

3M PFAS Settlement Priority 2 Grant Program Application

Applicant Organization:

Applicant Website:

Name/Title of Primary Contact:

E-mail:

Name/Title of Authorized Agent (if applicable):

E-mail:

INTRODUCTION AND BACKGROUND

This grant application can only be completed after previously submitting a Letter of Intent (LOI) and receiving DNR confirmation that the LOI meets the required threshold. Applicants are strongly encouraged to thoroughly review the Request for Proposal (RFP) before submitting an application. All projects will be reviewed by the DNR and MPCA Evaluation Team using the evaluation criteria detailed in the RFP. These criteria have been incorporated into this application form. A complete application will consist of the following:

1. Application form (PDF)
2. Budget table (Excel)
3. Letters of support (for applications involving multiple collaborators; any format acceptable)
4. Completed appraisal and DNR Property Information Summary (if project involves the purchase of property)
5. Preliminary designs and other supplemental information (as applicable; 10-page limit)

Instructions:

- Save this form locally on your computer before completing the application.
- Limit responses to the text boxes provided (text not visible within the provided boxes will not be reviewed).
- Submit the application electronically to the email address 3MPriority2@state.mn.us **before the deadline noted online at mndnr.gov/grants/3mp2**. The completed application form and other documents listed above may be submitted as separate files attached to the same email.

DNR and MPCA are not responsible for any technical or logistical problems causing an application to be received late. Applications received after the deadline will not be eligible for consideration.

Successful applicants are expected to be notified in Spring of 2026. If necessary, the Evaluation Team may contact applicants for additional information on project scope or scale. The DNR and MPCA commissioners will consider the Evaluation Team recommendations, availability of funding, and funding priorities, and will determine the final selection of projects to receive funding. The State reserves the right to offer grant amounts that differ than the applicant's request. If awarded funds, grant agreements will be based on the template grant agreements found on the Office of Grants Management webpage, [here](#) (Local units of government will use the *Municipal Grant Contract Agreement*. Non-Governmental Organizations will use the *Competitive Grant Contract Agreement for Non-Governmental Organizations*).

PROJECT NARRATIVE

Respond to each prompt and provide relevant supporting information. Limit responses to the space provided.

Project Information

Identify the primary category for this project. Determine the main category that best aligns with this project. If the proposed project includes aspects from multiple categories, choose the category where the majority of the project's benefits would be focused. **Choose only ONE category.**

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

If the proposed project would also contribute to one or both of the other categories, indicate those secondary categories here:

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

Project title. This should align with the title of the LOI (unless scope adjustments requested by MPCA and DNR warrant updates to the title).

Sunfish Lake Fish Consumption Advisory
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Project description, part 1. First, provide a high-level narrative description of the proposed project and its expected outcomes. Attach or include hyperlinks to relevant conceptual designs, pictures, maps, and other supplementary information, as appropriate.

This Project will determine the level of PFAS in the fish tissue in Sunfish Lake, provide the basis for determining what fish advisory language is necessary, publish the information, and post signs for anglers. JUSTIFICATION FOR DOING THE WORK: Anglers need to know whether the fish caught in Sunfish Lake are safe to eat, or not. JUSTIFICATION FOR FUNDING FROM PRIORITY 2 ALLOTMENT: Sunfish Lake has been contaminated by PFAS, almost certainly from the closed Washington County Landfill which is adjacent to Sunfish Lake Park.

In the past, Sunfish Lake was a locally-popular fishing destination, in spite of not having a public boat launch. The lake surface elevation (869 ft OHW) level tends to vary with annual precipitation. During periods of higher precipitation the surface extent increases by several acres from under 50 to over 70, and the fish population / average size increases. In years of extended ice cover the fish population has suffered from winter kill. A fish survey done in 2018 (<https://sminc-lake-elmo.org/citizen-science-reports/>) found only a plethora of sunfish up to 7.5 inch (cm) length. Recently goldfish (ornamental carp) have been observed but an organized survey has not been repeated. It would be logical to collect both species for PFAS testing, since both are of interest to local anglers who would be interested in consuming the fish.

Water testing shows that the PFBA (perfluorobutyrate,) is the most prevalent PFAS in Sunfish Lake, with smaller amounts of PFOS (perfluorooctanesulfonate) and PFOA (perfluorooctanoate). Based on the most recent test value ranges, and an estimated water volume of about 500,000,000 liters, there is approximately 1-2 Kg of PFBA, 60 g of PFOA and 25 g of PFOS in the water of Sunfish Lake. These estimates do not include any PFAS that may be in the organic or inorganic sediment layers, plant tissue, or animal tissue. Link to page with test result details - <https://sminc-lake-elmo.org/proposal-sunfish-lake-fish-advisory/>

It has not been possible to confidently predict the level of PFAS in fish based simply on the results of water testing, so it is necessary to collect the appropriate fish samples and run the PFAS concentration tests on them.

There continue to be very significant changes in the understanding of possible harm caused at different levels of PFAS, an ongoing decrease in detection limits for PFAS testing, and in the legal basis for PFAS regulations. It is logical to plan to do a retest in three-four years to update the fish advisory to take into account possible changes in the science, changes in conditions in the lake's fish population, and changes in regulatory action.

Due to variations in weather patterns which control the duration of ice cover, it may not be possible to collect enough fish in a particular year to do the testing, so the timeline and budget spreadsheets show date ranges allowing for these variables.

Project Description, part 2. Second, in the table provided below, list the proposed project activities and their estimated completion dates. Include as much detail as is feasible at this stage, but at a minimum, include major project activities. Activities listed below should be consistent with activities listed in Attachment A – Budget Spreadsheet. Use the applicable number of rows. Assume a start date no earlier than July 1, 2026, and note that projects must be completed within five years.

Activity	Completion Date
Assume that project is approved 6/30/26 Grant Administration and Contract Management.	6/30/2031
Request / obtain Consultant bids for collection and testing fish tissue, submitting result, etc	8/1/2026
Contractor Implements fish collection and testing, submits results to MPCA, receives advisory caution language	8/1/2028
Educational / Engagement Events and publicity, obtain and post the signs	10/15/2028
Operation and Maintenance - not expected unless signs are damaged and need replacement	6/30/2031
Second round of bidding, awarding, fish collection, testing, sample submission and completion of testing, receive the results, publish the updated advisory	6/01/2031
Engagement / Education activities	6/30/2031

Project location. Provide details about the location of the proposed project, including the area(s) in which project activities would be implemented. Attach or include an associated map that clearly labels all relevant locations. At least 50% of project activities must take place within the Priority 2 Project Area (defined in the RFP).

Link to map showing the location of Sunfish Lake in Lake Elmo MN: <https://maps.app.goo.gl/35FNGEZ34cRhCPGL9>

Project scalability. Does this proposal have the ability to be scalable? For example, if the proposal were to receive 50% of the requested funding, how would that affect the proposed activities and why?

With 50% of the requested funding, it should be possible to do the first collection and testing of two species, and establish a fish advisory for those species. With the entire amount requested, the updated testing and publication of revised fish advisory can be completed for better guidance in the future based on regulatory advances and possible changes in PFAS levels.

Project collaborators. Use the table below to identify collaborating organizations that would be involved in project design and/or implementation and describe their specific roles. Letters of support are required from all collaborators. In addition, if the proposed project would be conducting activities on lands owned by other municipalities, groups, or individuals, letters of support from landowners are required, and such landowners should be identified in the table below. Letters can be submitted along with this application in any format.

☒ I acknowledge that letters of support from all collaborators and landowners must be submitted with this application.

Name/Organization	Role	Receiving P2 Grant Funds? (Yes/No)
City of Lake Elmo, Public Works Dept	Land Owner, Land Manager	No

Evaluation Criteria

Respond to each prompt and provide relevant supporting information. Limit responses to the space provided.

- 1. Benefits to injured resources and services.** Describe how the project would deliver benefits to one or more natural resources and/or services in the Priority 2 Project Area that were injured by PFAS released by 3M, demonstrating a central focus on restoring those resources or services. (Injured natural resources and services include, but are not limited to, terrestrial, wetland, and aquatic habitats, wildlife, and nature-focused outdoor recreation opportunities.) Describe all such benefits to injured natural resources and/or services, and describe in detail how project activities would yield expected benefits. In addition:
 - If proposing a habitat protection/conservation project, also provide information on how imminent the threat of development is to the parcel(s) in question.
 - If the proposed project is part of a larger project beyond the present proposal, specifically describe the additional benefits that would result from Priority 2 funding.

This project would provide the benefit of clear direction about whether anglers and their families could safely eat fish caught in Sunfish Lake, or whether it should be designated as a "Catch and Release Only" fishing area.

If the co-pending proposal for the Sunfish Lake Boardwalk is awarded, there will be better access to this lake, more people would be able to reach the lake to fish, and a science-based advisory would be more important.

Sunfish Lake Park is covered by a Conservation Easement agreement between the City of Lake Elmo and the Minnesota Land Trust, prohibiting most development in this part of the Park except for a limited length of trails.

<https://sminc-lake-elmo.org/wp-content/uploads/2024/05/MN-Land-Trust-Conservation-Easement.pdf>

- 2. Cost.** Provide a comprehensive estimate of total project costs and requested funding amount for the proposed project in Attachment A – Budget Spreadsheet. Costs must be realistic and adequate for the project needs and timeframe as well as expected project benefits. Be aware that all grantees will be responsible for completing the project if total costs exceed the funding provided.

☒ I acknowledge that Attachment A – Budget Spreadsheet must be completed and submitted with this application.

- 3. Consistent with local, county, state, and regional planning.** Describe how the project is consistent with existing local, county, state, and/or regional natural resource and recreational planning efforts. Include references to existing plans (including web links and page numbers) and explain how the project is identified in or would work synergistically with these plans.

Sunfish Lake Park is considered the "gem" of the Lake Elmo park system. With a rapidly increasing population, the establishment of the Sally Manzara Interpretive Nature Center in 2018, and particularly the more recent addition of bike trails (2021), the usage of this Park has increased at least 10-fold over the past few years.

The 2024 Lake Elmo Parks Master Plan clearly designated Sunfish Lake Park as an important part of the Lake Elmo Park System, and includes the installation of a "fishing pier" as a desirable amenity in the future.
<https://www.lakeelmo.gov/DocumentCenter/View/448/Parks-Master-Plan-PDF>

There appears to be no mention in existing local planning of creating a fish advisory for Sunfish Lake. Many visitors ask about fishing in the lake, but we have no basis to answer their question - can we eat the fish?

- 4. Benefits multiple municipalities.** Identify the specific cities or townships that would receive substantial benefits from the project. Projects benefiting multiple cities or townships may physically cross municipality boundaries or may be located in areas used by residents from multiple municipalities. Clearly explain how each of these cities or townships would benefit from the project's implementation.

There is no documentation of the domiciles of visitors to Sunfish Lake Park (no entry fee, no staffed entrance station). However, based on zip codes provided by those who sign up for our newsletter (1600 recipients), Sunfish Lake Park is utilized primarily by residents of the nearby communities - Lake Elmo, Stillwater, Oakdale, Woodbury, Maplewood, North St. Paul, and St. Paul east. Any angler from these areas would benefit from this project.

- 5. Minimizes potential for additional wildlife injury or fish consumption related human health risks.** As applicable, risks of PFAS-related injury to wildlife and to human health will be assessed based on the project location and proposed project activities. The proposed project location and activities are requested elsewhere in this application; do not describe them again here.

Risks of non-PFAS related injury (e.g., habitat degradation, disturbance, pollution) will be assessed based on the project location, proposed project activities, and measures taken to mitigate injury. For this prompt, describe the potential non-PFAS related impacts to wildlife that may result from project activities, and describe the specific measures the project would take to minimize potential harm to wildlife and habitat.

This study will not cause any PFAS-related harm to wildlife or human health, except to the fish which are caught to be tested. A benefit to human health would occur if the fish are found to be safe to eat, there are significant benefits to those who consume them (<https://www.health.state.mn.us/communities/environment/fish/guidance/eatingfish.html>) Alternatively, if the study shows that the fish are too contaminated to be eaten, and the installed signage convinces the anglers not to eat them, that finding would also benefit human health.

Especially if the co-pending Boardwalk proposal is awarded, establishment of a fish advisory may have the effect of increased fishing, but this circumstance is unlikely to significantly reduce/harm the fish population of Sunfish Lake.

Another benefit would be to provide a place for fishing education. Even if the advisory turns out to be "Catch and Release Only" clarifying the situation would enable Sunfish Lake to become a better place for fishing education.

- 6. Provides self-sustaining benefits.** Describe the extent and type of maintenance or management, if any, that would be required for the project to yield and sustain its expected benefits over time. If maintenance or management would be required, describe non-Priority 2 funding sources and/or local support that would be available to support such maintenance and management beyond the grant period (and state the time period over which such funding or support would be available). As relevant (e.g., for habitat restoration projects), detail the specific management techniques that would be employed.

There would be little or no maintenance involved, unless the signs were vandalized and had to be replaced.

- 7. Minimizes adverse community impacts.** Describe the anticipated negative impacts of the project on human communities (e.g., increased traffic, construction noise, pollution) due to both short-term and long-term actions, including the location where those impacts would occur and how long they would last. In addition, provide a list of planned mitigation measures that would be used to minimize such impacts.

No adverse effects on human communities are expected.

- 8. Demonstrates equity and environmental justice.** Describe how the project would benefit underserved and underrepresented populations and areas of concern for environmental justice, including communities of color, Indigenous communities, residents with low income, and those with physical or mental disabilities. More specifically, provide evidence regarding how the proposed project activities would promote fairness, reduce disparities, and enhance outcomes for these communities, including ease of access. Project evaluators will consider a) the project's potential benefits as well as b) its geographic proximity to underserved and underrepresented communities* when evaluating project proposals.

*This will be evaluated using the [Understanding Environmental Justice in MN](#) mapping tool.

Since low-income groups, and communities which traditionally eat locally-caught fish, are more likely to depend on caught fish as a source of protein, a science-based fish advisory would be of benefit to them. Particularly in the case of a "safe to eat limited meals" advisory, Sunfish Lake could be an appropriate local source of fish for those who cannot eat the fish from Lake Elmo. The project location is not within the "Environmental Justice" list of census tracts in Minnesota <https://experience.arcgis.com/experience/bff19459422443d0816b632be0c25228/page/Page/?views=EJ-areas>

- 9. Includes community engagement.** Describe the planned and/or completed community outreach and/or engagement efforts associated with this project. Describe activities designed to involve community members in applicable phases of the project (e.g., design, implementation, monitoring). For those projects that anticipate substantial equity and environmental justice benefits, detail the project's engagement with underserved and underrepresented populations here.

The submission of the LOI for this proposal was discussed with City administration over the past two years and given the green light by the last 3 interim and permanent Administrators (Handt, Schroeder, Miller).

If the grant is awarded, the project will be publicized on the City's website and in the Friend's communications.

The results of the Fish Consumption Advisory study and any associated cautions will be posted on signs at the lake shore, on our website, and on other City communications.

- 10. Provides public access.** Describe whether and how the project would provide the public with access to restored resources and services upon project completion. More specifically, provide information about current land ownership of the project location, usage opportunities, and access fees, and explain how the project would alter or enhance these aspects. If the applicant believes public access is not applicable to the proposed project, indicate as such and explain why. If the evaluation team agrees with this assessment, the application will not be penalized.

Sunfish Lake Park and the shoreline of Sunfish Lake within the park are owned by the City of Lake Elmo. Access to the park is free and open during daylight hours. A new Lake Elmo City Park, Schiltgen Park, is being constructed on the Southeast shore of Sunfish Lake due to a Parks Dedication land transfer from the North Star development. It should be possible to fish in Sunfish Lake from that park as well as from Sunfish Lake Park

11. Matching/leveraged funding. List all sources and amounts of additional funding or in-kind contributions that would be used to support the proposed project in meeting Priority 2 goals. List ONLY those funding sources that would directly contribute to meeting Priority 2 goals within the grant period and clearly indicate how each funding source is relevant to Priority 2. Descriptions should be consistent with the costs identified in Attachment A – Budget Spreadsheet.

- If the proposed project is part of a larger project with a scope beyond Priority 2, costs associated with the broader project objectives are not considered as matching/leveraged funding.
- Note that while projects that would use Priority 2 funding to supplant existing funding are not allowed, Priority 2 funds can be used to expand upon or enhance activities that already have dedicated funding sources; in such cases, dedicated funding sources would be considered matching/leveraged funding as long as the activities are relevant to Priority 2.

No current funding is available for a study for fish advisory for Sunfish Lake. The Friends of Lake Elmo's Sunfish Lake Park would donate approximately 100 volunteer hours to administer the grant (in-kind donation) for such activities as obtaining bids, monitoring the progress, required reporting, etc.