



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAY 15 2019

REPLY TO THE ATTENTION OF:

Major Joseph Sundy  
National Guard Bureau  
Air National Guard Readiness Center, NGB/A4AM  
3501 Fetchet Avenue  
Joint Base Andrews, Maryland 20762-5157

**Re: Draft Environmental Assessment for Proposed Construction, Renovation, and Demolition of Facilities at the 115<sup>th</sup> Fighter Wing, Truax Field, Madison, Dane County, Wisconsin**

Dear Major Sundy:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced draft Environmental Assessment (EA), which was prepared by the National Guard Bureau (NGB) in cooperation with the Wisconsin Air National Guard (WIANG). We are providing comments pursuant to our authorities under the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The proposed action involves construction, demolition, and renovation activities at the 115<sup>th</sup> Fighter Wing facilities at Truax Field. Two alternatives have been provided:

- No Action Alternative. No construction, demolition, or renovation activities would occur at Truax Field.
- Proposed Action. Consists of 27 individual projects at Truax Field, with a total of 25.1 acres of new construction and up to 1.2 acres of new impervious surfaces:
  - Project 1. Construct one canopy covering up to seven R-11 fuel trucks;
  - Project 2. Demolish existing diesel fuel and gasoline tanks in Building B1010 and add new tanks behind Building B1212;
  - Project 3. Replace two existing 100,000-gallon tanks with five new 50,000-gallon jet fuel tanks in same area;
  - Project 4. Construct a new 12,700 square-foot (SF) arm/de-arm pad near the intersection of Taxiways G and F;
  - Project 5. Construct a new gate house, two lanes for privately owned vehicles, and one truck lane at the main gate;
  - Project 6. Repave all roads on base (except for Mitchell Street);
  - Project 7. Convert Mitchell Street to a two-lane road (from a four-lane road), and expand the parking areas to the south in a northward direction;

- Project 8. Construct an earthen berm southeast of the munitions storage area (MSA) and a fence to provide protection from aircraft artillery;
- Project 9. Construct five 1,000 SF concrete fuel cells onto the existing fuel cell structure (Building B716);
- Project 10. Construct two new MSA igloos to the northeast side of the existing MSA igloos (Buildings B710 and B711);
- Project 11. Convert the 50-foot-wide asphalt taxiway to a 40-foot wide concrete road;
- Project 12. Demolish Buildings B31 and B307, and construct a new parking area in the same location;
- Project 13. Perform internal renovations of Building B500 to create room for a multi-use facility and a new fitness center;
- Project 14. Construct a new 3,400 SF warehouse;
- Project 15. Replace the existing boundary fence with a new 10-foot-high fence;
- Project 16. Perform internal renovations to Building B503;
- Project 17. Demolish two 500 SF unheated enclosed shelter and repave all existing asphalt in the Building B402 complex;
- Project 18. Construct a 15-by-100-foot-wide bay onto the west side of Building B1210 for warm storage;
- Project 19. Construct a 1,500 SF bay on the south side of Building B430, and demolish Building B1206;
- Project 20. Renovate Building B1212 and add new windows;
- Project 21. Construct a 10,500 SF indoor small arms;
- Project 22. Add on 1,800 SF to Building B1212;
- Project 23. Perform road repairs near the front gate of the installation, including on Pierstorff Street to Highway 51 and on Pearson Street to Anderson Street;
- Project 24. Replace pavement and regrade the area around Buildings B1000 and B1001;
- Project 25. Install underground fiber optic communications cable along Wright Street from Mitchell Street to Sloan Street;
- Project 26. Construct a 1,000 SF small arms storage building; and
- Project 27. Add new street lighting on Benson and Becker Streets.

EPA provided scoping comments on this proposed project in a letter dated March 18, 2019. In that letter we included comments relating to water quality, wetlands, air quality strategies, stormwater management and transportation resiliency, legacy pollution, environmental justice, pollinators and native plant species, energy efficiency, recycling and reuse of construction materials, cumulative impacts, and consultation records. We appreciate NGB addressing our comments relating to water quality, wetlands, air quality strategies, stormwater management and transportation resiliency, legacy pollution, energy efficiency, recycling and reuse of construction materials, cumulative impacts, and consultation records. Based on the information provided in the EA, we wish to reiterate and expand upon our comments relating to environmental justice, and pollinators and native plant species, as stated below.

### Environmental Justice and Groundwater Contamination

The EA provided a general discussion of environmental justice (EJ), however, it was concluded that no communities with EJ concerns are located near Truax Field. EPA is aware that low income and minority populations live in the vicinity of Wright and Straubel Streets, just south of Truax Field, which we understand to have once been part of Truax Field. We further understand that some of those residents may consume fish from Starkweather Creek, which is listed under Clean Water Act (CWA) Section 303d as impaired for chronic aquatic toxicity, primarily for legacy pollutants<sup>1</sup> that are currently sequestered in the streambed sediments. Therefore, in addition to there being a water quality issue, fish from Starkweather Creek that are consumed may contain bioaccumulated toxins that may not be appropriate for human consumption.<sup>2</sup> We do, however, understand that the Wisconsin Department of Natural Resources (WDNR) is planning to conduct surface water and fish tissue sampling in Starkweather Creek, near the affected EJ communities, later this year. We highly recommend NGB and WIANG should coordinate with WDNR on this effort. Sampling results should be compiled and released to the public as a detailed report, including proposed mitigation strategies (if applicable).

Due to the soil-disturbing nature of the proposed projects, the EJ communities located south of Truax Field may be disproportionately impacted by unearthing and reintroducing legacy pollutants into Starkweather Creek. Further, we disagree that the legacy pollutants can be managed solely by erosion control best management practices (BMP) and the existing stormwater pollution prevention plan (SWPP). Because the pollutants themselves are in a dissolved state, they cannot be physically strained out of water in the same manner as sediments. We recommend NGB and WIANG commit to engaging collaboratively with the residents and/or their appointed representative(s) of the EJ communities to identify mitigation measures that will address the disproportionate impacts in a timely manner. Below are some recommendations that we believe may address the contamination and disproportionate EJ impacts:

- NGB and WIANG should continue to coordinate and work collaboratively with WDNR to investigate and remediate contamination and restore the natural environment at Truax Field and within Starkweather Creek and its floodplain, in a timely manner, in accordance with Section 292.11 of the Updated 2017–2018 Wisconsin Statutes.
- If comprehensive remediation is not feasible, NGB and WIANG should commit to using currently-available treatment technologies to remediate PFAS and other contaminants,<sup>3</sup> to avoid introducing more pollutants<sup>4</sup> into Starkweather Creek when soil excavation activities occur;
- Section 3.11.2.4 of the EA identifies nine areas of possible PFAS release locations that were recommended for further investigation. Three of these areas involve planned construction and demolition. The plans for addressing these areas should be identified so the planned construction and demolition activities can be integrated into

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<sup>1</sup> We understand the legacy pollutants to include Per- and Polyfluoroalkyl Substances (PFAS), Polychlorinated Biphenyls (PCBs), and inorganic metals.

<sup>2</sup> See EPA research: <https://www.epa.gov/chemical-research/research-and-polyfluoroalkyl-substances-pfas>

<sup>3</sup> See a list of treatment technologies at: <https://oaspub.epa.gov/tdb/pages/contaminant/treatmentSummary.do>

<sup>4</sup> Treatment technologies available for many pollutants can be found at: <https://oaspub.epa.gov/tdb/pages/contaminant/findContaminant.do>

a remediation plan. Exposing soil through demolition could allow more rainwater to infiltrate into the ground, thus potentially expanding the currently-known contamination plumes.

Pollinators and Native Plant Species

Due to the steep decline in pollinator populations, we urge FAA to implement the 2014 Presidential Memorandum (PM) entitled, "Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators<sup>5</sup>" into the proposed project design. Truax Field is located within the habitat range of the federally-endangered Rusty Patched Bumble Bee (RPBB). By voluntarily creating suitable habitat for the RPBB and other pollinators, the American public can be confident that federal government agencies are actively taking steps to reverse the decline of pollinators, including the RPBB.

We are available to discuss these comments at your convenience. Please feel free to contact the Lead NEPA Reviewer, Mike Sedlacek, at 312-886-1765, or by email at [sedlacek.michael@epa.gov](mailto:sedlacek.michael@epa.gov).

Sincerely,



Kenneth A. Westlake  
Deputy Director, Office of Multi-Media Programs  
Office of the Regional Administrator

cc: Mike Schmoller, Wisconsin Department of Natural Resources  
Judy Fassbender, Wisconsin Department of Natural Resources  
Captain Matthew Shaw, Wisconsin Air National Guard  
Satya Rhodes-Conway, City of Madison

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<sup>5</sup> [www.whitehouse.gov/briefing-room/presidentialactions/presidential-memoranda](http://www.whitehouse.gov/briefing-room/presidentialactions/presidential-memoranda)