



# WISCONSIN LAKES

*We Speak for Lakes!*

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November 19, 2019

WI Dept. of Natural Resources  
ATTN: Adam DeWeese  
Bruce Rheineck  
Meghan Williams  
PO Box 7921  
101 S Webster St  
Madison WI 53707-7921

SUBMITTED VIA EMAIL

Re: Proposed PFAS Rulemaking Scope Statements

- Statement of Scope 089-19, Rule No. DG-24-19 relating to maximum contaminant levels (MCLs) for drinking water
- Statement of Scope 090-19, Rule No. DG-15-19 relating to groundwater standards for PFAS
- Statement of Scope 091-19, Rule No. WY-23-19 relating to surface water quality standards for PFAS

Dear Mr. DeWeese, Mr. Rheineck, and Ms. Williams,

Thank you for the opportunity to submit comments regarding the scope statements for the rulemakings regarding the establishment of rules and standards for PFAS in surface, ground, and drinking water. Wisconsin Lakes strongly supports each scope statement and urges the agency to undertake this important rulemaking that is crucial to the safety of all Wisconsin's waters.

Wisconsin Lakes is a statewide non-profit conservation organization of waterfront property owners, lake users, lake associations, and lake districts who in turn represent over 80,000 citizens and property owners, serving as the statewide association of lake associations and districts.

*General support for all three rulemakings*

The members of Wisconsin Lakes are deeply concerned about the emerging evidence regarding poly-and perfluoroalkyl substances (PFAS) both in regards to the danger they pose to humans as well as the rising number of incidences where they are being found in our waters. Because Wisconsin does not have standards or rules related to these chemicals we believe it to be reasonable, proper, and urgent that WDNR undertake these three rulemakings. We submit our comments on each rulemaking as one document to acknowledge that each rule is interrelated

*Wisconsin Lakes is a statewide non-profit conservation organization of waterfront property owners, lake users, lake associations, and lake districts who in turn represent over 80,000 citizens and property owners. For over 20 years, Wisconsin Lakes has been a powerful bipartisan advocate for the conservation, protection, and restoration of Wisconsin's lake resources.*

to the others. Failure to advance all three rules would severely hamper the state's efforts to protect the public from PFAS contamination.

*Rule WY-23-19, Statement of Scope 091-19 (Surface Water Quality Standard for PFAS)*

The members of Wisconsin Lakes through the 600 plus lake organizations in the state have worked tirelessly to protect and restore their lakes from water quality problems caused by phosphorus and other pollutants. They now recognize an emerging, largely unseen, and particularly dangerous threat in PFAS. Because of its tendency to bio-accumulate, it threatens the safety of Wisconsin's fisheries, and these chemicals impact recreational interests as well. Establishing a surface water standard for PFAS is crucial to protect wildlife, fisheries, and ourselves.

*Rule DG-24-10, Statement of Scope 089-19 (Max Contaminant Levels for Drinking Water)*

The members of Wisconsin Lakes believe all Wisconsinites and visitors to Wisconsin deserve access to clean, safe drinking water, be it from a municipal source or private well. PFAS testing needs to be conducted and clean ups need to occur where warranted. Setting MCLs for PFAS is a step in that direction and needs to happen as quickly as possible.

*Rule DG-15-19, Statement of Scope 090-19 (Groundwater Standards for PFAS)*

The members of Wisconsin Lakes understand that groundwater is often directly connected to surface waters and the frequent source of our drinking water. The Department of Health Services already recommends a groundwater standard of 20 ppt for PFAS and WI Lakes urges DNR to implement and enforce this standard. A groundwater standard is inextricably linked to the protection of surface and drinking water and ensuring both are clean and safe for consumption and use.

For the reasons stated above, Wisconsin Lakes urges the acceptance of all three Statements of Scope and for the agency to pursue all due haste in passing and implementing these rules for the health, safety, and welfare of us all.