

September 23, 2019

Madison Water Utility Board Comment on the Draft United States Air Force F-35A Operational Beddown National Guard Environmental Impact Statement (EIS) pertaining to the 115 Fighter Wing at Truax Field

The Madison Water Utility Board (the Board) is established to direct the outcomes of the Madison Water Utility (MWU) in fulfilling its responsibility to provide safe, affordable and adequate water for drinking, household and business uses, and fire protection to the residents and visitors of MWU's service area in Dane County.

Of its many duties, the identification, public communication, monitoring and mitigation of drinking water contamination is a primary activity of the Utility. Monitoring and mitigation are both critical and costly activities, affecting both the affordability and adequacy of water for our area.

In the recent months, MWU, the Board and citizens of Madison have been working together to understand, quantify and assess the effects of per- and polyfluoroalkyl substances, or PFAs, now found in Well 15. The well is located less than a mile from Truax Field, where PFAs chemicals have been detected and reported at high levels in groundwater. In our community, there is considerable concern and demand for action to respond to this risk. The Board is actively engaged in exploring actions and uniting all partners in understanding and plans to protect against a public health threat.

The Air National Guard Base has been identified as a major source of PFAs contamination. While an investigation is underway, steps required by the Wisconsin DNR (WDNR) to further investigate the extent of the contamination have not yet been taken, and the Department of Defense has not considered this a priority site for mitigation.

Further, the Board concurs with the following section of the City of Madison Planning Division F35 EIS Staff Analysis, published September 10, 2019: The Department of Defense and the Air National Guard cannot safely and legally perform the planned construction activities without a complete site investigation that defines the extent and nature of PFAs contamination in soil and groundwater. The WDNR will require a materials management plan for any areas of the base impacted by construction, describing how excavated soil and dewatering will be managed. The 115 FW does not have enough information presently to do this. This investigation should be completed with full coordination with WDNR, and remediation of the contamination should take place concurrently in the event of a F-35 transition.

This is not an acceptable position for Madison and its residents, who rightfully expect to have clean and safe drinking water available to them without bearing the high cost of additionally treating or replacing productive drinking water wells.

Until further steps are taken to define the extent, nature and probable path of the soil and groundwater contamination, MWU's rate payers are left with an unknown cost and timeline should treatment be needed at Well 15.

The Madison Water Utility Board urges the Department of Defense and United States Air Force to complete the PFAs investigation, coordinating fully with WDNR; remediate the contamination, and assume the costs borne by the Madison Water Utility rate payers to provide adequate treatment for PFAs at Well 15 or replace the affected well. We look forward to the Air Force and the 115 Fighter Wing acting as good neighbors, who share our goal of protecting the safety and health of our shared community, before adding additional infrastructure and jet capability at the Truax base.

Sincerely,
Members of the 2019 Madison Water Utility Board