

April 27, 2021

City of Madison Mayor's Office
210 Martin Luther King Jr Blvd, Room 403
Madison, WI 53703

To: Mayor Satya Rhodes-Conway
Members of the Madison Common Council

Re: Recommendations for the City to address PFAS contamination and associated health risks

This letter provides recommendations for the City to address the serious [health problems](#) posed by PFAS contamination in our community. These dangerous chemicals are continuously being released from sources at the Dane County airport into our drinking and surface waters, as well as accumulating at very high levels in fish. Members of the community rely on the City to ensure the safety of their tap water. Beyond regular consumption by residents, this water is also being consumed by our youngest populations: in children's sippy cups, for mixing with infant powdered formula, and it is concentrated in breastmilk. Many people no longer feel safe consuming tap water and have resorted to bottled water. And many subsistence anglers are regularly feeding highly contaminated fish to their families. This is unacceptable.

The SMC sent a letter last year responding to the F-35 basing at Truax and offered our concerns then for the growing PFAS problems.

In July 2018, the DNR notified the City, Dane County and Air National Guard (ANG) of their responsibility to investigate and remediate PFAS at the airport. While the County and ANG have done limited actions towards measuring the problem and seeking solutions, PFAS continue to pollute our community at very high levels.

The results from recent testing are staggering and demand attention. The DNR and State Health Department have recommended 20ppt as the limit for PFOS and PFAS in drinking water. Some limited testing done a few years ago found PFAS levels up to 46,000 parts per trillion (ppt) in airbase soils and groundwater. This amount eclipses the recently-proposed Wisconsin standard of 20 ppt. Late last year, the DNR found that water in Starkweather Creek had 400 ppt of the PFOS compound. Foam collected near the Olbrich Park boat launch had between 80,000 and 90,000 ppt. This January, fish tested in Lake Monona had PFAS concentrations of 110,000 ppt and fish in Starkweather Creek had up to 180,000 ppt. Recent data released by DNR revealed PFAS have spread throughout the lower Yahara lake system.

This creates an alarming environmental justice issue. Low-income and subsistence households use locally-caught fish as a food source. Maria Powell, executive director of the Midwest Environmental Justice Organization, argues studies indicating the amount of recreationally harvested fish lacks a proper representation of people of color and

subsistence anglers. Low-income households likely rely on fish due to food insecurity. Public Health Madison Dane County data indicates food insecurity predominately impacts Hispanic and African-American groups. Sadly, food insecurity impacts children's education and psychological well-being, and adults' health and quality of life. Worries about contaminated food sources in addition to nutrition concerns exacerbate this injustice.

On January 21, 2021, the DNR again sent letters to the responsible parties, this time requiring they submit written remedial action plans by April 16, 2021.

The ANG recently announced plans to begin construction for F-35 facilities. With very shallow groundwater levels at Truax, any construction will require soil movement and continuous site dewatering, which would likely spread more PFAS into Starkweather Creek and our lake system. We stand opposed to the F-35s because of these concerns as well as other factors (see [SMC's statement](#) on November 4, 2019).

We are also very concerned that our community members have not been kept informed of the breadth of the PFAS problems or actions to address them. A year ago a public meeting was planned, but that meeting never occurred. Affected communities living along the creek or relying on fish for food have limited access to the DNR, Public Health Madison Dane County, and airport websites.

There is also growing concern that PFAS-contaminated materials from Madison Metropolitan Sewerage District spread on agricultural fields are providing another path for PFAS exposure.

We ask the City to take these actions immediately to address the PFAS problems:

- [Revive the PFAS Task Force](#) (Legistar #54777) proposed in 2019 to enhance cooperative actions among responsible parties. This task force should include representation from the City, County, Air National Guard, Public Health Madison Dane County, and Madison Metropolitan Sewerage District, as well as citizens. Its goals should be to determine all sources of PFAS at the airport, advocating to stop their continuous releases and remove them to levels set by DNR.
- Create transparent and understandable communications to the public about PFAS dangers and clean-up efforts. The communications should be mixed mode and at minimum need to include regular public meetings, provide thorough access to online updates, and request the DNR to also hold public meetings.
- Conduct a health impact assessment to evaluate health risks posed to those eating contaminated fish and find remedies to eliminate the risk, as well as any risks posed by drinking or immersion in our waters. This assessment should include strategies to mitigate health impacts and enhance programs to provide alternative food sources to food-insecure subsistence anglers until PFAS reduce to safe amounts.

These actions should be considered at the highest priority for our City and we're happy to discuss ways we could be of assistance. Each day without action is compromising the safety and protection of our citizens.

Sincerely,

Jeannette LeZaks and Jessica LeClair
Sustainable Madison Committee Co-Chairs

Cc: Members of the Sustainable Madison Committee:

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