

MEMO



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to	<u>Joint Committee on Administrative Rules</u>	from	<u>Herasanna Richards, Michigan Municipal League</u>
cc	<u></u>	date	<u>July 22, 2020</u>
pages	<u>1</u>	subject	<u>Proposed Rule Set 2019-35G</u>

Dear Chairmen Lucido, Maddock and members of the Committee,

On behalf of the Michigan Municipal League, I would like to provide the Committee with our considerations regarding proposed rule set (2019 – 35 EG). I have attached for your reference two letters provided by MML during the stakeholder workgroups public comment period addressing our concerns. We have appreciated the opportunity to share this feedback with the Joint Committee on Administrative Rules.

As local governments, we recognize and honor our charge to ensure access to clean drinking water for all of our residents. However, with regard to this proposed rule set, we maintain our concerns that collectively, there is not sufficient data to fully illustrate the impact of these proposed rules. Municipal water systems of varying sizes have expressed that the anticipated costs of installing new technologies and treatment costs could cause a significant burden to Michigan's communities.

We have found that the models presented during the review period are not completely inclusive of the wide-variety of water systems throughout Michigan. Our members have expressed concerns that due to COVID-19, grant funding and other revenues once available to support the implementation and development of new technologies to address PFAS may no longer be sustained.

Municipal budgets have been devastated by COVID-19. Our communities are balancing revenue short-falls, delays in necessary infrastructure projects ranging from lead service line replacements, to eroding shoreline structures, and shouldered the costs of maintaining running water in accordance with the Governor's Executive Orders requiring water system maintain service to all customers.

We urge the committee to conscious of policies that will result in an unfunded mandate, run counter to existing asset management planning and unintentionally hinder the overall quality of services our communities are able to provide.

Respectfully,

Herasanna Richards
Michigan Municipal League

