May 12, 2020

MILWAUKEE RIVERKEEPER
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Mikko Hilvo
City Administrator
City of Cedarburg
W63 N645 Washington Avenue
P.O. Box 49
Cedarburg, WI 53012

RE: Support for Consideration of Dam Removal in Cedarburg

Dear Mikko,

On behalf of Milwaukee Riverkeeper, I am providing this letter in support of the City of Cedarburg's consideration of dam removal as an option for 1 or more of your dams on Cedar Creek. It is my understanding that the Landmarks Commission will be meeting on May 14th to recognize any historical significance of the local dams and determine any appropriate preservation efforts. As such, I would appreciate it if you would forward these comments to the Common Council as well as the Landmark Commission and any other relevant committees prior to that vote.

Milwaukee Riverkeeper is a non-profit organization dedicated to protecting water quality and wildlife habitat, and advocating for sound land use in the Milwaukee River Basin. I was able to attend the April 27th Common Council meeting to hear the presentations of Marty Melchior from Interfluve and Paul Hayes, as well as viewpoints of several citizens and council members on Cedarburg's historic dams.

After reviewing this matter, it is our position that a new vision for a more natural Cedar Creek is the best option, both financially and environmentally, for the City. We strongly urge you to retain dam removal as an option as you move forward with your alternative analysis.

There are many factors to consider with both dam repair or removal. While each dam is unique, in general, dam removal is often the cheaper option than dam repair by orders of magnitude. Complying with new State and Federal Dam Safety and FEMA Standards can be very expensive, and ongoing operations and maintenance on old structures will increase over time. Repair of Estabrook Dam was estimated at 3-5 times the projected removal cost (the actual removal costs were nearly $1 million less), including ongoing operations and maintenance, and this would have only extended the life expectancy of that structure for 20 years. In addition, there are multiple funding opportunities available for dam removal in the Milwaukee River Basin, including the Great Lakes Restoration Initiative and Fund for Lake Michigan. Many communities remove dams at little to no cost to their community due to availability of grant funds, and there are no comparable sources of funding for dam repair. With anticipated increases in severe wet weather and flooding events predicted (2018 and 2019 both broke rainfall records in southeast Wisconsin) the safety risks and

liability of not adequately maintaining these old structures will also increase. If these dams fail, they could cause loss of life or property, which is the basis for the state dam safety program. Failure of the Hamilton Dam caused contamination from Cedar Creek to extend all the way to the Thiensville Dam, complicating future projects, and degrading the environment.

Dam removal is also, in almost every case, better for the environment. All dams collect sediment, degrade water quality and wildlife habitat, and inhibit fish passage. There is no benefit to fisheries from keeping dam impoundments or ponds. Removing dams would improve habitat and conditions for native fish, such as pike, walleye, and bass, and allow these fish to access spawning areas upstream in Cedar Creek. A restored Cedar Creek would likely support many if not all of the species that are currently using the existing ponds. Migrating salmonids such as salmon and steelhead would likely migrate up the creek as well, providing a different type of angling opportunity. A restored creek would also provide habitat for frogs, turtles, birds, and other wildlife. In fact, as part of a dam removal project, wetland and floodplain habitat for wildlife could be dramatically improved in areas of the former impoundments. In general, removing dams improves fisheries and fishing opportunities, as well as conditions for wildlife.

Removing dams would benefit paddlers by removing several safety hazards in the downstream portion of the Creek, and improving water quality and aesthetic beauty of the creek. The algae blooms, especially in the Ruck Pond, have become very severe and unsightly. While there is a lot of work to reduce nutrients getting into the Creek from upstream (which many are working on as part of the Milwaukee River TMDL and farmer outreach work), the conditions for nuisance plant growth are exacerbated by warmer temperatures caused by the impoundment. Free flowing rivers do not have as many issues with algae accumulation as impoundments, except for during very low flows. There could be macrophyte or bottom rooted vegetation that would pop up, similar to what you see in the Milwaukee River at Highway C or Highway T or upstream portions of Cedar Creek during summer months. A free flowing and beautiful creek could be a great asset to Cedarburg, different to, but just as special, as the ponds created by the former mill dams.

No evidence exists that removing dams is bad for property values. In fact, most studies have shown no effect on property values or improved property values. Removing North Avenue Dam in Milwaukee and the Woolen Mills Dam in West Bend have both allowed for restoration of riverfront land, creation of trails, and increases in community benefits. Projects can be designed to accommodate a diversity of community uses, to protect property from flooding, and ensure water levels and "wetted" area of the newly restored creek is acceptable to neighbors.

One of the biggest cost items for many dam removals is removal of contaminated sediments that lie behind these dams, but Cedarburg is well ahead of the curve there due to the Mercury Marine project that removed contaminated sediments from the Wire & Nail impoundment and Columbia Pond, as well as past efforts to remove sediment from the Ruck Pond. Dam removal doesn't have to be an all or nothing situation. It is possible that several dams could be removed and others left in—with or without modifications—that

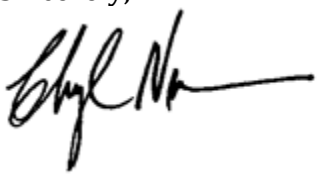
include safer portages for paddlers and improved riverfront trails. There is also an option to remove a dam to create a free flowing stream, while still keeping an offline pond for recreation and to support events such as the bed races and pumpkin paddle. Engaging community events could also happen on or in a newly restored creek!

In addition, it is our experience in recent years that a state or local historic designation doesn't necessarily stop dam removal—it didn't with Estabrook Dam-- but it can make it more complicated and expensive. If dam removal becomes the chosen option, historical recognition can increase costs and complicate an already complex project. For example, as part of the Lime Kiln Dam removal in Grafton, several of the raceway walls were retained and signage installed. With Estabrook Dam, Riverkeeper is assisting with installation of sculptures made of former dam elements and historic signage as a way of mitigating historic impacts with that dam removal.

In conclusion, Milwaukee Riverkeeper urges Cedarburg to fully consider all your options for the Cedar Creek dams, including dam removal. To that end, we encourage you to not pursue historic designation for these structures at this time. Milwaukee Riverkeeper supports dam removal as the best option for improving the water quality and wildlife of Cedar Creek. This is a great opportunity to determine a future vision for Cedar Creek that considers Cedarburg's community needs and history while also protecting water quality, improving wildlife habitat, reducing flood risk, decreasing costs, and enhancing quality of life.

Thank you for your consideration of these comments.

Sincerely,



Cheryl Nenn
Riverkeeper

Cc: Jennifer Bolger Breceda, Executive Director