35532 Environmental Quality Board Posthearing Comment Period

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TOPICS

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SUMMARY OF TOPICS

SUBMIT A COMMENT

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Mike Tauber · Citizen · (Postal Code: unknown) · Jul 12, 2019 10:00 am づ 0 Votes

The wording in 4410.4300 Subp.36.A. and B. should be modified to reflect the fact that installation of center pivot agriculture is a permanent conversion and should be considered the same as a golf course. The investment in such irrigation methods means converted land will stay that way until the profit motive is gone. This would give local government units better oversight of local impacts, in that an 80 acre threshold would trigger an EAW, instead of the often approached, but seldom crossed, square mile (640 acre) threshold that has done almost nothing to protect resources and ecology. Also agriculture, native prairie, forest, and naturally vegetated land designations were in the past considered one and the same in the state's eyes but this is no longer a tenable view, since one is overtaking the others to the detriment of all. Industrial agriculture, in particular, makes this very clear and creates the need to separate that designation from the others

4410.3600 Subp. 18. B. Currently lists public and private forest management projects, other than clear-cutting or applying pesticides, involving less than 20 acres as exempt. If enforcement of MN statutes were taken seriously this would be a reasonable exemption, but projects that involve clear-cutting and applying pesticides take place on a massive scale, regularly converting (without attention from RGUs) thousands of acres of forest to field, particularly in the sandy outwash plains of central MN like the Pineland Sands Area.

4410.4300 Subp. 8. Rule change would add sizable silica sand projects to the mandatory EAW category and name the PCA as the RGU. Long overdue, mystifying as to how this type of project could go so long without being added to the mandatory category. Places like the Kasota Prairie have been brutalized by silica sand mining at will. 4410.4300 Subp. 22. Mandatory EAW threshold would go from one to two miles, and

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auxiliary lanes are excluded. At a time when ecosystems along side roads are experiencing increasing negative effects from deicing chemicals, right-of-way ATV riders and exhaust it seems this is a step backwards in Environmental Review. If anything, the mandatory threshold project mileage should be reduced.

Erik Cedarleaf Dahl · Citizen · (Postal Code: unknown) · Jul 16, 2019 2:24 pm づ 0 Votes

Attached is the Environmental Quality Board Posthearing response to comments.

- 1) Memo on the posthearing response
- 2) Responses
- 3) Comment Spreadsheet
- 4) Executive Order 19-17

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