

July 24, 2019

Honorable Anne Gobi, Senate Chairwoman
Joint Committee on Environment, Natural Resources and Agriculture
State House Room 513
Boston, MA 02133

Honorable William Pignatelli, House Chairman
Joint Committee on Environment, Natural Resources and Agriculture
State House Room 473F
Boston, MA 02133

Re: Support: H. 3851 and S. 2284, An Act establishing an interagency PFAS task force

Dear Chairwoman Gobi, Chairman Pignatelli, and Honorable Committee members,

Thank you for the opportunity to submit written testimony on House 3851 and Senate 2284 to establish an interagency PFAS task force. The undersigned organizations support these bills and offer an amendment. We believe it is important to take action without delay to develop a timely and comprehensive approach to managing the threat to the health of the public and the environment due to contamination of water resources by PFAS chemicals. We ask that a representative of the environmental community and state wildlife experts be added to the task force in order to ensure that the best information is available and utilized. It is essential that wildlife be protected from PFAS contamination not simply because they are a conduit of contamination to humans (e.g., by eating fish), but because the health of wildlife and the ecosystem must be protected. It should be noted that “Environmental Risk” to biotic receptors is a specific interest under the Massachusetts Contingency Plan for cleanup of contaminated sites.

The undersigned watershed and environmental organization represent a large area of the Commonwealth. They include federally-designated Wild & Scenic Rivers, and many areas containing threatened and endangered species. Among other recent cases, PFAS contamination of groundwater was discovered in Hudson, Ayer, Shirley, and Danvers, Mass. For example, the contamination of the town of Hudson’s Cranberry Well in the Cranberry Brook wetland is of particular concern. Cranberry Brook is a state-designated Coldwater Fishery Resource and is home to wild Eastern Brook trout (*Salvelinus fontinalis*), a keystone species in the northeastern US. In eastern Massachusetts, the survival of these remaining populations is threatened by the pressures of human development. OARS has been monitoring the water and air temperature in Cranberry Brook and other streams as part of an on-going study of the impacts of temperature change on coldwater fish. OARS’ study found that the stream quality of Cranberry brook was excellent. (See: <http://www.oars3rivers.org/our-work/monitoring/trout-streams>.) However, PFAS contamination of the stream’s water could change that conclusion significantly.

We would like to emphasize that while effects on human health are very important, and are the focus of most PFAS cleanup efforts, effects on ecosystem health must also be given due consideration. Fish and other aquatic life, in particular, may get far more exposure than humans due to the fact that they would be in constant contact with contaminated water. Recent research clearly shows that PFAS compounds can bioaccumulate in fish tissue at levels that affect fish edibility. Fish Consumption Advisories due to PFAS contamination have been issued in Michigan, Minnesota, New Jersey and other states. As known or suspected carcinogens, mutagens and endocrine disruptors in humans, there is reason to believe that chemicals in the PFAS family may have similar effects on aquatic wildlife. We already know that there

are intersex fish in the Assabet and Sudbury Rivers and endocrine disruption is a cause for concern regarding maintaining healthy reproducing fish populations.

We have seen that surface waters that are prime ecological resources can be hugely and directly affected. The federally-designated Wild & Scenic Lower Farmington River in Connecticut suffered a large spill of PFAS solution on June 8, 2019 after an accidental release of about 50,000 gallons of PFAS firefighting foam in a hangar at Bradley International Airport (www.courant.com/news/connecticut/hc-news-bradley-foam-spill-contaminating-farmington-river-20190612-w6ljr23qeneclowv3wv572dfi-story.html).

These bills offer:

1. A timely, comprehensive approach and suitable mandate
2. Good interagency collaboration and coordination
3. The aim to identify data and research gaps
4. A mechanism for both immediate and long-term planning

They should be strengthened by:

1. Adding a task force member representing environmental groups that are actively involved in watershed management and have considerable expertise in environmental contamination and habitat restoration
2. Adding a task force member from the Mass. Division of Fisheries and Wildlife. MassWildlife scientists are highly trained and with extensive and deep experience in the health of aquatic biota in the Commonwealth.

We would be happy to offer whatever assistance we can to the ENRA Committee and we ask that you seek the above improvement to these bills and give them a **Favorable Report**. If you have any questions, please don't hesitate to contact Alison Field-Juma of OARS at afieldjuma@oars3rivers.org.

Yours sincerely,

Alison Field-Juma, OARS

Emily Norton, Charles River Watershed Association

Samantha Woods, North and South Rivers Watershed Association

Kerry Snyder, Neponset River Watershed Association

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Nancy Goodman, Environmental League of Massachusetts

Don Keeran, Association to Preserve Cape Cod

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Caitlin Peale Sloan, Conservation Law Foundation

Michael Cushner, Mass Audubon

CC: Representative Kate Hogan

Senator Julian Cyr