

To the Department of Energy, Great Lakes and Environment:

Thank you for the opportunity to provide comment on proposed rule set (2019 – 35 EG). Over the past 10 months, in coordination with EGLE, MPART, the Science Advisory Workgroup, and participating stakeholders, the Michigan Municipal League has worked to better understand and address PFAS contamination in Michigan. Delivering affordable, clean, quality drinking water to our residents is of utmost importance to Michigan’s communities. It is a charge and responsibility that we take with tremendous care, and we are immensely proud of the many communities throughout Michigan that have already taken independent steps to mitigate existing PFAS contamination within their respective water supplies.

As we continue to discuss the adoption and implementation of these rules, we hope you recognize our communities are still learning how to address the financial costs of contamination and cleanup. Many communities, especially Michigan’s smaller cities and villages, will require substantial new investment in new treatment technologies, sampling, staffing and more – many of which that can be estimated, and others that are unknown.

While it is helpful the state has provided cost estimates for implementation and utilization of effective treatment techniques, there are still many other costs and steps needed down the road that are not that are not entirely covered in Regulatory Impact Statement. We believe that an in depth conversation to address and understand the costs to communities and their ratepayers is still necessary. PFAS is still an emerging contaminate, and as our knowledge develops, we must remain aware that flexibility will be required to make this an achievable expectation for our local water suppliers.

The League looks forward to continuing our work as a cooperative partner in this process. We appreciate the opportunity to work in partnership to provide quality, accessible drinking water, balanced with effective asset management for the residents of Michigan.

Respectfully,

The Michigan Municipal League

