

May 6, 2026



Carla Romano
Wisconsin Department of Natural Resources (WDNR)
P.O. Box 7921
Madison, WI 53707

To Whom It May Concern,

On behalf of Milwaukee Riverkeeper, we support the Draft Economic Impact Analysis for DG-02-25, related to groundwater standards for PFOA, PFOS, PFHxS, PFNA, PFBS, and HFPO-DA. We have reviewed the Draft Fiscal Estimates & Economic Impact Analysis for these PFAS groundwater standards and largely agree with the assumptions used by DNR staff incorporated into the analysis. Projected costs could be smaller depending on the result of various lawsuits seeking cost recovery for PFAS cleanup under the Spills Law. This economic analysis does not quantify the costs of doing nothing or inaction, including long-term impacts to the environment or the health of residents that are drinking contaminated water. These health impacts can include cancer, thyroid disease, heart issues, impacts to the immune system, and reproductive issues impacting mothers and their babies, among others. There are 94 public water systems that exceed the EPA's new maximum contaminant levels, and the extent of PFAS contamination in private wells is largely unknown. Passing these groundwater standards is long overdue, and will help protect our waters and public health for residents drinking groundwater in Wisconsin.

Milwaukee Riverkeeper is a science-based advocacy organization working to protect water quality and wildlife habitat and advocate for sound land management in the Milwaukee River Basin and nearshore Lake Michigan. Our Basin has widespread PFAS contamination in surface water, sediments, and fish from past industrial activity, and there is significant contamination from the West Bend Airport as well as the General Mitchell Airport, which has very high levels of PFHxS contamination. The City of West Bend is cleaning up their drinking water with help from the State, but there are developing PFAS problems in the drinking water supplies for Saukville, Grafton, and Cedarburg areas. Similar to the state, roughly 1/3 of Milwaukee River Basin residents get their drinking water from wells, with the rest of our communities depending on Lake Michigan. Passing these regulations will protect our communities, as well as our rivers that are also impacted by contaminated groundwater. We urge the State to pass these rules as quickly as possible.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl Nenn", with a long horizontal stroke extending to the right.

Cheryl Nenn
Riverkeeper

