

Review of Work Group Survey Results: PFAS Consideration Options and Evaluation Criteria

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- Survey Sections
 - PFAS consideration option ranking
 - Additional feedback about the options
 - Evaluation criteria weighting
 - Additional feedback about the options
- 17 responses from Work Group members

PFAS Consideration Options

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

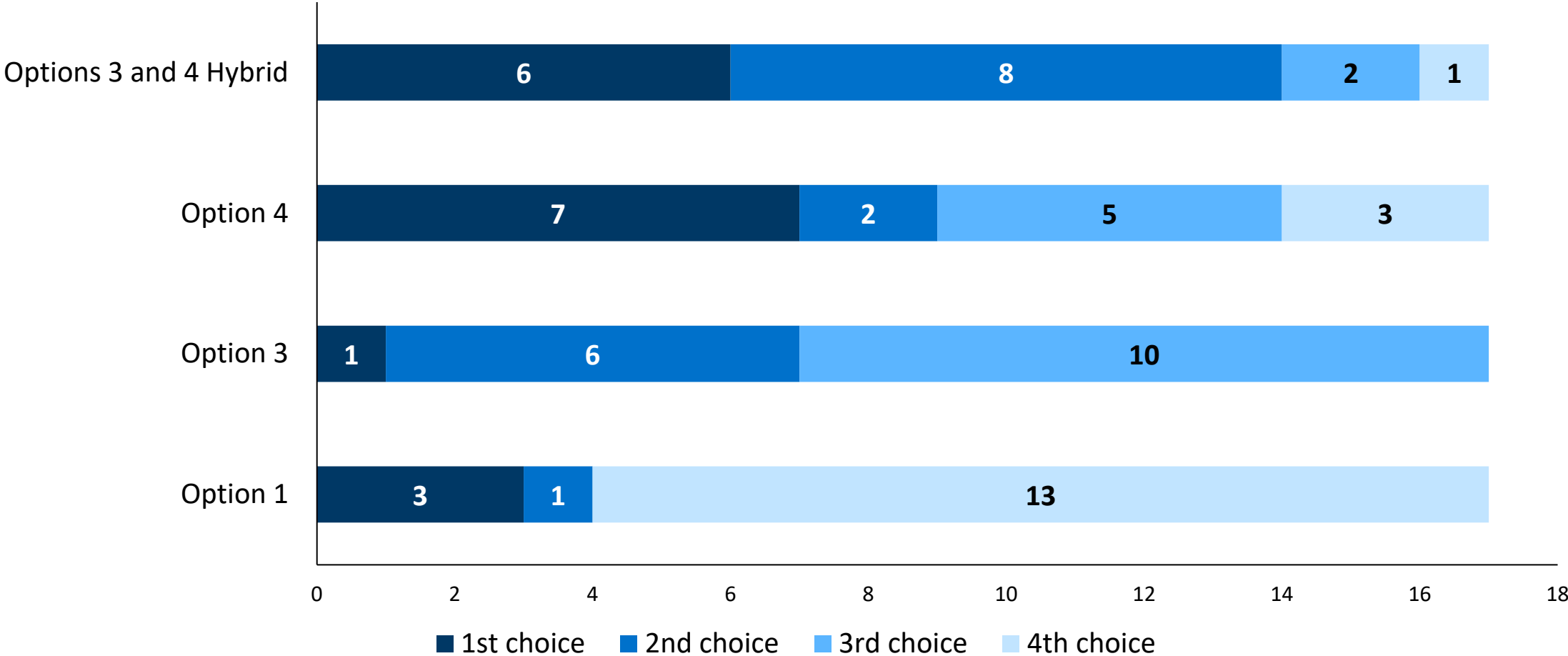
| Options | Description |
|---------|--|
| 1 | Limit projects to those types of activities that do not increase PFAS related risks (i.e., no aquatic, wetland, or nearshore habitat restoration or fishing projects) |
| 2 | Require projects that include PFAS sensitive activities to have PFAS levels below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

**Not PFAS sensitive
(does not increase
exposure risk)**

**PFAS sensitive
(may increase
exposure risk)**

**3+4
Hybrid
Option**

Survey Results: PFAS Consideration Options



Qualitative Work Group Feedback

- Respondents generally agreed that PFAS related risks should be considered during the project screening and/or evaluation process
- The hybrid approach was preferred by many because it would screen out only those projects with the highest risk of harming wildlife, while allowing all other projects that could substantially benefit wildlife to be considered
 - Did not want to be overly conservative
- Respondents noted that PFAS risks and mitigation strategies should be addressed in project proposals
- Those that chose Option 1 felt it was important, given the nature of the settlement, to avoid causing any further PFAS injury to wildlife through Priority 2 funded projects

Qualitative Work Group Feedback

- “The hybrid approach appears to allow some flexibility to PFAS sensitive projects, while limiting the risks to wildlife (and fish consumers) in the most contaminated areas. I am concerned that removing all PFAS sensitive projects would relegate the process to selecting projects that do not improve the health of wildlife.”
- “It would be counter-productive to exclude project proposals because of PFAS presence. The proposals do need to discuss how ‘inadvertent outcomes’ are addressed.”
- “While we do not want to increase the public's exposure to PFAS, I am hesitant to fully exclude projects with PFAS sensitive activities or in high PFAS areas from funding and would rather see them evaluated on a case-by-case basis during the evaluation process.”

Options Survey Take Homes

Take homes:

- Feedback suggest that the Option 3+4 Hybrid is overall the most favored
 - Option 4 also ranked highly overall
- Options 1 and 3 (as a standalone) not as favored

Evaluation Criteria Importance

Survey Results: Evaluation Criteria Weighting

(part 1)

| | Most Important | More Important | Somewhat Important |
|---|----------------|----------------|--------------------|
| 2.1.1 Benefits to injured resources and services | 13 | 2 | 2 |
| 2.1.2 Cost effectiveness | 7 | 8 | 2 |
| 2.1.3 Consistency of the project with local, county and regional planning | 5 | 6 | 6 |
| 2.1.4a Minimizes potential for additional wildlife injury and fish consumption related human health risks <i>(does not include PFAS related risk of injury – for Options 1 and 3)</i> | 1 | 10 | 6 |
| 2.1.4b Minimizes potential for additional wildlife injury and fish consumption related human health risks <i>(includes risk of PFAS related injury – for Option 4 or the 3+4 hybrid)</i> | 9 | 6 | 2 |

Survey Results: Evaluation Criteria Weighting

(part 2)

| | Most Important | More Important | Somewhat Important |
|---|----------------|----------------|--------------------|
| 2.1.5 Minimizes adverse community impacts | 3 | 9 | 5 |
| 2.1.6 Community engagement | 3 | 4 | 10 |
| 2.1.7 Benefits multiple municipalities | 3 | 7 | 7 |
| 2.1.8 Equity and environmental justice | 6 | 3 | 8 |
| 2.1.9 Public access | 7 | 6 | 4 |
| 2.1.10 Self-sustaining benefits | 6 | 8 | 3 |

Survey Results: Evaluation Criteria Weighting

(part 3)

| | Most Important | More Important | Somewhat Important |
|---|----------------|----------------|--------------------|
| 2.2.1 Monitoring plans | 4 | 5 | 8 |
| 2.2.2 Measurability of project benefits | 3 | 6 | 8 |
| 2.3.1 Matching/leveraging funding | 5 | 4 | 8 |

Overall Work Group Feedback

- “Most Important” criteria
 - Benefits to injured resources and services
 - Minimizes potential for additional wildlife injury and fish consumption related human health risks (incorporating PFAS related risk of injury)
- “More Important” criteria
 - Cost effectiveness
 - Minimizes potential for additional wildlife injury and fish consumption related human health risks (incorporating only non-PFAS related risks of injury)
 - Minimizes adverse community impacts
 - Public access
 - Self-sustaining benefits

Overall Work Group Feedback

- “Somewhat Important” criteria
 - Consistency with local planning
 - Community engagement
 - Equity and environmental justice
 - Benefits multiple municipalities
 - Monitoring plans
 - Measurability of project benefits
 - Matching/leveraging funding

Qualitative Work Group Feedback

While there were not as many comments on the criteria, respondents noted:

- All draft criteria were appropriate for inclusion
- Their rankings were striving to strike a balance between the potential risks and benefits of proposed projects
- Concern that smaller communities may find doing well on certain criteria more challenging (e.g., matching funding, monitoring plans, self-sustaining benefits, community engagement)

Qualitative Work Group Feedback

- “My focus on applying weights to the criteria is to 1) minimize the likelihood of injuring wildlife (i.e., first do no harm) with projects and 2) scientifically study the actual impacts of the projects. I think that all of the above criteria are appropriate for inclusion.”
- “If something is seemingly injurious or appears like it will cause more damage to wildlife or people, of course we don't want that but, if a project could in the end do the opposite, I want to see those projects included and explained, not ruled out in screening criteria.”
- “Resources will not be the same in the various affected communities so the process of even submitting a proposal, finding and getting matching funds, meeting monitoring standards, making sure something can be sustainable, and encouraging a high level of community involvement will look totally different and need to be taken into account.”

Questions?

- Questions on the survey results?

