

## Amy Kyle

First I want to recognize the work that the State of Washington has done in preparing its draft PFAS Action Plan. Few if any states have prepared as comprehensive an analysis as Washington has.

One suggestion for the EIS is to bring an equity analysis into the project. Designing a useful way to assess equity concerns that is responsive to the parties involved would seem to be an important step in this analysis because of the State's commitment to environmental justice. Having a way to explicitly assess how different alternatives may affect different groups and areas, and particularly how they may affect communities of color and Tribal communities and resources, could contribute to a successful and meaningful assessment.

A second suggestion has to do with the implications of intervening to stop the movement of PFAS materials into the environment and into drinking water sources. The AFFF collection program retrieves unwanted PFAS materials before they can be released into the environment and disperse into water or other resources.

It may be informative to compare this kind of early collection approach to the feasibility and cost of trying to deal with PFAS compounds after they get into drinking water and have to be treated out (and then treatment media dealt with).

The draft Action Plan seems to place more emphasis on treating drinking water than on preventing contamination of drinking water. The EIS process might be an opportunity to consider whether more emphasis on collecting PFAS materials to avoid contamination of water sources might be more feasible for some situations and deserve more attention. I would also suggest that cost estimates for drinking water treatment in the draft Action Plan are probably understated.

Thank you for considering these comments.