

Date: August 18, 2021

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Sent by email to Jason Knutson ( [DNR105PFASRule@wisconsin.gov](mailto:DNR105PFASRule@wisconsin.gov) )

Subject: Comments regarding EIA of Board Order WY-23-19

Please accept these comments on the EIA of Board Order WY-23-19 on behalf of the League of Women Voters of the La Crosse Area. The League of Women Voters has been a strong supporter of protection of natural resources and public health and has supported the regulation of pollution sources to minimize damage to these resources.

In the draft EIA, DNR proposes that entities affected by this new rule focus on the reduction of the source of PFAS compounds in the effluent as a first step toward meeting the new surface water standards (rather than treatment). This is the most cost-effective approach and avoids the problem of disposing contaminated treatment equipment. Given that premise, the draft EIA therefore consists of an estimate of the cost to publicly owned treatment works, industry, and businesses that includes the cost of sampling and the cost of a PFAS Minimization Plan. The League is highly supportive of this approach.

However, the draft EIA does not include an estimate of the benefits of the proposed rule to those throughout the state who may otherwise be negatively impacted by these chemicals. It only briefly mentions some possible benefits.

A major benefit of the proposed rule is the protection of public health. The prevention of negative health effects caused by the ingestion of contaminated drinking water from municipal water systems is a major benefit. If avoided, the cost savings to communities for not having to provide an alternative water source such as bottled water, is another benefit. Secondary benefits include improved lake and stream water quality and protection of the biosphere. Lastly, the economic benefits from maintaining Wisconsin's tourism/recreation industry by protecting fish and game as well as the health benefits for residents for whom fish are an important source of food should be recognized.

Both the costs and the benefits are not easily estimated. Based on the information included in the draft EIA, a rough estimate suggests that the costs for rule implementation are relatively low on a per-person basis. Given the significant costs now faced by residents in the La Crosse area with substantive PFAS contamination, the costs for pollution prevention at the source are miniscule compared to the costs of providing a clean water source, future health issues, and long-term impacts to the ecosystem and future generations. The League of Women Voters of the La Crosse Area is therefore in support of implementing the new surface water quality criteria, Board Order WY-23-19.

Thank you for your consideration.

Robin Schmidt, President  
League of Women Voters of the La Crosse Area