

May 7, 2007

Theodore Bosch  
Wisconsin Department of Natural Resources  
2300 N. Martin Luther King Dr.  
Milwaukee, WI 53212

**RE: Comments on Proposed Restoration Project for Blatz Pavilion Bay along the Milwaukee River in Lincoln Park**

Dear Ted,

I am writing these comments on behalf of Friends of Milwaukee's Rivers (FMR) regarding the proposed restoration project for the Blatz Pavilion Bay on the Milwaukee River in Lincoln Park. These comments address the remedial investigation/feasibility study that has been completed for the Blatz Remediation project by Natural Resource Technology, which evaluates 4 project alternatives to remove approximately 3,900 cubic yards of contaminated sediment from the Milwaukee River and provides details on how the preferred alternative would be implemented.

Friends of Milwaukee's Rivers (FMR) is a non-profit organization, representing roughly 1,500 members and volunteers in the greater Milwaukee area. Our mission is to protect water quality and wildlife habitat and advocate sound land use in the Milwaukee, Menomonee, and Kinnickinnic River Watersheds. Our constituents are also very concerned with both maintaining and improving public access to our rivers for recreation and conserving the beauty and health of our rivers, which enhance our quality of life. We support this remediation project that will remove contaminated sediment contaminated with PCBs and PAHs near the Blatz Pavilion. This project will reduce potential risks that this contamination poses to human health and the environment. FMR also supports the DNR's efforts to obtain State Bonding funds and Legacy Act funds to clean up all contaminated areas upstream of the Estabrook Impoundment including Lincoln Creek.

FMR's constituents are exposed to these toxins through river clean-ups, paddling activities, fishing, water quality monitoring, and simply by living adjacent to this portion of the Milwaukee River. FMR has held river clean-ups in this location for close to a decade, as it is an area that tends to accumulate trash. Although we always warn our volunteers of the health risks and make them wear gloves, potential human exposure to PCBs is a continuing concern for our volunteers. There are several areas within Lincoln and Estabrook Parks that are part of the Milwaukee Urban Water Trail, and are popular river access points. Urban Ecology Center in Milwaukee regularly teaches children and adults how to learn to kayak and canoe in Lincoln Park, because low flow conditions make this an ideal site for paddling. Exposure of contaminated sediments to paddlers is a real concern in both Lincoln and Estabrook Parks. In addition, Blatz Pavilion itself affords easy access

to the Milwaukee River, and is a popular location for children as well as fishermen to access the river, which increases possibility of exposure by the public to these contaminated river sediments. FMR constituents also include adjacent local homeowners along the Milwaukee River, as well as citizen water quality monitors that work regularly in these rivers. We also know of at least 2 families who continue to water ski in this area despite water quality, erosion, and safety concerns.

Due to the high risk that these contaminated sediments pose to the public, we support the preferred alternative to remove and landfill these pollutants as opposed to capping and in-situ treatment. We also support removing as much PCBs to the greatest extent possible—to at least less than 1 mg/kg of contamination if not smaller concentrations. Although we understand that clean backfill material will be added to reduce the possibilities of sediment from upstream re-depositing in this excavated area, we would be supportive of providing increased water levels at this location to accommodate non-motorized watercraft such as canoes and kayaks in the future. The Blatz Pavilion was historically used as a boat house, and it would be great to restore the “bay” to Blatz Pavilion Bay and allow for some quality recreational use. We would hope that some sort of low-flow channel could be created to accommodate non-motorized boating at this location when Estabrook Dam is open or closed. Furthermore, maybe the ramp that is being built to accommodate sediment removal activities by contractors could be incorporated into a cost-effective non-motorized boat launch? Another access option would be to create a new launch as part of the old Hampton Road bridge pilings on the west bank of the river, which would reach into the main channel of the Milwaukee River where water levels tend to be higher. This launch could also be constructed in a way to discourage sediment re-deposition into the Bay potentially, and would provide an easy connection to the Oak Leaf Trail and Hampton Avenue.

Increased water levels at Blatz Pavilion would also benefit fishermen and better accommodate educational activities such as water quality monitoring, environmental education, etc. FMR also recommends looking at the possibility of incorporating some sort of fish habitat into Blatz Pavilion Bay similar to what was constructed downstream of North Avenue Dam. It would seem that such habitat would minimize sediment re-deposition and also provide an additional benefit to local fisheries and improve fishing opportunities for local citizens at the Blatz Pavilion. It may also be cheaper than backfilling with sand.

We understand that shoring activities along the eastern boundary of the embayment would likely be necessary to facilitate removal and dewatering of sediments near the waters edge in November (when the dam is open). We also understand that silt fence is being proposed along this eastern boundary to minimize sedimentation into the river. Sediment fence is an oxymoron, as it generally allows sediment to pass right through it, and is not effective as a stand-alone best management practice, especially in or adjacent to flowing rivers. FMR strongly encourages the DNR to mandate stronger erosion controls to protect the Milwaukee River for this project, keeping in mind what has worked and not worked at locations undergoing similar large-scale earth moving projects such as MMSD’s Hart Park and County Grounds flood management projects.

FMR supports using Hampton Avenue as a trucking route for this project, as it will minimize destruction of natural areas and trees in Lincoln Park that would be destroyed by a southern

access point. Appropriate safety precautions should be taken to protect the safety of park users, especially where Hampton Avenue and the Milwaukee River Parkway come together. Furthermore, it seems likely that Hampton Avenue will be used as a trucking route by MMSD regardless, to transport deep tunnel fill from their new tunnel extension at 32<sup>nd</sup> and Hampton. This fill could be used at the Blatz site as well if it is deemed clean. We'd also suggest that the contractors be required to revegetate disturbed areas with native prairie plants instead of lawn after the project is complete. These plants would provide greater protection of water quality, reduce stormwater runoff, provide educational opportunities for kids using the Pavilion, and be less maintenance for Milwaukee County Parks staff (e.g. less lawn to mow). FMR would be willing to help coordinate citizen volunteers to help with that effort.

In closing, FMR supports the remediation of contaminated sediments at the Blatz Pavillion Bay on the Milwaukee River in Lincoln Park. We hope that the remediation of this area takes into account future recreational opportunities and protects water quality of the Milwaukee River to the greatest extent possible. We hope that this remediation project kicks-off a badly needed rejuvenation of Blatz Pavilion Bay and Lincoln Park, and restores this area as a recreational jewel in the Milwaukee County Park system.

Thank you for your consideration of these comments.

Sincerely,

Cheryl Nenn  
Milwaukee Riverkeeper

Cc: Lynn Broaddus, FMR  
Sharon Gayan, WDNR  
John Melby, WDNR  
Sue Black, Milwaukee County Parks  
Kevin Haley, Milwaukee County Parks  
Dan Gray, UEC