

**Written comments on the proposed rules received by
the EQB during the comment period**



Minnesota Center for Environmental Advocacy

The legal and scientific voice protecting and defending Minnesota's environment

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February 23, 2011

VIA U.S. MAIL, FAX, AND EMAIL

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RE: Proposed Rule Amendment Regarding Minn. R. 4410.4300, subp. 15

Dear Mr. Larsen:

We write on behalf of the Minnesota Center for Environmental Advocacy (MCEA) and Fresh Energy in response to the Environmental Quality Board's (EQB's) request for comments on the proposed change to Minnesota 4410.4300, subpart 15. MCEA is a Minnesota-based non-profit environmental organization whose mission is to use law, science, and research to preserve and protect Minnesota's natural resources, wildlife, and the health of its people. MCEA has state-wide membership. MCEA's members live, work, and recreate in the State. They are concerned with environmental impacts from air emissions, particularly greenhouse gas (GHG) emissions, and are likewise interested in seeing that environmental review in Minnesota addresses these impacts. Fresh Energy is a nonprofit organization that works in the public interest to catalyze state and regional policy and regulation that will stimulate the technological advancements necessary for an energy system that sustains the economy, people, and the planet.

MCEA and Fresh Energy request a public hearing on the proposed rule. The proposal exempts the great majority of GHG emission sources from completing the most basic environmental review. The decision not to require these new sources to evaluate their GHG emissions while in the stages of planning their projects is of great concern to many Minnesotans.

In the comments below, we highlight the environmental impacts of increasing concentrations of GHGs in the atmosphere; address the inconsistencies between EQB's proposed rule amendment and the Minnesota Environmental Policy Act (MEPA); and outline our concerns with setting the GHG threshold for triggering the application of an environmental assessment worksheet (EAW) at 100,000 tons

per year of carbon dioxide equivalent emissions. Looking to both state law and the Council on Environmental Quality (CEQ) for guidance, we recommend revising EQB's proposed amendment to require EAWs for new stationary source facilities which *meaningfully* contribute to the pollution of Minnesota's resources and the harm of its residents. To that end, we recommend that an EAW be required for new sources/projects with direct annual GHG emissions of 10,000 or more tons and new sources/projects with combined direct and indirect (scope 2) GHG emissions of 25,000 tons or more.

I. INCREASES IN GREENHOUSE GAS EMISSIONS HAVE THE POTENTIAL FOR SIGNIFICANT ENVIRONMENTAL EFFECTS

The scientific consensus on climate change is the well documented subject of numerous reports from national and international agencies, including the Intergovernmental Panel on Climate Change (IPCC), the National Academy of Sciences, the American Meteorological Society, the American Geophysical Union, and the American Association for the Advancement of Science. This consensus attributes the rise in globally averaged temperatures to discernable human influences, particularly increases in anthropogenic greenhouse gas concentrations.¹

The environmental impact caused by increases in GHG emissions is widespread and diverse.² According to the CEQ, climate change can increase the frequency of extreme weather events (including the risk of floods, storm surges, and heat waves) and can elevate "the vulnerability of a resource, ecosystem, or human community."³ Already on a global scale, we have observed shifting plant and animal ranges,⁴ retreating glaciers, rising sea levels, and increasingly acidic oceans.⁵

The Minnesota Pollution Control Agency has similarly highlighted a number of negative impacts climate change will continue to cause in Minnesota and the Midwest:

¹ Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change (2007), *available at* http://www.ipcc.ch/publications_and_data/ar4/wg1/en/contents.html All referenced materials are publicly available on the WorldWideWeb or through on-line legal research databases such as Westlaw. MCEA considers all cited materials to be part of the administrative record for this proceeding. If the EQB requires hard copies of the cited materials, please let us know and they will be made available.

² As the science of climate change is rapidly developing, additional scientific information on foreseeable climate change impacts can be found at: U.S. Research Program, Publication and Assessment Reports, <http://www.globalchange.gov/publications/reports/scientific-assessments>

³ Council on Environmental Quality, *Memorandum to draft NEPA guidance on consideration of the effects of climate change and greenhouse gas emissions* (February 18, 2010). http://ceq.hss.doe.gov/nepa/regs/Consideration_of_Effects_of_GHG_Draft_NEPA_Guidance_FINAL_02182010.pdf

⁴ See, e.g., Terry L. Root *et al.*, *Fingerprints of Global Warming on Wild Animals and Plants*, 421 *Nature* 57-60 (2003).

⁵ Union of Concerned Scientists, *Global Warming: Frequently Asked Questions*, http://www.ucsusa.org/global_warming/science_and_impacts/science/global-warming-faq.html (last visited Feb. 14, 2010).

- During the summer, public health and quality of life, especially in cities, will be negatively affected by increasing heat waves, reduced air quality, and increasing insect and waterborne diseases. In the winter, warming will have mixed impacts.
- The likely increase in precipitation in winter and spring, more heavy downpours, and greater evaporation in summer would lead to more periods of both floods and water deficits.
- While the longer growing season provides the potential for increased crop yields, increases in heat waves, floods, droughts, insects, and weeds will present increasing challenges to managing crops, livestock, and forests.
- Native species are very likely to face increasing threats from rapidly changing climate conditions, pests, diseases, and invasive species moving in from warmer regions.⁶

Many of these changes are occurring at a faster rate and with greater intensity than scientists predicted even a few years ago.⁷ Climate disruption has therefore become a real and urgent challenge that, absent affirmative measures, will continue be injurious to Minnesota's environment, human health, and social welfare.⁸

A. The Environmental Impact Of Climate Change.

Studies suggest that climate change has already increased the size and number of forest fires and tree deaths in western states.⁹ If this trend continues, we can expect significant changes in the vegetation of forest ecosystems and the habitats of animal species.¹⁰ Similarly, warming of the Earth's lakes, rivers, and oceans are altering the habitat and food supplies for freshwater ecosystems¹¹ and marine life.¹² Climate change caused by GHG pollution is thus one of the greatest threats to wildlife in the United States and around the globe.¹³

⁶ Minnesota Pollution Control Agency, *Impacts of Climate Change in Minnesota and the Midwest*, <http://www.pca.state.mn.us/index.php/topics/climate-change/climate-change-in-minnesota/impacts-of-climate-change-in-minnesota-and-the-midwest.html> (last retrieved Feb. 23, 2011).

⁷ Judi Brawer and Matthew Vespa, *Thinking Globally and Acting Locally: The Role of Local Government in Minimizing Greenhouse Gas Emissions*, 44 Idaho L. Rev 589 (2008) ("This past September, Arctic sea ice plummeted to a record low level not anticipated by most climate models until 2050, leading scientists to predict that the Arctic could be ice-free in summer by 2030.")

⁸ See, e.g., Links and Resources at Minnesota Climate Change Advisory Group, Climate Change Impacts, <http://www.mnclimatechange.us/background-impacts.cfm>; see also, Global Climate Change and its Impact on Minnesota, <http://www.pca.state.mn.us/hot/globalwarming.html#gastrends>

⁹ See generally, Donald McKenzie, et. al, *Climactic Change, Wildfire, and Conservation*, Conservation Biology, Vol. 18, No. 4, 890-902 (2004).

¹⁰ *Id.*

¹¹ For example, warmer temperatures in Alaska have led to the disappearance of lakes and increased coastal erosion has been uncovered in the Arctic. Additionally, Freshwater ecosystems in general have shown changes in species composition, organism abundance, productivity and phenological shifts (including earlier fish migration). See C. Rosenzweig, D. Casassa, et. al, *Assessment of observed changes and responses in natural and managed systems*, Climate Change (2007).

¹² Carbon dioxide in the atmosphere is absorbed by oceans, producing carbonic acid. An increasingly acidic ocean can have negative effects on marine life, such as coral reefs, and coastal marshes that serve

Even with the relatively low temperature increases experienced in the past century, wildlife species have already become extinct, been extirpated from parts of their geographic range, or had their migratory patterns and interactions disrupted.¹⁴ Estimates now predict that “as many as one-third of species in some regions are likely to be ‘committed to future extinction’ due to climate change over the next 50 years.”¹⁵ Many treasured wildlife species in the U.S. have been placed in serious risk, including waterfowl in the northern Great Plains, crabs and oysters in Apalachicola Bay, Florida, trout and salmon in the Pacific Northwest and polar bears in Alaska. In the Midwest, where migratory birds such as the mallard duck depend upon the number of lakes available during their breeding season, higher temperatures which result in receding water levels will critical areas to rest, feed, and mate during their migratory journeys. In the Midwest, migratory birds such as the mallard duck depend upon the number of lakes available during their breeding season.¹⁶ Higher temperatures which result in receding water levels will critically affect their ability to rest, feed, and mate during their migratory journeys. Because organisms are connected through the flow of energy and cycling materials, the loss of even one species can have cascading effects upon the production and maintenance of biodiversity and the sustainability of ecosystems.¹⁷ It follows, that any new increase in GHG emissions has long-term effects on Minnesota’s environment. The EQB’s proposed rule amendment will therefore not only exacerbate the plight of endangered species, it will also jeopardize the well-being of Minnesota’s environment and threaten public health and well-being.¹⁸

B. The Effect Of Climate Change On Public Health.

The Earth’s climate is changing in ways that could have serious consequences for public health. In addition to the direct effects of higher temperatures, climate change will likely increase the number of people suffering from illness and disease, allergies, and injury due to floods, storms, droughts, and fires. Additionally, increases in GHG emissions are likely to have palpable effects on Minnesota’s economy and the well-being of Minnesota’s workforce.

Preventing Illness and Disease

Because changes in temperature and rainfall are likely to increase the range and the length of activity for insects which carry and spread diseases, the IPCC has concluded that climate change

as nurseries for fish and provide buffers from storms. See The Stimson Group, *Coastal Zones and Climate Change* (2010) available at http://www.stimson.org/images/uploads/research-pdfs/Coastal_Zones-Complete.pdf

¹³ See Chris Thomas et al., *Extinction Risk from Climate Change*, 427 Nature 145, 147 (2004).

¹⁴ See Gian-Reto Walther et al., *Ecological Responses to Recent Climate Change*, 416 Nature, 389, 394 (2002).

¹⁵ Chris Thomas et al., *supra* note 13.

¹⁶ The National Academies, *Ecological Impacts of Climate Change—The Central U.S.*, <http://dels-old.nas.edu/climatechange/central.shtml> (last retrieved Feb. 23, 2011).

¹⁷ See, e.g., Union of Concerned Scientists, *Great Lakes Communities and Ecosystems at Risk*, available at <http://www.ucsusa.org/greatlakes/>

¹⁸ See, E. Brennan, *Reducing the Impact of Global Warming on Wildlife: The Science, Management and Policy Challenges Ahead*, Defenders of Wildlife (2008).

causes greater frequency of infectious disease epidemics.¹⁹ In addition, increased flooding caused by heavy downpours can compromise the quality of water supplies by washing chemicals and other contaminants into lakes, rivers, and streams,²⁰ and can overload drainage systems and water treatment facilities—increasing the risk of waterborne diseases such as cholera and salmonella.²¹

Protecting Respiratory Health

In some parts of the United States, smog levels, and associated risks to human health, are expected to increase as temperatures rise. Smog can irritate the respiratory system, reduce lung capacity, and exacerbate asthma attacks, placing individuals with existing respiratory or heart problems at increased risk.²² Exposure to air pollution can additionally aggravate cardiovascular disease, lower the body's ability to fight infection, damage lung tissue, lead to premature death, and even contribute to cancer.²³ The World Health Organization currently estimates that urban air pollution causes 1.2 million deaths every year²⁴; this number is likely to increase if air pollutants like GHGs are not appropriately monitored. Additionally, because warmer climates promote the growth of the molds, weeds, grasses, and trees, allergic reactions for millions of people will be aggravated by increased concentrations of GHG in the atmosphere.²⁵ A recent article in the Star Tribune warned that the rising number of frost-free days in Minnesota has already led to a pronounced increase in the length of Minneapolis' allergy season: since 1995, Minneapolis' allergy season has increased by 16 days—a rate of one day per year of climate change.²⁶ While “[s]ummer sneezes and itchy eyes might seem inconsequential...[m]edical costs linked to allergy disorders total \$21 billion dollars annually in the United States.”²⁷ Failing

¹⁹ World Health Organization, *Climate Change and Human Health—Risks and Responses* (2003) available at <http://www.who.int/globalchange/publications/cchhsummary/en/>; see also E.P.A., *Climate Change, Health and Environmental Factors*, <http://www.epa.gov/climatechange/effects/health.html> (last visited Feb. 14, 2010) (noting that climate change may increase the risk of some infectious diseases, particularly diseases such as malaria, dengue fever, yellow fever, and encephalitis, which appear in warm areas and are spread by mosquitoes and other insects).

²⁰ E.P.A., *Climate Change and Society*, available at http://www.epa.gov/climatechange/downloads/Climate_Change_Society.pdf

²¹ E.P.A., *Climate Change and Health Effects*, available at http://www.epa.gov/climatechange/downloads/Climate_Change_Health.pdf

²² See E.P.A., *Effects of Air Pollutants*, <http://www.epa.gov/apti/course422/ap7a.html> (last visited Feb. 14, 2010).

²³ Physicians for Social Responsibility, *The Medical and Public Health Impacts of Global Warming*, available at <http://www.psr.org/assets/pdfs/global-warming-fact-sheet.pdf>; See also <http://globalwarming.house.gov/issues/globalwarming?id=0006> (last visited Feb. 14, 2010).

²⁴ World Health Organization, *Climate Change and Health, Fact sheet N°266* (January 2010), available at <http://www.who.int/mediacentre/factsheets/fs266/en/>

²⁵ L. Cecchi, et. al, *Projections of the Affects of Climate Change on Allergic Asthma: the contribution of aerobiology*, Allergy (2010).

²⁶ Marcotty, Josephine. *Climate Change Stretches the Sneezing Season*. Star Tribune Feb. 23, 2011, <http://www.startribune.com/lifestyle/health/116706384.html> (last visited Feb. 23, 2011).

²⁷ *Id.*

to regulate GHG emissions therefore, not only hurts Minnesota's population, it also hurt's its budget.

Lessening the Impact of Weather-Related Injuries

As average global temperatures get warmer, scientists predict severe heat waves will be more frequent and more intense.²⁸ If Minnesota's GHG emissions continue to increase at their current rates, "every summer in Minnesota toward the end of the century is projected to be as hot or hotter than 1988—the state's hottest summer on record."²⁹ When people are exposed to extreme heat, they can suffer from potentially deadly illnesses such as elevated body temperatures, heat cramps, heat exhaustion, and heat stroke.³⁰ As heat is already the leading cause of weather-related deaths in the United States,³¹ increases in the frequency and severity of heat waves will likely lead to increased heat-related mortalities. It is unsurprising then, that scientists predict the Twin Cities will experience at least two major heat waves by the end of the century which will result in more than 140 deaths (36 per every 100,000 residents).³²

The E.P.A. additionally asserts that "increased demand for air conditioning during heat waves could stress the capacity of power plants, transmission grids, and distribution systems, causing brownouts or power outages."³³ And "[b]ecause power plants also use large amounts of water, facilities located in areas where water supplies are expected to be scarce due to droughts could [also] experience operational difficulties."³⁴

Protecting the Social and Economic Welfare of Minnesota Residents

Increasing evaporation, decreased winter snow-packs and less frequent but more intense rainfalls will increase the likelihood of drought and put a strain on freshwater resources³⁵ — potentially decreasing the water levels of Minnesota's lakes, rivers, and wetlands. Reductions in freshwater resources will in turn lead to economic losses for industries that depend on healthy ecosystems.³⁶ For example, the agriculture industry may be delayed from planting due to spring flooding and

²⁸ Gerald Meehl and Claudia Tebaldi, *More Intense, More Frequent, and Longer Lasting Heat Waves in the 21st Century*, Science 13, Vol. 305 no. 5686 (August 2004).

²⁹ Union of Concerned Scientists, *Confronting Climate Change in the U.S. Midwest: Minnesota* (July 2009), available at http://www.ucsusa.org/assets/documents/global_warming/climate-change-minnesota.pdf

³⁰ E.P.A., *supra* note 21.

³¹ From 1979-2003, excessive heat exposure caused 8,015 deaths in the United States. During this period, more people in this country died from extreme heat than from hurricanes, lightning, tornadoes, floods, and earthquakes combined. Centers for Diseased Control and Prevention, *Extreme Heat: A Prevention Guide to Promote Your Personal Health and Safety*, http://www.bt.cdc.gov/disasters/extremeheat/heat_guide.asp (last retrieveied Feb. 23, 2011).

³² Union of Concerned Scientists, *supra* note 27.

³³ E.P.A., *supra* note 20.

³⁴ *Id.*

³⁵ Physicians for Social Responsibility, *supra* note 23.

³⁶ Jay Malcolm and Louis Pitelka, Pew Ctr. on Global Climate Change, *Ecosystems & Global Climate Change: A Review of the Potential Impacts on U.S. Terrestrial Ecosystems and Biodiversity* (2001).

may face additional challenges due to an increase in disease-causing pathogens, insect pests, and weeds caused by climate disruption.³⁷ Simultaneously, warmer temperatures and extreme weather may prevent certain crops from growing in regions where they previously flourished. Livestock production may also be affected as climate disruption is likely to lead to additional costs. As higher temperatures stress livestock and decrease productivity, increased costs associated with ventilation and cooling may be borne by Minnesota farmers.³⁸ Falling water levels in Lake Superior additionally threaten the port of Duluth-Superior which, in 2007 received more than 1,200 ships and 48 million tons of cargo...enough to support 2,000 jobs. Climate-induced alterations to Minnesota's natural resources will additionally increase repair and maintenance costs of State land and waterways—or conversely, lead to a decline in recreation and tourism dollars.

As “local greenhouse gas emissions disperse throughout the atmosphere and remain there for anywhere from 50 to 200 years,”³⁹ it is unsurprising that impacts on human health are predicted to be compounded by population growth and an aging population. This suggests that Minnesota's urban areas will most poignantly be affected by the health concerns associated with GHG emissions. Climate change thus, has the potential to accentuate the disparities already evident in the American health care systems, as many of the expected health effects are likely to fall disproportionately on the poor, the elderly, the disabled, and the uninsured.⁴⁰ While EQB's proposed rule amendment will affect all Minnesotans, the failure to effectively review and curb GHG emissions will especially harm Minnesota's most vulnerable populations.

C. Need For Reduction Of GHG Emissions.

Delaying reductions in greenhouse gas emissions heightens the risk to our environment and human welfare because “climate inertia commits us to large-scale, long-term ... climate change consequences before the exact nature of those consequences can be known.”⁴¹ Reducing atmospheric concentration of carbon dioxide to avoid dangerous climate disruption is a challenging task that requires multi-faceted action. While decisive action at the international and federal levels are essential to meet this challenge, state agencies, such as the EQB, must also contribute to the global warming solution by mandating the review of each Minnesotan facility that meaningfully contributes new GHG pollution to the atmosphere.

³⁷ United States Global Change Research Program, Regional Climate Change Impacts in the U.S.: Midwest Region, <http://www.globalchange.gov/publications/reports/scientific-assessments/us-impacts/full-report/regional-climate-change-impacts/midwest> (last visited Feb. 14, 2010).

³⁸ *Id.*

³⁹ *Mass. v. E.P.A.*, 549 U.S. 497, 543 (2007).

⁴⁰ U.S. Climate Change Science Program, *Human Health and Welfare in a Changing Climate: Summary and Findings of the U.S. Climate Change Science Program*, available at <http://www.climatechange.gov/Library/sap/sap4-6/final-report/sap4-6-brochure-FAQ.pdf>

⁴¹ *Mass. v. E.P.A.*, No. 05-1120 August 30, 2006., Amicus Brief for Climate Scientists In Support of Petitioners.

II. EQB'S RATIONALE FOR THE PROPOSED THRESHOLD LIMIT OF 100,000 METRIC TONS IS UNPERSUASIVE

There is no longer a legitimate debate about *whether* human-induced climate change is happening; rather, the debate has come to focus on what to do about it. The EQB's response, by proposing to amend its EAW rule, is to exempt the overwhelming majority of new projects that will emit new GHGs to the atmosphere and contribute to climate change from having to study those emissions in the environmental review process. The EQB's response is inexplicable given the mounting environmental and human health crisis that GHGs are creating and it is clearly inconsistent with MEPA's underlying purpose.

The EQB's rationale for raising the EAW threshold for GHGs to an arbitrarily chosen threshold of 100,000 tons per year of carbon dioxide equivalent emissions, is unpersuasive in light of the profound impacts GHG emissions have upon the environment and public health. Additionally, the proposed regulatory standard fails to follow MEPA's purpose and ignores the guidelines set by federal and state authorities whose purpose is closely tailored to Minnesota's objective of protecting the health and the well-being of its residents and our global ecosystem.

A. The Proposed EAW Threshold Fails To Follow MEPA's Purpose

MEPA's purposes, as expressed in the statute, include to "prevent or eliminate damage to the environment and biosphere" and to "enrich the understanding of the ecological systems and natural resources important to the state..."⁴² The Legislature, in enacting MEPA, stated that it was recognizing "the profound impact of human activity on the interrelations of all components of the natural environment."⁴³ And further declared that "it is the continuing policy of the state government . . . to use all practicable means and measures . . . to create and maintain conditions under which human beings and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of the state's people."

When the Minnesota Supreme Court first interpreted the Minnesota Environmental Rights Act, MEPA's enforcement counterpart, it quoted Aldo Leopold's concept of a "land ethic" and noted that these environmental laws changed the legal relationship between citizens and their environment: "In the Environmental Rights Act, our state legislature has given this land ethic the force of law. Our construction of the Act gives effect to this broad remedial purpose."⁴⁴ EQB's approach to environmental review triggered by GHG emissions should reflect the broad purposes the Legislature intended when enacting MEPA and aim to mitigate climate impacts.

The EQB was established to implement MEPA. It has a duty to take at face value the Legislature's mandate to "use all practicable means and measures" to balance productive human activity with the preservation of natural systems for the benefit of both present *and future* generations of Minnesotans. The scientific evidence clearly shows that steep reductions in GHG

⁴² Minn. Stat. § 116D.01.

⁴³ *Id.*

⁴⁴ *Freeborn County by Tuveson v. Bryson*, 309 Minn. 178, 243 N.W.2d 316 (1976).

emissions are required in order to preserve Minnesota's natural resources for future generations and to avoid the worst public health impacts of climate change.

The EQB's decision regarding the threshold at which environmental review will be required for projects that propose new, additional GHG emissions presents an opportunity to use "all practicable means and measures" to implement MEPA's purpose. In proposing to exempt the great majority of new projects adding additional GHGs to the atmosphere, however, EQB has ignored its mandate and run afoul of MEPA's purpose.

B. EPA's 100,000 Ton Threshold Was Selected For Administrative Convenience, And Is Not Relevant To MEPA's EAW Requirement.

The broad remedial purpose of MEPA would not be served if the GHG threshold for triggering preparation of an EAW in Minnesota was simply borrowed from EPA regulations of 100,000 tons per year of carbon dioxide equivalent emissions.

EPA's tailoring rule, adopting the temporary 100,000-ton threshold for Clean Air Act permits, explicitly stated that the cut-off was chosen to ease administrative burdens:

By raising the GHG thresholds that apply title V permitting to major sources in the affected States, this final rule will reduce the number of sources that will be issued federally enforceable title V permits and thereby significantly reduce permitting burdens for permitting agencies and sources alike in those States.⁴⁵

Nothing in EPA's rulemaking suggests that the rule should be used to determine whether a new project's GHG emissions should be part of the environmental review process.

Moreover, the EPA threshold of 100,000 tons, even if it were relevant, which it is not, is only temporary. In the initial tailoring rule, EPA proposed a threshold of 25,000 tons. That threshold was raised to 100,000 tons in order to avoid an initial administrative burden to state permitting programs.⁴⁶ EPA is committed to studying how best to lower the threshold (although it has said that it will not take final action to require permits from smaller sources until 2016).⁴⁷

Neither the tailoring rule itself nor the justifications offered by EPA in defense of the tailoring rule provide any relevant basis for EQB's proposed amendment of the EAW threshold. The tailoring rule is not designed to assist project proponents to make projects better by studying GHG emissions prior to project approval and construction. It is designed solely to ease the administrative bottleneck that would occur if existing Clean Air Act thresholds were applied to state air permitting programs.

⁴⁵ 75 Fed. Reg. 82254 (Dec. 30, 2010).

⁴⁶ *Id.*, 82257.

⁴⁷ EPA Tailoring Rule Factsheet, available at <http://www.epa.gov/nsr/documents/20100413fs.pdf>

C. EQB Has Not Provided A SONAR That Supports The Rule Amendment.

The EQB's Statement of Need and Reasonableness (SONAR) does not explain how its proposed amendment furthers MEPA's purposes. The SONAR summarizes recent federal actions, including the U.S. Supreme Court decision finding that GHGs are "air pollutants" and EPA's initial rules implementing a GHG permitting program. With regard to environmental review, the SONAR notes that MEPA requires an EAW for any source emitting more than 250 tons of an air pollutant. The SONAR then states that "the EQB believes the 250 tons per year threshold is too low with respect to GHGs."

As an initial matter, the stated purpose of the EQB's proposed amendment – its belief that the 250-ton threshold is too low – is vague and not rooted in MEPA. The SONAR should explain that MEPA requires new project proponents to study those aspects of their projects that have the potential for significant environmental effects, and that the emission of GHGs (and the failure to *steeply reduce* emissions of GHGs) has the potential for very significant effects on human health and the environment. It should likewise explain that the EAW process allows those who propose to add *new* emissions into an atmosphere that needs steep reductions in emissions, to calculate, disclose, discuss and offer ideas for mitigating those emissions prior to the project being approved. Mitigating emissions should serve at the foundation for whatever rule amendment is proposed.

As currently drafted, the EQB's SONAR fails to make any connection between the proposed rule amendment and the purpose of EQB's rulemaking authority. MEPA instructs the EQB to "use all practicable means and measures . . . to create and maintain conditions under which human beings and nature can exist in productive harmony..."⁴⁸ EQB has not shown that raising the environmental review threshold from 250 tons to 100,000 tons for GHG emitters accomplishes this purpose.

Moreover, the SONAR contains no analysis or description of the number of projects that would benefit from completion of the EAW if the threshold were at a lower level. How many additional projects would benefit from MEPA's requirements if the threshold were set at 1,000, 5,000, 10,000, or 20,000 tons? How many emissions could be avoided if more projects were brought within MEPA's ambit through the proposed rule?

The SONAR provided by EQB in support of its amendment is insufficient to support the proposal. In fact, the SONAR demonstrates that its proposed rule amendment is directly *contrary* to MEPA's purpose. The SONAR concludes that amending the EAW threshold from 250 to 100,000 tons will result in only "a few types of projects" being required to complete an EAW, citing power plants, refineries, and cement manufacturers. It then goes on to state that these large industrial sources likely "would already require EAWs" based on other mandatory categories. In other words, the rule amendment will likely ensure that *no* additional project, not otherwise required to complete an EAW for another reason, will be required to do environmental review because of GHG emissions. Thus, the EQB has proposed a rule amendment that takes an opportunity to use a "practicable means and measure" to address the

⁴⁸ Minn. Stat. § 116D.02, subd. 1.

state's most pressing environmental and human health problem and makes it completely irrelevant and impotent. This is not what the Legislature that adopted MEPA envisioned.

D. State Law And CEQ Guidance Provide More Relevant And Persuasive Authorities For Amending The EAW Threshold.

Rather than blindly adopt EPA's irrelevant permitting threshold, EQB should examine the rationale behind existing state and federal laws that share a common purpose with MEPA. Guidelines recommended by federal agencies, established by state law, and attuned to MEPA's purpose should be viewed as persuasive authorities when recommending amendments to the rules governing environmental review.

First, Minnesota law recognizes the devastating effect increasing concentrations of GHGs in the atmosphere will have on the State's resources and welfare. As a result, it is state policy, as expressed in statute, to achieve steep *reductions* in GHG emissions. In other words, it is the policy of the state to *wholly avoid* the new emissions discussed here as triggering environmental review and, beyond that, eliminate up to 80% of existing emissions over the coming decades.⁴⁹ Other Midwestern states made similar commitments.⁵⁰

Second, the state Legislature has already twice in statute identified the level at which the benefits of GHG regulation outweigh any administrative burden. With regard to high global warming potential GHGs, state law identifies 10,000 metric tons of carbon dioxide equivalent emissions as the threshold at which to require reporting to the Pollution Control Agency.⁵¹ With regard to CO₂ emissions generally, the Legislature instructed the Pollution Control Agency to set the reporting threshold somewhere between 10,000 and 25,000 tons per year.⁵²

The EQB's proposal, which appears guided only by completely undocumented concerns of administrative or other "burdens," restricts environmental review to facilities emitting GHGs at a rate *ten times* the level set in state statute. The EQB has provided no rational explanation for this departure. Because the Minnesota Legislature has selected 10,000 tons of GHG emissions as a signal for environmental concern and a level at which benefits outweigh any burdens or reporting, Minnesota's environmental review board should follow the State's guidance when amending EQB regulations or provide apt rationale as to why the State's well-reasoned, legislative protections should be overlooked.

⁴⁹ Minnesota's goals proclaim that GHG emissions shall be below 2005 levels 15% by 2015, 30% by 2025, and 80% by 2050. Minn. Stat. § 216H.02.

⁵⁰ See, e.g., Iowa C. § 455B.851(7) (establishing council to develop strategies to reduce GHG emission by 50%); Illinois Exec. Order 2006-11 (establishing advisory council to achieve GHG reductions); Ill. Governor-established GHG reduction targets (Feb. 13, 2007), *available at* <http://www.epa.gov/climatechange/wyecd/stateandlocalgov/states/il.html>; Wisconsin Exec. Order 191 (creating task force to establish reduction goals and make policy recommendations).

⁵¹ Minn. Stat. § 216H.11, subd. 2.

⁵² Minn. Stat. § 216H.021, subd. 2.

Third, the Council on Environmental Quality (CEQ), EQB's federal counterpart, has recently proposed that consideration of GHGs in environmental review should be triggered at a much lower threshold than that suggested by the EPA. Under the National Environmental Policy Act (NEPA), "CEQ works to balance environmental, economic, and social objectives in pursuit of NEPA's goal of productive harmony between humans and the human environment."⁵³ CEQ has recommended environmental review of facilities that directly emit 25,000 or more metric tons of carbon dioxide equivalent gasses per year.⁵⁴ The CEQ argues that a threshold of 25,000 metric tons provides a useful, presumptive limit for both discussion and disclosure of GHG emissions.⁵⁵ More specifically, this threshold "provides comprehensive coverage of emissions with a reasonable number of reporters, thereby creating an important data set useful in quantitative analyses of GHG policies, programs and regulations."⁵⁶ Again, EQB has provided no justification for selecting an EAW threshold *four times* higher than the threshold at which the federal government requires GHGs to be analyzed in federal environmental review.

III. RECOMMENDATION

As the IPCC states with "very high confidence" that most of the warming observed over the past fifty years is the result of human activity⁵⁷, the negative impacts we have already experienced as a result of climate change are just the first small increment of what is yet to come if society does not meaningfully restrain the emission of greenhouse gases.⁵⁸ The devastating effects that GHG concentrations currently have, and will come to have, upon the environment, wildlife, and public health, call for the EQB to adopt strict guidelines on GHG emissions.

In light of the Minnesota's statutory authority, the new guidance proposed by the CEQ, and MEPA's purpose of preventing or eliminating damage to the environment and biosphere, we recommend significantly lowering the proposed threshold at which GHG emissions trigger an EAW.

Given the enormous challenge of meeting Minnesota's GHG reduction goals, we are hesitant to suggest that any amount of new GHG emissions that are not offset by reductions elsewhere should escape public disclosure and discussion through MEPA review. In any event, the EQB's proposed threshold, which exempts the overwhelming majority of projects with such new emissions, does nothing to further the purposes of Minnesota's GHG reduction goals or MEPA.

The EQB should withdraw the proposed rule and instead evaluate alternatives that would further MEPA's purpose and the state's GHG reduction goals while not creating an undue burden for government agencies and project proponents. MCEA and Fresh Energy note that the benefits of GHG emission avoidance are scientifically established and indisputable. In contrast, on this

⁵³ 42 U.S.C. § 4331(a).

⁵⁴ EPA's Mandatory Reporting of Greenhouse Gases Final Rule, 74 FR 56260, October 30, 2009.

⁵⁵ *Id.*

⁵⁶ *Id.*

⁵⁷ IPCC, *Fourth Assessment Report: Climate Change* (2007),

http://www.ipcc.ch/publications_and_data/ar4/syr/en/mains2-2.html (last visited Feb. 14, 2010).

⁵⁸ *Mass. v. E.P.A.* Amicus Brief, *supra* note 41.

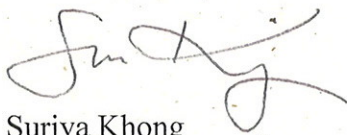
record, the supposed "burden" of completing an EAW is simply assumed. In fact, GHG emission avoidance certainly benefits projects proponents, not just long-term by reducing dangerous and costly climate change impacts but also short-term by encouraging greater efficiency and associated cost savings.

The Minnesota Legislature's threshold of 10,000 tons in direct emissions is a reasonable cut-off that would include most new large sources without overwhelming the agencies responsible for administering environmental review. In addition to this threshold for direct emissions, we recommend that the EQB consider a second threshold for projects that have both direct and indirect (Scope 2) emissions greater than 25,000 tons. It is well established that electricity consumption and energy use are huge contributors to GHG emissions. They also, however, present huge opportunities through innovative design and planning to achieve substantial savings in emissions. Therefore, including a threshold for indirect emissions associated with energy consumption should be evaluated.

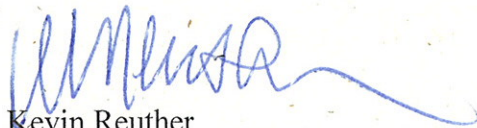
The EQB's proposed amendment restricting the EAW requirement to those few new sources emitting over 100,000 tons GHG is inconsistent with MEPA, contrary to other existing authority in state and federal law, and has not been justified in the thin SONAR provided by EQB. The EQB should withdraw the proposal and instead establish a cut-off that could meaningfully impact Minnesota's environment and public health. The EQB should live up to its charge and adopt a rule designed to effectively protect Minnesota's resources or fulfill MEPA's purpose.

Thank you for considering MCEA and Fresh Energy's comments in this matter. Please let us know if you have any questions.

Sincerely,



Suriya Khong
Law Clerk



Kevin Reuther
Legal Director

Larsen, Jon (ADM)

From: Brad Sagen [hbsagen@frontiernet.net]
Sent: Wednesday, February 23, 2011 4:45 PM
To: Larsen, Jon (ADM)
Subject: Request Hearing March 9 on greenhouse gases rule change

Mr. Larsen,

I request that a hearing be held on March 9 regarding The Minnesota Pollution Control Agency proposal a change to Minnesota Rule § 4410.4300, subp. 15 that would limit EAWs to facilities emitting 100,000 tons per year of greenhouse gases (GHGs).

I endorse the comment on the subject submitted by Paula Maccabee on February 10.

Brad Sagen

--

Bradley Sagen
13667 Deer RD
Ely, MN 55731
218 365-6461
hbsagen@frontiernet.net

Larsen, Jon (ADM)

From: ARNOSTI, Donald [darnosti@audubon.org]
Sent: Wednesday, February 23, 2011 7:23 AM
To: Larsen, Jon (ADM)
Subject: Proposed Greenhouse Gas EAW threshold

Dear Mr. Larsen,

As Policy Director for Audubon Minnesota, representing 13,000 members of the National Audubon Society in Minnesota, I request a hearing on the proposed change to Minnesota Rule 4410.4300 subpart 15. Current statute requires reporting of Greenhouse Gas Emissions of 10,000 tons per year. The proposed Environmental Assessment Worksheet (EAW) preparation threshold of 100,000 tons per year is far above that, and would virtually eliminate preparation of EAW's for Greenhouse Gas emissions.

We would request that you schedule a public hearing on this matter.

Sincerely,

Don Arnosti
Policy Director
Audubon Minnesota

2357 Ventura Drive, Suite 106
Saint Paul, MN 55125

Larsen, Jon (ADM)

From: Timothy DenHerder-Thomas [timothydht@gmail.com]
Sent: Thursday, February 10, 2011 5:35 PM
To: Larsen, Jon (ADM)
Subject: Public comment and request for hearing on proposed change to MN Rule 4410.4300 subp. 15

Dear Jon Larsen and the Environmental Quality Board,

My name is Timothy DenHerder-Thomas, and I live at 1439 Ashland Ave. Apt. 1, St. Paul, MN 55104. I'm emailing to comment on the proposed change to Minnesota Rule § 4410.4300, subp. 15 and to request for a public hearing on this matter.

I understand that the MPCA is proposing to change Minnesota Rule § 4410.4300, subp. 15 to limit the requirement of preparing an Environmental Assessment Worksheet (EAW) to facilities that emit over 100,000 tons of greenhouse gasses (GHGs) annually (instead of the current 250 tons for other air pollutants). While I understand that the 250 ton limit currently on statute may not be appropriate for GHGs, raising this limit to 100,000 tons of GHGs would greatly reduce the regulatory power of the Environmental Protection agency in carrying out the ruling of the US Supreme Court that GHGs should be considered air pollutants. As the MPCA has already identified, raising the limit to 100,000 tons would virtually eliminate the possibility that EAWs would be required for GHGs anywhere in the state.

In addition to their role in the permitting process, EAWs are essential tools for community members, local governments, and local businesses to understand the impact of proposed facilities and pursue GHG reduction strategies as to the proposed facility. The Minnesota Greenhouse Gas Emissions Control statutes Minn. Stat. §216H.11, subd. 2. has already set a reporting trigger of 10,000 tons per year of greenhouse gases. A trigger level of 10,000 tons per year should be the highest threshold that should be considered (I would encourage setting a threshold of 5,000 tons or even less) for an EAW in order to meet state climate change goals and support public participation. A much higher threshold that would exclude virtually all proposed facilities from having to undergo EAWs would conflict with the purpose and intent of State GHG reduction efforts, the EPA's regulatory authority, and the US Supreme Court's ruling.

I encourage the EQB to host a public hearing so that Minnesotans can speak out regarding their position on the proposed changes.

Thank you for your time and consideration on this matter.

Sincerely,

Timothy DenHerder-Thomas

Larsen, Jon (ADM)

From: Julia Frost Nerbonne [jnerbonne@gmail.com]
Sent: Friday, February 11, 2011 9:35 AM
To: Larsen, Jon (ADM)
Subject: Limits on EPA carbon emissions at the state level -Hearing requested

I just learned that the MN Pollution control agency is proposing to limit the application of the Environmental Protection Agency's regulation of carbon emissions to facilities that emit more than 100,000 tons annually (more than pretty much any facilities in the state).

I support state agencies having a role in limiting carbon emissions in Minnesota and request a formal hearing so that I have the opportunity to share my thoughts in more detail.

Thank you.

Julia Frost Nerbonne
2924 43rd Ave. South
Minneapolis, MN 55406

Larsen, Jon (ADM)

From: Paul Thompson [ptflydisc@aol.com]
Sent: Friday, February 11, 2011 8:48 AM
To: Larsen, Jon (ADM)
Subject: Hearing on Carbon Emissions

Jon,

Please do everything possible to hold public hearing on the proposed PCA changes...see below:

The MN Pollution control agency is proposing to limit the application of the Environmental Protection Agency's regulation of carbon emissions to facilities that emit more than 100,000 tons annually (more than pretty much any facilities in the state). This would basically gut the ability to assess carbon impact in the state under regulations that are being developed federally.

Jon, I just got back from Cancun and the UN Climate Summit as a delegate through the Will Steger Foundation. As a global community we are pretty much screwed by the unregulated belching of carbon into our atmosphere over the past 100 years. What was once a safe 275 ppm of CO2 climbed past the scientifically accepted (by 98% of all Climate Scientists) MAXIMUM level of 350 ppm (passed in 1973) to the current level of 391 ppm and according to the targets being considered in Copenhagen and Cancun (COP 15 and COP 16) we are headed to 500-to 700 ppm depending on how fast we move beyond coal and oil as our favorite sources of creating energy. My 20 year old and your kids and grandkids are basically being forced to live in a future of melting ice caps, climate change induced storms (happening now) and health concerns caused by climate disruption.

Enough negativity...just make sure that people like me have an opportunity to speak up at a public hearing on this issue and thanks for giving me something positive to say about our state when I go to Durban South Africa next year for COP 18.....we are running out of time, clean water, unpolluted soil and fresh air....as the youth in Cancun said:

"You have been negotiating all our lives....don't tell us you need more time"

thanks Jon,

Paul Thompson
Edina Energy and Environment Commission
Cool Planet- www.coolplanetmn.org
Volunteer Educator- YEA! MN (Youth Environmental Activists)

Larsen, Jon (ADM)

From: OlmCERT [olmcert@charter.net]
Sent: Thursday, February 10, 2011 9:11 AM
To: Larsen, Jon (ADM)
Subject: Proposed Rule 4410.4300 subpart 15

10 February 2011

Jon Larsen
Environmental Quality Board, Room 300
Centennial Office Bldg.
658 Cedar Street
St. Paul, MN 55155
jon.larsen@state.mn.us

Re: Proposed modification to rule 44190.4300 Subpart 15

My review of this proposed rule modification suggests that it would effectively limit public participation in responsible planning on emitters.

Unfortunately today sources of information are disappearing, with local newspapers limiting resources, city councils and county boards cutting budgets and environmental organizations not finding adequate funding, the public increasingly does not discover, let alone have the opportunity to get details of projects that will impact the air they breath and the water they drink. Prior to my retirement as the Olmsted County Attorney, and since than as an environmental advocate, I worked to assure the public the opportunity to be involved in their health and safety decisions, this proposal diminishes that.

I respectfully request the scheduling of a public hearing on this change pursuant to MS 14.25 S1.

Raymond F. Schmitz
Attorney at Law
210 14th St NE
Rochester MN 55906
507 288 3948
rschmitz22@charter.net



Paula Goodman Maccabee, Esq.

Just Change Law Offices

1961 Selby Ave., St. Paul, Minnesota 55104, pmaccabee@visi.com
Ph: 651-646-8890, Fax: 651-646-5754, Cell 651-775-7128

February 10, 2011

Jon Larsen
Environmental Quality Board, Room 300
Centennial Office Bldg.
658 Cedar Street
St. Paul, MN 55155
jon.larsen@state.mn.us

RE: Proposed Amendments to Minn. Rules, part 4410.4300, subpart 15
Environmental Assessment Worksheets for Greenhouse Gases

Dear Mr. Larsen:

The following comments are submitted based on decades of public interest advocacy work for various non-profit, small business and local government clients through Just Change Law Offices and experience serving on the St. Paul City Council for four years. They are not submitted on behalf of any specific client.

I oppose the proposed amendment to Minnesota Rule 4410.4300, subp. 15 which would limit application of an environmental assessment worksheet (EAW) to stationary sources that emit or increase emissions by the equivalent of 100,000 tons per year of carbon dioxide greenhouse gases.

It would be reasonable to leave the Rule unchanged, in recognition that carbon dioxide or equivalent greenhouse gases are "pollutants" under federal and state law. If a higher trigger than the current 250 tons per year were desired to focus public attention and resources on facilities with greater impact, I would suggest that the trigger be set at 5,000 tons per year, which is half of the level that triggers reporting requirements under Minnesota's Greenhouse Gas Emissions statute. Minn. Stat. §216H.11, subd. 2. At the very least, an EAW should be required for any project that reaches 10,000 tons per year level of GHG emissions.

State agencies must recognize that the EAW is more than a step in the Minnesota Pollution Control Agency (MPCA) permitting process. An EAW is also a tool for neighbors, local government officials, non-profit groups and, potentially, businesses selling products that would reduce emissions, to learn about the nature of potential effects of a project.

Even if there are no applicable MPCA regulations prohibiting a facility from emitting the proposed level of GHGs, it could well be important for a neighbor, local city council or non-profit group to learn that the facility in their midst has a large carbon footprint. For example, apart from MPCA permits, a local city council might propose to the project owner or developer that specific steps be taken to reduce energy consumption. Neighbors might meet with the project developer to negotiate a "Good Neighbor" agreement that would include reduced GHG emissions.

These and other steps to meet the State's goals of emissions reduction (see Minn. Stat. §216H.02) cannot take place without information. Absent an EAW, neither neighbors, local

government officials, local businesses nor environmental groups are likely to know whether a new project or modification will emit 500 tons of carbon dioxide equivalent GHGs or 50,000 tons per year.

If Minnesota Rule 4410.4300, subpart 15 were not amended, based on recent federal action clarifying that GHGs are air pollutants, any stationary source facility or modification that generates or increases GHGs by 250 tons or more per year would require an EAW. Arguably, this Rule would become over-inclusive, rather than focused on the facilities of most concern.

However, the proposed amendment setting a trigger of 100,000 tons per year would effectively eliminate GHGs as a factor requiring an EAW. This is acknowledged in the statement of need and reasonableness (SONAR) for the Rule, as follows:

Only a few types of projects are likely to have such high GHG emissions; EPA lists power plants, petroleum refineries, and cement manufacturing plants as the likely examples. In Minnesota, MPCA reports that its inventory of existing emission sources contains about 100 sources that now exceed 100,000 tons per year of carbon dioxide. Because these existing sources have been built over decades, it is apparent that in any given year there are not likely to be more than a handful of new or expanded sources that would exceed the proposed 100,000 ton threshold for an EAW. Not only would few such projects occur, but many of them that do would already require EAWs due to other existing EA mandatory categories in part 4410.4300. (SONAR, p. 3).

It is contrary to state greenhouse gas reduction goals as well as contrary to the interests of neighbors, local governments, community groups and businesses that sell products that reduce GHG emissions to deny availability of an EAW as a source of public and community information on the carbon footprint of stationary sources.

I would request a hearing pursuant to Minn. Stat. § 14.25, subd. 1 to ensure that Minnesota Rule 4410.4300, subp. 15 complies with Minnesota policies to support public participation and reduce climate change.

Respectfully submitted,



Paula Goodman Maccabee

Larsen, Jon (ADM)

From: Rosier, Michelle [michelle.rosier@apps.sierraclub.org] on behalf of Michelle Rosier [michelle.rosier@sierraclub.org]
Sent: Friday, February 18, 2011 12:58 PM
To: Larsen, Jon (ADM)
Subject: Comments on Mandatory EAW GHG Threshold

Mr. Larsen:

I just wanted to give you a head's up that 96 of our members and supporters have submitted letters requesting a public hearing around the proposed threshold for greenhouse gas emissions that trigger a mandatory environmental assessment worksheet. We are sending you a hard copy of their individual letters (with their addresses.) If you'd like a pdf of the letters I can share that as well. We would like to follow up with these folks and let them know the details of the hearing so they can participate, so please let me know when you confirm the hearing.

Thanks and have a good weekend.

Michelle

Michelle Rosier
Senior Regional Organizing Manager
Sierra Club Central Region
2327 E Franklin Avenue
Minneapolis, MN 55406

Phone: 612-659-9124 x304
Cell: 651-214-9915

Follow the North Star Chapter on [Facebook](#) and [Twitter](#).

Explore, enjoy and protect the planet.

Mr. Joshua Houdek
2820 37th Ave S
Minneapolis, MN 55406-1718
(612) 659-9124

Feb 16, 2011

Jon Larsen
Environmental Quality Board
658 Cedar Street, Room 300
Saint Paul, MN 55155

Subject: Re: Establishing a Mandatory EAW Category Threshold for Greenhouse Gases (MN Rules, part 4410.4300, subpart 15)

Dear Jon Larsen:

I write to request a public hearing on establishing a mandatory EAW category threshold for greenhouse gases.

Our state aims to reduce overall greenhouse gas (GHG) emissions that contribute to climate change below 2005 levels to avoid dangerous climate change. To do this, we need new sources of emissions to complete an environmental assessment worksheet (EAW) to ensure they are reasonably mitigating their carbon footprint. The EAW is a six-page questionnaire about a project's environmental setting, the potential for environmental harm and plans to reduce the harm. This worksheet is important to help project proponents think through how they can minimize their impact on the environment and provide an opportunity for citizens to know the impacts projects will have in their communities.

Setting the threshold at 100,000 metric tons of carbon dioxide equivalent is too high and inconsistent with state policies to reduce overall greenhouse gas emissions from 2005 levels (MN Rule 4410.4300, Sub 15.B).

In 2007, the Minnesota Legislature set goals to reduce greenhouse gas emissions: 15% below 2005 levels by 2015, 30% below 2005 levels by 2025, and 80% below 2005 levels by 2050. Overwhelming scientific consensus and adopted state policy both clearly identify the need to achieve steep reductions in greenhouse gas emissions in order to avoid dangerous changes to our climate that will adversely impact Minnesota's resources and welfare. It would be reasonable to leave the rule unchanged, in recognition that carbon dioxide or equivalent greenhouse gases are "pollutants" under federal and state law. If a higher trigger than the current 250 tons per year were desired to focus public attention and resources on the real task of reducing greenhouse gas emissions by the goals set in 2007, I would suggest taking a cue from the Minnesota Pollution Control Agency's GHG reporting requirements that require sources of 10,000 metric tons of CO₂ equivalent to report as a workable solution.

The analysis of the proposed amendment to environmental review spoke only to the benefit this change would have on project proponents. As a taxpayer, I sincerely hope the Environmental Quality Board recognizes the cost to all citizens when minimum environmental review is not done to address global warming and other damaging impacts to our environment.

Sincerely,
Mr. Joshua Houdek

Ms. Jennifer Schally
1104 Creekside Cir
Stillwater, MN 55082-9651
(651) 439-6756

Feb 16, 2011

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Environmental Quality Board
658 Cedar Street, Room 300
Saint Paul, MN 55155

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Sincerely,
Ms. Jennifer Schally

Mrs. Mary Mold
2732 Mayfair Ct
White Bear Lake, MN 55110-4945
(651) 429-6729

Feb 16, 2011

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Environmental Quality Board
658 Cedar Street, Room 300
Saint Paul, MN 55155

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Sincerely,
Mrs. Mary Mold

Mr. Eric Sandeen
1722 Scheffer Ave
Saint Paul, MN 55116-1454
(651) 698-3735

Feb 16, 2011

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Environmental Quality Board
658 Cedar Street, Room 300
Saint Paul, MN 55155

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Sincerely,
Mr. Eric Sandeen

Ms. Michelle Schroeder
601 Ridgewood Ave Apt 103
Minneapolis, MN 55403-3544
(612) 388-5623

Feb 16, 2011

Jon Larsen
Environmental Quality Board
658 Cedar Street, Room 300
Saint Paul, MN 55155

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Sincerely,
Ms. Michelle Schroeder

Ms. Ellen Mork
1013 Borgert Ave
Saint Cloud, MN 56303-2523
(320) 252-1034

Feb 16, 2011

Jon Larsen
Environmental Quality Board
658 Cedar Street, Room 300
Saint Paul, MN 55155

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Sincerely,
Ms. Ellen Mork

Ms. Lyn Yount
8432 Stevens Ave S
Bloomington, MN 55420-2365
(952) 967-0198

Feb 16, 2011

Jon Larsen
Environmental Quality Board
658 Cedar Street, Room 300
Saint Paul, MN 55155

Subject: Re: Establishing a Mandatory EAW Category Threshold for Greenhouse Gases (MN Rules, part 4410.4300, subpart 15)

Dear Jon Larsen:

I write to request a public hearing on establishing a mandatory EAW category threshold for greenhouse gases.

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Sincerely,
Ms. Lyn Yount

Mr. Donald Bry
1101 W 28th St Apt 311
Minneapolis, MN 55408-2007
(612) 871-6081

Feb 16, 2011

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Environmental Quality Board
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Ms. Kathryn Goerd
201 Delaware St. SE
Comstock E240
Minneapolis, MN 55455
(319) 541-5523

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Ms. Kathryn Goerd

Mrs. Penny Cragun
927 N 8th Ave E
Duluth, MN 55805-1425
(218) 727-2972

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Sincerely,
Mrs. Penny Cragun

Mrs. Dottie Dolezal
3005 W 43rd St
Minneapolis, MN 55410-1518
(612) 927-9447

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Mrs. Dottie Dolezal

Ms. Lisa Pollei
9578 Thunderbluff Rd NW
Oronoco, MN 55960-2033

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Ms. Lisa Pollei

Miss Kateri Heymans
1720 Carl St
Lauderdale, MN 55113-5214

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Mr. Christopher Childs
384 Hall Ave
Saint Paul, MN 55107-1132
(651) 312-1216

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Mr. Matt Johansen
10355 Greenfield Rd
Loretto, MN 55357-9616
(952) 249-4786

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Mr. Matt Johansen

Mr. Patrick O'Boyle
1849 Narvik Ct
Eagan, MN 55122-2685
(651) 270-1503

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Mrs. Marilyn Pentel
5855 Maple Frst
Mound, MN 55364-9659
(952) 380-0606

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Ms. Melissa Starr
2605 W 2nd St
Duluth, MN 55806-1852
(218) 724-3604

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Ms. Melissa Starr

Mr. Merrimon & Carol Hipps
15512 Almond Ln
Eden Prairie, MN 55347-2554
(952) 949-3589

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Mr. Merrimon & Carol Hipps

Mr. William Goshert
1528 Pascal St N
Saint Paul, MN 55108-2329
(651) 644-4276

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Mr. William Goshert

Ms. Lynda Borjesson
2530 Upton Ave S
Minneapolis, MN 55405-2346

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Sincerely,
Ms. Lynda Borjesson

Ms. Clair Sweeney
934 Evar St N
Maplewood, MN 55119-3803

Feb 16, 2011

Jon Larsen
Environmental Quality Board
658 Cedar Street, Room 300
Saint Paul, MN 55155

Subject: Re: Establishing a Mandatory EAW Category Threshold for Greenhouse Gases (MN Rules, part 4410.4300, subpart 15)

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Ms. Carol Pietrick
19205 Lake Ave
Wayzata, MN 55391-3041
(952) 475-0451

Feb 16, 2011

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Environmental Quality Board
658 Cedar Street, Room 300
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Ms. Carol Pietrick

Mrs. Ivona Risacher
6620 Tam Acres Rd
Wright, MN 55798-8266
(218) 357-3181

Feb 16, 2011

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658 Cedar Street, Room 300
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Ms. Terri Tharp
108 Birnamwood Dr
PO Box 2092
Burnsville, MN 55337-0040

Feb 16, 2011

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658 Cedar Street, Room 300
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Mr. Michael Foreman
12765 Falcon Dr
Apple Valley, MN 55124-5078

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Mr. Michael Foreman

Mr. John Grimsley
10494 Yorktown Ln N
Maple Grove, MN 55369-2857
(763) 424-6782

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Ms. Carmine Profant
5500 46th Ave S
Minneapolis, MN 55417-2338
(612) 726-9563

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800 Wildflower Ln
Sauk Rapids, MN 56379-2469
(320) 240-1834

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Mr. John Hewitt
14100 Meadow Ave NE
Prior Lake, MN 55372-1338
(952) 445-8815

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Ms. Aleen Starkweather
20 N Eliot Ave
Rush City, MN 55069-9099
(240) 715-2289

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Ms. Aleen Starkweather

Mr. Brett Smith
5300 Irving Ave S
Minneapolis, MN 55419-1130
(612) 920-9569

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Ms. La Vonne Woodruff
2884 138th St W
Rosemount, MN 55068-3465
(651) 295-0935

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Dr. Stephen Smith
4741 Humboldt Ave S
Minneapolis, MN 55419-5218
(612) 823-6068

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Mrs. Steph Leonard
753 Idaho Ave W
Saint Paul, MN 55117-3466
(612) 695-3451

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Sincerely,
Mrs. Steph Leonard

Mr. David Hohle
127 10th Ave S
South St Paul, MN 55075-2215
(651) 450-0115

Feb 16, 2011

Jon Larsen, Environmental Quality Board
658 Cedar Street, Room 300
Saint Paul, MN 55155

Subject: Re: Establishing a Mandatory EAW Category Threshold for Greenhouse Gases (MN Rules, part 4410.4300, subpart 15)

Dear Jon Larsen:

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Mr. David Hohle

Ms. Michelle Rosier
1726 Grand Ave Apt 1
Saint Paul, MN 55105-1813
(612) 659-9124

Feb 16, 2011

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658 Cedar Street, Room 300
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Sincerely,
Ms. Michelle Rosier

Dr. Nancy Shih-Knodel
15795 Tarleton Crst N
Maple Grove, MN 55311-1505
(763) 420-7563

Feb 16, 2011

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Dr. Nancy Shih-Knodel

Ms. Tara Cross
1729 Crossings Blvd
Shakopee, MN 55379-8519

Feb 16, 2011

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Sincerely,
Ms. Tara Cross

Dr. Clifton Ware
2407 39th Ave NE Unit 31
Minneapolis, MN 55421-4220
(612) 253-7707

Feb 16, 2011

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Ms. Gael Zembal
1800 Larpenteur Ave W
Saint Paul, MN 55113-5735

Feb 16, 2011

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Ms. Tracey Vetter
2167 Falcon Ave
Saint Paul, MN 55119-5003
(651) 738-3084

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Ms. Rebecca Corruccini
3229 Emerson Ave S
Minneapolis, MN 55408-3523
(612) 874-0387

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Ms. Sara & Steven Olson
PO Box 281
Prior Lake, MN 55372-0281
(651) 528-6000

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Mr. lyle larue
1353 Maynard Dr E Apt 522
Saint Paul, MN 55116-2991
(651) 490-7695

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Mr. lyle larue

Mrs. Suzanne Rohlfing
2310 15th Ave NW
Rochester, MN 55901-1549
(507) 288-2808

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Ms. Kathleen Moraski
7611 Teal Bay
Woodbury, MN 55125-1557
(651) 714-3486

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Ms. Kathleen Moraski

Ms. Kim Kokett
2243 Buchanan St NE
Minneapolis, MN 55418-3815

Feb 16, 2011

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Mr. Lawrence Krantz
9180 Goodnuff Ln NE
Bemidji, MN 56601-9780
(218) 759-1344

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Sincerely,
Mr. Lawrence Krantz

Ms. Amy Okaya
1690 County Road H2
White Bear Lake, MN 55110-6427
(651) 429-3554

Feb 16, 2011

Jon Larsen, Environmental Quality Board
658 Cedar Street, Room 300
Saint Paul, MN 55155

Subject: Re: Establishing a Mandatory EAW Category Threshold for Greenhouse Gases (MN Rules, part 4410.4300, subpart 15)

Dear Jon Larsen:

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Ms. Melissa Cathcart
3018 38th Ave S
Minneapolis, MN 55406-2141
(612) 735-9993

Feb 16, 2011

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658 Cedar Street, Room 300
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Dr. Laurel Gamm
312 S Minnesota St
New Ulm, MN 56073-2119
(507) 354-3642

Feb 16, 2011

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Ms. Heidi Hanson
1007 Saint Clair Ave
Saint Paul, MN 55105-3265

Feb 16, 2011

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Mr. Scott Zech
758 Parkside Dr
Vadnais Heights, MN 55127-3655
(952) 994-8858

Feb 16, 2011

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Mr. Scott Zech

Mr. Ronald Scott
2547 Morris Thomas Rd
Duluth, MN 55811-3265
(218) 723-1287

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Mr. Jamie Kaiser
108 Angel Ave NW
Watertown, MN 55388-8255
(218) 779-2233

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Mr. Stuart Astleford
3101 W 47th St
Minneapolis, MN 55410-1831
(612) 925-2247

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Mr. Larry Dolphin
54769 180th St
Austin, MN 55912-5969
(507) 433-9387

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Ms. Wendy Smith
5017 3rd Ave S
Minneapolis, MN 55419-1413
(612) 822-0066

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Mr. Mark Jepson
10940 Abbott Ln
Minnetonka, MN 55343-9408
(952) 933-1670

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Mr. Maarten Kuester
PO Box 6723
Rochester, MN 55903-6723

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Mr. Scott Dulas
5311 Greenwood Rd
Duluth, MN 55804-2931
(218) 624-1351

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Mr. Stephen Ruether
820 Emerald St Apt 102
Saint Paul, MN 55114-1442
(651) 303-1056

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Sincerely,
Mr. Stephen Ruether

Mr. Byron Regnier
PO Box 486
320 Bedal St
Walnut Grove, MN 56180-9374

Feb 17, 2011

Jon Larsen, Environmental Quality Board
658 Cedar Street, Room 300
Saint Paul, MN 55155

Subject: Re: Establishing a Mandatory EAW Category Threshold for Greenhouse Gases (MN Rules, part 4410.4300, subpart 15)

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Mr. Byron Regnier

Mr. Alva Crom
1343 Blair Ave
Saint Paul, MN 55104-1920
(651) 204-0728

Feb 17, 2011

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658 Cedar Street, Room 300
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Mr. Mark Owens
1104 3rd St NW
Austin, MN 55912-2905

Feb 17, 2011

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658 Cedar Street, Room 300
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Mr. Mark Owens

Mr. Jerry Fitzgerald
4181 Tall Timber Trl NW
Hackensack, MN 56452-2265
(218) 682-2941

Feb 17, 2011

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658 Cedar Street, Room 300
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Ms. Lynda Haemig
7161 Riverview Ter NE
Fridley, MN 55432-3046

Feb 17, 2011

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658 Cedar Street, Room 300
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Ms. Lynda Haemig

Ms. Ann Redig
913 1st St SW
Rochester, MN 55902-6263

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Mr. Levi Martfeld
150 2nd St NE Unit 106
Minneapolis, MN 55413-2287
(612) 332-0785

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2211 Regent Ln SW
Rochester, MN 55902-2354
(507) 289-1649

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Mrs. Dakota Hoska
5152 10th Ave S
Minneapolis, MN 55417-1724
(612) 823-2821

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Ms. Darla Knutson
617 E 11th St
Albert Lea, MN 56007-3255
(507) 377-0113

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Mr. Alexander Tsatsoulis
2919 Colfax Ave S
Apt 208
Minneapolis, MN 55408-2174

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Ms. donna barr
922 E 5th St
Duluth, MN 55805-2122

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Ms. Heidi Ahlstrand-Gallagher
6917 Pond Rd
Eveleth, MN 55734-8417

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Mr. Marc Ballbach
5503 Wingwood Ct
Minnetonka, MN 55345-5660
(952) 484-9616

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Sincerely,
Mr. Marc Ballbach

Mr. Robert Ford
1530 154th Ln NW
Andover, MN 55304-2609
(763) 413-7300

Feb 17, 2011

Jon Larsen, Environmental Quality Board
658 Cedar Street, Room 300
Saint Paul, MN 55155

Subject: Re: Establishing a Mandatory EAW Category Threshold for Greenhouse Gases (MN Rules, part 4410.4300, subpart 15)

Dear Jon Larsen:

I write to request a public hearing on establishing a mandatory EAW category threshold for greenhouse gases.

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Mr. Robert Ford

Ms. Jessica Tatro
5624 41st Ave S
Minneapolis, MN 55417-2926
(612) 963-9642

Feb 17, 2011

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658 Cedar Street, Room 300
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Mr. Jerry Kahlert
6885 Benton Way
South St Paul, MN 55076-1917
(651) 450-9310

Feb 17, 2011

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658 Cedar Street, Room 300
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Mr. Jerry Kahlert

Ms. Danielle Smith
6993 Shingobee Rd NW
Walker, MN 56484-2020

Feb 17, 2011

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658 Cedar Street, Room 300
Saint Paul, MN 55155

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Miss Stephanie Lof
33040 State 34
Akeley, MN 56433-8446

Feb 17, 2011

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Sincerely,
Miss Stephanie Lof

Ms. Rachel Syverson
7332 Russell Ave S
Richfield, MN 55423-2863
(612) 866-5778

Feb 17, 2011

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Ms. Rachel Syverson

Dr. Heidi & Murray McAllister
410 4th St N
Stillwater, MN 55082-4811
(651) 439-9227

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2335 Blomquist Ave
White Bear Lake, MN 55110-4809
(651) 426-0159

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Mr. Richard Ottman

Mr. Clarence Chaplin
1921 Lincoln Ave
Saint Paul, MN 55105-1422
(651) 695-0982

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Mr. Gene Retka
24 Fiemeyer Dr
Courtland, MN 56021-9746
(507) 354-8996

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Ms. Delores Levau
1020 Jefferson St S
Wadena, MN 56482-1852
(218) 632-5986

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Ms. Siri Bigalke
11395 Irish Ave N
Stillwater, MN 55082-9400
(651) 926-9421

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Ms. Margaret Keller
102 E 19th St Apt 304
Minneapolis, MN 55403-3765
(612) 874-7823

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Ms. Margaret Keller

Mr. Brent Pearson
608 Le Hillier St
Mankato, MN 56001-1842
(507) 344-1375

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Sincerely,
Mr. Brent Pearson

Mr. Peter Veilleux
1925 Berkshire Dr
Saint Paul, MN 55122-3608
(651) 405-0640

Feb 17, 2011

Jon Larsen, Environmental Quality Board
658 Cedar Street, Room 300
Saint Paul, MN 55155

Subject: Re: Establishing a Mandatory EAW Category Threshold for Greenhouse Gases (MN Rules, part 4410.4300, subpart 15)

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Ms. Margaret Goodnough
6644 Upton Ave S
Richfield, MN 55423-1907
(612) 861-7279

Feb 17, 2011

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Ms. Margaret Goodnough

Mr. Bruce Goff
782 Mill Run Path
Eagan, MN 55123-1689
(651) 686-7170

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Mr. Bruce Goff

Mr. Jerry Ingeman
1971 County Road 39 NW
Monticello, MN 55362-3065
(763) 878-1250

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Sincerely,
Mr. Jerry Ingeman

Ms. Lois Braun
1988 Brewster St Apt 109
Saint Paul, MN 55108-2003
(651) 641-1880

Feb 18, 2011

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658 Cedar Street, Room 300
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Sincerely,
Ms. Lois Braun

Larsen, Jon (ADM)

From: jessica.tatro@apps.sierraclub.org on behalf of Tatro, Jessica [jessica.tatro@sierraclub.org]
Sent: Tuesday, February 22, 2011 3:43 PM
To: Larsen, Jon (ADM)
Subject: Comments: Establishing a Mandatory EAW Category Threshold for Greenhouse Gases
Attachments: EQBPetitions2.22.11.pdf

Dear Jon Larsen,

Attached are 21 additional comments in regards to the EAW Category Threshold for Greenhouse Gases.

Please let me know if you have questions or need additional information.

Thank you,

--

Jessica Tatro
Sierra Club Beyond Coal Campaign
2327 E. Franklin Ave.
Minneapolis, MN 55406
office 612-659-9124 ext. 309
cell 612-963-9642
fax 612-659-9129
Follow the [North Star Chapter](#) on [Facebook](#) and [Twitter](#).

Ms. Anna Timmons
900 Washington Ave SE Apt 315
Minneapolis, MN 55414-3082
(651) 336-5071

Feb 18, 2011

Jon Larsen
Environmental Quality Board
658 Cedar Street, Room 300
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Sincerely,
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Mrs. Mindy Omen
1858 Pheasant Run St
Shakopee, MN 55379-4344
(952) 445-2254

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Mr. Rich Femling
1946 Tatum St
Saint Paul, MN 55113-5442
(651) 647-1860

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Mr. William Herzberg
PO Box 578
Finland, MN 55603-0578
(218) 353-7483

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Mr. Jeremy Stahl
1056 Seminary Ave
Saint Paul, MN 55104-1528
(651) 487-1137

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Mr. Karl Knutsen
PO Box 6385
Minneapolis, MN 55406-0385

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Mr. Scott Holland
18 20th Ave NW
Faribault, MN 55021-4818
(507) 210-1937

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Mr. Tim Bethke
8304 169th St W
Lakeville, MN 55044-6233
(952) 431-6323

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Ms. Mary Cullen
3655 41st St NW Apt 126
Rochester, MN 55901-6888
(507) 282-6255

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Sincerely,
Ms. Mary Cullen

Mr. Cj Lindor
3544 44th Ave S
Minneapolis, MN 55406-2904
(612) 860-9690

Feb 19, 2011

Jon Larsen
Environmental Quality Board
658 Cedar Street, Room 300
Saint Paul, MN 55155

Subject: Re: Establishing a Mandatory EAW Category Threshold for Greenhouse Gases (MN Rules, part 4410.4300, subpart 15)

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Mrs. Florence Sandok
1516 13th Ave NE
Rochester, MN 55906-4346
(507) 288-1149

Feb 20, 2011

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Environmental Quality Board
658 Cedar Street, Room 300
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Ms. Anne Viswanatha
1013 21st Ave SW
Rochester, MN 55902-3409

Feb 20, 2011

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Environmental Quality Board
658 Cedar Street, Room 300
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Ms. Anne Viswanatha

Ms. Marcia Reiter
51 S Deep Lake Rd
North Oaks, MN 55127-6312
(763) 443-8010

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Environmental Quality Board
658 Cedar Street, Room 300
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Sincerely,
Ms. Marcia Reiter

Mr. Jake Jacobi
861 19th Ave SE
Minneapolis, MN 55414-2503
(612) 378-3954

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658 Cedar Street, Room 300
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Mr. Jake Jacobi

Mr. David Jecsi
5857 Blaisdell Ave
Minneapolis, MN 55419-2402

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Mr. Joseph Kling
2700 Park Ave
Minneapolis, MN 55407-1017
(612) 636-3430

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16315 82nd Pl N
Osseo, MN 55311-1858

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Ms. Vicki Hollenbeck
5596 Dunlap Ave N
Saint Paul, MN 55126-5649
(651) 784-3994

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Ms. Erin Schmidtke
17512 Pavelka Dr
Eden Prairie, MN 55346-4208

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Mrs. JOY and BOB Johnson
230 2nd St NE
Harmony, MN 55939-8826

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Ms. Dyann Andybur
4119 McCulloch St
Duluth, MN 55804-1932
(218) 525-5930

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