

June 23, 2020 (sent by email)

Dear Sustainable Madison Committee:

Due to an important family event, I cannot participate in the SMC meeting tonight, so my comments about the Oscar Mayer Special Area Plan (OMSAP, Item #4) are below.

About one hundred and seventy years ago, in 1851, my great-great grandparents arrived in Madison with their five children (and one on the way--my great grandfather) after a long journey from northern England. Madison was a small town at that time, not yet incorporated as a city. Most Ho-Chunk Indians who had lived here for thousands of years had already been violently removed by our government, though some managed to remain and marginally survived--badly treated by European American settlers--on the outskirts of town. This was Madison's first environmental justice issue.

When my ancestors arrived here, they could drink from Madison's spring-fed lakes and eat any of the abundant fish without any fears of ingesting toxic chemicals. Within a few decades, sadly, due to our societal ignorance and government inactions, the lakes were filled with sewage. The city repeatedly treated the lakes with toxic chemicals attempting to eliminate algae, but these attempts proved unsuccessful. Toxic pesticide compounds still remain in our lakes' sediments to this day, where they slowly make their way into fish people eat.

In 1919, the Oscar Mayer meat factory began operations on the outskirts north of Madison on part what was a large wetland area. Eventually most of these wetlands were filled in, often with coal ash and garbage. Animals were raised and slaughtered onsite and animal wastes buried nearby. Because operations required lots of water and produced enormous quantities of wastes, the company sank many deep wells and built its own wastewater treatment facility. An onsite power plant burned coal and an incinerator burned solid materials.

Many of these industrial operations required a plethora of very toxic chemicals. Chlorinated solvents were used to create flavorings for food products. The facility manufactured its own insecticides to treat pests, and its own plastics to wrap hotdogs. There were only few (if any) environmental regulations during much of this time--and when more stringent regulations were eventually developed, they were all too often only minimally followed or ignored.

Over the decades, petroleum compounds, chlorinated solvents, heavy metals, and countless other toxic chemicals were spilled, leaked, and discharged in other ways onto the soils and groundwater at Oscar Mayer. Chemicals eventually made it to the facility's own deep wells so they were shut down. After that, Oscar Mayer's hotdogs were plumped with water from Madison Water Utility's Well #7.

Oscar Mayer [sewage wastes](#) and ammonia spilled into Lake Monona repeatedly, sometimes [causing fish kills](#). Toxic chemicals from the site leached into the Yahara River, Starkweather

Creek, and Lake Monona, building up in fish that many people, including low income minority anglers, eat regularly.

In 2020, about 100 years after Oscar Mayer began operating here, plumes of vinyl chloride, trichloroethylene (TCE), and a toxic stew of other chemicals remains in soils and lurks in groundwater beneath the site--and likely a large area beyond it. These plumes have never been remediated. Nobody knows how far and wide they extend. The groundwater in the whole area is shallow and comes up into neighborhood basements when it floods--possibly exposing people in homes to hazardous chemicals and vapors.

Now the City of Madison wants to develop affordable housing, businesses, and a bus barn on this poisoned industrial land. What does "sustainable development" mean in this context?

1. Preventing the creation of new environmental injustices. The current version of the OMSAP does not mention environmental justice. Locating affordable housing on a highly contaminated site without fully assessing and cleaning up the contamination first is *creating* an environmental injustice situation. Placing housing for already socioeconomically disadvantaged people (who have fewer choices about where to live) in locations where they will be exposed to toxic chemicals that cause serious health problems is one way cities create environmental justice situations.

2. Addressing #1 requires fully assessing and remediating all the toxic contaminants at the site, those that have migrated off the site, and how they might affect public and environmental health--before redevelopment.

Unfortunately, as we described in our [February 10, 2020 comments to the Plan Commission](#), the OMSAP includes only very sparse mention of the contamination at the OM site and surrounding sites. This [Midwest Environmental Advocates document](#) also describes and [maps](#) numerous areas where toxic contaminants remain in the Oscar Mayer and adjacent areas. At most of these sites, contaminants were never fully assessed and/or remediated. Unless fully remediated, these contaminants will be disrupted during redevelopment and will continue to migrate offsite in stormwater, floodwaters, surface waters and other pathways. People will be exposed to these contaminants in surface water, groundwater, and vapors. They will continue to build up in fish that many people, especially low income subsistence anglers, catch and eat.

3. Comprehensive and transparent public engagement about contamination on all parts of the site. The OMSAP process, though lacking thorough discussion and engagement about the contamination at the site, involved a fairly comprehensive public engagement process overall. However, the the City's planned Metro bus barn purchase did not, and is now being rushed through city approvals mostly behind closed doors, with no public engagement and no transparency about the serious contamination.

The city is proposing to purchase Buildings 43 and 50 of the Oscar Mayer site for bus barns. Building 50 is where Oscar Mayer formerly manufactured plastics, and a plume with significant levels of vinyl chloride was found near it many years ago. This plume was never remediated.

Recently, extraordinarily high levels of trichloroethylene (TCE) and other volatile organic compounds vapors have been found under Building 43, emanating from a shallow groundwater plume of VOCs there. This plume has very likely spread under a much wider area. The full horizontal and vertical extent of this plume needs to be defined to assess risks to Metro workers in this building, as well as risks to neighborhood homes and businesses.

The Metro bus barn purchase should undergo the same public process as the OMSAP, including full transparency about the significant toxic contamination there and how it will be assessed and remediated.

4. Preservation of full 30 acre Hartmeyer wetland area. As we described in our [June 10, 2020 comments to the Parks Commission](#), MEJO strongly supports the recommendations of the Friends of Hartmeyer Natural Area (FHNA) that the full 30 acres of the Hartmeyer property be preserved. We support the development of much-needed affordable housing in Madison, but it makes no sense whatsoever to pave over any wetlands at all in these times of increased climate change and flooding. The areas around Oscar Mayer have flooded numerous times, and contaminated floodwaters enter people's basements. Many middle to low income people are exposed to these contaminated waters and have to pay to remediate their homes--yet another environmental justice issue. Preserving as much wetland as possible is critical to mitigating future flooding. The Hartmeyer wetland also provides critical habitat for wildlife and includes 200 year old oak trees. These trees, here since before European settlement, are invaluable and irreplaceable. Madison has very few such trees left. We should take any and all steps to make sure these trees are not cut down for any reason. In sum, developing any part of this wetland area is not in line with sustainability.

If the above concerns are dismissed or ignored in the OMSAP, the Oscar Mayer redevelopment cannot be called sustainable--and it will only perpetuate the environmental injustices that began with the founding of this city and that continue today.

Madison can, and should, do better.

Thank you for considering my comments,

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