

Public Comments American Cyanamid Draft RP/EA

Subject: General Favorable Response

Heather Fenyk, Ph.D., AICP/PP

Received Fri, May 27, 2016 at 6:07 PM

Dear Mr. Alderson -

Please see the attached letter - the Lower Raritan Watershed Partnership's response to NOAA's invitation to public comment on the American Cyanamid Draft RP/EA.

The Lower Raritan Watershed Partnership has reviewed NOAA's proposed Restoration Plan/ Environmental Assessment (RP/EA) for the American Cyanamid Co. Superfund Site, Bridgewater Township, Somerset County, New Jersey and fully supports the proposal for primary and compensatory restoration activities.

The LRWP is New Jersey's newest watershed association, formed in 2014 to address legacy contamination and current pollution in the Raritan River and the Lower Raritan Watershed. Our mission is to conserve, enhance and restore the natural resources of the New Jersey Watershed Management Area 9, the Lower Raritan Watershed. We believe that not only will removal of the Weston Mill Dam on the Millstone River directly improve resources impacted by legacy contamination, it is our understanding that the proposed project will benefit a broad spectrum of the Raritan River's ecology and will likewise enable other environmental and human use benefits. Significant ecological, environmental and human use benefits have in fact already been realized following recent removal of a series of dams (Robert Street, Nevius Street and Calco) on the lower portion of the Raritan River between the towns of Bridgewater and Bound Brook. Likewise, we expect that design of technical fish passage at the Island Farm Weir (located on the Raritan River) will advance multiple Lower Raritan Watershed stakeholder goals.

The LRWP is also aware that the removal of the Weston Mill Dam on the Millstone River, as well as future modifications at the Island Farm Weir to include a technical fish passage at the Island Farm Weir on the Raritan River, will expand access to several thousand acres of non-tidal freshwater mid to upper reaches of the Raritan River's major tributaries. Removal of Weston Mill Dam and the construction of a technical fish passage at Island Farm Weir will significantly enhance maturation and rearing habitat for striped bass, American shad, American eel, blueback herring, and alewife, and should significantly increase the abundance of anadromous and catadromous species, which will improve the ecological health of the Raritan River.

Enhancing fish populations in the Raritan River system is important for fresh and marine ecosystems. It is especially appropriate as the National Marine Fisheries Service (NMFS) lists the estuarine portion of the Raritan River as an important migratory pathway for anadromous alewife and blueback herring, species which NOAA lists as of special concern. The Lower Raritan Watershed Partnership feels that the proposed projects could help to reverse declining population trends, and anadromous fish returning to spawn each spring in the Raritan River provide an attraction to the general public in the Raritan River Basin. The removal of the Weston Mill Dam on the Millstone River and feasibility analysis and design of technical fish passage at the Island Farm Weir are important to the LRWP and we fully support the proposed projects.

Sincerely,

Heather Fenyk, Ph.D., AICP/PP

President, Lower Raritan Watershed Partnership

Susan Hoenig

Received Fri, Jun 3, 2016 at 7:25 AM

Mr. Alderson,
Please restore the Western Mill Dam to restore river habitat and improve fish passage at the Island Farm Weir. This is important for our eco-system!

Mary Pinney

Received Fri, Jun 3, 2016 at 3:04 PM

Dear Mr. Alderson,
I am writing to support the petition to the NJ DEP remove the Weston Dam from the Millstone River and to improve fish passage at the Island Farm Weir.

I am a member of the Millstone Township Environmental Commission and deeply concerned about our natural environment.

Annarie Lyles

Received Sat, Jun 4, 2016 at 1:20 PM

Dear Mr. Alderson,

I am writing in support of the proposal to remove the Weston Mill Dam and also to improve the fish passage at the Island Farm. It would be thrilling to see shad and other fish runs in a more fully restored river. We are truly fortunate to have this opportunity to improve the health of our ecosystems.

Nat Bottigheimer

Received Sun, Jun 5, 2016 at 7:29 AM

Mr. Alderson--

I have reviewed the RP/EA for the American Cyanamid Company Superfund site in Bridgewater Township. I am comfortable with the analysis of alternatives, and I strongly support the report's recommendation to remove the Weston Mill Dam, restore river habitat, and improve fish passage at the Island Farm Weir. I am a recreational user of paths along the Millstone River; a freshwater and saltwater fisherman; and an advocate of the restoration of waterways to support water quality and wildlife habitat improvement.

Please include me in any future communications related to the ultimate disposition of the Weston Dam as it relates to the American Cyanamid Superfund site remediation.

Walter Andrews

Received Tue, Jun 7, 2016 at 10:28 AM

Dear Mr Alderson:

I support the plan to remove the Weston Mills Dam on the Millstone River to facilitate

migration of shad and other migratory fish species to spawning waters upstream of Raritan Bay. The Millstone Dam is no longer relevant today and serves as impediment to natural functions in the Millstone River.

Thanks,
Walter Andrews, Chairman
Franklin Twp Environmental Commission

Angelique Wurpel

Received Wed, Jun 8, 2016 at 11:33 AM

Hello, I'm writing today to support the main proposed plan, as well as the addition of the preferred project alternative, which is the part of the plan that would research and implement fish passage improvement at the fish ladder at Island Fish Weir.

I feel like both aspects of this project are important for the health, use, and environment of the river and both will provide measurable impacts to the Raritan river watershed.

Thank you,

Angel Wurpel
Accounting Assistant
Accounting Department, Rutgers University Foundation Rutgers,
The State University of New Jersey

Scott Sillars

Received Wed, Jun 8, 2016 at 9:16 PM

Dear Mr. Alderson,

I am writing to express my strong support for the removal of the Weston Mill Dam and the associated restoration to river habitat and the improvement to the Island Farm Weir to enhance the ability for shad and other migratory fish to travel upstream.

This presents a unique opportunity to rectify damages to our natural environment, now that man has learned the mistakes of actions it took long ago. Undoubtedly we would not have allowed this dam to be built if we knew the consequences it would have on the shad population on the Raritan River.

Sincerely,
Scott Sillars
Princeton, NJ

Elizabeth Garvey

Received Wed, Jun 8, 2016 at 3:38 PM

Dear Mr. Alderson,

I am writing to express my support for the proposal to remove the Weston Mill Dam, restore river habitat, and improve the fish passage at the Island Farm Weir.

I believe these projects will be a major improvement for the health of our Jersey waterways and fish and wildlife; something we can all benefit from.

Thank you.
Kind regards, Elizabeth
Belle Mead, NJ

John Costello

Received Thu, Jun 9, 2016 at 6:06 AM

I hope the American Cyanamid restoration plan, including the removal of the Weston Mill Dam on the Millstone River proceeds. This would be a step in the right direction for the river.

Thanks -
John Costello
Wall, NJ

Judith Papiez

Received Thu, Jun 9, 2016 at 7:55 AM

Eight years ago the Watershed launched an effort to remove two old dams from the Millstone River in order to restore American shad, striped bass, herring and other migratory fish to our namesake river. They completed feasibility studies and hydrologic analyses, secured a number of required permits and advocated with NJDEP and others to make this a priority.

Last month, the National Oceanic and Atmospheric Administration Fisheries Division (NOAA Fisheries), in coordination with the US Fish and Wildlife Service and NJ Department of Environmental Protection released a draft restoration plan and Environmental Assessment on the proposal to remove the Weston Mill Dam in Manville.

The plan also calls for improvement to the passage of fish by the Island Farm Weir, which currently contains a "fish ladder" that allows some fish to migrate past that structure. The proposal is to be funded by a private party which is required to compensate the state for past damages to natural resources under the Superfund law.

I support for the proposal to remove the Weston Mill Dam, restore river habitat, and improve fish passage at the Island Farm Weir. We are in favor of its complete removal to restore fish and eliminate a dangerous situation for recreational users of the river. Please help by endorsing the proposal.

Thank you

Tom Kreutz

Received Thu, Jun 9, 2016 at 1:06 PM

Dear Mr. Alderson,
As a kayaker, outdoorsperson and ardent environmentalist, I'm writing to express my strong support for the proposed removal of the Weston Mill Dam and facilitation of the fish passage at the Island Farm Weir, activities that which would help restore the watershed to its original state.

Best regards, Tom Kreutz
Senior Technical Staff Member
Andlinger Center for Energy and the
Environment Princeton University

Brenda Cummings

Received Thu, Jun 9, 2016 at 1:35 PM

Dear Mr. Alderson,

I am writing to let you know that I am an enthusiastic supporter of the plan to remove the Weston Mill Dam so that river habitat and fish passage can be restored. This sounds like a great way to begin bringing back American shad, striped bass, herring and other migratory native fish to the Millstone River.

Sincerely,
Brenda Cummings.
Closter, NJ

Jens Riedel

Received Thu, Jun 9, 2016 at 1:36 PM

Dear Mr. Alderson,

Dear Mr. Alderson:

On behalf of the Central Jersey Stream Team (CJST), I am writing you today in support of the proposed Restoration Plan/Environmental Assessment for the American Cyanamid Co. Superfund Site in Bridgewater Township, New Jersey.

The Central Jersey Stream Team is a 501(c)3 nonprofit organization in New Jersey focusing on trash and debris cleanups in the Raritan River and its tributaries since 2013. The group also supports dam removals, ecological restoration, recreational access, and historical and natural site protection within the watershed so we have great interest in the proposed project. Since 2013, we have cleaned close to 40 miles of waterways and removed over 3,500 tires and tons of other trash from the watershed.

CJST supports the full removal of the Weston Mill Dam to restore fish passage upstream, to improve the ecological function of the waterway, and to enhance recreational use of this section of the Millstone River. In addition, the overall construction of this dam and its present deteriorating condition create a safety hazard which should be eliminated. It is only a matter of time before this dam begins to undermine and removing itself, potentially damaging the remaining mill foundations.

CJST values the historical importance of the site during the Revolutionary War but feels that the dam itself has been altered to such an extent since that time that it is no longer necessary for the interpretation of this historic resource. We agree with the plan to sever the connection between the dam and the mill foundations and remove the dam entirely. We also agree with the plan's course of action to stabilize the mill foundations and install interpretive signage that will display the dam and mill's importance to the history of the area.

The plan does not provide much detail on the Island Farm Fish Weir (IFW) Fish Passage Re- Design Component. CJST would like the feasibility analysis for this portion of the project to also include the option of full IFW removal including the evaluation of alternate designs for the water intakes to the New

Jersey American Water Company that do not require a full blockage of the river. This will greatly improve fish passage, eliminate a hazard to recreational use, improve the upstream ecological conditions of the river, and reduce the risk of flooding. Removal of this first barrier going upstream will significantly improve the conditions in the Raritan and Millstone Rivers.

Finally, as stated earlier, the Central Jersey Stream Team's primary focus is on organizing cleanups to remove trash such as tires and other debris from the waterways to improve both the aesthetics and water quality and to raise the appreciation of these waterways in the local communities. Our group would be willing to work with the Trustees of this project to arrange for a cleanup of the Millstone River upstream of the dam site once dam removal is completed.

There is no doubt that the dam and the sediments behind it have collected significant quantities of trash over the years and we would like to play our part in remediating this situation and contributing to the full restoration of this section of river.

On a personal note, as a professional engineer in New Jersey and an avid recreational user of the Raritan and Millstone Rivers, I completely support the removal of the Weston Mill Dam and the evaluation of the Island Farm Weir Fish Passage improvements.

Please contact me if you would like to discuss our response further.

Sincerely,

Jens Riedel, P.E.
Vice President - Central Jersey Stream Team

Patty Cronheim

Thu, Jun 9, 2016 at 2:33 PM
Dear Mr. Alderson,

I'm writing to encourage the DEP to remove the Weston Mill Dam and help restore the waterways of the Millstone River. The improved and continued health of NJ's waterways and ecohabitats is a critical issue that requires us, in part, to remove the mistakes of the past. I sincerely hope that the NOAA and the DEP see fit to allow the correction of these easily rectified problems and permit the removal of the Weston Mill Dam.

Best,

Patty Cronheim
Pennington NJ

Michael Catania

Received Thu, Jun 9, 2016 at 5:18 PM

Carl –

Please accept these comments on behalf of Duke Farms with respect to the proposed removal of the Weston Mill Dam and the Island Weir.

As you know, Duke Farms has worked closely with your agency, NJDEP, and the parties who have funded previous dam removals in the Raritan watershed. We believe strongly that these removals are essential to restoring the natural ecological functioning of these rivers, as well as opening up these waterways as habitat for anadromous fisheries. In addition, these projects also help restore safe public access to waterways, enhance recreational opportunities including fishing, birding, canoeing and kayaking, thus facilitating ecotourism, while also supporting local economies, and transforming these rivers into genuine resources to the communities along their banks.

Dam removal has been proven to be an effective way of achieving all of these benefits in a truly cost effective fashion. The technology exists to do this in a way which minimizes any short term environmental impact while maximizing the multiple long term environmental benefits.

From a cost benefit analysis, these restoration projects are a genuine bargain which return many dollars for each dollar invested in restoration. And in this specific situation, to have potentially responsible parties cover the cost of these publically beneficial projects represents an incredible opportunity which must not be wasted. In fact, I would have to say that if regulatory agencies are looking for an appropriate way to compensate the public for past environmental damages to these rivers, as well as the loss of use of these significant resources, I can think of no better form of public compensation than these restoration projects.

I trust that these brief comments will be helpful, and please do not hesitate to contact me if you have any questions or if I can be of any further assistance.

Thank you in advance for your consideration of these comments.

Michael Catania
Executive Director Duke Farms CA

Greg Remaud

Received Thu, Jun 9, 2016 at 5:55 PM

NY/NJ Baykeeper wholeheartedly supports offsetting environmental damages through the mitigation consisting of extending the existing fish run along the Raritan River by removing the Weston Mill Dam which impedes fish migration. This dam removal will be the fourth in an extraordinary series of fish impediment removals on the lower Raritan River that have contributed tremendous ecological benefits to one of New Jersey's great Rivers.

As you're aware, Baykeeper has long advocated for restoring traditional fish passages on the Raritan River for Anadromous and other migratory fish that have historically used this waterway. The restoration research and insights from your office, David Bean at the State of New Jersey in conjunction with consultant John have resulted in a thorough, thoughtful and technically sound plan to accomplish this notable objective. In removing the Calco Nivius and Roberts Street dams along with the Manville weir natural resource agencies have returned several miles of historic fish habitat, spawning and feeding areas to migratory fish who were cut off from these benefits for several generations. In so doing embarked one of the more ecologically beneficial restoration projects in the region.

This high profile environmental project will have significant ecological benefits to the Raritan River and the larger Hudson Raritan Estuary region. Water quality on a stretch of the Raritan River and portions of the Millstone River, a major tributary, will be improved by a removal of barriers that accumulate sediments and pollutants and through the filtering associated with a free flowing hydrologic system.

In 1991 Baykeeper conducted a study of "Impediments to the Spawning Success of Anadromous Fish in Tributaries of the NY/NJ Harbor Watershed. Included in this study was a study of blockages along the lower Raritan River, just below the stretch of River where the mitigation is proposed. The study shows that historically, anadromous fish (i.e. fish that move from salt to freshwater to spawn, such as herring and shad) spawning runs were common in the Harbor Estuary and their populations have decreased due to poor stream conditions, including obstacles to migration.

Anadromous fish are still found in New Jersey streams struggling to traditional habitat areas until their runs are blocked. This project provides the opportunity to remove blockages and extend fish runs. Furthermore, it would help anadromous juveniles return to being an important foraging species for larger fish in the area, and their contribution would enhance larger New Jersey fisheries.

Beyond these far reaching ecological benefits is the prospect of this inspirational project serving as a catalyst for improvements throughout the length of the Raritan River, and both the ecological and economic restoration of the critically important lower Raritan River.

We look forward to assisting this project in any way possible should it be permitted to move forward. Thank you for your consideration.

Sincerely,
Gregory A. Remaud
Deputy Director NY/NJ Baykeeper

Jim Waltman

Received Fri, Jun 10, 2016 at 7:57 AM

Jim Waltman Executive Director
Stony Brook-Millstone Watershed Association
Pennington, NJ

I am writing on behalf of the Stony Brook-Millstone Watershed Association (the Watershed Association)

to indicate our strong support of the draft Restoration Plan/Environmental Assessment for the American Cyanamid Superfund Site, Bridgewater Township, Somerset County, New Jersey. Since 1949, the Watershed Association has worked to keep water clean, safe and healthy in the Millstone River Watershed through conservation, advocacy science and education.

We support the proposed alternative to remove the Weston Mill Dam and modify the Island Farm Weir, actions that would help restore migratory runs of several diadromous fish species to the Millstone River, improve water quality, remove a serious hazard to recreational boating, and protect the remains of the historic Weston Mill. The proposed action is appropriate as compensatory restoration for the damages to natural resources caused by contamination from the Cyanamid site and quantified by the natural resource Trustees. Such restoration is required because remedial cleanup of the Cyanamid site is not expected to adequately address the losses to natural resources caused by the sites contamination.

I. Restoration Plan would help restore migratory fish

Large populations of migratory fish are thought to have once been present in the Millstone and Raritan Rivers. Johann David Schoepf, an 18th century German botanist, zoologist and physician who traveled extensively in North America, visited the Raritan and Millstone Rivers in 1783-84. During his excursion, he was told about the loss of once-great Millstone River shad runs that had already taken place by that time as a result of dam construction. "These waters contain a multitude of fish, pike, gold-fish, and suckers," he wrote. "Formerly shad also, in numberless schools, came high up this river; but dams, of which many have been built in recent years, keep back the shad..." (Schoepf 1783-1784).

Dams constructed in the 18th and 19th centuries blocked access of a number of migratory fish species to historic spawning, rearing and migratory habitat in the Millstone and Raritan Rivers. In addition to American shad, affected species include alewife, blueback herring, striped bass, and American eel. The near extirpation of these species from these rivers impacted many other species of fish and wildlife that preyed upon or were preyed on by these fish.

The Raritan River Fish Passage Initiative was launched by federal and state agencies and non-profit conservation organizations in 2008 to identify and implement strategies to restore these diadromous species to the Raritan and Millstone River. Since then, the Calco, Nevius Street and Robert Street dams have been removed and a number of feasibility studies and other investigations have evaluated other structures that block fish passage in the rivers.

Removal of the Weston Mill Dam is part of a comprehensive strategy to restore migratory fish to the middle and upper reaches of the Raritan River Basin, the largest watershed located entirely within the state of New Jersey. Increases in populations of the targeted fish species will also provide additional prey for larger commercial fish in Raritan Bay and the Atlantic Ocean.

Removal of the Weston Mill Dam and other blockages to fish passage in the Millstone and Raritan Rivers is therefore a regional and state-wide conservation priority.

II. Restoration Plan would help improve water quality

Water quality is impacted by low-head dams through the alteration of natural lotic habitats. Water flow is one of the most significant indicators of a river's ecological health (Power 1995). Blocking a river's flow with artificial structures and impoundments, therefore, has a direct impact on the ecology of the adjacent stream. The river channel behind a dam is deeper and wider than a free flowing river, filling in with riparian sediment as the shoreline erodes (Baxter 1977). Sediment transport is blocked, causing additional sediment to settle behind the dam and benthic habitat is often smothered by this influx of sediment. Aquatic microhabitats are then homogenized into one deep muddy pool, affecting the populations of benthic macroinvertebrate species that are adapted to lotic conditions. Not only do these alterations in aquatic habitat impact benthic macroinvertebrates for whom the stream bottom is home, but also higher order species that prey on these organisms.

Impounding a free-flowing stream also causes water temperature to increase. Dissolved oxygen levels, correlated strongly with temperature, will then typically decrease. Results of water quality monitoring in the Millstone River by Watershed Association staff have reflected this trend.

Dissolved oxygen levels were consistently lower in the impounded segment of the river than in samples measured downstream of the dam during the summer months. In addition, diurnal fluctuations in dissolved oxygen are often more extreme in impounded stream segments (Santucci, et al 2005).

Removal of the Weston Mill Dam would restore this section of the Millstone River to a more natural hydrology and flow regime, and help address a number of water quality impairments that are at least partially caused by the dam.

III. Restoration Plan would remove a safety hazard for recreational boaters

Removal of the Weston Mill Dam, as proposed in the Restoration Plan and Environmental Assessment would also eliminate a dangerous condition for recreational boaters in the Millstone River. Low-head dams like this one create a hydraulic backwash current that can be nearly impossible for people or animals to escape. The hydraulic condition created at the downstream toe can create "boils," which are situations where water from below the surface moves back towards the dam in a circular motion.

These boils can trap recreationists particularly because the dams themselves often appear non-threatening from the surface. Similar low-head dams in the state and region have resulted in deaths and injuries. More than 200 deaths from around the country have been reported from this hazard (Kern 2012).

IV. Restoration Plan would help preserve the historic remains of the Weston Mill

The original dam at the Weston Mill was thought to have been constructed around 1740. While the remnant foundation of the mill is thought to have historic attributes deserving of preservation, the dam itself is thought to have been replaced several times, most recently with a concrete structure.

The dam is starting to gradually deteriorate and as it does so, may be pulling the historic mill foundation down into the river. To preserve the remnants of the historic mill site, the Restoration Plan calls for the mill's foundation to be severed from the dam. Based on our personal observation of the structure, we concur that severing the mill's foundation from the dam and then removing the dam would help preserve the remains of the historic mill.

V. Additional Comments

We understand that Rutgers University Professor Olaf Jensen is conducting research on the effectiveness of the fish ladder at the Island Farm Weir to facilitate the passage of fish at that structure. We understand that his preliminary results indicate that the fish ladder is not very effective in serving the purpose for which it was constructed. The value of including "design and feasibility analysis of fish passage improvement at the Island Farm Weir" would be far clearer if these preliminary results were included in the final document.

The draft Plan suggests that potential impacts to freshwater mussels from short-term increases in turbidity during dam removal could be mitigated by relocating any mussels present in the area away from the impoundment prior to construction and returning mussels to the site after it has been stabilized. We concur and recommend that this practice be a required protocol.

Thank you for this opportunity to comment on the proposed Restoration Plan and Environmental Assessment. We strongly support the Proposed Preferred Alternative.

Sincerely,
Jim Waltman Executive

Director

laura hanson

Received Fri, Jun 10, 2016 at 9:45 AM

Dear Mr. Alderson,

I am resident of Pennington, NJ in Mercer County and am writing to register my support of removal of two dams on the Millstone River. The dam removals are an important step to restore striped bass, herring and other migratory fish in the river. Please approve this measure to restore river habitat and improve fish passage at the Island Farm Weir.

Best,
Laura Hanson

John Toth

Received Fri, Jun 10, 2016 at 11:44 AM

Mr. Alderson,
Attached is the Jersey Coast Anglers Association' comments on this subject

Dear Mr. Alderson,

I am writing to you on behalf of the 70 member organizations of The Jersey Coast Anglers Association. Thousands of our members fish the Raritan river and Raritan bay for Striped Bass, Summer Flounder, Bluefish and Weakfish. Improving the quality of this specific inland habitat will certainly have a positive impact in the immediate areas of the project, but we are also very excited about the potential positive *downstream* impacts of all phases of this project.

Decontaminating upstream waters could ensure that migrating forage species like Alewife & Blueback Herring, American eel and others that our gamefish rely upon would have less bio accumulation of toxins and heavy metals inside them. Making sure that the gamefish and crabs that New Jersey and New York anglers ultimately eat downstream are not carcinogenic is our utmost concern.

The proposed removal of the Weston Mill Dam on the Millstone River would open up nearly 5 miles of critical habitat and increase vital upstream spawning areas for the many anadromous species in our waters. This in turn, would build fish stocks and make sure that our waters are abundant with gamefish and migrating forage species.

Now that three other dams have been removed on the main stem of the Raritan River (two upstream and one downstream of this site), the Island Farms-Weir remains as the sole impediment to fish migration in lower 30 miles of the Raritan River. Yes, there is currently a marginally effective fish ladder that a ton of money was spent on, yes, you could leave it there but please add better access as it desperately needs to be improved so that more fish can make it more efficiently beyond this obstacle.

Improving fish passage at the Island Farm Weir on the Raritan River is imperative and it does not need to be an expensive fix. By merely lowering a section in the center of the current weir and replacing it with a "rock ramp" thousands more stripers, shad, river herring and eels could make it up an over and continue upstream to spawning areas that they prefer. We fully support this proposed effort and hope that you are able to complete all the restoration work/dam removal project/Dam studies as specified.

Thank you for your consideration,

John Toth
President
Monroe Township, NJ

Viera, Elvia

Received Fri, Jun 10, 2016 at 12:28 PM

Dear Mr. Alderson,

Please see the attached letter regarding a restoration plan/environmental assessment for the American Cyanamid Superfund Site, Bridgewater Township, Somerset County, NJ.

One has been sent in the mail, this electronic copy is for your records.

Best, Elvia
Elvia Viera Legislative Aide
Assemblyman Jack M. Ciattarelli Legislative District 16
Somerville, NJ

Dear Mr. Alderson,

I strongly support the proposal to remove the Weston Mill Dam and modify the Island Farm Weir so as to promote the restoration actions proposed in the Draft Restoration Plan/Environmental Assessment for the American Cyanamid Superfund Site, Bridgewater Township, Somerset County. I understand that these actions are to be required in addition to, and not in lieu of, the remediation of contamination at the Cyanamid site.

Populations of American shad, blueback herring, alewife and striped bass are depressed from a variety of factors, including physical blockage by dams from significant areas within their historic spawning areas. Removing dams and other blockages to migration routes is an important component of a long-term strategy to restore these fisheries. Historically the Raritan and Millstone Rivers harbored great numbers of these fish but migrations were largely extinguished by dams on these rivers. Fortunately, three dams have been removed from the Raritan River over that past several years and this proposal would advance these important efforts.

In addition, I understand that low-head dams like the Weston Mill Dam pose a serious hazard to recreational boaters and anglers due to the backwash current created downstream from these structures.

Finally, I understand that, while a dam was first constructed at the location of Weston Mill in the 18th century, the current dam was constructed much more recently. In fact, I understand that the best way to preserve the truly historic remains of the adjacent Weston Mill is to remove the dam, which is crumbling into the river and may be pulling to Mill's remains into the river.

Sincerely,
Assemblyman Jack M. Ciattarelli Legislative District 16
Somerville, NJ

Amy Soli

Received Fri, Jun 10, 2016 at 1:28 PM

Carl,

I am writing to you about the proposed removal of the Weston Causeway Dam proposed as a component of the restoration and mitigation for the *American Cyanamid Co. Superfund Site in Bridgewater Township, New Jersey*.

As you know, during my 5 years at the Stony Brook-Millstone Watershed Association, I was dedicated to, and working towards, the removal of dams on the Millstone River. While I had to leave the Watershed Association and move to IL for family reasons, I am still deeply committed to this initiative and I continue to hope to see removal of dams on the Millstone River move forward.

Dams have blocked fish passage on the Millstone River since before the American Revolution. The original Blackwells Mills dam was built around 1746 and dam(s) (the most recent on being constructed by the USGS ~ 1930) still exist in the same location. A mill and dam were also constructed at/near the site of the current Weston Causeway Dam and was the site of a skirmish during the American Revolution (when American soldiers fought off British troops that were raiding the mill for supplies). While the Raritan River has had numerous dams built along it (and recently, the celebrated removal of the Calco, Nevius, and Roberts Street Dams), the Millstone River has been assaulted for a longer period of time in terms of the effects of damming on the aquatic community and migratory fish habitats.

The effects of dams on aquatic communities, especially migratory fish populations (and to some extent resident fish populations) have been well documented. Numerous studies have demonstrated correlations between decreases in migratory fish populations and decreases in their access to breeding grounds.

Removal of the Weston Causeway Dam will restore fish passage in the Millstone River up to the Blackwells Mills Dam (which can hopefully be removed in the near future) and will provide several additional miles of riverine habitat in the Millstone River and its tributaries for migratory fish breeding. This will help with repopulation of not only the Millstone and Raritan Rivers with anadromous fish, but also the Raritan Bay and Atlantic Ocean, where these fish are important prey for larger/commercial fish.

Removal of the dam will have benefits other than restoration of anadromous fish habitats.

First, removal of the dam will restore a free-flowing river in the section that is currently impounded because of the dam. I have personally seen an overabundance of algae and aquatic plants in the impounded section, especially during summer, and these conditions have a negative impact on the water and habitat quality of the river. A free-flowing river generally has better water quality and improved and more varied habitat for aquatic organisms.

Second, the removal of the dam can benefit resident fish by providing upstream and downstream access to waters, likely including shaded tributaries, which can have cooler habitats and protect against fish kills.

Third, a free-flowing river can protect the river system from the potential future impacts of global climate change. A flowing river typically has more dissolved oxygen than an impoundment. Higher baseline dissolved oxygen levels can help mitigate against decreases in dissolved oxygen that can result from

higher water temperatures from global climate change.

Forth, studies have shown that improved fisheries are economically beneficial for towns in the area of a river restoration project. Additional revenue to towns along the Millstone River would almost certainly be considered beneficial to these communities.

Finally, I have not heard about any deaths from/at the Blackwells Mills Dam but have heard that someone has died at Weston Causeway. I am not positive that no one has or has not been killed from either of these dams due to the fact that records of such things were not always kept or publicly available. However, it would be wonderful to have the potential for a tragedy on the river because of a dam, especially at Weston Causeway Dam (where people boat up to and stand on the dam), completely eliminated through removal of the dam. Dams are dangerous to boaters, kayakers, and others that recreate on the river. Protection of the health and safety of residents and visitors that use the River is paramount and as good of a reason for dam removal (if not better) as is restoration of anadromous fish passage.

Thank you for your consideration of your comments regarding removal of Weston Causeway Dam as a component of the restoration and mitigation for the American Cyanamid Co. Superfund Site in Bridgewater Township, New Jersey.

I look forward to hearing about the acceptance of the proposed American Cyanamid Co. Superfund Site settlement and the forward movement of the removal of the Weston Causeway Dam.

Amy M. Soli, PhD

Paul Briggs

Received Fri, Jun 10, 2016 at 2:45 PM

Dear Mr. Anderson,

I am a resident of Pennington and whole heartedly support the proposal to remove the Weston Mill Dam and improve the fish passage at Island Farm Weir to assist in the recovery of the shad population and other migratory fish. I have reviewed the proposal and believe it to be a reasonable step in preserving our natural resources in New Jersey.

Thank you for your consideration and the work that you do on our behalf. Sincerely yours,

Paul Briggs
Pennington, NJ

Alex Soudah

Received Fri, Jun 10, 2016 at 2:43 PM

Dear Mr. Alderson,

I wanted to write to you to voice my support for the implementation of the Restoration Plan/Environmental Assessment proposal as prepared by the National Oceanic and Atmospheric Administration.

Many of the citizens of the State of New Jersey have already seen the environmental benefits of removing several dams in the Raritan River and I hope that this proposal will be

supported and implemented so more dams can be removed on the Millstone River as well, specifically the Weston Mill and Blackwells Mills dams. I also feel that the conditions at the Island Farm Weir must be improved as well to promote increased fish passage.

Please consider supporting this proposal so we can restore river habitat and improve fish passage. I am confident that the actions outlined in this proposal will lead to enormous benefits for generations to come. Thank you.

Best Regards, Alex E. Soudah

Judy Shaw

Received Fri, Jun 10, 2016 at 3:10 PM

Dear Carl,

Please find attached my letter of public comment on the American Cyanamid site. My thanks to NOAA and the other trustees for their service in drafting the restoration plan.

I write in support of the draft restoration plan for the American Cyanamid site in Bridgewater, New Jersey. I believe that the work described, including the removal of the Weston Mill Dam on the Millstone River, and plans to improve fish passage at the Island Farm Weir will lead to significant improvements to water quality of the Raritan River and the aquatic and local wildlife it supports. It will also significantly enhance the quality of life for those who live in the adjacent communities as they will once again enjoy the resource as part of their lives.

As noted in the draft plan, the compensation for lost services is critically important to the region's wildlife and to the residents who have lived with a damaged resource for so many years. The removal of the Weston Mill Dam will be a significant step in that direction as it will increase the base-flow of the river.

The restoration of both the surface water and the sediment is critical to both the long-term health of the immediate region and the overall river. The long-term monitoring of this site is key to the overall success of the restoration, making the commitment of the natural resource trustees a critical element.

While serving as the director of the Sustainable Raritan River Initiative (SRRI) at Rutgers University for the past seven years, I was closely involved with the project. While involved, I found the trustees to be highly competent as was the team from the new owners, Pfizer. As a matter of disclosure, please note Pfizer has actively recognized the value of the SRRI and has contributed financially to its ongoing role as the coordinating entity for the region's 98 municipalities in the watershed. I also worked closely with John Jengo, principal geologist with MWH Americas, who oversaw the negotiations and removal for the three dams removed in recent years. I have also worked closely with many other interested parties, and with municipal officials from the three municipalities adjacent to the West Mills Dam.

I retired from the University in December 2015 and have relocated to Ohio where I expect to continue to be involved in restoration activities as they affect the quality of the ecosystems in this region. It has been a pleasure to learn through my involvement in this project. I wish you all the success.

Sincerely,

Judith A. Shaw, Ph.D., AICP
Kent, Ohio

Judy Shaw

Received Fri, Jun 10, 2016 at 3:10 PM

The overall proposal for the remediation plan adequately meets the requirement to address natural resource injuries and service losses in the region of the American Cyanamid site. It is clear that there will be some short-term impacts, but the role of the Trustees in overseeing the operation will offer significant assurances that all possible protections are in place. It is also critical that the NJDEP act in a way that both honors its rules and regulations while ensuring that modifications are acceptable in order to meet the conditions needed for long-term value. In particular, it has been noted in the past that NJDEP inadvertently limits successful dam removal through adamant adherence to conditions of stream banks during the construction phase.

With the commitment as described to restoring the ecology with native and other species, flexibility must be possible.

The removal of other dams in the region have already demonstrated the benefit to the fishery and the overall wildlife of the area. Fish and bird species that were previously present in small numbers are rebounding.

The study of means to improve the capacity of the Island Farm Weir is also hugely important to addressing the natural resource injuries. It is clear that improvements in technology would enhance the function of the fish ladder to the overall benefit of the resource and the ecological services of the region.

One of the key public benefits to work done through the Trustees would be an assurance in the Restoration Plan/Environmental Assessment (RP/EA) that information will be provided to the public online and that members of the public are able to sign up for notification of any updates. It will build goodwill if there is adequate communication with the community in advance of the work so they both see the Trustees and know what to expect in terms of timelines, possible barriers to the procedure that may come up and delay progress.

In all, the RP/EA is sound, practical, sensible and highly beneficial to the physical, historical and cultural aspects of the region.

Forte, Joseph

Received Fri, Jun 10, 2016 at 4:18 PM

Dear Mr. Alderson,

On behalf of Assemblyman Zwicker, attached is a support letter in favor of removing the Weston Mill Dam and modify the Island Farm Weir so as to promote the restoration actions proposed in the Draft Restoration Plan/Environmental Assessment for the American Cyanamid Superfund Site, Bridgewater Township, Somerset County.

I strongly support the proposal to remove the Weston Mill Dam and modify the Island Farm Weir so as to promote the restoration actions proposed in the Draft Restoration Plan/Environmental Assessment for the American Cyanamid Superfund Site, Bridgewater Township, Somerset County. I understand that these actions are to be required in addition to,

and not in lieu of, the remediation of contamination at the Cyanamid site.

Populations of American shad, blueback herring, alewife and striped bass are depressed from a variety of factors, including physical blockage by dams from significant areas within their historic spawning areas. Removing dams and other blockages to migration routes is an important component of a long-term strategy to restore these fisheries. Historically the Raritan and Millstone Rivers harbored great numbers of these fish but migrations were largely extinguished by dams on these rivers. Fortunately, three dams have been removed from the Raritan River over the past several years and this proposal would advance these important efforts.

In addition, I understand that low-head dams like the Weston Mill Dam pose a serious hazard to recreational boaters and anglers due to the backwash current created downstream from these structures.

Finally, I understand that while a dam was first constructed at the location of Weston Mill in the 18th century, the current dam was constructed much more recently. In fact, I understand that the best way to preserve the truly historic remains of the adjacent Weston Mill is to remove the dam, which is crumbling into the river and may be pulling the Mill's remains into the river.

Sincerely yours,
Andrew Zwicker Assemblyman, 16th
District

If you have any questions, please feel free to reach out to my office at [732-713-3716](tel:732-713-3716) or by email.

Thank you,

Joe Forte Chief of Staff
Office of Assemblyman Andrew Zwicker 16th Legislative District
23 Orchard Road, Suite 170
Skillman, NJ
June 9, 2016

Winifred Hughes Spar

Received Fri, Jun 10, 2016 at 4:42 PM

Dear Mr. Alderson,

We support removal of the Weston Mill Dam in Manville, restoration of river habitat, and improvement of fish passage at Island Farm Weir. Thank you for your attention to this matter.

Sincerely,

Winifred and Fred Spar

Winifred Hughes Spar winifred.spar@gmail.com

Dianne Thompson

Received Fri, Jun 10, 2016 at 4:54 PM

Mr. Alderson,

Based on the studies of the US Fish and Wildlife Service and the NJ DEP, please remove

the Weston Mill Dam in Manville and improved the passage of fish by the Island Farm Weir. This is a chance to put things closer to what nature intended--and it will work BETTER than we have been able to do.

Migratory fish in the Millstone River deserve to have their habitat restored! Dianne Thompson, Red Bank, NJ

Katherine V. Dresdner

Received Fri, Jun 10, 2016 at 9:21 PM

Dear Mr. Alderson,

On behalf of the Hopewell Valley Citizens Group, Inc., (HVCG), an environmental advocacy organization located in central New Jersey, please accept the following public comment. HVCG mission includes advocacy to protect surface waters and restore habitats. HVCG's counsel recently led a regional government, private and NGO partnership saving over 320 acres for a new public park called the Mt. Rose Preserve, protecting two C1 streams, and providing land for the northern loop of Lawrence Hopewell Trail, a 30 mile regional pedestrian and bicycle trail.

The Weston Mill Dam:

HVCG joins in the science based position of the Stony Brook Millstone Watershed Association in support of NOAA Fisheries's proposal and the EA for the removal of the Weston Mill Dam from the Millstone River in Manville. Removal of the Weston Mill Dam from the Millstone River is a crucial step toward restoration of migratory freshwater species in the Millstone River.

We also support NOAA Fisheries 's plan to improve the fish ladder at the Island Farm Weir. Improving this fish ladder will help the American shad, the striped bass, the herring and other migratory fish to migrate successfully past the weir structure in the Millstone River.

HVCG thanks the Stony Brook Millstone Watershed Assoc., the NOAA Fisheries, and the NJDEP for all the work involved in planning for removal of the Westin Mill Dam in Manville. This will restore Millstone River habitat and bring migratory fish back to this river.

Sincerely,
Katherine V.Dresdner
Dresdner, Esq.
General Counsel
HVCG

Capt. Paul Eidman

Received Tue, Jun 14, 2016 at 10:16 PM

Dear Mr. Alderson-

I am writing to you on behalf of the 2,000+ members of the Anglers Conservation Network. Many of our member's fish the Raritan River as well as Raritan and Sandy Hook bay for Striped Bass, Summer Flounder, Bluefish and weakfish. Improving the quality of this specific inland habitat will certainly have a positive impact in the immediate areas of the project, but know that we are also very excited about the potential positive *downstream* impacts of all phases of this project.

Decontaminating upstream waters could ensure that migrating forage species like Alewife & blueback herring, American eel and others that our gamefish rely upon have less bio accumulation of toxins and heavy metals inside them. Making sure that the gamefish and crabs that New Jersey and New York anglers ultimately eat downstream are not carcinogenic is our utmost concern.

The proposed removal of the Weston Mill Dam on the Millstone River would open up nearly 5 miles of critical habitat and increase vital upstream spawning areas for the many anadromous species in our waters. This in turn, would build fish stocks and make sure that our waters are abundant with gamefish and migrating forage species.

Now that 3 other dams have been removed on the main stem of the Raritan River (two upstream and one downstream of this site), the Island Farms Weir remains as the sole impediment to fish migration in lower 30 miles of the Raritan River. Yes, there is currently a marginally effective fish ladder that a ton of money was spent on, yes, you could leave it there but please add better egress as it desperately needs to be improved so that more fish can make it more efficiently beyond this obstacle.

Improving fish passage at the Island Farm Weir on the Raritan River is imperative and does not need to be an expensive fix. By merely lowering a section in the center of the current weir and replacing it with a "rock ramp" thousands more stripers, shad, river herring and eels could make it up and continue upstream to spawning areas that they prefer. We fully support this proposed effort and hope that you are able to complete all the restoration work/dam removal project/Dam studies as specified.

Thank you for your consideration, Paul

Capt. Paul Eidman Director
Anglers Conservation Network Atlantic
Highlands, NJ

Subject: Historic Preservation of Weston Mill Dam/Historic Signage

Jan ten Broeke

Received Tue, May 17, 2016 at 11:06 AM

The Millstone Valley Preservation Coalition proposes notching of the Weston Dam to preserve parts of this very historic dam where the revolutionary war battle of Millstone took place on January 20, 1777.

The preserved parts should be lowered to pre 1930 level.

See: http://en.wikipedia.org/wiki/Battle_of_Millstone

Phil Kramer

Received Tue, May 17, 2016 at 11:51 AM

Returning it to the condition of the battle sounds great if practical. Sounds like we need a plaque as well.

Jens Riedel

Received Thu, Jun 9, 2016 at 1:36 PM

Dear Mr. Alderson,

CJST values the historical importance of the site during the Revolutionary War but feels that the dam itself has been altered to such an extent since that time that it is no longer necessary for the interpretation of this historic resource. We agree with the plan to sever the connection between the dam and the mill foundations and remove the dam entirely. We also agree with the plan's course of action to stabilize the mill foundations and install interpretive signage that will display the dam and mill's importance to the history of the area.

Subject: Island Farm Weir removal

Dr. O

Received Mon, May 30, 2016 at 6:43 PM

Why not propose to remove the Island Farm weir too? It's not natural and it was put into our waterway before we had serious flooding problems in Manville. I'm hopeful there's new technology to allow the water company to source its daily water needs without artificially raising both rivers by over one foot. Why debate its effects? Just remove it and look for an alternative solution. Thank you.

Jens Riedel

Received Thu, Jun 9, 2016 at 1:36 PM

Dear Mr. Alderson,

The plan does not provide much detail on the Island Farm Fish Weir (IFW) Fish Passage Re- Design Component. CJST would like the feasibility analysis for this portion of the project to also include the option of full IFW removal including the evaluation of alternate designs for the water intakes to the New Jersey American Water Company that do not require a full blockage of the river. This will greatly improve fish passage, eliminate a hazard to recreational use, improve the upstream ecological conditions of the river, and reduce the risk of flooding. Removal of this first barrier going upstream will significantly improve the conditions in the Raritan and Millstone Rivers.

Subject: Sediment Transport

Heather Fenyk, Ph.D., AICP/PP

Received Fri, May 27, 2016 at 6:07 PM

The LRWP's only concerns with NOAA's proposal are short term sediment transport impacts following dam removal. However, we are confident that NOAA's plan to reduce potential environmental consequences is sound and further expect that the proposed projects will provide long term restorative benefits to water chemistry, specifically decreased water temperatures in formerly impounded sections, and increased dissolved oxygen concentrations. These changes will benefit riverine biota from the most basic food chain level up to the top predators for many years to come.

Subject: Formal Request for an 60 day extension for public comment a Draft Restoration Plan and Environmental Assessment American Cyanamid Superfund Site

Robert Spiegel

Received Mon, Jun 6, 2016 at 9:08 PM

Dear Mr. Mehran and Mr. Alderson,

I am writing to formally request a 60 day extension of the public comment period on the Draft Restoration Plan and Environmental Assessment for the American Cyanamid Superfund Site. I am also requesting a public meeting with those who crafted the plan in order to better understand the process used to determine the proposed plan.

An extension must be granted in order for our technical experts to review the draft plan and extensive data regarding the American Cyanamid Superfund Site. This extension is requested so that the public can have meaningful public participation in this process.

Additionally, the public and stakeholders have not been significantly informed of this proposed plan and there must be more public outreach on this proposed plan so that all the stakeholders and members of the public are aware of the proposed plan and there is meaningful public participation in this process.

The Edison Wetlands Association has been working on the cleanup of the Raritan River for more than 25 years and were only made aware of this plan today. We request a 60 day extension and public hearing so our technical experts can review this proposed plan and assess its potential danger against its potential benefits due to the American Cyanamid Superfund Sites ongoing sediment contamination and various complexity of this site.

I can be reached at [732-841-9375](tel:732-841-9375) if you have any questions on this request. Please confirm you will grant the 60 day extension request so there can real and meaningful public participation.

Bill Wolfe

Received Mon, Jun 6, 2016 at 9:43 PM

Dear Mr. Mehran and Mr. Alderson,

I also request an extension of the public comment period in order to provide adequate time for meaningful review of the documents, which just recently came to my attention
Respectfully, Bill Wolfe

Subject: Insufficient Injury Compensation

Bill Wolfe

Received Thu, Jun 9, 2016 at 2:27 PM

Dear Mr. Alderson:

I have not had sufficient time to review the complete administrative record and all the technical documents.

I previously requested a 60 day extension of the public comment period. However, after speaking with your staff, I understand that that would push the project schedule past deadlines to meet a summer 2017 dam removal and lose a full year.

It is not my intent to delay the Restoration Plan. While I would not want that to happen, I reiterate my request to extend if it can be done in a way that can avoid losing a full year on this project.

Given insufficient time to review the documents, please accept cursory comments below.

After speaking with you staff, I understand the NOAA anticipates public notice of a proposed Settlement Agreement with the PRP regarding the full scope of all natural resource injuries and compensation/restoration requirements associated with the site (historic and prospective).

It is important that the public understand that the scope the Settlement Agreement is broader than the "in river" injuries addressed by the Restoration Plan's preferred alternative, dam removal.

This clarification should be done in press statements, in the text of the final Restoration Plan, and in formal response to public comments by NOAA.

The proposed compensatory restoration is limited in scope to "in river" injuries.

NOAA must provide explicit definition of the scope of all injuries and better define "in river injuries", as compared to the full scope of injuries and compensation/restoration obligations of the PRP.

NOAA must make it very clear to the public that the preferred alternative proposed dam removal - as compensatory restoration - is limited to "in river" injuries, which are just one small piece of the total natural resource damages and compensation/restoration the PRP is obligated for the site.

The RP/EA notes:

"Downstream estuarine areas provide critical spawning and nursery grounds for numerous marine organisms. Natural resource injuries are expected to continue until remedial actions and habitat recovery are complete." [ES-1]

The majority of the natural resource injuries resulting from releases from the site have been suffered by downstream ecosystems, riparian areas, estuaries, and riverfront communities. Those injuries are historic and ongoing.

It is important that the ongoing nature and broad scope of injuries be fully compensated for and fully understood by the public.

NOAA needs to clarify these issues so that the community does not form an inaccurate understanding that the proposed alternative (dam removal) satisfies 100% full restoration/compensation by the PRP.

The preferred alternative dam removal is located upstream from the site. Removal of the dam will provide a set of marginal fisheries, water quality, and ecological benefits. These benefits are not commensurate with the "in river" injuries or the full scope of injuries from the site.

The spatial and ecological distribution of these benefits in light of the injuries is problematic.

While the preferred alternative would provide small benefits a small distance both upstream and

downstream of the dam, the proposed alternative lacks an adequate spatial and technical nexus to downriver injuries.

Spatially, it appears the majority of the restoration benefits of the preferred alternative will not occur in downstream locations. Therefore, the preferred alternative does not provide adequate compensation, even for just "in river" injuries.

Technically, the projected water quality and habitat and fisheries benefits are not adequately linked to or commensurate with the "in river" injuries, particularly given the inability to quantify historic injuries or those associated with or masked by flood events.

Ongoing and future "in river" injuries appear to not have been fully considered, which is not possible in the absence of an approved site-wide remedial plan.

NOAA must provide supplemental compensatory restoration to fully compensate the public for "in river" injuries.

The scope of the EA appears to be site-wide. However, the scope of the natural resource injuries and compensatory restoration are limited to "in river" injuries.

This mismatch in scope is the source of confusion. It has a large potential to lead to false understandings and expectations by the public and the PRP.

I urge that these issues be clarified and communicate very clearly to the public.

I reserve additional comment pending review of the documents that form the basis for the proposed alternative and look forward to review of the proposed Settlement Agreement. Apologies for the cursory, conceptual, and inadequately supported comments. Respectfully,

Robert Spiegel

Received Fri, Jun 10, 2016 at 6:42 PM

Reyhan Mehran:

Sending back this response is unacceptable and sending it back one minute before the comment period is supposed to close is unreasonable and violates the public and due process requirements for NOAA and other trustees.

Today was the Raritan River Conference and I and my staff were in attendance and responding to the request one minute before the close of business today is unacceptable. Bill Wolfe from PEER also requested an extension due to inadequate time to review the application and merits of the proposed summit for the assessment on American Cyanamid Superfund Site.

These are the EWA's comments on the proposed plan.

This proposal is poor at best, socially unjust at worst. The legacy impacts are at the Cyanamid site and downstream, and they want to remove the Weston Dam nearly 2 miles upstream. *The impacts are downstream, in the lower income communities from South Bound Brook to New Brunswick and Edison, and they want to let a few fish swim through Hillsborough and the farmland of Franklin Townships.*

The plan allows fish to go upstream an extra 5 river miles, and then they hit the next obstruction at Blackwells Mills (priority barrier # 8, figure 4, page 4-9) in their DRAFT Restoration Assessment. Plus, and there are hardly any healthy tributaries in this stretch that would benefit fish spawning. Tributaries that come from Colonial Park, Royce Brook golf course, and Bunker Hill golf course are dammed and/or heavily polluted by farms and suburbia, and/or dry up in the cracked red shale of the Piedmont. Six-Mile Run might have some potential value for fish breeding, but it is upstream of the obstruction at Blackwell's Mills.

They don't propose to do any real (usually costly) ecological restoration of the polluted and degraded floodplain ecosystems downstream where the impact has occurred. How about restoration to re-create healthy, resilient riparian forest floodplain ecosystem in Johnson and Donaldson Parks? How about applying some real restoration ecology to restore the Raritan floodplain forest ecosystem.

This is a cheap cop-out, proposing to remove one little dam so that fish can swim to the next barrier without encountering any decent breeding habitat. Don't forget, much of the ecology of the Millstone River floodplain is severely impacted by the existence of the parallel D&R canal dikes that inhibit the movement of flood waters into what used to be a floodplain. In essence, the Millstone is somewhat heavily channelized in that stretch because of the existence of the D&R Canal.

The stretch from Rocky Hill to Blackwell's Mills has lots of legacy pollution that will impact the migratory fish your proposal purports to enhance. There is still an ongoing discharge from the American Cyanamid Superfund Site and other contaminated sites into the Raritan River. Removing these structures will release these contaminants into the Raritan River and creates more direct exposure to the biota of the Raritan River to the chemicals that continue to leach from the American Cyanamid Superfund Site and other contaminated sentiments that are being held back by these structures.

The 1000 members of the Edison Wetlands Association strongly oppose this project as NOAA and the other trustees are creating a bad project and rewarding American Cyanamid and Pfizer for their decades of inaction and pollution of the Raritan River while creating a direct path for biota to be harmed.

This project lets the responsible parties off the hook with an inexpensive project with little value.

Respectfully,

Robert Spiegel Executive Director
Edison Wetlands Association Phone: (732) 321-1300
Fax: (732) 372-7866
www.edisonwetlands.org

Subject: Insufficient Injury Compensation/Multiple Concerns

Thomas Gale

Received Fri, Jun 10, 2016 at 7:52 PM

Please find attached my comments on the draft proposal of May 2016. I apologize for sending this at the deadline but, as explained in the comments, I only just became aware of the document and comment period. Tom Gale

Unfortunately, by necessity, this is a hastily composed response to the DRAFT RESTORATION PLAN/ ENVIRONMENTAL ASSESSMENT (RP/EA) FOR THE AMERICAN CYANAMID CO. SUPERFUND SITE, BRIDGEWATER TOWNSHIP, SOMERSET COUNTY, NEW JERSEY, May 2016

as I only became aware of the public comment timeline this week through, of all things, a private Facebook group my wife is a member of. Since I am a member of the Franklin Township Historic Preservation Advisory Commission I know there is no record of the Commission being made aware of the proposal. Similarly, the Franklin Township website has no announcement of, or information on, the proposal. Even a Google search of Weston Dam is not very productive. As a first comment, I believe there should have been a much better notice of the draft proposal and the opportunity to respond.

I strongly support efforts to clean up the American Cyanamid Superfund Site. My first experience with the site was as a child traveling through the area. We quickly learned to hold our breath while traveling on the I-287 bridge over the Raritan if we didn't want to experience the truly offensive smell. Reading the reports of the environmental harm that was done over many years is very troubling. The list of heavy metals plus volatile, toxic, and carcinogenic chemicals in the ground and water is alarming. It seems that the harm will never fully be erased but I would like to see every effort possible be made to reversing the harm of the pollution. I don't see either project in the proposal in any way a solution to the pollutant problems with the site, however, so question their suggestion as remediation. If removing the dam would alleviate the Millstone Valley flooding problems I'd be all for it but my understanding is that removing that dam will have no effect on flooding.

Restoring migratory fish seems to be the primary benefit highlighted in the proposal. While restoring migratory fish to watersheds is a romantic idea that in general I support, in this location it seems overly romanticized. For one thing, there is the permanent obstruction of the Island Farm Weir. The draft proposal mentions that there is a fish ladder attached to the weir but implies that, by the draft's suggestion that a redesign should also be studied, the fish ladder is currently not working well. One could conclude that the Weston dam is not the only problem for migratory fish and the benefits of the dam's removal are dependent on the functionality of the weir fish ladder.

Below the weir, the migratory fish already have access to about 20 miles of the Raritan and multiple tributaries including the South River and its tributaries and, assuming they can navigate the weir's fish ladder, several more miles of the Raritan and several tributaries including Dukes Brook and Royce Brook above it. Removing the Weston Dam will only add a few more miles of the Millstone below the Blackwell's Mills Dam, an insignificant benefit it would seem to me.

I'm aware that earlier Blackwell's was also proposed to be removed but until Weston is removed or bypassed, its removal would not be a benefit to migratory fish. It should also be recognized that those two are not the only dams on the Millstone. A little farther upstream are the mill dam in Kingston and the Lake Carnegie Dam so there is a short, finite length of the Millstone that can be opened by removing dams.

I question whether there has been any research to insure there is still a suitable environment for the migratory fish in the Millstone and Upper Raritan. After all, the Millstone has had almost 300 years to adapt to a dammed stream ecosystem and, with Lake Carnegie upstream, even without Weston Dam, it will not be the same as it once was. We also shouldn't ignore how altered the watershed has become. Land use and runoff are very different and there is significant amount of pollution, both in the water and on the land nearby, including the American Cyanamid site. Is it really being fish friendly to introduce them into the current environment? What about the existing adapted Millstone River ecosystem, what will happen to it with the introduction of migratory fish, or doesn't that matter? I also question the wisdom of introducing migratory fish if there is the potential of the fish being contaminated by pollutants. It seems possible to advise the public that a local water body is contaminated so consumption of anything taken from it should be avoided but how can that be controlled if fish migrate? Also, what happens to the other environments they migrate to; will the fish introduce new pollutants somewhere else?

The draft mentions the existing side channel that bypasses the Weston Dam but the proposal has no discussion of using it as a natural fishway other than to say that removing dams tend to have more benefits. Still, if offering passage to migratory fish is the primary goal, using that side channel to develop a natural fishway would seem to be viable solution that should be given greater consideration.

The draft makes broad statements about the benefits of the Weston Dam's removal that don't seem to be supported in the document. It says the recreational opportunities for birding will be enhanced. Really? How? It says fishing opportunities will be improved as well. There are already fishing opportunities so other than the potential to catch different species, what will be enhanced? Might the dam offer fishing opportunities that will be lost if it were removed? If so, will the net change actually be positive or negative? The draft also talks about improved boating opportunities. Aren't there already boating opportunities that may actually be harmed if the river level drops and the channel narrows due to the removal of the dam? The draft mentions improved safety after the dam is removed but I know of only one event that made the news in the last thirty years so how unsafe is the dam really and might there not be other ways to improve safety other than with its removal? The draft has no supporting evidence that I can see.

The discussions about water temperature and dissolved oxygen also seem to be generalized without evidence that removing the dam will have a meaningful impact. With the shallow depth of the contained stream, I'd suspect that there will be little change in temperature and I would have to believe that the way the river spills over the dam actually improves the levels of dissolved oxygen.

I take the strongest objection with the draft's statement that "no short- or long-term adverse impacts on cultural, sociological or archaeological resources would be expected", however. That statement even seems to ignore information included in the proposal.

The draft sites excerpts from the Cultural Resource Assessment of the Weston Mill Dam completed in March 2011 (Hunter Research, 2011) that include:

The Weston Mill site includes the archaeological remains of a gristmill, sawmill, dam, and associated waterpower features. The mill seat was established circa 1740 and remained in operation until the mid-20th century. The mill is particularly well known in local history as the site of a Revolutionary War skirmish between British and American forces on January 21, 1777. The American forces drove off a British foraging party and captured a large quantity of supplies.

The mill site retains a strong above-ground expression. The dam although repaired with concrete in the early 20th century, appears to retain earlier masonry elements underneath the concrete. Remnants of the mill's foundation, turbine pit, metal turbine, and stone walls survive at the east end of the dam. The mill site is judged to have a high potential of yielding archaeological data significant to our understanding of milling practices, the evolution of the mill site, and the landscape at the time of the Revolutionary War skirmish. It has the potential to be eligible under Criterion D, and possibly Criterion A.

While the Revolutionary War skirmish, known as the Battle of Van Neste's Mill, is mentioned, it doesn't detail that a party of some 600 British had come from New Brunswick with the mill as their target and had set up cannon and other defenses to protect the raiding party. The NJ militia that responded from Somerset Courthouse (present day Millstone) chose to wade across the freezing Millstone below the Weston dam to defeat the British defenses. Though outnumbered, they managed to drive off the British and recovered a number of wagons, livestock and even a few prisoners. There are differing reports on the number of men lost but at least 25-30 British and 5 Americans lost their lives in the battle. I believe both the dam and mill site represent an important part of the history of New Jersey and the Nation that should be respected, protected, and preserved.

There is discussion about how the current condition of the dam is harming the mill foundation but it is not clear what is proposed for the mill foundation other than to sever its physical connection with the dam. The proposal also discusses deterioration of the dam. It seems to diminish its importance as a 1930s replacement that showed no evidence of an earlier structure through limited testing. I'd submit that dams deteriorate so it would be unlikely to find a 1740s dam in its original condition. A dam rebuilt 85 years ago in the historic location to support a historic mill still has relevance, in my opinion, and only the complete package of dam and mill, even if just the foundation, offers reverence to the culture and history of the site that goes back almost three centuries. I believe that as a package the site is significant historically, culturally, sociologically, and archeologically so strongly disagree with the statement in the report about the dam removal having no adverse impacts. For this reason I believe that the mill foundation should be preserved and protected but that the dam should also be preserved, with repairs if necessary.

I think it is a bit of a stretch to propose that restoring migratory fish to a short stretch of river in an area that has not seen them in almost 270 years compensates for significant chemical pollution that has occurred over the past 100 years or so. If that is the goal, though, then I think it first must be established that reintroducing them will be successful and more beneficial than harmful. If it is proven that there would be a benefit, I also believe that before any other action is undertaken, improving the ability of migratory fish to get past the island Farm Weir should be completed. Only after that should the thought of improving migratory fish access to the Millstone be considered and I strongly prefer the implementation of a natural fishway in the existing bypass channel over the removal of the Weston Dam and mill site which I feel has important historically, culturally, sociologically, and archeologically significance. To me, it would be ideal if the dam and mill site would be protected and preserved and even enhanced with improved access, safety, and information.

Sincerely,
Thomas Gale