



City of Gustavus, Alaska
PO Box 1
Gustavus, Alaska 99826
Phone: 907.697.2451
Fax: 907.697.2136

April 15, 2021

Commissioner John McKinnon
Alaska Department of Transportation & Public Facilities
P.O. Box 112500
3132 Channel Drive
Juneau, AK 99811-2500
Sent via e-mail: dot.commissioner@alaska.gov

Dear Commissioner McKinnon:

The City Council of Gustavus is gravely concerned with the lack of response given to ongoing work at the Gustavus airport. As you know, Gustavus is particularly impacted by the use of Aqueous Film Forming Foam (AFFF) containing polyfluoroalkyl and perfluoroalkyl (PFAS) substances. The contamination to our drinking water has significantly changed the lives of many residents and businesses in town. I have contacted Senator Kiehl to discuss this situation, asking that he discuss our concerns with you to ensure the community of Gustavus, groundwater, and private wells are completely safeguarded from additional PFAS contamination potentially caused by DOT's airport project.

The City Council of the City of Gustavus is strongly requesting that you direct the following actions.

Issue a stop work order until the following actions have been completed:

1. Results of PFAS contamination and leachability are received with adequate time to review.
2. Appropriate project modifications are made with consultation of the City of Gustavus, Gustavus PFAS Action Committee (GPAC), and concerned citizens.
3. The project's PFAS mitigation strategy and Soil Management Plan are revised to accommodate asphalt and shared with the public with adequate opportunity for public comment. Modifications to the Soil Management Plan should include:
 - a) PFAS mitigation in all removed or disturbed materials including both soil and asphalt;
 - b) No movement of potentially contaminated material, soil or asphalt, until test results confirm that both soil and asphalt are below the State of Alaska's

- migration to groundwater cleanup level (3 ppb PFOS; .7 ppb PFOA for soils per 2019 Gustavus Site Characterization);
- c) No temporary or permanent storage of soil or asphalt on uncontaminated ground, including the cleared 18-acres;
 - d) No recycling of asphalt unless tests confirm that asphalt contains less than levels set by State of Alaska migration to groundwater cleanup standards (above);
 - e) Application of Soil Management Plan procedures to include processing of both soil and asphalt; and
 - f) Asphalt shall be treated as contaminated until proven to contain PFAS less than levels set by State of Alaska migration to groundwater cleanup standards (above).

Also acceptable would be a new Environmental Assessment or Impact Statement (EA or EIS) with appropriate public review and comment periods.

Additionally, a barrier to prevent migration of PFAS such as PlumeStop along the western edge of the airport needs to be installed to prevent migration of the PFAS. This would arrest all potential new contamination stemming from the disruption of contaminated soil, and asphalt. We fear that extensive exposure of newly disturbed contaminated asphalt and soil could further contaminate properties down gradient. Such a barrier would ensure that drinking water wells and private properties are not further damaged by airport construction.

Thank you for recognizing the need to address this situation for the safety and wellbeing of Gustavus. To be clear, it is our intent is to ensure that all of us are working together to mitigate any potential further damage, so that the airport project can proceed safely.

Sincerely,

A handwritten signature in black ink, appearing to read 'BC' followed by a long horizontal flourish.

Brittney Cannamore, Mayor

Cc: Senator Kiehl; Representative Hannan; Lance Mearig, P.E. ADOT Southcoast Region Director; Bill O'Connell, ADEC Environmental Program Manager, ADEC Contaminated Sites Program