

Technical Memorandum

To: Denise Wilson, Director, Environmental Review Program – Minnesota Environmental Quality Board (EQB)
From: Barr Engineering Co. Project Team
Subject: Interview Summary
Date: May 17, 2021
Project: Environmental Review Implementation Subcommittee (ERIS) Engagement (Project)

1.0 Introduction

As directed by EQB's 2020-2021 Workplan, and in response to Executive Order 19-37 on climate change, ERIS (a subcommittee of the Environmental Quality Board [EQB]) convened an Interagency Environmental Review Climate Technical Team to advise them on changes to the State Environmental Review Program requirements.

Accordingly, the Environmental Review Climate Technical Team developed the *DRAFT Recommendations: Integrating Climate Information into MEPA Program Requirements, dated December 2020*, (DRAFT Recommendations). The DRAFT Recommendations specified an engagement framework to solicit input from various stakeholders, including the public. EQB contracted with Barr Engineering Co. (Barr) to assist with implementing the engagement process. The engagement consisted of:

- Public comment period
- Listening sessions
- Public survey
- Interviews

This memorandum summarizes the feedback received through the interviews. A total of 22 interviews were conducted. Section 2.0 of this memorandum describes the interview implementation process and outreach. Section 3.0 of this memorandum provides summaries of the interviews conducted.

2.0 Interview Implementation Process and Targeted Engagement

EQB and Barr prepared a list of 45 stakeholders that were invited to participate in the interview process. The stakeholder list was created with the intention to reach stakeholders with various types of affiliation to the EAW process. Interviews were held confidentially; therefore, this summary report does not identify specific stakeholders beyond the affiliation category.

Barr, EQB, and Environmental Review Climate Technical Team members emailed stakeholders requesting their participation in the interview process. Invitations were sent between March 30, 2021 and April 16, 2021. When responses to emails were not received by the requested response timeframe, it was assumed

the stakeholder elected not to participate in the interview process. Virtual meetings were arranged for those willing and able to participate between April 5, 2021 and May 6, 2021.

A summary of those invited to participate in the interview process and those that completed interviews are summarized by affiliation in Table 2-1.

Table 2-1 Interviewee Invitees and Participants

Affiliation	Total Count Requested to Participate in Interview	Total Count of Completed Interviews
Climate technical expert	8	4
Consultant	3	3
Environmental justice expert	6	2
Government decision maker	3	2
Local Government Unit (or "LGU")	8	0
Member of the public	5	3
Non-Governmental Organization (or "NGO")	4	4
Project proposer	4	2
Responsible Government Unit (or "RGU")	3	2
Tribal environmental expert	1	1
Total	45	23

Barr and EQB's technical team collaborated to develop the questions provided in the interviews that followed the online survey format. The interviewer completed a record form (Attachment A) during each interview. Interviews were typically a half-hour in duration with the first half of the interview allotted for interviewees to response to the interview questions reflected in Attachment A and also summarized in Table 2-2 below. The second half was an open-ended forum for the interviewees to share feedback on the EQB's recommendations.

Table 2-1 Interview Questions

Question	Response Option
1. Please provide the affiliation that best describes you in relation to the EAW process	<ul style="list-style-type: none"> • Member of the public • Environmental Justice expert • Non-Governmental Organization • Government decision-makers • Tribal environmental expert • Project proposer • Regulated Governmental Unit • Consultant • Climate change technical expert • Other (with a text field to provide response)

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Question	Response Option
2. Your zip code	Open to provide response
3. Please provide your level of agreement/disagreement with the following statement: I believe adding climate information to the Environmental Assessment Worksheet form will benefit Minnesota	<ul style="list-style-type: none"> • Strongly disagree • Disagree • Neither agree nor disagree • Agree • Strongly agree
4. If climate information were included in the Environmental Assessment Worksheet form what types of information should be added? (Select all that apply)	<ul style="list-style-type: none"> • How many tons per year of greenhouse gases (GHG) is emitted from the project • The sources of GHG emissions • The types of GHG emissions • The types of practices that will be implemented to reduce GHG emissions • The types of practices that were considered, but not implemented to reduce GHG emissions • Whether GHG emissions were reduced by purchasing credits from other GHG reduction activities • How GHG emissions from the project may affect achievement of the Minnesota Next Generation Energy Act goals and/or other more stringent state or local GHG reduction goals • How the project can adapt to changing climate conditions • Activities that will be implemented to ensure the project is resilient to changing climate conditions
5. Other climate-related information that should be included on the Environmental Assessment Worksheet	Open to provide response
6. If additional climate information were included, what additional resources would you need in order to provide that information or be able to put the information in context?	Open to provide response
7. Please provide your level of agreement/disagreement with the following statement: A new category requiring preparation of an Environmental Impact Statement related to greenhouse gas emissions is important for Minnesota.	<ul style="list-style-type: none"> • Strongly disagree • Disagree • Neither agree nor disagree • Agree • Strongly agree
8. Please provide additional comments you would like share about integrating climate information into Environmental Review Program.	Open to provide response

3.0 Summary of Interviews Conducted

3.1 Interview Question 1 Responses

Question 1 requested interviewees *confirm the affiliation that best describes you in relation to the EAW process*. Table 2-1 in the Interview Implementation Process and Targeted Engagement section summarizes the responses.

3.2 Interview Question 2 Responses

In order to maintain the confidentiality of the respondents, zip codes are not provided in this report.

3.3 Interview Question 3 Responses

All interviewees answered question 3: *Please register your level of agreement/disagreement with the following statement: I believe adding climate information to the Environmental Assessment Worksheet form will benefit Minnesota*. Table 3-3 provides the breakdown of the responses received. 79% of interviewees either strongly agree or agree that adding climate information to the EAW form will benefit Minnesota. 13% of respondents either strongly disagree or disagree that adding climate information to the EAW form will benefit Minnesota.

Table 3-3 Interview Question 3 Responses

Answer Choice	Number of Responses	% of Responses Received
Strongly disagree	2	9%
Disagree	1	4%
Neither agree nor disagree	2	9%
Agree	5	22%
Strongly agree	13	57%
Total	23	Not applicable

3.4 Interview Question 4 Responses

All interviewees answered question 4: *If climate information were included in the Environmental Assessment Worksheet form what types of information should be added? (Select all that apply)*. Table 3-4 provides the breakdown of the responses received.

Table 3-4 Question 4 Responses

Answer Choice	Number of Responses	% of Responses Received
How many tons per year of greenhouse gases (GHG) is emitted from the project	19	83%
The sources of GHG emissions	19	83%
The types of GHG emissions	16	70%
The types of practices that will be implemented to reduce GHG emissions	19	83%

Answer Choice	Number of Responses	% of Responses Received
The types of practices that were considered, but not implemented to reduce GHG emissions	14	64%
Whether GHG emissions were reduced by purchasing credits from other GHG reduction activities	16	70%
How GHG emissions from the project may affect achievement of the Minnesota Next Generation Energy Act goals and/or other more stringent state or local GHG reduction goals	16	70%
How the project can adapt to changing climate conditions	19	83%
Activities that will be implemented to ensure the project is resilient to changing climate conditions	19	83%
Total	23	Not applicable

3.5 Interview Question 5 Responses

A total of 20 out of 23 interviewees answered question 5: *Other climate-related information that should be included on the Environmental Assessment Worksheet*. Barr reviewed the responses and assigned a primary theme to assist with the evaluation of the DRAFT Recommendations (Attachment B). Table 3-5 provides the primary themes assigned and number of responses received in each theme.

Table 3-5 Question 5 Responses Summary

Response Theme	Theme Description	Number of Responses	% of Responses Received
Water quality	Include aspects of water quality as it relates to climate change	1	3%
Project-specific issues	Discussion on how changes in projects address climate change (i.e. materials, supply chains)	3	10%
Carbon offsets	Include carbon offsets and sequestration changes	1	3%
Mitigation	Comprehensive set of mitigation questions and analyses in an EAW	2	7%
RGU responsibility	RGU taking a role in impact analyses and assessments of GHG significance	3	10%
Environmental justice	Ensure EAWs completed for projects in designated EJ communities	3	10%
Adaptability	Ability for EAWs to adopt new research to its methodology without required review from rule makers	1	3%
Variation in project scope	Address the differences between projects in large urban areas compared to projects in small rural communities	1	3%
Natural resources	Project impacts on T&E species and habitats on state and NGO lands	1	3%

Response Theme	Theme Description	Number of Responses	% of Responses Received
Standardization	Provide guidance and templates on how data relates to specific projects and provide definitions regarding climate change and GHG	4	14%
Initial vs. long-term emissions	Identify the difference between initial and long-term emissions from projects	2	7%
Information access	Availability to the public regarding mitigation measures and increased collaboration between EQB and RGUs	1	3%
Emission modeling	Setting GHG emission goals during the design phase rather than during environmental review	1	3%
Environmental services impacts	How the existing landscape may be affected by a project	1	3%
Economic impacts	Provide a tool to identify costs relating to climate change and GHG for projects	2	7%
Related projects	How projects compare to similar projects worldwide from a climate change and GHG standpoint	2	7%
Total	Not applicable	29	Not applicable

3.6 Interview Question 6 Responses

A total of 18 out of 23 interviewees answered question 6: *If additional climate information were included, what additional resources would you need in order to provide that information or be able to put the information in context?* Barr reviewed the responses and assigned a primary theme to assist with the evaluation of the DRAFT Recommendations (Attachment C). Table 3-6 provides the primary themes assigned and number of responses received in each theme. Three interviewees did not provide comment on question 6, one interviewee stated that the question was not applicable as a non-applicant, and one interviewee was unsure of the intent and meaning of the question.

Table 3-6 Question 6 Response Summary

Response Theme	Theme Description	Number of Responses	% of Respondents
Mitigation factors	Increase in awareness of mitigation factors	2	11%
Increased RGU funding	Additional funding to support additional staff and support collaboration between RGUs	3	17%
Guidance from EQB	Provide a standardized approach, and documents, trainings, webinars, etc.	5	27%
Address concerns without monitoring	Additional monitoring could be cost prohibitive	1	6%

Response Theme	Theme Description	Number of Responses	% of Respondents
Unbiased research	Utilized unbiased research to address concerns	2	11%
Environmental review guides	Provide guides to ER processes, carbon markets, etc. to expediate the ER process	1	6%
Community views	Identify and address concerns regarding environmental justice, social, economic, and environmental impacts	3	17%
Standardized responses	Provide standardized responses to questions regarding EAWs	2	11%
Rules and Regulations	To determine the thresholds that would trigger the denial of a project or need for an EIS	1	6%
International standards	GHG emission goals tied to international standards	1	6%
Climate projection data	Tie to the state's climate projection data	1	6%
Land sinks	Include natural land sinks, and exempt animals and plants involved in the feedlot carbon cycle	1	6%
Total	Not applicable	18	Not applicable

3.7 Interview Question 7 Responses

All interviewees, except for one, answered question 7: *Please register your level of agreement/disagreement with the following statement: A new category requiring preparation of an Environmental Impact Statement related to greenhouse gas emissions is important for Minnesota.* Table 3-7 provides the breakdown of the responses received. 73% of interviewees either strongly agree or agree that a new category requiring preparation of an EIS related to greenhouse gas emissions is important for Minnesota. 14% of interviewees either strongly disagree or disagree that a new category requiring preparation of an EIS related to greenhouse gas emissions is important for Minnesota.

Table 3-7 Question 7 Responses

Answer Choice	Number of Responses	% of Respondents
Strongly disagree	2	9%
Disagree	1	5%
Neither agree nor disagree	3	14%
Agree	3	14%
Strongly agree	13	59%
Total	22	Not applicable

3.8 Interview Question 8 Responses

A total of 20 out of 23 interviewees answered question 8: *Please use the space below for additional comments you would like share about integrating climate information into Environmental Review Program?* Of the 20 respondents, there were 46 responses. Barr reviewed the responses and assigned primary theme and sub themes to assist with the evaluation of the DRAFT Recommendations. Attachment D includes the full responses received, sorted by primary and sub theme assigned.

- Assessment standards (3 responses): represents a response specific to method of assessment. Recommendations include:
 - Inconsistency between guidance and EAW form.
 - Create “significance” thresholds.
 - How many projects are expected to meet or fall below the 25,000 tons per year (tpy) threshold? Where did the 25,000 tpy threshold come from?
- Statement of Opinion – General Opposition (8 responses): Represents a statement of opinion opposing the DRAFT Recommendations. Responses include:
 - Statements of opposition that do not provide a recommendation to modify the DRAFT Recommendations based on costs, over regulation, lack of requirements in surrounding states, bias, etc.
 - Statements opposing a new EIS category
 - Statements of opposition over certain resources not being available or are inaccessible.
- Statement of Opinion – General Support (20 responses): Represents a statement of opinion supporting the DRAFT Recommendations. Responses include:
 - Statements of support that do not provide a recommendation to modify the DRAFT Recommendations
 - Statements supporting a new EIS category.
 - Statements of supporting stronger Environmental Justice review.
- Statement of Opinion – Neutral (6 responses): Represents a statement of opinion that does not either support or oppose the DRAFT Recommendations. This includes responses indicating support of involvement in the process but do not indicate support or opposition of the DRAFT Recommendations. Statements also included additional general activities or resources to consider as part of the process.

Attachment A

Interview Instructions and Record Form

EQB – ER/Climate Change, stakeholder engagement, **interview instructions/record form**

Instructions:

- Keep track of and be respectful of the interviewee's time. If the interview goes over the 30 minutes allotted it should be at the interviewee's discretion.
- The questions provided below are the same as the survey questions. Please attempt to obtain an answer for each question and ask the interviewee to elaborate or expand on their answers.
- Reserve the final 10 - 15 minutes of the allotted time to allow the interviewee to provide additional comments.
- The interview should be conducted in a conversational style. Allow the interviewee to do most of the talking, asking clarifying questions as necessary to learn more and verify your understanding.
- If the interview is conducted via video offer to put this record form up on the screen to allow the interviewee to see your notes. Offer to send the completed record form to the interviewee for review if requested.
- Assure the interviewee that the conversation and notes will be maintained as confidential within Barr engineering and the EQB technical team. The interviewees comments and statements will not be directly attributed to them in any public document or record.

Interviewers Name:

Date/Time:

Interviewee's Name:

Interviewee's zip code:

Please **highlight** the affiliation that best describes the interviewee in relation to the EAW process:

- Member of the public
- Environmental Justice expert
- Non-Governmental Organization
- Government decision-makers
- Tribal environmental expert
- Project proposer
- Regulated Governmental Unit
- Consultant
- Climate change technical expert
- Other

Additional Notes:

Please **highlight** interviewee's level of agreement/disagreement with the following statement: *I believe adding climate information to the Environmental Assessment Worksheet form will benefit Minnesota*

Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree

If climate information were included in the Environmental Assessment Worksheet form what types of information should be added? (highlight all that apply)

- How many tons per year of greenhouse gases (GHG) is emitted from the project
- The sources of GHG emissions
- The types of GHG emissions
- The types of practices that will be implemented to reduce GHG emissions
- The types of practices that were considered, but not implemented to reduce GHG emissions
- Whether GHG emissions were reduced by purchasing credits from other GHG reduction activities
- How GHG emissions from the project may affect achievement of the Minnesota Next Generation Energy Act goals and/or other more stringent state or local GHG reduction goals
- How the project can adapt to changing climate conditions
- Activities that will be implemented to ensure the project is resilient to changing climate conditions

Other climate-related information that should be included on the Environmental Assessment Worksheet:

Additional Notes:

If additional climate information were included, what additional resources would you need in order to provide that information or be able to put the information in context?

Additional Notes:

Please **highlight** the interviewee's level of agreement/disagreement with the following statement: *A new category requiring preparation of an Environmental Impact Statement related to greenhouse gas emissions is important for Minnesota.*

Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree

Please use the space below for additional comments interviewee shares about integrating climate information into Environmental Review Program.

Additional Notes:

Attachment B

Question 5 Responses

Question 5: Other climate-related information that should be included on the Environmental Assessment Worksheet:

Master List Number (IR Number)	Response	Theme
16 (20)	<p>What alternatives would be included to not just reduce emissions but yield positive benefits for climate? Development context should matter in terms of assessment.</p> <p>Proposals should include supply chain considerations.</p> <p>How we build for the future is as important as the above. How do ensure the project provides solutions as opposed to causing further problems?</p> <p>A different metric than NGEA should be used – the metric should be from the IPCC, 40% by 2030 and 100% by 2050. Our GHG emissions aims should be tied to the international standards.</p>	Related Projects
23 (6)	<p>I think the climate-related information that should be included on the EAW varies by subject. For example, the direction going on some of the water quality aspects – those are the right direction. When we talk about have you incorporated resiliency – gets back to thinking about what are you doing to plan For climate change occurring. How do you make this a real subject without giving people ammunition to be flippant about it?</p> <p>-I think you could do it on other items too. Add a discussion of the project overall focused on climate change as it relates to what the project proposer has done to anticipate change For this specific project. People will have to find some way of answering it. It is more about prompting the discussion and the thought process. For those that didn't consider implications of climate change on the project, is this a way to go back to the beginning and reconsider it.</p> <p>Thinks projects where air pollution is the trigger for mandatory environmental review, are probably already checking those boxes. It is about trying to find the middle ground between those who already have the answers to the climate change questions posed in the draft recommendations and those who would not be impacted by the changes posed in the draft recommendations.</p>	Water Quality
31 (9)	<p>An area of improvement is certainly the types of practices that will be implemented to reduce GHG emissions. Generally agrees that all of these items stay in the recommendations as provided. Recognizes there is nuance across the recommendations, but they are all important to understand emissions today and how they might be reduced as an outcome of the review process</p>	Project specific issues, RGU responsibility
19 (7)	<p>Should include carbon offsets. For example, emissions offsets from using natural fertilizer vs. manufactured fertilizer.</p>	Carbon Offset
25 (16)	<p>Some of the more detailed activities seem more appropriate for an EIS.</p>	RGU Responsibility
26 (15)	<p>I think for cities it is important to discuss the climate impacts that could be part of a project. When we talk about EAWs for small cities, the question of resiliency to climate change leads to the question of what does 'climate change' mean? Are we just expecting extremes everywhere? Some of that information would be helpful to the local government units. Climate change information is a general term and it would be important to understand from the LGU what that means to them</p>	Standardization

Question 5: Other climate-related information that should be included on the Environmental Assessment Worksheet:

Master List Number (IR Number)	Response	Theme
3 (24)	<p>Sometimes these projects are near of or are adjacent lands to state/wildlife/NGO lands. If a project is going to provide additional habitat or benefit - . Lay out these benefits and how it/the project/or component of the project augments the natural resource base of Minnesota</p> <p>Additional Notes: Opportunity to highlight the good work/projects Share info with State Agencies and NGO on where partnership opportunities exist – state funding partners should be reaching out to local units of government to see where partnerships can be created to be efficient with resources and tax dollars. There should be a calculator to include information about the economic impacts and costs with developing GHG information and for complying with implementing GHG project components as required through the process or permits.</p>	Natural resources, economics
34 (5)	<p>I really think that these projects should make a difference in reducing climate change, not just at a level to prevent more damage. I think we are at a point with climate change where we have to be quite aggressive and not just come up at a zero sum, but really make things better. I think that for projects below the mandatory category thresholds, should have to provide this information as well. I think we should also expand the list of mandatory categories to ensure the large amounts of urban area development area adequately addressed. The environmental regulatory bodies that we have, have a role in regulating and recommending changes to plan for climate change, especially when it comes to urban area development projects. I am surprised that of all the projects that occurred from 2016-2019, only 282 projects went through environmental review. That number seems too low based on all of the urban development occurring.</p>	Project specific Issues
14 (8)	<p>Would like to see a pretty comprehensive set of questions on mitigation in an EAW. Feels that a strong focus on mitigation allows a project proposer to highlight the steps they are taking to minimize GHG impacts, so that even high emission project types can look good in context.</p>	Mitigation
12 (14)	<p>The first thing that jumped out at me, science changes so quickly compared to regulation. Is there a way to build into the EAW form that there is a periodic scientific review of the methodology by which people would be calculating these things every two years? Something that doesn't have to go to rulemaking. To keep it a vital form, and to ensure the climate change information included in the ER Program is current. This would allow for the program to capture new advances in science related to climate change</p>	Adaptability

Question 5: Other climate-related information that should be included on the Environmental Assessment Worksheet:

Master List Number (IR Number)	Response	Theme
17 (23)	<p>Carbon sequestration changes from the project</p> <p>Additional Notes: Get back to the definition of climate change; I'm pretty heavily involved in water storage, agricultural draining, water movement, etc. A lot of downstream impacts that could be considered climate change related – if we'll have more erosion...if a wetland 100 miles downstream from a project will get wiped out/flooded because a project increases flow; that wetland also sequestered GHGs and now it won't. Maybe that's too in the weeds to include.</p> <p>Line 3 – the pipeline itself maybe not having a huge environmental impact, but it will enable movement of more fossil fuels that will have negative impact on climate change. So as a result of a project is there a climate change impact – the secondary results. Lifecycle analysis of a project. That was an EIS, but those are important environmental effects to consider in the environmental review.</p>	Standardization,
18 (13)	In a typical year, what proportion of EAWs are done on designated or known EJ communities?	Environmental Justice
21 (22)	<p>What materials are being used to construct the project and their embodied energy should be included in the calculation of GHG emissions from the project.</p> <p>Environmental services of the existing landscape and how that may be affected by the project and replaced one for one post project (e.g. carbon sequestration, urban heat island affect, habitat for at risk species).</p> <p>In response to the following "Consider the effects of current MN climate trends and anticipated changes in rainfall frequency, intensity and amount with this discussion"(11 Water Resources: b, II), the Climate Subcabinet and Advisory Council should provide guidance on how to use the data for what design events to evaluate the environmental impacts. This lack of guidance is a significant barrier which may result in a wide range of approaches/submittals. No standard template for how to assess impacts related to climate change and what values to use for mid-century (e.g. if just use average values the differences will not be so great between past, existing and future conditions but if look at the upper bounds of the IDF curves the difference are likely more significant). There isn't an incentive to the permittee to reflect more extreme conditions given the uncertainty in future projections.</p> <p>Applauds EQB for doing this and anticipates everyone will keep adapting as more tools and data are developed and made available.</p> <p>Is there an environmental equity piece to this in the EAW Form? What are the environmental impacts of the project and who does the project impact directly and/or indirectly?</p>	Standardization, Environmental Services Impact, Urban vs rural

Question 5: Other climate-related information that should be included on the Environmental Assessment Worksheet:

Master List Number (IR Number)	Response	Theme
33 (21)	<p>Ask which emission model/scenario are using and what timescale are looking at – 2080’s, 2050’s?</p> <p>It will be a lot for people so whatever tools or resources can offer to make it easier because is a whole additional scope of work – but loves it</p> <p>Additional Notes: Do project design, but also do planning work for cities on setting GHG emission goals. EAWs are often done before project design goes out for bid. Would love to be involved in Environmental Review but often gets done before architectural firm gets involved. Would be able to help the project if involved earlier. ER process if more integrated with architecture and engineering could be more impactful. GHG emissions parts will require a more interdisciplinary approach and that is great. Are they actually looking at the impacts of the project when done so early – where does the information come from? Do you want this to actually be about the project’s design or just the feasibility of such a project? We do actual lifecycle analysis – what looking to gain, what is the timeline? So when EAW is done determines how much the information is actually about the project. Otherwise is rule of thumb not analysis of actual impacts.</p>	Initial vs. long-term, Emission modeling
37 (17)	<p>Regarding GHG emission from the projects, it could be interesting to consider or break down initial (construction) versus long-term emissions (e.g., from concrete)</p> <p>Regarding “How GHG emissions from the project may affect achievement of the Minnesota Next Generation Energy Act goals and/or other more stringent state or local GHG reduction goals”, although it seems relevant – it may be a difficult prompt to address as a project proposer. Tracking achievement may be up to the MPCA</p>	Initial vs. long-term
40 (12)	Maura noted that the RGU should take a role in the responsibility of owning the impact analysis as it relates to GHG.	RGU Responsibility
22 (19)	<p>Thought the de minimus level in there was fine, talked about the benefit that if the information was readily available and did not cause a burden on the proposal then we should. If it is not too hard and someone wants it, why battle. I believe the previous threshold was good enough and if you want to go below that filter should say provide readily available information.</p> <p>An example provided was, if we have a mandatory EAW because of a duplex renovation in St. Paul that’s a historic property. Is it worth making them pay a consultant to get the GHG emission information when they are using some standard natural gas heater. (innovations to heating in this case would benefit the proposer, not having them fill out an EAW form that asks for climate information; compared to other project types this duplex would likely be minimal GHG emissions)</p>	Economic impacts, Information access
35 (25)	<p>How this project compares to similar projects worldwide (from a GHG standpoint)</p> <p>Additional notes: important to remember this is a worksheet, and not an in-depth study. Tabletop estimates should be acceptable for a worksheet.</p>	Related Projects

Question 5: Other climate-related information that should be included on the Environmental Assessment Worksheet:

Master List Number (IR Number)	Response	Theme
15 (18)	<p>Starting proposal is a strong starting point. Thorough mitigation analysis is top priority for addition. Projects below the proposed 25,000 TY threshold would benefit from assessment of mitigation opportunities. Threshold is too high. Projects will fall through the cracks. Goal is reduced emissions. Should be identifying mitigations for all projects and making that information available to the public. Proposers should think broadly beyond single mitigations. Support quantification of mitigations for all projects and eliminate the threshold. If threshold stays, qualitative analysis of mitigation options beyond just the ones they are implementing should still be discussed. Value is not in triggering EIS it's in providing information to decisionmakers about what mitigation is possible. Mitigation analysis provides learning opportunity about what types of mitigation measures are feasible and effective for different project types</p> <p>Next most important piece: guidance on how RGU's should assess GHG information, "significance". Would be helpful for EQB to provide ideas for how RGU's could assess the information. Perhaps not a mandate but suggestions about how RGU's could assess "significance". Adoption of mitigations seems like a way around an EIS (a way to avoid a situation where every project is triggering an EIS because they have emissions). But the only way to incent voluntary implementation of mitigations is if there is still a possibility of an EIS if emissions go unmitigated</p> <p>Modifications to the EAW form: EJ, climate adaptation question. How are additional emissions making it worse for disadvantaged populations. This is a better approach than using cumulative effects analysis</p>	Mitigation, standardization, Environmental Justice
45 (26)	Is the project in an environmental justice area (referring to EJ areas map put together by MPCA). Cumulative impacts of project.	Environmental Justice, Project Specific Issues

Attachment C

Question 6 Responses

Question 6: If additional climate information were included, what additional resources would you need in order to provide that information or be able to put the information in context?

Master List Number (IR Number)	Response	Theme
16 (20)	<p>A different metric than the NGEA should be used – the metric should be from the IPCC, 40% by 2030 and 100% by 2050. Our GHG emissions aims should be tied to the international standards.</p> <p>There are major contributors to GHGs as well as little contributors. We need transformation everywhere, big and small. It is possible to get there. The idea of thresholds is problematic.</p> <p>What is the right level of GHG that a project can emit without triggering ER? To be successful, we need to consider how we are building forward. All projects need to contribute to the solution, not the problem. For instance, repurposing land in a better way.</p> <p>The cumulative effects are critical to understand the overall impact (big and small). We could end up with guidance documents and an EAW form that is robust – if the project doesn't become a net positive in terms of GHG net zero, it should go to EIS. All of this could be done without rulemaking right now.</p> <p>Rulemaking is probably needed for thresholds. What is the amount triggering either denial of a project or EIS? Threshold should go to net zero – in other words, anything over net zero requires an EIS.</p>	International Standards, Rules and regulations
23 (6)	<p>The EAW doesn't necessarily spell out everything as precise as we like it. But it gives everyone an opportunity to comment on the project and the project proposer the opportunity to modify the design. Consequently I don't worry about the initial document, I worry more about the outcome of the review than what is written in the first place. Recently, responses to comments have gotten more philosophical, it's not a straight comment-response opportunity. There's a lot of education going on in the comments provided. For example, instead of people saying "you're using too much water", they're now saying "do you need a dewatering permit?, Have you considering ways of using less water?"</p> <p>I know the information is out there to conduct the calculations proposed in the draft recommendations. You could use the resources already listed but there's some contradiction to some of those. Different inputs lead to different outputs. We have to be mindful of and watch out for contradictory sources. It would be great if EQB could provide an explanation about why a resource is recommended in the guidance documents. It would be helpful for those who just want to answer the question qualitatively but are not equipped to quantify. It would be great to be able to use qualitative information to satisfy things.</p> <p>Honestly, we don't have a person on staff who could help answer those questions and would struggle with that. How does an RGU, review for completeness and determine accuracy without double checking the complex math? Yes of course provide it, but you may get someone just filling in the formula and not understanding what the numbers they are inputting actually mean.</p> <p>I think depending on how serious the EQB is about incorporating climate change into the ER Program and how integrated it becomes, we would need guidance documents, webinars, in-person training events, etc... Particularly if this would result in something that stops a project from going forward, results in a positive EIS Need Decision, or just an EIS to begin with. You have to steer the resources towards what you are hoping to see.</p>	Guidance from EQB, standardize responses
31 (9)	<p>Key additional pieces of information that would be helpful is a better understanding of Scope 3 (indirect) emissions. Those are identified through the GHG protocol (often baseline documents/protocols for this kind of project-level reporting). The system boundaries of identifying Scope 3 is difficult, but largely ignoring them can be problematic</p>	Guidance from EQB
19 (7)	<p>Would like to have unbiased research from universities that provides the information needed to respond. Also need ability to address concerns without addition monitoring (as that could be cost prohibitive).</p>	Unbiased research, Address concerns without monitoring
25 (16)	<p>Environmental justice</p>	Community views
26 (15)	<p>Small cities need access to more environmental experts. We often have smaller staffs who do a lot of work. Especially in the world of engineering and environmental review, we just don't have the staff that larger city counterparts do. It would be helpful if we had places or people within state government that we could go to, to get information to help answer the questions related to EAWs or EISs. Someone that we can reach out to and ask "What does this mean for us and our city?". If additional climate information were included, we would need better access to state agencies or environmental experts</p>	Increase RGU funding

Question 6: If additional climate information were included, what additional resources would you need in order to provide that information or be able to put the information in context?

Master List Number (IR Number)	Response	Theme
3 (24)	<p>More money or higher level funding from the State</p> <p>Additional Notes: If we're required to include more natural resources enhancements (habitat/WQ/climate resiliency) – it'll cost more money to engineer, design, O&M, project might end up being bigger (more land—maybe?). Need to get back to how do we fund projects—when these ER rules/EAW changes could require/bring about more costs to the project(s) Example: State flood Haz. Mitigation Program -- \$400M in statewide need. Last year the Leg. only funded \$17m. Huge backlog, need stable funding—this is a statewide issue. We'll never be done with this work, it will always continue. We need to figure out stable funding and be efficient with the funding—at some point need to allocate more funding for this issue.</p>	Increase RGU funding,
(5)	<p>With the increased information being provided, I would like to see that be a real priority to increase the amount of staff at RGUs to do the work, so there can be an impact on climate change. We know that reforestation absorbs a lot of greenhouse gases and carbon. I'm seeing in a specific city, trees identified for removal for emerald ash borer, but any effort that goes into saving them, the homeowner bears the burden of that cost. Removing all of these trees really changes the neighborhood. Those seem like things that could be mitigated to me with some concerted effort. I would like trees and greenspace to really be emphasized in the EAW form.</p>	Increase RGU funding, Mitigation factors
(8)	<p>Would like to see a very clear ER process guide that allows project proposers and consultants know where they are in the process and what's left to accomplish. This type of flowchart would help the proposer expedite the process.</p> <p>Thinks that an introduction/guide to carbon markets (where are they and how to engage in them) would be very useful. This info would make purchasing credits a more realistic mitigation measure, especially for smaller projects.</p>	Environmental review guide
12 (14)	<p>Is there a tool where you could plug in variables of a project and get a social-economic-environmental assessment? That's what I would need to understand the full impacts of climate change from a proposed project on a community. If there's some tool that you can translate all of these variables into a rating scale. It would be hard to find a tool that would provide both sides – provide complex calculations for the RGU, but then provide the information as understandable for the public</p>	Community views
17 (23)	<p>If I were completing an EAW and was doing it from a totally neutral stance (rare) – assess the environmental impact without any preferred outcome in mind, I would want access to as much peer reviewed scientific data on similar or similarly positioned projects as possible. I would want some guidance on where to find that information. If I do a google search on “negative environmental impacts of gravel mines” I probably won't get the right quality of information unless I get lucky. How to find validated scientific information?</p>	Unbiased research
18 (13)	<p>It would be nice to see if this project will increase community concern for EJ and how will that be assessed.</p>	Community Views
2 (4)	<p>Context is really helpful, like a pie chart, to help us understand the bigger picture of emissions from different sectors. Information about mitigation strategies would be really helpful. What are the options, what can agencies and companies do? Many Tribes are doing a lot in the areas of mitigation and adaptation, more information and examples about what people are doing would be really helpful.</p>	Guidance from EQB, Mitigation factors
21 (22)	<p>The Guidance is important as discussed above and what design values to apply because averages will mask changes. It would be helpful if the EQB provided a standard approach so that permittees understand how to simulate the impacts of climate change w/o defaulting to the lowest common denominator. It may not be one approach, it may be running a series of approaches/models to capture a range of scenarios and selecting the worst-case scenario for planning purposes</p>	Guidance from EQB
33 (21)	<p>Ideally would be tied into statewide climate projection data – go here, get this dataset, do it this way</p>	Climate projection data
22 (19)	<p>II think if the state of MN wants this in EAWs, they should do as much as they can to provide standard responses to questions. I'm told that consultants are out there that want... (think Bryan Murdock's head of cattle standard, e.g. if my farm has 1500 head of cattle I can say my feedlot is emitting X TY GHG)</p> <p>Data shows that RGUs are LGUs, LGUs overloaded the state will need to provide them a lot of information to help them out</p>	Standardized responses

Question 6: If additional climate information were included, what additional resources would you need in order to provide that information or be able to put the information in context?

Master List Number (IR Number)	Response	Theme
35 (25)	<p>For feedlots, natural land sinks should be included... however, based on simple calculations that would exclude feedlots from any inclusion in EAW climate calculations since those numbers virtually even out</p> <p>Additional Notes: would be justified to utilize the science behind carbon 14 dating to exempt animals and plants involved in the feedlot carbon cycle</p> <p>Ex: calculations of acres x plants for carbon storage equivalence. Same with adding manure back into the ground</p>	Land sink
45 (26)	Context for what the GHG quantification numbers mean. Map areas affected by the project.	Guidance from EQB

Attachment D

Question 8 Responses

Question 8: Please use the space below for additional comments you would like share about integrating climate information into Environmental Review Program.

Number (IR Number)	Response	Theme	Sub Theme
15 (18) b	Inconsistency between guidance and EAW form. EAW form calls out some specific scope 3 emissions. Should include potential other scope 3 indirect emissions beyond off-site waste management. Suggested some additional text suggesting proposer should include other obvious scope 3 emissions.	Assessment Standards	Recommendation
18 (13) a	In a typical year, what is the range in Projects proposed that falls below the 25,000 tpy and how many fall in the >25,000 tpy? The 25,000 tpy threshold... where does it come from and what would it take to change it? Is this something that could be changed? What is the impact of the threshold on EJ communities?	Assessment Standards	None
22 (19) a	Create some thresholds over which something is significant, so people aren't too concerned about this.	Assessment Standards	EIS Threshold
17 (23)	I'm pretty moderate on this stuff, but one frustration I see is that there are these processes that when they are actually implemented there is so much wiggle room/room for interpretation, that you don't really end up with much. This gravel mining – I read the EAW prepared on behalf of the township – “will this project increase water runoff” and the answer was that no because all water used would be impounded (water you pump you're going to retain in a reservoir and hopefully reuse) but right you have 80 acres of slightly sloping wooded property, rainwater absorbed and gradually seeps into river. The EAW took the most narrow view, narrowed to the point of being able to say no impact. I read it and ask “what about this? Or that?” I think the whole process leaves way too much discretion on how to answer the questions. Another serious problem – I don't think the RGU should ever be a local unit of govt that would be the beneficiary of tax revenues or be likely to be influenced by powerful actors who will steer the env assessment process to get the answers they want. I think the RGU should more often be DNR, PCA, sometimes MNDOT depending on the project. I think it's good to include climate; I don't know where a township or county will go to get the info to answer those questions – especially if broaden to lifecycle impact.	New/Modified Recommendation	Recommendation
18 (13) b	ER tech team supports local discretion... When will the more robust regulatory structure exist?	Other	None
19 (7) a	The private sector has already committed to significant reductions (e.g. pork industry has committed 70% reduction by 2030, dairy farms have committed to net zero by 2050).	Other	Feedlots
19 (7) b	The carbon trading market is in its infancy, and there's concerned that the ability to trade in it will be limited with regulation.	Other	Mitigation
19 (7) c	Changes to EAW form increases time to complete form more than it actually changes practices.	Other	Change
19 (7) e	Important to note that Forestry and Ag are main industries that are capable of being carbon sinks.	Other	Mitigation
23 (6) b	A few questions I have about the draft recommendations: What happens with the information provided through environmental review? Is someone using the information or just satisfying the requirement of the ER Program? If it's just data gathering, it would change my thought process. This is in part because of the variety of RGUs and project proposers.	Other	None
28 (11) c	Has some questions/potential concerns about whether purchasing RECs would or wouldn't be offsetting electricity specific to the project. He wasn't fully sure about this though.	Other	Mitigation
19 (7) d	This topic is not necessarily the place for the state to be involved in climate reporting. Private sector efforts and federal initiatives will make this level of state reporting redundant.	Statement of Opinion - General Opposition	Statement of Opinion
22 (19) b	If you really need an analysis, don't shoehorn it into MEPA, have some alternative format that if you're really concerned about climate change; have them do a greenhouse gas worksheet, don't fit them into an EIS. Some people believe that there is not such a thing with too much information, I think if you overload you could create opponents to the process which would be a great risk to the environment. If you're asking for something make sure that there is really good justification, make them know, yes we will use this information. Let them know how we will use that information.	Statement of Opinion - General Opposition	Recommendation
23 (6) a	I think the best approach would be to include a new question at the end, specific to resiliency, to prompt people to incorporate the information rather than quantify the contribution. My biggest recommendation would be to include guidance on Minnesota view not a per project view. Every EAW will say they are not contributing significantly in terms of cumulatively in Minnesota. I would be much more in favor of the State providing the appropriate level of review, through other permitting processes or dedicating a study towards it. On the basis that few move onto an EIS. I don't think you're going to get as robust of an answer in an EAW as you would like.	Statement of Opinion - General Opposition	Recommendation
28 (11) e	The DOT link for the Highway mobile combustion sources, highway construction tool does not work. Disagrees with this statement in the recommendations (thinks there are cases where de minimis would make sense, and also noted there needs to be a reason you're doing something – if there's no reason to calculate de minimis emissions, not appropriate to ask for it be done): The ER Climate Technical Team reached consensus that all proposed projects will benefit from quantification of potential GHG emissions.	Statement of Opinion - General Opposition	Statement of Opinion

Question 8: Please use the space below for additional comments you would like share about integrating climate information into Environmental Review Program.

Number (IR Number)	Response	Theme	Sub Theme
31 (9) a	<p>Noted that the current recommendations focus on what are considered by the GHG Protocol as Scope 1 and Scope 2 (more operational emissions) emissions associated with the project.</p> <p>Believes that by focusing on those and assigning the 25k ton category as the threshold for more detailed impact assessment/mitigation, there will be very few that meet this 25,000 tons threshold. This means that most reviews could potentially miss a lot of opportunity to improve environmental solutions from the state. Provided a couple of examples to check to see if commonly proposed projects would meet the 25,000 tons threshold. He found few that would meet the automatic review process for the EAW process and found very few that meet the 100,000 tons EIS category.</p> <p>By proposed projects not meeting these thresholds, you miss all the socioeconomic components of the review. By doing so, you miss the opportunity to assess those indirect impacts.</p> <p>Industrial and residential examples of the scenarios considered in commentor's examples included:</p> <ul style="list-style-type: none"> ☒ A medical facility where commentor estimates that the medical facility would need to generate 4.5 billion dollars to trigger the 25,000 tons threshold. ☒ A poultry farm where commentor estimates that the farm would need to generate 25 million dollars to trigger the 25,000 tons threshold. ☒ Noted that if you were to include indirect emissions from things though (like the corn to feed poultry, transportation, etc), it would be more information to look at those indirect effects. <ul style="list-style-type: none"> • Generally, indirect effects both in MN and even outside of MN where the effects still have the potential to impact Minnesotans, seems relevant. • Noted that it is important that the 25,000 threshold number be grounded in science. He said the impacts are usually addressed in 2030 – 2050 timeframe. So, the annual thresholds are one thing... but the impacts are typically reported as parts per million and reductions off of those to address climate change impacts or biodiversity (50-80% reductions to avoid those kinds of impacts). But the review process doesn't necessarily incorporate that. The annual threshold should reflect that science-based impact assessment over the period of time. Whatever we put in the ground today, it's certainly going to be there in 2030 to 2050. So, we should also be employing that science-based and the trajectory of the future. Opinion is that either the indirect emissions should be accounted for in trying to meet a high threshold like 25k tons, OR that 25k tons threshold should be reduced to trigger a more rigorous review of more projects to account for the associated socioeconomic review. 	Statement of Opinion - General Opposition	EIS Threshold
31 (9) b	<p>Provided the following thoughts on the more systemic issues:</p> <ul style="list-style-type: none"> ☒ Environmental review process as the appropriate place to address climate change <p>Commends the committee for trying to incorporate these recommendations/ changes and understand it's not easy.</p> <p>Wonders though if the environmental review mechanism is the right way to address this... and in looking at other projects and how they get done, feels there's misalignment between what's getting a lot of review and what's resulting in significant impacts. Noted this is a result of review happening at a snapshot in time and focused on traditional, local impacts</p> <p>In general, thinks it's possible you can end up with a mechanism that might ultimately be hard to drive reductions.</p>	Statement of Opinion - General Opposition	General Opposition, no Recommended
31 (9) c	<p>Noted that a threshold drives more of a permitting like approach to the problem and this isn't a one and done issue at design challenge. Most corporations are addressing climate emissions by identifying current emissions under existing proposal, then looking at targets and goals and establishing what they'd look like for reduction based on current technologies, and then they tend to look at a more forward-looking set of commitments on how you'd achieve those reductions.</p> <p>Not sure that environmental review is set up to address those changes so it's almost like there needs to be some sort of post-commissioning review phase as well. Somehow addressing the issue of: "where are there potential opportunities to revisit emission reductions?"</p> <p>Would like to see means of providing more opportunities for new technologies to be required at a later date so you're not locking in reductions at a certain time scale.</p> <p>Doesn't want to suggest that we not do these things recommended in the report. Said they're good things to do, even if imperfect. A bit worried though that if this is the primary mechanism that we're going to use to implement change, then a whole lot of projects with a whole lot of impact won't be subject to a mechanism of re-addressing reductions later.</p> <p>Thinks the key goal is to address reductions required through existing policies like the Minnesota Next Generation Energy Act, it's a matter of how best to achieve that.</p>	Statement of Opinion - General Opposition	Recommendation

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Number (IR Number)	Response	Theme	Sub Theme
31 (9) e	Noted that EIS review can often promote one economic gain (jobs) over other direct impacts. Recognized that the recommendations could be onerous for smaller projects. But also said there's a wider swath of the economy that should be considering this approach, and they're going to be missed if we look at current thresholds.	Statement of Opinion - General Opposition	Statement of Opinion
12 (14)	It is sort of like what is taking us so long. Our state is warming, look at the data. We are doing an experiment on our species. Some of this may be beyond our control, but we should control what we can. EQB needs to step up and make some bold change in a state that has been a leader. It's a call to action for the EQB. This is not news. Everyone is fiddling and Rome is burning. Get off your butt and do this. Maybe this will be controversial but you could be talking about saving people's lives, homes, livelihoods in the end. And this is the little piece that EQB controls. Every effort to engage with the broader	Statement of Opinion - General Support	Statement of Opinion
14 (8)	Gathering as much info as possible benefits both public decision-making and the project proposer, however it can't be an onerous level of work – there needs to be a clear distinction between the work needed for an EAW vs the work needed for an EIS. Understands the difficulty in achieving this compromise, and applauds us for the effort we're investing in trying to define that compromise. Applauds us for the level of public outreach we are doing.	Statement of Opinion - General Support	General Support, no Recommended Change
15 (18) a	In favor of adding a new mandatory category	Statement of Opinion - General Support	General Support, no Recommended Change
23 (6)c	For the land cover chart: I am unsure how we would get that specific information with some of the projects we currently have going on. It could be a challenge to get that specific. For land use under item iv, I support including a discussion in the form about building in floodplains and areas likely to be wiped out. That's great question and modification to the form.	Statement of Opinion - General Support	Recommendation
23 (6) e	Training opportunities can help increase the amount of understanding on the topic. Video, webinar, in-person events, guidance documents. But I think that until people are comfortable with it, you're going to see bad discussions due to a lack of understanding of the subject matter. For the typical preparer, this may be the one subject they are weakest on in terms of preparing an EAW. It just takes time. Don't stop moving forward with integrating climate change, but do it in stages. Start with having it voluntary to see how people deal with it. A beta test. Start with 2-5 areas within the EAW form that are tweaked to incorporate it. Include one at the end which focuses on, "how are you incorporating resiliency into your project? Discuss GHGs and any other emerging issues." Prompt people to think about it, rather than quantify it. I think it makes more sense to make resiliency one question, rather than sprinkled throughout.	Statement of Opinion - General Support	Recommendation
26 (15)	I think understanding what the potential impacts of climate change are is important. We have a unique state geologically and we are seeing impacts vary in areas across the state. What clean water means to cities in southern Minnesota varies compared to northern Minnesota, who do not have the same issues with nitrate levels in water. It is important to acknowledge what climate change means for the different areas of our state. Climate change may significantly impact some parts of our state more than others. We need to be clear about what we mean when we say "climate change" in terms of environmental. Putting a definition to that would create a more solid perspective in environmental review and may be more helpful	Statement of Opinion - General Support	Recommendation
28 (11) d	In general, is that he thinks these regulations triggering more RGU calculations is a good thing. Is supportive of the idea of including assessment of the lifetime GHG emissions.	Statement of Opinion - General Support	None

Question 8: Please use the space below for additional comments you would like share about integrating climate information into Environmental Review Program.

Number (IR Number)	Response	Theme	Sub Theme
31 (9) d	<p>Most of the work is in corporate space. Microsoft trying to reduce emissions but they're most in the suppliers. And most of this is in information flows. And not doing something about those information flows. Increased taxes and shadow prices across organizations and all of a sudden there's implications in what number you put down and how you bring that number down. Can't talk about bringing that number down and so far no one is good about understanding what that number is. Need to make projects think about what their number is so that there is a mechanism in place to address those reductions and manage those emissions. That is what the Next Generation Act is saying what to do so we need this type of information. And we need a review process at what that policy is setting, think it's a 2025 and 2030 target.</p> <p>Should there be a target around carbon? Yes, but... Is it really worth triggering the whole EIS process? Uncertain.</p> <p>Would like to see socioeconomic included, but that's beyond this review process. Carbon should drive something more review than EAW, but not for a small residential process... which is where most action is, so worry that making this more rigorous won't hit the right market. While there are flaws, important to get something into policy and environmental review and hopefully there are improvements over the next 5-10 years. Agrees it is also important to address adaptation but sees that as more of an economic mechanism for considerations.</p> <p>The adaptation argument is much more economic. It's a matter of recognizing both that there will be changes to climate change per this project, and the question of asking "will the changing climate make this project less viable?" This is an important thing for the proposer to be thinking about. The private impact of not thinking about it might be more detrimental to the proposer from an economic perspective. It's a service to the project manager to think about it. Nobody wants a project to be approved and not be successful. Primary benefit to society is that we put highly efficient projects in place, at the lowest amount of environmental impact. The mitigation piece is then more a bigger factor for public benefit than the adaptation piece. All that said, it's still important to have a process to think through that.</p>	Statement of Opinion - General Support	Recommendation
33 (21)	Glad that we are looking at it!	Statement of Opinion - General Support	General Support, no Recommended Change
34 (5)	<p>Would like to see an expansion of an attention to climate change and environmental review. Need to see education of the public on this topic. There's a lot of really good things in the draft recommendations, and I really hope that they are applied in ways broadly enough so that they really make a difference for climate change in Minnesota. Successful application of the draft recommendations to me would be progress towards stopping climate change and reversal. I think experts are telling us what we need to do, and we need to do it at whatever cost. Individual contributions and in a broader way with government support.</p>	Statement of Opinion - General Support	Statement of Support for Recommendations
37 (17) a	<p>Interested in seeing that the thresholds don't unnecessarily capture negligible emissions. Overall, is in favor of these changes but can also consider the potential implications to those completing the EAW. Wondering if the "environmental review" referenced as an exemption to the new EIS category would include USACE NEPA reviews since their EIS's often look at all environmental impacts.</p>	Statement of Opinion - General Support	General Support, no Recommended Change
37 (17) b	<p>Would be interesting and nice for the transportation category, if there's any chance of a project that's less than the existing thresholds of the 100,000 tons for that to be identified and understood by county public works departments.</p>	Statement of Opinion - General Support	Recommendation
40 (12) a	<p>Thinks that one of the recommendations is that there wouldn't be any change to the EAW categories. Curious to understand the thought process behind that.</p>	Statement of Opinion - General Support	Statement of Opinion
40 (12) b	<p>Assumes that some stakeholders will ask that the 100,000 ton threshold for an EIS be higher, and wants to go on record to say that it could be lower and she would support it going lower</p>	Statement of Opinion - General Support	Statement of Support for Recommendations
40 (12) c	<p>Suggested that asking the questions is a really good first step in ultimately making a difference for racial equity. They support these questions being asked on as many projects as possible because they have experienced what gets measured, counts. Once something is quantified, the more attention folks give to it. Organization have a lot of experience measuring outcomes aggregated by risk. Have seen significant shifts in the work whenever they ask for this quantification to happen. Environmental justice impacts are incredibly important. Generally, the socioeconomic and demographics of the area in which projects are proposed should be connected to the GHG questions and other questions.</p>	Statement of Opinion - General Support	Environmental Justice
1 (10) a	<p>The tribes are very interested in how stormwater and climate change may effect historic and cultural sites.</p>	Statement of Opinion - Neutral	Statement of Opinion

Question 8: Please use the space below for additional comments you would like share about integrating climate information into Environmental Review Program.

Number (IR Number)	Response	Theme	Sub Theme
23 (6) d	For the fish and wildlife section (item 13): When you add the question about how will climate change affect this, it becomes a bit of a wildcard because you are sorting out the differences between impacts from the project versus regional/state/external causation. How do you incorporate that at the project level? What are you doing versus what are you contributing towards happening? These are two very different questions. Above all, I think integrating climate change into the ER Program is the right direction. I think incorporating components would be supported on the basis of triggering thoughts about climate change versus adding highly technical tasks that RGUs will struggle to answer or defend. It's just not a well-known enough subject.	Statement of Opinion - Neutral	Statement of Opinion
28 (11) a	Importance of the anticipated trickle-down effect of GHG assessment (and goal setting) occurring at the local government level.	Statement of Opinion - Neutral	Recommendation
28 (11) b	Clear Path: Local Government Action Climate Tool is not a free program but said that many protocols for city wide operation are free.	Statement of Opinion - Neutral	Costs
28 (11) f	Noted that potential of double counting should be considered. As an example, if wastewater were to be used as a biofuel, double counting would need to be avoided. Recommends adding in a note to this effect. Noted it seems nebulous to consider landfill gas a biogas (as that would only apply if it were being used as fuel). Prefers metric measurements. Cost of carbon as a means of quantifying mitigation efforts and success. Ability for local government to provide input into projects' GHG emissions through the EAW process, using the assessment of GHG calculations/costs (as well as cost-benefit analyses based on cost of carbon) and potentially using subsidies as needed. Proposed consideration of dB (count before and after) instead of tree canopy as tree canopy is hard to measure at the project scale.	Statement of Opinion - Neutral	Recommendation
25 (16)	Separately from GHG, the subject of resiliency challenges should also be considered in environmental review or some other place. Has not had an opportunity to review the proposed changes in detail but has not heard about concerns from members to date. Typically, hears about concerns after the changes are in place. Cities are both proposers and RGUs (often for projects related to water impacts). In thinking of some of the proposed changes in terms of both as the proposer (e.g., wastewater expansion) and as the RGU responding if a proposed project comes in... doesn't think that they'd be able to adequately respond. General theme of thoughts is that availability of current and consistent data could be concerning because they (i.e., the RGUs or proposers) don't have a way to verify the way they (the person completing the EAW) say the climate change is characterized if they don't have a consistent place to compare that against to. No one can go out and do their own climate change impact so there will need to be good guidance. Otherwise, they'll be guessing or say, "not aware of any." We (as a society) are not necessarily doing well with crystal ball of knowing what climate change impacts will be – they need a reason to say something is not adequate. It can't be a guess.	Statement of Opinion - Neutral	Statement of Opinion
1 (10) b	Wild rice can only grow within certain climates and at certain times of the year. If the climate keeps changing, it is a threat to this sacred resource. It is imperative to keep in mind that wild rice, which Ojibwe people consider as part of their identity, is threatened by climate change. Having a relationship with existing tribal members, and maintaining ongoing relationships and be able to listen and take into consideration what the tribe's needs are very important. Tribal contact list is maintained to MPCA, it includes contacts for folks that focus on climate change, food sovereignty (wild rice), etc. This list is publicly available on the MPCA website. Noted that the people listed in the contact list are the experts and would have more familiarity with the resources and permitting processes. The people listed in this contact list can be reached by anyone	Support for Specific Recommendation	Statement of Support for Recommendations
1 (10) c	Tasked with protection of grave sites and burial grounds. There was a multi-million dollar effort in Fond du Lac for reburial in recent years and with the warming of weather, the hill thawed early and the melting causes unintentional unearthing of human remains. This was a significant source of pain and it is things like this that significantly impact tribal peoples.	Support for Specific Recommendation	Statement of Support for Recommendations
2 (4) a	There is always room to improve on transparency and the timing of getting information to Tribes and comment periods, etc. Information needs to come early, and getting the word to Tribes as early as possible is really important.	Support for Specific Recommendation	Statement of Support for Recommendations
2 (4) b	Some resources for EQB in thinking about Environmental Review and Tribes: MPCA and Forest Service have strong guidance about working with Tribes and that is something we could look at. Use State Tribal Liaisons as a resource. Reach out to MNTEC to get more perspectives.	Support for Specific Recommendation	Recommendation
16 (20)	A lot of this could and should happen without rulemaking. Alternatives piece should be in the EAW worksheet. Clear guidance could make this possible. Every project should go through this process. Any development that is not a net positive should trigger the EIS. The measures and alternatives should be clearly delineated	Support for Specific Recommendation	Recommendation

Question 8: Please use the space below for additional comments you would like share about integrating climate information into Environmental Review Program.

Number (IR Number)	Response	Theme	Sub Theme
45 (26)	Working on cumulative impact legislation this session. BIPOC communities are interested in this and it is a concern.	New/Modified Recommendation	Recommendation