

# 2019 Environmental Review Program Performance Report

## Background

Annually, EQB staff produce an ER Program Performance Report to interpret data identified in the Data Management Plan, consider the data's implications, and share its findings with the EQB and members of the public. The report is segmented into three sections, 1) accountability, 2) efficiency, and 3) transparency, which are thematically aligned with objectives of the ER Program identified in MR 4410.0300 and values expressed in the 2018 Strategic Plan. Recommendations presented in these sections will guide program improvements as well as updates to the Data Management Plan designed to further understanding of the ER Program.

## Accountability in Environmental Review

One of the primary objectives of the requirements in Minnesota's Environmental Review Program rules (MR 4410) is to encourage accountability in both public and private decision-making. Environmental review documents contain information that addresses the potential for significant environmental effects of a proposed action. Through required notices, public meetings and responses to comments, the ER process requirements encourage project proposers and responsible governmental units to be accountable for providing project information to other governmental units and citizens early in the decision making process.

The information provided in ER Program documents is meant to be used as a guide in issuing, amending, and denying permits and carrying out other responsibilities of governmental units to avoid or minimize adverse environmental effects and to restore and enhance environmental quality. However, these documents are not intended to be used to justify a decision, nor should indications of adverse environmental effects necessarily require that a project be disapproved (MR 4410.0300).

EQB staff assess the effectiveness of the ER program in meeting the intended objective for accountability by tracking and reporting three fields of data; assessed annually and with trends over time:

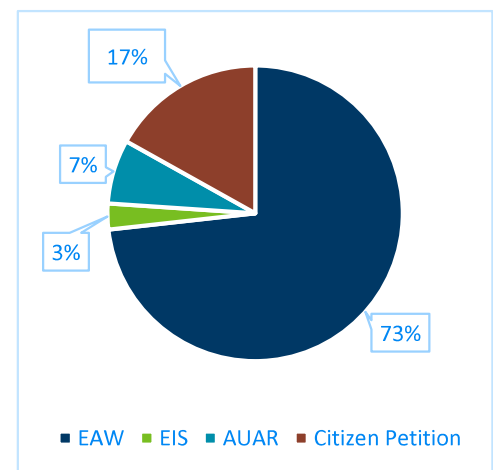
- Frequency of ER Program Process Types;
- Frequency of Processes by Mandatory Category and RGU; and
- Frequency and Completeness of Citizen Petitions.

### Frequency of ER Program Process Types

In 2015, EQB staff began tracking the types of ER Program processes implemented and the reasons the processes were required. These data are used to better understand the statewide impact of the ER Program requirements.

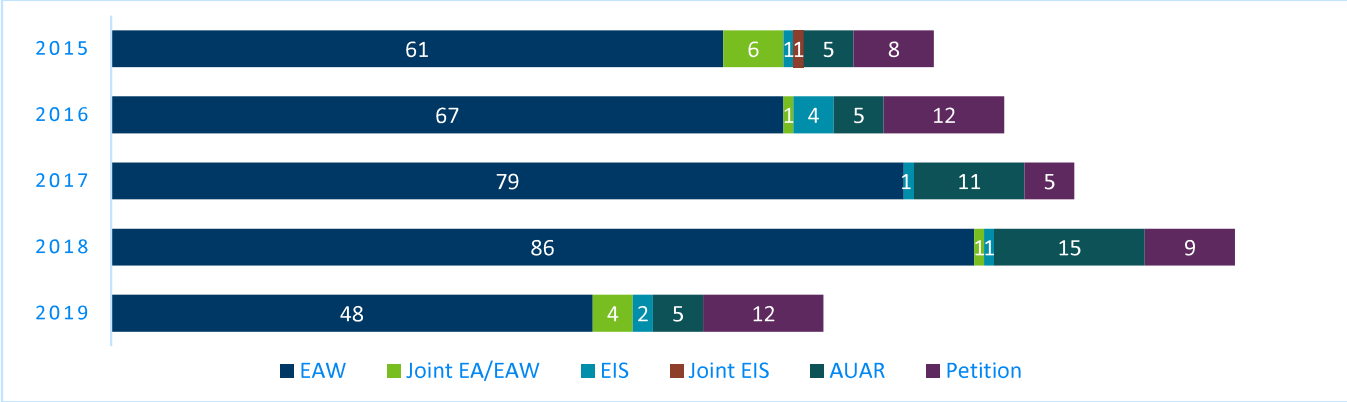
In 2019, a total of 71 final decisions of environmental review documents were completed; including 52 (73%) Environmental Assessment Worksheets (EAWs), 5 (7%) Alternative Urban Areawide Reviews (AUARs), 12 (17%) Citizen Petitions, and 2 (3%) Environmental Impact Statements (EISs) (**Figure 1**).

Consistently, over the past 5-years, the EAW has been the most frequent environmental review process type completed. EISs are regularly the least frequently completed environmental review documents (**Figure 2**). While the total number of projects that went through the environmental review process may change year by year,



**Figure 1: 2019 Environmental Review Completed by Type**

2019 data shared similar proportion of the frequency of types of environmental review with previous years. For example, EAWs, continue to comprise roughly 75% of all environmental reviews.



**Figure 2: Environmental Review Trends over Years by Types**

If the threshold for environmental review is not met under a mandatory category, environmental review can be completed at the discretion of an RGU or volunteered by a Project Proposer, so long as the project is not exempt from review under [4410.4600](#). EAWs that are required as the result of a decision on a Citizen Petition are also considered discretionary EAWs (**Table 1**). Discretionary review and citizen petitions are processes that provide any member of the public with the ability to encourage accountability in decision-making by requesting review that would not otherwise be required through Mandatory Category.

Table 1: 2019 Discretionary and Joint Federal/State Review	# of Projects
Mandatory EAW	48
Discretionary EAW - RGU	0
Discretionary EAW - Project Proposer	1
Discretionary EAW - Citizen Petition	0
Joint EA/EAW	4
Joint EIS	0
Discretionary EIS	0

Regardless of the requirement for preparation, RGUs must provide an opportunity for members of the public and other government agencies to review their ER documents and submit comments for consideration in decision-making. These RGUs are accountable for providing justification of their decision by the requirement to respond to those comments and prepare a record of decision.

*Recommendations*

1. Develop standardized collection and reporting procedures for assessing the frequency of process types by establishing an ER Data Management Plan.

Since 2015, EQB staff collected data through the Monitor submission form to track ER projects. Year-by-year EQB staff have approached more consistent data tracking on ER projects, however, currently it is a bit haphazard. While much of the data is useful, we do not anticipate need for all of the data we are collecting and have data gaps. Continued and reliable data tracking is essential for EQB to monitor and ensure effectiveness of the ER Program. Standardizing the data collection, retrieval, and reporting will allow us to continue tracking long-term trends with meaningful significance.

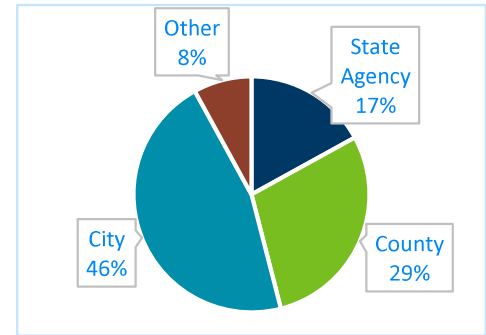
2. Expand data collection to include tracking and reporting the total annual number of ER project-related comment letters received.

Providing public comment on ER documents is one mechanism that members of the public can hold decision-makers accountable for responding to specific environmental concerns. RGUs are expected to maintain a record of comments received with specific responses to all substantive and timely comments on ER documents (EAW 4410.1700 Subp. 4; EIS 4410.2600 Subp. 4b; AUAR 4410.3610 Subp. 5c). Number of comment letters per project functions as a proxy for the accountability encouraged by the public in public and private decision-making.

## Frequency of Processes by Mandatory Category and RGU

Environmental review is required for a project type that falls into one of the mandatory categories, if they exceed the thresholds described in Minnesota Rules [4410.4300](#) and [4410.4400](#). Depending on the mandatory category, different state agencies or local governments are designated to complete the review. These rules also set thresholds for project types that identify the appropriate review process, based on the potential for significant environmental effects of that project type.

In 2019, 24 RGUs were designated for environmental review projects. Of the designated RGUs in 2019, local governments completed 83% of environmental reviews, and state agencies completed 17% (**Figure 3**).



**Figure 3: 2019 RGUs Conducting Environmental Review**

37 mandatory categories require preparation of an EAW and 28 mandatory categories require preparation of an EIS. In 2019, 20 of the 37 EAW and 2 of the 28 EIS mandatory categories triggered review (**Table 2**).

	Total # of Projects	State RGU Projects	Local RGU Projects	RGU
Subp. 3, Electric-generating facilities	1	0	1	LGU
Subp. 6, Transmission lines	1	0	1	LGU
Subp. 10, Storage facilities	1	1	0	MPCA
Subp. 12, Nonmetallic mineral mining	3	0	3	LGU
Subp. 17, Solid waste	2	2	0	MPCA
Subp. 18, Wastewater	1	1	0	MPCA
Subp. 19, Residential Development	4	1	3	LGU/ DNR
Subp. 20, Campgrounds and RV parks	3	0	3	LGU
Subp. 20a Resorts, campgrounds, and RV parks in shorelands	1	0	1	LGU
Subp. 21, Airport projects	1	0	0	MAC
Subp. 22, Highway Projects	4	1	2	LGU/DOT
Subp. 26, Stream diversion	4	1	3	LGU/DOT
Subp. 27, Wetlands and Public Waters	5	1	4	LGU/ DNR
Subp. 29, Animal feedlots	4	4	0	MPCA
Subp. 31, Historical Places	2	0	2	LGU
Subp. 32, Mixed residential and industrial-commercial projects	4	0	4	LGU
Subp. 34, Sports or entertainment facilities	1	0	1	LGU
Subp. 35, Release of genetically engineered organisms	1	0	1	LGU
Subp. 36, Land use conversion, including golf courses	1	0	1	LGU
Subp. 37, Recreational trails	4	2	2	LGU/DNR

All of the EISs completed in 2019 were required because they exceeded a mandatory category threshold (**Table 3**).

Categories	# of Projects	RGU
Subp. 6, Transmission lines	1	PUC
Subp. 24, Pipelines	1	PUC

### Recommendations

1. Conduct periodic evaluations of the mandatory category thresholds, in coordination with state and local RGUs, (in accordance with expectations of 116D.04 Subd. 5b); and
2. Track and report geographical location of required review by which mandatory categories are triggered.

An overwhelming majority of completed EAWs occur because they triggered a mandatory category (over 90% in 2019). Few EAWs result in determination of need for an EIS. This may be because project designs mitigate potentially significant environmental effects. It may also be an indication that mandatory EAW and mandatory

EIS thresholds sufficiently address projects respective of their potential for significant environmental effects. Periodic evaluations of mandatory category thresholds can inform whether thresholds set by mandatory categories sufficiently address the significant environmental effects of a proposed action. Geographical locations of review required by mandatory categories can inform EQB guidance for RGUs specific (e.g. ensuring that EQB staff provide the guidance on a particular mandatory category to the appropriate audience.)

While LGUs comprise a majority of the RGUs, most individual LGUs do not prepare multiple environmental reviews in a given year. EQB should:

3. Revise and implement targeted surveys to provide an opportunity for local RGUs to influence ER program improvement efforts and guidance.

### Frequency and Completeness of Citizen Petitions

The roles of the EQB and RGU in the petition process are defined in Minnesota statute and rule (Minn. Stat. 116D.04 and MR 4410.1100). EQB staff review the petition; determine that it complies with the signature and content requirements, designate the RGU, and forward the petition to the designated RGU. Once the RGU receives the petition, they evaluate the material evidence submitted by the petitioners and make the decision on the need for an EAW based on criteria defined in rule.

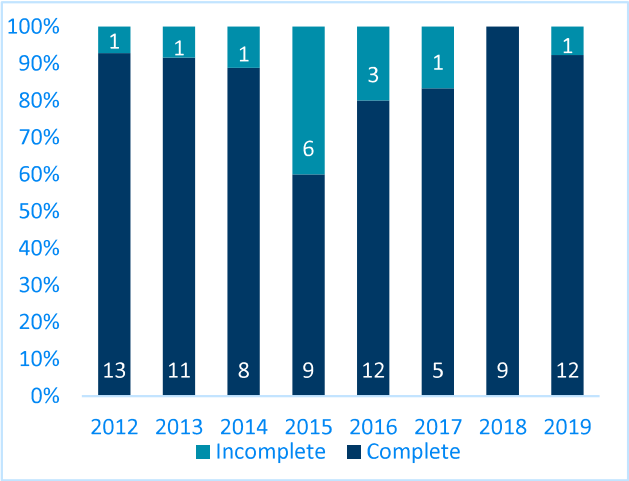
In 2019, the EQB received 13 citizen petitions. Twelve petitions were deemed complete and were assigned to an RGU. Between 2012 and 2019, an average of 86% of the petitions received were deemed complete (92% of those received in 2019 were complete petitions). The total number of complete citizen’s petitions received varied from 5 to 13 per year (**Figure 4**).

Of the complete citizen petitions received since 2012, an average of 20% result in a positive decision on the need for an EAW. Of the 2019 petitions, one had a positive EAW need decision and will be resolved in 2020. Since 2012, at least one citizen petition lead to a positive need for an EAW per year (**Figure 5**).

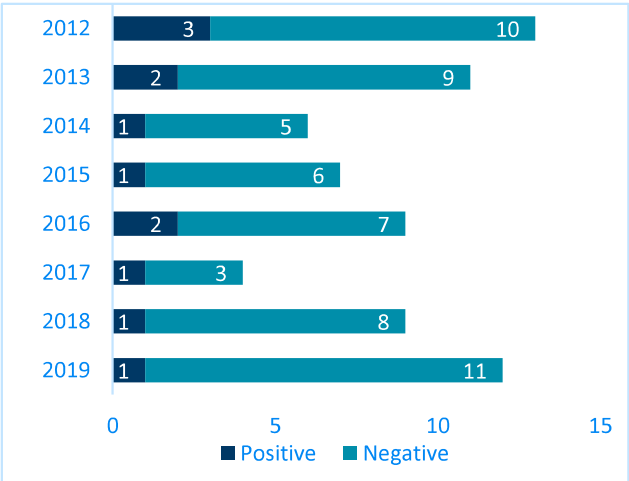
#### Recommendations

1. Continue to track frequency and completeness of citizen petitions; and
2. Survey citizens that complete and sign petitions about their experience with the petition process.

Citizen petitions provide an opportunity in the ER process for members of the public to encourage accountability of potential environmental impacts on projects that do not trigger a mandatory category. By completing a petition, a member of the public holds decision makers accountable by ensuring they provide information on potential environmental effects of a proposed project. Responses from interviews can inform EQB training and guidance.



**Figure 4: Annual citizen petition completion**



**Figure 5: EAW need decisions of citizen petitions by year**

## Efficiency in Environmental Review

Primary objectives of the Environmental Review (ER) Program rules are to reduce delay and uncertainty with how these requirements are implemented; as well as to eliminate duplication with other similar regulatory requirements that may apply to those proposed projects (MR 4410.0300).

Minnesota Rules chapter 4410 describe the types of projects that require mandatory review, the procedures for how the review will be performed and criteria used for making decisions on environmental documents. By including these requirements in rule, project proposers can anticipate when review is required and how long portions of the process will require. Rule procedures and EQB guidance and assistance aids government agencies in efficiently applying the rules to a proposed project and make it clear when public engagement is required.

Because ER Program rules delegate the authority to apply these rules to other government agencies (Responsible Governmental Units MR 4410.0400), EQB solicits information from these RGUs to monitor and report ER program efficiency. The data used to track and report ER program efficiency include the:

- Average time necessary for project review, for each process type;
- Perceived financial cost of environmental review; and
- Effectiveness of technical support and guidance, provided by EQB staff.

From 2015 to present, each time a project review decision was submitted to the EQB for publication in the *Monitor* publication, staff sent surveys to RGUs and Project Proposers. A link to a survey was also available on the EQB website, for citizens who participated in any Minnesota environmental review process type. In 2019, surveys were completed by 15 RGUs, and 7 Project Proposers, and 25 citizens.

### Environmental Review: Cost and Time

MN Rules (EAW - MR 4410.1000-.1700; EIS - MR 4410.2000-.3200; AUAR – MR 4410.3610; Citizen Petitions - MR 4410.1100) describe the timeline and steps for each environmental review process type. RGUs are required, by rule, to submit notification after they make a decision on the need for an EIS, adequacy on an EIS or AUAR, and the need for an EAW. EQB staff publish the notice of availability of initial and final ER documents in the EQB *Monitor*. Public comment periods begin when notices are published.

Table 4: Average time for ER process between initial and final publication of ER documents in the Monitor	
ER Program Process Type	# of Days
Environmental Assessment Worksheet	81
Environmental Impact Statement	676
Alternative Urban Areawide Review	55
Citizen Petition	57

Variation in date between project submissions could occur due to pace of completion and extensions of public comment period and decision-making. Tracking the average time it takes between publications in the EQB *Monitor* provides an indication of duration for each environmental review process. In 2019, the average number of days between an initial EAW decision and Decision on Need for an EIS in the *Monitor* was 81 days (**Table 4**). Time between initial and final notice of ER documents for EIS, AUAR, and Citizen Petitions are 676, 55, and 57 days, respectively.

The RGU assesses reasonable costs incurred in preparing, reviewing and distributing environmental review processes (Minn. Statute 116D.045). Project proposers pay the RGU for the fully assessed cost of the environmental review process. Thirteen of the RGUs and six project proposer respondents provided a cost estimate of completing environmental review. For RGUs and project proposers, a majority of the costs were under \$50,000 (**Table 5**).

## Recommendations

1. Develop a process to systematically track and report the period of time between when the submittal is considered complete and the ER documents are available for public comments.
2. Develop a process to systematically track and report the period of time from public comment period to the record of final decision.

Minnesota Rules (4410.0300 Subp. 4) states an objective for the environmental review program to “reduce delay and uncertainty in the environmental review process.” Time and cost it takes for environmental review projects can be difficult to consistently track for several reasons. For example, time is spent on the environmental review process prior to submission to EQB staff and self-reporting of cost may vary among submitters without standardized reporting criteria. Our current data submission form does not track environmental processes from “cradle-to-grave.” An update to our data submission form could allow us track each process in its entirety for any given project. Regardless, accurate tracking and reporting would reduce uncertainty about how much time and financial cost project proposers and RGUs will have to invest in the environmental review process.

3. Regularly track and report environmental review master consultant contract bids and length of contracts.

Environmental consultants prepare many ER Program documents. They are often hired by project proposers to assist in submitting their project data and by RGUs to assist in preparing technical assessments of project data. While not a measure of complete cost, regular tracking and reporting of the environmental review master contract bids and length of contract will provide a standardized and reliable proxy for environmental review process costs and time of projects.

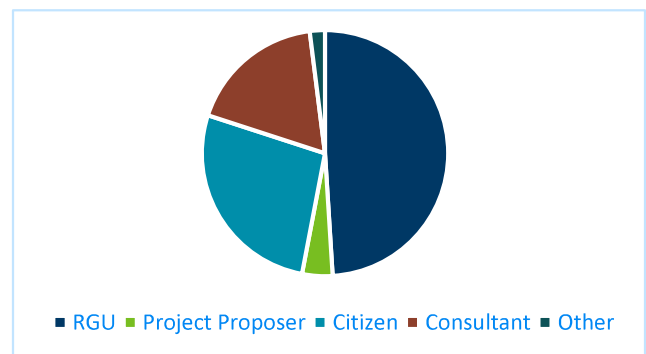
Altogether, the time it takes to complete ER Program procedures, as well as, the costs for preparing ER Program documents, will be monitored and help identify when ER Program improvements are needed. These metrics will inform EQB on the impacts of the environmental review process on RGUs and project proposers.

## Frequency, Type, and Effectiveness of Technical Assistance provided by EQB Staff

In 2019, environmental review staff logged the phone calls answered via the “environmental review help line.” In total, 175 calls were logged. Calls came from all environmental review user groups but over three quarters of questions came from RGUs and citizens (Figure 6).

On average, environmental review staff received 15 calls per month (range: 0-33). Calls were placed uniformly during all seasons of the year (Winter - 47; Spring - 46; Summer - 45; Fall - 37). Due to staff turnover and

<i>Estimate the total cost to prepare the final environmental review document:</i>		
	<b>RGUs (n = 15)</b>	<b>Project Proposers (n = 7)</b>
<i>\$0 – 10,000</i>	31%	0%
<i>\$10,001 – 25,000</i>	8%	33%
<i>\$25,001 – 50,000</i>	46%	33%
<i>\$50,001 – 75,000</i>	15%	0%
<i>\$75,001 – 100,000</i>	0%	0%
<i>\$100,001 – 150,000</i>	0%	17%
<i>\$150,001 – 200,000</i>	0%	0%
<i>Above \$200,000</i>	0%	17%



**Figure 6: Calls to Environmental Review Technical Assistance by User**

inconsistencies in data tracking, it is likely that these numbers is a conservative approximation of the number of actual calls received in 2019.

The EQB provides a range of technical support resources to RGUs, Project Proposers, and Citizens to facilitate their implementation and understanding of the Environmental Review Program. Overall, users vary on their use of EQB guidance and technical assistance (**Table 6**).

For those that provided survey response feedback, many indicated that they are satisfied with the technical support available to them through the EQB in the form of guidance documents, web content, and phone and email conversations with staff. RGUs provided additional suggestions about how to improve guidance from the EQB.

Most citizens that responded reported using EQB resources in the past (80%). The EQB website, and guidance documents on the EAW and EIS processes, were the most commonly used resources and all resources were used more than in 2018. Citizens who indicated using EQB resources also reported high rates of satisfaction with the support provided directly to them by EQB staff (**Table 7**).

### *Recommendations*

The environmental review help line and environmental review email address are the two primary methods to connect with EQB staff for ER Program technical assistance. Environmental review practitioners regularly utilize the environmental review staff helpline with approximately one call per business day. EQB staff currently track report calls by frequency and caller. EQB staff should:

1. Categorize calls received according to the subject matter of inquiry (i.e. aspects or phases of particular environmental review processes)
2. Begin to track emails in the same manner as calls currently are tracked.
3. Ask follow-up questions from those who reach out for technical assistance.

The categorization will inform EQB about frequent environmental review practitioner needs and could identify gaps in our guidance or web organization. Tracking emails alongside calls will offer a comprehensive view of technical assistance provided by EQB staff. The follow-up questions will provide direct and immediate feedback towards understanding effectiveness of technical assistance and how it can improve.

<b>Table 6: User satisfaction with EQB Technical Support Resources</b>			
<i>Did you refer to any EQB guidance or technical support during the environmental review process?</i>			
	<b>RGUs (n=15)</b>	<b>Project Proposers (n=7)</b>	<b>Citizens (n=25)</b>
Yes	39%	0%	80%
No	61%	100%	20%

<b>Table 7: Citizen satisfaction with EQB Staff Support (n=25)</b>	
<i><b>EQB staff were responsive and punctual</b></i>	
Strongly agree	67%
Somewhat agree	17%
Neutral	16%
Somewhat disagree	0%
Strongly disagree	0%
<i><b>EQB staff were courteous and professional</b></i>	
Strongly agree	83%
Somewhat agree	17%
Neutral	0%
Somewhat disagree	0%
Strongly disagree	0%
<i><b>EQB staff were knowledgeable on the topic</b></i>	
Strongly agree	50%
Somewhat agree	33%
Neutral	17%
Somewhat disagree	0%
Strongly disagree	0%

## Transparency in Environmental Review

Two primary objectives of the requirements in the Environmental Review Program include providing the public with systematic access to decision makers and providing useable information concerning the potential environmental effects of a proposed project (MR 4410.0300).

The ER Program requirements implement these objectives by:

- identifying the Responsible Governmental Units in the applicable mandatory category of project type (MR 4410.4300 and 4400);
- providing the opportunity for members of the public and other government agencies to review and comment on the environmental documents (MR 4410.1500);
- requiring responses to comments received during the comment period (MR 4410.1700); and
- publishing the notice of the record for RGU decisions on the ER documents (MR 4410.1700).

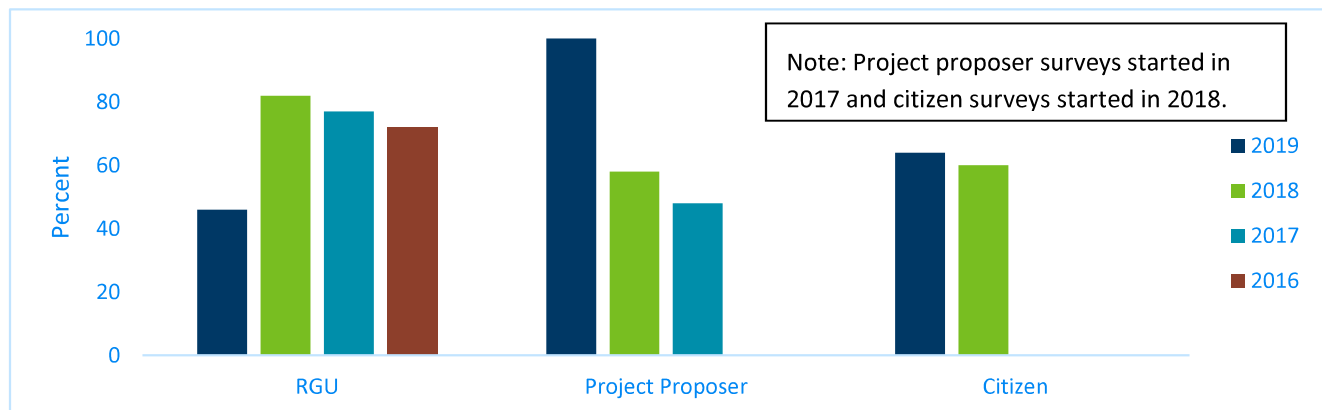
“A first step in achieving a more harmonious relationship between human activity in the environment is understanding the impact which a proposed project will have on the environment” (MR 4410.0300). ER process requirements ensure transparency in disclosing information about any potential environmental effects of a proposed project, ensure the opportunity for the public and other government agencies to provide additional information, and require publication based on RGU decisions. In addition, final ER documents include information that can be used to support meaningful participation in other government decision making.

Tracking and reporting the effectiveness of ER Program transparency is currently implemented through surveys to project proposers, RGUs and members of the public, and includes questions that identify:

- perceptions of whether the ER process provided usable information,
- opportunities for citizen participation in the ER process; and
- perceptions of citizen participants in the ER process.

## Usable Environmental Review Information

The Environmental Review Program is designed to provide usable information about potential environmental effects of a project. Of the RGUs (46%), Project Proposers (100%), and Citizens (66%) who responded to the survey, most agreed that the process provided them with usable information about potential environmental effects of the proposed project (**Figure 7**). Survey data is limited as the Citizen Survey was not distributed prior to 2018 and the Project Proposer survey was not distributed prior to 2017.



**Figure 7: Percent of users by year who feel that the Environmental Review process provides usable information regarding the proposed project's potential environmental review effects.**

RGUs and Project Proposers were asked if the document provided usable information on possible environmental effects of a project. Of those who responded, 60% of RGUs and 100% of Project Proposers agreed that the document provided usable information (**Table 8**).

#### Data Management Plan Modification Recommendation

1. The *EQB Monitor* data submission form should track, (Yes or No) “The ER process provided usable information on the environmental effects of a proposed project that would not have otherwise been identified by required governmental approvals, including permits.”

The majority of responses from RGUs and project proposers indicate that the environmental review process provided them with usable information. However, the number of survey responses vary from year-to-year, resulting in inconsistent data. Tracking this type of data through the submission form, as opposed to survey, will increase the consistency and response rates.

**Table 8: 2019 Environmental Review Process Survey Responses**

*The ER document provided useable information on the environmental effects of the project.*

	RGUs (n=15)	Project Proposers (n=7)
<i>Strongly agree</i>	20%	29%
<i>Somewhat agree</i>	40%	71%
<i>Neutral</i>	13%	0%
<i>Somewhat disagree</i>	27%	0%
<i>Strongly disagree</i>	0%	0%

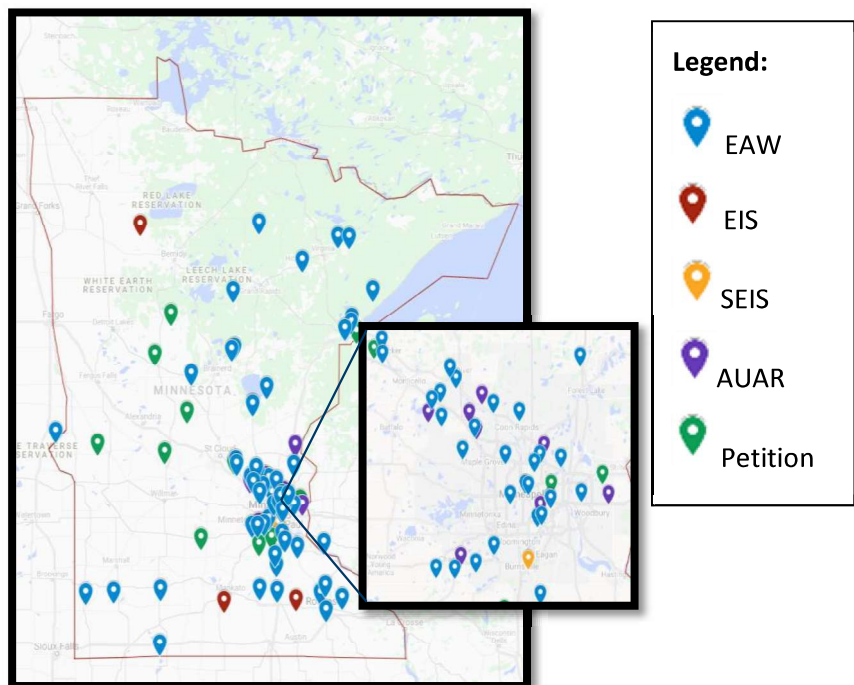
### Citizen Participation in Environmental Review

Citizen participation is an important part of the environmental review process. Citizens participate through citizen petitions, attending public meetings, providing comments during public comment periods, and appealing final decisions. The environmental review process improves public access to decision makers throughout the state (**Figure 8**). The map at right, shows all of the projects that were noticed in the EQB Monitor in 2019.

Not all ER Program process types require that an RGU holds a public meeting. However, even though not required for an EAW 31% of RGUs held at least one public meeting for EAWs completed in 2019; several

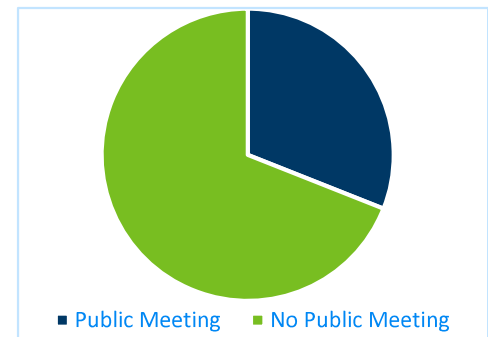
RGUs held multiple (**Figure 9**). EIS procedures require public meetings during both the EIS scoping (MR 4410.2100) and upon release of a draft EIS (MR 4410.2600).

In 2018, the EQB started a survey that was made available on the EQB website, advertised in the *EQB Monitor*, and shared via social media. The survey gathered information on citizen involvement and attitudes towards environmental review in Minnesota.



**Figure 8: 2019 Locations and Types of Environmental Review Projects**

A total of 25 citizens responded in 2019. A majority of survey respondents engaged in the ER process through an EAW. The survey results show that citizens participate in environmental review in a variety of ways, but most often participate by reviewing project documents, attending public meetings, sending comments to RGUs, and contacting RGU staff or elected officials (**Table 9**).



**Figure 9: 2019 EAW Public Meetings**

<b>Table 9: Citizen Participation in Environmental Review (n=25)</b>	
<i>(Select all that apply): As a citizen, how were you involved in the environmental review process?</i>	
<i>Reviewed document</i>	84%
<i>Attended public meeting(s)</i>	44%
<i>Wrote comment(s) to the RGU</i>	64%
<i>Contacted EQB staff</i>	16%
<i>Contacted RGU staff and/or elected official</i>	52%
<i>Contacted Project Proposer staff</i>	20%
<i>Participated in collecting information for a Petition</i>	20%
<i>Signed a Citizen Petition</i>	36%
<i>Submitted a Petition</i>	12%

Respondents shared how they found out about the environmental review process. In 2019 and 2018, citizens most often found out about the process through the *EQB Monitor* publication and advocacy organizations (**Table 10**). This suggests importance of our collaboration with partnering organizations and use of the Monitor in distributing ER documents.

<b>Table 10: Awareness of Environmental Review Process (n=25)</b>		
<i>How were you made aware about the Environmental Review process? Select all that apply.</i>		
	<b>2019</b>	<b>2018</b>
Local media (newspaper, radio, TV, etc.)	16%	25%
RGU correspondence (email listserv, newsletter, website, etc.)	28%	43%
Project Proposer (signage, website, etc.)	8%	24%
Family, co-worker, friend, neighbor, etc.	12%	24%
Advocacy organization (email, newsletter, phone call, etc.)	32%	37%
EQB Monitor	40%	29%
Other [practitioner]	12%	15%

Respondents agreed that they understood the “purpose of environmental review” (100%) and “their role and how to participate in the process” (88%). Most respondents agreed, “There were ample opportunities to participate in the process” (68%). There was mixed perception on how “the information about the proposed project was made readily available” (44%) (**Table 11**).

Table 11: Citizen Attitudes Towards Environmental Review Program Process and Outcomes (n=25)			
<b><i>I understood the purpose of Environmental Review</i></b>		<b><i>There were ample opportunities to participate in the process.</i></b>	
<i>Strongly agree</i>	76%	<i>Strongly agree</i>	28%
<i>Somewhat agree</i>	24%	<i>Somewhat agree</i>	40%
<i>Neutral</i>	0%	<i>Neutral</i>	12%
<i>Somewhat disagree</i>	0%	<i>Somewhat disagree</i>	8%
<i>Strongly disagree</i>	0%	<i>Strongly disagree</i>	12%
<b><i>I understood my role and how to participate in the Environmental Review process.</i></b>		<b><i>I felt that information about the proposed project was made readily available.</i></b>	
<i>Strongly agree</i>	52%	<i>Strongly agree</i>	24%
<i>Somewhat agree</i>	36%	<i>Somewhat agree</i>	20%
<i>Neutral</i>	0%	<i>Neutral</i>	20%
<i>Somewhat disagree</i>	12%	<i>Somewhat disagree</i>	16%
<i>Strongly disagree</i>	0%	<i>Strongly disagree</i>	20%

### *Recommendations*

1. Include a required question on the *Monitor* submission form that identifies, (Yes or No) “The ER Process led to public participation that would not have otherwise occurred for the proposed project through required governmental approvals, including permits.”

Passive surveying response rates are low and do not provide objective data. Tracking this type of data through the submission form, as opposed to survey, will increase the consistency and response rates. To ensure members of the public are regularly consulted, EQB staff should supplement this data with regular and frequent specific public surveys on a project-by-project basis.

2. EQB staff have collaborated with staff from MN.IT to develop a publicly accessible and interactive map that displays active ER projects. This map features links to public ER documents and RGU contacts, future versions will be directly connected to the EQB monitor, which provides a greater depth of information.

The map displayed on page 16 above is manually produced and not broadly shareable. The new EQB map application will facilitate access to active ER project information based on geography.

