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October 11, 2023

Michael S. Regan, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Regan:

On behalf of the Local Government Advisory Committee (LGAC), I am pleased to deliver our recommendations to the U.S. EPA regarding how we may most effectively communicate the risks of PFAS to the public as we work to keep our local communities safe and healthy.

The LGAC was asked to pull from our experiences and institutional knowledge to inform EPA how it can support local and state governments with the risk communications needed when PFAS is detected in a community. The LGAC and the Small Communities Advisory Subcommittee (SCAS) thoroughly addressed this request by conducting a table-top exercise, engaging with EPA's Office of Public Affairs and Office of Water, and conducting various workgroup meetings to best respond to the charge and to develop the set of recommendations that we are sharing with you.

Recognizing that PFAS contamination is an issue of national scope and concern, the LGAC recommends that EPA develop comprehensive solutions that will benefit all local communities. Specifically, the LGAC recommends that EPA:

- Develop a PFAS Toolkit that can be readily adapted by local governments for use in their local contexts,
- Act as a convener and facilitator for regional coalitions, states, and local governments to help ensure that the risks of PFAS are accurately and effectively communicated to the public, and
- Hold manufacturers of PFAS chemicals accountable such that financial assistance is granted to local governments, ensuring they have appropriate resources to mitigate and clean up PFAS contamination.

We thank the Agency for this opportunity to engage on this important matter and look forward to working collaboratively with our partners in local, state, and federal government to best protect our residents from the risks posed by PFAS.

Sincerely,


Mayor Leirion Gaylor Baird
LGAC Chair

LGAC Recommendations on PFAS Risk Communication

EPA has tasked the Local Government Advisory Committee (LGAC) to pull from its institutional knowledge and inform ways that EPA can support local and state governments communication the risk of PFAS. Specifically, the LGAC's PFAS Risk Communications Workgroup was asked to provide a local perspective on what happens when PFAS is detected and how can EPA support this work to position a community for effective engagement with local residents while balancing the initial management of PFAS contamination. Additionally, workgroup members were asked if there are specific tools that EPA should develop, local examples of best practices, and/or lessons learned that EPA should consider adopting, and lastly ways that EPA can support effective partnerships of local, state, and federal governments on the issue of PFAS. The subsequent paragraphs respond to this call for information as the first step to build a set of collaborative solutions locally and federally to address this national issue. However, a missing, yet critical component to these solutions involves state collaboration. Although the LGAC is mainly comprised of locally elected officials, members of the LGAC look forward to building a tier set of solutions amongst local, state, and federal partners to mitigate the occurrence of longstanding PFAS and prevent any future use of these chemicals.

Local governments are on the frontline for their constituents. Policies established at federal and state levels, which in turn are implemented locally, require local officials to be prepared and fully equipped with a clear communication strategy for their residents. As the detection of PFAS is increasing nationwide, members of the LGAC call upon EPA to help local governments communicate the risk once PFAS is identified and detected in a community.

The LGAC appreciates EPA being a leading agency dedicated to tackling the devastating effects of PFAS in human health and the environment. We value the agency's commitment to provide meaningful, understandable, and actionable information on PFAS and understand the set of nuances that results in chemicals that continues to be researched to efficiently detect and measure its prevalence. Local governments are looking to EPA to provide support, specifically with risk communications, when PFAS is identified.

Building upon the LGAC's 2020 recommendations to EPA on the overall topic of risk communications along with a more recent series of workgroup discussions and a table-top exercise demonstrating a scenario of PFAS detection, **the LGAC recommends EPA to develop a PFAS Toolkit adoptable for local governments.** Components within this toolkit should include a table-top exercise, comprehensive messaging kits, standardized talking points, message maps, and FAQ's. Another key component to this toolkit will be communication templates. These templates can offer scenarios when testing for PFAS is over and/or below the regulatory threshold. Having this information will allow local governments to access the most up to date data that can be shared with their constituents. The messaging kits and communication templates will assist local officials to communicate 1) PFAS and what it entails, 2) it's place of origin and where it's likely to be found, 3) the risk of PFAS once exposed, 4) outline the mitigating factors of PFAS, 5) describe the corrective actions to ensure public water systems continue to provide healthy water, and 6) federal actions taken to address PFAS. The toolkit can also include information on actionable steps for communities and individuals to take to reduce the use and exposure of PFAS, information on laboratory testing, factual publications on PFAS, and PFAS visuals, graphs, and charts.

In regard to EPA supporting effective partnerships of local, state and federal governments on the issue of PFAS, **the LGAC recommends that EPA acts as a convener and facilitator for regional coalitions, states and local jurisdictions to ensure that the risks of PFAS is factually communicated to the public.**

Once PFAS is identified, all levels of government will need to organize and determine how to communicate the problem to residents. EPA can be a reliable expert and trusted voice for state and local governments to communicate the risks of PFAS. Since the occurrence of PFAS is a national issue, utilizing EPA as the federal entity to help facilitate solutions, and provide funding and technical assistance is critical.

Finally, we appreciate EPA bringing the proposed PFAS National Drinking Water Regulation to the LGAC with the opportunity to provide recommendations ahead of its finalization. Although we've offered our input to the proposal, it should be emphasized throughout all discussions involving PFAS the financial cost to address the issue. **The LGAC recommends that EPA hold manufacturers of PFAS chemicals accountable and ensure that financial assistance is granted to local governments to ensure appropriate resources are available to mitigate and clean up the contamination.** EPA's analysis on the cost for regulating PFAS in public drinking water systems is significantly low, however according to a study conducted by Black & Veatch on the PFAS cost model on behalf of the American Water Works Association (AWWA) estimated the national cost for water systems to install treatment to remove PFOA and PFOS to levels required by EPA's proposal exceeds \$3.8 billion annually*. This increase in cost for water treatment systems should not be charged to ratepayers. Federal funding needs to be made available that allow local governments to treat and prevent PFAS from public and private drinking systems, especially in small and disadvantaged communities.

We look forward to the continued collaboration between EPA and the LGAC as we address the issue of PFAS keeping in mind the protection of public health for our residents and the environment.

*source: [New Proposed EPA Regulations on PFAS: What Water Utilities Need to Know.](#)