



U.S. Department  
of Transportation

AIRPORTS DIVISION

222 W. 7th Avenue, Box 14  
Anchorage, Alaska  
99513-7587

**Federal Aviation  
Administration**

May 7, 2021

Benjamin Storey  
Regional Environmental Manager  
6860 Glacier Highway  
P.O. Box 112506  
Juneau, AK 99811-2506

Dear Mr. Storey,

I am writing to request your assistance regarding the current Gustavus Airport (GST) Apron, Runway, and Taxiway Pavement Rehabilitation Project Z-67517-0000. The FAA is requesting ADOT&PF to submit an updated CATEX request for current reevaluation of NEPA.

Because the Alaska Department of Environmental Conservation (ADEC) had not promulgated action levels for Polyfluoralkyl substances (PFAS) until 2018, documentation of considerations regarding these substances was not yet required as part of the FAA's approved CATEX decision, dated February 6, 2017.


The FAA is aware of the recent discovery of PFAS in asphalt, as well as ADOT&PF's Contaminated Materials Management Plan (CMMP) dated April 28, 2021, which is currently undertaking synthetic precipitation leaching procedure testing.

Based on these circumstances, we request supplemental information for the potential effects of the presence of PFAS on the following.

- Solid Waste Management (FAA Order 1050.1F ¶ 5.2b (4));
- Air Quality (FAA Order 1050.1F ¶ 5.2b (8));
- Water Quality (FAA Order 1050.1F ¶ 5.2b (9));
- Highly Controversial on Environmental Grounds (FAA Order 1050.1F ¶ 5.2b (10));
- Likelihood of inconsistency with any Federal, state, tribal or local law (FAA Order 1050.1F ¶ 5.2(b) (11); and
- Likelihood to directly, indirectly, or cumulatively create a significant impact on the human environment (FAA Order 1050.1F ¶ 5.2(b) (12).

If DOT&PF knows of design modifications that would avoid or minimize potential impacts to human health and the environment in response to the discovery of PFAS on the Gustavus Airport property, please provide details of those modifications for our review of potential effects to the environment.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Gilbertsen". The signature is fluid and cursive, with the first name "Jack" being the most prominent.

Jack Gilbertsen  
Lead Environmental Program Manager