

EXECUTIVE SUMMARY

This document is the Water Year (WY) 2004 Annual Report of the Chicago District, U. S. Army Corps of Engineers activities in the monitoring and review of the accounting of Lake Michigan diversion flows through Chicago, Illinois as directed by the 1980 amendment to the 1967 U. S. Supreme Court Decree. Additionally, this report serves to summarize the Corps' major accomplishments with respect to the mission as mandated by the Water Resources Development Act of 1986, PL99-662, Section 1142. This act gave the Corps complete responsibility for diversion accounting effective 1 October 1987. This report provides an overview and audit of flow measurements and accounting computed by the Corps of Engineers for WY 2004, 1 October 2003 through 30 September 2004.

The Lake Michigan Diversion Accounting Report for WY 2004 has been completed. The State of Illinois diverted 2,757 cfs during WY 2004. This diversion is 443 cfs less than the 3,200 cfs 40 year average diversion specified in the modified decree. The running average of the diversion for WY 1981 through WY 2004 is 3,214 cfs, or 14 cfs over the annual allocation. Also, the annual average diversion has exceeded the 3,680 cfs annual limit three times, once more than the maximum number of times allowed in the decree. Additionally, the absolute annual maximum of 3,840 cfs has been exceeded during the WY93 accounting period. The cumulative deviation is -333 cfs-years at the end of WY2004. The negative sign indicates a cumulative flow deficit. The maximum allowable cumulative flow deficit specified in the decree is -2,000 cfs-years.

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INTRODUCTION

The diversion of water from the Lake Michigan watershed is important to the Great Lake states and to the Canadian province of Ontario. The states and province that border the Great Lakes have concerns with diversions during periods of low lake levels and the long-term effects of diversion. To insure these concerns are considered, the U.S. Army Corps of Engineers is responsible for the accounting of flow diverted from the Lake Michigan watershed.

The Water Year (WY) 2004 Annual Report on Lake Michigan Diversion Accounting presents activities by the Corps of Engineers in accounting for the diversion from Lake Michigan by the State of Illinois. The accounting of the diversion is performed according to the guidelines established in the 1980 modified U.S. Supreme Court Decree concerning the diversion.

Presented in this report is the history of the diversion and its accounting, the certification of diversion flows for WY 2004, a description of the sources of the diversion, a description of the accounting procedures, and a summary of all significant activities that occurred during WY 2004 through to the present.

AUTHORITY FOR REPORT

Under the provisions of the U.S. Supreme Court Decree in the Wisconsin, et al v. Illinois et al, 388 U.S. 426, 87 S.Ct. 1774 (1967) as modified by 449 U.S. 48, 101 S. CT. 557 (1980), the Corps of Engineers monitors the measurement and computation of Lake Michigan diversion by the State of Illinois. The terms of the modified decree require the Corps of Engineers to prepare an annual report on the accounting of the Lake Michigan water diverted by the State of Illinois and actions taken by the involved agencies.

HISTORY OF THE DIVERSION

Water has been diverted from Lake Michigan at Chicago into the Mississippi River Watershed since the completion of the Illinois and Michigan (I & M) Canal in 1848. At that time, the diversion averaged about 500 cubic feet per second (cfs). The I & M Canal was built primarily to serve transportation needs by providing a connecting watercourse between the Great Lakes and the Mississippi River system.

With the development of the Chicago metropolitan area, sewer and drainage improvements led to severe sanitation problems in the mid to late 1800's. The newly constructed sewers moved water and wastes into the Chicago River, which until 1900 drained to Lake Michigan. The water quality of Lake Michigan deteriorated and contaminated the city's primary water supply.

A second problem that occurred during this time period was an increase in the overbank flooding within the city. As more roads were built and buildings constructed, the sewer system was correspondingly expanded. The increase in impervious area from the newly constructed roads and buildings increased the rate and volume of stormwater runoff and resulted in increased flooding.

As a solution to the sanitation and flooding problems, construction of the Chicago Sanitary and Ship Canal (CSSC) was undertaken. Construction of the CSSC allowed the flow direction of the Chicago River to be reversed (Figure 1). Construction of the Chicago Sanitary and Ship Canal was completed in 1900 by the MWRDGC. The CSSC followed the course of the older I & M Canal. The CSSC is much larger than the I & M canal and can handle the Chicago River flow, as well as increased shipping. In 1938, the Chicago River Controlling Works (CRCW) was constructed at the mouth of the Chicago River. The CRCW regulates the amount of Lake Michigan water allowed to pass into the river and restricts river flooding from entering Lake Michigan. The Lockport Lock and Dam controls the water level in the CSSC.

Between 1907 and 1910, the MWRDGC constructed a second canal called the North Shore Channel. It extended from Lake Michigan at Wilmette in a southerly direction 6.14 miles to the north branch of the Chicago River. The Wilmette Pumping Station, also known as the Wilmette Controlling Works, regulates the amount of Lake Michigan flow allowed down the channel through the use of one vertical lift gate, one 250 cfs pump (refurbished in 2002), and five 10 cfs pumps (installed in 2000). The MWRDGC prefers to use the gate to take discretionary flow from Lake Michigan, but when the difference in level between Lake Michigan and the North Shore Channel is small the pumps are used.

Construction of a third canal, the Calumet Sag Channel, was completed in 1922. The canal connects Lake Michigan through the Grand Calumet River, to the CSSC. The Calumet Sag Channel was constructed to carry sewage from South Chicago, Illinois and East Chicago, Indiana. The Blue Island Lock and Dam controlled flow through the canal. The O'Brien Lock and Dam, which replaced the Blue Island Lock and Dam, was completed in 1967 and is located on the Calumet River. The O'Brien Lock and Dam regulates the flow of Lake Michigan waters down the Calumet Sag Channel. Figure 2 shows the affected watershed.

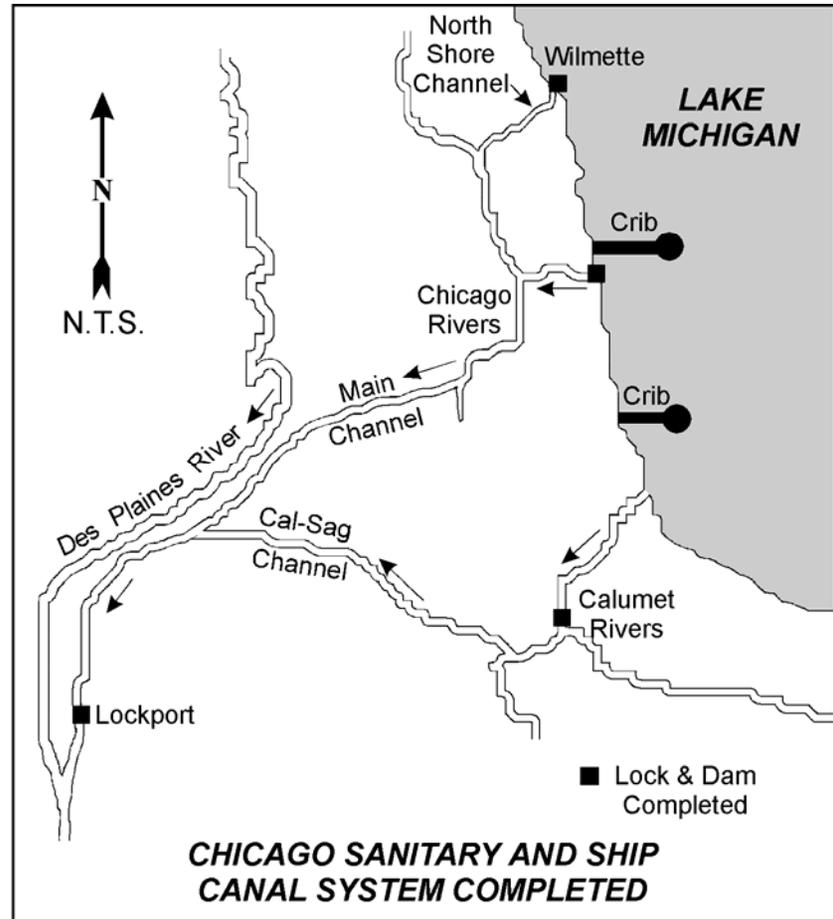
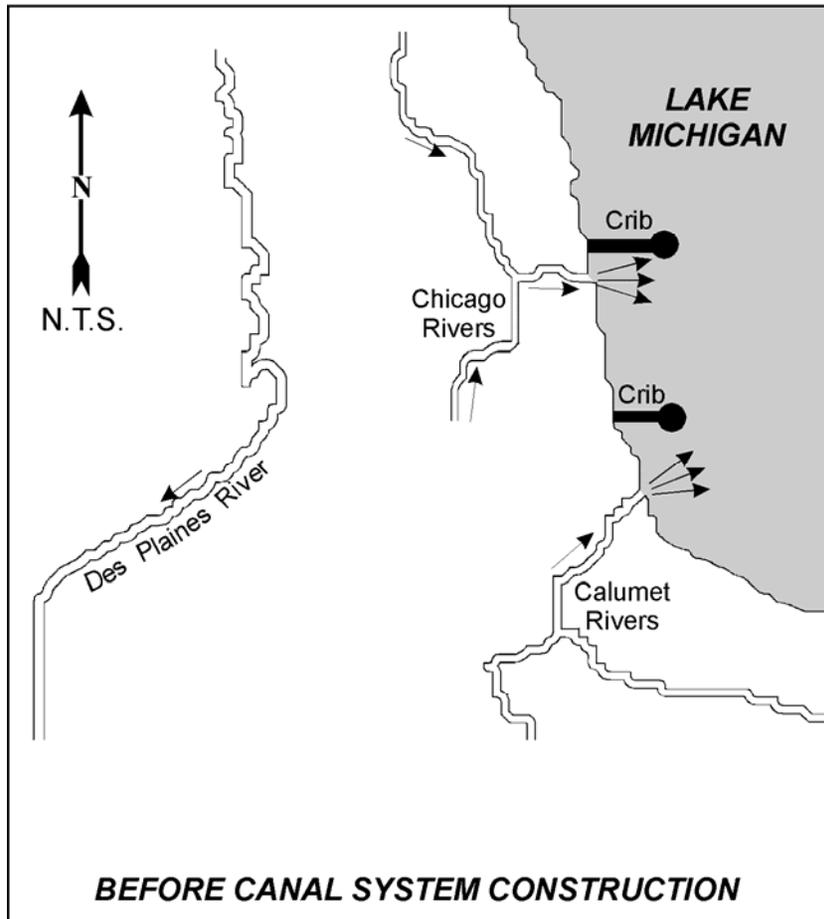


FIGURE 1 DEVELOPMENT OF THE CHICAGO SANITARY AND SHIP CANAL SYSTEM

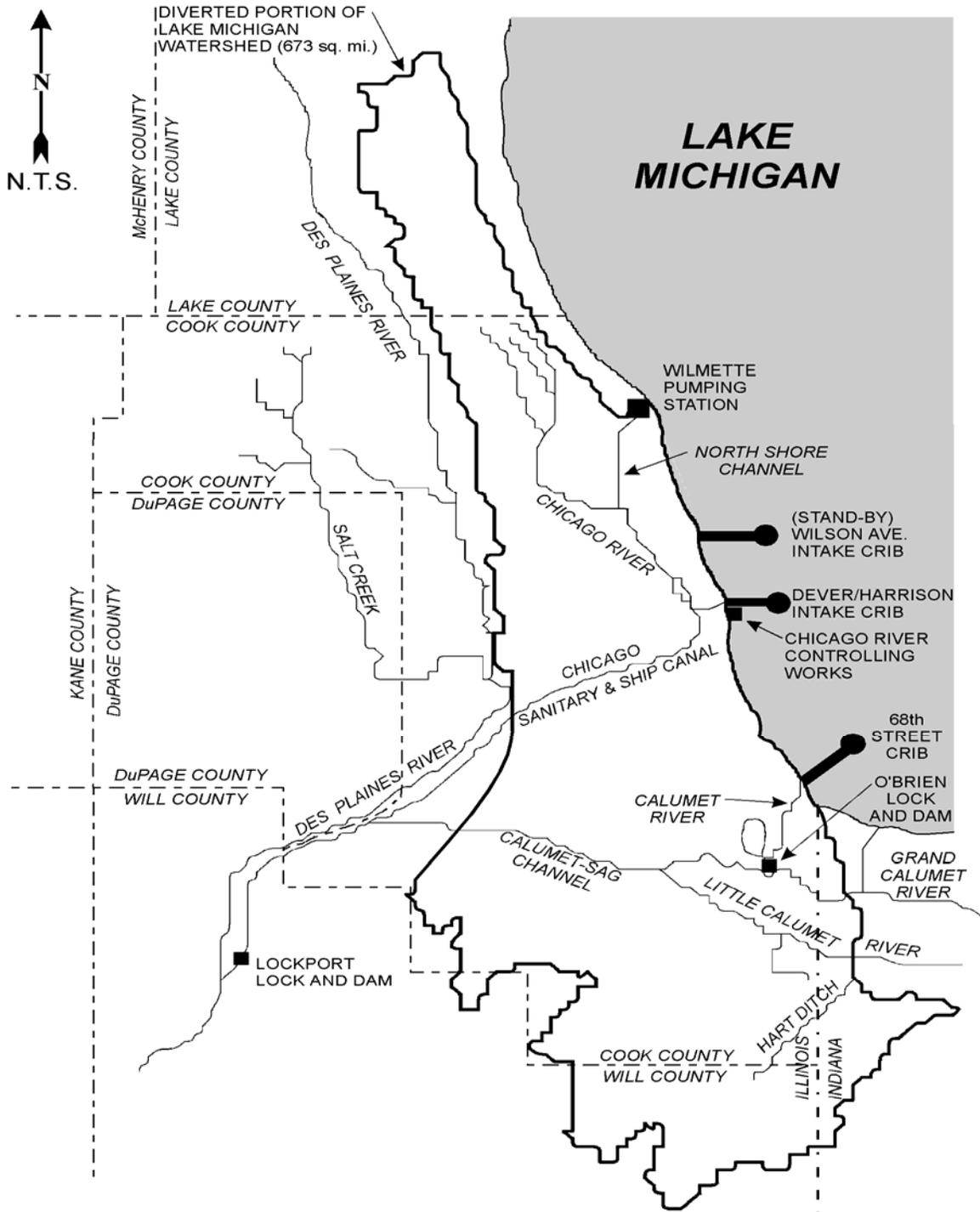


FIGURE 2 LOCATION PLAN - LAKE MICHIGAN DIVERSION AT CHICAGO

SIGNIFICANT HYDROLOGIC EVENTS

During WY 2004, an average total of 35.24 inches of precipitation fell at the 25 Illinois State Water Survey (ISWS) raingages that make up the Lake Michigan Diversion Accounting raingage network (Westcott, 2005). The average total precipitation for WY 2004 is 97% of the 14-year (1990-2003) average of 36.21 inches for the 25 raingage network and was about 97% of the 1971-2000 Chicago O'Hare Airport annual precipitation average of 36.27 inches. Table 1 tabulates the recorded monthly rainfall data during WY 2004, and the deviation from the ISWS 14-year annual and monthly average precipitation.

TABLE 1 WY 2004 MONTHLY AND ANNUAL PRECIPITATION (INCHES)
Illinois State Water Survey Average Across the 25 Raingage Network

<u>Month</u>	<u>Precipitation</u>	<u>Precipitation</u>	<u>Deviation</u>	<u>Average</u>
Oct-03	1.81	3.23	-1.42	56%
Nov-03	5.76	2.81	2.95	205%
Dec-03	1.66	1.70	-0.04	98%
Jan-04	0.87	2.05	-1.18	42%
Feb-04	0.56	1.75	-1.19	32%
Mar-04	3.74	2.25	1.49	166%
Apr-04	1.55	3.66	-2.11	42%
May-04	6.40	4.05	2.35	158%
Jun-04	3.50	3.94	-0.44	89%
Jul-04	3.27	3.61	-0.34	91%
Aug-04	5.25	4.18	1.07	126%
Sep-04	0.87	2.97	-2.10	29%
Annual	35.24	36.20	-0.96	97%

There were 116 precipitation events, including nine heavy precipitation events, in Water Year 2004. Seven heavy precipitation events occurred during the warm months, May through August. Six events included one or more gages exceeding at least the two-year recurrence interval. Three events included gages that exceeded at least the five-year recurrence interval, and two events included gages that exceeded the ten-year recurrence interval. These later events occurred in November 2003 and August 2004.

No backflow event occurred at the lakefront in WY 2004.

STATUS OF ACCOUNTING REPORTS

Lake Michigan diversion flow data is summarized in accounting reports prepared on an annual basis as flows are certified. Since implementation of the modified

Supreme Court Decree of 1 December 1980 and before this report, the Corps of Engineers has certified diversion flows for WY 1981 through WY 2003. The WY 2004 Lake Michigan Diversion Accounting Report is certified and included as appendix A of this Water Year 2004 Annual Report. The State of Illinois diverted 2,757 cfs during WY 2004. This diversion is 443 cfs less than the 3,200 cfs 40 year average diversion specified in the 1980 modified decree. Table 2 shows the accounting year, the certified flows, the running average flows, and the cumulative deviation from the allowable diversion of 3,200 cfs.

The running average diversion for the period WY 1981 through WY 2004 is 3,214 cfs, 14 cfs greater than the 3,200 cfs 40 year average diversion specified by the modified decree. Also, the annual average diversion has exceeded the 3,680 cfs annual limit three times, once more than the maximum number of times allowed in the decree. Additionally, the absolute annual maximum of 3,840 cfs has been exceeded during the WY93 accounting period. The cumulative deviation, the sum of the differences between the annual average flows and 3,200 cfs, is -333 cfs-years at the end of WY 2004. The negative cumulative deviation indicates a cumulative flow deficit. The decree specifies a maximum allowable deficit of -2,000 cfs-years over the first 39 years of the 40-year averaging period.

Data collection and compilation for the WY 2004 accounting report were done by the Corps. Hydrologic and hydraulic modeling and diversion accounting for Water Year 2004 were also performed by the Corps. Data collection and compilation for this report began in Fiscal Year (FY) 2004.

TABLE 2 STATUS OF THE STATE OF ILLINOIS DIVERSION
Under the 1980 Modified U.S. Supreme Court Decree

Accounting Year	Certified Flow (cfs)	Running Average (cfs)	Cumulative Deviation (cfs-yrs)
1981	3,106	3,106	94
1982	3,087	3,097	207
1983	3,613	3,269	-206
1984	3,432	3,310	-438
1985	3,472	3,342	-710
1986	3,751	3,410	-1,261
1987	3,774	3,462	-1,835
1988	3,376	3,451	-2,011
1989	3,378	3,443	-2,189
1990	3,531	3,452	-2,520
1991	3,555	3,461	-2,875
1992	3,409	3,457	-3,084
1993	3,841	3,487	-3,725
1994	3,064	3,456	-3,589
1995	3,197	3,439	-3,586
1996	3,108	3,418	-3,494
1997	3,114	3,400	-3,408
1998	3,060	3,382	-3,268
1999	2,909	3,357	-2,977
2000	2,584	3,318	-2,361
2001	2,698	3,289	-1,859
2002	2,919	3,272	-1,578
2003	2,398	3,234	-776
2004	2,757	3,214	-333

SOURCES OF DIVERSION

The Lake Michigan diversion consists of three primary components. These components are domestic pumpage from Lake Michigan used for water supply and not returned to Lake Michigan, stormwater runoff from the diverted Lake Michigan watershed, and direct diversions through the three lakefront control structures.

Domestic pumpage from Lake Michigan is used for water supply and its effluent is discharged to the canals by various Water Reclamation Plants (WRP's). Currently, the WRP's that divert domestic pumpage from the lake either discharge to the canal system or to the Des Plaines River and its tributaries. In the future as more communities convert to Lake Michigan water supply, water supply effluent may also be discharged to the Fox River. The Fox River is approximately 35 miles west of downtown Chicago.

Stormwater runoff that previously drained to Lake Michigan through the Chicago River and the Calumet River now drains to the Chicago Sanitary and Ship Canal (CSSC) and the Calumet Sag Channel, respectively. The Calumet Sag Channel drains to the CSSC, and the CSSC ultimately drains into the Illinois River and the Mississippi River. The drainage area of the diverted Lake Michigan watershed is approximately 673 square miles.

Direct diversions occur at three lakefront locations — the CRCW, the O'Brien Lock and Dam, and the Wilmette Pumping Station. These controlling structures are located downtown, at the south end, and at the north end of the Chicago area, respectively. The direct diversion at CRCW and O'Brien Lock and Dam consists of four components: lockage, leakage, discretionary flow, and navigation makeup flow, whereas only leakage and discretionary flow occur at Wilmette. The lockage component is the flow used in locking vessels to and from the lake. The leakage component is water estimated to pass, in an uncontrolled way, through or around the three lakefront structures. The purpose of the discretionary diversion is to dilute effluent from sewage discharges and improve water quality in the canal system. Navigation makeup water is composed of two parts. When large storms are forecast, the canal is drawn down before the storm to prevent flooding, and navigation makeup water is used during this draw down period to maintain navigation depths. If the runoff is not enough to refill the canal, additional navigation makeup water is allowed to pass from Lake Michigan to return the canal system to its normal operating stages.

ACCOUNTING PROCEDURES

Diversion accounting uses both measured and estimated flows. A series of hydrologic and hydraulic computer models use various meteorological data to simulate flows not measured. These simulated flows as well as measured flows are used to compute the diversion. Along with the diversion calculation, a number of water budgets verify simulated flows and estimate the reliability of the computed diversion.

DIVERSION COMPUTATION

An acoustic velocity meter (AVM) was installed and has been operating at Romeoville (five miles upstream of the Lockport Powerhouse and three miles upstream of the Lockport Controlling Works) since June 12, 1984. The AVM directly measures total flow through the canal above both the Powerhouse and the Controlling Works. The overwhelming majority of the Lake Michigan diversion and some non-Lake Michigan flows pass through the AVM. The diversion accounting procedure uses the flow measured at Romeoville and deducts flows not accountable in the diversion. Diversion flows which bypass Lockport are added to yield the net computed diversion of water from Lake Michigan. This procedure represents the accounting technique as required by the modified Supreme Court Decree.

The flow measured at Romeoville was approximately 100% of the annual diversion during WY 2004. Approximately 90.3% of the diverted water was measured by the AVM during WY 2004.

Deductions from the Romeoville AVM flow include runoff from 217 square miles of the Des Plaines River watershed discharged to the canal, groundwater supply effluent and groundwater seepage into the Tunnel and Reservoir Plan (TARP) tunnels discharged to the canal, and Indiana water supply discharged to the canal through the Calumet River system and the Calumet Sag Channel (see figure 2 for locations). The computer models of the Des Plaines watershed area estimate the runoff deduction. The groundwater pumpage deductions are obtained directly from pumping records. The Indiana water supply is computed from pumping records and a calculation to determine the portion of the water supply draining west to the Calumet Sag Channel.

The additions for diversion flow that do not flow through Romeoville are primarily Lake Michigan water supply pumpage effluent treated and released to the Des Plaines River or its tributaries. This flow is obtained directly through pumping records of the communities involved and accounts for approximately 9.3% of the diversion in WY 2004. As more communities convert to Lake Michigan water supply, the percentage will increase.

DIVERSION BUDGET CHECKS

Water budgets verify those flows that are not measured. Most of the budgets compare simulated flows to recorded flows and these comparisons indicate the accuracy of the diversion accounting. The four primary budgets are the budgets for the three major Water Reclamation Plants (WRP's) that serve the area involved in diversion accounting and the canal balance budget for the CSSC. The Upper Des Plaines pump station budget will also become a significant budget after measurement problems are resolved. The remaining budgets estimate runoff from stream gaged areas in the Lake Michigan watershed or are budgets of non-simulated flows such as water supply pumpage. The budgets are discussed in detail in the WY 2004 accounting report.

ACTIVITIES FOR FY 2004

The activities in FY 2004 included data collection for WY 2004 and data analysis for WY 2002 and WY 2003. Coordination of activities related to the Fifth Technical Committee continued, and the Romeoville diversion accounting reports for WY 2000 and WY 2001 were published (USACE, 2004). Funding for Lakefront accounting was not included in the Energy and Water Appropriations Bill for FY 2004; therefore, the activities of Lakefront accounting were discontinued. The stream gages deployed at the lakefront controlling works remained in service, however, with a significantly reduced support from the USGS. The AVM gage on the CSSC at Romeoville was planned to be moved to a new location due to the upcoming construction of the second dispersal barrier at the site. The electrical field generated by the barrier would interfere with the compass that is used for ADCP discharge measurements, and it could also potentially affect the AVM acoustic signals. The USACE, the USGS, and the 5th Technical Committee evaluated four new site candidates by taking into account the following factors: diversion flow capture, canal hydraulics, and the barge fleeting/traffic on the CSSC, and reached a consensus that Lemont (RM 302) was the best site. Lemont is about 6 miles upstream from the Romeoville site and 1.5 miles downstream from the Cal-Sag Junction. In FY 2004, the 5th Technical Committee completed the review of flow measurement and accounting procedures and published the report on their findings and recommendations (Espey et al., 2004).

ACTIVITIES FOR FY 2005 – FY 2008

The activities in FY 2005 included data collection for WY 2005 and continued data analysis for WY 2002 and WY 2003. The Corps started hydrologic simulations for WY 2002 and WY2003 Romeoville accounting. In the mean time, the Corps evaluated the recommendations made by the 5th Technical Committee, and looked for opportunities for implementing some changes. The Corps established a new Contract with the ISWS to acquire continued services for the operation and maintenance of the 25-gage raingage network in the diverted watershed.

The activities in FY 2006 included data collection for WY 2006 and data analysis for WY 2004 and WY 2005. Responding to a major recommendation made by the 5th Technical Committee, the Corps funded the USGS to perform a hydrological study of Midlothian and Tinley Creek Watersheds based on the parameter sets used in diversion accounting modeling before and after WY 2000. The AVM on the CSSC at Romeoville was removed in May, 2006 when the construction of dispersal barrier reached a stage that remaining equipment and cables at the site had to go. Before the Romeoville gage was completely decommissioned, some concurrent data at Romeoville and Lemont had been collected. These data could help calibration and independent verification of AVM data at Lemont. In 2006, a dialogue was initiated between the Corps and the MWRDGC regarding upgrade of the flow measurement capability at the Upper Des Plaines Pumping Station. As part of the MWRDGC's pumping station rehabilitation plan, the MWRDGC would replace the aging pumps and associated flow meters in the pumping station. In addition, a new TARP connecting structure would be constructed near the station to divert combined sewer flows from the intercepting sewer to the TARP during large runoff events or repairs of the pumping station. To ensure uninterrupted data and provide independent verification of flow rates through the pumps, the Corps requested that a separate flow meter in the intercepting sewer be considered. The MWRDGC cooperatively agreed to install an additional flow meter in the incoming intercepting

sewer upstream of both the pumping station and the new TARP diversion structure. In 2006, the Corps published the Lakefront accounting report for WY 1997 through WY 2003 (USACE, 2006a), the Romeoville accounting report for WY 2002 (USACE, 2006b), and the Romeoville accounting report for WY 2003 (USACE, 2006c).

The activities in FY 2007 included data collection for WY 2007 and modeling of diversion accounting for WY 2004 and WY 2005. AVM flow data collection at Lemont went smoothly; no data were lost due to gage malfunction. In 2007, two real time stage gages at the Chicago Lock were installed to monitor water levels and water temperature in the Chicago River and Lake Michigan. These stage gages provide accurate data for controlling works operation and direct diversion computations. A multi-sensor weather station was also installed at the Chicago Lock; it reports air temperature, relative humidity, atmospheric pressure, wind speed, wind direction, and precipitation every hour. The ISWS noticed that the raingage at Chicago Heights in the precipitation measurement network consistently registered low. After testing the suspected raingage with a trusted gage, the ISWS replaced the equipment and revised the hourly precipitation records at Chicago Heights for WY 2005 and WY 2006. In August 2007, search for material experts to serve on the 6th Technical Committee for reviewing the flow measurements and accounting procedures for Lake Michigan Diversion Accounting began.

The activities in FY 2008 included raingage and flow data collection for WY 2008, data analysis for WY 2006 and WY 2007, and completion of Romeoville accounting computations for WY 2004 and WY 2005. The contracts for the 6th Technical Committee members were established in November 2007. Having invited the parties of interest from various Great Lake states and the Province of Ontario, the Corps hosted the first workshop of the 6th Technical Committee in January 2008. The USGS conducted the second workshop that included a two-day meeting at Urbana, one half day meeting in Chicago, and a discharge measurement demonstration at Lemont in April 2008. The MWRDGC's project on rehabilitation of the Upper Des Plaines Pumping Station was started in 2008. The velocity profiler (meter) will be installed in the intercepting sewer by the end of 2008, and the project is scheduled to be completed in April 2009. The long time issue regarding verification of the simulated runoff from the Des Plaines watershed that discharges to the CSSC, a deductible component to the flow measured at Romeoville, will be resolved using data collected by this flow meter.

ACCOUNTING REPORTS

The Lakefront accounting report for WY 1997 through 2003 (contained in the WY 2001 annual report) was completed and distributed in FY 2006 (USACE, 2006a). The Romeoville accounting reports for WY 2002 and WY 2003 (contained in the WY 2002 and WY 2003 annual reports, respectively) were also completed and distributed in FY 2006 (USACE, 2006b and 2006c). The Romeoville accounting report for WY 2004 is included in this WY 2004 annual report.

SUMMARY AND CONCLUSIONS

SUMMARY

The Lake Michigan Diversion Accounting procedure continues to evolve and improve. Further improvements to the Romeoville Accounting are being implemented.

CONCLUSIONS

The Lake Michigan Diversion Accounting Report for WY 2004 has been completed as required by the Supreme Court Decree. The State of Illinois diverted 2,757 cfs during WY 2004. This flow is 443 cfs less than the 3,200 cfs limit specified in the decree. The running average of the diversion for WY 1981 through WY 2004 is 3,214 cfs, or 14 cfs over the annual allocation. Also, the annual average diversion has exceeded the 3,680 cfs annual limit three times, once more than the maximum number of times allowed in the decree. Additionally, the absolute annual maximum of 3,840 cfs has been exceeded during the WY93 accounting period. The cumulative deviation is -333 cfs-years at the end of WY 2004. The negative sign indicates a cumulative flow deficit. The maximum allowable cumulative flow deficit specified in the decree is -2,000 cfs-years.

References

1. Espey, William H., Charles S. Melching, and Dean M. Maden. 2004. *Lake Michigan Diversion Findings of the Fifth Technical Committee for Review of Diversion Flow Measurements and Accounting Procedures*. Prepared for the U.S. Army Corps of Engineers, Chicago.
2. U.S. Army Corps of Engineers. (USACE) 2004. *Lake Michigan Diversion Accounting Water Year 2000 Annual Report. Contains Lake Michigan Diversion Accounting Water Year 2000 Report and Water Year 2001 Report*.
3. U.S. Army Corps of Engineers. (USACE) 2006a. *Lake Michigan Diversion Accounting Water Year 2001 Annual Report. Contains Lakefront Accounting Technical Analysis*.
4. U.S. Army Corps of Engineers. (USACE) 2006b. *Lake Michigan Diversion Accounting Water Year 2002 Annual Report. Contains Lake Michigan Diversion Accounting Water Year 2002 Report*.
5. U.S. Army Corps of Engineers. (USACE) 2006c. *Lake Michigan Diversion Accounting Water Year 2003 Annual Report. Contains Lake Michigan Diversion Accounting Water Year 2003 Report*.
6. Westcott, Nancy E. 2005. *Continued Operation of a Raingage Network for Collection, Reduction, and Analysis of Precipitation Data for Lake Michigan Diversion Accounting: Water Year 2004*. Illinois State Water Survey Contract Report 2005-01.
7. Wisconsin et. al., v. Illinois et. al., Michigan v. Illinois et. al. New York v. Illinois et. al. U.S. 2, 3, and 4, Original 1 - 18, 1980.

APPENDIX A
LAKE MICHIGAN DIVERSION ACCOUNTING
WATER YEAR 2004 REPORT