October 15, 2019

Via Email

The Connecticut Interagency PFAS Task Force

Co-Chair
Renee D. Coleman-Mitchell, M.P.H.
Commissioner, Dept. of Public Health

Co-Chair
Katie S. Dykes
Commissioner, Dept. of Energy and Environmental Protection

Re: Draft PFAS Action Plan (Dated October 1, 2019)

Dear Co-Chairs:

The Farmington River Watershed Association, Inc. ("FRWA") submits the following comments on the Draft PFAS Action Plan ("Draft Plan") dated October 1, 2019. FRWA appreciates the opportunity to provide these comments and commends Governor Ned Lamont for the creation of The Connecticut Interagency PFAS Task Force and its commitment to moving quickly to develop a comprehensive action plan for addressing the urgent public health and environmental issues created by PFAS contamination.

FRWA’s mission is to preserve, protect, and restore the Farmington River and its watershed lands. Founded in 1953, FRWA is a nonprofit organization with over 1,000 members, most of whom live and work in the Farmington River watershed. The Farmington River and its watershed have unfortunately been harmed by two PFAS discharges just this year. The first occurred on June 8th and was apparently caused by the activation of a hanger fire suppression system at Bradley Airport. The second occurred on October 2nd and was caused by a tragic airplane accident, also at Bradley Airport.

FRWA’s aim with PFAS is two-fold: (1) to ensure that known PFAS discharges into the Farmington River are fully cleaned up; and (2) to end the serious threat PFAS contamination poses to the Farmington River and its watershed. The stakes are high. The Farmington River is a unique and special natural resource. It is the only river in Connecticut with two Wild and Scenic designations under federal law. It offers premier trout fly-fishing in its upper reaches. Paddling and recreational opportunities are many and popular, and the river gives crucial economic boosts to river towns all along its 81 miles. The Farmington River watershed is also the primary source of drinking water for the Farmington Valley and Greater Hartford – roughly one in seven Connecticut residents depend on it for their water. PFAS contamination endangers all of these crucial services and benefits of a clean and healthy Farmington River.

Given these stakes, FRWA finds that the Draft PFAS Action Plan is a comprehensive proposal that outlines the overall strategies well. FRWA supports the recommended strategies, as well as many of their underlying
actions, particularly testing and monitoring of drinking water sources for PFAS contamination. With an eye towards ensuring full protection of the Farmington River, FRWA respectfully suggests the following changes, additions, or clarifications to the Draft Plan:

1. **Prioritize the Farmington River for immediate protective steps, water monitoring, and clean-up actions.** As the PFAS discharges this year underscore, the Farmington River appears to be uniquely vulnerable to major PFAS contamination due to the location of Bradley Airport. While FRWA understands that corrective action is being taken to limit future discharges from the Airport, the Draft Plan should identify the Farmington River as a special case with immediate needs for protection, water monitoring, and clean-up. The Draft Plan should, for instance, specify the tangible actions that must be taken at Bradley Airport to ensure the Farmington River’s long-term health and safety; such actions could include the use of PFAS alternatives, emergency disconnection from sanitary and storm sewer lines, and permanent containment measures. The Draft Plan should also recommend that PFAS testing and monitoring occur throughout the Farmington River, its tributaries, and its drinking water reservoirs, as soon as possible. Finally, the Draft Action Plan should recommend that the contaminated stretch of the Farmington River in Windsor be prioritized for remediation.

2. **Create a scientific study area on the Farmington River to assess the environmental impacts of PFAS contamination:** The Farmington River and the wildlife it supports—many kinds of fish, birds, reptiles, amphibians, and shellfish—are immensely valuable natural resources. PFAS not only has been correlated with human health harms, but also with apparent wildlife harms. These potential impacts should be studied on the contaminated section of the Farmington River in Windsor; FRWA, in fact, recommends that the relevant state agencies and their university partners should focus available research funds on this issue. Developing a scientific record of possible natural resource and wildlife impacts will not only help Connecticut understand how best to address PFAS contamination, it will also help establish a more accurate sense of the harms inflicted by the recent PFAS discharges into the Farmington River (as well as from discharges in other Connecticut waters).

3. **Ensure the Farmington River’s Massachusetts headwaters are fully protected:** The River’s Massachusetts headwaters could be a protective gap for potential PFAS contamination. The Draft Action Plan should recommend all necessary cooperation and consultation with relevant state agencies in Massachusetts to ensure that the River’s headwaters are monitored for, and safeguarded from, PFAS contamination.

4. **Ban all uses of PFAS firefighting foam as soon as possible:** The easiest and most protective measure to implement in the short term is to end immediately the use of PFAS firefighting foam for training purposes. Bans on other uses also appear possible based on actions taken in other states and internationally. FRWA strongly supports the recommendations of Clean Water Action on this point.

5. **Keep all statutory and regulatory options available for protecting the Farmington River from PFAS contamination.** All relevant state law and common law theories, such as the public trust doctrine, should not be eliminated as possible mechanisms for recovery of remediation costs and any natural resource damages. Manufacturer liability for PFAS firefighting foam (and other uses and products) should also be pursued so that Connecticut can fund necessary monitoring and clean-up actions.

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1 FRWA has attached a recent report from the National Wildlife Federation that provides an excellent summary of research on the ecological and wildlife impacts of PFAS contamination. Please see pages 9-16.
FRWA believes these suggested modifications will help create strong protections for the Farmington River and its watershed. Thank you again for this opportunity to comment and for your consideration.

Respectfully submitted,

William E. Dornbos, Executive Director
Farmington River Watershed Association, Inc.