

----- Forwarded message -----

From: e.a.woolsey [REDACTED]@mailbag.com>

Date: Sun, Oct 28, 2018, 2:42 PM

Subject: 53472 Adopting the Milwaukee Street Special Area Plan as a Supplement to the City of Madison Comprehensive Plan

To: [REDACTED]@1kfriends.org>, <district15@cityofmadison.com>, [REDACTED]@gmail.com>, <district2@cityofmadison.com>, [REDACTED]@madisoncollege.edu>, <district18@cityofmadison.com>, <district2@cityofmiddleton.us>, [REDACTED]@gmail.com>

Dear Board Members,

Unfortunately, I cannot attend the Transportation Policy and Planning meeting this Monday. I would like to comment on the Milwaukee Street Special Area Plan as a Supplement to the City of Madison Comprehensive Plan. In the revised Draft and Future Land Use Plan (Relocated Commercial Alternative for Woodman's) on pages 16 and 17, there is a design for community mixed use buildings along Milwaukee Street with a road running from from Milwaukee Street behind these buildings to Dempsey Road. Also behind these buildings on the other side of this road is a proposal for a Residential Mix 2 (medium) development. Behind this is s proposal for another road that separates this development from Eastmorland Park. The Residential Mix 2 development is out of character with the rest of the single story buildings that comprise the rest of the adjoining neighborhood and the addition of a second road next to the park is an unnecessary addition. The road is more impermeable surface which must be crossed by children to enjoy the park. After the floods and hight water this summer, the last thing we need is less surface for water percolation. I would suggest a planting of trees where this second road is proposed. This would act to absorb runoff as well as buffering the neighborhood and park from esthetically dissimilar architect on both Milwaukee Street and the proposed Mix 2 residents. Cars can access this Mix 2 development from the additional road directly behind the community mix development on Milwaukee Street. While I understand Woodman's does not plan on moving, I don't want this development as proposed on pages 16 and 17 of plan to be in place.

I appreciate all your time and effort you put in trying to make this city the best it can be. Thank you for your consideration.

Ed Woolsey

[REDACTED] Dawes Street

Madison, WI 53714

----- Forwarded message -----

From: **Jeanine Schneider** <[REDACTED]@gmail.com>

Date: Thu, Oct 25, 2018, 3:21 PM

Subject: Fwd: [Milwaukee St Plan] Upcoming meetings

To: <[REDACTED]@1kfriends.org>, <district15@cityofmadison.com>, <[REDACTED]@gmail.com>, <district2@cityofmadison.com>, <[REDACTED]@madisoncollege.edu>, <district18@cityofmadison.com>, <district2@cityofmiddleton.us>, <[REDACTED]@gmail.com>

Greetings,

I'm writing to all of you as members of the Transportation Policy and Planning Board as I have a class on Monday at Madison College at the same time as your upcoming meeting. I'm really hoping maybe you'll actually listen to me and have the power to do something.

I have many concerns about this proposed plan, but the largest one is the plan area does not go far enough east. I live just off Walbridge Ave, and the 4000 block of Milwaukee St is incredibly dangerous. I was given the distinct impression from Dan McAuliffe at the meeting at the Blooming Grove Town Hall this summer that it was too much of a hassle to deal with the State of Wisconsin because the plan area would then include part of Highway 51, and thus was too much of a burden to deal with this incredibly busy block. Furthermore, I placed an open records request with his office on October 8th to see if his office had even been in contact with the State of Wisconsin regarding expanding the plan area, and I'm still waiting for a response beyond an auto-reply email.

I've been contacting the City for years over how busy this block is. Two years ago I filmed these videos of me trying to cross Milwaukee St after getting off the bus; it's only gotten worse since PDQ became Kwik Trip - <https://youtu.be/Jk9W7cnn9ak> & <https://youtu.be/ScPhXw0kLHE> - if you notice in one of the videos it takes me a minute and a half to cross the street IN a marked cross walk, and in the other video one car stops and another driver could have hit me. It's like this a good portion of the day out there, and this doesn't even show the traffic in and out of McDonald's and KwikTrip, the semis that cut across three lanes of traffic from the Stoughton Rd frontage road to get to the on ramp of Highway 51, the heavy traffic onto N Walbridge from employees at American Family or the people who do U-turns to get into Meinke.

I really don't know what to do any more to get this addressed, and I always get told it's someone else's problem. The property where the businesses are is Town of Blooming Grove, Milwaukee St itself is the City of Madison's responsibility, this spot is the dividing line between to Aldermanic districts, and it's adjacent to a state owned highway. It's a big mess and no one wants to deal with it even though it's terrifying leaving my neighborhood to get to work and to come back home whether driving or taking the bus.

And now Milwaukee St has a "plan" but not for the spot that I've been pointing out for years; naturally the "plan" ends one block west of addressing a real problem. I'm so beyond frustrated; there is **SO MUCH TRAFFIC**. And now the "plan" wants to put

mixed use housing at the Voit Farm location, move in hundreds of more people one mile down the road from the 4000 block of Milwaukee St, and ignores the fact that these new neighbors will undoubtedly visit the 4000 block of Milwaukee St by being patrons of Kwik Trip and going to McDonald's. I feel like it's just a matter of time until I or someone else gets killed or really injured out there; we're actually really lucky it hasn't happened yet.

Anyway, I hope you take my feedback to heart. Feel free to contact me if you wish if you have any advice or have questions.

Sincerely,

Jeanine Schneider

██████ Bruns Ave.

Madison, WI 53714

608 ██████

██████████████████@gmail.com

-----Original Message-----

From: Fey Nan <[REDACTED]>

Sent: Monday, November 05, 2018 9:50 AM

To: Park Commission <pacommission@cityofmadison.com>

Cc: Reistad, George <GReistad@cityofmadison.com>

Subject: Madison Parks Commission: Attachment to Agenda Item #12

Dear Park Commissioners,

I'm writing as Chair of the Madison Food Policy Council to highlight a memorandum regarding the Milwaukee Street Special Area Plan — Item 12 (Legistar 53472) on your agenda for November 7th, 2018. The Madison Food Policy Council will also be considering this Special Area Plan on Wednesday at 5:30 in the Central Library, with a full discussion of the recommendations in this memo. I expect the vote to include some of them for consideration by other reviewing boards and commissions. The Milwaukee Street Special Area Plan is the first item on our agenda, so the Food Policy Council will have voted on its recommendations in plenty of time for Dan McAuliffe (who will be attending both meetings from the Planning Division) to report in person on the substance of our discussion when it comes up on your agenda later in the evening.

The Urban Agriculture Work Group of the Madison Food Policy Council is uniquely qualified to provide knowledgeable insight and inspiration on how the City can implement its newly adopted, and community supported, values expressed in the Comprehensive Plan for preservation of farmland. Thank you for considering these recommendations.

Nan Fey
Chair, Madison Food Policy Council

TO: Madison Food Policy Council
FROM: Martin Bailkey, Chair, Urban Agriculture Work Group
DATE: November 2, 2018
RE: Urban Ag Work Group Recommendations for
Milwaukee Street Special Area Plan

In March 2018, the Common Council authorized Planning Division staff to prepare detailed land use and transportation recommendations for the Milwaukee Street corridor generally between Fair Oaks Avenue and Highway 51. The largest individual property is the Voit Farm property, just east of Starkweather Creek on the north side of Milwaukee Street. A total of 65 acres, approximately one half of the land, is considered developable while the northern portion is largely comprised of wetlands, floodplains and a quarry pond. Currently a portion of the site is being farmed for row crops, and the remainder is part of a quarry operation.

Planning staff engaged in a series of community engagement activities during the spring and summer. During this period the Madison Food Policy Council's (MFPC) Comprehensive Plan Work Group was focused on creating food system recommendations to the Imagine Madison process, and was not aware of the Milwaukee Street plan effort until Martin Bailkey attended a public input meeting on July 25th. In early August, the draft Milwaukee Street Plan documents were distributed to the Urban Agriculture Work Group for review. The Work Group determined that the draft plan lacked strong adherence to the urban agriculture recommendations recently adopted by the City in the new comprehensive plan (initially generated by the MFPC Comprehensive Plan Work Group). Given that the land within the Milwaukee Street planning area was both historically and perceptually linked with farming, the Urban Agriculture Work Group strongly believed that stronger language supporting market farming and community gardens needed to be in the final plan recommendations.

At the September 5th MFPC meeting, Dan McAuliffe from Planning presented a progress report on the Milwaukee Street Special Area Plan, and members of the Urban Agriculture Work Group, supported by other MFPC members (including alders), stated their concerns. During September and October, members of the Urban Agriculture Work Group, along with Food Policy Director, George Reistad, held additional meetings with city staff. This led to the MFPC becoming one of four formally designated referral bodies for the Milwaukee Street Special Area Plan, along with the Board of Park Commissioners, the Transportation Policy and Planning Board, and the Plan Commission. At its November 7th meeting, the full MFPC will act on the following recommendations from the Work Group that, if enacted, will be provided to the Plan Commission at its November 19th meeting.

Recommendations

The Urban Agriculture Work Group's proposed recommendations to the final Milwaukee Street Special Area Plan involve strengthening the draft plan's existing language on market farming and community gardens in a manner consistent with the supportive language for farms and gardens in other recent city plan documents – the Darbo-Worthington Neighborhood Plan and, in particular, the new City of Madison Comprehensive Plan, on which the Milwaukee Street Special Area Plan's goals and recommendations are organized. A final recommendation, for

later consideration outside of the current area plan process, suggests exploring the use of a city zoning designation to facilitate the future establishment of market farming within the plan area.

The recommendations are as follows:

- Under the Area Plan draft's "Green & Resilient" group of recommendations, the mention of community gardens in Goal 1, Recommendation 5 (p. 25), should be removed from that recommendation and re-inserted within a new, separate recommendation to "Explore the establishment of market farms and community gardens throughout the plan area."
- Under the "Culture & Character" group of recommendations, Goal 1, Recommendation 1 (p. 26) should be changed from "Consider reflecting the existing rural/agrarian design of the Voit Farm area in new development patterns" to: "Look to reinforce the site's history and longstanding public perception as an agricultural site through new development patterns reflecting the concept of *agrihoods*, similar to Troy Gardens on Madison's Northside."
- Under the "Culture & Character" group of recommendations, Goal 1, Recommendation 4 (p. 26) should be changed from "Support community events, i.e. food carts, farmer's markets, and community gardens" to "To promote local food security and food businesses, encourage opportunities for the direct sale of fresh food grown either within the plan area or from nearby farms and gardens, through an onsite seasonal farmers market or farmstand."
- Finally, use this opportunity to explore the future feasibility of using the city's Urban Agricultural District zoning designation for the facilitation of market farming within parts of the plan area. The stated purpose of the Urban Agricultural District is:

...to ensure that urban garden and farm areas are appropriately located and protected to meet needs for local food production, and to enhance community health, community education, garden-related job training, natural resources protection, preservation of green space, and community enjoyment. (MGO 28.093)

This purpose is seen by the Urban Agriculture Work Group as highly compatible with the community aspirations currently in the Area Plan draft; for example, its "Green & Resilient" and "Culture & Character" goals. According to city staff, the Urban Agricultural District designation has been underutilized since its inclusion in the 2009 Zoning Ordinance, with Troy Gardens being the only existing application.

Conclusion

The Urban Agriculture Work Group sees the Milwaukee Street Special Area Plan as a continuation of its advocacy for the inclusion of community food system recommendations in the city's planning and visioning efforts. The Work Group respectfully requests that the MFPC consider the recommendations in this memo, and, if agreeable, formally approve them for submittal to Planning staff and the other referral bodies.

From: Fey Nan <[REDACTED]@gmail.com>
Sent: Wednesday, November 07, 2018 3:08 PM
To: Park Commission <pacommission@cityofmadison.com>
Cc: Miller, Nicole <NMiller@cityofmadison.com>
Subject: Fwd: Information about Voit Pond for Distribution 11/7/2018

Here's the original message and attachment. Nan

From: "Matthew Miller, PhD Soil Science" <[REDACTED]@gmail.com>
Subject: Fwd: Information about Voit Pond for Distribution 11/7/2018
Date: November 7, 2018 at 12:13:00 PM CST
To: [REDACTED]

[REDACTED]
[REDACTED] district2@cityofmadison.com, [REDACTED]
[REDACTED] district18@cityofmadison.com,
[REDACTED]

November 7, 2018
Madison Food Council

Dear Council Members,

Attached is our October 25, 2018 report on a phosphorus removal plan by the City of Madison Engineering Division to use aluminum compounds to remove phosphorus from the stormwaters of the east branch of Starkweather Creek.

We are opposed to any land purchase by the Stormwater Utility of property within the Starkweather Watershed for the purposes of adding aluminum chemicals to the waters therein.

Please note:

A major source of information about the City of Madison plans (A Phase 1 Feasibility Analysis) was issued in March 2016.

The land purchase for the Stormwater Utility may have been an issue that has been before your committee or may come before your committee in the future.

Would you please share this email and the attached informational piece with all your committee members?

Sincerely,

Matthew Miller & John Steines, Friends of Voit Pond

Save Voit Pond  [@gmail.com](mailto: [redacted]@gmail.com)

OUR CONCERN IS THE FUTURE OF VOIT POND



This photo of Voit pond is looking towards the southwest from the northwest rise. (Source: SCS Phase 1 ESA 2018.)

Not many Madisonians know about Voit Pond. Voit Pond is a gravel pit pond or water-table seepage lake. It is on the property northeast of the Fair Oaks Avenue and Milwaukee Street intersection and is owned by the Voit family. This 5-acre spring-fed pond is clear, clean, fresh, and not as subject to algal blooms as Lake Monona. Voit Pond is likely the cleanest surface water in Dane County. Voit Pond was created by the dredging of sand and gravel from the pit to a depth of fifty feet beginning in the 1940's. Voit Pond is adjacent to wetlands (to the east and north) owned by the City of Madison. To the west is Starkweather Creek. **Voit Pond is potentially one of the jewels for the newly expanding Starkweather Parkway Conservancy.**

The five-acre pond presents numerous recreation opportunities including swimming, ice-skating, observing wild life and migratory and songbirds. Lands adjacent to Voit Pond create an unrivaled opportunity to create a park unique in character. The parklands can offer hiking, biking, and cross-country skiing.

NORTH



The above aerial photograph shows the location Voit Pond on Madison's near-east side. Woodman's Grocery is in the lower right (southeast) corner of the photo.

For more information regarding the water resources of Starkweather Creek Watershed please see the Nelson Institute for Environmental Studies University of Wisconsin–Madison Water Resources Management Practicum of 2005. In 2006, they issued a report about the Starkweather Creek Watershed: *Starkweather Creek Watershed: Current Conditions and Improvement Strategies in an Urban Context* <https://nelson.wisc.edu/docs/report.pdf>

Authors' Note: Before we get too far, let us agree on several items.

- We all want the common goal of better lake water quality.
- We agree that the sequestering of phosphorus and suspended solids (dirt) has positive benefits for lake and stream water qualities.
- Where we differ is the methods that are chosen to achieve those ends.
- We are proposing an ecologically constructive approach.

25 October 2018

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Under the authority of the Clean Water Act, the US Environmental Protection Agency mandated that we as a nation clean up our waters. Presently, the City of Madison must reduce its phosphorus additions by treating stormwater and by performing other actions such as rain gardens, street sweeping, and shoreline repair. The City of Madison's progress toward reducing phosphorus and suspended solids is overseen by the Wisconsin Department of Natural Resources.

Initially, back in 2013, a phosphorus /suspended solids settling pond was proposed by the City of Madison to be located behind the Garver Feed Mill, north of Olbrich Botanical Gardens. This location was rejected by the Schenk-Atwood-Starkweather-Yahara Neighborhood Association Board of Directors in a letter to the City of Madison dated January 8, 2013.

Under pressure from the WDNR another location had to be found. Recently, the Voit property has come up for sale. City of Madison Planning has put together a proposal for housing units to be placed on the southern part of the Voit property. The City of Madison Stormwater Utility plans to purchase the northern part of the Voit property. The northern part contains significant features. Beside Voit Pond, there are more wetlands, old channels of Starkweather Creek, the current path of Starkweather Creek next to the railroad tracks and an 8-acre mound of fill that was approved by the Wisconsin DNR in 2005. The letter of permission allowed Voit to fill a dredged pond (similar in surface area to Voit Pond) with thousands of tons of road debris. Now it makes a great hill that should have a nice view of the wetlands below and Voit Pond.

But this hunt for phosphorus reduction has inspired the use of aluminum chemistry to be considered for a quick fix to the problem. Later in the letter we will propose an alternative.

To address the phosphorus reduction mandate, City of Madison Engineers put together a request for proposal that specified exactly what the contracting engineering firm would perform to satisfy their contract with the City.

Brown and Caldwell (BC) are engineers from Milwaukee and they prepared a project report for the City of Madison dated March 31, 2016. The content of the report is based upon the tasks listed in the contract between BC and the City. The **Phase 1 Feasibility Analysis: Use of Coagulant for Phosphorus Treatment at Starkweather Creek** report is available on the City of Madison Engineering web site at <http://www.cityofmadison.com/engineering/projects/starkweather-treatment>

After reviewing the March 2016 feasibility report, it is clear that the City proposes to remove the phosphorus and suspended solids from the waters from the East Branch of Starkweather Creek with aluminum chemicals and polymers, using Voit Pond as a settling pond. The aluminum chemicals are called flocculants or coagulants. The aluminum forms complexes with phosphorus and other compounds and sinks to the bottom of the settling pond due to their high density. The engineers predict they will add 33,800 gallons of aluminum flocculent each year to Voit Pond. They predict they will need to de-water 4,000,000 gallons of wet floc and will need to dispose of 2,500 cubic yards of dried floc annually. As you can imagine, the wrestling of millions of gallons of floc sludge sound quite labor intensive. Unfortunately the Coagulation Project will endanger this spring-fed urban wonder.

The Phosphorus Coagulation Project at Voit Pond plans to meet 10% of the City's phosphorus removal goals. This 10% looks really good to the decision makers with all the 10% phosphorus reduction coming from one location. Let us look at some of the real and possible problems, unintended consequences, and potential cost overruns:

- Voit Pond is too large for an effective phosphorus removal project. The people of Madison would be better served if the City engineers found a different location for treating water in small cells that could be individually managed based on the changing chemistry of the stormwater as needed. The present proposed design seems to try to economize by using the existing Voit Pond and then reverse engineering the rest of the project to handle such a large water volume.
- In order to make the Voit Pond function as a settling pond for the Coagulation Project, Voit Pond must be partially filled in. This action will **destroy the spring** (plans are to permanently fill in the bottom 20 feet of the sand/gravel pit).
- In order to make room for this coagulation water treatment scheme, the elevation of the surface of this newly created "settling pond" must be kept 10 feet below the current pond surface. Voit Pond's location near the wetlands and near the Creek will require continuous pumping using significant amounts of electricity to maintain the 10-foot level drop. The engineers might say they could install a clay liner in Voit Pond to control seepage. This would be very costly. A clay liner is not a sure cure to stop natural seepage from the wetlands into Voit Pond when the Voit Pond surface is lowered. Perhaps the engineers have changed their plan.
- The implementation of this Coagulation Project will remove the possibility of swimming in the pond, now and in the future. **Permanently. Forever.**

- During the flooding of 2018, water has been standing in Starkweather Creek and Voit Pond at about the same level as Lake Monona, about one mile downstream. This is a huge problem for the engineers. There is nowhere for the “treated water” to go....
- The project as designed was located in the floodplain of Starkweather Creek (see Brown and Caldwell’s simplification of the complex FEMA FIRM 2014 map of floodway and floodplain near Voit Pond on the next page). Floods can ruin equipment and infrastructure such as the pumps, gages, and electronics in the buildings that house the mixing apparatus and storage of aluminum product. To overcome the flooding limitation, the engineers re-mapped the area around Voit Pond and found that “the existing quarry* pond is no longer in the mapped floodway”. The City and engineers applied for and received approval from the Wisconsin DNR and the Federal Emergency Management Agency (FEMA). This enables the engineers to build the project where it would not have been built using the 2014 FEMA map. After the 2018 heavy rains in August and subsequent flooding, one wonders whether constructing the project in the so-called area of “one-percent annual chance flood hazard” should be re-considered.

* The reference to the “gravel pit” pond as a “**quarry**” pond is incorrect. The historical and present topographic maps of the United States Geological Survey (USGS) define the feature as a **gravel pit**. The word “quarry” is reserved for pits where hard-rock material is removed. Gravel pit refers to a pit where loose, unconsolidated sand and gravel are excavated, especially in glaciated regions of the United States. Salmo Park is an example of a quarry pond in Dane County.

This project is not appropriate for the center of a public park. Trucks, chemicals, fences are not good for a park. Alternatively, the northern Voit Property would make a nice park without the aluminum project in Voit Pond.

The Stakes are also high for our Dane County ecosystem and for our City economy

Adding to the import of the Voit Pond / Aluminum **issue resolution** is that, if this proposed project slated for Voit Pond is "successful", then the City of Madison proposes to replicate pouring thousands of gallons aluminum compounds each year into **at least 4 other sites within the City of Madison**.

So far, more than \$5,000,000 City of Madison Storm Utility dollars have been approved for the Phosphorus Coagulation Project at Voit Pond. These monies are from funds that we pay on our water utility bill each month. Dane County has pledged an additional \$1,000,000.



Not only is the proposed project a bad fit for Voigt Pond; it would be a mistake to locate such a project in anywhere in Dane County.

- First, aluminum and chlorine are toxic substances that kill life. Bauxite is mined in Australia, China, India, and Russia. The processing of bauxite into aluminum is chemically and electrically intensive and uses lots of water. The production of chlorine involves mercury and also lots of electricity and water. Do we want a phosphorus reduction program that supports this mega-

conglomeration of mining, transportation, chemical manufacture, electrical generation, and the water treatment industries? What other choices exist?

- Second, the addition of chemicals directly into the ecosystem in order to try to cover up other past environmental wounds on the earth is a failed path to take. As an addendum to this letter there is an example of the cascading consequences that administrative decisions can have on both unforeseen short-term and long-term effects of chemically altering surface water chemistry.
- Third, the EPA lists constructed wetlands as an effective solution. Constructed wetlands have been used all over the world and require considerably less infrastructure than chemically-based treatment systems. There should be ample city-owned land to construct a wetland that can be designed to clean the waters without the use of aluminum compounds. Examples of constructed wetlands in Wisconsin can be found in Belgium, Kewaunee, Lomira, Marion and on the Red Cliff and Oneida Indian Reservations. Harvesting vegetation from constructed wetlands is the least expensive method to sequester phosphorus.

An example of one environmental engineering firm that creates constructed wetlands is Constructed Wetlands Group, Inc. They fill a key niche in the wastewater treatment sector by improving biosolids handling techniques. Following are eight facts regarding their reed beds (constructed wetlands).

- Reduce volume of sludge up to 90%
- Dewater sludge through the root structure providing a hydraulic conduit and drainage of supernatant and water from biosolids
- Phragmites take up and release water through evapo-transpiration
- Mature monoculture of reeds effectively assimilates up to equivalent of 40-45 inches of accrued precipitation
- Extensive root structure provides environment for diverse and active microflora
- Mature plants transfer oxygen to root system, even against the pressure of six feet of water
- Reduction of volatile solids as low as 20-25%
- Eliminates the need for removal of the sludge residue for six to twelve years

The engineering firm that put together the Phosphorus Coagulation Feasibility report for Voit Pond is **Brown and Caldwell** from Milwaukee. One of the authors of the feasibility study is Jeffrey L. Herr, P.E., D.WRE from Brown and Caldwell's Atlanta Georgia office.

Mr. Herr has worked at Brown and Caldwell since 2008. Herr has worked on more than 35 chemical stormwater treatment projects; most are in Florida, based on the resume provided on the Brown and Caldwell website. Prior to his present position, Mr. Herr worked with Harry H. Harper, PhD, PE, of Environmental Research and Design, Incorporated (ERD) of Florida. Dr. Harper's firm has been

responsible for most of the chemical treatment schemes in Florida. There appears to be a tight knit group that advocates aluminum treatment. The aluminum proponents also do not appear amenable to debate of the risks of the practice of using aluminum to remove phosphorus from surface waters and they minimize concerns that are raised by citizens and residents.

With the above background we can carefully examine the feasibility report issued by Brown and Caldwell to the City of Madison on March 31, 2016.

There are serious problems in their report:

- It appears that crucial data referred to in the report are missing from report. [The first page of a two-page spreadsheet of analytical results is missing from the report. Rather the second page of the spreadsheet is printed in the report twice.]
- Aluminum additions are said to cause an approximate 90% reduction in phosphorus. Settling alone can remove 45% of the phosphorus, so it would be more genuine to state --“the added aluminum technology increased phosphorus removal by another 45% over simple settling of the water.” In this way it is easier to see that the cost of adding the aluminum as a tool in removing phosphorus is higher when one considers that half the amount can be removed for much less money.
- In order to make sure that the project could proceed, Brown and Caldwell had to have the FEMA FIRM flood map changed. The changes were approved by the Wisconsin Department of Natural Resources and the Federal Emergency Management Agency (FEMA) using a letter of map revision (LOMR). The September 17, 2016 approval allows the project to be sited at Voit Pond. The new 2016 map should be field checked as there appear to be some errors in the map presented as part of the feasibility report.
- Still, the Voit Pond area is subject to flooding now, and in the future. We are concerned of the possibility of an unplanned release of the aluminum compound into Starkweather Creek.

Perhaps what is more important is what is left out of the report:

- There are **no peer-reviewed articles** presented in the report as evidence to support the project. The literature review in the introduction includes only one entry. And this is for a presentation given by Herr at a Stormwater Conference in 2009 about the benefits of aluminum technology. There are no references to previous local studies or reports.
- There is **no discussion** in the report regarding the risks, health and safety hazards that the proposed project presents to the ecosystem and to the people in the City of Madison.

- There is no discussion of exactly which **polluting chemical compounds** have historically been found in the stormwater in the East Branch of Starkweather Creek.
- There appear **no significant baseline chemical characterization** of Voit Pond; simple measurements of only dissolved oxygen, temperature and pH is insufficient. Since Voit Pond will be receiving contaminated waters from Starkweather Creek, the cleaner waters of Voit Pond should be thoroughly studied so that we all understand the water resource that is slated for degradation.
- There is **no meaningful discussion of non-chemical alternatives** such as constructed wetlands.
- There is **no discussion about alternate locations** for the coagulation project.
- There was **no discussion of project impacts** on Voit Pond, its birds, animals and humans.
- There is no discussion regarding the **impacts of winds mixing pond waters**. High winds can cause considerable mixing in lakes.
- There is no discussion of the **effects of seasonal lake mixing** on the aluminum in the settling pond.

Our concern is that it is now apparent that some seriously wrong decisions are being made that will have ramifications far into Madison's future. In the report of their proposed design for Voit Pond, Brown and Caldwell state that the "use of this technology in northern climates is relatively untested." Has the sound of an experiment.

We contend that the City of Madison Engineering did not adequately scope the request for proposal to include the many risks associated with their experimental aluminum project.

Upon reviewing the Brown and Caldwell feasibility report we did our due diligence research and found many negative factors about the "**relatively untested**" practice of adding toxic aluminum and chlorine to our waters in the northern United States and Canada.

To read a comprehensive report on some ecological risks associated with adding aluminum and other metals to water bodies see the Canadian report below. In that 2008 report, research on the effect of added aluminum smothering the **gills of fish** and on other benthic life is presented.

PRIORITY SUBSTANCES LIST ASSESSMENT REPORT FOLLOW-UP TO THE STATE OF SCIENCE REPORT, 2000: Aluminum Chloride, Aluminum Nitrate, Aluminum Sulphate

Chemical Abstracts Service Registry Numbers: 7446-70-0, 13473-90-0, 10043-01-3

Environment Canada & Health Canada November 2008

https://www.ec.gc.ca/lcpe-cepa/09F567A7-B1EE-1FEE-73DB-8AE6C1EB7658/al_salts-eng.pdf

If the City of Madison insists on continuing their pursuance of a phosphorus removal project, we propose an alternate location. This alternate location for a phosphorus removal project meets many of the City of

Madison siting criteria used for the Coagulation Project. The location of a project at Dempsey Drain would not interfere with the Starkweather Parkway Conservancy.

Dempsey Drain runs parallel to the Capital City Bike / Pedestrian Trail and the railway (the area north of the baseball diamonds at Olbrich Park just north of Atwood Avenue - approximately 1400 feet in length from Starkweather Creek and Walter Street.



Dempsey Drain is downstream from Voit Pond. A phosphorus removal project located at the Dempsey Drain location will enhance the removal of phosphorus and suspended solids from the **entire Starkweather Creek Watershed, not just the East Branch; The East Branch accounts for only 35% of the watershed.**

- The Dempsey Drainage design could include state-of-the-art educational exhibits and offer timely workshops that promote low-tech, economical, urban-friendly stormwater treatment technology. We can make Dempsey Drain a water quality tourist destination stop.
- The City already owns the easily accessible land at Dempsey Drain. From Starkweather Creek all the way to Cottage Grove Road is a distance of 6,400 feet. This extended length allows for the construction of sequential treatment cells of constructed wetland located in Dempsey Drain.
- The properties directly adjacent to Dempsey Drain do not have houses.

Public Involvement in the Process

Part of the EPA requirement of the implementation of the phosphorus rules is that public input must be included in the process of choosing methods of implementation and the location of implementation. The coagulation project supporters will say that the public already has had a chance for input into the methodology used and the proposed locations of projects. Back in 2016, the City of Madison and Brown and Caldwell held an informational meeting about the coagulation project.

The slide presentation from the July 21, 2016 public informational meeting topics is available here:
<http://www.cityofmadison.com/engineering/stormwater/documents/StarkweatherPIMPresentationFINAL.pdf>

As in their report, Brown and Caldwell promote the use of chemicals to control phosphorus as the only

option presented and with aluminum chemicals as the preferred method.

We do not feel that there has been sufficient opportunity for a concerned public to have the necessary input before the decision is made about what to do and where to do it.

In conclusion:

- We are all in agreement that decreasing phosphorus to the lakes is important, but we differ in how phosphorus reduction goals should be obtained.
- Voit Pond is not an appropriate location for the coagulation project due to chemical and hydrologic factors.
- There needs to be more public information meetings and discussion about non-chemical alternatives to controlling unwanted phosphorus and sediment from entering our lakes.

We plan on reaching out to the City of Madison and sharing our concerns.

1. We ask the City of Madison to **abandon all efforts** to locate the Coagulation Project at Voit Pond. Immediately.
2. We ask the City of Madison to **research using constructed wetlands** as an alternative to aluminum technology.
3. We ask the City of Madison to **examine the phosphorus removal potential of Dempsey Drain**.

Of you, the reader, we ask that you visit our facebook page **Voit Pond** for updates as we go through the process of exploring the alternatives for phosphorus reduction and removal in the City of Madison.

Email contact: SavePond2018@gmail.com

Note: Your name and email address will NOT be shared unless you give permission.... Anonymous observations are always welcome.

Matthew Miller, PhD, Soil Scientist from Hudson Park &

20-year resident of the Schenk Atwood Starkweather-Yahara Neighborhood

John Steines, co-founder of Friends of Starkweather Creek (FSC). FSC Co-chair 2002-2012.

When we add aluminum to our waters are we simply repeating the past series of un-informed mistakes?

Addendum

An example of "things that can go wrong" is the legacy of the Fairmont Lakes in Minnesota. In hopes of "cleaner" lake water, somebody added tons of copper sulfate to the lakes. Please note that copper and aluminum have different profiles and behave differently in the ecosystem. We are not saying these same long- and short-term effects of aluminum will be the same as copper. The example of Fairmont Lakes shows us how decisions made

early in a project can have a set of **cascading consequences** that are only noticed in hindsight.

Scientists who have been following the health and character of the Fairmont Lakes had this to say in 1984 and again in 2007: "Data collected since treatment of the Fairmont Lakes began in 1921 provide alarming insights into lake responses to sustained chemical treatment with copper sulfate. Short-term and long-term effects have occurred.

Short-term effects include:

- a) the intended temporary killing of algae,
- b) dissolved oxygen depletion by decomposition of dead algae,
- c) accelerated phosphorus recycling from the lake bed and recovery of the algal population within 7 to 21 days, and
- d) occasional fish kills due to oxygen depletion or copper toxicity or both.

Long-term effects are shown to include:

- a) copper accumulation in the sediments,
- b) tolerance adjustments of certain species of algae to higher copper sulfate dosages,
- c) shift of species from green to blue-green algae and from game fish to rough fish
- d) disappearance of macrophytes, and
- e) reductions in benthic macroinvertebrates.

The conclusion is that while copper sulfate treatments enjoy great popularity because they kill and remove algae almost instantaneously, other immediate or cumulative side effects can be harmful to many other aquatic organisms."

Source: Mark J. Hanson and Heinz G. Stefan (1984). *Side effects of 58 years of copper sulfate treatment of the Fairmont Lakes, Minnesota* *JAWRA Journal of the American Water Resources Association* 20(6):889 - 900 DOI: 10.1111/j.1752-

1688.1984.tb04797.x

https://www.researchgate.net/publication/230009219_Side_effects_of_58_years_of_copper_sulfate_treatment_of_the_Fairmont_Lakes_Minnesota

While the above study deals with additions of copper sulfate to surface waters in Minnesota, we do not have sufficient experience with experimental additions of aluminum products to our dimictic lakes in order to be sure that we are first doing no harm to the ecosystem.

From: Carl Landsness <[REDACTED]@yahoo.com>
Sent: Wednesday, November 07, 2018 2:35 PM
To: Park Commission <pacommission@cityofmadison.com>; Rutledge, Kay <KRutledge@cityofmadison.com>; Knepp, Eric <EKnepp@cityofmadison.com>
Cc: Si Widstrand <[REDACTED]@gmail.com>; Lance Green <[REDACTED]@aol.com>; McAuliffe, Daniel <DMcAuliffe@cityofmadison.com>; Shea, Ann <AShea@cityofmadison.com>; Hartley, Tracey <THartley@cityofmadison.com>; Ahrens, David <district15@cityofmadison.com>
Subject: Parks Commission agenda #12: Milwaukee St Plan

Agenda

#12: <https://madison.legistar.com/LegislationDetail.aspx?ID=3698422&GUID=B8511FDF-9E69-4192-86C6-C5932613D563>

Dear Parks Commissioners,

I write as [Friends of Starkweather](#) Co-Chair (but not speaking **for** the Friends) and as native/current resident of the area.

I and the Friends (FSC) have long grappled with the many very diverse and unique challenges and opportunities of this area... being actively involved in **many** meetings and activities affecting this and nearby areas (including the public input meetings for this plan)... plus meeting with Dan M. I/we acknowledge the unique challenges and unknowns of this area... and the challenges of balancing so many conflicting interests, needs, desires, opinions and resources.

While FSC dreams of a continuous green corridor from the Starkweather Creek mouth to Hwy 30 (or beyond)... we realize the many barriers to such. And while we might prefer the green corridor to be fully natural or restored (e.g. wetlands)... we realize that wisely developed parks, homes, businesses and transportation corridors can complement or contribute to such dreams. Therefore... I and FSC have felt generally supportive of [the draft plan](#) (and [comments](#) I read from Urban Agriculture Workgroup)... trusting that the plan (and city staff) are flexible enough to work with future changes.

That said... FSC has recently received a bold alternative proposal (from local champions) for the Voit pond project that intrigues us... but with too many unanswered questions to comment much until after our Nov. board meeting. It would use the uniquely clean water pond as public park space (e.g. expanding the adjacent [Starkweather Conservation Park](#)).

Lastly... I wish to applaud Eric, Tracey and Ann for their initiatives and support for the very fulfilling and popular [Bird and Nature](#) collaborations... plus last week's [Flood Cleanup Challenge](#) (in very challenging weather). They have fed my soul in huge ways... especially seeing how they feed the souls of so many kids and adults suffering from severe [Nature Deficit Disorder](#).

Carl Landsness, Friends of Starkweather Co-Chair
(and Starkweather native, invasive, peacemaker and troublemaker)