Considering PFAS Contamination in Project Evaluation

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Why PFAS Matters in Priority 2 Planning

PFAS Contamination and Priority 2 Projects

Why does PFAS contamination matter for Priority 2 planning?

- Priority 2 funding is intended to compensate for injuries to natural resources and services caused by PFAS released by 3M
  - It is therefore prudent to prioritize projects that do not result in additional PFAS injuries to the same resources and/or services
  - It is also important to avoid projects that would increase the risk of potential human health impacts through fish consumption

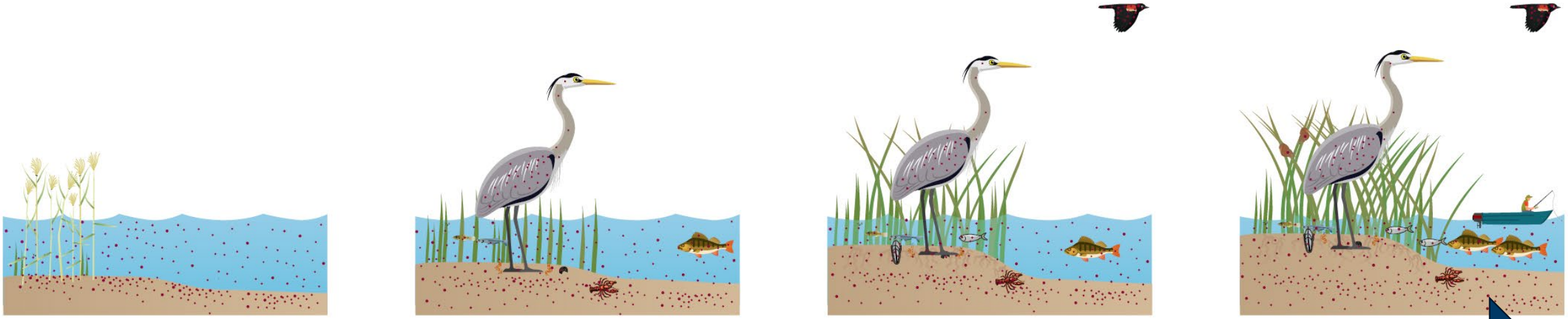
PFAS Contamination and Priority 2 Projects

Relevant to two major types of projects under Priority 2:

1. **Habitat restoration projects**
   - Restoring habitat in contaminated areas could draw wildlife to such areas, increasing the risk of PFAS related injuries
2. **Recreational fishing projects**
   - Projects that enhance access to recreational fishing in contaminated areas could risk increasing consumption of contaminated fish, with associated human health impacts

PFAS Contamination and Priority 2 Projects

- Some types of projects in contaminated areas could attract more wildlife and inadvertently increase exposure



Increased ecological service level through restoration

PFAS Contamination and Priority 2 Projects

Project activity examples that are **PFAS sensitive (may increase exposure risk)**

- Aquatic, wetland or nearshore habitat restoration
- Aquatic connectivity (dam removal/fish passage)
- Bird nesting platforms (for birds that consume fish)
- Fish or bivalve stocking
- Island construction/enhancement
- Fishing pier/access point construction or improvements*

**Requires special, separate consideration and discussion – later in the presentation*

PFAS Contamination and Priority 2 Projects

Project activity examples that are **not PFAS sensitive (do not increase exposure risk)**

- Recreational trail improvements / construction
- Educational signage / communications
- Communication about fish consumption risks related to PFAS
- Habitat protection / conservation easement
- Bird viewing platform construction / enhancement
- Shoreline erosion prevention / trail construction for human use
- Terrestrial habitat improvements / pollinator habitats
- Invasive species management
- Surface water quality improvement/storm water runoff mitigation
- Resource surveys (fish migration, creel survey, trail survey, etc.)
- Boat or kayak launch construction / enhancement

Options for Considering PFAS in Priority 2 Planning

PFAS Consideration Options

- Issue: What are the options for considering PFAS in the Priority 2 planning

Options	Description	
1	Limit projects to those types of activities that do not increase PFAS related risks (i.e., no aquatic, wetland, or nearshore habitat restoration or fishing projects)	**Not PFAS sensitive (does not increase exposure risk)**
2	Require projects that include PFAS sensitive activities to have PFAS levels below established thresholds; PFAS data could be collected as part of the screening process if no data are currently available	**PFAS sensitive (may increase exposure risk)**
3	Allow projects with PFAS sensitive activities to move forward if they are outside specific high-risk areas (e.g., Raleigh Creek, Eagle Point Lake, Horseshoe Lake)	
4	Include PFAS contamination status in the project evaluation process for projects with PFAS sensitive activities; this would be assessed qualitatively	

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Option 1

- **Option 1:** Only support project activity types that would not increase PFAS related risk of natural resource injuries or fish consumption related human health impacts
  - Pros
    - ✓ Simplifies the project screening and evaluation process
    - ✓ Projects would be implemented more quickly
  - Cons
    - ✓ Not consistent with the settlement language
    - ✓ Excludes important activities that would directly address the harms done by PFAS to wildlife and recreation

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Option 2

- **Option 2:** For projects with PFAS sensitive activities, require that PFAS data for potential project sites be either available or collected, and screen based on established thresholds
  - Additional components:
    - The RFP process would likely be phased
      - Project proponents submit project ideas, and only those that pass PFAS screening asked to submit full proposals
    - Project specific sampling support options
      - State conducts project-focused sampling by enlisting a contractor to support all needed sampling at proposed project sites
      - Project proposers request sampling funds and conduct work

Option 2, continued

- **Option 2:** For projects with PFAS sensitive activities, require that PFAS data for potential project sites be either available or collected, and screen based on established thresholds
  - Pros
    - ✓ Helps ensure the projects do not increase PFAS related natural resource injuries or fish consumption related human health risks
    - ✓ Phased approach to applications can save communities time if they propose project sites or activities that are not eligible for Priority 2 funding
  - Cons
    - ✓ Adds complexity, cost, and time (up to 1 year) to the Priority 2 planning process
    - ✓ Delays project approval and implementation

Option 3

- **Option 3:** Allow projects with PFAS sensitive activities to move forward if they are outside specific high-risk areas (e.g., Raleigh Creek, portions of Pool 2 - specifically near Cottage Grove)*
  - Pros
    - ✓ Simplifies the project screening and evaluation process, particularly as compared to requiring sampling
    - ✓ Highest risk areas excluded
  - Cons
    - ✓ Some risk of PFAS collateral injury from projects still will exist, particularly for fish eating wildlife

**Will refine the list of high-risk areas in the future*

Option 4

- **Option 4:** Include PFAS contamination status in the project evaluation process for projects with PFAS sensitive activities; would be assessed qualitatively
- How?
  - Make clear that the Co-Trustees seek to minimize the risk of project-related PFAS injuries to natural resources and services
    - Projects in areas with PFAS levels known to be lower than currently established risk thresholds would be evaluated favorably
    - Projects in areas with unknown PFAS levels or with PFAS levels exceeding established risk thresholds would be evaluated less favorably

Option 4, continued

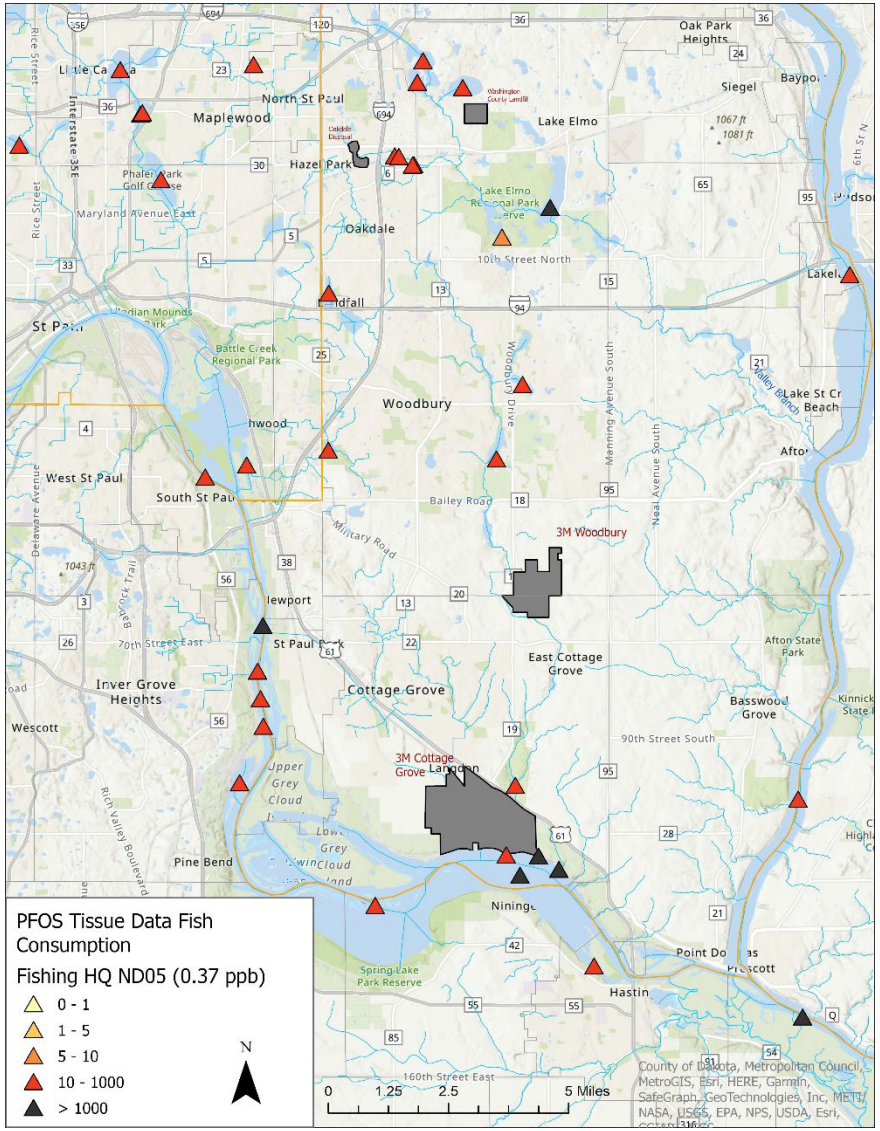
- **Option 4:** Include PFAS contamination status in the project evaluation process for projects with PFAS sensitive activities; would be assessed qualitatively
  - Pros
    - ✓ Simplifies the project screening and evaluation process, particularly as compared to requiring sampling
    - ✓ Rewards projects that minimize harm
    - ✓ Can combined with Option 3 to exclude highest risk areas
  - Cons
    - ✓ Unless other data are available, qualitative assessment of PFAS risk means, like Option 3, some risk of injury will still exist for projects without PFAS data

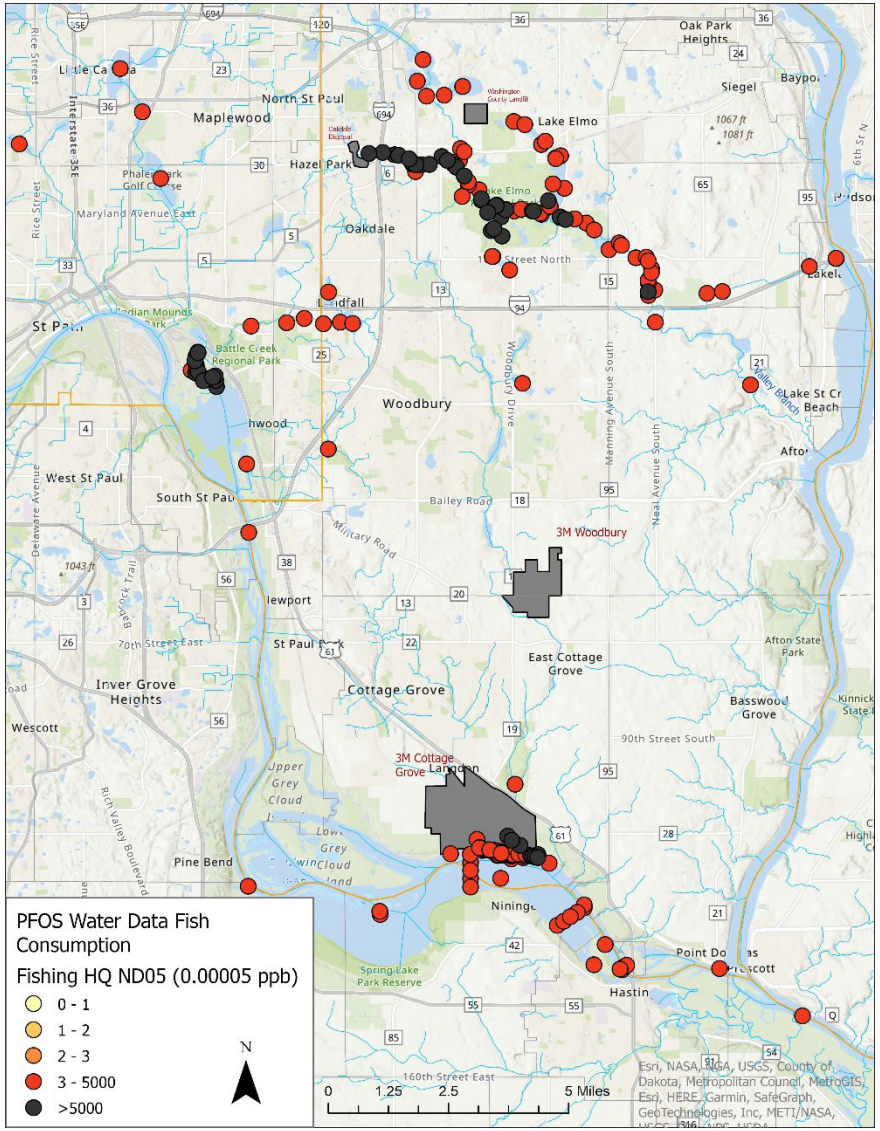
PFAS Consideration Options

Options	Description	Recommend
1	Limit projects to those activities that do not increase PFAS related risks (i.e., no aquatic, wetland, or nearshore habitat restoration or fishing projects)	No
2	Require projects that include PFAS sensitive activities to have PFAS levels below established thresholds; PFAS data could be collected as part of the screening process if no data are currently available	No
3	Allow projects with PFAS sensitive activities to move forward if they are outside specific high-risk areas (e.g., Raleigh Creek, Eagle Point Lake, Horseshoe Lake)	Maybe
4	Include PFAS contamination status in the project evaluation process for projects with PFAS sensitive activities; this would be assessed qualitatively	Yes

Recreational Fishing and Priority 2

PFOS Threshold Maps for Recreational Fishing Projects





Key Issues/Questions

- <u>Issue:</u> Implementing recreational fishing projects in East Metro could increase risk of health impacts to human consumers of fish

1. Should Priority 2 fund ***any*** recreational fishing projects involving human use knowing these potential risks?
2. Should Priority 2 require such projects to incorporate communications about fish consumption risks?
    - Would this sufficiently mitigate the potential human health risks of improving access to recreational fishing?

Discussion