

**Congress of the United States**  
Washington, DC 20510

April 20, 2021

Dr. Catharine Varley  
BRAC Environmental Coordinator  
Air Force Civil Engineer Center  
2261 Hughes Avenue, Suite 155  
JBSA Lackland, TX 78236

Dear Dr. Varley,

As members of Michigan's congressional delegation, we write to share our concerns for the record with the United States Air Force's proposed Interim Remedial Action (IRA) plan for Clark's Marsh near the former Wurtsmith Air Force base (Wurtsmith).

As you are aware, the residents of Oscoda have been subjected to harmful per- and polyfluoroalkyl substances (PFAS) in their groundwater and waterways—including at Clark's Marsh—for many years. The contamination is a result of the use of firefighting foam containing PFAS used by the Air Force at Wurtsmith. While we acknowledge the Air Force's work to initiate remediation and prepare the IRA, it is insufficient to address PFAS contamination coming from Wurtsmith and abate the imminent and substantial threats to human health and the environment from PFAS contamination in the Clark's Marsh area.

The Air Force expansion of the granular activated carbon (GAC) treatment system at the former fire training area No. 2 represents a positive step, yet additional interim actions to address PFAS contamination plumes spreading through the area are needed. This is an area directly north of the Au Sable River, where some of the most highly PFAS-contaminated fish, deer, and other aquatic and semi-aquatic wildlife in Michigan and the nation are found.

Further, multiple stakeholders have shared concerns that the Air Force plume maps and plans do not accurately represent how much contamination is actually entering Clark's Marsh from points other than No. 2, and we urge the Air Force to work with the State of Michigan to ensure adequate testing and sampling.

By choosing to focus on one narrow plume area in the IRA, we are concerned that these adjacent PFAS plumes continue to spread unabated. We urge the Air Force to ensure the number and the location of extraction wells accurately capture the entire PFAS contamination in the Clark's Marsh area. Doing so will help ensure that the continued imminent threats to human health, fish, wildlife, and the environment from PFAS contamination are addressed.

We additionally wish to register our continued frustration at the Air Force's unwillingness to utilize the groundwater criteria established by the State of Michigan as Applicable or Relevant and Appropriate Requirements (ARAR).

During its March 24<sup>th</sup> town hall meeting and a subsequent April 9<sup>th</sup> press briefing, representatives from the Air Force noted multiple times that they “will probably” comply with state law during the next phase of cleanup and that the treatment they use “does typically achieve non-detect levels” for PFAS and that they are “expecting to be below the Michigan levels when [they] install the system.” Rather than risk doing less now than what will ultimately be required, the Air Force should instead prioritize human health and meet Michigan’s state standards for addressing PFAS contamination from the start of the remediation process. This would also have the added benefit of preventing unnecessary expenditures of taxpayer money on enhancing treatment down the line.

Finally, we again urge the Air Force to commit to meaningful and substantive community engagement with Oscoda stakeholders. This includes allowing municipal or community representatives to participate in Base Realignment and Closure Cleanup Team meetings.

Thank you for your consideration.

Sincerely,



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Gary C. Peters  
United States Senator




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Debbie Stabenow  
United States Senator



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Daniel T. Kildee  
Member of Congress



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Elissa Slotkin  
Member of Congress