FUND TO ADDRESS PFAS CONTAMINATION

ANNUAL REPORT FISCAL YEAR 2023

MAINE DEPARTMENT OF AGRICULTURE CONSERVATION & FORESTRY

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I. INTRODUCTION

The Department of Agriculture, Conservation and Forestry, Office of the Commissioner, is pleased to submit this first annual report on the newly established Fund to Address PFAS Contamination ("the PFAS Fund") to the Joint Standing Committees on Agriculture, Conservation and Forestry; Environment and Natural Resources; and Health and Human Services.

II. ANNUAL REPORTING REQUIREMENT

Under 7 MRSA §320-K(7), by March 1 annually, the Department of Agriculture, Conservation and Forestry ("the Department") is to submit an annual report that provides the following information to the Joint Standing Committees on Agriculture, Conservation and Forestry; Environment and Natural Resources; and Health and Human Services:

A. The status of carrying out the purposes of the Fund as described in §320-K(4);
B. Activities of the advisory committee, including, but not limited to, (1) the number of meetings held, (2) a summary of each meeting, and (3) recommendations for legislation from the advisory committee;
C. Additional needs identified by the agricultural community; and
D. What funds have been distributed from the Fund, and for what purpose(s).

III. BACKGROUND

The $60 million Fund to Address PFAS Contamination was established by Governor Mills via Public Law 2021, Chapter 635, Part XX (State Supplemental Budget), signed on April 20, 2022, and codified at 7 MRSA Chapter 10-D.

Section XX-3 directs the Department to develop and implement an initial plan that prioritizes program funding and implementation consistent with 7 MRSA §320-K(4), which states that allocations from the PFAS Fund may be used as determined by the Department, upon recommendation of an advisory committee, for the following purposes:

A. Monitoring the health of a person, and members of that person's household, whose agricultural land is found to be contaminated by PFAS;

B. Providing medical care to a person found to have blood levels of PFAS greater than the general population or health effects associated with exposure to PFAS;

C. Relocating a commercial farm when the agricultural land of the farm is found to be contaminated by PFAS;

D. Buying and selling agricultural land found to be contaminated by PFAS;

E. Investing in equipment, facilities, and infrastructure to ensure that a commercial farm with land found to be contaminated by PFAS maintains profitability while the commercial farm transitions to an alternative cropping system or implements remediation strategies, technological adaptations, solar development, or other modifications to its operations in response to PFAS contamination;

F. Assisting a commercial farm with land found to be contaminated by PFAS with developing enterprise budgets for alternative cropping systems, remediation strategies, or technological adaptations or transitioning to alternative revenue streams, including but not limited to land use systems combining agricultural use of the land with solar energy production;

G. Providing short-term assistance to a person whose commercial farm is found to be contaminated by PFAS, including but not limited to income replacement and mortgage payments;

H. Evaluating the capacity of PFAS testing and data management in the State;

I. Conducting research that supports short-term farm management decisions and assesses future options for viable uses of agricultural land that has been contaminated with PFAS;

J. Conducting research that quantifies the impact of PFAS on commercial farms and agricultural communities in the State;

K. Conducting research on soil and water remediation systems and the viability of those systems for commercial farms;

L. Conducting research on alternative cropping systems, PFAS uptake of different crops, the use of livestock systems to mitigate exposure to and for remediation of PFAS, and food safety criteria for food products;

M. Developing and implementing educational programs for landowners, including but not limited to determining best practices for informing residents about the potential of being near or on a site on which sludge or septage application was licensed or permitted by the State prior to 2019, and providing information and guidance on buying or selling agricultural lands that have had sludge or septage applied;

N. Long-term monitoring of PFAS contaminated sites and establishing a corresponding centralized data repository;

O. Establishing food safety criteria and guidance for farm products;

P. Assisting commercial farms and others in the agricultural sector not directly affected by PFAS contamination with marketing efforts whose branding and marketing may be affected by public perception of PFAS contamination in the State; and

Q. Regional planning with other states and the Federal Government to protect the food supply and farmers in the state from out-of-state PFAS contamination.

Additionally, in coordination with the Maine Department of Health and Human Services (DHHS), the Department may establish a blood testing and medical monitoring program "for persons whose drinking water or agricultural land is found to be contaminated by PFAS." Sec. XX-3(3).

IV. STATUS OF CARRYING OUT THE PURPOSE OF THE FUND / ACTIVITIES OF THE ADVISORY COMMITTEE

A. PFAS Fund Director and Advisory Committee

The Department's first step in carrying out the purpose of the Fund was to hire a program director. The Department posted the position on June 14, 2022, interviews were conducted in July 2022, and an offer

was extended on July 29, 2022. Beth Valentine began work as director of the Fund to Address PFAS Contamination on September 7, 2022.

Also in September 2022, Commissioner Beal established an advisory committee pursuant to 7 MRSA §320-L(1):

1. Senator Stacy Brenner, co-chair (appointed by the President of the Senate)
2. Senator Richard Bennett (appointed by the President of the Senate)
3. Representative Jessica Fay, co-chair (appointed by the Speaker of the House of Representatives)
4. Representative Randall Hall (appointed by the Speaker of the House of Representatives)
5. Department of Agriculture, Conservation and Forestry Commissioner Amanda Beal (ex officio)
6. Department of Environmental Protection Commissioner Melanie Loyzim (ex officio)
7. Nancy Beardsley (DHHS Commissioner Lambrew's designee)
8. Dean Diane Rowland (appointed by the President of the University of Maine)
9. Farm Service Agency State Director Sherry Hamel (expert in agricultural finance and lending; appointed by Commissioner Beal)
10. James Buckle (farmer; appointed by Commissioner Beal)
11. Steven Crane (farmer; appointed by Commissioner Beal)
12. Jenni Tilton Flood (farmer; appointed by Commissioner Beal)
13. Katia Holmes (farmer; appointed by Commissioner Beal)
14. Adrienne Lee (farmer; appointed by Commissioner Beal)
15. Maine Public Health Association Executive Director Rebecca Boulos, MPH, Ph.D. (expert in public health; appointed by Commissioner Beal)

The role of the advisory committee is to make recommendations to the Department regarding the administration of the Fund, and to report to the Legislature. This is an advisory board with, pursuant to 5 MRSA §12004-I, authority to "advise state agencies, review policies and procedures, conduct studies, evaluate programs and make recommendations to the state agencies, the Legislature or the Governor.").

B: Advisory Committee Meetings and Activities

October 25, 2022	Orientation to the Department's and the committee's statutory charges. Set expectations regarding meeting norms and logistics, and timeline.
November 14, 2022	Agreed on meeting guidelines and remote meeting policy. Presenters from the Department of Agriculture, Conservation and Forestry, the Department of Environmental Protection, the Maine Center for Disease Control and Prevention, the University of Maine, and Maine Farmland Trust provided an introduction to ongoing PFAS-related work being conducted in Maine.

December 12, 2022	Discussed goals of the Fund, defined initial priorities, and initiated the formation of subcommittees (see below).
January 11, 2023	Public hearing during the Agricultural Trades Show to solicit public input on uses of the Fund (see below).
February 13, 2023	Met to review the status of the subcommittees' work and to review the advisory committee's draft report to the Legislature.

Recordings and meeting materials are available on the PFAS Fund's website:
PFAS Fund Advisory Committee: Maine Department of Agriculture, Conservation and Forestry.

C. Development of Implementation Plan

As noted above, the Department is obligated to develop and implement an initial plan that prioritizes funding and implementation of programs consistent with the purposes listed in 7 MRSA §320-K(4). To guide the planning process, the advisory committee established short- and long-term goals for the PFAS Fund:

> **Short-term:** Support farmers impacted by PFAS contamination while they investigate and consider options.
>
> **Long-term:** Enable impacted farmers and farms to thrive in their new circumstances.

Short-term is defined as 24 months starting from the date elevated levels of PFAS are discovered at a farm. The Department, with input from the advisory committee, made the distinction between short-term and long-term because farmers have substantially greater needs in the early days following the discovery of PFAS. The intention, moving forward, is to provide impacted farmers with financial security while contamination is thoroughly investigated at their farms and they consider options for remaining in agriculture.

PFAS may be discovered on land or in water through the Department of Environmental Protection's (DEP's) tiered testing program[1] or through self-testing by the farmer. If elevated levels of PFAS are found on a farm, the Department of Agriculture, Conservation and Forestry's Bureau of Agriculture, Food, and Rural Resources (BAFRR) will conduct additional testing. This additional testing may include further soil and water samples, as well as samples of plant and animal tissues; farm products such as milk, beef, and eggs; and farm inputs such as feed. The samples are gathered by BAFRR staff and sent to certified laboratories for analysis. Due to the dearth of certified labs throughout the country – and demand for their services – the wait time for results can range from six to ten weeks, depending on the type of sample (muscle tissue samples typically take the longest). Results may indicate the need for further

[1] Public Law 2021, Chapter 478, An Act To Investigate PFAS Substance Contamination of Land and Groundwater became effective on October 18, 2021. This law requires the DEP to develop and implement a program to evaluate soil and groundwater for PFAS at locations licensed to land apply sludge or septage prior to 2019. Note that not all licensed sites actually received biosolids. Also, not every application site will have elevated levels of PFAS. As of December 1, 2022, DEP had approximately 214 out of 1,037 sites under investigation. Maine DEP, Status of Maine's PFAS Soil and Groundwater Investigation at Sludge and Septage Land Application Sites (Jan. 15, 2023), 22-23. DEP has completed testing of those sites suspected to have the highest risk of PFAS exposure (Tier I). It is now working on Tier II sites and anticipates completing all sites by December 2025. *Id.,* at 1, 22.

testing, triggering additional waiting periods. Farmers are in limbo while they await test results. When results are received, BAFRR and Maine CDC staff assess them and work with the farmer to create potential mitigation plans. These plans can require significant changes to the farm's prior operations and management, such as shifting into new crops or closely managing when and where livestock can graze and carefully controlling their feed intake. In many cases, the speed at which new plans can be implemented will be constrained by the seasonal nature of farming. For all of these reasons, there is an urgent need to provide concentrated support to farmers within at least the first 24 months after the discovery of PFAS on their property.

Currently, 56 farms in Maine are known to have varying levels of PFAS contamination. These farms are eligible for existing support from BAFRR and will be eligible for support from the PFAS Fund once programs are established. Newly discovered farms will likewise be eligible for PFAS Fund support. Measures will be taken to ensure that duplicative payments are avoided. The existing support available from BAFRR includes payments for testing, water filtration systems, infrastructure investments, income replacement, and livestock indemnification. It is likely that responsibility for infrastructure investment in excess of $150,000[2] and income replacement payment will shift from BAFRR to the PFAS Fund.

In addition to setting goals, the advisory committee also narrowed the scope of projects the PFAS Fund will support, *i.e.,* it determined that certain potential uses listed in 7 MRSA §320-K(4) would not be prioritized. Specifically, the PFAS Fund will not develop food safety criteria as these are regulatory determinations made by other entities. Also, the PFAS Fund will limit medical care to blood testing and access to medical monitoring and mental health care. The PFAS Fund will not directly support medical treatment, *e.g.,* the Fund will not pay for medications.

The advisory committee has the authority to form working groups that include and seek input from subject matter experts from the public and private sectors. Accordingly, the advisory committee established four subcommittees to develop, analyze, and recommend strategies to the PFAS Fund advisory committee. The subcommittees are Financial and Business Support, Land Transfers, Research, and Health. Each subcommittee met for the first time in late January 2023. By May 1, 2023, the subcommittees will propose concrete strategies and preliminary budgets to the advisory committee using a consistent template (see Appendix A).

The advisory committee will then evaluate the subcommittees' recommendations in concert and use them as the basis for a draft implementation plan that will be presented to the Department. The Department, in turn, is required to seek public comment on the draft implementation plan. It will schedule a public hearing as soon as practical after receipt of the draft plan. Comments received at the public hearing will be considered by the advisory committee as the implementation plan is finalized.

Once the plan is finalized, the Department will take the advisory committee's recommendations under advisement as it begins to implement the Fund to Address PFAS Contamination. The Department anticipates that it will begin dispersing funds in the summer of 2023.

[2] BAFRR currently provides a suite of support to farms, including helping provide clean feed, purchasing equipment necessary to help a farm pivot to a new type of production, or funding infrastructure projects on the farm that help the farmer adjust to PFAS contamination. BAFRR currently caps infrastructure investments (permanent fixtures or structures) at $150,000. A farm may still receive additional support (equipment, clean feed) beyond the $150,000 infrastructure cap. It is envisioned that BAFRR will continue to provide these types of support but that requests for infrastructure investment exceeding $150,000 would be directed to the PFAS Fund. Examples could include requests to build new or relocate existing greenhouses, build new outbuildings or barns, etc.

D. Financial and Business Support Subcommittee

The mission of the Financial and Business Support Subcommittee is to develop, analyze, and recommend strategies to the PFAS Fund advisory committee for short- and long-term financial and planning assistance for farmers impacted by PFAS contamination.

The Financial and Business Support Subcommittee is considering whether and how the PFAS Fund can provide the following types of support:

- Income replacement and other direct financial assistance;
- Infrastructure investments that allow farmers to shift to alternative types or methods of production;
- Access to technical experts (agronomic, financial, legal, etc.) to help farmers determine how best to move forward;
- Loan guarantees; and
- Marketing and market access assistance.

The Financial and Business Support Subcommittee members are:

1. Nancy McBrady, DACF, co-chair
2. Adrienne Lee, New Beat Farm, co-chair
3. Jenni Tilton Flood, Flood Brothers Farm
4. Steve Crane, Crane Brothers Farms
5. Jim Buckle, The Buckle Farm
6. Katia Holmes, Misty Brook Farm
7. Tricia Rouleau, Maine Farmland Trust
8. Mariam Taleb, Maine Organic Farmers and Gardeners Association
9. Jason Harkins, University of Maine Business School
10. Lucia Brown, USDA Farm Service Agency
11. Fred Stone, Stoneridge Farms
12. Jed Beach, FarmSmart

E. Land Transfers Subcommittee

The mission of the Land Transfers Subcommittee is to develop, analyze, and recommend strategies to the PFAS Fund advisory committee for the purchase and sale of agricultural land with known PFAS contamination.

The Land Transfers Subcommittee is presently considering (1) policies and procedures the PFAS Fund could adopt for the purchase and sale of agricultural land with known PFAS contamination and (2) an educational program for landowners to provide guidance related to the purchase and sale of PFAS-impacted land.

The Land Transfers Subcommittee members are:

1. Sherry Hamel, USDA Farm Service Agency, co-chair
2. Alex Redfield, DACF Agricultural Resource Development Division, co-chair
3. Steve Crane, Crane Brothers Farm
4. Nick Hodgkins, DEP Division of Remediation
5. Emma Enoch, Coastal Enterprises, Inc.
6. Sarah Demers, DACF Land for Maine's Future program

7. Nancy Smith, GrowSmart Maine
8. Brett Sykes, Maine Farmland Trust
9. Jeff Baron, Farm Credit East
10. Adam Nordell, Defend Our Health & Songbird Farm

F. Research Subcommittee

The mission of the Research Subcommittee is to develop, analyze, and recommend strategies to the PFAS Fund advisory committee for short- and long-term research that informs farm management decisions.

The Research subcommittee is presently considering whether and how the PFAS Fund can fund a competitive research grant program, opportunistic research, an experiment station, and a digital library/database of PFAS-related research.

Members of the Research Subcommittee are:
1. Amanda Beal, DACF, co-chair
2. Diane Rowland, University of Maine, co-chair
3. Nancy McBrady, DACF
4. Jenni Tilton-Flood, Flood Brothers Farm
5. Katia Holmes, Misty Brook Farm
6. Rebecca Boulos, Maine Public Health Association
7. Andy Smith, DHHS Maine CDC
8. Tim MacMillan, DEP Division of Technical Services
9. Ellen Griswold, Maine Farmland Trust
10. Gail Carlson, Colby College
11. Hannah Carter, University of Maine
12. Charles Rolsky, Shaw Institute
13. Andrew Carpenter, Northern Tilth
14. Caleb Goossen, MOFGA

G. Health Subcommittee

The mission of the Health Subcommittee is to develop, analyze, and recommend strategies to the PFAS Fund advisory committee for the provision of blood testing, medical monitoring, and mental health support in the short- and long-term for individuals whose drinking water or agricultural land is found to be contaminated by PFAS.

In addition to developing recommendations for testing and monitoring programs for impacted farmers, the Health Subcommittee is working to define the parameters of PL 2021, c. 635, sec. XX-3(3), "a PFAS medical monitoring and blood levels of PFAS testing program for persons whose drinking water or agricultural land is found to be contaminated by PFAS."

Members of the Health Subcommittee are:
1. Isaac Benowitz, MD, DHHS Maine CDC, co-chair
2. Rebecca Boulos, MPH, PhD, Maine Public Health Association, co-chair
3. Andy Smith, SM, ScD, DHHS Maine CDC
4. Stacy Brenner, RN, State Senator & Broadturn Farm

5. Rachel Criswell, MD, MS, Skowhegan Family Practice
6. Abby Fleisch, MD, Maine Health
7. Adam Nordell, BA, Defend Our Health
8. Demetri Blanas, MD, Maine Mobile Health
9. Leslie Walleigh, MD, MPH, DHHS Maine CDC

V. ADDITIONAL NEEDS IDENTIFIED BY THE AGRICULTURAL COMMUNITY

The advisory committee is required to hold two public hearings annually. It held its first public hearing on January 11, 2023, at the Agricultural Trades Show. Over a dozen speakers offered recommendations for use of the Fund.

A recording of the hearing is available here: PFAS Fund Hearing - January 11, 2023 at Ag Trades Show - YouTube. The public's comments are summarized below.

- Farmers should be made whole financially.
- Include support for farmers who farm on leased land.
- Food safety is a primary concern.
- It is important to disseminate funds quickly, so farms don't go out of business.
- Be aware that while test results are pending, milk has to be dumped; even when the test is negative there is still a hit to the farmer and/or co-op.
- Need quick and reliable testing.
- Include farms exposed to PFAS through military operations, as well as via biosolids.
- Focus on research with on-the-ground impact and on-farm methods when practical/applicable.
- Dedicate some of the funds to research wool production on contaminated land, with or without solar installations.
- Investigate the impact of PFAS-contaminated dust.
- Use an impacted farm as an animal research site.
- Be prepared for whole-farm buyouts
- Will the fund inform tax assessors of the presence of PFAS (to reduce tax bills)?
- Keep a focus on health impacts.
- Consider health testing for people not living on farms.
- DEP ought to provide more explanation with their sludge maps; not every licensed site received sludge and not all sludge had PFAS.
- Use the fund to educate consumers to avoid products with PFAS so that they don't enter the waste stream in the first place
- Need to get correct information out to counter fear.
- The advisory committee should look for additional sources of funding.

The advisory committee and, ultimately, the Department will take these recommendations into account as they continue to develop the PFAS Fund's initial implementation plan. They will seek further public input once the draft implementation plan is complete.

VI. FUNDS DISTRIBUTED TO DATE

PL 2021, c. 635, sec. XX-3 directs the Department to develop a plan to implement programs consistent with 7 MRSA §320-K(4). The Department must seek public comment on the draft plan before it can be adopted. As described above, the Department is working diligently with the advisory committee and subcommittees to have a draft plan ready in May 2023. A public hearing will be scheduled as soon as practical thereafter. Expenditures from the PFAS Fund will likely begin in earnest during the summer of 2023.

To date, $190.97 has been spent from the PFAS Fund to reimburse public members of the advisory committee or subcommittees for travel to and from meetings.

As discussed, the PFAS Fund Implementation Plan is under development. The subcommittees are just beginning to develop preliminary budgets for the programs in their respective purviews. Nonetheless, the following observations suggest that $60 million will not be sufficient to fully address all of the needs being contemplated for the use of the PFAS Fund.

- Preliminary projections are that the PFAS Fund will spend $3-5 million annually through fiscal year 2028 for income replacement.[3] The current estimate for FY '23 – FY '28 is $23,500,000.
- The Fund anticipates that some farmers will decide they want to sell their property. In addition to the cost of the property itself (anticipated to be the fair market value as if there was no PFAS contamination), there will be ancillary expenses such as appraisals, title searches, boundary surveys, and environmental studies. The PFAS Fund would subsequently bear the cost of maintenance for the land and any associated structures. Thus, the cost to acquire and manage PFAS-contaminated farmland could run into millions of dollars per year.
- A PFAS-contaminated farm could serve as a highly valuable research site. The establishment of a research station on property acquired by the PFAS Fund will necessitate additional expenditures for staff, research equipment, utilities, etc.
- The estimated cost for a single, multi-year rigorous academic research project is $500,000. The statute and the Research Subcommittee have identified almost a dozen research priorities. The cost to support one research project in each priority area would be about $6 million.
- The Health Subcommittee has not estimated any costs yet. However, the list price of a PFAS blood serum test is approximately $500. As of December 16, 2022, DEP had taken groundwater samples at 1,525 residences. Of those samples, 23 percent (or about 350 homes) had results exceeding Maine's interim drinking water standard of 200 ppt of a sum of six PFAS compounds.[4] If the PFAS Fund paid for one test for just one member of each impacted household, the cost

[3] DEP anticipates that it will complete its testing of biosolid spread sites by December 2025. Presumably, most PFAS-impacted farms will be identified within this same process. Thus, income replacement expenditures should phase out in FY ’28.

[4] Maine DEP, Status of Maine’s PFAS Soil and Groundwater Investigation at Sludge and Septage Land Application Sites (Jan. 15, 2023), 24.

would be $175,000 ($500 x 350). However, it is probable that there is more than one person living in each residence. Also, we know that DEP is years away from completing its groundwater testing. It is conceivable that it will ultimately identify thousands of homes with impacted well water and that the residents of those homes will want to know what their PFAS blood serum levels are so they and their physicians can make informed medical decisions. It is easy to imagine that the demand for PFAS blood testing will increase over the next several years and could overwhelm the PFAS Fund. Furthermore, the U.S. Environmental Protection Agency is presently developing a proposed National Drinking Water Regulation for PFOA and PFOS (two specific PFAS compounds). It is likely that the demand for PFAS blood serum testing will increase once a new, stricter federal drinking water standard is established.

This representative list does not include estimates for other PFAS Fund recommendations currently under development, such as the establishment of a roster of technical experts to provide guidance to impacted farmers, the hiring of "case workers" to guide impacted farmers through the recovery process, big-ticket infrastructure investments to allow farmers to modify their operations in response to the discovery of PFAS, funds for opportunistic research or a digital research library, support for medical monitoring and mental health care, and a public health study.

VII. RECOMMENDATIONS FOR LEGISLATION FROM THE DEPARTMENT

The Department requests the following modifications to the present law governing the PFAS Fund.

- **One report to the Legislature.** 7 MRSA §320-K(7) requires the Department to report annually to the Joint Standing Committees on Agriculture, Conservation and Forestry; Environment and Natural Resources; and Health and Human Services. 7 MRSA §320-L(3) requires the advisory committee to report annually to the Joint Standing Committees on Agriculture, Conservation and Forestry, and Environment and Natural Resources. The specified content of the advisory committee's report is duplicative of information that must also be included in the Department's report. The same staff person is writing both reports. Accordingly, the Department requests that 7 MRSA ch. 10-D be modified to require just a single comprehensive report from the Department.
- **Per diem for public members.** Farmers are included in the membership of the advisory committee. They need to take time away from their livelihoods to participate in meetings. Per 5 MRSA §12004-I, sub 2-I, they are eligible for reimbursement for travel expenses associated with meeting participation, *i.e.,* mileage and tolls. In contrast, the legislative members of the committee are eligible for both per diem and travel expenses. The Department requests that 5 MRSA §12004-I, sub 2-I be modified to allow public members of the advisory committee to receive per diem, as well as travel expenses.
- **Extend legislators' terms on the advisory committee until new appointments are made.** Per 7 MRSA §320-L(1), legislators on the advisory committee are appointed for the duration of the legislative terms of office for which they were appointed. As a result of this requirement, there was a period following the November 2022 election when the PFAS Fund advisory committee did not have co-chairs or any legislative members, creating uncertainty during a critical time in the development of the PFAS Fund. To prevent this gap in representation in the future, the Department asks that legislators appointed to the advisory committee continue to serve until either the President of the Senate or the Speaker of the House of Representatives names new appointees.

VIII. RECOMMENDATIONS FOR LEGISLATION FROM THE ADVISORY COMMITTEE

The PFAS Fund advisory committee does not have recommendations for legislation at this early stage of program development.

Appendix A

Name of Subcommittee

Strategy No. _____

Identify which purpose(s) listed in 7 MRSA 320-K(4), if any, this strategy will address:
Describe the strategy:
Who will be eligible?
Who will benefit? How?
Will anyone be disadvantaged?
Is there a model for this, either in or outside of Maine?
Do we need additional research or data?
How will recipients be selected?
What documentation is needed?
What sort of controls should be in place?
What is the timeframe for implementation?
Should there be a time limit?
How might the strategy address issues of equity?
What is the anticipated budget?

Comments from PFAS Fund advisory committee:

Public comments: