

3M PFAS Settlement Priority 2 Grant Program

2024 Letter of Intent Proposal Form

The purpose of the Letter of Intent (LOI) is to give the project proposer an opportunity to briefly explain the activities and outcomes of their proposed project. The Letter of Intent will allow DNR and MPCA to assess whether the proposed projects are eligible for Priority 2 funding, and provide feedback early in the application process. If a Letter of Intent satisfies the eligibility requirements, the proposer will be invited to submit a full grant application.

Instructions:

1. Read the [Request for Proposal](#) before completing this form.
2. Completed proposal must be limited to the completion of this form.
3. Save the completed Letter of Intent locally, and email to 3MPriority2@state.mn.us.

All submissions MUST be received by the deadline of 4:30 p.m. CST on Friday, April 4, 2025.

PROJECT INFORMATION

Project Name: LMRWMO Priority Lakes Contaminant Testing

Approximate latitude/longitude (decimal degrees; please approximate the project's 'center') Multiple locations, see map.

Attach a map of the project location. Be sure to include all areas in which the project will conduct activities.

APPLICANT CONTACT INFORMATION

Organization: Lower Mississippi River Watershed Management Organization (LMRWMO)

Applicant Website: www.LMRWMO.org

Name/Title of Primary Contact Joe Barten, LMRWMO Administrator

Telephone (952) 212-2266

E-mail: Joe.barten@co.dakota.mn.us

Name/Title of Authorized Agent (if applicable): Joe Barten, LMRWMO Administrator

Telephone: (952) 212-2266

E-mail: Joe.barten@co.dakota.mn.us

☒ I have the authority to apply for this grant on behalf of the organization.

Other collaborating organization(s) and their role(s):

The LMRWMO has received funding commitments from partner Cities including Saint Paul, South St. Paul, West. St. Paul, Lilydale, and Mendota Heights that will provide matching funds totaling \$15,000 for this effort.

PROJECT CATEGORY

Required: Select the primary project category (select at least one primary goal as required to receive funding)

- ☐ Restoration of wildlife and habitats
- ☒ Recreational fishing related projects
- ☐ Non-fishing related outdoor recreation projects

ESTIMATED FUNDING REQUEST AMOUNT

Anticipated Grant Request:

Anticipated Total Project Cost:

PROJECT SUMMARY

Include a high-level description of the project, activities, goals, needs, and/or outcomes. Attach or provide hyperlinks to plans and other supplementary information, as appropriate. Please note that project details are not expected to be finalized until later in the application process, nor will the responses in this LOI form be factored into the final award decisions. However, a descriptive project summary will lead to better individualized feedback on this LOI from members of the DNR and MPCA Evaluation Team.

The LMRWMO Board believes emerging contaminants pose a threat to humans as a potential carcinogen as well as to wildlife through the accumulated presence of these contaminants in waterbodies, fish tissue, and lake sediment. This threat is especially direct as it relates to fish consumption by the public. This project provides a great opportunity to determine the presence and potential impact of contaminants of concern in LMRWMO waterbodies and fish tissue, to the benefit of residents and wildlife of the LMRWMO.

To accomplish such an effort, the LMRWMO is proposing the following general scope of work.

- Investigate and review existing information related to contaminants of concern (PCBs, PFOS/PFOA, PAH and other Contaminants) within fish tissue and within the water column and sediments of LMRWMO waterbodies.
- Establish priorities for monitoring/investigation based on recreation and human health concerns for LMRWMO priority waterbodies as shown on the attached map.
- Perform monitoring of prioritized LMRWMO waterbodies for contaminants of concern, such as PCBs, PFOS/PFOA, PAH, and other potential and related contaminants of human health concern.
- Target investigation to fish tissue, water, or lake sediment monitoring based on the appropriate contaminant of concern for that waterbody, if known.
- Provide a report summarizing the results of the investigation and specific next steps, if any, for each waterbody, to share with the LMRWMO, Member Cities, and State agencies.

LETTER OF INTENT SCREENING CRITERIA

Based on the information provided in this LOI form and attachments, the DNR and MPCA will determine whether proposed projects meet each of the screening criteria. The eight pass/fail screening criteria are listed and described below. DNR will invite proposers to complete a full grant application if the LOI passes **all** screening criteria.

1. Lead applicant is an eligible organization. Check the type of organization applying:

- ☐ Local units of government (e.g., city, township, county)
- ☒ Soil & water conservation, watershed, and lake improvement districts
- ☐ Area-wide agency, including regional planning agency
- ☐ Nonprofit organizations
- ☐ Public school district and nonprofit schools
- ☐ Institutes of higher education (public and nonprofit)
- ☐ Port authorities
- ☐ Tribal governments
- ☐ Federal agencies
- ☐ State agencies (excludes direct funding to the DNR and MPCA; however, agencies may participate as collaborators)

2. Addresses losses of natural resources and services.

Describe how the project will address one or more of the settlement goals for Priority 2:

- Restore, protect, and enhance aquatic and terrestrial resources, wildlife, and habitats.
- Increase understanding of fish tissue contamination, improve communication about PFAS-based fish consumption advisories, and identify and enhance alternative, non-contaminated fishing areas.
- Improve and enhance outdoor recreational opportunities.

This proposed project directly addresses Goal 2 from the settlement. This project will increase the understanding of fish tissue contamination within LMRWMO waterbodies. LMRWMO staff have already confirmed that State and regional government organizations do not plan to monitor local waterbodies such as these for the presence of contaminants of concern. This means that locally led testing is necessary for the public to be aware of potential concerns.

This project will also improve communication about PFAS-based fish consumption advisories along with other potential contaminants of concern. If lakes are identified to have contamination via testing through this effort, the LMRWMO can work with partners to provide signage noting the presence of pollutants for the public to make informed decisions on consuming fish and recreating on that waterbody.

Lastly depending on where contamination is identified, the LMRWMO can help local governments better prioritize, identify, and enhance alternative, non-contaminated fishing areas on waterbodies where contamination was not identified, via public education and outreach efforts such as signage.

3. Is technically and administratively feasible.

Please detail how the proposed project is technically and administratively feasible. Although project details are not expected to be finalized until later in the application process, the basic elements of the project should be developed to ensure completion given the time frame and funding proposed. Evidence of a project's feasibility can include, but is not limited to, the following:

- The techniques/approaches/methods being used are well-established;
- Your organization, collaborators, or partners have relevant experience with the proposed activities;
- Cost and time estimates are based on other, similar projects that have been successfully executed or described in recent planning documents;
- The project has the ability to secure relevant landowner support for the project, as needed (required in full grant application).

The LMRWMO has discussed with and received general approval from the funding Cities to pursue this project. The LMRWMO has already sought out and received the appropriate and well established testing protocols from State agencies to provide valid data during testing. The LMRWMO will partner with a qualified consultant to collect samples and a qualified lab to test samples.

4. Would not jeopardize public health or safety.

Projects must not threaten public health or safety. For example, proposed fishing projects must include communications consistent with the current MDH FCA guidelines.

☒ I attest that the project will comply with all relevant public health and safety regulations.

☒ I attest that the project meets one of the following:

- a. Would NOT increase public access to fishing, OR
- b. Would increase public access to recreational fishing and would include communications about fish consumption related risks consistent with current [MDH FCA guidelines](#).

5. Complies with applicable laws, regulations, and rules.

Projects must be legal and adhere to applicable federal, state, local, and tribal laws, rules, and regulations, including meeting all State ADA requirements.

☒ I attest that the project will comply with all applicable federal, state, local, and tribal regulations.

6. Unlikely to be completed without Priority 2 funding.

Priority 2 funds may not be used as a substitute for traditional sources of funding or for required actions. However, Priority 2 funds can supplement the traditional sources if the proposed project would demonstrate additional resource benefits.

☒ I attest that Priority 2 funding would not be used to supplant existing funding.

7. Located within the Priority 2 Project Area. If located in a Limited Project Area, proposed project is consistent with the qualifying project activities.

The majority (>50%) of a proposed project area or a project's activities must occur within the Priority 2 Project Area (see Appendix B of RFP).

Limited Project Areas exhibit levels of PFAS contamination that are not compatible with certain types of project activities or are under active remedial investigation and other restoration initiatives. PFAS-sensitive activities include aquatic, wetland, or nearshore habitat restoration projects and recreational fishing projects. Projects involving PFAS-sensitive activities must take place only outside of the following Limited Project Areas (see Appendix B).

☒ I have attached a map showing the geographic location(s) of the proposed project

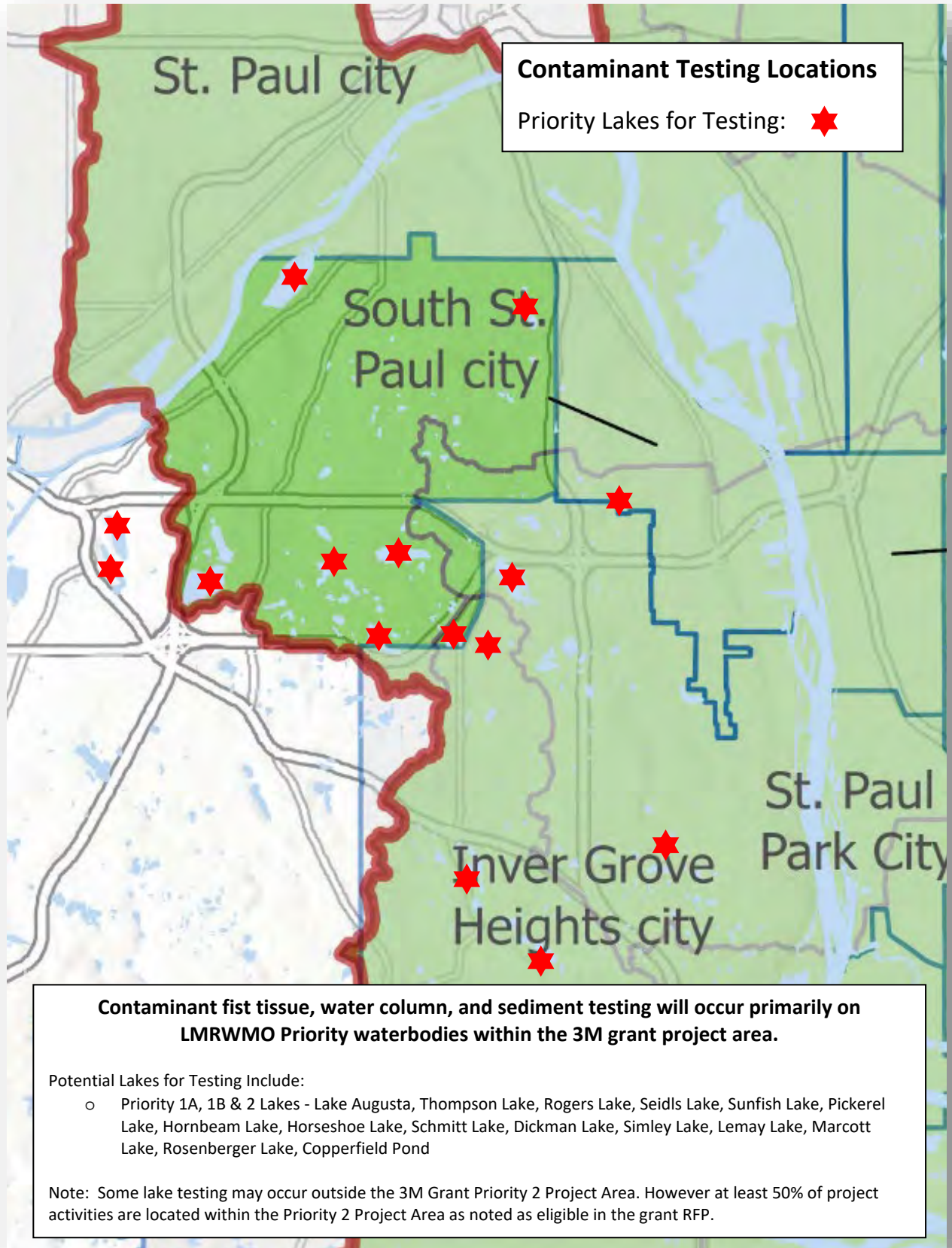
8. Not expected to be impacted by planned remediation actions.

Proposed projects that are located in areas in which remediation is planned will not be eligible for Priority 2 funding.

- *MPCA and DNR will assess potential remediation taking place within ¼ mile of the proposed project based on information in the "[What's in My Neighborhood](#)" tool that identifies sites labeled as "investigation and cleanup" within ¼ mile of the project location.*

Project Map

LMRWMO Priority Lakes Contaminant Testing Locations



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PROJECT INFORMATION

Project Name: Thompson and Seidls Lake Water Quality Improvement and Aquatic Habitat Restoration

Approximate latitude/longitude (decimal degrees; please approximate the project's 'center') 44°54'36"N 93°04'12"W &
44°52'59"N 93°03'12"W

Attach a map of the project location. Be sure to include all areas in which the project will conduct activities.

APPLICANT CONTACT INFORMATION

Organization: Lower Mississippi River Watershed Management Organization (LMRWMO)

Applicant Website: www.LMRWMO.org

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☒ I have the authority to apply for this grant on behalf of the organization.

Other collaborating organization(s) and their role(s):

Dakota County, City of West St. Paul, City of South St. Paul, City of Inver Grove Heights are all landowners and would provide long term management, funding, and operation of the proposed project.

PROJECT CATEGORY

Required: Select the primary project category (select at least one primary goal as required to receive funding)

- ☒ Restoration of wildlife and habitats
- ☐ Recreational fishing related projects
- ☐ Non-fishing related outdoor recreation projects

ESTIMATED FUNDING REQUEST AMOUNT

Anticipated Grant Request: \$1,491,000

Anticipated Total Project Cost: \$1,551,000

PROJECT SUMMARY

Include a high-level description of the project, activities, goals, needs, and/or outcomes. Attach or provide hyperlinks to plans and other supplementary information, as appropriate. Please note that project details are not expected to be finalized until later in the application process, nor will the responses in this LOI form be factored into the final award decisions. However, a descriptive project summary will lead to better individualized feedback on this LOI from members of the DNR and MPCA Evaluation Team.

Thompson and Seidls Lake exhibit poor water quality (high total phosphorus and chlorophyll-a and poor water clarity). Thompson Lake is routinely monitored by the LMRWMO and was included in the Lower Mississippi River WRAPS Report (<https://www.pca.state.mn.us/sites/default/files/wq-iw8-43e.pdf>) which identified a need to further evaluate internal phosphorus loading and reduce watershed phosphorus loads to improve water quality (page 44 Lower Mississippi River WMO WRAPS Report). Seidls Lake is routinely monitored by the LMRWMO and demonstrates poor water quality (<https://lmrwmo.org/wp-content/uploads/2024/01/2022-Lake-Stream-Monitoring-Reports.pdf>). Both lakes are shallow and dependent on a diverse, healthy submersed aquatic plant community and improved water clarity to maintain habitat and overall ecological integrity. The goal of the project is to improve water and habitat quality in the lakes by increasing water clarity, leading to increased diversity and abundance of aquatic plants.

Thompson and Seidls Lake offer a unique opportunity to demonstrate in-lake management techniques that cost effectively address both internal and external phosphorus loading resulting in immediate water quality improvements. These improvements often lead to increased diversity and expansion of the submerged aquatic plant community, increasing the habitat value of the lake. We propose improving water quality in Thompson and Seidls Lakes by eliminating anoxia at the sediment surface and stripping total phosphorus (TP) out of the water column. Our innovative approach is to combine full-lift, ice-preserving, hypolimnetic aeration with ultra-low, continuous dosing of alumina (geochemical augmentation).

Anoxia and internal P loading are strongly linked water quality problems that often persist despite watershed improvements. Since the 1990s, dozens of drinking water reservoir projects have driven innovations that eliminate internal nutrient loading where there is little to no possibility of controlling external loading. Vadnais Lake and Pleasant Lake (Vadnais Heights) use hypolimnetic oxygenation with geochemical augmentation (ferric iron) to completely stop internal nutrient loading and prevent cyanobacteria blooms. Geochemical augmentation with alumina has been successfully used in a Shorewood, MN stormwater pond since 1997, reducing pond TP concentrations from 170 to 40 µg/L. Similar results were obtained in a small Kansas lake (2016) and three drinking water reservoirs in Georgia (2020).

The purpose of this project is to design and implement aeration with geochemical augmentation in Seidls and Thompson Lakes. To size and design the system, sediment cores will be collected to determine sediment chemistry and sediment oxygen demand (SOD) to size and design the aeration system and determine the dose rate for the coagulant. Facility location and design will also be included in the first step. Following design and facility location, the system will be installed, including pump calibration, initial chemical delivery, and facility start up. Two years of system implementation are anticipated during the grant period. Monitoring will be conducted throughout the operation period to ensure compliance with water quality standards and to measure effectiveness.

All technologies are in the public domain. We propose closely engaging DNR and MPCA to review results on an ongoing basis. With agency inputs we propose using project results to create public domain design guidelines for similar projects in the future.

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2. Addresses losses of natural resources and services.

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- Improve and enhance outdoor recreational opportunities.

Thompson Lake lies within Thompson County Park and is a popular regional water resources amenity and destination for residents of the city and surrounding communities, featuring picnic areas, hiking and biking trails as well as educational opportunities for the public and nearby St. Croix Lutheran school. The watershed tributary to the lake is fully developed and the lake is impaired for excess nutrients and chloride. The LMRWMO, City, and County have heavily invested in studies and projects totaling over \$2M to improve water quality and remove PAH-contaminated sediments at the lake in the last 10 years.

Seidls Lake is surrounded by parkland for the Cities of Inver Grove Heights and South St. Paul. The lake has a fully developed watershed and is impaired for excess nutrients. The lake is a popular regional amenity and recreation destination for nearby communities. The lake does not have a natural outlet and has a history of shoreline erosion, flooding, and declining water quality over the past 10 years. The LMRWMO and the two Cities have invested heavily to improve water quality with eight large scale stormwater and habitat improvement projects and a lake outlet installed, totaling over \$2.5M in cost.

Both lakes are classified by the Lower Mississippi River WMO as Priority 1-A lakes and the “highest recreational value” lakes within the Lower Mississippi River WMO. Even with the prior efforts and investments noted above, improved water quality and aquatic habitats have still not been realized for both lakes. This is why the LMRWMO wants to pursue this 3M grant opportunity, to look at in-lake efforts to improve water quality and restore this precious aquatic resource and habitat. We see this grant proposal and project as the logical next step since so much work has already been done to treat stormwater runoff from the watershed.

3. Is technically and administratively feasible.

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The LMRWMO has discussed with and received general approval from all lake landowners to pursue this project, including engineering staff from West St. Paul, Dakota County, South St. Paul, and Inver Grove Heights. The land surrounding the lakes is entirely publicly owned by these entities, who are invested in improving the water quality and aquatic habitat of these lakes. We will engage technical experts for this project from both Barr Engineering and Jacobs Engineering. Together, these offer staff who are experienced leaders in alum treatment, aeration technology released to public domain, alumina geochemical augmentation technology, engineering and limnology, as well as MN, National, and international reservoir and lake water quality improvement and aquatic restoration. Cost estimates are based on other similar projects that have been successfully executed. This will be a truly collaborative and unique project to improve water quality and aquatic habitat.

4. Would not jeopardize public health or safety.

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☒ I attest that the project will comply with all relevant public health and safety regulations.

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Project Map

Thompson and Seidls Lake Water Quality Improvement and Aquatic Habitat Restoration Project

