

KENT COUNTY HEALTH DEPARTMENT



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Adam London
Administrative Health Officer

November 17, 2017

The Honorable Rick Snyder
Governor of the State of Michigan
P.O. Box 30013
Lansing, MI 48909

Re: PFAS in Kent County

Dear Governor Snyder,

As the chief public health official representing Kent County, I would like to express my appreciation for Executive Directive No. 2017-4 establishing the Michigan PFAS Action Response Team. The discovery of per and polyfluoroalkyl substances (PFAS) in our precious groundwater resources, which are used for drinking water by so many Michiganders, is disturbing. Here in Kent County, the plume(s) of this contamination caused by the dumping of industrial wastes has many of our residents fearful for their health and wondering what the future holds. The Kent County Health Department (KCHD) is working to understand the extent of this problem, assess health impacts, and communicate valuable information to our community in a timely manner. The efforts of the departments of Environmental Quality and Health and Human Services have been admirable during the course of the response in Kent County. I do, however, have concerns I would like to bring to your attention:

1. There is a lack of logistic and communications coordination existing between the many organizations involved in this response. The agencies participating in this response have the best of intentions, however, their effectiveness has been compromised by incoordination. In some instances, poor messaging from state agencies has complicated an already complex situation.
2. The State has not activated federal resources which would benefit the citizens of Kent County. PFAS contamination is still somewhat novel to us in Michigan. The US Environmental Protection Agency (EPA) and the Centers for Disease Control's Agency for Toxic Substances Disease Registry (ATSDR) have greater institutional knowledge and resources related to this issue. In my experience with these federal agencies, they deliver a professionalism which inspires trust and confidence within the community. I also believe that the presence of the EPA in Kent County would foster a more effective investigation.
3. The roster of the MPART is insufficient without representation from local public health officials. Local health departments are on the frontline for this and all other matters affecting the health of our communities. Local agencies have the best understanding of our communities because we call them home. Our residents and the media know us by name and they always look locally first for answers and solutions. The work of the MPART will be diminished if it does not deliberately include the perspective of local health departments.
4. Local health departments, who are providing a substantial portion of the of the response workforce, are not built for this sort of ongoing commitment. The state has failed for many years to fulfill its responsibility to fund 50% of the Essential Local Public Health Services which are mandated by law. This fact, together with the reality that new and emerging issues such as PFAS and vapor intrusion are consuming enormous amounts of staff time, leaves counties in a precarious position. The infrastructure of the local public health system is weakened as these new and ongoing issues develop. This represents a significant threat to the public safety and security of our state.

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In response to these concerns, I respectfully propose the following set of recommendations. First, the MPART should recognize the barriers that exist between DEQ, DHHS, and all other agencies. Information sharing, response planning, and public communications should be organized and transparent. We need to be highly intentional about this coordination if we are going to provide our residents the service they deserve and avoid confusion. Secondly, the State of Michigan should invite the EPA and the ATSDR to participate in the Kent County response. I have reason to believe that both of those agencies would appoint liaisons who could act as counsel and contacts for the community. Kent County is prepared to ask for this sort of assistance from those agencies if the State of Michigan declines. Third, the MPART should formally invite full participation from local health departments and the federal agencies referenced above. Townships and other local units of government must be considered as well. The most effective response will only occur if the response team is integrated with expert perspectives from all levels of public service. Finally, the State of Michigan needs to appropriately fund local agencies to meet the obligations of the current mandates and to provide assurance that our communities have robust capacity at the local level to meet these public health challenges.

Thank you for your attention to this matter and for your public service. Please do not hesitate to contact me if you have questions or suggestions for the benefit of our communities.

Sincerely,



Adam London, MPA, RS, DAAS
Administrative Health Officer
Kent County Health Department

Cc: Sen. Dave Hildenbrand, District 29
Sen. Peter MacGregor, District 28
Sen. Tonya Schuitmaker, District 26
Rep. Chris Afendoulis, District 73
Rep. Thomas Albert, District 86
Rep. Tommy Brann, District 77
Rep. Winnie Brinks, District 76
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Rep. Rob VerHeulen, District 74
C. Heidi Grether, Director of the Department of Environmental Quality
Nick Lyon, Director of the Department of Health and Human Services
Eden Wells, Medical Director, Michigan Department of Health and Human Services
Carol Isaacs, Michigan PFAS Action Response Team
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Steve Grimm, Cannon Twp Supervisor
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