

DEC 16 2004

STATE OF ILLINOIS
Pollution Control Board

November 29, 2004

Illinois Pollution control Board
600 S. Second Street, Suite 402
Springfield, IL 62704R04-26
PC#13

Dear Sir or Madam:

The Illinois Council of Trout Unlimited (TU) represents approximately 3,000 Trout Unlimited members who reside in Illinois. Nationally TU enjoys 130,000 members who join in the TU mission of conserving, protecting and restoring North America's cold water fisheries and their watersheds.

A proposal by the Illinois EPA now before the Illinois Pollution Control Board would limit phosphorous levels to 1 mg/L (1 mg of phosphorous per each liter of water discharged) in any case where a new or expanding discharge is proposed which would discharge at least one million gallons per day. Your adoption of this proposal will reduce algae and bacteria growth that kills fish and other wildlife and can turn waters into green slime that is undesirable for swimming and other uses. The proposal is very modest, but it represents the first real requirement to reduce phosphorous for discharges to streams in Illinois. Currently only discharges to lakes and tributaries to lakes have to reduce phosphorous. Prairie Rivers, The Sierra Club, and the Environmental Law and Policy Center have been pushing for such a limit for several years and strongly support IEPA's proposal. So too does the Illinois Council of Trout Unlimited.

This proposal is good for water quality and is consistent with, and required under, current laws and regulations. The Clean Water Act and Illinois law requires that NPDES permits control pollutants that may cause or contribute to violations of water quality standards and prohibit allowing new pollution that has not been shown to be necessary. Limits on phosphorous are needed to prevent violations of Illinois water quality standards and comply with antidegradation requirements. Also, controls are needed to prevent violations of the water quality standards regarding offensive conditions, pH and dissolved oxygen.

We urge you to adopt the IEPA proposed interim discharge standard for phosphorous of 1 mg/L.

Sincerely,

James W. Coursey
Chairman- Government Affairs Subcommittee
Illinois Council of Trout Unlimited
6880 N. Wildwood Ave.
Chicago, IL 60646

Cc. Edward L. Michael, Chair The Illinois Council of Trout Unlimited