



Minnesota Association of County
Planning and Zoning Administrators

July 27, 2006

Dana Badgerow
Commissioner of the Department of Administration
200 Administration Building
St. Paul, MN 55155

Commissioner Badgerow:

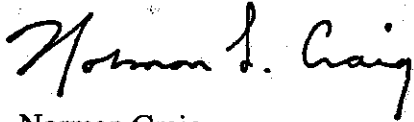
The purpose of this letter is to comment on the proposed category for shoreland development EAW threshold standards the EQB and DNR are currently working on. A representative from the Association of Minnesota Counties (AMC) as well as someone from the Minnesota Association of County Planning and Zoning Administrators (MACPZA) have been involved in the discussions regarding the proposed thresholds since the stakeholder meetings on this issue began. After viewing the outcome of the stakeholder meetings, MACPZA sent comments to the Environmental Quality Board (EQB) and to the Department of Natural Resources (DNR) referencing concerns about the complexity of the proposed development thresholds.

MACPZA as well as AMC have continued to discuss the proposed thresholds and have voiced concerns to the DNR and EQB staff. It is our understanding that the proposed shoreland development thresholds will be released for comment sometime in the upcoming month. MACPZA would like to have the opportunity to recommend some simpler solutions for this new threshold category. AMC and MACPZA do not oppose the creation of the categories; but see that the issues lay in the complexity of the proposed threshold provisions that are currently before the EQB. The county associations are concerned that as proposed, the rule could become very complicated to interpret as well as to administer. The county associations are requesting that any changes to the rule be kept simple to allow for greater ease in administration of the rule.

MACPZA asks that the EQB delay the request for comments for the shoreland development threshold category until after the August meeting of the EQB. During this time AMC and MACPZA will work together to prepare an alternative to the proposed rule.

The county planning and zoning members of MACPZA appreciate your consideration of these concerns.

Sincerely,



Norman Craig
MACPZA President

cc:

- Gregg Downing, Environmental Quality Board
- Annalee Garletz, Association of Minnesota Counties
- ✓ Jon Larsen, Environmental Quality Board
- Michael Sullivan, Environmental Quality Board