



State of Ohio Environmental Protection Agency

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October 26, 2010

Ms. Tammy Crabtree
3470 Iddings Road
West Milton, OH 45383

Re: Proposed West Milton Dam Removal project

Dear Ms. Crabtree,

Thank you for your letter of October 12, 2010, which I received that same day via e-mail, regarding your concerns about the proposal to remove the dam on the Stillwater River at West Milton. Attached are my responses to your points. Please note that I have organized my reply to address the main topics you raise.

In responding to your individual concerns, it is important for you to know that our Water Pollution Control Loan Fund (WPCLF) program is intended to help achieve the goals of the federal Clean Water Act, especially the goal of restoring the physical, chemical, and biological integrity of the nation's water resources. In that regard, any project that restores the free-flowing characteristics of a river is considered highly desirable.

I would also like to emphasize that our nomination process under the WPCLF Water Resource Restoration Sponsor Program (WRRSP) is an open, albeit very competitive, one. Anyone can nominate a river or wetland protection or restoration project for WRRSP funding. This generally results in a relatively small universe of nominated WRRSP candidates each year, which are scored primarily on the water quality information our agency has about the water resource in question (but not on dam safety, flood control, or other non water quality factors).

Thank you for your letter and the concerns you raise. While some of your concerns are outside the scope of our review, ultimately, it is the City of West Milton, as owner of the dam, who will decide how to use it. Should you have any further questions upon review of our attached responses, please let me know.

Sincerely,

Kevin Hinkle
Ohio EPA
Division of Environmental and Financial Assistance

KH/djh

enclosure

cc: Reading/File

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

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1. Previous Studies of Dam Removal Projects. In the stream corridor restoration literature, there are numerous discussions about the benefits of dam removal. As one example, the October 1998 manual, Stream Corridor Restoration (Principles, Processes, and Practices), prepared by the U.S. Department of Agriculture, provides a summary of how dams and other disturbances affect stream corridors (see Chapter 3), and how to design restoration projects (see Chapter 8). While this handbook notes that modifying the operation and management of dams, in concert with best management practices, can effectively partially restore stream corridors below dams, "dam removal is the only way to begin to fully restore a stream to its natural condition." This is not to say that restoration can proceed without caution. Rather, care needs to be exercised to understand how bed and bank stability and sediment loads will be affected by the dam removal activities.

More recently, Ohio EPA has prepared reports on the outcomes of dam removal in central and northeast Ohio. These reports are available on our Division of Surface Water's web site at http://www.epa.state.oh.us/dsw/document_index/psdindx.aspx and cover dam removals from the Olentangy River (<http://www.epa.state.oh.us/portals/35/documents/OlentangyDelawareDamRemovals2009.pdf>) and the Middle Cuyahoga River (<http://www.epa.state.oh.us/portals/35/documents/MiddleCuyahoga2007final-amended2.pdf>). These same studies explain how the recreational uses of a free-flowing river are different from those associated with a ponded environment, and, in some ways, superior from a fisheries, food web, and habitat standpoint (see Page 5 of the Middle Cuyahoga River study). If you have not already done so, you may want to familiarize yourself with our agency's reports on the conditions in the Stillwater River. These biological reports can be found at the first web site link provided above and the related TMDL studies on the Stillwater River at <http://www.epa.state.oh.us/dsw/tmdl/StillwaterRiverTMDL.aspx>. I specifically referred to the following report while reviewing your comments:

Biological and Sediment Quality, Study of the Stillwater River Garland Road Landfill, 1994; Miami and Montgomery Counties, Ohio, August 1, 1995
OEPA Technical Report MAS/1995-8-8.

2. Current Condition of Project Area. After reviewing previous studies of the Stillwater River, I conferred with personnel from our Division of Surface Water about the effects that the low-head dam at West Milton is likely having on water quality and biota at present. From these exchanges, in part because of the parallels between the effects of the Englewood Dam and the West Milton low-head dams on water quality and biota, we fully expect that the Stillwater River at the West Milton impoundment is in non-attainment of the designated water quality standards for the remaining, free-flowing portions of the river (exceptional warmwater habitat). Please see Page B-1 of Appendix

B: 2008 Assessment of Englewood Dam Area appearing in the final Stillwater TMDL report cited above. These same studies of dam removal efforts also have shown that the pollutant assimilative capacity of streams and rivers generally increase after dams are removed. Thus, while the river may continue to transport the same amount of pollutants until they reach the dam location, the West Milton dam's removal will improve how the Stillwater River assimilates this ongoing pollutant loading.

3. Project Scope. During our review of the proposed project to date, we have commented on the proposed scope of the project and sought to better understand the area where restoration activities will need to be conducted. In one of our recent comments, we specifically pointed out that the project cost estimate may be unrealistic without a determination of the amount and cost of streambank stabilization required, bearing in mind uncertainties about the condition of the land after the dam is removed and the fine sediment that may be present along the river banks upon project completion. Please also note that the applicant is aware that as much as four miles of river bank (two miles on each shore) along the upstream pool may need restoration. The figure of 800 feet is probably invalid. To the extent mudflats and bush honeysuckle may become a land management concern, the applicant has been informed to prepare a management plan for the property occupied by the dam, and the adjacent land owned by West Milton that takes these concerns into account. Please note that restoration of any lands outside the village's property encompassing the footprint of the dam is ineligible for the WRRSP program.

4. Water Supply. We have communicated with the applicant that any relevant concerns related to water supplies need to be discussed with the affected property owners and appropriate steps taken to address them. Funds from sources other than the WRRSP program are available, if needed, to provide water supplies to potentially affected residents.

5. Exotic Species. Control of exotic invasive species (whether aquatic or terrestrial) is a concern to this agency. Accordingly, we expect our applicants for WRRSP funds to develop control measures to limit invasive species encroachment into areas undergoing restoration. This project will be handled no differently than others.

6. Electricity. While the idea of generating energy from "green" sources is attractive, the use of low-head dam sites to generate electricity at the expense of protecting and restoring water quality is not. Instead, we support dam removal projects because they result in the restoration of free-flowing rivers and streams, which is a major water quality improvement.