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STATE OF ILLINOIS
Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
REVISIONS TO ANTIDegradation) R01-13
RULES. 35 ILL.ADM. CODE 302.105, 303.206,)
AND 106.990-106. 995.)

NOTICE OF FILING


TO: Ms. Dorothy M. Gunn Clerk of the Board Illinois Pollution Control Board James R. Thompson Center 100 West Randolph Street Suite 11-500 Chicago, Illinois 60601	Marie Tipsord, Esq. Attorney Illinois Pollution Control Board James R. Thompson Center 100 West Randolph Street Suite 11-500 Chicago, Illinois 60601
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(PERSONS ON ATTACHED SERVICE LIST)

PLEASE TAKE NOTICE that I have filed today with the Clerk of the Illinois Pollution Control Board an original and nine copies of the TESTIMONY OF DAVID L. THOMAS OF THE ILLINOIS DEPARTMENT OF NATURAL RESOURCES, ON THE ABOVE CAPTIONED MATTER, copies of which are herewith served upon you.

Respectfully submitted,

ILLINOIS DEPARTMENT OF
NATURAL RESOURCES,

By: Stanley Yonkauski, Jr.
One of Its Attorneys 

January 19, 2001

Stanley Yonkauski, Jr.
Legal Counsel
Illinois Department of Natural Resources
524 South Second Street, LTP
Springfield, Illinois 62701-1787
(217) 782-1809

TESTIMONY BEFORE THE POLLUTION CONTROL BOARD

OUTSTANDING RESOURCE WATERS (ORWs)

David L. Thomas, Chief

Illinois Natural History Survey
Champaign, IL

INTRODUCTION

The testimony presented here today provides information on streams of the state that could be classified as Outstanding Resource Waters (ORW's). I will also like to take the opportunity to express some concerns with the overall process by which waters would be designated "outstanding water resources" especially with regard to economic considerations. We also know that Illinois has significant and outstanding recreational waters which can be considered ORW's. Illinois' boundary rivers (Mississippi, Ohio and Wabash Rivers) and streams (Illinois River and its backwaters, and other large rivers and creeks) provide 27% of the total number of fishing days and \$1 billion of the \$3.76 billion statewide fishing economic impact. However, we have not analyzed the data sufficiently to identify specific recreational streams for inclusion as ORW's at this time.

The Department applauds the intended purpose of this proposed rule to "maintain high quality waters and to prevent unnecessary deterioration of waters of the State." However I want to express some concerns with the overall process by which waters would be designated "outstanding water resources" especially with regard to economic considerations.

These proposed rules require petitions to designate waters or water segments as an outstanding resource waters (ORW) to include information on the benefits and economic impacts of such a designation. More specifically, Section 106.994 (d) requires "a statement supporting the designation including, but not limited to, the health, environmental, recreational, aesthetic or economic benefits of the designation." Subsection (e) requires "a statement identifying the ORW designation's anticipated impact on economic and social development." This is to include the impacts on the regional economy and regional employment, based on "current verifiable information," and "a comparison of the health and environmental impacts to the economic impacts of an ORW designation." While the proposed rule only requires "statements" on the various benefits and economic impacts, it will take extensive analysis and access to data not readily available to the public for such statements to have any meaning.

The economic impact side of the ORW designation needs to include at a minimum; cost figures, changes in income, changes in revenue, changes in employment, impacts on different economic sectors, and impacts on local government such as infrastructure and revenue. The prediction of future economic opportunities is highly subjective, which will result in challenges to whatever the results are of the economic statements provided by a petitioner.

An examination of the benefits of an ORW designation would entail site specific studies and surveys on the value of difficult to calculate benefits such as aesthetic, environmental, recreational, and health. Such studies take significant resources to complete and even then there can be strong disagreements on the validity of such analysis in a hearing before the Pollution Control Board. Consequently, this can be a burdensome process for individuals and organizations that want to petition for ORW designation, requiring extensive technical and legal support for each ORW designation petition. Designation of an ORW should be based on water quality, biological criteria and significant recreational resources; adding an economic analysis requirement may make it impossible to designate an ORW.

The identification of streams of "exceptional ecological significance" is based on extensive biological collections made over many years by the Illinois Natural History Survey (INHS). A 1992 report listed 132 streams or stream segments as biologically significant (cited below). Additional streams meeting the criteria for listing as biologically significant have been identified from data collected since the publication of the 1992 report. Also some of the streams identified in the 1992 report no longer meet the criteria and will be downgraded. Working from the 1992 list, we added new information obtained since the publication of the report, and identified a subset of 45 streams or stream segments of exceptional ecological significance. Within the list of 45 streams or stream segments we have identified 25 that warrant special attention because they harbor extant populations of threatened and endangered species.

We are not prepared at this time to make the case called for in the proposed rules for ORW designation of all 45 streams or stream segments that we have identified with threatened and endangered species or high quality habitat, we do feel that these streams deserve some extra protection from the state. Some of the T&E species could be threatened by waters that just meet water quality standards. Based on data related to changes in the distribution and abundance of some of our state's threatened and endangered species, populations are disappearing from our waters. It therefore appears that ORW designation may be necessary to maintain these populations.

We have identified below four streams that we believe need immediate protection afforded by designation as ORW's. These include the Middle Branch North Fork Vermilion River Drainage, the Middle Fork Vermilion River (which runs through state land for much of its length and is Illinois' only nationally designated wild and scenic river), Lusk Creek, and Big Creek (both of which are in the Shawnee National Forest). All four of the streams have state endangered species and the Middle Branch North Fork

also has a federally endangered mussel. Based upon our review, we know of no current discharges with NPDES permits in these streams segments.

Below is a more detailed description of the four streams we are proposing for immediate ORW designation plus a list of 41 streams or stream segments (culled from the larger list of biologically significant streams and others with high biodiversity) that may warrant listing as ORW's in the future.

ILLINOIS STREAMS IN NEED OF PROTECTION

In drafting the present list of streams we drew from two data sets: the Biologically Significant Streams Report (Page et al. 1992) (a copy of this report is attached to this testimony) and an EPT index, both of which are discussed below.

Biologically Significant Streams: Illinois has over 2700 named streams that make up more than 26,000 miles of inland watercourses. In 1992, biologists from the Center for Biodiversity of the Illinois Natural History Survey published a report entitled *Biologically Significant Illinois Streams: An Evaluation of the streams of Illinois based on Aquatic Biodiversity* (Page et al. 1992). The objective of the study was to identify the state's most biologically significant streams so that protection efforts could be concentrated on a manageable number of streams. The report was designed to supplement an earlier and continuing study to identify high quality streams called the *Biological Stream Characterization* or BSC. The BSC is a stream-quality index developed by the Illinois Department of Natural Resources and Illinois Environmental Protection Agency to categorize streams based largely upon fish populations, water quality, and selected aquatic macroinvertebrates.

In the Biologically Significant Streams report, data on freshwater mussel diversity and threatened and endangered species were used to expand the list of streams identified by the BSC as those most important to protect and manage for their outstanding biological characteristics. Those sites in common or overlapping in the Biologically Significant Streams study and the BSC rank among the best in Illinois. The specific criteria used to identify biologically significant streams were:

1. Streams that supported populations of federal or state watch list, threatened or endangered species of plants, mussels, crustaceans, or fishes.
2. Streams with high mussel diversity. High diversity mussel streams or stream segments were defined as those with more than ten live species or those with a Shannon-Weaver Diversity index greater than 2.5. The use of mussel diversity was limited to only those streams where we had recent (post-1976) data (Kaskaskia, Kankakee, Sangamon, Mackinaw, Vermilion, Embarras, Little Wabash, and Wabash rivers).

One hundred and eight streams that met the above criteria were identified. These streams plus the 24 streams identified as "A" streams in the BSC classification brought to 132 the

number of biologically significant streams recognized. Data collected since 1993 on the aquatic fauna of Illinois indicate that additional streams or stream segments meet the above criteria or contain exceptional biodiversity. However, we have not yet analyzed the data in order to identify those streams at this time.

High EPT Streams: In addition to the biologically significant streams identified in the 1992 report, other streams were considered of exceptional ecological significance based on the presence of species, or communities of sensitive aquatic insects. The three orders of aquatic insects that are most sensitive to environmental degradation are the Ephemeroptera (mayflies), Plecoptera (stoneflies), and Trichoptera (caddisflies) – species richness of all at a site has been used as an effective index of stream health, the EPT index. Dr. Donald Webb and Dr. R. Edward DeWalt, also of INHS-CBD, have sampled throughout the state for Ephemeroptera, Plecoptera, and Trichoptera. Streams were selected on the basis of high EPT species richness (sheer numbers of species) or presence of a few exceedingly sensitive or very rare species. These streams are noteworthy in that they also have high habitat quality. The two, habitat quality and EPT richness, often are highly correlated.

The INHS / DNR has identified streams which we feel meet the "uniquely high biological quality" criteria for ORW designation. These streams were selected from the 132 identified in the 1992 report of Page et al. or added based on new data collected since that report. Although other streams or segments identified in the 1992 report may meet one or more of the above criteria they were not selected for special mention because habitat quality may not be high enough to support sensitive species long-term. For example, some state endangered species still survive in streams that have been severely modified from channelization and habitat quality may not be sufficient to sustain the populations over time. Below are the streams or stream segments we have identified of exceptional biological significance that

1. Should be considered for ORW designation as part of the Board's current proceedings.
(4 Streams)
2. Those streams that may be future ORW candidates based on the presence of threatened or endangered species (plants, mussels, crustaceans, or fishes) and high quality habitat.
(21 Streams)
3. Those streams that may be ORW candidates based on the outstanding habitat and high diversity (fishes, mussels, crustaceans, or EPT species).
(20 Streams)

The specific criteria used to select each stream in the list below are given in parentheses. The first four streams on the list are in need of immediate ORW designation and the supporting data for their listing follows. The next 21 streams on the list are those that have extant populations of threatened or endangered species and therefore warrant special consideration. The remaining 20 streams are those with diverse EPT taxa or an

exceptionally high diversity of mussels, crustaceans or fishes. The list begins with streams in the northern part of Illinois and generally proceeds to the south. Additional data, from the BSC or other sources, may result in some modifications of the list; however, all of these streams remain highly biologically significant and should be protected from degradation.

1. STREAMS PROPOSED FOR IMMEDIATE ORW DESIGNATION (4 streams)

Below are the four streams we are proposing for inclusion in Section 303.206 (list of Outstanding Resource Waters).

A. MIDDLE BRANCH NORTH FORK VERMILION RIVER DRAINAGE

(Federally endangered mussel; state threatened and endangered fishes and mussels; high mussel diversity)

Based on historical occurrences, the North Fork Vermilion River supported more state threatened or endangered species than any other stream in Illinois (Illinois Endangered Species Protection Board. 1993. Highest priority streams/lakes for the conservation of aquatic endangered and threatened species in Illinois. Springfield, Illinois. 7 pp.). Freshwater mussels have been decimated throughout the eastern United States and may be the most endangered group of animals in North America. Records from the Illinois Natural History Survey indicate that the North Fork Vermilion River drainage historically supported a diverse mussel fauna of at least 30 species, over a third (12) of which are currently threatened or endangered. The only remaining Illinois populations of the federally endangered clubshell (*Pleurobema clava*) and the state endangered rainbow (*Villosa iris*) survive in the North Fork. The river also likely supports the last reproducing populations of the state endangered rabbitsfoot (*Quadrula cylindrica*) and purple lilliput (*Toxolasma lividus*) in Illinois. Additionally, the state endangered eastern sand darter (*Ammocrypta pellucida*) and bigeye shiner (*Notropis boops*) occur in the North Fork.

In terms of water quality, the Illinois Environmental Protection Agency (1996) rated the North Fork Vermilion River as "Full Use Support" and the Biological Streams Characterization rated the North Fork from the Illinois-Indiana state line to Panther Creek and from Lake Vermilion to the Vermilion River as a "B" Stream (Highly Valued Aquatic Resource). The North Fork Vermilion River from Lake Vermilion upstream to the Illinois State line has been classified a Biologically Significant Stream in Illinois.

The Middle Branch is the largest tributary of the North Fork Vermilion River. The Middle Branch is 17.3 miles (27.8 km) in length and drains an area of 43 mi² (57 km²) in Illinois. A survey of the mussel fauna of the Middle Branch was conducted in 1996-98. In that survey 22 of the 30 known species from the North Fork drainage were found alive including one federally endangered, five state endangered and two state threatened species. Based on comparisons with other Illinois drainages, the Middle Branch supports one of the most diverse mussel faunas in Illinois. Species richness is comparable to other basins with much larger drainage area. By way of comparison the Middle Branch supports only 4 fewer mussel species than the ENTIRE Illinois River mainstream. With

the exception of the entire Vermilion River watershed, the Middle Branch supports more rare species than any other drainage in Illinois regardless of size.

The presence of the federally endangered clubshell in the Middle Branch is highly significant. The clubshell was historically widespread and abundant in the Ohio River basin of Illinois, Kentucky, Indiana, Ohio, Michigan, Pennsylvania, Tennessee, and West Virginia. It has been documented from 94 river systems but currently survives in only 9. The clubshell was formerly abundant in the Wabash River. However, surveys in 1987, 1988, and 1996 at over 50 sites yielded no live or fresh-dead clubshells and it is believed to have been extirpated from the mainstream of the Wabash River. It is clear that current water quality standards have not been sufficient in protecting this species from near extinction. Any lowering of the water quality in the Middle Branch from current levels would likely be detrimental to this species.

The fish fauna of the Middle Branch Vermilion River drainage is also diverse. Forty species (about 22% of the state's fauna) have been reported from the basin and others likely occur there. Included among the 40 is the state endangered bigeye shiner and state threatened eastern sand darter.

B. MIDDLE FORK VERMILION RIVER

From the mouth to Champaign / Ford County line
(Endangered mussels and fishes, high mussel diversity, BSC "A" stream)

The Middle Fork originates in Livingston County, has a substrate of predominantly sand and gravel with some rubble, is 83 miles long, and has a drainage area of 438 square miles. The Illinois Water Quality Report (IEPA, 1990) rated the Middle Fork Vermilion River as "Full Support." The Biological Stream Characterization (Hite and Bertrand, 1989) rated the Middle Fork of the Vermilion River from Knights Branch to its mouth as an "A" stream (Unique Aquatic Resource).

Seventy-four species of fishes are known from the Middle Fork Vermilion River drainage. State endangered fishes include the bigeye chub, *Hybopsis amblops*, bigeye shiner, *Notropis boops*, and the bluebreast darter, *Etheostoma camurum*. State threatened species are the eastern sand darter, *Ammocrypta pellucidum* and the river redhorse, *Moxostoma carinatum*.

Thirty-three species of mussels have been reported from Middle Fork Vermilion River drainage. The Middle Fork Vermilion River drainage has historically supported 14 special status species including four state threatened and ten state endangered species.

C. LUSK CREEK

Headwaters to confluence with Flick Creek, Pope County
(Endangered fish crustacean, and plant, High EPT species richness, The premier stream for EPT in the state of Illinois, high habitat quality)

Lusk Creek rises near Delwood, drains 88 square miles of northeastern Pope County, and empties into the Ohio River at Golconda. Lusk Creek is 25 miles in length and averages 23 feet wide. The stream has cut through massive sandstone, carving a canyon with cliffs that vary from only a few feet to nearly 100 feet high. The creek is shallow in some areas and flows swiftly around numerous rock and gravelly riffles. In other areas the water is deep and forms quiet pools. Lusk Creek is one of the more aesthetic streams in Illinois.

In the Illinois Water Quality Report (IEPA, 1990) rated Lusk Creek as "Full Support." The Biological Stream Characterization rated Lusk Creek from Little Lusk Creek to Manson Fork as an "A" Stream (Unique Aquatic Resource). Smith (1971) rated Lusk, and Big creeks as "Excellent" to "Good" with Big Creek and Lusk Creek as the "Outstanding" streams in southern Illinois

Lusk Creek is a rocky, spring-fed stream traversing wooded uplands. Springs and caves throughout the system add to the high biological diversity of the system and provide habitats for species unknown elsewhere in Illinois, including the state endangered amphipod, *Crangonyx anomalus*. The state threatened least brook lamprey, *Lampetra aepyptera*, is also known from Lusk Creek.

Lusk Creek in Pope has the most diverse species rich fauna of Ephemeroptera, Plecoptera, and Trichoptera in Illinois. Within this small drainage 20 species of Ephemeroptera, 23 species of Plecoptera, and 22 species of Trichoptera have been recorded. The diversity of EPT species in Lusk Creek is exceptional and is about five times as rich as the average Illinois stream

D. BIG CREEK

Hardin County

(Endangered fish and crayfishes)

Big Creek is a beautiful, clear, rocky, spring-fed stream that flows through limestone formations of Shawnee Hills in western Hardin County. Big Creek has a drainage area of 43 square miles, a length of 20 miles, and an average width of 40-60 feet. The stream enters the Ohio River 0.5 miles below Elizabethtown. Three habitats predominate—course gravel riffles, shallow slab rock pools with a gravel substrate, and deeper sand and gravel bottom pools. The water is fed by many springs so it is usually clear and cool. The clear cool water provides a stream environment suitable for fauna that is intolerant of sluggish, silty, warm waters. Big Creek with its hilly scenery and diverse biota is a near facsimile of an Appalachian stream. Tributaries have gravel substrates and large influxes of spring water. The drainage basin includes forested land, pastures, and some row crops. Parts of the basin are owned by the U.S. Forest Service and afforded some protection.

The Illinois Water Quality Report (IEPA, 1990) rated Lusk Creek as "Full Support." The Biological Stream Characterization rated Big Creek upstream from Hogthief Creek as an "A" Stream (Unique Aquatic Resource).

Fifty-five species of fishes are known from the Big Creek drainage. State listed fishes include the endangered bigeye shiner, *Notropis boops*, and the state threatened least brook lamprey, *Lampetra aepyptera*.

The state endangered crayfish, *Orconectes kentuckiensis*, exists in three streams in Hardin County: Big, Hosick, and Peters creeks. The state endangered crayfish *Orconectes placidus* also occurs in Big Creek and sporadically in the Ohio and Mississippi rivers.

2. ORW CANDIDATE STREAMS BASED ON THE PRESENCE OF THREATENED OR ENDANGERED SPECIES (21 streams)

MISSISSIPPI RIVER AND SMALL DIRECT TRIBUTARIES

- A. Mississippi River
 - Rock Island County
 - (Endangered fishes and mussels, high mussel diversity)
- B. Miller Creek
 - Alexander County
 - (Endangered fish, BSC Class "A" Stream)

ROCK RIVER BASIN

- C. Raccoon Creek
 - Winnebago County
 - (Endangered fish)

FOX RIVER BASIN

- D. Lower Fox River
 - Morgan Cr. to confluence with the Illinois R., Kendall and LaSalle counties
 - (Endangered fishes)

KANKAKEE RIVER BASIN

- E. Kankakee River
 - From Momence to the Des Plaines Wildlife Conservation Area, Will Co.
 - (Endangered fishes and mussels, high mussel diversity)

VERMILION RIVER BASIN

- F. Mud Creek
 - Livingston County
 - (Endangered fish)

MACKINAW RIVER BASIN

- G. Mackinaw River
 - From Colfax to Tazewell County line
 - (Endangered fishes and mussels, high mussel diversity)

SANGAMON RIVER BASIN

- H. Sangamon River

From its source to the Piatt/Macon County line
(Endangered mussels, high mussel diversity, high EPT richness and
habitat quality)

I. Salt Creek

Clinton Lake to Kickapoo Creek
(Endangered mussels, high mussel diversity)

KASKASKIA RIVER BASIN

J. Kaskaskia River

Ill. Rt. 16/128 to Howe Creek, Shelby County
(Endangered fish, high mussel diversity)

VERMILION RIVER BASIN

K. North Fork Vermilion River

Lake Vermilion upstream to Illinois State line, Vermilion County
(Endangered fishes and mussels, high mussel diversity)

L. Salt Fork Vermilion River

From the Champaign County line to the Middle Fork
(Endangered fishes and mussels, high mussel diversity)

EMBARRAS RIVER BASIN

M. Embarras River

From the Douglas / Coles Co. line south to Cumberland, Co. line
(Endangered fishes and mussels, high mussel diversity, High EPT species
richness and habitat quality, in top 95th percentile for EPT and top 80th
percentile for habitat)

LITTLE WABASH RIVER BASIN

N. Little Wabash River

Rt. 50 to the mouth, Clay, Edwards, Gallatin, Richland, Wayne, and White
Counties
(Endangered fishes and mussels, high mussel diversity)

WABASH RIVER AND DIRECT TRIBUTARIES

O. Wabash River

New Harmony, Indiana to the Ohio River, White County
(Federally endangered mussels and endangered fishes)

P. Little Vermilion River

Vermilion County to the state line
(Endangered fishes and mussels, high mussel diversity, EPT richness and
habitat quality in top 90th percentile)

OHIO RIVER AND DIRECT TRIBUTARIES

Q. Ohio River

Lock and Dam 53 to Mound City, Pulaski County

(Endangered mussels and crayfish, high mussel diversity)

- R. Big Grand Pierre Creek
Rt. 146 to Pinhook Creek, Pope County
(Endangered mussel, high mussel diversity)

CACHE RIVER BASIN

- S. Cache River
From Big Creek to Karnak, Johnson / Pulaski Counties
(Endangered fish)
- T. Horseshoe Lake / Lake Creek
Alexander County
(Endangered fishes, endangered crayfish, high fish diversity)

SALINE RIVER BASIN

- U. Sugar Creek (Saline River Drainage)
2.5 miles above and below Rt. 166, Williamson County
(Endangered fish, endangered crayfish)

3. ORW CANDIDATE STREAMS BASED ON HIGH DIVERSITY FISHES, MUSSELS, CRUSTACEANS, OR EPT TAXA OR OUTSTANDING HABITAT (20 streams)

ROCK RIVER BASIN

- A. Kishwaukee River.
Boone, McHenry and Winnebago counties
(High mussel diversity, BSC "A" stream)
- B. Sugar River
Wisconsin state line to confl. with Pecatonica River, Winnebago County
(High EPT species richness, high habitat quality)
- C. South Branch Kinnikinnick Creek
Caledonia Rd downstream to I-90/US-51 overpass, Boone/Winnebago Cos.
(High EPT species richness and habitat quality >85th percentile)

FOX RIVER BASIN

- D. North Branch Nippersink Creek
From Wisconsin border to Nippersink Creek
(High mussel diversity)
- E. Tyler Creek
Upstream of Randall Rd. to Big Timber Road, Kane County
(High EPT species richness and habitat quality in the top 85th percentile)
- F. Ferson Creek
Two kilometers W Randall Rd to 200 m downstream of same, Kane County

(High EPT species richness and habitat quality, in top 85th percentile)

DES PLAINES RIVER BASIN

- G. Jackson Creek (Kankakee River Drainage)
Entire reach within Midewin National Tallgrass Prairie, Will County
(EPT species richness and habitat quality scores in the top 90th percentile)

MACKINAW RIVER BASIN

- H. Panther Creek
Rt. 24 to the confluence with Mackinaw River, Woodford County
(high mussel diversity)

SANGAMON RIVER BASIN

- I. Sugar Creek (Sangamon River Drainage)
McLean/Logan County line to Ill. Rt. 121
(High mussel diversity, High EPT species richness, habitat quality, and
Hilsenhoff Biotic index scores all in top 90th percentile for streams in
Illinois)
- J. Lone Tree Creek
Clinton Lake to Kickapoo Creek
(high mussel diversity)

VERMILION RIVER BASIN

- K. Jordan Creek
Vermilion County
(Endangered fish)
- L. Stony Creek
Vermilion County
(Endangered mussel and amphibian)

OHIO OR MISSISSIPPI RIVER TRIBUTARIES

- M. Bay Creek
From the headwaters to Ill. Rt. 147, Pope County
(High EPT species richness, habitat quality in 99th percentile).
- N. Clifty Creek
Upstream of Old Metropolis Road, Johnson County
(High EPT species richness and habitat quality)
- O. Hutchins Creek (Clear Creek Drainage)
Headwaters to confluence with Clear Creek, Union County
(High EPT species richness)
- P. Simmons Creek
Headwaters to confluence with Big Grand Pierre Creek, Pope County
(High EPT species richness and habitat quality)

SALINE RIVER BASIN

- Q. Little Saline River

Pope/Johnson County line to Saline/Pope County line.
(High EPT species richness and habitat quality)

R. Burden Branch

Headwaters to confluence with Little Saline River, Pope County
(High EPT species richness and habitat quality)

S. Battle Ford Creek

Headwaters to Shawnee National Forest Boundary, Pope and Saline Cos.
(Presence of rare and environmentally sensitive stonefly species)

CACHE RIVER BASIN

T. Lick Creek

Headwaters to I-57 overpass, Union County
(High EPT species richness and habitat quality)

This concludes my testimony.

CERTIFICATE OF SERVICE

I Stanley Yonkauski, Jr., the undersigned, certify that I have served a copy of the attached TESTIMONY OF DAVID L. THOMAS OF THE ILLINOIS DEPARTMENT OF NATURAL RESOURCES ,in the matter of revisions to antidegradation rules upon:

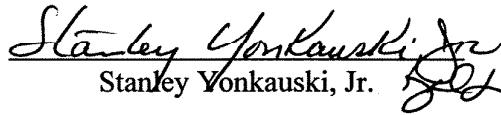
Ms. Dorothy M. Gunn
Clerk of the Board
James R. Thompson Center
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

in person

January 19, 2001; and upon

(SEE ATTACHED SERVICE LIST)

by depositing copies of said documents in the United States Mail in Springfield, Illinois
on January 19, 2001.


Stanley Yonkauski, Jr.

RO1-13
SERVICE LIST

Richard Acker
Openlands Project
25 E. Washington Street, Suite 1650
Chicago, Illinois 60602

Kay Anderson
American Bottoms RWTF
One American Bottoms Road
Sauget, Illinois 62201

Fredric P. Andes
Barnes & Thornburg
2600 Chase Plaza
10 South LaSalle Street
Chicago, Illinois 60603

Karen L. Bernotelt
IL Environmental Regulatory Group
215 East Adams Street
Springfield, Illinois 62701-1199

Chris Bianco
Chemical Industry Council
9801 West Higgins Road, Suite 515
Rosemont, Illinois 60018

Christine Bucko
AAG
188 West Randolph, 20th Floor
Chicago, Illinois 60601

Bill Compton
Caterpillar, Inc.
100 N. E. Adams Street
Peoria, Illinois 61629-3350

Jack Darin
Sierra Club, Illinois Chapter
200 N. Michigan, Suite 505
Chicago, Illinois 60601

Albert Ettinger
Environmental Law & Policy Center
35 E. Wacker Drive, Suite 1300
Chicago, Illinois 60601-2110

Susan M. Franzetti
Sonnenschein Nath & Rosenthal
8000 Sears Tower
233 S. Wacker Drive
Chicago, Illinois 60606

Daniel J. Goodwin
Goodwin Environmental Consultants, Inc.
400 Bruns Lane
Springfield, Illinois 62702

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

James T. Harrington
Ross & Hardies
150 N. Michigan, Suite 2500
Chicago, Illinois 60601

John M. Heyde
Sidley & Austin
Bank One Plaza
10 South Dearborn Street
Chicago, Illinois 60603

Ron Hill
Metropolitan Water Reclamation District
100 East Erie
Chicago, Illinois 60611

Katherine Hodge
Hodge & Dwyer
808 South Second Street
Springfield, Illinois 62704

RO1-13
SERVICE LIST

Richard J. Kissel
Gardner, Carton & Douglas
321 North Clark Street, Suite 3400
Chicago, Illinois 60610

Sharon Neal
ComEd - Unicaom
Law Department
125 South Clark Street
Chicago, Illinois 60603

Jerry Paulson
McHenry County Defenders
804 Reginact
Woodstock, Illinois 60098

Paul Pederson
Nalco Chemical
6216 West 66th Place
Chicago, Illinois 60638

Irwin Polls
Metropolitan Water Reclamation
Environmental Monitoring
6001 West Pershing Road
Cicero, Illinois 60804-4112

Nancy J. Rich
Katten Muchin Zavis
525 West Monroe Street, Suite 1600
Chicago, Illinois 60661-3693

Cindy Skrudkrud
4209 West Solon Road
Richmond, Illinois 60071

Jeffrey Smith
Abbott Labs
1401 N. Sheridan Dept 072N, Bldg P14
North Chicago, Illinois 60064-6239

Marie Tipsord
Attorney, Pollution Control Board
100 West Randolph, Suite 11-500
Chicago, Illinois 60601

Connic Tonsor
IEPA - Division of Legal Counsel
P.O. Box 19296
Springfield, Illinois 62702

Philip Twomey
Admiral Environmental Services
2025 S. Arlington Heights Rd, Suite 103
Arlington Heights, Illinois 60005

Georgia Vlahow
Department of the Navy
Naval Training Center
2601 A Paul Jones Street
Great Lakes, Illinois 60088-2845

Jack Welsch
Stateside Associates
2300 Clarendon Blvd., Suite 407
Arlington, Virginia 22201

Charles Wesselhoft
Ross & Hardies
150 North Michigan, Suite 2500
Chicago, Illinois 60601