

**APPENDIX A
PUBLIC COMMENT
SUMMARY REPORT**



science for a changing world

Draft Environmental Impact Statement

COMMENT SUMMARY REPORT

Proposed Development of an Updated Facility
for the National Wildlife Health Center

Madison, Wisconsin

Prepared for:
United States Geological Survey

August **2024**

National Wildlife Health Center Draft Environmental Impact Statement Comment Summary Report

U.S. GEOLOGICAL SURVEY

August 2024

Executive Summary

The United States Geological Survey (USGS) is proposing to develop an updated facility for the National Wildlife Health Center (NWHC) that can meet the agency's current and future needs, streamline delivery of research, improve worker and public safety with modern biohazard and pathogen containment and biological-waste disposal, and control operating costs. To ensure a comprehensive understanding of the potential environmental impacts, the USGS prepared a Draft Environmental Impact Statement (DEIS) in accordance with the National Environmental Policy Act (NEPA). The Notice of Availability of the DEIS was published in the Federal Register on June 14, 2024, and the 45-day public review period was open from June 14, 2024, to July 29, 2024.

The public was made aware of the EIS process and how to provide feedback during the public review period through notices, flyers, newspaper ads, an email newsletter, social media messages, an article in the NWHC newsletter, and a dedicated project website. The public was encouraged to submit comments through the project website (<https://www.nwhceis.com>) or via email to Jordan Sizemore, USGS NEPA Project Manager. Hard copy comments submitted via mail were also accepted.

The USGS hosted both a virtual and in-person public meeting on July 18, 2024. The virtual public meeting was attended by 6 agency representatives and members of the public, and the in-person public meeting was attended by 3 members of the public. These sessions included a presentation on the proposed action and analysis in the DEIS and a question-and-answer session and provided information on how interested members of the community could provide comments. Attendees could also provide written comments at the in-person public meeting. Attachment B includes copies of public materials shared during the public review period.

The USGS considered all comments from members of the public, organizations, and regulatory agencies, including comments received directly through US mail or email. A total of 6 pieces of correspondence were received via the project website and email during the public comment period, and a total of 50 individual comments were coded. Commenters recommended ways to improve the sustainability of the proposed new NWHC under the Preferred Alternative, including pursuing Leadership in Energy & Environmental Design (LEED) certification at the platinum level, using recycled materials for construction, adding electric vehicle charging stations, and implementing stormwater management measures. Commenters addressed various issues and impact topics, including climate change, wildlife and vegetation, environmental justice, air quality, and cultural resources. One commenter requested that the USGS create a new section in the Final EIS detailing mitigation commitments to reduce or avoid adverse impacts. This Public Comment Summary Report summarizes all comments and concerns expressed during the public review period. Copies of each piece of correspondence received and responses to comments are included in Attachment A.

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1. Comment Analysis

1.1 Definition of Terms

Correspondence: Correspondence is considered the entire document received from a commenter. This includes mailed letters, handwritten comments, emails, and comments entered directly into the comment form on the project website.

Comment: A comment is a portion of the text within a correspondence that addresses a single subject. It could include information such as an expression of support or opposition for an alternative, additional data regarding existing conditions, or suggestions for resource topics to be considered. Substantive comments are defined as those that:

- question, with reasonable basis, the accuracy of the information in the NEPA document;
- question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis;
- present new information relevant to the analysis;
- present reasonable alternatives other than those analyzed in the NEPA document; or
- cause changes or revisions in one or more of the alternatives.

Code: A category or grouping centered on a common subject. The codes were developed during the scoping process, expanded upon for public review of the DEIS, and used to track major subjects. Each comment is assigned one code.

Concerns: Concerns are statements that summarize the comments under each code. Each code was further characterized by concern statements to provide better focus on the content of substantive comments. Codes may require multiple concern statements.

Quotes: Representative quotes have been taken directly from the text of the correspondence received from the public and further clarify the concern statements. Quotes have not been edited for grammar.

1.2 Comment Analysis Methodology

Correspondence was received by email or submitted via web form through the project website. The project team entered correspondence received through email into the comment management system, read each piece of correspondence, and identified specific comments within each unique correspondence. When identifying comments, efforts were made to capture the full breadth of comments submitted.

To categorize comments, each was given a code to identify its general content and to group similar comments. A total of 16 codes were used to categorize substantive public comments received on the DEIS. An example of a code is *AL2000 –Alternatives: Preferred Alternative (Development of a New NWHC)*. Once comments in each piece of correspondence were categorized by code, all comments were categorized with similar comments. Concern statements were then created for groups of similar comments. Representative quotes are provided for each concern statement.

1.3 Correspondence Received

The following tables (Tables 1-5) are based on data from the comment management system. Data on the number of correspondences received by correspondence type, organization type, state, and substantive or non-substantive are presented in Tables 1-4. Table 5 summarizes the number of comments received under each code.

Full correspondences submitted by federal and state agencies and non-governmental organizations are provided in Attachment A. A total of 50 individual comments were derived from the 6 correspondences received.

TABLE 1. CORRESPONDENCE DISTRIBUTION BY CORRESPONDENCE TYPE

Correspondence Type	Correspondences
Web Form	1
Letter	2
Email	3
Other	0

TABLE 2. CORRESPONDENCE DISTRIBUTION BY ORGANIZATION TYPE

Organization Type	Correspondences
Unaffiliated Individual	2
Non-governmental Organization	1
State Government	2
Federal Government	1
Tribal Government	0

TABLE 3. CORRESPONDENCE DISTRIBUTION BY STATE

State	Correspondences
Illinois	1
Michigan	1
New Mexico	1
Utah	1
Wisconsin	1

TABLE 4. SUBSTANTIVE AND NON-SUBSTANTIVE CORRESPONDENCE

Substantive/Non-substantive	Correspondences
Substantive	3

Substantive/Non-substantive	Correspondences
Non-substantive – General Support	2
Non-substantive – General Oppose	1
Total	6

TABLE 5. NUMBER OF COMMENTS PER CODE

Code	Number of Comments
Alternatives	
AL1000 – Alternatives: No Action (Continued Operation of Current NWHC)	0
AL2000 – Alternatives: Preferred Alternative (Development of a New NWHC)	13
AL3000 – Alternatives Considered but Dismissed	0
AL4000 – New Alternatives or Alternative Elements	0
AL5000 – Range of Alternatives	0
Issues/Impact Topics	
IT1000 – Issues/Impact Topics Considered	2
IT2000 – Issues/Impact Topics: Environmental Justice/Equity	2
IT3000 – Issues/Impact Topics: Biosafety	0
IT4000 – Issues/Impact Topics: Construction Impacts	13
IT5000 – Issues/Impact Topics: Socioeconomic Impacts	0
IT6000 – Issues/Impact Topics: Biological Resources	10
IT7000 – New Issues/Impact Topics	0
Other Substantive	
CC1000 – Consultation and Coordination: General Comments	4
IA1000 – Impact Analysis: Impact Analyses	0
NP1000 – NEPA: Planning Process and Policy	6
NP2000 – NEPA: Purpose and Need	0
Non-Substantive	
MS1000 – Miscellaneous Topics: General Comments	0
Total	50

2. Comment Summary

2.1 Comment Summary Structure

Within the comment summary that follows, major concepts and unique perspectives are represented from the comments received during the comment period. The summary includes substantive comments only; Table 4 above summarizes the number of non-substantive comments received.

2.2 Alternatives

2.2.1 AL1000 – ALTERNATIVES: NO ACTION (CONTINUED OPERATION OF CURRENT NWHC)

AL1000 – Alternatives: No Action (Continued Operation of Current NWHC)	Substantive comments pertaining to the no action alternative, continued operation of the current NWHC.	Total Comments: 0
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No comments related to this code were received during public review of the DEIS.

2.2.2 AL2000 – ALTERNATIVES: PREFERRED ALTERNATIVE (DEVELOPMENT OF A NEW NWHC)

AL2000 Alternatives: Preferred Alternative (Development of a New NWHC)	Substantive comments pertaining to the preferred alternative, development of a new NWHC, including comments providing specific suggestions or new information or asking questions.	Total Comments: 13
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LEED Certification

CONCERN STATEMENT: One agency commenter recommended that the USGS achieve LEED certification at the platinum level for the Preferred Alternative. The commenter suggested best practices for energy efficiency and sustainable design, including the use of energy-efficient building materials, such as south-facing skylights and windows; motion-sensored lighting; solar, wind, and/or geothermal power; and Energy Star-certified windows and doors. The commenter suggested that the USGS use the General Service Administration’s 2022 Sustainable Design Checklist for New Construction and Major Modernization Projects to pursue LEED credits and that the USGS analyze these strategies and discuss options and commitments in the FEIS.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

To the extent practicable, adhere to CEQ’s Guiding Principles for Sustainable Federal Buildings. EPA previously recommended that USGS commit to achieving Leadership in Energy & Environmental Design (LEED) certification at the platinum level (or design for net-zero energy usage) for all new buildings associated with the project. We suggest use of the General Service Administration’s 2022 Sustainable Design Checklist for New Construction and Major Modernization Projects to pursue LEED credits, which aligns with CEQ’s Guiding Principles for Sustainable Federal Buildings.

Organization/Individual: Environmental Protection Agency

Achieving Leadership in Energy & Environmental Design certification at the platinum level (or design for net-zero energy usage) for all new buildings associated with the project. Best practices for energy efficiency and sustainable building design can include the use of energy-efficient building materials, such as south-facing skylights and windows, motion sensed lighting, solar, wind, and/or geothermal power, and Energy Star certified windows and doors. In addition to reducing the overall environmental footprint, green building certification programs promote health by encouraging practices that protect indoor air quality. At a minimum, EPA encourages USGS to commit to analyze the strengths and feasibility of these strategies and discuss options and commitments in the FEIS

Recycling and Recycled Materials

CONCERN STATEMENT: One agency commenter requested that the USGS commit to recycling a high percentage of construction and demolition debris, considering strategies such as using recycled materials to replace carbon-intensive Portland Cement in concrete, using tire-derived aggregate in lightweight embankment fill and retaining wall backfill, and using recycled materials in pavement applications. The commenter suggested the USGS consider using demolished onsite asphalt (e.g., cold in-place recycling or full-depth reclamation).

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Energy efficient design and material selection could reduce operations costs and promote a high-quality work environment, while also better protecting the environment. Recycling construction debris also preserves valuable landfill space and makes use of materials that have high embodied energy.

Organization/Individual: Environmental Protection Agency

Committing to recycle a high percentage of construction and demolition debris; and Replacing raw materials with recycled materials for infrastructure components. Options include, but are not limited to: • Using recycled materials to replace carbon-intensive Portland Cement in concrete as “supplementary cementitious material;” • Using tire-derived aggregate in lightweight embankment fill and retaining wall backfill; and • Using recycled materials in pavement applications, such as crushed recycled concrete, recycled asphalt pavement, and rubberized asphalt concrete. Also, in some circumstances, demolished onsite asphalt can be re-used (e.g., cold in-place recycling or full depth reclamation).

Permeable Pavement

CONCERN STATEMENT: One agency commenter suggested constructing paved surfaces with pervious or porous pavement to reduce surface runoff.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Constructing proposed roads, parking lots, sidewalks, or other surfaces slated for driving or walking with using permeable pavement or porous pavers to reduce runoff

Lighting

CONCERN STATEMENT: One agency commenter suggested the USGS commit to designing lighting consistent with the International Dark Sky Model Lighting Ordinance and National Park Service sustainable lighting principles.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Committing to adhere to the International Dark Sky Model Lighting Ordinance and to design lighting consistent with National Park Service sustainable lighting principles;

Native Habitat

CONCERN STATEMENT: One agency commenter suggested that the USGS consider converting areas of the NWHC property around new buildings that would not be used for operations to native habitat.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Ensuring areas around all new buildings associated with the project which are not planned for operations be considered for conversion to native habitats, increasing the area which can be beneficially used for wildlife, stormwater infiltration or detention, and aesthetics, among other functions;

Drainage and Stormwater

CONCERN STATEMENT: One agency commenter suggested that the USGS commit to siting new facilities in a manner generally compatible with existing topography and drainage patterns and installing a stormwater system consisting of storm sewer piping and inlets, a bioretention basin, rainwater harvesting tanks, and use of existing depressions in the south prairie area. The commenter suggested additional green stormwater management practices, including green roofs, bioswales, and rain gardens.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Identifying and implementing of opportunities for additional green stormwater management practices. Opportunities include, but are not limited to, green roofs, bioswales, and rain gardens;

Organization/Individual: Environmental Protection Agency

Site the new NWHC building footprint, access and internal service driveways, parking areas, utility corridors, and drainage facilities in a manner generally compatible with existing topography and drainage patterns.

Organization/Individual: Environmental Protection Agency

Commit to installation of a stormwater collection system consisting of storm sewer piping and inlets, a bioretention basin, rainwater harvesting tanks, and use of existing localized depressions in the south prairie area.

Photovoltaic Panel Siting

CONCERN STATEMENT: One agency commenter questioned why photovoltaic (PV) panels are proposed to be sited in the ice fall zone in the northern part of the property, stating that the PV panels would be susceptible to damage.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Provide additional information on why PV panels are proposed to be installed within the ice fall zone of the nearby broadcast antenna. The DEIS stated that construction was not proposed in the northern portion of the site to due to the risks of safety and welfare of staff, visitors, parked vehicles, and the new NWHC structure; it is assumed that PV panels will be susceptible to damage in the same way cars and structures would be.

Electric Vehicles

CONCERN STATEMENT: One agency commenter suggested adding electric vehicle charging stations and designating priority parking spots for carpools and low emission vehicles in parking lots associated with the new NWHC.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Incorporating electric vehicle charging stations in new parking areas and designating priority parking spots for carpools and low emission vehicles.

Bird-Safe Glass

CONCERN STATEMENT: One agency commenter suggested using bird-safe glass in all windows or embellishing facility windows with film or other products to stop or reduce bird strikes.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Utilize bird-safe glass in all windows and/or commit to embellishing facility windows with film or other products available to stop or lessen the impacts to songbirds and migratory birds through window strikes.

2.2.3 AL3000 – ALTERNATIVES CONSIDERED BUT DISMISSED

AL3000 Alternatives Considered but Dismissed	Comments pertaining to alternatives that have been considered but dismissed, including consolidation, relocation, and siting and design alternatives outside of the preferred alternative.	Total Comments: 0
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No comments related to this code were received during public review of the DEIS.

2.2.4 AL4000 – NEW ALTERNATIVES OR ALTERNATIVE ELEMENTS

AL4000 New Alternatives or Alternative Elements	Comments suggesting new alternatives or alternative elements that have not been considered.	Total Comments: 0
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No comments related to this code were received during public review of the DEIS.

2.2.5 AL5000 – RANGE OF ALTERNATIVES

AL5000 Range of Alternatives	Comments pertaining to the range of alternatives.	Total Comments: 0
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No comments related to this code were received during public review of the DEIS.

2.3 Issues/Impact Topics

2.3.1 IT1000 – ISSUES/IMPACT TOPICS CONSIDERED

IT1000 Issues/Impact Topics to be Considered	Comments related to issues or impact topics planned considered in the DEIS.	Total Comments: 2
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Climate Change

CONCERN STATEMENT: One commenter emphasized the need to address issues related to climate change and extinction crises. Specifically, the commenter suggested the proposed action should include measures to reduce fossil fuel use and improve wildlife habitat on the grounds. One commenter recommended discussing to what extent USGS will require energy efficiency measures, greenhouse gas reductions, and other sustainability measures, per Executive Order (EO) 13990 and EO 14008.

Representative Quotes:

Organization/Individual: Individual

I hope this modernization is successful and includes measures to reduce fossil fuel use and improve wildlife habitat on the grounds. The climate and extinction crises are already deadly serious and rapidly getting worse. The design and implementation of all federal projects should seek to help solve these crises. Thank you very much for your kind consideration.

Organization/Individual: Environmental Protection Agency

Discussing to what extent USGS will require energy efficiency measures, greenhouse gas reductions, and other sustainability measures, per Executive Order (EO) 13990 (Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis) and EO 14008 (Tackling the Climate Crisis at Home and Abroad);

2.3.2 IT2000 – ISSUES/IMPACT TOPICS: ENVIRONMENTAL JUSTICE/EQUITY

IT2000 Issues/Impact Topics: Environmental Justice/Equity	Comments or questions related to potential environmental justice impacts.	Total Comments: 2
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Regulatory Language

CONCERN STATEMENT: An agency commenter suggested changing references to "disproportionately high and adverse impacts" to environmental justice communities to "disproportionate and adverse impacts," to align with language used in EO 14096.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Page xiv of the DEIS stated, "The Preferred Alternative would result in disproportionately high and adverse impacts during construction for environmental justice communities in the immediate vicinity of the NWHC property." As noted above, under EO 14096, environmental justice is now evaluated based simply on disproportionate and adverse impacts. The Fact Sheet accompanying EO 14096 states, "The Executive Order [EO 14096] uses the term 'disproportionate and adverse' as a simpler, modernized version of the phrase 'disproportionately high and adverse' used in Executive Order 12898. Those phrases have the same meaning but removing the word "high" eliminates potential misunderstanding that agencies should only be considering large disproportionate effects." EPA recommends modifying references to "disproportionately high [emphasis added] and adverse" to refer to disproportionate and adverse."

Mitigation for Environmental Justice Concerns

CONCERN STATEMENT: An agency commenter requested that USGS provide more explicit and detailed information on what measures USGS will take to avoid, minimize, or mitigate disproportionate and adverse effects to communities with environmental justice concerns during construction of the Preferred Alternative.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Page 3-62 of the DEIS states, "... because environmental justice communities are present in the surrounding area and these communities experience higher levels of exposure environmental hazards, the Preferred Alternative would result in disproportionately high and adverse impacts during construction for these communities. These temporary impacts would include elevated noise levels, traffic, and emissions of air pollutants during construction and the potential for accidental releases of hazardous materials."⁷ Provide more explicit and detailed information on what measures USGS will take to avoid, minimize, or mitigate disproportionate and adverse effects to communities with environmental justice concerns during construction of the Preferred Alternative.

2.3.3 IT3000 – ISSUES/IMPACT TOPICS: BIOSAFETY

IT5000 issues/impact topics: biosafety	Comments or questions related to potential biosafety concerns. This includes comments providing suggestions related to biosafety.	Total comments: 0
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No comments related to this code were received during public review of the DEIS.

2.3.4 IT4000 – ISSUES/IMPACT TOPICS: CONSTRUCTION IMPACTS

IT4000 Issues/Impact Topics: Construction Impacts	Comments related to potential impacts resulting from construction, including noise, traffic, dust, and other impacts.	Total Comments: 13
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Best Management Practices to Mitigate Construction Emissions

CONCERN STATEMENT: One agency commenter emphasized the impacts of long-term exposure to diesel emissions and fugitive dust, which can harm the environment and human health. The commenter recommended that the USGS work to minimize these impacts by following protective measures, as outlined in the Construction Emission Control Checklist attached to their comment, and commit to construction best practices. In addition, the commenter recommended that USGS purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available and require implementation of best management practices during construction.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Committing to applicable practices in the enclosed Construction Emission Control Checklist;

Organization/Individual: Environmental Protection Agency

Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment to meet the following standards.

- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).
- Marine Vessels: Marine vessels hauling materials for infrastructure projects should meet, or exceed, the latest EPA exhaust emissions standards for marine compression-ignition engines (e.g., Tier 4 for Category 1 & 2 vessels, and Tier 3 for Category 3 vessels).
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

Organization/Individual: Environmental Protection Agency

Consider requiring the following best practices through the construction contracting or oversight process:

- Establish and enforce a clear anti-idling policy for the construction site.
- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).
- Where possible, retrofit older-tier or Tier 0 nonroad engines with an exhaust filtration device before it enters the construction site to capture diesel particulate matter.
- Replace the engines of older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.), or with zero emissions electric systems. Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary removal from use and the marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest EPA exhaust emissions standards, or with zero emissions electric vehicles and/or equipment.

Organization/Individual: Environmental Protection Agency

Diesel emissions and fugitive dust from project construction may pose environmental and human health risks and should be minimized. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer term exposure may worsen heart and lung disease.¹ We recommend USGS consider the following protective measures and commit to applicable measures in the Final EIS.

Fugitive Dust Source Controls

CONCERN STATEMENT: One agency commenter suggested practices related to fugitive dust source controls including stabilizing open storage piles and disturbed areas, installing wind fencing and phasing grading operations, and preventing spillage by limiting speeds of earth-moving equipment.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.

Organization/Individual: Environmental Protection Agency

Install wind fencing and phase grading operations where appropriate and operate water trucks for stabilization of surfaces under windy conditions.

Organization/Individual: Environmental Protection Agency

When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Occupational Health

CONCERN STATEMENT: One agency commenter suggested practices related to occupational health including work practices and training to reduce exposure, positioning exhaust pipes away from operators, using respirators, and using enclosed, climate-controlled cabs equipped with HEPA filters.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Reduce exposure through work practices and training, such as maintaining filtration devices and training diesel-equipment operators to perform routine inspections.

Organization/Individual: Environmental Protection Agency

Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.

Organization/Individual: Environmental Protection Agency

Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.

Organization/Individual: Environmental Protection Agency

Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on the type of work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a National Institute for Occupational Safety and Health approval number.

Sensitive Receptors

CONCERN STATEMENT: One agency commenter recommended the USGS employ measures to reduce construction emissions, especially near locations where children live, learn, and play. The commenter requested the USGS specify how impacts to sensitive receptors (i.e., children and those who are elderly or infirm) from construction emissions will be minimized.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Per Executive Order 13045 on Children's Health, EPA recommends the lead agency and project proponent pay particular attention to worksite proximity to places where children live, learn, and play, such as homes, schools, and playgrounds. Construction emission reduction measures should be strictly implemented near these locations in order to be protective of children's health.

Organization/Individual: Environmental Protection Agency

Specify how impacts to sensitive receptors, such as children, elderly, and the infirm will be minimized. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

2.3.5 IT5000 – ISSUES/IMPACT TOPICS: SOCIOECONOMIC IMPACTS

IT5000 Issues/Impact Topics: Socioeconomic Impacts	Comments related to the socioeconomic impacts of the proposed action or alternatives, either beneficial or adverse. This includes comments related to employment, population changes, housing, and tax revenues.	Total Comments: 0
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No comments related to this code were received during public review of the DEIS.

2.3.6 IT6000 – NEW ISSUES/IMPACT TOPICS: BIOLOGICAL RESOURCES

IT6000 Issues/Impact Topics: Biological Resources	Comments or questions related to biological resources.	Total Comments: 10
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Monarch Butterfly

CONCERN STATEMENT: One agency commenter encouraged measures to reduce potential impacts to the monarch butterfly, including conducting a survey for milkweed plants, avoiding milkweed plants during construction, or transplanting milkweed out of the project area.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Committing to conduct a survey for milkweed plants, avoiding milkweed impacts to reduce potential impacts to the monarch butterfly (which is a candidate for listing as a Federally endangered species), and transplanting milkweed plants out of the proposed project area if avoidance is not practicable;

Tree Mitigation

CONCERN STATEMENT: One agency commenter advised the USGS commit to onsite tree mitigation and planting new native trees onsite for every tree to be removed for construction. The agency commenter encouraged implementing tree removal restrictions between June 1-August 15 to avoid impacts to federally-listed endangered, threatened, and candidate species and the common southern flying squirrel.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Committing to planting new native trees onsite for every tree to be removed for construction;

Organization/Individual: Environmental Protection Agency

Implement tree removal restrictions between June 1 – August 15 to avoid impacts to federally-listed endangered, threatened, and candidate species and the common southern flying squirrel.

Organization/Individual: Environmental Protection Agency

Commit to onsite tree mitigation to compensate for the proposed onsite tree removals. Native species should be utilized.

Prairie Restoration

CONCERN STATEMENT: One agency commenter put forward various suggestions to address impacts to temporarily disturbed areas. The commenter recommended the USGS revegetate areas with native prairie species or commit to landscaping these areas with plantings of native and climate adapted species of trees, shrubs, and perennials. The commenter also recommended that the USGS commit to restoring the onsite prairie to ensure no net loss of prairie acreage due to construction. Other recommendations for mitigation commitments included:

- Avoiding or minimizing the spread of invasive species
- Avoiding or minimizing soil disturbance from heavy machinery
- Consider thinning or single tree selection and dense invasive shrub removal
- Committing to monitor and maintain the prairie acreage onsite
- Committing to hydroseeding areas during revegetation or committing to using only plastic-free erosion control netting

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Commit to hydroseeding areas during the establishment of vegetation or commit to using only plastic-free erosion control netting as noted on page 3-25 of the DEIS.

Organization/Individual: Environmental Protection Agency

Implement Best Management Practices, especially those that serve to minimize the spread of invasive species and to avoid or minimize soil compaction. Avoid or minimize soil disturbance and heavy equipment operation during overwintering (mid-October to mid-March). Avoid or minimize forest management that may destroy spring blooming flowers during their bloom periods. Consider thinning or single tree selection and dense invasive shrub removal that may improve overwintering and spring foraging habitat. Use native trees, shrubs, and flowering plants in landscaping.

Organization/Individual: Environmental Protection Agency

Commit to restoring onsite prairie to ensure no net loss of prairie acreage due to construction. Page 3-23 states that approximately 0.74 acre of existing impervious surface will be converted to prairie (adjacent to existing prairie) for a net increase of approximately 0.14 acres of prairie habitat. Commit to monitor and maintain the prairie acreage onsite (e.g., scheduled prescribed burns, removal of woody species, removal of invasive species) to avoid degradation of prairie quality.

Rusty Patch Bumblebee

CONCERN STATEMENT: An agency commenter suggested the USGS install plants that bloom from spring through fall to benefit the rusty patched bumblebee and to remove and control invasive plants in any habitat used for foraging, nesting, or overwintering.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Install plants that bloom from spring through fall (refer to the U.S. Fish and Wildlife Service’s Rusty Patched Bumble Bee Midwest Plant Guide⁹). Remove and control invasive plants in any habitat used for foraging, nesting, or overwintering.

2.3.7 IT7000 – NEW ISSUES/IMPACT TOPICS

IT7000 New Issues/Impact Topics	Suggestions to assess issues or impact topics not already considered in the DEIS.	Total Comments: 0
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No comments related to this code were received during public review of the DEIS.

2.4 Other Substantive

2.4.1 CC1000 – CONSULTATION AND COORDINATION: GENERAL COMMENTS

CC1000 Consultation and Coordination: General Comments	Suggestions of agencies, organizations, or individuals to contact for consultation and/or coordination related to the EIS.	Total Comments: 4
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Inadvertent Discoveries

CONCERN STATEMENT: The Wisconsin State Historic Preservation Office (SHPO) confirmed there are no currently identified resources within the project area and concurs with the findings in the EIS that there will be no adverse effect on any cultural resources with this project. The SHPO requested that the USGS contact their office in the event that cultural resources and/or human remains are found during construction. One agency commenter asked USGS to describe the process for addressing inadvertent discoveries and complying with the Native American Graves Protection and Repatriation Act.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Describe the process for (1) addressing inadvertent discoveries (e.g., Tribal remains, artifacts, other culturally or historically sensitive items), and (2) complying with the Native American Graves Protection and Repatriation Act.

Organization/Individual: State Historic Preservation Office

If your plans change or if cultural resources and/or human remains are found during construction please stop all work and contact this office.

Organization/Individual: State Historic Preservation Office

We concur with the findings in the EIS that there will be no adverse effect on any cultural resources with this project. There are no currently identified resources within the project area.

Section 106 Tribal Consultation

CONCERN STATEMENT: An agency commenter requested that the USGS elaborate on how it will continue to address input from Tribal Historic Preservation Officers (THPOs) and provide documentation of coordination efforts.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Document coordination and input received from Tribal Historic Preservation Officers (THPOs) thus far and explain how USGS has and will continue to address input provided by the THPOs.

2.4.2 IA1000 – IMPACT ANALYSIS: IMPACT ANALYSES

IA1000 Impact Analysis: Impact Analyses	Comments making suggestions regarding the analysis of impacts. This includes comments referring to the use of the best available science.	Total Comments: 0
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No comments related to this code were received during public review of the DEIS.

2.4.3 NP1000 – NEPA: PLANNING PROCESS AND POLICY

NP1000 NEPA: Planning Process and Policy	This includes: 1) Comments on this EIS planning process (such as comments on the project schedule and public meetings), and 2) Comments relating to the policies, regulations, other plans, and laws which should be considered in this EIS.	Total Comments: 6
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Final Environmental Impact Statement

CONCERN STATEMENT: One agency commenter recommended that USGS address its comments and recommendations in the FEIS.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

We recommend that the forthcoming Final EIS (FEIS) address these comments and our recommendations, which generally relate to energy efficiency and green building practices, environmental justice, vegetation disturbance and removal, National Historic Preservation Act concerns, mitigation commitments, and responses to comments received on the DEIS.

Mitigation

CONCERN STATEMENT: One agency commenter recommended adding a section in the FEIS called "Mitigation Commitments," where all identified mitigation, conservation, and adaptation commitments are listed. The commenter recommended confirming all mitigation commitments in the Record of Decision.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

Add a section to the FEIS to be called “Mitigation Commitments” where all identified mitigation, conservation, and adaptation commitments are listed.

Organization/Individual: Environmental Protection Agency

Confirm and include all mitigation commitments in the forthcoming Record of Decision.

Comment Responses

CONCERN STATEMENT: One agency commenter noted that the DEIS did not include responses to comments received during public scoping. The commenter recommended creating an appendix that includes all comment letters and comments received on the DEIS, especially from agencies and Tribes. The commenter asked USGS to provide responses to all substantive comments and comments by agencies and Tribes. The commenter included recommendations related to the organization of comment responses and specified that responses should indicate if changes were made in the FEIS based on a comment.

Representative Quotes:

Organization/Individual: Environmental Protection Agency

In our October 16, 2023, scoping comment letter, EPA provided recommendations and comments to USGS and requested that USGS respond to all recommendations and comments in the DEIS. Appendices to the DEIS summarized comments received from agencies, Tribes, and the public, but did not include USGS’s responses to EPA’s comments or information on how EPA’s comments were incorporated into the DEIS.

Organization/Individual: Environmental Protection Agency

Create an appendix to include all comment letters and public comments received on the DEIS.

Provide the actual comment letters and emails from all government agencies and Tribes. EPA recommends that all comments be responded to individually, especially those from government agencies and Tribes. We suggest use of an organized format to respond to agency and public comments as follows: reproduction of the original comment letter, numeric sequencing of individual comments, and USGS’s corresponding responses to those comments.

Responses to all government and Tribal comments should specify if the recommendation or comment was incorporated into the FEIS. Additionally, USGS’s responses should specify how, and where, the FEIS text was modified to account for the incorporated recommendation.

In addition to agency and Tribal comments, substantive comments received on the DEIS from the public should also be responded to in the FEIS.

2.4.4 NP2000 – NEPA: PURPOSE AND NEED

NP2000 NEPA: Purpose and Need	Comments pertaining to the purpose and need of the EIS or suggesting additions/changes to the purpose and need. Comments suggesting specific objectives relating to the EIS. Comments pertaining to the scope of the EIS.	Total Comments: 0
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No comments related to this code were received during public review of the DEIS.

2.5 Non-substantive

2.5.1 MS1000 – MISCELLANEOUS TOPICS: GENERAL COMMENTS

MS1000 Miscellaneous Topics: General Comments	Comments not relating specifically to this EIS. This includes any items that are outside of the scope of this EIS (e.g., comments regarding aspects of the mission or operations of the NWHC that are not related to the proposed action).	Total Comments: 0
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No comments related to this code were received during public review of the DEIS.

Attachment A

Response to Comments

Note: Click the link in the comment number to be taken to the page with the USGS's response to that comment.

Felipe Avila, June 10, 2024 (Submission 001)

Forbes, Jessica

From: Forbes, Jessica
Sent: Wednesday, June 12, 2024 10:47 AM
To: Forbes, Jessica
Subject: FW: [EXTERNAL] 22-1752/DA - Modernization of National Wildlife Health Center

From: felipe.avila@wisconsinhistory.org <felipe.avila@wisconsinhistory.org>
Sent: Monday, June 10, 2024 7:16 AM
To: Sizemore, Jordan D <jsizemore@usgs.gov>
Subject: [EXTERNAL] 22-1752/DA - Modernization of National Wildlife Health Center

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

- 001-1 | Dear Jordan Sizemore,
We concur with the findings in the EIS that there will be no adverse effect on any cultural resources with this project. There are no currently identified resources within the project area.
- 001-2 | If your plans change or if cultural resources and/or human remains are found during construction please stop all work and contact this office.

Thank you,
Felipe Avila
State Historic Preservation Office

Wisconsin Historical Society
816 State Street, Madison, WI 53706
608 264-6013
felipe.avila@wisconsinhistory.org

Wisconsin Historical Society
[Collecting, Preserving, and Sharing Stories Since 1846](#)

Response to Felipe Avila, June 10, 2024 (Submission 001)

001-1

The USGS acknowledges and appreciates the guidance provided by the State Historic Preservation Office concerning the proposed development of an updated facility for the National Wildlife Health Center.

001-2

To avoid interrupting, delaying, or halting construction once started, an Inadvertent Discovery Plan would be developed prior to initiating ground-disturbing activities. This plan would describe the procedures, protocols, responsibilities, and requirements of the USGS and the construction contractors in the event of a discovery. The plan would include measures to address unanticipated discoveries of cultural resources and artifacts or human remains, funerary objects, sacred objects, and objects of cultural patrimony as regulated by the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) and its implementing regulations (43 CFR §10), in consultation with the State Historic Preservation Office, Tribal consulting parties, and local authorities, as appropriate. The plan would be made available to work crews during all phases of construction that involve ground-disturbing activities. The USGS would continue to consult with Tribes who requested to be consulting parties in the event of an inadvertent discovery of archaeological materials or human remains or cultural items falling under NAGPRA during implementation of the selected alternative.

Richard Spotts, July 15, 2024 (Submission 002)

National Wildlife Health Center - RECORD #39 DETAIL

First name : Richard

Last name : Spotts

Submission :

- 002-1 | I reviewed this EIS and it is excellent. Kudos to those who prepared it. I strongly support the USGS preferred alternative. This alternative would best fulfill the purpose and need for action. I commend this positive work. I
- 002-2 | hope this modernization is successful and includes measures to reduce fossil fuel use and improve wildlife habitat on the grounds. The climate and extinction crises are already deadly serious and rapidly getting worse. The design and implementation of all federal projects should seek to help solve these crises. Thank you very much for your kind consideration.
-

Response to Richard Spotts, July 15, 2024 (Submission 002)

002-1

The USGS acknowledges and appreciates the comments and insight regarding the proposed development of an updated facility for the NWHC.

002-2

The potential for the Preferred Alternative to influence global climatic change has been considered during the preparation of the DEIS. The new NWHC would be designed to current codes and would incorporate measures designed to increase resiliency, such as buried electrical lines and solar PV and geothermal systems, which would reduce the vulnerability of the NWHC to extreme weather events and changing climate conditions.

Mitch Marcus, July 28, 2024 (Submission 003)

From: Marcus, Mitchell (DNR) <marcusM2@michigan.gov>
Sent: Sunday, July 28, 2024 7:06 PM
To: Sizemore, Jordan D <jsizemore@usgs.gov>
Cc: Hiller, Lindsay (DNR) <lhiller1@michigan.gov>
Subject: [EXTERNAL] Comments on the Draft EIS for Updated NWHC

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Jordan,

003-1 | I have reviewed the Draft Environmental Impact Statement – Proposed Development of an Updated Facility for the National Wildlife Health Center (NWHC), Madison, Wisconsin. I support the USGS Preferred Alternative of building a new NWHC on the grounds of the existing NWHC in Madison, WI. I agree that a new facility is needed to continue to provide research, investigation and support response action related to wildlife health. With regard to wild animal health, there continues to be increasing demand for lab and research facilities. Without strategic investments in new facilities, the nation will be unable to adequately address wildlife health concerns, perform needed research, and respond to emerging pathogens that affect wildlife. I appreciate the fact that the design will utilize green energy technology, technological advances for biosafety engineering and equipment, and additional space for enhanced animal care and research. It is desirable that the design will retain natural features on the property with anticipated natural vegetation improvements in some areas that are currently covered with impervious surfaces. Thank you for the opportunity to comment on this project.

Mitch Marcus
Wildlife Health Section Supervisor
Michigan Department of Natural Resources
Wildlife Division – Wildlife Health Section
517-242-0745
4125 Beaumont Road, Room 250
Lansing, MI 48910
Michigan.gov/Wildlife

Response to Mitch Marcus, July 28, 2024 (Submission 003)

003-1

The USGS acknowledges and appreciates the comments regarding the proposed development of an updated facility for the NWHC.

Jean Public, July 29, 2024 (Submission 004)

From: jean public <jeanpublic1@gmail.com>
Sent: Monday, July 29, 2024 4:50 PM
To: Sizemore, Jordan D <sizemore@usgs.gov>
Subject: [EXTERNAL] Environmental Management Branch, USGS Comment

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

004-1

i am not in favor of taxpayer/citizens being bankrupted for more buildings for the govt. especially the way the regulatory agencies are off the wall and corrupt these days. they don't listen to the people at all. we are being bankrupted to pay high salaries, build them buildings, pay pensions, etc. and these agencies only listen to rich corporations and political pushes from congressmen who need campaign cash. the whole system is out of whack. the entire idea of democracy has turned into us all being slaves for the govt. we get nothing out of the govt. it never finds in our favor. the govt works for rich corporations. we need some changes to happen here. we need recognition that one email represents at least 100 people who don't write in on issues, or maybe even more than that in numbers. we cannot have corporate bribes and money being our touchstone.

jean public jeanpublic1@gmail.com, i am in favor of smaller govt. we have too big and corporate a govt these days.

Response to Jean Public, July 29, 2024 (Submission 004)

004-1

The USGS acknowledges and appreciates the comments concerning the proposed development of an updated facility for the NWHC.

Krystle McClain, July 11, 2024 (Submission 005)



July 11, 2024

Jordan D. Sizemore
U.S. Geological Survey
National Wildlife Health Center
606 Schroeder Road
Madison, WI 53711

Re: EPA NEPA Comments – Draft Environmental Impact Statement for the Proposed Updated Facility for the National Wildlife Health Center; Madison, Wisconsin (CEQ #20240102)

Dear Mr. Sizemore,

The U.S. Environmental Protection Agency (EPA) has reviewed the U.S. Geologic Survey's (USGS) Draft Environmental Impact Statement (DEIS) for the development of an updated facility for the National Wildlife Health Center (NWHC) located in Madison, Wisconsin. This letter provides EPA's comments on the DEIS pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementing Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The NWHC, overseen by the USGS, is located at 6006 Schroder Road in Madison, Wisconsin. It was established in 1975 as a biomedical laboratory dedicated to assessing the impact of disease on wildlife and is the only national center devoted to wildlife disease detection, control, and prevention in the U.S. Designated as a "mission essential" facility, the NWHC's age and space constraints are limiting its ability to perform its mission to advance wildlife health science.

According to the DEIS, the NWHC needs a modern facility with sufficient space and modern technologies to support mission-essential research. The need for the project is to update the aging NWHC facility, incorporate technological advances in biosafety engineering and equipment, and add additional space for enhanced animal care and research. Studies undertaken in 2011 and 2016 identified overcrowded laboratories and administrative areas, inefficient infrastructure (e.g., heating, ventilation, and air conditioning systems) that does not meet current standards for energy efficiency, and extensive wear and tear due to the age of the buildings and associated equipment.

In addition to the No Action alternative, the DEIS identified several project alternatives that were considered but ultimately eliminated from detailed evaluation; these included: 1) consolidation of one or more Madison-area Department of the Interior (DOI) agencies at existing, renovated, or modernized facilities on the NWHC property; 2) construction of a new NWHC facility at alternative sites both in and

outside of Madison, Wisconsin; and 3) alternative building placements and configurations on the existing property. The DEIS included the detailed evaluation of the No Action alternative and one action alternative (onsite construction of a new NWHC). USGS identified the preferred alternative to be development of a new NWHC on the 24-acre property of the existing NWHC and demolishing the current facilities in a phased manner over an approximately three-year period.

005-1 | EPA's detailed comments on the DEIS are enclosed with this letter. We recommend that the forthcoming Final EIS (FEIS) address these comments and our recommendations, which generally relate to energy efficiency and green building practices, environmental justice, vegetation disturbance and removal, National Historic Preservation Act concerns, mitigation commitments, and responses to comments received on the DEIS.

005-2 | We appreciate the opportunity to review and provide comments on the DEIS. When the FEIS is released, please notify our office electronically at R5NEPA@epa.gov. If you have any questions about this letter or wish to discuss EPA's comments further, please contact the lead NEPA Reviewer, Liz Pelloso, at 312-886-7425 or via email at pelloso.liz@epa.gov.

Sincerely,

Krystle Z. McClain, P.E.
NEPA Program Supervisor
Environmental Justice, Community Health, and
Environmental Review Division

Enclosures (2):

EPA Detailed Scoping Comments
Construction Emission Control Checklist

Cc (with enclosures):

Nick Utrup, USFWS (nick_utrup@fws.gov)

Krystle McClain, July 11, 2024 (Submission 005) - Continued

EPA Detailed DEIS Comments
 Updated facility for the National Wildlife Health Center (NWHC)
 Madison, Wisconsin

July 11, 2024

- 005-3 **1. ENERGY EFFICIENCY AND ENVIRONMENTAL BEST PRACTICES**
- A. Energy efficient design and material selection could reduce operations costs and promote a high-quality work environment, while also better protecting the environment. Recycling construction debris also preserves valuable landfill space and makes use of materials that have high embodied energy.
- 005-4 **Recommendations for the FEIS:**
1. To the extent practicable, adhere to CEQ's Guiding Principles for Sustainable Federal Buildings¹. EPA previously recommended that USGS commit to achieving Leadership in Energy & Environmental Design (LEED) certification at the platinum level (or design for net-zero energy usage) for all new buildings associated with the project. We suggest use of the General Service Administration's 2022 Sustainable Design Checklist for New Construction and Major Modernization Projects² to pursue LEED credits, which aligns with CEQ's Guiding Principles for Sustainable Federal Buildings.
- 005-5 2. As previously recommended in our October 16, 2023, scoping comment letter, USGS should commit to the following practices in the FEIS and forthcoming Record of Decision:
- a) Achieving Leadership in Energy & Environmental Design certification at the platinum level (or design for net-zero energy usage) for all new buildings associated with the project. Best practices for energy efficiency and sustainable building design can include the use of energy-efficient building materials, such as south-facing skylights and windows, motion sensed lighting, solar, wind, and/or geothermal power, and Energy Star certified windows and doors. In addition to reducing the overall environmental footprint, green building certification programs promote health by encouraging practices that protect indoor air quality. At a minimum, EPA encourages USGS to commit to analyze the strengths and feasibility of these strategies and discuss options and commitments in the FEIS;
- 005-6 b) Constructing proposed roads, parking lots, sidewalks, or other surfaces slated for driving or walking with using permeable pavement or porous pavers to reduce runoff;
- 005-7 c) Committing to adhere to the International Dark Sky Model Lighting Ordinance³ and to design lighting consistent with National Park Service sustainable lighting principles⁴;
- 005-8 d) Committing to applicable practices in the enclosed Construction Emission Control Checklist;
- 005-9 e) Ensuring areas around all new buildings associated with the project which are not

¹ See: https://www.sustainability.gov/pdfs/guiding_principles_for_sustainable_federal_buildings.pdf

² See: <https://www.gsa.gov/system/files/2022%20GSA%20Sustainable%20Design%20Checklist%202-9-2023.pdf>

³ The Model Lighting Ordinance is a template designed to help develop outdoor lighting standards that reduce glare, light trespass, and sky glow. See: <https://darksky.org/resources/guides-and-how-tos/model-lighting-ordinances/>

⁴ See: <https://www.nps.gov/subjects/nightskies/sustainable-outdoor-lighting.htm>

- 005-10 planned for operations be considered for conversion to native habitats, increasing the area which can be beneficially used for wildlife, stormwater infiltration or detention, and aesthetics, among other functions;
- 005-11 f) Identifying and implementing of opportunities for additional green stormwater management practices. Opportunities include, but are not limited to, green roofs, bioswales, and rain gardens;
- 005-12 g) Committing to conduct a survey for milkweed plants, avoiding milkweed impacts to reduce potential impacts to the monarch butterfly (which is a candidate for listing as a Federally endangered species), and transplanting milkweed plants out of the proposed project area if avoidance is not practicable;
- 005-13 h) Committing to revegetating disturbed areas with only approved, native species, with pollinator-friendly plant species prioritized;
- 005-14 i) Committing to planting new native trees onsite for every tree to be removed for construction;
- 005-15 j) Discussing to what extent USGS will require energy efficiency measures, greenhouse gas reductions, and other sustainability measures, per Executive Order (EO) 13990 (Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis) and EO 14008 (Tackling the Climate Crisis at Home and Abroad);
- 005-16 k) Incorporating electric vehicle charging stations in new parking areas and designating priority parking spots for carpools and low emission vehicles⁵;
- l) Committing to recycle a high percentage of construction and demolition debris; and
- m) Replacing raw materials with recycled materials for infrastructure components. Options include, but are not limited to:
- Using recycled materials to replace carbon-intensive Portland Cement in concrete as "supplementary cementitious material;"
 - Using tire-derived aggregate in lightweight embankment fill and retaining wall backfill; and
 - Using recycled materials in pavement applications, such as crushed recycled concrete, recycled asphalt pavement, and rubberized asphalt concrete. Also, in some circumstances, demolished onsite asphalt can be re-used (e.g., cold in-place recycling or full depth reclamation).

2. ENVIRONMENTAL JUSTICE

- A. Outreach and meaningful engagement are underlying pillars of environmental justice. The DEIS referenced Executive Order (EO) 12898: *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. EO 12898 was recently supplemented by Executive Order 14096: *Revitalizing Our Nation's Commitment to Environmental Justice for All*. EO 14096 directs Federal agencies, as appropriate and consistent with applicable law, to identify, analyze, and address disproportionate and adverse human health and environmental effects (including risks) and hazards of Federal activities, including those related to climate change and cumulative impacts of environmental and other burdens on communities with

⁵ EPA acknowledges that the DEIS noted that the proposed dedicated onsite parking for the new NWHC will include with 12 spaces equipped with duplex outlet electric vehicle charging stations.

Krystle McClain, July 11, 2024 (Submission 005) - Continued

environmental justice concerns. Additionally, under EO 14096, environmental justice is now evaluated based simply on disproportionate and adverse impacts.

Section 3 (b)(i) of EO 14096 also directs EPA to assess whether each agency analyzes and avoids or mitigates disproportionate human health and environmental effects on communities with environmental justice concerns when carrying out our NEPA responsibilities under Section 309 of the Clean Air Act. EPA's recommendations below suggest opportunities to further analyze, disclose, and reduce effects to communities with EJ concerns.

Recommendations for the FEIS:

1. Page xiv of the DEIS stated, "The Preferred Alternative would result in disproportionately high and adverse impacts during construction for environmental justice communities in the immediate vicinity of the NWHC property." As noted above, under EO 14096, environmental justice is now evaluated based simply on disproportionate and adverse impacts. The Fact Sheet accompanying EO 14096⁶ states, "The Executive Order [EO 14096] uses the term 'disproportionate and adverse' as a simpler, modernized version of the phrase 'disproportionately high and adverse' used in Executive Order 12898. Those phrases have the same meaning but removing the word 'high' eliminates potential misunderstanding that agencies should only be considering large disproportionate effects." EPA recommends modifying references to "disproportionately high [emphasis added] and adverse" to refer to the current language in EO 14096 (i.e., "disproportionate and adverse").

2. The DEIS's section on Environmental Justice (Section 3.14) indicated that there are communities with Environmental Justice concerns located in or near the Project area. EPA recommends that USGS consider the following, consistent with EO 14096:

- a) Page 3-62 of the DEIS states, "... because environmental justice communities are present in the surrounding area and these communities experience higher levels of exposure environmental hazards, the Preferred Alternative would result in disproportionately high and adverse impacts during construction for these communities. These temporary impacts would include elevated noise levels, traffic, and emissions of air pollutants during construction and the potential for accidental releases of hazardous materials."⁷ Provide more explicit and detailed information on what measures USGS will take to avoid, minimize, or mitigate disproportionate and adverse effects to communities with environmental justice concerns during construction of the Preferred Alternative.

3. SITE DISTURBANCE, VEGETATION DISTURBANCE, AND TREE REMOVAL

- A. Page 2-6 of the DEIS explained that 12 acres on the northern portion of the property was analyzed for siting of the new NWHC building. In doing so, USGS determined that much of this acreage falls within the ice falling zone of a 1,248-foot broadcast antenna located west of USGS's property. Onsite areas within approximately 800 feet of the base of the antenna were

⁶ FACT SHEET: President Biden Signs Executive Order to Revitalize Our Nation's Commitment to Environmental Justice for All. See <https://www.whitehouse.gov/briefing-room/statements-releases/2023/04/21/fact-sheet-president-biden-signs-executive-order-to-revitalize-our-nations-commitment-to-environmental-justice-for-all/>

⁷ EPA acknowledges that the DEIS concluded that operation of the new NWHC is not expected to result in disproportionate or adverse impacts to communities with environmental justice concerns.

thus removed from possible development due to the risks of safety and welfare of staff, visitors, parked vehicles, and the new NWHC structure. This resulted in the Preferred Alternative focusing solely on development of the southern 12 acres of the property.

Development of a new NWHC building to the south of the existing buildings means "... [that construction will be] outside the ice fall zone, allows uninterrupted operation of the existing Main Building and Tight Isolation Building during construction, uses vacant portions of the property for geothermal and PV system installations, and has a lower overall development cost." (p. 2-6). However, development to the south will require encroachment on several acres of an existing 3.65-acre onsite restored prairie⁸ (the south prairie), and one of the two proposed geothermal system fields is proposed to be installed in the remaining south prairie acreage (Exhibit 2-2, page 2-9). Approximately 1.31 acres of the 3.65-acre south prairie would be temporarily disturbed for construction staging and geothermal well drilling. Permanent impacts to approximately 0.60 acre of the south prairie are proposed due to construction of the new building, sidewalks, and a visitor parking area.

Impacts to the existing north prairie acreage is also proposed; approximately 0.80 acre of the north prairie acreage is proposed to be temporarily disturbed for installation of photovoltaic (PV) panels. The preliminary site design figure shows the proposed northern PV panels being installed within the ice fall zone of the nearby broadcast antenna.

Construction of the new NWHC facility also proposes the removal of approximately 1.43 acres of trees from the property. Additionally, individual trees may also be removed from the footprint of the proposed geothermal field in the northern part of the property and near the site entrance to accommodate construction of a new sidewalk.

Recommendations for the FEIS:

1. Provide additional information on why PV panels are proposed to be installed within the ice fall zone of the nearby broadcast antenna. The DEIS stated that construction was not proposed in the northern portion of the site due to the risks of safety and welfare of staff, visitors, parked vehicles, and the new NWHC structure; it is assumed that PV panels will be susceptible to damage in the same way cars and structures would be.
2. Commit to onsite tree mitigation to compensate for the proposed onsite tree removals. Native species should be utilized.

4. NATIONAL HISTORIC PRESERVATION ACT (NHPA)

- A. The National Historic Preservation Act (NHPA) and NEPA are independent statutes, yet may be executed concurrently to optimize efficiencies, transparency, and accountability to better understand the effects to the human, natural, and cultural environment. The DEIS stated that consultation with the Wisconsin State Historic Preservation Officer (SHPO) has concluded.

⁸ A prairie restoration was carried out on the property from 1985 to 1986 and consisted of a 5.7-acre area south of the existing NWHC facilities (south prairie) and a 3.1-acre area north of the facility (north prairie). Trails were incorporated into the south prairie for passive recreation. The prairie areas are currently invaded by trees, brush, and non-native species. The only prairie maintenance undertaken since the restoration is occasional mowing.

Krystle McClain, July 11, 2024 (Submission 005) - Continued

However, the DEIS noted that consultation with Tribes that have cultural and/or historic ties to the NWHC property is ongoing. According to the DEIS, the Forest County Potawatomi and Miami Tribe of Oklahoma requested to be included as consulting parties under Section 106 of the NHPA.

Recommendations for the FEIS:

- 005-21 1. Document coordination and input received from Tribal Historic Preservation Officers (THPOs) thus far and explain how USGS has and will continue to address input provided by the THPOs.
- 005-22 2. Describe the process for (1) addressing inadvertent discoveries (e.g., Tribal remains, artifacts, other culturally or historically sensitive items), and (2) complying with the Native American Graves Protection and Repatriation Act.

5. MITIGATION COMMITMENTS

A. Potential and/or proposed mitigation measures were scattered throughout the DEIS. Mitigation measures specific to individual resource topics were discussed in their respective sections in Chapter 3. However, the DEIS did not include a comprehensive list of mitigation commitments.

Recommendation for the FEIS:

- 005-23 1. Add a section to the FEIS to be called "Mitigation Commitments" where all identified mitigation, conservation, and adaptation commitments are listed. This should include, but is not limited to, the following.
 - 005-24 a) Site the new NWHC building footprint, access and internal service driveways, parking areas, utility corridors, and drainage facilities in a manner generally compatible with existing topography and drainage patterns.
 - 005-25 b) Seed temporarily disturbed areas with native prairie species or commit to landscaping these areas with plantings of native and climate adapted species of trees, shrubs, and perennials.
 - 005-26 c) Commit to hydroseeding areas during the establishment of vegetation or commit to using only plastic-free erosion control netting as noted on page 3-25 of the DEIS.
 - 005-27 d) Commit to installation of a stormwater collection system consisting of storm sewer piping and inlets, a bioretention basin, rainwater harvesting tanks, and use of existing localized depressions in the south prairie area.
 - 005-28 e) Implement tree removal restrictions between June 1 – August 15 to avoid impacts to Federally-listed endangered, threatened, and candidate species and the common southern flying squirrel.
 - 005-29 f) Implement Best Management Practices, especially those that serve to minimize the spread of invasive species and to avoid or minimize soil compaction.
 - g) Avoid or minimize soil disturbance and heavy equipment operation during overwintering (mid-October to mid-March).
 - h) Avoid or minimize forest management that may destroy spring blooming flowers during their bloom periods.
 - i) Consider thinning or single tree selection and dense invasive shrub removal that may improve overwintering and spring foraging habitat.
 - j) Use native trees, shrubs, and flowering plants in landscaping.

- 005-30 k) Install plants that bloom from spring through fall (refer to the U.S. Fish and Wildlife Service's [Rusty Patched Bumble Bee Midwest Plant Guide](#)⁹).
- l) Remove and control invasive plants in any habitat used for foraging, nesting, or overwintering.
- 005-31 m) Commit to restoring onsite prairie to ensure no net loss of prairie acreage due to construction. Page 3-23 states that approximately 0.74 acre of existing impervious surface will be converted to prairie (adjacent to existing prairie) for a net increase of approximately 0.14 acres of prairie habitat.
- n) Commit to monitor and maintain the prairie acreage onsite (e.g., scheduled prescribed burns, removal of woody species, removal of invasive species) to avoid degradation of prairie quality.
- 005-32 o) Utilize bird-safe glass in all windows and/or commit to embellishing facility windows with film or other products available to stop or lessen the impacts to songbirds and migratory birds through window strikes.
- 005-33 2. Confirm and include all mitigation commitments in the forthcoming Record of Decision.
- 005-34 **6. RESPONSES TO COMMENTS RECEIVED**
 - A. In our October 16, 2023, scoping comment letter, EPA provided recommendations and comments to USGS and requested that USGS respond to all recommendations and comments in the DEIS. Appendices to the DEIS summarized comments received from agencies, Tribes, and the public, but did not include USGS's responses to EPA's comments or information on how EPA's comments were incorporated into the DEIS.

Recommendations for the FEIS:

- 005-35 1. Create an appendix to include all comment letters and public comments received on the DEIS.
- 2. Provide the actual comment letters and emails from all government agencies and Tribes. EPA recommends that all comments be responded to individually, especially those from government agencies and Tribes. We suggest use of an organized format to respond to agency and public comments as follows: reproduction of the original comment letter, numeric sequencing of individual comments, and USGS's corresponding responses to those comments.
- 3. Responses to all government and Tribal comments should specify if the recommendation or comment was incorporated into the FEIS. Additionally, USGS's responses should specify how, and where, the FEIS text was modified to account for the incorporated recommendation.
- 4. In addition to agency and Tribal comments, substantive comments received on the DEIS from the public should also be responded to in the FEIS.

⁹ Available online at: <https://www.fws.gov/media/rusty-patched-bumble-bee-midwest-plant-guide>

Krystle McClain, July 11, 2024 (Submission 005) - Continued

**U.S. Environmental Protection Agency
Construction Emission Control Checklist**

005-36 Diesel emissions and fugitive dust from project construction may pose environmental and human health risks and should be minimized. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer term exposure may worsen heart and lung disease.¹ We recommend USGS consider the following protective measures and commit to applicable measures in the Final EIS.

005-37 **Mobile and Stationary Source Diesel Controls**
Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment to meet the following standards.

- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).²
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).³
- Marine Vessels: Marine vessels hauling materials for infrastructure projects should meet, or exceed, the latest EPA exhaust emissions standards for marine compression-ignition engines (e.g., Tier 4 for Category 1 & 2 vessels, and Tier 3 for Category 3 vessels).⁴
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

005-38 Consider requiring the following best practices through the construction contracting or oversight process:

- Establish and enforce a clear anti-idling policy for the construction site.
- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer’s recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).
- Where possible, retrofit older-tier or Tier 0 nonroad engines with an exhaust filtration device before it enters the construction site to capture diesel particulate matter.
- Replace the engines of older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric vehicles,

battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.), or with zero emissions electric systems. Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary removal from use and the marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest EPA exhaust emissions standards, or with zero emissions electric vehicles and/or equipment.

005-39 **Fugitive Dust Source Controls**

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- 005-40 • Install wind fencing and phase grading operations where appropriate and operate water trucks for stabilization of surfaces under windy conditions.
- 005-41 • When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

005-42 **Occupational Health**

- 005-42 • Reduce exposure through work practices and training, such as maintaining filtration devices and training diesel-equipment operators to perform routine inspections.
- 005-43 • Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.
- 005-44 • Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators’ exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- 005-45 • Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on the type of work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a National Institute for Occupational Safety and Health approval number.

005-46 **NEPA Documentation**

- 005-46 • Per Executive Order 13045 on Children’s Health⁵, EPA recommends the lead agency and project proponent pay particular attention to worksite proximity to places where children live, learn, and play, such as homes, schools, and playgrounds. Construction emission reduction measures should be strictly implemented near these locations in order to be protective of children’s health.
- 005-47 • Specify how impacts to sensitive receptors, such as children, elderly, and the infirm will be minimized. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

¹ Benbrahim-Tallaa, L, Baan, RA, Grosse, Y, Lauby-Secretan, B, El Ghissassi, F, Bouvard, V, Guha, N, Loomis, D, Straif, K & International Agency for Research on Cancer Monograph Working Group (2012). Carcinogenicity of diesel-engine and gasoline-engine exhausts and some nitroarenes. *The Lancet. Oncology*, vol. 13, no. 7, pp. 663-4. Accessed online from: https://kclpure.kcl.ac.uk/portal/files/6492297/coverBenbrahim_Tallaa_2012_Lancet_Oncology.pdf

² <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-heavy-duty-highway-engines-and-vehicles>

³ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-nonroad-engines-and-vehicles>

⁴ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-nonroad-engines-and-vehicles>

⁵ Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Also, children’s normal activities, such as putting their hands in their mouths or playing on the ground, can result in higher exposures to contaminants as compared with adults. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed, and their growing organs are more easily harmed. EPA views childhood as a sequence of life stages, from conception through fetal development, infancy, and adolescence.

Response to Krystle McClain, July 11, 2024 (Submission 005)

005-1

The USGS acknowledges and appreciates the EPA's comments and guidance regarding the proposed development of an updated facility for the National Wildlife Health Center. Responses to comments are included in an appendix to the FEIS. The USGS's responses to EPA's detailed comments indicate where changes were made in the FEIS in response to an EPA recommendation.

005-2

The USGS will notify EPA as requested once the FEIS is published.

005-3

The USGS's Preferred Alternative includes facility components and systems that would meet the sustainability and energy efficiency requirements of EO 14057, Catalyzing Clean Energy Industries and Jobs through Federal Sustainability. These components and systems are described in Section 2.3.2.3 and Chapter 5, Mitigation Commitments, in the FEIS. The USGS has reviewed recommendations from agencies and members of the public regarding additional measures and is taking these under consideration.

005-4

As the planning and design processes for the new NWHC advance, the USGS would follow "Guiding Principles for Sustainable Federal Buildings" with the intent to qualify as a sustainable federal building under the guidance.

005-5

The new NWHC would be designed in accordance with the "Guiding Principles for Sustainable Federal Buildings" and E.O. 14057 (Decarbonization and Electrification of Facilities). In addition to an onsite photovoltaic array and use of geothermal technologies, other sustainability, resiliency, and green technologies to be considered in NWHC design and construction include the following: - Simultaneous heat recovery chillers - Energy recovery wheels on the office air handling units - Chilled beams in offices and select lab spaces - Exhaust air energy recovery - Atomizing humidification, coupled with low temperature heat source (GSHP) - High-performance envelope components including triple pane glazing and additional roof and wall insulation - Ground source heating and cooling system, with ~220 vertical bores connected to water-to-water heat pumps serving cooling and heating demands - Water reclaim and reuse system - All-electric space heating and domestic water heating systems- Backup air-cooled chillers and natural gas boilers provided for the GSHP system, a redundant electrical utility source, and onsite emergency electric generators - Mass timber construction for lower embodied carbon. The USGS cannot commit to use of sustainability, resiliency, and green technologies until it can fully evaluate the benefits and feasibility of these strategies and determine which, if any, would be included in the new NWHC design.

005-6

The new NWHC facilities would include a stormwater collection system consisting of storm sewer piping and inlets, a bioretention basin, and rainwater harvesting tanks. Stormwater runoff not captured in the bioretention basin or rainwater harvesting tanks would be directed to a localized depression in the southern portion of the property and allowed to infiltrate. These measures would keep stormwater runoff on the NWHC property, consistent with current conditions, as described in Section 3.6 of the FEIS. By keeping all stormwater runoff within the NWHC property, permeable pavement or porous pavers would be unnecessary.

Response to Krystle McClain, July 11, 2024 (Submission 005) - Continued

005-7

As noted in Section 3.10.2 of the FEIS, the lighting plan for the new NWHC under the Preferred Alternative is expected to include measures to limit unwanted light using fixtures that conceal the light source above the rim of the fixture, providing maximum downlighting while minimizing upward dispersal of light to the night-time sky. The USGS would review the proposed lighting plan to ensure selection of fixtures and their locations provide the necessary illumination where needed while being energy efficient and minimizing potential adverse effects. Mitigation measures to address the potential impacts of lighting have been added to Chapter 5, Mitigation Commitments, in the FEIS.

005-8

The USGS has reviewed the Construction Emission Control Checklist provided by EPA and included applicable measures in Chapter 5, Mitigation Commitments, in the FEIS.

005-9

Section 3.7.2 of the FEIS describes revegetation of temporarily disturbed areas following construction. Portions of the north and south prairie areas that would be disturbed during construction would be restored by removal of invasive species and revegetated with native prairie vegetation or lower-growing native grasses in areas under the proposed PV panels. The majority of the south prairie area would be restored following construction and maintained to provide native habitat for wildlife, allow for stormwater infiltration, and provide for recreational use of the walking trails through this area. Other temporarily disturbed portions of the property would be revegetated with native species and would be mowed during operation of the new facilities. Section 2.3.2 of the FEIS has been updated to describe the revegetation and habitat restoration that are included in the Preferred Alternative, and these habitat restoration measures have been included in Chapter 5, Mitigation Commitments.

005-10

The Preferred Alternative includes a stormwater collection system consisting of storm sewer piping and inlets, a bioretention basin, and rainwater harvesting tanks. Stormwater runoff not captured in the bioretention basin or rainwater harvesting tanks would be directed to a localized depression in the southern portion of the property and allowed to infiltrate. These measures would keep stormwater runoff on the NWHC property, consistent with current conditions, as described in Section 3.6 of the FEIS.

005-11

The USGS acknowledges the importance of milkweed plants to the life cycle of monarch butterflies (candidate for listing). Field surveys have found that the understory throughout the NWHC property has been overwhelmed by invasive plants that have virtually eliminated native plant species. An earlier prairie restoration plan for the NWHC property (1984) included milkweed species as part of the recommended plant mix; however, herbaceous species like milkweed were noted to be infrequent and scattered on the property during more recent surveys. As part of the NWHC development, rather than transplanting individual milkweed plants that may be present within the area of disturbance, the USGS commits to including milkweed species native to Wisconsin in the seed mix for the prairie habitat to be restored through invasive plant removal and revegetation with native prairie species, as well as installing live milkweed plants/roots to provide habitat for monarch butterflies, as outlined in Chapter 5, Mitigation Commitments, in the FEIS.

Response to Krystle McClain, July 11, 2024 (Submission 005) - Continued

005-12

All temporary and permanent restoration would utilize native plant species. Section 3.7.2 of the FEIS describes revegetation of temporarily disturbed areas following construction. Portions of the north and south prairie areas that would be disturbed during construction would be restored by removal of invasive species and revegetated with native prairie vegetation or lower-growing native grasses in areas under the proposed PV panels. The majority of the south prairie area would be restored following construction and maintained to provide native habitat for wildlife. Other temporarily disturbed portions of the property would be revegetated with native species and would be maintained during operation of the new facilities. Section 2.3.2 of the FEIS has been updated to describe the revegetation and habitat restoration that are included in the Preferred Alternative, and these habitat restoration measures have been included in Chapter 5, Mitigation Commitments. Each summer and fall, Dane County Parks collects seeds from hundreds of native plant species from prairies, oak savannas, wetlands, and woodland ecosystems and shares native seeds upon request with County Parks volunteers, friends groups, and partners for use on protected public lands. The USGS would contact Dane County Parks to discuss use of seeds as part of the prairie restoration effort. This provision has been included in Chapter 5, Mitigation Commitments.

005-13

As the planning and design processes advance, the USGS would specify the use of native or adapted trees, shrubs, and flowering plants in landscape plans. The removal and control of invasive plants would also be addressed by specifying use of BMPs to avoid the spread or introduction of invasive plants during construction and by revegetating with native species areas to remain undeveloped following construction. While landscape plans would include new native trees to replace a portion of those lost to development, the USGS cannot commit to one-for-one replacement at this early stage of the project. These measures have been included in Chapter 5, Mitigation Commitments.

005-14

The new NWHC would be designed in accordance with the "Guiding Principles for Sustainable Federal Buildings" and E.O.14057 (Decarbonization and Electrification of Facilities) and would include an onsite photovoltaic array and use of geothermal technologies. Other sustainability, resiliency, and green technologies to be considered in NWHC design and construction include the following: - Simultaneous heat recovery chillers - Energy recovery wheels on the office air handling units - Chilled beams in offices and select lab spaces - Exhaust air energy recovery - Atomizing humidification, coupled with low temperature heat source (GSHP) - High-performance envelope components including triple pane glazing and additional roof and wall insulation - Ground source heating and cooling system, with ~220 vertical bores connected to water-to-water heat pumps serving cooling and heating demands - Water reclaim and reuse system - All-electric space heating and domestic water heating systems - Backup air-cooled chillers and natural gas boilers provided for the GSHP system, a redundant electrical utility source, and onsite emergency electric generators - Mass timber construction for lower embodied carbon. Prior to specifying use of sustainability, resiliency, and green technologies, the USGS would evaluate the benefits and feasibility of these strategies and determine which, if any, would be included in the new NWHC design.

005-15

Plans for the new NWHC include installation of the necessary infrastructure and electric vehicle supply equipment to support a fully electric fleet, consistent with the agency's mission, facility security, and technical feasibility. At this time, USGS is proposing installation of electric charging stations with 12 parking spaces to be equipped with duplex charging outlets for use by staff, visitors, and government vehicles. The USGS would also continue encouraging use of car and vanpools, public transit, and other travel modes amongst the NWHC staff (see Section 3.20.3, Recommended Mitigation –Operation Phase). Designating priority parking spaces for carpools and low emission vehicles would be evaluated as the planning and design processes advance.

Response to Krystle McClain, July 11, 2024 (Submission 005) - Continued

005-16

New USGS construction and modernization projects such as the proposed NWHC are required to include measures to reduce and divert construction and demolition debris from treatment and disposal facilities, landfills, and combustion and incineration facilities (E.O. 14057 Implementation Instructions). Therefore, construction contractors would be directed to minimize solid waste disposal by separating materials suitable for recycling and diverting those materials to permitted recycling facilities in accordance with E.O. 14057 and E.O. 13834 (Efficient Federal Operations). Construction contractors would also be required to properly store construction-derived wastes and recyclables in separate dumpsters until removal with such wastes taken to facilities approved to accept construction and demolition wastes for recycling or disposal. The recommendation to replace raw materials with recycled materials for infrastructure components would be evaluated insofar as availability, applicability to the project, and costs and benefits as the planning and design processes advance. The recommendation is included in Section 3.18.3 and Chapter 5, Mitigation Commitments, of the FEIS.

005-17

The language "disproportionately high and adverse" has been revised to "disproportionate and adverse" throughout the FEIS. As EPA notes in the comment, these phrases have the same meaning, and this revision does not change the conclusions of the environmental justice analysis.

005-18

Specific mitigation measures that would minimize construction impacts on neighboring property owners and residents, including communities with environmental justice concerns, are included in Chapter 5, Mitigation Commitments, in the FEIS.

005-19

To develop the new NWHC as envisioned while maintaining operation of the existing facilities, limiting encroachment upon the prairie and forested areas, installing the planned geothermal system, and other proposed improvements would require placement of a portion of the photovoltaic array within the ice fall zone. The choice to do so was made recognizing that the photovoltaic panels would be susceptible to damage; however, the benefits to having the additional photovoltaic panels outweigh the potential for occasional damage. The risks to human health and safety would also be far less than placing the new NWHC, parking lots, and pedestrian walkways within the ice fall zone.

005-20

The USGS would specify the use of native or adapted trees in landscape plans to compensate for the proposed onsite tree removals (see Section 3.7.3 and Chapter 5, Mitigation Commitments).

005-21

Communications between the USGS and Tribal Historic Preservation Officers (THPOs) during the National Environmental Policy Act (NEPA) process has been added to Section 3.8.1 of the FEIS. Copies of correspondence received are also included in Appendix D. The USGS has reached out to Tribal Nations throughout the NEPA process to provide updates on the EIS and invite feedback and would continue to invite feedback and government-to-government consultation during implementation of the selected alternative. Mitigation measures identified through consultation and outreach, such as notification of a THPO in the event of an unanticipated discovery during construction, have been added to Chapter 5, Mitigation Commitments, in the FEIS.

Response to Krystle McClain, July 11, 2024 (Submission 005) - Continued

005-22

In compliance with the NEPA and Section 106 of the National Historic Preservation Act (NHPA), the USGS conducted cultural resource investigations and published its findings in the DEIS. The USGS also consulted with the Wisconsin Historical Society and 16 Native American tribes among other organizations and stakeholders during DEIS preparation. While no National Register-eligible resources were identified, the potential exists, albeit low, for impacts to occur to unanticipated, intact cultural resources as a result of NWHC development. To avoid interrupting, delaying, or halting construction once started, an Inadvertent Discovery Plan would be developed prior to initiating ground-disturbing activities. This plan would describe the procedures, protocols, responsibilities, and requirements of the USGS and the construction contractors in the event of a discovery. The plan would include measures to address unanticipated discoveries of cultural resources and artifacts or human remains, funerary objects, sacred objects, and objects of cultural patrimony as regulated by the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) and its implementing regulations (43 CFR §10), in consultation with the State Historic Preservation Office, Tribal consulting parties, and local authorities, as appropriate. The plan would be made available to work crews during all phases of construction that involve ground-disturbing activities. The USGS would continue to consult with Tribes who requested to be consulting parties in the event of an inadvertent discovery of archaeological materials or human remains or cultural items falling under NAGPRA during implementation of the selected alternative.

005-23

Chapter 5, Mitigation Commitments, has been added to the FEIS and includes all mitigation measures that would be implemented if the Preferred Alternative is selected.

005-24

As discussed in Section 2.2.3 of the FEIS, the site for the Preferred Alternative was selected partially to take advantage of more favorable topographic conditions and avoids shallow bedrock and steeper slopes in the northern part of the property. In contrast to the northern site that was considered during the development of alternatives, construction on the Preferred Alternative site would not require extending utilities and the access driveway to the new facility. Construction of the Preferred Alternative would retain the southern prairie area, where stormwater runoff from impervious surfaces on the property infiltrates into the ground.

005-25

Section 3.7.2 of the FEIS describes revegetation of temporarily disturbed areas following construction. Portions of the north and south prairie areas that would be disturbed during construction would be restored by removal of invasive species and revegetated with native prairie vegetation or lower-growing native grasses in areas under the proposed PV panels. The majority of the south prairie area would be restored following construction and maintained to provide native habitat for wildlife. Other temporarily disturbed portions of the property outside of the restored prairies and wooded areas would be revegetated with native species and maintained during operation of the new facilities. Section 2.3.2 of the FEIS has been updated to describe the revegetation and habitat restoration that are included in the Preferred Alternative, and these habitat restoration measures have been included in Chapter 5, Mitigation Commitments.

005-26

Erosion control measures including use of hydroseeding, erosion matting, and/or other alternatives would be evaluated insofar as effectiveness, applicability to site conditions, potential impacts to wildlife, and costs and benefits as the planning and design processes advance. During that time, a soil erosion and sediment control plan (noted in Chapter 5, Mitigation Commitments) would be prepared with the USGS ensuring that appropriate soil erosion and sediment control measures defined in the plan are implemented prior to initiating construction. If erosion matting is to be installed, netting that contains biodegradable thread with the "leno" or "gauze" weave appears to have the least impact on snakes and would be placed in areas considered as habitat for snakes and other wildlife.

Response to Krystle McClain, July 11, 2024 (Submission 005) - Continued

005-27

The design components described in Section 3.6 of the FEIS that would capture or direct stormwater to portions of the property where water would be able to infiltrate are listed in Chapter 5, Mitigation Commitments, in the FEIS.

005-28

The US Fish and Wildlife Service-recommended conservation measures for the rusty patched bumble bee listed in EPA's comment would be employed during construction. These measures would also minimize potential impacts to the monarch butterfly and common southern flying squirrel. These measures are listed in Chapter 5, Mitigation Commitments, in the FEIS.

005-29

The US Fish and Wildlife Service-recommended conservation measures for the rusty patched bumble bee listed in EPA's comment would be employed during construction. These measures would also minimize potential impacts to the monarch butterfly. These measures are listed in Chapter 5, Mitigation Commitments, in the FEIS.

005-30

The US Fish and Wildlife Service-recommended conservation measures for the rusty patched bumble bee listed in EPA's comment would be employed during construction. These measures would also minimize potential impacts to monarch butterfly. These measures are listed in Chapter 5, Mitigation Commitments, in the FEIS.

005-31

A commitment to restore the onsite prairie areas to prevent a net loss of prairie acreage due to construction also has been added to Chapter 5. The USGS will continue to prevent or reduce the spread of invasive species in the restored prairie through annual mowing and will consider other methods as appropriate.

005-32

Bird safety in buildings is a component of sustainable "green" buildings and, as the planning and design processes move forward, the USGS's avian experts would work with designers to incorporate measures to mitigate risks to songbirds and migratory birds as a result of window strikes (e.g., bird-safe glass or film). This commitment has been added to Chapter 5, Mitigation Commitments, and Section 3.7.3 of the FEIS.

005-33

Mitigation commitments would be included in the Record of Decision.

005-34

As noted in the comment, Appendix B to the DEIS summarizes public and agency comments received during the scoping period. The USGS's responses to scoping comments were summarized in Section ES-2 of the DEIS.

005-35

All comment submissions received during public and agency review of the DEIS are included in Appendix A to the FEIS. This appendix includes a summary report of comments received, copies of the original comment submissions, coded comments, and the USGS's responses to individual comments. Comment responses note where changes or additions were made to the EIS in response to substantive comments.

005-36

Diesel emissions and fugitive dust from construction projects may pose environmental and human health risks and should be minimized. In response, the EIS includes recommended mitigation measures to be incorporated within standard operating procedures during NWHC construction activities and later building demolitions (see Section 3.20.3, Recommended Mitigation –Construction Phase and Chapter 5, Mitigation Commitments).

Response to Krystle McClain, July 11, 2024 (Submission 005) - Continued

005-37

At the time the new NWHC design and contract bidding/award processes are initiated, the USGS would consider specifying the mobile and stationary source diesel controls recommended by EPA. Note that many source controls and similar specifications are intentionally excluded from contract documents and left to the discretion of the construction contractor to allow flexibility in using equipment and personnel to accomplish the work, maintain the schedule, and control costs. Nonetheless, construction activities would comply with applicable air emission regulations including provisions of Wisconsin Administrative Code, Chapter NR 415: Control of Particulate Emissions as described in Section 3.20.3 (Recommended Mitigation –Construction Phase).

005-38

At the time the new NWHC design and contract bidding/award processes are initiated USGS would consider specifying the best practices recommended by EPA. Note that many similar specifications are intentionally excluded from contract documents and are left to the discretion of the construction contractor to allow flexibility in using equipment and personnel to accomplish the work, maintain the schedule, and control costs. Nonetheless, construction activities would comply with applicable air emission regulations including provisions of Wisconsin Administrative Code, Chapter NR 415: Control of Particulate Emissions as described in Section 3.20.3 (Recommended Mitigation –Construction Phase).

005-39

Fugitive dust from construction activities may pose environmental and human health risks and should be minimized. In response, the EIS describes mitigation measures to be incorporated within standard operating procedures during NWHC construction and later building demolitions. These measures include those recommended by EPA such as stabilizing open storage piles and disturbed areas by covering and/or periodically wetting exposed soil, material stockpiles, and other unpaved surfaces; providing adequate dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and limiting unnecessary idling of diesel-powered engines among other measures (see Section 3.20.3 Recommended Mitigation –Construction Phase and Chapter 5, Mitigation Commitments).

005-40

While the potential for fugitive dust impacts would be temporary, occurring only during ground-disturbing activities and during certain weather conditions, the USGS would evaluate the use of wind fencing and phased grading operations during the new NWHC design process to minimize fugitive dust as recommended by EPA. The DEIS incorporates recommendations of the Wisconsin Department of Natural Resources to minimize air quality impacts including consideration of separate phases of construction to minimize the number of dust-generating activities, locating potential dust-generating equipment and material stockpiles in areas of least impact, providing an adequate water source at the site prior to start-up of construction activities and during later building demolition to periodically wetting exposed soil, material stockpiles, and other unpaved surfaces. Such measures would be employed where appropriate to minimize potential adverse impacts and to ensure compliance with applicable regulations (see Section 3.20.3 Recommended Mitigation - Construction Phase and Chapter 5, Mitigation Commitments).

005-41

The small area within which construction would take place would go far to limit the distance to be traveled and therefore the speed of earthmoving and non-earthmoving equipment. Nonetheless, the Project Management Plan, to be prepared by the construction contractors and approved by the USGS, would address limiting the speeds of earthmoving equipment and non-earthmoving equipment to 10 and 15 mph, respectively. This commitment has been added in Section 3.20.3 and Chapter 5, Mitigation Commitments.

005-42

The Project Management Plan, to be prepared by the construction contractors and approved by the USGS, would address the necessity to operate all equipment in accordance with manufacturer's specifications including maintaining exhaust and filtration devices and by training diesel-equipment operators to perform routine inspections. The Health and Safety Plan, to be prepared by the construction contractors and approved by the USGS, would also include this provision (see Section 3.20.2 and Chapter 5, Mitigation Commitments).

Response to Krystle McClain, July 11, 2024 (Submission 005) - Continued

005-43

The Project Management Plan, to be prepared by the construction contractors and approved by the USGS, would address the necessity to operate all equipment in accordance with the manufacturer's specifications including positioning exhaust pipes so that diesel fumes are directed away from equipment operators and nearby workers to reduce the fume concentration to which construction workers are exposed. The Health and Safety Plan, to be prepared by the construction contractors and approved by the USGS, would also include this provision. (see Section 3.20.3 and Chapter 5, Mitigation Commitments).

005-44

The Project Management Plan, to be prepared by the construction contractors and approved by the USGS, would address the necessity to use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air filters to reduce the operators' exposure to diesel fumes. The Health and Safety Plan, to be prepared by the construction contractors and approved by the USGS, would also include this provision (see Section 3.20.3 and Chapter 5, Mitigation Commitments).

005-45

The Project Management Plan, to be prepared by the construction contractors and approved by the USGS, would address the necessity to have available a sufficient number of and appropriate type(s) of respirators as an interim measure to control construction worker exposure to diesel emissions. The Health and Safety Plan, to be prepared by the construction contractors and approved by the USGS, would also include this provision (see Section 3.20.3 and Chapter 5, Mitigation Commitments).

005-46

The location of the proposed NWHC relative to adjoining and sensitive land uses and places where children live, learn, and play is an important consideration and is addressed in the EIS. The NWHC is at 6006 Schroeder Road in Madison, a location adjacent to the heavily travelled West Beltline Highway (north), residential developments (east and south), commercial developments (southwest), and the West Madison Little League baseball fields (northwest). Public and private schools in proximity include the Lighthouse Christian School (2,000 feet southwest), Madison Waldorf School (2,500 feet southwest), and La Petit Academy (2,700 feet southwest); to the south and southwest is Sherwood Forest Park (2,350 feet), Norman Clayton Park (2,800 feet), and Sunridge Park (3,050 feet). Temporary impacts resulting from fugitive dust from ground clearing, grading, the stockpiling of topsoil and other materials and the onsite operation of construction equipment are considered and addressed in the EIS. The Health and Safety Plan, to be prepared by the construction contractors and approved by the USGS, would also address emission reduction measures to be implemented in order to be protective of the health and welfare of children and others living and working in the vicinity of the NWHC. This provision has been added to Section 3.20.3 and Chapter 5, Mitigation Measures, of the FEIS.

005-47

The necessity to maintain NWHC operations and the small area to be developed limits how the property can be used during construction. The Project Management Plan, to be prepared by the construction contractors and approved by the USGS, would address the placement of construction offices, locations of construction equipment, staging areas, and material stockpiles, and other such uses and activities to avoid adversely impacting those living, working, and engaging in recreation nearby. This provision has been added to Section 3.20.3 and Chapter 5, Mitigation Measures.

Eric Johnson, June 18, 2024 (Submission 006)



Amphibian Refuge

Website: amphibianrefuge.org

11225 Morocco Road NE
Albuquerque, NM 87111

June 18, 2024

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RE: Comment on Environmental Impact Statement Updated Facility - USGS Wildlife Health Center

Dear Jordan Sizemore:

Amphibian populations are declining worldwide, and amphibians are experiencing high extinction rates due to habitat loss, chytrid fungus, pollutants, pesticides, and climate change. Amphibians are the most threatened class of vertebrates.

We support the construction of the Updated Facility for the USGS Wildlife Health Center. The Updated Facility should allow for investigation of amphibian diseases, such as the chytrid fungus and limb deformities.

The Environmental Impact Statement describes measures that will reduce environmental effects. Avoidance of wetlands and waterbodies will reduce potential effects on amphibians that occur in wetlands and waterbodies. The use of solar photovoltaic and geothermal technologies will reduce climate change effects.

Thank you for this opportunity to comment.

Eric R. Johnson

Eric R. Johnson
Executive Director

References:

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- Luedtke et al. 2023. Ongoing Declines for the World's Amphibians in the Face of Emerging Threats. *Nature*, Volume 622, 12 October 2023, 308-314.
- McCallum, M.L. 2007. Amphibian Decline or Extinction? Current Declines Dwarf Background Extinction Rate. *Journal of Herpetology*, Volume 41, Number 3, pp. 483-491.

006-1

Response to Eric Johnson, June 18, 2024 (Submission 006)

006-1

The USGS acknowledges and appreciates the comments regarding the proposed development of an updated facility for the NWHC.
