

Board of Public Works Statement on proposed Air National Guard F-35A Operational Beddown

October 16, 2019

The Board of Public Works is charged by Wisconsin state law and Madison municipal ordinance to ensure that our streets and storm water infrastructure are in good working order. In a city that is facing increasingly intense rain events, the Board is further burdened with monitoring the quality of water that flows through our storm sewer infrastructure to our city's lakes.

The Board has been following the reports of per- and polyfluoroalkyl substances (PFAS) contamination at Truax Field, as well as the results of the testing of Madison's drinking water wells. Left unremediated and uncontained, it is highly probable this contamination is subject to the impact of rain events.

On October 7th, 2019, the Wisconsin Department of Natural Resources (WDNR) released PFAS test results of water from Starkweather Creek, which flows adjacent to Truax Field. The WDNR tested six surface water bodies suspected of being contaminated by PFAS, and the concentrations in Starkweather Creek were the highest in the state. Specifically, the study detected perfluorooctane sulfonate (PFOS) at 270 ng/l and perfluorooctanoic acid (PFOA) at 43 ng/l.

The WDNR study identified the only known upstream PFAS source as the Truax Field Air National Guard Base (<https://dnr.wi.gov/topic/Contaminants/WaterQuality.html>). There is no doubt that PFAS contamination at Truax Field is actively being released into the environment, further contaminating Starkweather Creek, Lake Monona, and groundwater in Madison, WI.

The Board is concerned that construction activities on the Truax ANG Base will disturb soil contaminated with PFAS. Traditional erosion control measures can stop sediment from entering Starkweather Creek, but they will not stop the movement PFAS contamination. A site investigation conducted under WDNR supervision and in full accordance with the Wisconsin Administrative Code NR 700 Series has not been completed for the base. As such, any excavation of soil risks releasing more PFAS contamination into Starkweather Creek and Lake Monona, exposing residents who swim in this lake as well as those who fish there for sustenance.

The draft EIS recommends that a "Media Management Plan" be established to monitor PFAS levels and manage the contamination during construction. However, the draft EIS but does not provide estimates for the costs associating with managing the contamination during the construction phase, nor does it provide information as to which agencies would be available to cover these costs.

The Board of Public Works requests that the final EIS include an analysis of the costs to contain and remediate PFAS on the planned construction site. The Board further requests that no construction take place on the base in the absence of site remediation and clean-up under the supervision of the Wisconsin DNR.