Dear Chairman Nederhood and members of the Environmental Rules Review Committee:

Thank you for the opportunity to speak with you today. On behalf of the Michigan Municipal League we would like to thank EGLE for their work to facilitate a cooperative, engaging and transparent process for all stakeholder groups participating in this process. Our membership was able to provide answers to open-ended questions addressing best treatment techniques, accessibility of laboratory testing, timeline considerations, necessary training certifications and more. Based on the dialogue during the listening session and the final product, it is evident EGLE has done their best incorporate much of the feedback that was provided by all those at the table.

Over the past 10 months, in coordination with this body, EGLE, MPART, the Science Advisory Workgroup, and participating stakeholders, we have made significant strides in understanding and addressing PFAS contamination in Michigan. In addition, several of our member communities have already independently taken significant steps to mitigate existing PFAS contamination within their respective water supplies.

This type of collaboration is critical, and we hope that intention continues beyond the rule-making process.

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. As you consider these rules, we hope you recognize our communities must still navigate how to address the costs of contamination and cleanup. Many communities, especially our smaller cities and villages, will require substantial 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 included in these estimates. Thus far, nothing has directly addressed the costs to communities and their ratepayers. PFAS is still an emerging contaminate, and as our knowledge on these contaminates develops, we must remain cognizant to the flexibility that will be required to make this an achievable expectation for our communities. As we continue this process, The League will be as a cooperative partner to address these concerns, and we look forward to continuing the conversation.

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