Lower Minnesota River Watershed District 112 E. 5th Street, Suite #102 Chaska, Minnesota 55318



November 19th, 2025

# **Basin-Wide Evaluation and Fair Accounting of Environmental Impacts**

## Overview and Urgent Need

The Lower Minnesota River Watershed District (LMRWD), established in 1960, serves and protects the public interest and welfare across Carver, Dakota, Hennepin, Ramsey, and Scott counties. As the local sponsor for the U.S. Army Corps of Engineers' maintenance of the 9-foot navigation channel, the District bears responsibility for regulation, conservation, flood control, public engagement, and scientific monitoring in one of Minnesota's most complex and economically critical corridors.

From the outset, the District's founders recognized its critical intersectional mission—balancing economic vitality, public welfare, and environmental stewardship. A mission strained by cumulative upstream impacts and by the revenue limitations of a property tax levy based on floodplain and preserve lands. They urged future generations to expand and evolve the District's interaction with the full basin "as the need becomes evident." That need has become evident—and it is urgent.

Although the District has access to long-term datasets for certain hydrologic, sediment, and flood-related impacts, other categories of environmental stressors remain almost entirely unmonitored and unaccounted for. Industrial, commercial, residential, and agricultural activities all contribute to environmental burdens that accumulate downstream. Yet today, Minnesota lacks a standardized method to evaluate, compare, and assign responsibility for these disparate impacts.

Inside of a statutorily narrow planning window, the LMRWD is seeking support to build a **scalable**, **transferable**, **science-based fair-accounting system**—an approach that can be adopted by all watershed districts and that will guide **future impact charges**, **performance-based incentives**, **and fair funding mechanisms**.

# Unexpected Discovery of PFAS Contamination Reveals Systemic Gaps

In August 2025, during a routine permit review, the District identified a project adjacent to a federal Superfund site. All parties—project applicants, local government units, the District, MPCA, and the U.S. EPA—followed the standard submission, review, and comment process. **Every step of the regulatory system functioned exactly as designed**. And yet, none of these agencies or review mechanisms detected the imminent risk.

Only because the District Staff and Board, acting on precaution, required targeted sediment sampling did hidden contamination come to light. Laboratory results demonstrated **elevated to extremely high** 

concentrations of PFAS, with a clear conclusion: contaminants are likely discharging to the Minnesota River. These contaminants pose a significant threat to the District's water, land, fish, and wildlife resources due to their persistence, mobility, and toxicity. The report on this sampling and analysis will be published during the LMRWD's Board Meeting on November 19<sup>th</sup>, 2025.

If such a dramatic and dangerous condition can escape all standard review processes, then **how many other gaps exist in our data?** How many other contaminants, from other sectors, in other locations, remain uncharacterized? This discovery is therefore not only a PFAS issue—it is evidence of a structural, statewide problem: the absence of a reliable method to assess cumulative impacts across all land-use types and community contexts.

Waiting for the next legislative session or the next LCCMR cycle would leave the District—and the State of Minnesota—without the tools needed to prevent further harm and miss the planning window that sets the boundaries on acceptable projects for watershed to pursue in the next 10 years.

### Proposed Activities (Ready for Immediate Implementation)

- **1. Baseline Evaluation Across Multiple Contaminant Categories** Collect and validate **150 samples from across the District and basin** to assess PFOS/PFOA, microplastics, pharmaceuticals, and other understudied contaminants impacting the environment.
- **2. Solution Deployment** three types of structures will begin delivering solutions for immediate risk and long-term resilience—to ensure value at every step of deployment.
  - Notify Stakeholders and Public of Risk (Immediate, within 2026)- Inform and begin coordination with Federal, State, and Local agencies and organizations with sampling results.
  - Tag and modify permit review procedures and rules (Near-Term, Q3 and Q4 2026)- Ensure historic, and ongoing contamination is tagged in a way to ensure context is available to project reviewers.
  - Embed Solutions into Next Generation Watershed Management Plan (Mid-Term, Present-September 2027)- Primary drafting of the WMP is underway, needing development with key priorities related to valuing cumulative impacts, finding fair funding models, and filling data gaps.
  - Inform Development of a Fair-Accounting Framework (Ongoing)- Transform datasets to complement a basin-wide model that quantifies practices across all land-use sectors and real-time impacts, forming the foundation for future charges, incentives, and permitting decisions.

### **Outcomes**

Addressing PFAS—and any emerging pollutant—can no longer rely on isolated responses, fragmented authority, or regressive property tax funding models. The solution is a proactive, systems-based method that identifies risks early, quantifies cumulative impacts, and conveys the true economic costs of environmental degradation to decisionmakers. With an ever-growing set of technological tools to measure impacts, we can adopt a plan now that expands these capabilities over time and positions Minnesota to meet the next generation of environmental challenges.

Attachment A:

**Environment and Natural Resources Trust Fund Budget** 

**Emerging Issues Budget Addendum Spreadsheet** 

**Legal Citation:** 

**Project Manager:** Will Lytle, Phd, LMRWD Administrator

**Project Title:** Basin-Wide Evaluation and Fair Accounting of Environmental Impacts

Organization: Lower Minnesota River Watershed District (LMRWD)

**Project Budget:** \$347,180 \*Scalable based on hourly rates and number/type of sampling events

TRUST FUND

**Project Length and Completion Date:** 1 year; December 31, 2026

Current Date: 19-Nov-25

BUDGET ITEM	Budget	Amount Spent	Balance	Justification for Generally Ineligible
Personnel (Wages and Benefits)				
District Administrator (Engaging Key Stakeholders for Basin-Wide Adoption, thought leadership) (38 hours at \$105 per hour)	\$3,990	\$0	\$3,990	
Project Management (85 hours at \$155 per hour; 4 hours at \$180 per hour)	\$13,895	\$0	\$13,895	
Dissemination of Information to Stakeholders (45 hours at \$175 per hour; 70 hours at \$155 per hour)	\$18,725	\$0	\$18,725	
Development of phase short and long term solutions (approaches for dredging and beneficial reuse, operationalize component of WMP, assess cumulative impacts and costs of remediation) (212 hours at \$155 per hour; 200 hours at \$175 per hour; 30 hours at \$180 per hour)	\$73,260	\$0	\$73,260	
Sample Collection and Shipment (10 field excursions; 250 hours at \$120 per hour; 100 hours at \$130 per hour; 50 hours at \$190 per hour)	\$52,500	\$0	\$52,500	
Data Analysis and Summary (100 hours at \$190 per hour; 100 hours at \$120 per hour; 200 hours at \$130 per hour)	\$57,000	\$0	\$57,000	
Services and Subawards				

Contract Laboratory TBD Analysis PFOS + PFOA - 50	\$22,700	\$0	\$22,700	
Samples				
Contract Laboratory TBD Analysis Microplastics - 50	\$39,750	\$0	\$39,750	
Samples				
Contract Laboratory TBD Analysis Pharma Select List -	\$50,000	\$0	\$50,000	
50 Samples				
		\$0		
Equipment/Tools/Supplies		-	<u>_</u>	
Boat usage (\$900 per day)	\$9,000	\$0	\$9,000	
Sampling and Safety Equipment (GPS unit, flow	\$5,000	\$0	\$5,000	
meters, water quality meters, safety gear, coolers,				
calibration materials, Van Dorn, integrated sampler,				
and Eckman dredge)				
Truck usage (\$75 per day)	\$750	\$0	\$750	
	\$0	\$0	\$0	
Capital Expenditures Over \$5,000	•	•	•	
	\$0	\$0	\$0	
Printing and Publication	_		-	
Print expenses for LMRWD Board Meetings (\$100 per	\$400	\$0	\$400	
meeting, estimated 4 meetings)				
Travel Expenses In Minnesota				
Meeting Travel (4 LMRWD Board meetings and/or	\$140	\$0	\$140	
working sessions and 2 public meeting e.g., City				
Council meetings) (\$0.70 per mile, federal				
reimbursement rate)				
Truck usage (\$0.70 per mile, federal reimbursement	\$70	\$0	\$70	
rate)				
Travel Expenses Outside Minnesota	r			
	\$0	\$0	\$0	
Other	ı			
	\$0	\$0	\$0	
COLUMNITOTAL	6247 400	امد	6247 420	
COLUMN TOTAL	\$347,180	\$0	\$347,180	

SOURCE AND USE OF OTHER FUNDS CONTRIBUTED TO THE PROJECT	Budget	Spent	Balance	Status (secured, pending, or potential)
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Non-State:	TBD			
State:	\$0			
Cash-Match: LMRWD Budgeted for 2026	\$259,175			
Internal Watershed Managment Planning	\$50,000			
External/Basinwide Planning for Next Generation	\$20,000			
Watershed Managment Plan				
Legal expense related to rule enforcement &				
implementation	\$ 10,000.00			
Technical expense related to plan & rule development	\$ 5,000.00			
Municipal Coordination	\$ 20,000.00			
Monitoring	\$ 104,175.00			
River Level and Velocity Monitoring	\$ 5,000.00			
Rule Enforcement	\$ 20,000.00			
Relevant portion of Public Education/Digital	\$10,000			
Access/Citizen Advisory Committee/Outreach				
Program				
Convening, Research Review, Innovation Sprints	\$15,000			
OTHER ENRTF APPROPRIATIONS AWARDED IN THE		_		Amount legally
LAST SIX YEARS	Budget	Spent	Balance	obligated but not yet
				spent
	\$0	\$0	\$0	

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# **Organizational Description and Key Personnel**

The Lower Minnesota River Watershed District (LMRWD) operates under a consultant-based staffing model, meaning all administrative and technical functions are carried out by contracted firms rather than in-house staff. The District Administrator services are provided by Evergreen International Sustainability Solutions LLC, which provides overall administrative leadership and support. Young Environmental Consulting Firm, LLC. is the District's technical representative, and for this proposal will provide project management, coordination, and technical expertise. To accomplish the outcomes of this proposal, Landmark Environmental will be completing sampling collection, sampling shipment, and data analysis.

### Evergreen International Sustainability Solutions

Dr. Will Lytle provides administration and strategic oversight as the LMRWD Administrator. His responsibilities include management of operations, oversight of the 10-year Watershed Management Planning process, coordination with partners and consultants, and process improvement. Will's main responsibilities in this proposal will applying a nonpartisan, politically viable, systems-thinking approach to develop solutions to the District's permitting, watershed management planning, and dredge material management. Will has deep expertise in designing public/private interventions as well as advising significant multidisciplinary research programs funded by NSF, USDA, FFAR, DOE, and WFF. Will works closely with the LMWRD President and other board members who govern and preside over the LMRWD.

#### Young Environmental Consulting Group, LLC

Since 2011, Young Environmental Consulting Group has provided engineering and technical expertise to the Lower Minnesota River Watershed District (LMRWD). Their responsibilities include administering the District's permitting program, supporting the development of the District's Watershed Management Plan, managing specialized initiatives such as the Fen Program, Gully Inventory, and Feasibility Studies/Program, and overseeing the implementation and performance of construction projects. Through these functions, Young Environmental Consulting Group ensures that the District's regulatory, planning, and project activities are carried out with technical precision and environmental stewardship. The staff below will provide expertise in the following areas:

#### Overall Project Management and Grant Administration:

Lauren Salvato is an environmental scientist with more than eight years of experience leading projects, overseeing staff and developing complex plans to support water quality and emerging contaminants monitoring. Lauren has experience in local, state, and federal assignments, and her background includes water quality policy and program implementation, regional watershed level planning. Lauren also spent five and a half years as a volunteer Board member for the LMRWD.

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#### **Expertise in Permitting:**

Della Schall Young, CPESC, PMP, CTF is the Founder, Principal, and CEO of Young Environmental Consulting Group. Since 2011, Della has served as Young Environmental's ongoing technical representative for the District. She oversees permit review, watershed planning, feasibility studies, and stakeholder coordination with residents, partners, state agencies, and the Minnesota Legislature.

#### Expertise in Watershed Management Planning:

Jennifer Mocol-Johnson, is a program manager and planner with 20 years' experience in the planning and environmental field and in water and natural resources studies, watershed planning, stakeholder engagement and project management for a wide range of projects and clients. Jennifer is the project manager supporting the LMRWD's next generation watershed management plan.

#### Landmark Environmental

Landmark Environmental is a local environmental consulting group that has specialized in brownfield and contaminated sites since 2000. Landmark has proven to be a responsive and agile partner of the LMRWD. When the unexpected issue arose, as described in the project description, the LMRWD requested PFAS sampling expertise of firms in the area. Landmark Environmental was selected due to their expertise, relationship to analytical laboratories of good reputation, no identified conflicts of interest, and extremely competitive bid. Having a third party involved when sampling emerging contaminants and other suspected pollutants has been identified as a high priority for all the District's businesses and especially this proposal.

#### Eric Gabrielson, Project Manager

Eric has over 30 years of experience in environmental consulting and project management. Eric will be the point of contact with Evergreen International Sustainability Solutions and Young Environmental Consulting Group. He will ensure that project deliverables are executed on time and follow technical rigor.

### Tristin Faust Geologist, Geological Engineer EIT

Tristin has over eight years of experience in the consulting and environmental services industry. Tristin will oversee the development of a site safety plan, sampling plan in coordination with Young Environmental Consulting, and summary development of the sample results.

Jane Rogers is an environmental geoscientist with over a year of experience at Landmark Environmental. She will conduct fieldwork, ensuring samples are collected according to sample operational procedures. Jane will also ensure that samples are packaged and arrive at the analytical laboratory following quality control procedures.