



Minnesota Environmental Review Program

Data Management Plan

June 2024

Executive Summary

The Environmental Quality Board (EQB or Board) regularly reports key data about Minnesota’s environmental review program, providing insights into the program’s effectiveness and efficiency. Because implementation of environmental review is carried out by multiple Responsible Governmental Units (RGUs) across the state, EQB’s ability to collect and maintain data from all environmental review projects is necessary to understand and evaluate how environmental review is being implemented.

This Data Management Plan (DMP) documents the data that is regularly collected and evaluated, in order to ensure consistency in programmatic review and assessment over time. The DMP also identifies areas where additional data collection is needed or would improve our ability to evaluate program effectiveness.

Background

The EQB oversees the state’s Environmental Review (ER) Program, as authorized in [Minn. Stat. 116D](#), and outlined in [Minn. R., ch. 4410](#). Under these laws, the Board has responsibility for monitoring environmental review program effectiveness and the authority to make program improvements. Improvements may include modifying ER requirements and procedures, adjusting the Environmental Assessment Worksheet (EAW) form, developing alternative forms of review, and providing updates to ER guidance. EQB also assists governmental units and members of the public with understanding environmental review rules and fulfills administrative functions for the ER program.

State statutes and rules delegate the authority to other state and local governments (RGUs) to apply the rules of ER to individual projects.

Outcomes of ER Data Management Plan

1. **Identify key data and information** – Describes the information collected to understand and summarize program implementation metrics and evaluate program effectiveness.
2. **Provide a data and information collection standard** – Establishes procedures for the collection of reliable data and information for the assessment of the ER Program.
3. **Establish data reporting processes** – Provides a framework for annual program implementation performance reports as well as periodic assessment of program effectiveness.
4. **Describe data sharing** – Allows for accessibility to information and transparency within the ER program.
5. **Provide consistency** – Supports maintaining consistency in understanding and evaluating the program over time.

Information sources

EQB staff collect data and information regarding the ER Program from the following sources.

Actively collecting

- *EQB Monitor* submittal service: The *EQB Monitor* is a weekly publication of notices required by Minn. R., ch. 4410. An online submission service is used by RGUs (and consultants to RGUs) to provide content for the *Monitor*.¹ These submissions account for most project specific data and generates the most data to understand what is happening in ER.
- Continuous improvement process: EQB staff receive improvement ideas via engagement with the public.
- Minnesota Department of Administration master contract: EQB staff track and report data from the environmental review and technical services master contract.

Intend to collect with the implementation of this DMP

- Surveys: To gather additional data, beyond that accessible from the online submittal service, EQB staff will develop and maintain a survey program focused on gaining data to measure certain aspects of ER program performance (such as timeliness). Ideally, this survey program will eventually be integrated into the EQB Monitor submittal service. This will be new data collected by the EQB and will build baseline data; initially the survey will apply only for the EAW process.
- Technical assistance library: EQB provides information on Minnesota's Environmental Review Program to RGUs, project proposers, consultants, and members of the public via a telephone help line and email inbox. Staff track data related to the phone calls and emails received in an effort to maintain consistency in EQB's responses and identify areas where improvements to guidance may be beneficial.
- Historical ER Program data: From 2015-2023, the EQB has collected data through *Monitor* submission forms and surveys. This data will be consolidated for better record keeping and provide for better analysis of past trends. This could potentially expand beyond 2015 as well from past monitor submittals, the information available would be limited to only a portion of the descriptive data category.

Future Sources

- EIS process: Minn. R. [4410.2900](#) defines a requirement to maintain a public record detailing how each permit identified during the scoping process considered information within the EIS as a part of its decision. These records are then meant to be supplied to the EQB. The EQB has no records of these ever being submitted in the past and will need to begin to contact RGUs at the completion of an EIS in order to collect this information.
- *EQB Monitor* submittal service: The online service as noted in the sources above will need to be updated in order to ask new required questions.

¹ The submittal service was updated in 2023 to run through MPCA's online services portal and is available on EQB's website.

Environmental Review Program metrics

From the sources above, EQB staff can extract data and information about multiple metrics relevant to the program's implementation and effectiveness.

Table 1 lays out the metrics and data collected or needed within different data categorizations to be informed on the implementation of the program and then utilized to understand the effectiveness of the program.

Table 1: Data tracked by data source

Type of data	Metric	Source
Descriptive	Frequency of ER Program process types (EAW, AUAR, EIS, alternative forms) Frequency of mandatory categories and RGUs by geographic location Frequency and completeness of petitions Frequency of comment letters submitted on ER projects Number of unique comments received per project Cost of environmental review	EQB Monitor Surveys Master contract
Performance-based; results-based	Percent of projects incorporating some type of early engagement Average time of project, for each process type (from time document is deemed complete to final ER decision) Average time of project review, for each process type (focus on time spent preparing ER documents) Percent of projects identifying usable Information in ER documents Average number of mitigation measures by project type Frequency of unique public participation opportunities provided by ER Program Percent of projects indicating the usable information was utilized in a permit decision Time spent in tech assistance per categorization Percent of final decisions being challenged	EQB Monitor Surveys Technical assistance library

Performance measures

To properly understand and evaluate the functioning and effectiveness of the Environmental Review Program, EQB is interested in measuring and tracking two major groupings of performance measures.

Program Operation

Program operation measures draw primarily on the descriptive data that describes how much environmental review is done and of what project types. While this data does not necessarily describe the effectiveness of the program, it does inform the basics of what is being implemented in the program.

Program Effectiveness

EQB also must analyze how environmental review is meeting the goals and objectives laid out in the rules and statute, in order to understand program effectiveness.

In June 2023, the Board adopted a program effectiveness matrix (Figure 1), which set forth multiple criteria that define program effectiveness based on the objectives of environmental review laid out in Minn. R., ch. 4410. These criteria therefore lend themselves to be excellent performance measures to determine if environmental review is completing what it is meant to do and in turn evaluate the effectiveness of the program.

Figure 1. ER program effectiveness matrix

Criteria for information (objective A)			Criteria for engagement (objective B)			Criteria for process (objectives D and E)		
Scientific integrity	Environmental protection	Measurability	Inclusivity	User-friendliness	Accessibility	Consistency	Quality assurance	Accountability
means considering, encouraging, or making available the most up-to-date, reputable, and complete science-based information for analysis of environmental and human health impacts or mitigation	means using information in government decisions to safeguard the environment and people in Minnesota	means identifying quantifiable data for understanding project and/or environmental review impacts to human health and the environment	means inclusion of voices that have historically been marginalized, excluded, or disproportionately impacted by pollution and the ability for those voices to influence the conversation, etc.	means clear communication and procedures or understandable information to interact with environmental review; ease or efficiency to thoroughly and accurately complete environmental reviews	means access to decision-makers and processes so that the public can provide meaningful input into decision making and receive explanations and updates for why certain decisions are made	means uniformity of environmental review processes thereby promoting dependability and reliability in environmental reviews; eliminates ambiguities; promotes comparability	means EQB's ability to verify accuracy and completeness of information used in the environmental review program	means the project proposer's, RGU's and Board's ability to better demonstrate meeting the program's obligation to the public and to the environment through reporting, data sharing, transparently explaining decisions, taking responsibility for actions, and being able to explain, justify, and take consequences for them

The utilization of the criteria from the program effectiveness matrix (as based on the objectives of environmental review) as performance measures requires defining indicators and data that can be collected in order to measure and evaluate how well the implementation of the program is at achieving these measures. The performance measures and indicators will then give EQB the opportunity to better understand the impact of ER, how effective the program is at meeting its goals, diagnose potential issues with the program, and identify or support improvement ideas to the program.

Table 2: Performance measures and indicator data

Objective/performance measure	Indicators
Objective A (criteria for information)– In order to meet this objective within the rules, ER projects should be required to provide information that is science-based, measurable, and used in government decision making.	Percent of projects identifying usable Information in ER documents Average number of mitigation measures by project type Percent of projects indicating the usable information was utilized in a permit decision
Objective B (criteria for engagement)– Meeting objective B would require the program to ensure the ER process is creating inclusive and accessible access for the public to decision makers and provide proper opportunities to easily understand a project and its potential environmental impact.	Percent of projects incorporating early engagement Frequency of unique public participation opportunities provided by ER Program Percent of projects indicating a change in the project due to a comment received before or during the public comment period
Objective C (criteria for implementation authority)– The rules designate the RGU for each project type. Meeting this objective means the proper RGUs are performing the environmental review.	Comments received from the public or RGUs during the CI process or mandatory categories report indicating potential RGU changes
Objective D and objective E (Criteria for process)– Measuring the programs’ abilities to meet objectives D and E would require the program to ensure ER is not creating an undue burden on project proposers, RGUs, or the public by creating duplication with permits or unnecessary time delays. This objective also requires the program to reduce uncertainty in ER, this needs to incorporate all participants (RGUs, project proposers, public) points of view and is therefore incorporated into the measures within objective A and B as well.	Average time of project, for each process type (from time document is deemed complete to final ER decision) Average time of project review, for each process type (focus on time spent preparing ER documents) Percent of projects requiring multiple draft submittals to the RGU Percent of projects indicating the usable information was utilized in a permit decision How RGUs utilize an EIS to inform permit decisions

There are additional indicators that should be evaluated for the specific performance of ER but do not fit in one objective and typically have do not have a common standard of practice amongst projects going through ER. For instance, the rules do not mandate that a public meeting be held for an EAW process, however RGUs may choose to always hold them for certain projects. The EQB should begin to assess the effectiveness of these practices. These would include:

- Impact of engagement on public participation and time spent in ER
- Impact of numerous submittals on time spent in ER
- Impact of public participation on time spent in ER
- Impact of time spent in ER on final cost of project

Data and Evaluation Sharing

The EQB provides multiple deliverables over time that present and share the data and evaluation of the data against the program's performance measures.

Performance report

EQB staff prepare an annual performance report, which provides a summary of what has happened within the past year regarding environmental review. To date, it has focused primarily on operational measures. This report serves as a useful tool in summarizing the data collected by EQB and identified in this DMP. By committing to annual summarization of the data the EQB will be able to assess trends within the program that may require additional attention. The report will also serve as a way to assess effectiveness within the program. The focus of the report however should be to determine trends over time which will then lead to better understanding of the effectiveness of the program overall and not just at a snapshot in time. By evaluating the effectiveness the program based solely on information within one annual report the EQB could be reacting too quickly to anomalies rather than addressing the actual trends within the program.

Mandatory category report

Legislatively the EQB is tasked with assessing the mandatory categories every three years. Data collected as called out within this plan should be used to support that report's analysis and recommendations for change. Some of the future data needs, as noted in the [Future needs](#) section, regarding information about proposed projects potential environmental impacts could also be utilized within this report.

Environment and Energy report card (E&E report)

The E&E report could potentially benefit from the information presented within environmental review documents and present a better understanding of how ER impacted those projects in regard to the potential impact to the environment.

Data website including public dashboard

The EQB will begin to provide a more transparent approach to the data maintained within ER. A data specific website will be developed and include a public facing dashboard developed through Tableau. This dashboard will supplement the information found in the Environmental Review Database to greater inform the public about projects going through environmental review. The website will also make data from past performance reports available and potentially incorporate data from other historical ER records.

Continuous improvement process

As improvement ideas are filtered through the matrix and staff is prioritizing potential program improvement ideas, the data collected regarding ER will be utilized to support these improvements ideas.

Technical assistance library

EQB staff will alter the way it tracks and records data related to the phone calls and emails received in an effort to maintain consistency in EQB's responses and identify areas where improvements to guidance may be beneficial.

Future needs

- An additional area of need is for the EQB to collect data from completed ER projects to better understand how projects have the potential to impact the environment. This information could be used to better inform reports from EQB, such as the mandatory categories report as a way to evaluate the effectiveness of the categories and their thresholds.
- By collecting project specific data, the EQB could begin to incorporate data from environmental review into the Environment and Energy Report Card. For example, the EAW form asks each project to calculate expected greenhouse gas emissions, this information regarding the amount of greenhouse gas emissions expected or potentially reduced from project types or sectors could be tracked.
- The data management plan has identified the need to better understand how environmental review is interacting with projects through the decision/permitting phases. EQB will begin to assess this information via surveys, however this will still be asked before a project reaches the permitting phase for a project requiring an EAW. There will still be a need to collect this information later in a proposed projects process. A potential route for gaining this information could be achieved by mimicking other programs annual reporting requirements for program users.
- The rules of ER indicate the requirement of RGUs to document how permit decisions are informed by the EIS process and report that information to the EQB. The EQB has no record of this being completed by RGUs and will need to educate and provide guidance on how this should be accomplished in order to receive this information from the program moving forward.
- For the data that is indicated by the DMP as being collected via surveys, the EQB intends for these questions to eventually be integrated into the EQB Monitor online submittal service. This will require an enhancement to the existing service via MNIT.