IEPA Log No.: **C-0092-13**
CoE appl. #: **LRC-2012-00681**

Public Notice Beginning Date: **May 9, 2014**
Public Notice Ending Date: **May 23, 2014**

Section 401 of the Federal Water Pollution Control Act
Amendments of 1972

Section 401 Water Quality Certification to Discharge into Waters of the State

Public Notice/Fact Sheet Issued By:

Illinois Environmental Protection Agency
Bureau of Water
Permit Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
217/782-3362

Name and Address of Discharger: Illinois State Toll Highway Authority – 2700 Ogden Avenue, Downers Grove

Discharge Location: I-90 corridor in the counties of Kane and Cook.

Name of Receiving Water: Multiple

Project Description: Proposed widening and reconstruction of Jane Addams Memorial Tollway (I-90).

The Illinois Environmental Protection Agency (IEPA) has received an application for a Section 401 water quality certification to discharge into the waters of the state associated with a Section 404 permit application received by the U.S. Army Corps of Engineers. The Public Notice period will begin and end on the dates indicated in the heading of this Public Notice. The last day comments will be received will be on the Public Notice period ending date unless a commenter demonstrating the need for additional time requests an extension to this comment period and the request is granted by the IEPA. Interested persons are invited to submit written comments on the project to the IEPA at the above address. Commenters shall provide their names and addresses along with comments on the certification application. Commenters may include a request for public hearing. The certification and notice number(s) must appear on each comment page.

The attached Fact Sheet provides a description of the project and the antidegradation assessment.

The application, Public Notice/Fact Sheet, comments received, and other documents are available for inspection and may be copied at the IEPA at the address shown above between 9:30 a.m. and 3:30 p.m. Monday through Friday when scheduled by the interested person.

If written comments or requests indicate a significant degree of public interest in the certification application, the IEPA may, at its discretion, hold a public hearing. Public notice will be given 30 days before any public hearing. If a Section 401 water quality certification is issued, response to relevant comments will be provided at the time of the certification. For further information, please call Darren Gove at 217/782-3362.

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Fact Sheet for Antidegradation Assessment
For Illinois State Toll Highway Authority
IEPA Log No. C-0092-13
COE Log No. LRC-2012-00681
Contact: Brian Koch (217) 785-4116
Public Notice Start Date: May 9, 2014

The Illinois State Toll Highway Authority ("Applicant") has applied for 401 water quality certification for the proposed fill impacts to 20.05 acres of jurisdictional wetlands and 0.86 acres of streams due to the widening and reconstruction of the Jane Addams Memorial Tollway (I-90) from the Kennedy Expressway (milepost 78.9) to the Illinois Route 25/I-90 East Corridor (milepost 56.1). The existing I-90 Tollway consists of three lanes in each direction, with the mainline separated by a concrete median barrier with full inside and outside shoulders. The proposed project would add a fourth lane in each direction and reconstruct existing lanes, shoulders, and barriers, including a new wider center median. In addition to the fourth through lanes, auxiliary lanes are proposed between Beverly Road and IL 59 (eastbound and westbound), I-290/IL 53 and Arlington Heights Road (eastbound and westbound), Elmhurst Road and the Des Plaines Oasis (eastbound and westbound), and Lee Street and I-294 (eastbound). Two-lane Collector-Distributor roadways are proposed eastbound and westbound just west of Roselle Road through the I-290/IL 53 interchange, and from east of the Des Plaines Oasis to west of the Elmhurst Road interchange.

The aquatic resources to be impacted by the proposed project are of low to moderate quality and would require a mitigation ratio of at least 1.5:1 (minimum of 31.4 acres of mitigation). The Applicant is proposing to provide all stream and wetland mitigation at the Orland Grasslands South Addition, a 162-acre site recently acquired by the Forest Preserve District of Cook County. The wetland mitigation site is located within the Des Plaines River watershed, the same watershed where the majority of fill activities from the proposed project would occur. The site is located south of 179th Street and west of LaGrange Road in Cook County and is located directly south of the existing 960-acre Orland Grasslands, which is owned and maintained by the Forest Preserve District of Cook County. The proposed plan would achieve compensatory mitigation through wetland re-establishment, wetland and creek rehabilitation, stream restoration, and upland prairie buffer establishment. These activities are summarized below and detailed plans are included in the wetland mitigation plan provided by the Applicant. The total wetland mitigation area provided by the proposed mitigation plan is 71.48 acres, which provides 42.01 credits and an overall wetland mitigation ratio of 2.1:1. The stream mitigation provided by the mitigation plan is 6.31 acres/credits, which provides a stream mitigation ratio of 7.33:1. The combined wetland and stream mitigation ratio is 2.31:1.

1. Wetland Re-establishment. The re-establishment of 35.62 acres of wetland at 100% credit would provide 35.62 credits.

1. Wetland and Stream Rehabilitation. The rehabilitation of 7.02 acres of existing wetland and stream at 50% credit would provide 3.51 credits.

2. Stream Mitigation. The restoration of the tributary to the East Branch of Marley Creek at 100% credit would provide 6.31 acres of stream mitigation credits.

3. Upland Buffer. A 100 foot upland buffer would be established which totals 28.84 acres. At 10% credit, the upland buffer would provide 2.88 credits.

Identification and Characterization of the Affected Water Body.

Of the 20.05 acres of wetlands to be impacted, 13.0 acres are under the jurisdiction of USACE/IDNR, and 7.05 are under the jurisdiction of IDNR (isolated wetlands). The majority of the 0.86 acres of stream impacts would be associated with the extensions of pre-existing culverts at the I-90 stream crossings. A summary including the impacted sites, the area impacted and proposed amount of mitigation acreage, and the Floristic Quality Index (FQI) and Native Mean C value (C-Value) of USACE jurisdictional wetland areas is provided in the table below. Sites designated as "ditches" are roadside ditches that met the three wetland criteria (soil, vegetation, and hydrology) but were not connected to a stream or waterway. Mitigation for sites designated as ditches would be provided in the form of wetland creation at a 1.5:1 ratio. A summary of IDNR jurisdictional wetlands (isolated wetlands) is also provided below. Wetland delineations were conducted in June through November of 2012 in accordance with the United States Army Corps of Engineers guidelines (*Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region*).

USACE Jurisdictional Wetland and WOUS Impacts and Mitigation Summary (March 2014)

Site #*	Mile Post	FQI/C-Value	Total Area (Acres)	Total Permanent Impact (Acres)	Total Mitigation (Acres)**
BV3-WL-C-01	59.1	4.5/2.3	0.27	0.15	0.23
BV3-WL-C-02	59.2	1.0/1.0	0.38	0.16	0.24
HDR-WL-C-01	61.5	1.7/0.6	0.43	0.43	0.65
HDR-W-01	61.6	0.0/0.0	0.14	0.08	0.12
HDR-WL-C-03	61.6	1.0/0.5	0.25	0.11	0.17
HDR-WL-C-04	61.7	0.6/0.3	0.11	0.11	0.17
HDR-D-C-03	61.9	1.5/0.4	0.46	0.46	0.69
HDR-W-02	62.0	0.0/0.0	2.8	0.12	0.18
HDR-WL-C-06	62.0	6.5/1.3	5.41	0.03	0.05
HDR-WL-C-07	62.9	1.4/0.4	3.18	1.36	2.04
HDR-D-C-04	63.0	1.0/0.3	1.44	1.44	2.16
HDR-W-03	63.0	0.0/0.0	0.17	0.01	0.02

HDR-WL-C-08	63.6	1.4/0.4	0.36	0.07	0.11
HDR-WL-C-09	63.7	5.7/1.9	0.23	0.23	0.35
HDR-W-04	63.9	0.0/0.0	0.3	0.09	0.14
HDR-WL-C-10	63.9	2.6/0.8	0.13	0.07	0.11
HDR-WL-C-11	63.9	0.6/0.3	0.01	0.01	0.02
HDR-WL-C-12	64.6	3.3/0.9	0.29	0.23	0.35
HDR-WL-C-13	64.6	4.6/1.6	0.1	0.02	0.03
HDR-W-06	64.9	0.0/0.0	0.06	0.02	0.03
HDR-WL-C-14	64.9	4.3/1.1	0.13	0.11	0.17
HDR-W-07	65.0	0.0/0.0	0.39	0.06	0.09
HDR-WL-C-17	65.0	1.6/0.7	0.36	0.26	0.39
HDR-WL-C-18	65.0	2.1/0.8	0.07	0.07	0.11
HDR-WL-C-15	65.1	1.1/0.4	0.18	0.18	0.27
HDR-WL-C-20	65.3	1.3/0.6	0.09	0.05	0.08
HDR-WL-C-22	65.5	1.6/0.4	0.03	0.01	0.02
HDR-WL-C-23	65.5	1.6/0.4	0.14	0.05	0.08
HDR-WL-C-24	65.5	9.6/2.0	0.03	0.03	0.05
HDR-WL-C-25	65.6	2.4/1.0	1.29	0.35	0.53
HDR-WL-C-26	65.8	8.7/1.5	5.78	1.15	1.73
HDR-D-C-08	66.7	5.0/2.5	0.13	0.13	0.20
HDR-D-C-09	66.7	4.1/1..7	0.07	0.07	0.11
HDR-D-C-10	66.7	5.4/1.6	0.08	0.08	0.12
HDR-D-C-11	66.7	4.6/1.1	0.17	0.17	0.26
HDR-W-09	66.7	0.0/0.0	0.36	0.25	0.38
HDR-WL-C-28	66.7	7.9/1.7	0.37	0.37	0.56
HDR-WL-C-	66.8	0.4/0.1	0.67	0.67	1.01

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HDR-WL-C-30	66.8	2.4/1.0	0.37	0.37	0.56
CMT-D-C-03B	69.3	5.0/2.5	0.16	0.16	0.24
CMT-D-C-04	69.3	1.0/0.3	0.28	0.28	0.42
CMT-D-C-06	69.3	5.8/2.6	1.24	0.31	0.47
CMT-D-C-07	69.3	1.0/1.0	0.09	0.09	0.14
CMT-WL-C-03	69.3	0.0/0.0	0.003	0.003	0.00
CMT-D-C-03A	69.5	5.3/2.2	0.05	0.05	0.08
CMT-D-C-08	69.5	1.0/1.0	0.13	0.13	0.20
CMT-D-C-09	69.5	1.4/1.0	0.16	0.16	0.24
CMT-D-C-10	69.5	0.7/0.5	0.14	0.14	0.21
CMT-WL-C-02	69.5	6.0/2.0	0.42	0.42	0.63
CMT-WL-C-04	69.5	3.5/2.5	0.12	0.12	0.18
CMT-WL-C-05	69.5	1.0/1.0	0.06	0.06	0.09
CMT-D-C-11	69.6	4.0/2.3	0.23	0.23	0.35
CMT-WL-C-06	69.6	6.7/3.0	0.05	0.05	0.08
CMT-D-C-13	71.0	4.5/2.0	0.2	0.20	0.30
CMT-WL-C-07	71.1	3.3/1.3	1.35	1.35	2.03
CMT-D-C-02	71.5	1.4/1.0	0.08	0.08	0.12
CMT-D-C-14	71.5	2.1/1.5	0.01	0.01	0.02
CMT-D-C-15	71.5	0.0/0.0	0.13	0.13	0.20
CMT-W-01	71.5	0.0/0.0	0.08	0.08	0.12
CMT-W-02	71.5	0.0/0.0	0.05	0.05	0.08
CMT-WL-C-01	71.5	4.9/1.9	0.006	0.006	0.01
CMT-WL-C-08	71.5	0.0/0.0	0.01	0.01	0.02
AMEC-W-01	76.4	0.0/0.0	0.16	0.01	0.02
AMEC-W-03	78.1	0.0/0.0	0.57	0.07	0.11
AMEC-W-04	78.6	0.0/0.0	1.02	0.02	0.03
65			**34.03**	**13.86**	**20.79**

* WL-Wetland, D-Ditch, W-Waters of the U.S.

** Mitigation ratios for permanent impacts to USACE jurisdictional areas is 1.5:1

IDNR Jurisdictional Wetland Summary (March 2014)			
Site #	**Mile Post**	**Total Area (Acres)**	**Total Permanent Impact (Acres)**
BV3-WL-I-01	57.1	0.12	0.12
BV3-WL-I-02	59.5	0.29	0.29
BV3-WL-I-03	59.7	0.10	0.01
BV3-WL-I-03A	59.7	0.04	0.00
BV3-WL-I-04	60.3	0.10	0.10
BV3-WL-I-05	60.3	0.17	0.17
BV3-WL-I-06	60.5	0.25	0.25
BV3-WL-I-07	60.1	0.12	0.12
HDR-WL-I-01	60.7	0.44	0.09
HDR-WL-I-02	60.9	0.06	0.03
HDR-WL-I-03	60.9	0.24	0.24
HDR-WL-I-04	61.1	0.07	0.07
HDR-WL-I-05	61.6	0.19	0.00
HDR-WL-I-06	65.7	1.62	0.63
HDR-WL-I-08	62.3	0.02	0.00
HDR-WL-I-09	62.3	0.21	0.00
HDR-WL-I-10	62.5	0.14	0.00
HDR-WL-I-11	62.5	0.34	0.00
HDR-WL-I-12	63.5	0.12	0.12
HDR-WL-I-13	63.5	0.21	0.21
HDR-WL-I-15	64.4	0.34	0.11
HDR-WL-I-16	65	0.10	0.10
HDR-WL-I-17A	65.1	0.36	0.08
HDR-WL-I-17B	65.1	0.44	0.44
HDR-WL-I-18	65.4	0.05	0.00
HDR-WL-I-19	65.5	0.12	0.00
HDR-WL-I-20	65.5	0.12	0.12
HDR-WL-I-21	65.5	0.01	0.01
HDR-WL-I-22	65.5	0.58	0.00
HDR-WL-I-23	65.7	2.08	0.50
HDR-WL-I-24	65.8	0.14	0.00
HDR-WL-I-25	65.9	0.05	0.00

HDR-WL-I-26	65.8	1.39	0.06
HDR-WL-I-27	66	0.99	0.00
HDR-WL-I-28	66.4	0.54	0.45
HDR-WL-I-29	66.5	0.73	0.00
HDR-WL-I-30	66.5	0.14	0.14
HDR-WL-I-31	66.6	0.02	0.00
HDR-WL-I-32	66.6	0.13	0.00
HDR-WL-I-33	66.6	0.01	0.00
HDR-WL-I-34	66.6	0.65	0.00
HDR-WL-I-36	67.2	0.81	0.10
HDR-WL-I-38	67.2	0.05	0.00
HDR-WL-I-39	67.6	1.26	0.89
HDR-WL-I-42	67.7	0.02	0.00
CMT-WL-I-01	72.4	0.04	0.04
CMT-WL-I-02	70.7	0.39	0.39
CMT-WL-I-03	68.2	0.32	0.32
CMT-WL-I-07	68.2	0.34	0.34
CMT-WL-I-08	70.4	0.04	0.04
CMT-WL-I-09	70.4	0.05	0.05
CMT-WL-I-10	70.7	0.001	0.001
CMT-WL-I-11	70.8	0.15	0.15
AMEC-WL-I-01	75.2	0.07	0.00
AMEC-WL-I-02	75.6	0.08	0.00
AMEC-WL-I-03	75.6	0.02	0.00
AMEC-WL-I-04	77.8	0.19	0.19
AMEC-WL-I-05	77.9	0.08	0.08
58		**17.75**	**7.05**

All of the unnamed wetlands along the project site have zero 7Q10 flow and are General Use waters. The waters have not been assessed under the Agency's 305(b)/303(d) program and have not been given an integrity rating or been listed as biologically significant in the 2008 Illinois Department of Natural Resources publication *Integrating Multiple Taxa in a Biological Stream Rating System*. The water bodies are not enhanced in regards to the dissolved oxygen water quality standard.

Segment DTG-02 of Poplar Creek is a General Use water with 0.27 cfs of 7Q10 flow existing at the project location. It is listed in the draft 2012 Illinois Integrated Water Quality Report and

Section 303(d) List as impaired for aquatic life use (potential causes = chloride and total suspended solids (TSS)) and primary contact recreation (potential cause = fecal coliform). Three tributaries of Poplar Creek, identified as Poplar Creek Tributary A, Pond to East Branch Poplar Creek, and East Branch Poplar Creek, would also be impacted by the proposed activities. Given their small size and intermittent flow, these waters have not been assessed by the Agency. The largest tributary to be impacted, East Branch Poplar Creek, has a watershed area of approximately 2.6 square miles at the project location. Biological findings from surveying of this tributary and other stream segments within the Poplar Creek watershed is presented in the Chicago Metropolitan Agency for Planning document *Poplar Creek Watershed Action Plan – July 2007*. Near the project location, much of East Branch Poplar Creek has been channelized and subsequently has poor physical habitat and limited aquatic diversity that is dominated by tolerant organisms. At the proposed project locations, Poplar Creek and the tributaries of Poplar Creek are not enhanced waters in regards to the dissolved oxygen standard, and are not biologically significant and have not been given an integrity rating in the 2008 Illinois Department of Natural Resources publication *Integrating Multiple Taxa in a Biological Stream Rating System*.

Segment GL of Salt Creek is a General Use water with 0.1 cfs of 7Q10 flow of existing at the project location. It is listed in the draft 2012 Illinois Integrated Water Quality Report and Section 303(d) List as impaired for aquatic life use (potential causes = aquatic algae, other flow regime alterations, phosphorus (total), chloride and dissolved oxygen) and fish consumption (potential causes = mercury and polychlorinated biphenyls). A TMDL for the Salt Creek watershed was completed in 2004 and the Applicant, as well as other municipal and governmental transportation entities, was recognized as a potential contributor to the excess chloride in this watershed (http://www.epa.state.il.us/water/tmdl/report/salt-creek/salt-creek.pdf). Two tributaries of Salt Creek, identified as Tributary Origin to Salt Creek and West Branch Salt Creek, would also be impacted by the proposed activities. Given their small size and intermittent flow, these waters have not been assessed by the Agency. At the proposed project locations, Salt Creek and the tributaries of Salt Creek are not enhanced waters in regards to the dissolved oxygen standard, and are not biologically significant and have not been given an integrity rating in the 2008 Illinois Department of Natural Resources publication *Integrating Multiple Taxa in a Biological Stream Rating System*.

The unnamed Higgins Creek Tributary is a General Use water with zero 7Q10 flow. Given its small size and intermittent flow, it has not been assessed by the Agency. The unnamed Higgins Creek Tributary is received by Segment GOA-02 of Higgins Creek, which has been assessed by the Agency. Higgins Creek is listed in the draft 2012 Illinois Integrated Water Quality Report and Section 303(d) List as impaired for aquatic life use (potential causes = chloride and cause unknown) and primary contact recreation (potential cause = fecal coliform). A TMDL for the Des Plaines River/Higgins Creek watershed was completed in 2013 by the Agency (http://www.epa.state.il.us/water/tmdl/report/desplains-higgins-creek/final-tmdl-report.pdf). The Applicant, as well as other municipal and governmental transportation entities, was recognized as a potential contributor to the excess chloride in this watershed due to stormwater discharges. The unnamed Higgins Creek Tributary and Higgins Creek are not listed as biologically significant nor have they received an integrity rating in the 2008 Illinois Department of Natural

Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System*. The streams are not enhanced in regards to the dissolved oxygen water quality standard.

Segment GO-01 of Willow Creek is a General Use water with zero 7Q10 flow. It is listed in the draft 2012 Illinois Integrated Water Quality Report and Section 303(d) List as impaired for aquatic life use (potential causes = alteration in stream-side or littoral vegetation covers (non-pollutant), loss of instream cover (non-pollutant) and phosphorus (total)). Willow Creek is not listed as biologically significant and has not been given an integrity rating in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System*. The stream is not enhanced in regards to the dissolved oxygen water quality standard.

Segment G-15 of the Des Plaines River is a General Use water with 78 cfs of 7Q10 flow. It is listed in the draft 2012 Illinois Integrated Water Quality Report and Section 303(d) List as impaired for aquatic life use (potential causes = chloride, dissolved oxygen, phosphorus (total), and sedimentation/siltation), fish consumption (potential causes = polychlorinated biphenyls and mercury), and primary contact recreation (potential cause = fecal coliform). The Des Plaines River is not listed as biologically significant and has not been given an integrity rating in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System*. It is not enhanced in regards to the dissolved oxygen water quality standard.

Identification of Proposed Pollutant Load Increases or Potential Impacts on Uses.

The pollutant load increases that would occur from this project include some possible increases in suspended solids during construction activities as well as during maintenance and use of the roadway. Fill activities would permanently remove the aquatic life uses of the impacted wetlands and streams.

Fate and Effect of Parameters Proposed for Increased Loading.

The increase in suspended solids would be local and temporary. Erosion control measures would be utilized to minimize any increase in suspended solids (see Table 4 of the Applicant's document *Anti-Degradation Assessment*). Losses of aquatic life use in the permanently filled wetlands and streams would be offset with mitigation. Aquatic life uses in the streams impacted by culvert extensions would be temporarily disturbed during construction, but are anticipated to recover and support a community structure similar to existing conditions.

Purpose and Anticipated Benefits of the Proposed Activity.

The purpose and need of the project is to reconstruct and widen the existing Jane Addams Memorial Tollway (I-90 East Corridor) in order to reduce increasing maintenance and rehabilitation costs and to increase capacity of the Tollway to an acceptable level of service by the addition of a third or fourth through lane in each direction of the proposed corridor. The

purpose of the project is to also provide a safe and efficient travel way for Tollway patrons, and to incorporate future transit capabilities from Chicago to Rockford.

Assessments of Alternatives for Less Increase in Loading or Minimal Environmental Degradation.

The applicant assessed ways to minimize environmental impacts and summarized them in the document entitled *Anti-Degradation Assessment*, dated January 17, 2014. Wetland impacts would be minimized to the greatest extent possible, but complete avoidance is not possible given the fixed alignment of I-90 and its proximity to adjacent wetlands. Similarly, stream impacts would be minimized but are not avoidable, as the majority of stream impacts would be from the extension of pre-existing culverts from I-90 stream crossings. In regards to alternatives, the Applicant's only true alternative to the proposed project is a "no action" alternative given the fixed alignment of I-90. However, the "no action" alternative would result in further traffic congestion, reduced traffic safety, longer travel times as traffic volumes increase, and increased fuel consumption and greenhouse gas emissions due to traffic delays. In addition, higher maintenance and rehabilitation costs would be incurred due to the higher traffic volumes on fewer lanes.

Design strategies were incorporated into the project to aid in minimization of environmental impacts. Wetlands immediately adjacent to the existing right of way (ROW) limits were taken into consideration and methods of design were applied to ensure the avoidance of impact to these areas. Adjacent wetlands next to the existing ROW have been avoided by maintaining the limits of construction inside the existing ROW. This results in the significant avoidance of jurisdictional wetlands that provide water quality, water storage, and wildlife habitat functional values. Vertical retaining walls have been incorporated along the project corridor to eliminate the need for earthen embankment slopes that would otherwise extend further from the edge of the roadway pavement into potential wetland/waters areas. Additional project wetland avoidance is difficult since I-90 already exists and has a fixed alignment. Adequate room does not exist to safely add new inside lanes adjacent to the median. The new proposed outer lanes would be located on the current shoulder and a new shoulder would be added. The existing ditches would be relocated to accommodate the new lanes. Where impacts cannot be avoided, compensatory mitigation would be provided.

<u>Chloride Minimization:</u>

Given that watersheds to be impacted by the proposed activity are recognized as having an existing chloride TMDL or are listed as impaired on the 303(d) List in part due to chloride, the Applicant has proposed that the addition of new roadway does not lead to an increase in deicing activities and chloride loadings into the adjacent waterways. The Salt Creek and Des Plaines River/Higgins Creek TMDL reports recognized that road deicing is necessary for public safety and states that implementation of the chloride TMDL should be based on prudent and practicable road salting BMPs to the extent that the safety of the public is not compromised. As summarized below, the Applicant is committed to using BMPs to the greatest practical extent to achieve no net increased chloride loading as a result of this activity, without sacrificing public safety.

Appendix G of the Applicant's *Anti-Degradation Assessment* document presents two detailed memorandums on the Tollway's watershed approach for chloride minimization and TMDL compliance. Currently there are 196.0 lane miles that receive an average 8,230 tons per year of rock salt for de-icing (42 tons of salt per lane mile). The expansion would add 64.5 lane miles of new pavement, and if no reductions in chlorides are implemented, the Tollway would apply an average of 10,941 tons per year salt. Recognizing that many of the watersheds are impaired for chlorides, the Tollway has committed to not only hold the total application to an average 8,230 tons per year, but to make further reductions to make progress toward lowering the salt concentrations. The Tollway has set an objective of reaching 7,553 tons per year, or 29 tons per lane mile per year of salt use (over a five-year running average) on the expanded Jane Addams Memorial Tollway through the implementation of Best Management Practices (BMPs). This represents a 25% reduction in salt application per lane mile, a reduction agreed upon with the DuPage River/Salt Creek Workgroup, and consistent with the reduction committed to on the Elgin-O'Hare Expressway. The BMPs to be implemented include pre-wetting salt solids, utilizing salt brine for pre-wetting and periodic use of calcium chloride brine, optimization of salt application rates through monitoring of pavement temperatures and weather scenarios, liquid application, and other practices regarding snow plowing. The chloride reduction plan would follow a five year schedule, with the final goal being to achieve an average application rate of 29 tons of salt per lane mile per year. Should the Tollway not be able to reach this goal, it has committed to financially support further BMP efforts in the communities within the specific watersheds. A specific schedule for implementing and measuring progress is included in the chloride memorandum in Appendix G of the Applicant's *Anti-Degradation Assessment* document. The proposed approach is consistent with the Tollway's commitment with the Elgin/O'Hare Expressway; however, smaller reductions are required on the Jane Addams because of the existing expressway, so the Tollway believes it can achieve the offset goals internally. This approach has been presented to the DuPage River/Salt Creek Workgroup, and this group is supportive of the Tollway's approach.

In addition to the chloride minimization plan summarized above, Best Management Practices (BMPs) would be employed throughout the project to aid in containment and treatment of roadway runoff. BMPs proposed for this project include bioswales, infiltration trenches, settling traps, vegetated swales, underdrains, wet swales, and furrows, all of which would minimize not only discharges of chloride, but suspended solids and other pollutants that may be present in roadway runoff. Table 4 of the Applicant's *Anti-Degradation Assessment* document details the specific types of BMPs utilized at each impacted waterway.

To meet the Higgins Creek and Salt Creek TMDLs the proposed approach will be implemented in coordination with the Tollway's Elgin/O'Hare Expressway project. This approach includes the use of Intergovernmental Agreements with the five other communities identified in the Des Plaines River/Higgins Creek TMDL report. The Tollway will coordinate with cooperating entities to implement practices and controls to reduce chloride loadings from the watershed to surface water consistent with the TMDLs.

Summary Comments of the Illinois Department of Natural Resources, Regional Planning Commissions, Zoning Boards or Other Entities

The IDNR EcoCAT system was consulted on January 7, 2013 and it was immediately determined that protected resources may be in the vicinity of the project location. The Department evaluated this information and concluded that adverse effects are unlikely. Consultation was terminated in the January 10, 2013 letter from IDNR.

Agency Conclusion.

This preliminary assessment was conducted pursuant to the Illinois Pollution Control Board regulation for Antidegradation found at 35 Ill. Adm. Code 302.105 (antidegradation standard) and was based on the information available to the Agency at the time the assessment was written. We tentatively find that the proposed activity would result in the attainment of water quality standards; that all existing uses of the impacted waters would be maintained or mitigated; that all technically and economically reasonable measures to avoid or minimize the extent of the proposed increase in pollutant loading have been incorporated into the proposed activity; and that this activity would benefit the community at large by providing safe and efficient travel for Tollway patrons and incorporating future transit capabilities from Chicago to Rockford. Comments received during the 401 Water Quality Certification public notice period will be evaluated before a final decision is made by the Agency.