



May 8, 2019

Major Joseph T. Sundy, USAF
Plans and Requirements Officer
Air National Guard Readiness Center, NGB/A4AM
3501 Fetchet Ave.
Joint Base Andrews MD 20762

Subject: Comments on Draft Environmental Assessment

Dear Major Sundy:

Thank you for the opportunity to comment on the draft Environmental Assessment (EA) for Construction and Demolition Projects at the 115th Fighter Wing Installation, Dane County Regional Airport, Madison, Wisconsin. On behalf of the Wisconsin Department of Natural Resources, and as the department's coordinator for the Wisconsin Environmental Policy Act (WEPA) and NEPA, I have coordinated the review of the draft EA and am providing the following comments:

Water Resources

Figure 3.5-1 on page 3-15 of the draft EA: "Water Resources and Wetlands within the Vicinity of the 115 FW Installation." The Wisconsin Wetland Inventory includes information regarding wetlands located in the vicinity of the project area that are not depicted in this figure. The inventory, including geographic information system maps, is available at <https://dnr.wi.gov/topic/wetlands/inventory.html>.

Biological Resources

Activities that may impact the Big Brown Bat (*Eptesicus fuscus*), a State Threatened Species, will need to follow state endangered species regulations, as applicable, and should be conducted according to the department's broad incidental take permit/authorization for Wisconsin cave bats.

Hazardous Materials and Wastes

Sections 3.11 and 4.11 of the draft EA do not sufficiently address Per- and Polyfluoroalkyl Substances (PFAS) contamination. Although there is mention of the nine Potential Release Locations (PRLs) investigated in 2018, there is no discussion of the potential for PFAS contamination elsewhere at the installation.

The discussion of projects associated with PRLs (pg. 4-29) indicates that 2 of the 27 projects covered by the draft EA are likely to encounter PFAS contaminated materials: Project #15 and Project #19. Additional site investigation is required to confirm whether and to what extent these and other construction or demolition projects will encounter PFAS contaminated materials.

Per Chapter NR 700 (series) of the Wisconsin Administrative Code, more extensive field work is needed to define the nature and extent of PFAS related contamination. The department has been working with the Wisconsin Air

National Guard to investigate PFAS impacts at the installation under a Department of Defense and State Memorandum of Agreement.

Thank you again for the opportunity to comment on the draft EA for Construction and Demolition Projects at the 115th Fighter Wing Installation. Please contact me at (608) 267-7853 or AdamC.Mednick@Wisconsin.gov with any questions or comments you may have regarding this letter.

Sincerely,

A handwritten signature in red ink, appearing to read 'Adam C. Mednick', with a long horizontal flourish extending to the right.

Adam C. Mednick, AICP
Wisconsin Environmental Policy Act Coordinator

Cc: Dave Siebert, AD/8
Darsi Foss, AD/8
Mark Aquino, SCR
Eric Heggelund, SCR
Judy Fassbender, RR/5
JD Smith, SCR