

Memo

Date: March 6, 2026

To: Environmental Review Implementation Subcommittee

From: Jesse Krzenski and Sarah Lerohl, EQB Environmental Review Program staff

RE: Minnesota Environmental Review Performance Report 2025

The Environmental Quality Board (EQB) oversees the state’s environmental review program, as authorized in Minnesota Statutes, chapter 116D, and implemented by Minnesota Rules, chapter 4410. Under these laws, the EQB has responsibility for monitoring environmental review (ER) program effectiveness and the authority to make program improvements.

As part of that responsibility, EQB staff regularly collect and analyze data to provide information about the program’s implementation and annually give an account of the information through this performance report. The data presented in this report includes projects that followed the procedures of Minnesota Rules, chapter 4410; it does not include energy projects completed using procedures laid out in other statutes or rules.

Because state statutes and rules delegate the authority to apply the rules and complete review of individual projects to other state agencies and local governments (acting as Responsible Governmental Units or RGUs), there are challenges to collecting data and information. EQB staff are continuing to work improve data collection to support our collective ability to evaluate the effectiveness of the ER program and our provision of technical assistance.

Environmental Review Program data and information

The ER program has been collecting data about environmental review projects in Minnesota for many years. In 2020, EQB staff developed the first Data Management Plan (DMP), which established a standardized methodology for collecting and assessing data and information. The goal of data collection under the plan is to understand the program’s effectiveness and identify areas for improvement.

Annually, EQB staff compile and assess the data and information identified in the DMP and present the results to members of the Environmental Review Implementation Subcommittee (ERIS). In addition to the presentation to ERIS, EQB staff now maintain a data website, launched in 2024.

The data website has many functions including:

- Housing the data management plan
- Serving as a library for easy access to past performance reports
- Providing links to Environmental Review Project Database and ER Interactive Map
- Providing a performance report public dashboard, which is an interactive summarization of pieces of information presented in annual performance reports

Minnesota Environmental Review Program Overview

Table 1: 2025 Minnesota Environmental Review Program Overview

Metric	2025 Summary	Yearly comparisons/trends
Frequency of ER Program process types	<ul style="list-style-type: none"> EAW – 53 EIS – 3 AUAR – 8 	EAW totals rebounded slightly from last year’s lowest number completed in 10 years, but are still below the 10-year average of 65 EAWs/yr.
Frequency of mandatory categories by RGU and by location	<ul style="list-style-type: none"> See Appendix A and Appendix B 	Sixteen different mandatory categories, 7 discretionary EAWs, trending the same as previous years. The variety of project types is consistent with years past.
Frequency of comment letters submitted on ER projects	<ul style="list-style-type: none"> EAW average – 6 EIS totals (each) – 15; 24; 156 AUAR average – 9 	Average number of comment letters within normal range compared to previous years.
Frequency of unique public participation opportunities	<ul style="list-style-type: none"> 23% of RGUs held a public meeting for an EAW 	New metric in 2024, down slightly in 2025.
Time for completing review by ER process type (in days)	<ul style="list-style-type: none"> EAW average – 89 EIS average – 1012 AUAR average – 169 	Time to complete EAW data trending in line with previous years; AUARs were completed on average slightly faster.
Perceptions of whether the ER process provided usable information (EAW’s)	<ul style="list-style-type: none"> 92% of RGUs indicated that the environmental review process was useful in identifying potential env. effects 77% of the time RGUs indicated that the environmental review process identified mitigation measures. 	<p>2023 – 89% useful in identifying potential env. effects; 83% identified mitigation measures.</p> <p>2024- 94% useful in identifying potential env. effects; 89% identified mitigation measures.</p> <p>2025 average for usefulness in identifying potential env effects is down slightly from last year, while identification of mitigation measures is down 12% from 2024.</p>
Frequency and type of technical assistance provided by EQB staff	<ul style="list-style-type: none"> 279 inquiries recorded General ER process questions are most frequent, followed by questions about the petition process and mandatory category interpretation. 	2025 is first year of data collection, so lacking comparison data

2025 ER Data

Frequency of ER Program process types

This assessment provides information about the following ER Program process types:

- Environmental Assessment Worksheet (EAW)

- Environmental Impact Statement (EIS)
- Alternative Urban Areawide Review (AUAR)
- Petitions for environmental review (which may or may not result in a project undergoing review)

In 2025, RGUs completed a total of 77 processes related to proposed projects: either completing environmental review (EAW, EIS, or AUAR) or determining the need for environmental review in response to a petition (**Figure 1**).

Table 2: ER process comparison last three years

2023	2024	2025
53 EAWs	47 EAWs	53 EAWs
2 EISs	1 EIS	3 EISs
6 AUARs	9 AUARs	8 AUARs
14 Petitions	15 Petitions	13 Petitions

In the last 10 years (2016 through 2025), as shown in **Figure 1**, RGUs averaged 65 completed EAWs annually, with a high of 87 in 2018 and a low of 47 in 2024. The 53 EAWs completed in 2025 represent a slight rebound from the 10-year low recorded in 2024, but continue the trend of decreasing EAWs that began in 2023. Various factors are likely contributing to the lower number of EAWs, including the high number of AUARs being completed (eight) and especially the number of large AUARs (seven). This is the second year in a row with increased AUAR completion rates; it is likely that certain residential, commercial, or light industrial projects included in AUARs would have required their own EAW in the absence of an AUAR.

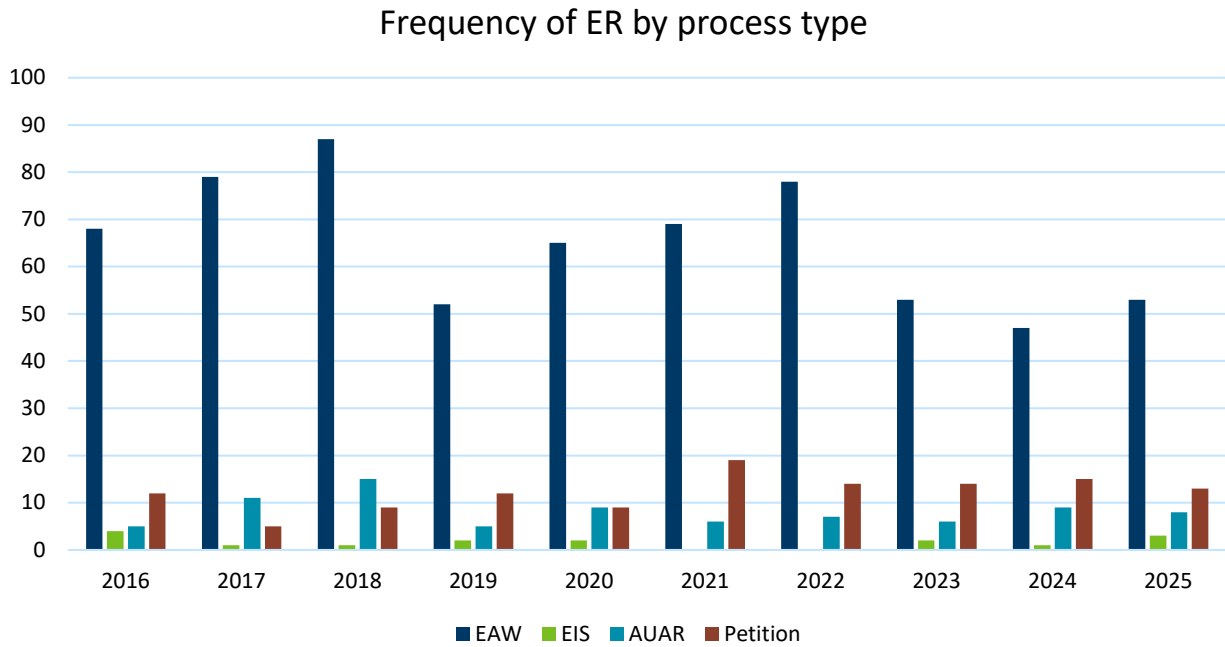
Projects are likely impacted by many factors unrelated to the ER program - such as funding and general market and economic development conditions. These outside forces are likely to contribute to the decrease in EAWs, but those factors have not been studied.

In 2025, the most frequent project types that required review included: residential development (11 projects); mixed residential and industrial-commercial (six projects); industrial, commercial, and institutional facilities (five projects); stream diversions (five projects); and wetlands and public waters (five projects). Together, these accounted for 60% of completed EAW projects. Discretionary EAWs completed in 2025 accounted for 13% of completed EAWs.

Projects outside the seven-county Twin Cities metropolitan area made up 64% of EAWs completed in 2025. Projects in the seven-county Twin Cities metropolitan area (Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington counties) made up 36% of the EAWs completed. See **Appendix A** for a further breakdown of EAWs completed by mandatory category, RGU types, and location.

Three mandatory EISs were completed in 2025 (**Appendix B**). One Supplemental EIS was completed in 2025 (**Appendix C**) for a light rail transit project conducted by the Metropolitan Council.

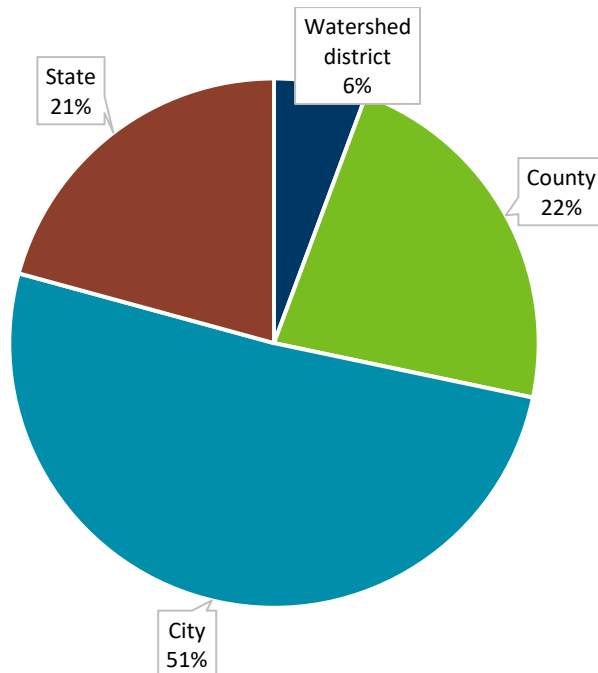
Figure 1: Environmental review trends over years by environmental review process type



Frequency of mandatory categories by RGUs and geographic location

In 2025, 43 unique RGUs completed mandatory and discretionary EAWs for 53 proposed projects. Local units of government completed 79% of EAWs, while state agencies completed 21% (**Figure 2**). Local RGUs completing reviews in 2025 included counties (23%), cities (51%), and watershed districts (6%). Nineteen EAWs (36%) were conducted on projects in the 7-county Twin Cities metropolitan area and 34 (64%) in greater Minnesota.

Figure 2: RGUs conducting EAWs



Frequency of petitions

In 2025, 13 complete petitions were submitted – they included the required components laid out in Minn. R. [4410.1100, subp. 1 and 2](#) – and EQB staff assigned them to an RGU (**Figure 3**).

Only one of the 13 complete petitions had to be submitted more than once due to missing the required components of a petition, a notable decline from 2024 when 60% of completed petitions required multiple submittals. Staff attribute this shift to three guidance changes effected in 2025:

- Petition guidance was shifted to a web-based format, making the information easier to access; all information is available in a scrollable format as opposed to the previous method of opening individual documents.
- Guidance content was updated with a particular emphasis on frequently omitted items.
- An (optional) fillable template is now provided; even when not directly utilized, the template offers a “best practice” example for comparison.

A legislative update to petition requirements took effect July 1, 2025. This update requires that a petition must be accompanied by signatures from “not less than 100 individuals who reside or own property in a Minnesota county where the proposed action will be undertaken or in one or more adjoining counties”. To be an adjoining county, the counties must be considered as connecting or sharing a border. Four petitions (31% of the annual total) were received after this change went into effect, and all were compliant with the change.

Figure 3: Number of projects petitioned for by year vs the percent proceeding to an EAW

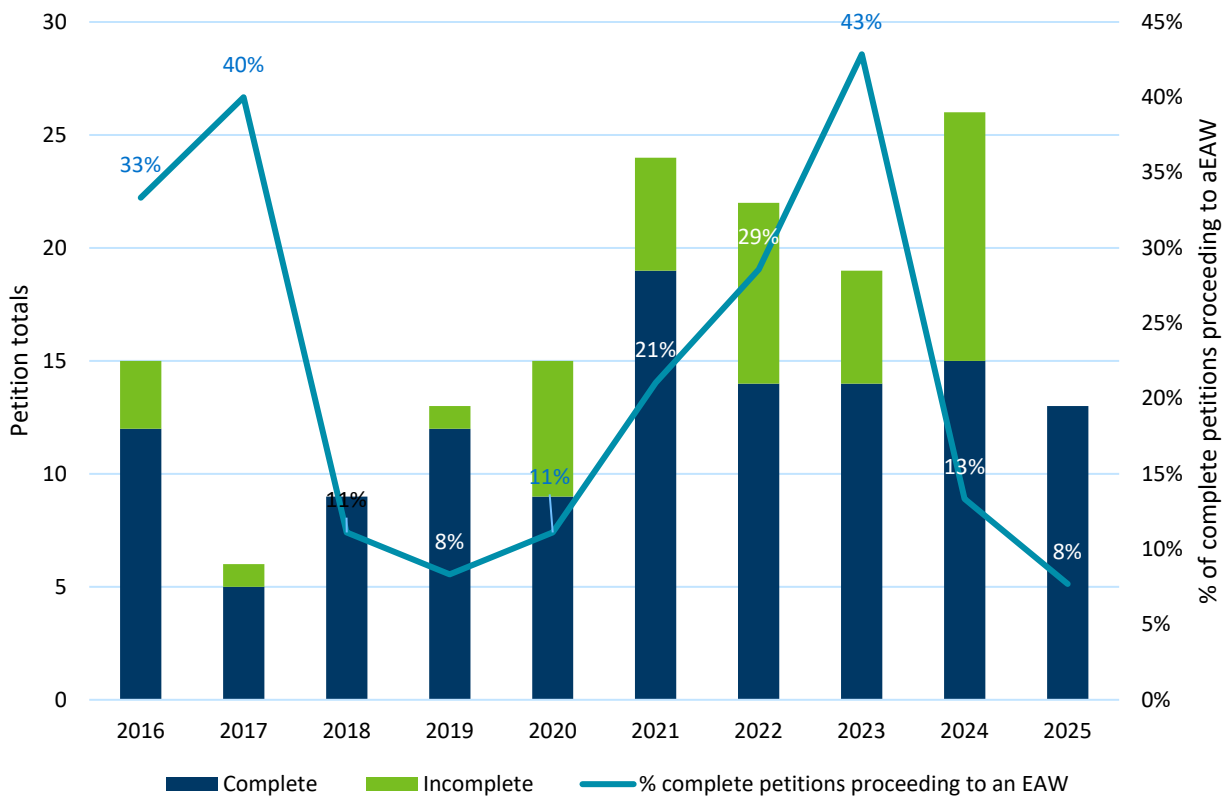


Table 3 depicts the project type of each complete petition as it would best align with a mandatory category, as well as the number of projects that proceeded through the petition process and resulted in an EAW being ordered.

A petition may conclude with approval (positive declaration on the need for an EAW), denial (negative declaration on the need for an EAW), be placed on hold (no pending government approval for the project); the project may also be deemed to be exempt from review under Minn R. 4410.4600.

In 2025, one complete petition resulted in an EAW being ordered for a project and is tied with 2019 for the lowest number of approved petitions in the previous 10 years. (See **Figure 3** for representation of percent of complete petitions resulting in an EAW being required by year.) EQB staff cannot meaningfully discern trends in decision making because of the number of variables involved; individual RGUs across the state make determinations on a case-by-case basis for each petition based on the characteristics of the project and its potential for significant environmental effects.

In 2025, 38% of complete petitions (five) were determined by the RGU to be on projects that were exempt from environmental review requirements. EQB has historically tracked petitions that were denied, approved, or placed on hold pending the project submitting permit applications. Petitions for projects that were determined to be exempt under the standard exemptions in Minn. R. 4410.4600 were not specifically identified, but that data will be collected going forward. Notably, two petitions were filed in 2025 for projects that were included in AUARs; in both cases RGUs determined them exempt under Minn R. 4410.4600, Subp. 2, item E, “projects for which environmental review has already been completed or for which environmental review is being conducted pursuant to part 4410.3600 or 4410.3700.”

Table 3: Petitions by project type and outcomes

Project type petitioned based on mandatory category reference	Number of complete petitions	Number of complete petitions resulting in an order for an EAW	Number of complete petitions exempt but on hold	Number of complete petitions RGU determined exempt
Subp. 11. Metallic mineral mining and processing.	1	0	0	1
Subp. 12. Nonmetallic mineral mining	4	0	1	1
Subp. 14. Industrial, commercial, and institutional facilities	3	0	0	2
Subp. 17. Solid Waste	1	0	0	0
Subp. 18. Wastewater systems	1	0	0	0
Subp. 19. Residential development	1	0	0	0
Subp. 20a. Resorts, campgrounds, and RV parks in shorelands	1	1	0	0
None - Soil Repatriation	1	0	0	0
TOTAL	13	1	1	4

Opportunities for public participation in the ER process

RGUs submitted 53 notices of final decisions on environmental assessment worksheets in 2025 and reported the number of comment letters received for each project. RGUs reported receiving a minimum of zero and a maximum of 37 comment letters on EAWs, with an average of six comments per project. The median number of comments received was three, with two comments being the most common number received (mode). RGUs also held a public meeting for 23% of EAWs that were completed in 2025. Public meetings are not a requirement for an EAW process.

RGUs submitted three adequacy decisions on EISs and received 15 comments, 24 comments, and 156 comment letters, respectively (see **Appendix B** for mandatory category of each project); public meetings are a required element of the EIS process and were held for each of the three projects. One SEIS was completed in 2025, receiving 27 public comments and holding a public meeting.

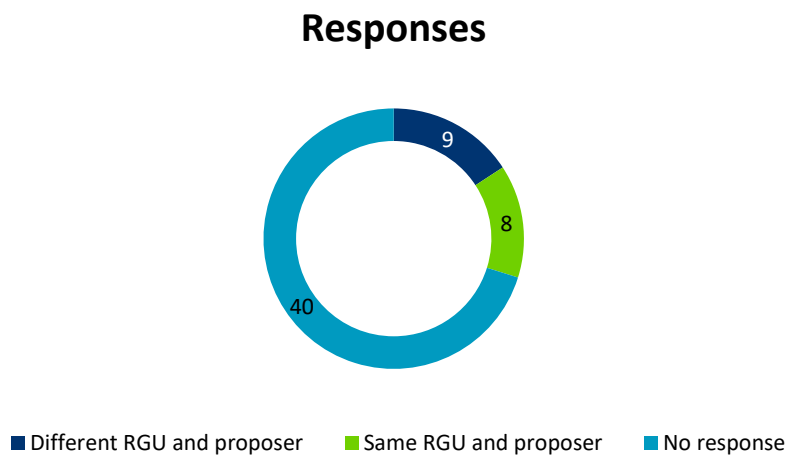
EQB Actions

EAW survey

The 2024 DMP identified new metrics to contribute to program effectiveness indicators and help EQB better understand program implementation. Staff began implementing an RGU survey in 2024 to collect additional information from RGUs as they published EAW availability notices, and 2025 represented its first full year of data collection. The survey asked RGUs questions to gain more information about the time it takes to draft an EAW as well as any engagement efforts that may take place prior to publication of an EAW.

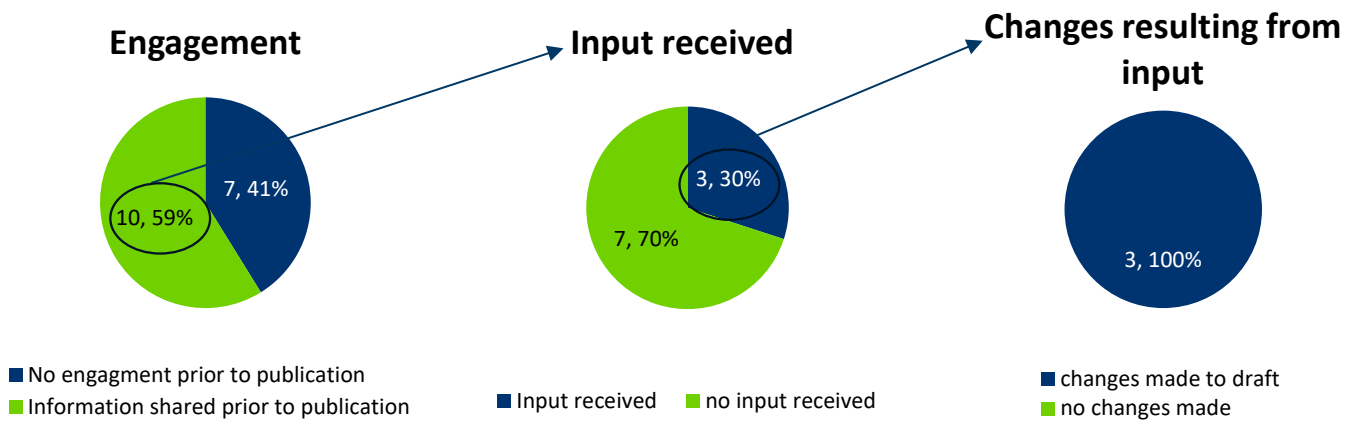
In 2025 a total of 57 RGUs were contacted to complete the survey following the publication of an EAW availability (**Figure 4**). Seventeen total responses were received resulting in a nearly 30% response rate. Of those responses, nine were from projects where the RGU and project proposer were different entities and either were responses with projects where the RGU and project proposer were the same.

Figure 4: EAW survey responses



Of the 17 total responses, 10 RGUs indicated that information regarding the draft EAW was shared with the public or other units of government prior to publication of the EAW. Three of the 10 did receive input from the sharing process and in all three cases this led to changes within the draft EAW. **Figure 5** below depicts the engagement results prior to publishing an EAW notice of availability in the EQB Monitor.

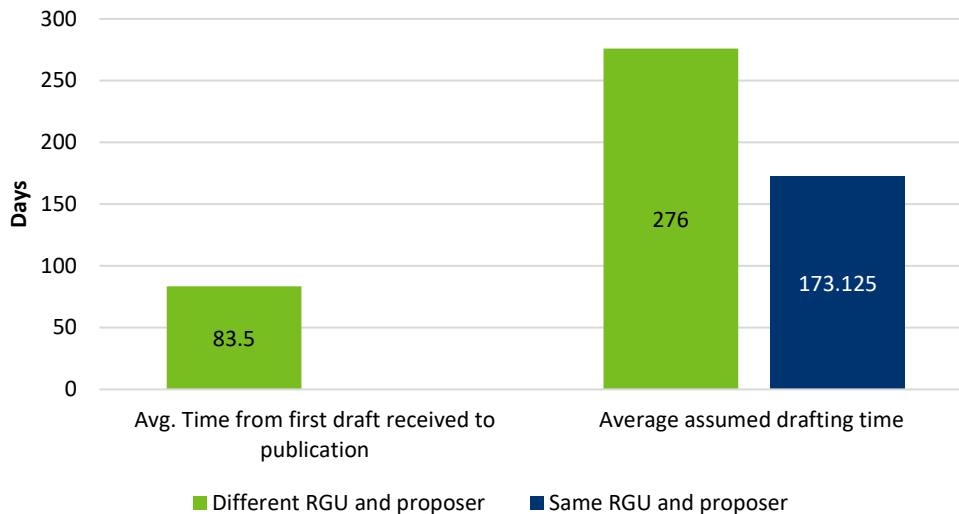
Figure 5: EAW survey - engagement results



Of the eight projects where the RGU and project proposer were the same entity, the average time noted from the beginning of drafting the EAW to the publication of the EAW availability in the EQB monitor was 173 days.

Of the nine projects for which the RGU and project proposer were not the same, two RGUs were informed of the need for an EAW by the project proposer submitting a draft EAW and seven RGUs informed the project proposer of the need for an EAW. For the seven projects where a project proposer was informed of the need for an EAW by an RGU, the average time from that notification until the EAW notice of availability was published was 276 days. Of those seven projects, two RGUs noted there were two or more incomplete submittals, two RGUs noted one incomplete submittal, and five RGUs noted zero incomplete submittals. For these nine projects, the average time it took to publish the EAW after receiving the first draft was 83.5 days. **Figure 6** below depicts this data. The figure displays the time data as “assumed drafting time,” this is due to the uncertainty of when a project proposer may or may not have begun the process of drafting an EAW after being informed by an RGU of the need.

Figure 6: EAW survey time data



While this data is informative and is useful in adding to the data EQB staff already collect on the time spent completing environmental review, this current data set is too small to support meaningful conclusions. EQB staff will work to continue to increase the response rate via direct contact with RGUs and using EQB outreach methods (EQB Monitor, newsletter) to increase awareness of the survey for future RGU submitters.

Technical assistance tracking

EQB staff implemented revised technical assistance tracking system and library of responses in fall of 2024, and 2025 represents the first full year of data collection. Staff apply a basic taxonomy to calls to understand the general nature of calls/callers and help identify trends and gaps in understanding among practitioners and the public. EQB staff logged 279 calls in 2025; this total does not include most questions about the mechanics of the online submittal service (though some unique or interesting questions are logged to assist staff training and writing standard operating procedures).

Members of the public (30%), local RGUs (27%), and consultants (27%) make up the bulk of technical assistance inquiries. **Figure 7** provides a breakdown of calls by the type of caller.

Figure 8 provides an overview of calls by topic area and **Figure 9** further explores the most common topic – ER process – with applicable subtopics. The most common questions deal with process/procedural steps (i.e. troubleshooting RGU interpretation or issues with specific rule items like timelines) and completing and submitting materials to the *EQB Monitor*.

Figure 7: Total technical assistance calls by caller type

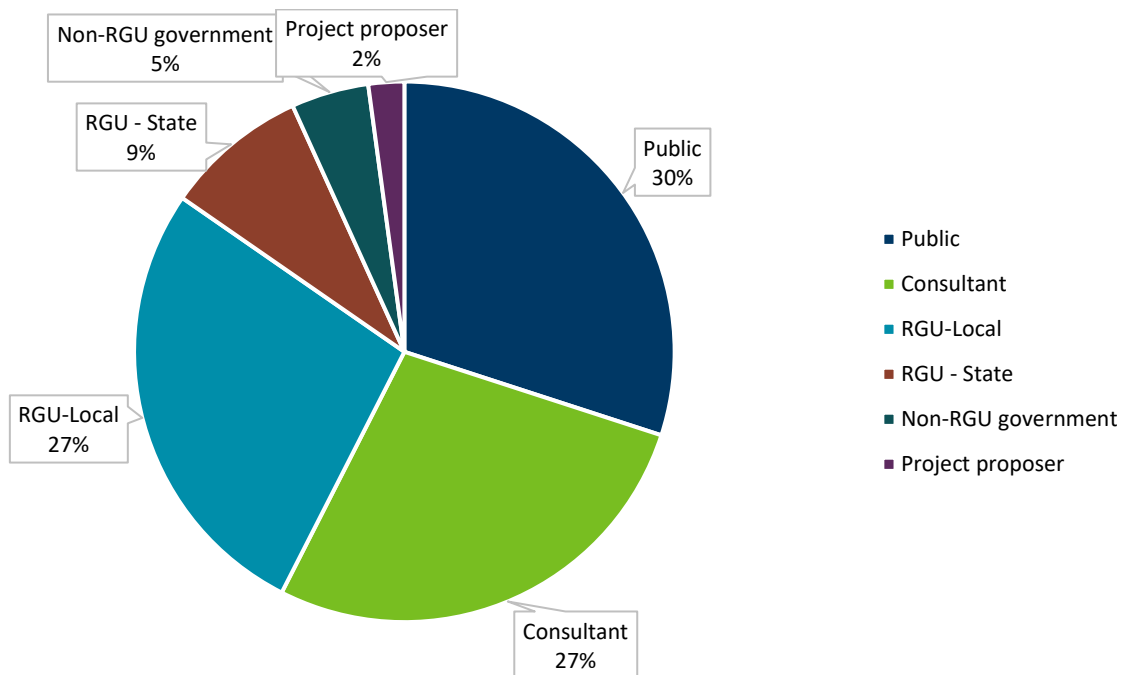


Figure 8: Total technical assistance calls by topic area

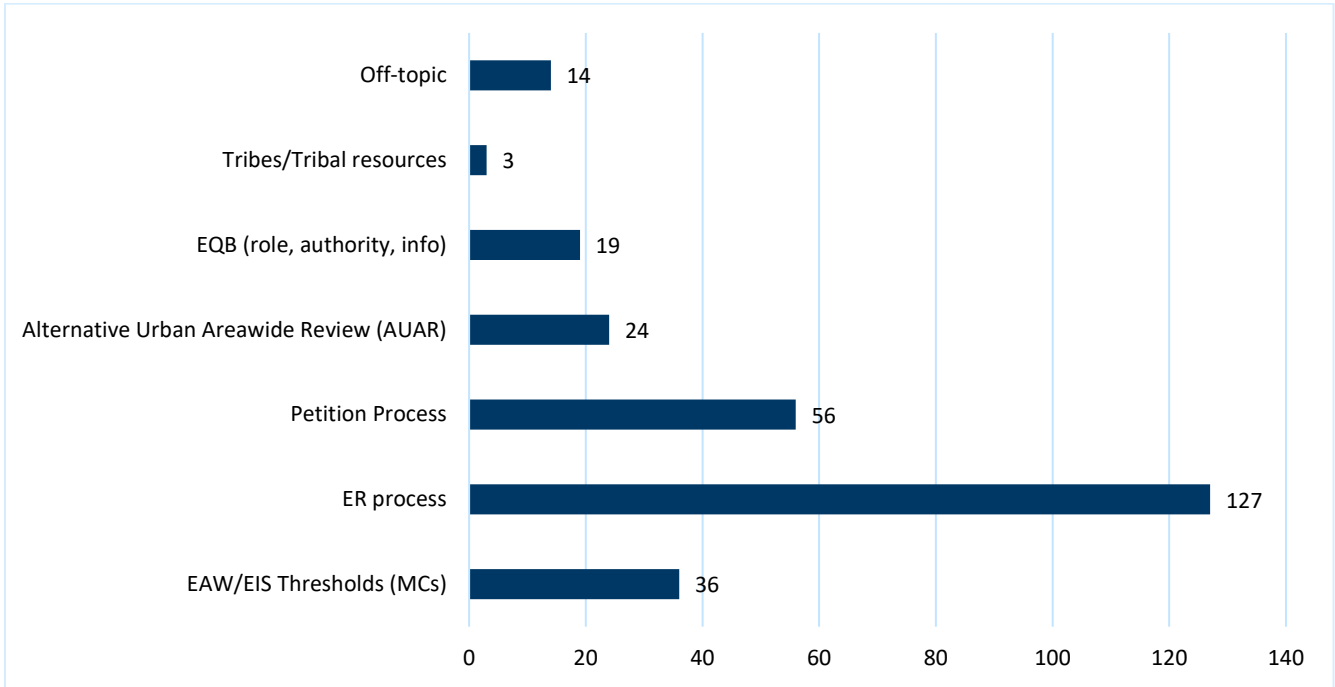
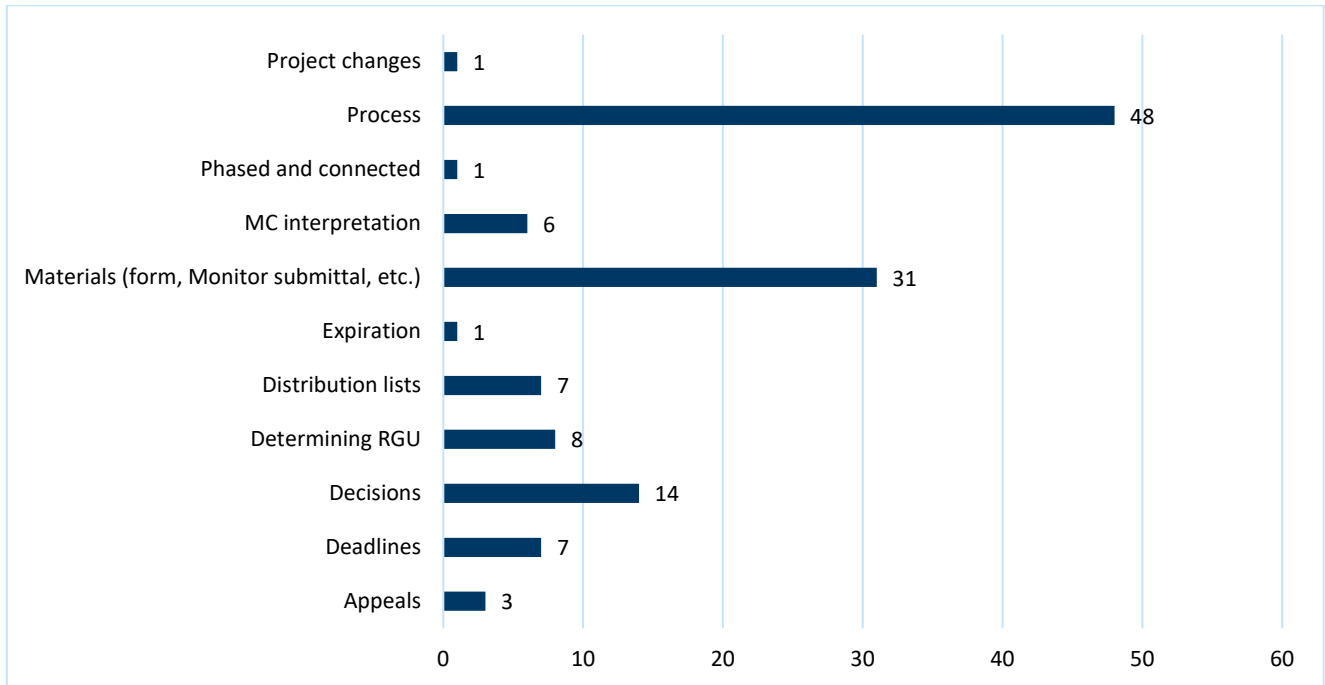


Figure 9: “ER process” questions by subtopic



Technical assistance survey

EQB staff launched a technical assistance customer service survey to gauge the use of the technical assistance program and customer satisfaction. A link to the survey was sent quarterly to RGU submitters submitting in that period, and the link was published twice/quarter in the *EQB Monitor*. Eighteen responses were received. Fourteen respondents reported that they reached out to EQB for assistance and received helpful information, two did not reach out, and two reached out but found responses were not helpful. Comments in both instances where respondents indicated EQB responses were not helpful cited frustration with ambiguity of the rules themselves; their additional comments requested training and networking opportunities to explore historic legal precedent, other RGU approaches to specific project types and/or regionally relevant environmental review challenges.

Four survey respondents requested updates to EQB guidance documents (general environmental review (1), AUAR item-by-item interpretation of EAW form (2), and climate (1)). These items are currently in process and included in the present work plan. EQB staff will work to continue to increase the response rate via direct contact with RGUs and using EQB outreach methods (EQB Monitor, newsletter) to increase awareness of the survey for future RGUs submitters.

Appendix A: 2025 Environmental Assessment Worksheet Mandatory Categories

EAW Mandatory Category reference (MR 4410.4300)	Number of Projects	State RGU # of Projects	Local RGU # of Projects	Located in Greater MN	Located in Twin Cities Metro
Subp. 5. Fuel conversion facilities Subp. 3. Electric-generating facilities	1	1	0	1	0
Subp. 12. Nonmetallic mineral mining	4	0	4	3	1
Subp. 14. Industrial, commercial, and institutional facilities	5	0	5	2	3
Subp. 17. Solid waste	1	0	1	1	0
Subp. 18. Wastewater systems	1	1	0	1	0
Subp. 19. Residential development	11	0	11	3	8
Subp. 19a. Residential development in shoreland outside of the seven-county Twin Cities metropolitan area	1	0	1	1	0
Subp. 20a. Resorts, campgrounds, and RV parks in shorelands.	1	0	1	1	0
Subp. 22. Highway projects	1	0	1	0	1
Subp. 26. Stream diversion	5	1	4	4	1
Subp. 27. Wetlands and public waters	5	3	2	4	1
Subp. 29. Animal feedlots	1	1	0	1	0
Subp. 31. Historical places	1	0	1	1	0
Subp. 32. Mixed residential and industrial-commercial projects	6	0	6	4	2
Subp. 36. Land use conversion, including golf courses	1	0	1	1	0
Subp. 37. Recreational trails	1	1	0	1	0
Mandatory EAW Sub-Total	46	8	38	29	17
4410.1000 Subp. 3. Discretionary	7	3	4	5	2
Total	53	11	42	34	19

Appendix B: 2025 Environmental Impact Statement Mandatory Categories

EIS Mandatory Category reference (MR 4410.4400)	Number of Projects	State RGU # of Projects	Local RGU # of Projects	Located in Greater MN	Located in Twin Cities Metro
EIS Subp. 9. Item A. Nonmetallic mineral mining.	1	0	1	0	1
EIS Subp. 24. Pipelines.	1	1	0	1	0
EIS Subp. 2 Item C. Nuclear fuels and nuclear waste.	1	1	0	1	0
Total	3	2	1	2	1

Appendix C: 2025 Supplemental Environmental Impact Statement Project Type

SEIS (MR 4410.3000) Project Type	Number of Projects	State RGU # of Projects	Local RGU # of Projects	Located in Greater MN	Located in Twin Cities Metro
Light rail transit extension.	1	1*	0	0	1
Total	1	1*	0	0	1

*= Metropolitan Council