MINNESOTA
ENVIRONMENTAL QUALITY BOARD

Memo

Date: January 19, 2022

To: Environmental Review Implementation Subcommittee

From: Subcommittee for Pilot Program Implementation

RE: Pilot Program framework and metrics

In September and November 2021, Environmental Quality Board (EQB or Board) members voted to approve a Pilot Program for integrating climate change into environmental review by updating the Environmental Assessment Worksheet (EAW) form, and convene a subcommittee to oversee implementation of the Pilot Program.

The purpose of the Pilot Program is to test and evaluate proposed changes to the EAW form on current projects. Specifically, the Board seeks to evaluate whether changes made to the EAW form result in usable climate information for diverse audiences. Additionally, they will evaluate whether project proposers and Responsible Governmental Units (RGUs) are able to efficiently provide consistent and accurate climate information with support from available guidance and tools. The Pilot Program is not intended to decide whether climate information should be included on the EAW form.

The Subcommittee for Pilot Program Implementation (SPPI) was formed by the Board to steer the design of the Pilot Program and ensure Board members have sufficient information for informed decision making on the proposed changes to the EAW form. The SPPI held meetings on November 30 and December 9, 2021, to discuss the design of the Pilot Program and consider draft metrics for EQB staff to use to collect information during the Pilot Program. SPPI meetings also provided opportunities for members of the public to engage with SPPI members on the draft Pilot Program design and metrics.

The Pilot Program framework outlined below is designed to encourage a wide range of project proposers and RGUs to practice using the draft revised EAW form and guidance, and provide input on their experience. It is also designed for members of the public to review climate assessments and provide input to the RGU and EQB staff. The Pilot Program includes opportunities for technical support and learning during the trial period. The sections below describe recruitment strategies for registering RGUs, technical support opportunities, plans for broader communications and engagement, specific input opportunities, and metrics that will be used to evaluate the Pilot Program.

The Pilot Program will be implemented from January through September 2022. Information from the pilot program will be compiled, shared with the Board and the public, and used to inform any final decisions on changes to the EAW form. Final recommendations to the Board will be presented no later than December 2022.

Pilot Program participants and ways to participate

Through the Pilot Program, EQB seeks to involve and get feedback from:

- RGUs who are actively using the draft revised EAW form,
- technical consultants who are providing expertise to the process,
- project proposers who are using the draft revised form, and
- members of the public who are using the EAW form to better understand the potential climate effects of the proposed project.

The table below describes the role and ways to participate for each participant group.

Table 1: Pilot Program participants

Who	Role in the EAW process	Ways to participate in the Pilot Program
Designated State Agencies State agencies identified in Minnesota rules chapter 4410 as a designated RGU, including Commerce, Natural Resources, Pollution Control, Transportation, Public Utilities Commission, and occasionally Agriculture and Health.	Implement the draft revised EAW form.	• Registered participant • Use draft revised EAW form on active projects • Attend both the speaker series and the cohort meetings, as available • Provide feedback to EQB through methods indicated in the metrics
Local Governments Local governments that may be designated as an RGU by Minnesota Rules, chapter 4410, including any general or special purpose local unit of government in the state, including watershed districts organized under Minnesota Statutes, chapter 103D, counties, towns, cities, port authorities, housing authorities, and the Metropolitan Council.	Implement the draft revised EAW form.	• Registered participant on a voluntary basis • Use draft revised EAW on active projects • Attend both the speaker series and the cohort meetings, as available • Provide feedback to EQB through methods indicated in the metrics
Technical consultants Consultants that may be engaged by an RGU and/or a project proposer to prepare draft environmental review documents.	Provides technical services used to complete the draft revised EAW form when hired by project proposers and/or RGUs.	• Registered participant on a voluntary basis • Attend both the speaker series and the cohort meetings, as available • Provide feedback to EQB through methods indicated in the metrics
Project proposers The person or entity that proposes to undertake a project.	Supplies data requested by the RGU reviewing their project as well as considers the results of the assessments for making decisions on project design and mitigation.	• Participate in the EAW processes using the draft revised EAW form, when requested by an RGU • Participate as interested in speaker series

Who	Role in the EAW process	Ways to participate in the Pilot Program
		• Attend SPPI, ERIS and Board meetings when updates on the Pilot Program are discussed • Register to receive email updates • Provide feedback to EQB through methods indicated in the metrics
<u>Members of the public</u> Any members of the public not identified above.	Reviews and comments on the climate information included on the draft revised EAW form during the public comment period.	• Commenting to RGUs during the public comment period on EAWs using the draft revised EAW form • Participate as interested in the speaker series • Attend SPPI, ERIS and Board meetings when updates on the Pilot Program are discussed • Register to receive email updates • Provide feedback to EQB through methods indicated in the metrics

Registered RGUs and technical consultants: recruitment, expectations, and opportunities

Recruitment strategy for registering RGUs

The purpose of the recruitment strategy is to ensure designated state agencies, local governments and consultants are aware of the opportunity to participate in the Pilot Program.

To the best of their ability, EQB hopes to recruit a broad range of RGUs of different sizes, from different areas of the state, and who review different types of projects. Because of the variability among RGUs for the frequency of projects reviewed, Pilot Program registration is open through July 2022 regardless of whether an active project is being reviewed.

The following outreach methods will be used for recruitment:
- *EQB Monitor* notifications
- Targeted emails, networking and phone campaigns for both Metro and Greater Minnesota local governments
- Outreach to past participants in environmental review
- Requests for assistance with notifications through associations that work with local governments
- Contacts from *EQB Monitor* data

Expectations for registered RGUs

- Use the draft revised EAW form whenever feasible
- Support other Pilot Program participants, when possible
- Provide information requested by SPPI about their experiences implementing the draft revised EAW form

Opportunities for engagement for registered RGUs and technical consultants

- Attend the speaker series that will provide an opportunity to dialogue with technical experts and other Environmental Review Program experts.
- Attend cohort meetings designed to facilitate collaboration, assess different approaches (for calculations, boundaries, protocols, etc.) share best practices, learn from one another, and ultimately compile resources in a manner that can facilitate the work of any RGU as they implement the draft revised EAW form.
- The cohort meetings will be limited to registered RGUs and consultants, as they will involve real-time discussions of RGU preparation of the environmental review documents. The environmental review processes that RGUs follow have clearly prescribed mechanisms for public participation and the pilot program is not meant to, and should not, replace those prescribed mechanisms.

Additional opportunities for all program participants

- Attend the speaker series and ask questions.
- Hear progress updates during SPPI, Environmental Review Implementation Subcommittee (ERIS) and Board meetings.
- Join an email distribution list on the EQB's website to receive updates and notifications on the Pilot Program.
- Receive notifications via the *EQB Monitor* newsletter on upcoming meetings, SPPI meetings, ERIS meetings, and Board meetings.
- Visit the EQB webpage for information and updates. EQB staff will be available to attend meetings sponsored by interested organizations that would like to offer feedback on suggested changes to the draft revised EAW form, outside of the opportunities through methods described in the metrics.

Metrics

The purpose of Pilot Program metrics is to establish a foundational basis for Board members and EQB staff to determine effectiveness of climate information and efficiency for providing climate information included in the draft revised EAW form, as well as assessing Pilot Program design. In this context:

- Effectiveness is understood as the EAW form accurately and consistently providing usable climate information to project proposers, RGUs and members of the public.
- Efficiency is understood as the ability of the project proposer to supply any data reasonably requested by the RGU, and for the RGU to comply with the environmental review procedures to provide complete climate data and analyses, in a cost effective and timely manner, relevant to project-specific needs.

The metrics listed in tables below are designed to gather information from all pilot program participants including RGUs, consultants, project proposers, and the public, and provide the information to Board members at the conclusion of the Pilot Program.

Limitations to the metrics

The data set generated through the metrics below will be largely qualitative in nature, and will require interpretation by EQB staff, SPPI members, and the Board as a whole. As with many data sets, information generated from the Pilot Program metrics may not provide complete or unambiguous answers to all questions members of the Board may have about changes to the EAW form.

Nor will it necessarily resolve different underlying viewpoints about the purpose and value of environmental review, since the Pilot Program only evaluates one piece – questions added to the EAW form on carbon footprints and climate trends – of a much larger process. However, the Pilot Program still represents an invaluable opportunity to further study and test the draft revised EAW form and systematically evaluate user experience.

Much discussion during SPPI meetings focused on time and cost as a metric for efficiency. Data on time and cost do not provide insight on effectiveness and they only give us part of the picture on efficiency, so they need to be used in combination with other metrics. In addition, collecting data on time and cost in environmental review presents several challenges. Some challenges with collecting and considering time and cost include:

- The RGU has the authority to determine the type of analyses required on the EAW form, based on the nature or location of the project. Therefore, the time and cost will vary based on the needs of an individual review.
- Larger projects will require more (and smaller projects less) time and cost for all aspects of the EAW, not just the climate-related questions. The amount of time required for a large project may not be a good indicator for a small project, and vice versa.
- Information collected during the limited time of the Pilot Program will likely not reflect long-term time and cost. As practitioners become more experienced with the new climate-related questions and analyses, the time and cost to complete these questions should decrease.
- There is not an established baseline or threshold to compare this type of analysis with any other analysis required on the EAW form, or by assessments by project type.
- People use the information provided on the EAW differently and therefore have different views about what information is needed, and how much time and cost is reasonable for providing that information.
- Because the time and cost will be self-reported with no way to verify the accuracy, and be collected over a limited period, it cannot be used for drawing reliable conclusions. Nonetheless, a key objective of the Pilot Program is to learn from all participants -- in particularly RGUs and project proposers actively working on EAWs – whether time and cost could qualitatively be reduced by clarifying the climate questions, or providing additional guidance and tools.

Table 2: Metrics for assessing Pilot Program design
The following table describes what information will be collected on the effectiveness of the Pilot Program.

	Pilot Program design effectiveness metrics	Source of Information	How information will be considered
1.	The Pilot Program included a cross section of RGU's from State agencies and local governments in Metro and Greater Minnesota.	Pilot Program registration information	The effectiveness of the Pilot Program for providing sufficient information for Board decision making.
2.	The Pilot Program provided meaningful mechanisms to engage Greater Minnesota RGUs who have few staff and are not currently evaluating an EAW.	• Pilot Program registration information • Survey responses	The effectiveness of the Pilot Program for providing sufficient information for Board decision making.
3.	The Pilot Program provided meaningful mechanisms for input and transparency for all interested Environmental Review Program participants.	• Pilot Program registration information • Survey responses	The effectiveness of the Pilot Program for providing sufficient information for Board decision making.

Table 3: Metrics for effectiveness of climate information included on the draft revised EAW form.
The following table describes the what information will be collected on the effectiveness of climate information on the draft revised EAW form; and presented to Board members at the conclusion of the Pilot Program.

	Effectiveness metric	Source of information	Outreach method	Outreach content*	How information will be considered
1.	Responses to all requested climate information were included on the draft revised EAW form.	EQB staff review of projects that use the revised draft EAW form	Interview; randomly selected, based on responses	• Why were the questions not answered? • Could changes be made to add clarity or relevance?	• Should climate questions be amended? If so, how? • What types of additional guidance may be needed?
2.	New climate questions on the EAW form are clear and unambiguous.	• Project Proposer • RGU • Members of the public	• Survey at *EQB Monitor* notice • Survey from RGU to commenters • Survey to email distribution list	Were you able to understand the climate information requested?	Should climate questions be amended? If so, how?
3.	The Project Proposer is able to complete data portions of the EAW and submit to the RGU.	Project Proposer	Survey at *EQB Monitor* notice	Were you able to complete data portions of the EAW and submit to the RGU? Y/N – if N why not?	Are additional tools needed and/or sector specific resources?

	Effectiveness metric	Source of information	Outreach method	Outreach content*	How information will be considered
4.	RGUs are able to assess climate impacts accurately and consistently.	RGU	Survey at *EQB Monitor* notice	Were you able to assess climate impacts accurately and consistently? Y/N – if N why not?	Are additional tools needed and/or sector specific resources?
5.	New climate information helps project proposers, RGUs and members of the public understand potential climate effects from the proposed project.	• Project Proposer • RGU • Members of the public	• Survey at *EQB Monitor* notice • Survey from RGU to commenters • Survey to email distribution list	• Was the climate information usable? Y/N – If no why not? • What changes could be made to add relevance.	Should climate questions be amended? If so, how?

These questions are examples of the types of questions that may be asked in an interview and/or a survey. Specific wording will be developed once the metrics are final.

Table 4: Metrics for efficiency of climate information included on the draft revised EAW form.
The following table describes the what information will be collected on the efficiency for providing of climate information on the draft revised EAW form; and presented to Board members at the conclusion of the Pilot Program.

	Efficiency metric	Source of information	Outreach method	Outreach content*	How information will be considered
1.	The project proposer was able to provide any data reasonably requested by the RGU	• Project Proposer • Consultants	• Survey to project proposer • Survey at *EQB Monitor* notice	• What was the total project cost for preparing the EAW? • What was the total cost for preparing the climate assessment? • Was the project timeline delayed because of the additional climate information? If yes - How long? • Were the climate assessments more complex and time consuming than other similar assessments on the EAW form for this project?	Should climate questions be amended? If so, how?

	Efficiency metric	Source of information	Outreach method	Outreach content*	How information will be considered
2.	The RGU was able to comply with the environmental review procedures in a cost effective and timely manner	RGU	• Survey to RGU • Survey at EQB Monitor notice	• What was the total project cost of the EAW? • What was the cost for preparing the climate assessment? • Was the project timeline delayed because of the additional climate information? • Was the project more, less or the same complexity as other similar projects? • Were the climate assessments more complex and time consuming than other similar assessments on the EAW form for this project?	Should climate questions be amended? If so, how?
3.	Tools provided in Guidance (both Section 1 carbon footprint and Section 2 climate impacts) efficiently support timely responses.	• RGU • Project Proposer	• Survey • Survey at *EQB Monitor* notice	• Are the tools identified in guidance user-friendly; easily understood and applied? • Do the tools identified in guidance provide consistent and accurate information? • Do the tools identified in guidance provide information relative to a specific project?	Are additional tools needed and/or sector specific resources?

*These questions are examples of the types of questions that may be asked in an interview and/or a survey. Specific wording will be developed once the metrics are final