

**Testimony of Breanna Knudsen**  
**“Improving Interagency and Intergovernmental Coordination on PFAS**  
**for Michigan Communities”**  
**August 1, 2022**

Good morning, Senators. My name is Breanna Knudsen, and I am the Environmental Response Program Specialist for the Saginaw Chippewa Indian Tribe of Michigan, speaking today on behalf of the Saginaw Chippewa Indian Tribe of Michigan. The Tribe is appreciative of the opportunity to testify at this field hearing of the Senate Homeland Security and Governmental Affairs Committee, as nominated to do so by the United Tribes of Michigan.

Historically, the Saginaw Chippewa Indian Tribe of Michigan lived primarily in the Eastern region of what is now Michigan. Between 1795-1864, a total of sixteen treaties between the U.S. Government and the Tribe were made. The main Ceded Territories of the Tribe were designated specifically in the Treaties of 1855 and 1864, which also established the Isabella Reservation. Over 130,000 acres were allotted to the Reservation. The Tribe also maintains a second, satellite Reservation Area, in Standish, and owns additional properties in Arenac and Iosco Counties.

Within the Isabella Reservation of the Saginaw Chippewa Indian Tribe of Michigan, there are three sites -- two defunct landfills, and an old refinery -- known to be sources of PFAS contamination. Within Ceded Territory boundaries, there is the Wurtsmith Air Force Base, a known source of PFAS contamination as well. In Clark’s Marsh, near that airbase, previous testing for PFAS revealed extremely high levels of PFAS, in the tissues of fish caught in that marsh.

CERCLA, or the Comprehensive Environmental Response, Compensation, and Liability Act of 2002, provides to Tribal nations the rights to enforce cleanup and remediation of contamination on Tribal lands. However, the Tribe cannot pursue cleanup actions in these sites until the Federal government officially classifies PFAS as a regulated Hazardous Substance under CERCLA designation. Without this classification, there can be no Cleanup Standards created to achieve and enforce; and without Cleanup Standards to achieve and enforce, there can be no legal instrument to hold responsible parties liable for contamination by remediating and restoring these sites. Thus, to clean PFAS from their lands, the hands of the Tribe are tied without official classification of PFAS as a regulated Hazardous Substance under CERCLA.

It must be noted that statements made by the Saginaw Chippewa Indian Tribe of Michigan do not and should not be construed as representative of the other eleven Federally-recognized Tribal nations in Michigan. The Tribe has previously facilitated inter-Tribal and inter-agency efforts to address PFAS issues in Michigan, and looks forward to continued cooperation to resolve PFAS contamination sources on Tribal lands. Thank you for your time.