental Protection Agency; the National Conference on Nonpoint Source Pollution (Chicago, Illinois); the Land Trust Alliance Conference (Providence, Rhode Island); the Upper Mississippi River Water Supplier Coalition (Moline, Illinois); and the Mississippi to the Gulf Coalition (Memphis, Tennessee). Notable statewide events include the Illinois Watershed Conference; the Illinois Department of Natural Resources Conservation Conference; the Illinois Landmark Preservation Council Statewide Conference; the University of Illinois's Watershed Academy; and the Illinois River Coordinating Council Conference. In addition, I have given presentations at various colleges and universities, including Southern Illinois University (Edwardsville); Principia College; University of Missouri (St. Louis); Southern Illinois University (Carbondale); and Lewis & Clark Community College. I and other individuals responsible for implementation of the project have also given presentations to an extensive list of local groups. Finally, articles about the project have appeared in a number of national journals and publications, several regional publications, and numerous newspapers, and the project has been the subject of over a dozen technical papers and theses.

The project has met and exceeded all of its goals to date. Interest and participation in the project has been embraced on a local, regional, and national scale. Private foundations, governmental entities, service organizations, and even individuals have partnered in some way to assist in the success of the project. From the environmental perspective, the project has done exactly what it was intended to do — to reduce sediment input into the Mississippi River. The project's positive effects go far beyond the innovative water quality trading aspect; benefits of the project include reduced erosion, improved water quality, stormwater control, reduction of flash flooding, enhanced fish and wildlife habitat, protection of sensitive ecosystems, public education on watershed management, and financial incentives to farmers and landowners to implement conservation practices. **On behalf of Great Rivers Land Trust, I strongly support Illinois-American's petition for an extension of Adjusted Standard 99-6.**

Sincerely,



Alley Ringhausen, Executive Director
Great Rivers Land Trust