Responsible Government Unit Survey: Results and Analysis

Conducted as part of the
Study of Mandatory Threshold Levels for
Environmental Review

December 6, 2004

Environmental Quality Board
Responsible Government Unit Survey Survey: Results and Analysis

Background 1
Survey Methodology 1
Background of Respondents 1
Survey Results 3
Next Steps 11
Appendix A: Survey Materials 12
Appendix B: Residential Survey 22
Appendix C: Aggregate Survey Results 31
Appendix D: Industrial/Commercial/Institutional Survey 37
Appendix E: Nonmetallic Mineral Mining Survey 44
Appendix F: Land Use Conversion Survey 51
Appendix G: Highway Survey 58
Appendix H: Mixed Commercial/Residential Survey 65
Appendix I: Historical Survey 71
Appendix J: Comparing Categories 77
Appendix K: DNR Database Information 80

Environmental Quality Board Study of Mandatory Threshold Levels for Environmental Review

RESULTS OF RESPONSIBLE GOVERNMENT UNIT SURVEY

Background Information

The Environmental Quality Board commissioned a study in January 2004 to examine mandatory thresholds for environmental review in Minnesota. Mandatory thresholds are found in MN Rule 4410.4300 and have been established for 36 different types of projects. If a project's size is above the threshold for its category, then environmental review is mandatory. This is how most projects enter the environmental review process.

While many efforts have been made in the past to improve the environmental review program, none have concentrated on evaluating the mandatory threshold levels. Consequently, the overall intent of the Mandatory Threshold Study was to determine whether the program was reasonably meeting its environment and natural resource goals, and doing so in a way that balanced administrative burden and public benefit. In other words, it was important to identify whether the mandatory thresholds were at the correct levels. This study would involve collecting information from both state agencies and local government units.

Early on in the Mandatory Threshold Study, though, staff struggled with how to get information from local responsible government units (RGUs) who prepare some environmental review documents. Through discussions with several city/county planners and staff members, it appeared too difficult for local governments to gather detailed project information from their files. This group suggested that a survey might be the best method of collecting data from this stakeholder group.

Survey Methodology

An RGU survey seemed like a useful information-gathering tool and a survey was developed during the ensuing two-month time period. It was designed to collect three types of information: process information (ex.: the length of time it takes to complete environmental review); information on the perceptions/opinions about the mandatory thresholds; and information on the costs and benefits of the environmental review process for local governments.

Copies of the draft survey were distributed to a small group of environmental review administrators in local governments and comments received from this pilot test were adapted into the survey questions.

Every effort was made to inform participants about the survey and encourage their response. Names and addresses were gathered from the EQB Monitor and included anyone listed as the RGU contact for an EAW during the years 2000 through 2003. Two weeks prior to mailing the survey, a pre-survey letter was sent to participants notifying them of the upcoming mailing and to provide them with some background information about the Mandatory Threshold Study. Two weeks after the survey was sent out, a follow-up postcard was mailed to non-responding participants reminding them of the submission deadline. Please see Appendix A for copies of all the survey documents.

Background of the respondents

A total of 191 surveys were sent out and 68 surveys were received back. Out of these 68 responses, three were received too far after the cut-off date to be counted in the final results, and four surveys were not included because the respondent had not worked on an EAW in the

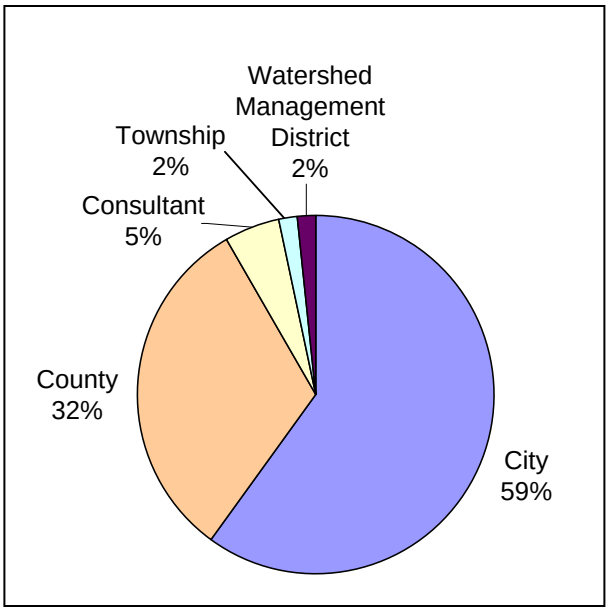
last 10 years. This brought the final adjusted response rate to 32 % — a percentage considered "good" for a mailed survey of this type.

In the survey, respondents had the opportunity to report information on up to three different types of environmental review projects, depending upon the categories their organization had experienced the most activity in from 2000 through 2003. As a result of this flexible format some respondents commented on three categories and some commented on only one. The final numbers were as follows: 35 respondents commented on three categories of projects, 12 respondents commented on two categories, and five respondents commented on only one. This brought the total number of categorical responses to 117.

From the 117 total categorical responses, the most frequent categories receiving comments were the residential category with 42 responses and the industrial/commercial category with 21 responses. Other categories with a significant number of responses were the non-metallic mineral mining category with 13 responses, the land-use conversion category with 12 responses, the highways category with nine responses, the mixed/commercial residential category with nine responses, and the historical category with six responses. These eight categories represented approximately 95% of the EAWs performed by local government units during 2000 through 2003, based on records gathered from the DNR's project-tracking database (please see Appendix K for a summary of the database results). There were so few responses for the marina, feedlot, campground, sports facility, and communication tower categories that the results for these projects were not considered in the survey analysis.

The responding organizations represented an adequate distribution of RGU types, as 36 respondents were from cities, 19 were from counties, and three were from consulting firms. There was also one response from a township and one response from a watershed management district (see Figure 1).

Figure 1: Respondents' RGU types



It was possible to divide the city survey respondents even further, grouping them into classes based on their population size. Using the Minnesota Legislature's designation of class types, the breakdown was as follows: four respondents were from cities of the first class, 14 were from cities of the second class, six were from cities of the third class, and 12 were from cities of the fourth class (see Table 1 for a description of the city classification system).

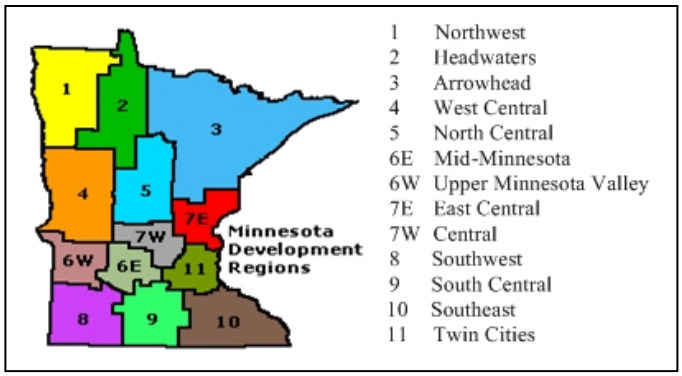
Table 1: Classification of cities by population

City Classification	Population Size
City of the 1st Class	> 100,000
City of the 2nd Class	20,001 - 100,000
City of the 3rd Class	10,000 - 20,000
City of the 4th Class	< 10,000

Since some cities and counties could have had two or more environmental review staff in their organizations, it was possible to receive multiple responses from the same RGU.

Survey respondents were almost entirely from the twenty-five county growth corridor that stretches from St. Cloud to Rochester, with the greatest number of respondents from in the Twin Cities and Central regions. Only a few surveys were received from RGUs in the Headwaters, E. Central, Mid-Minnesota and Southwest regions; and no surveys were received from RGUs in the Northwest, Upper Minnesota Valley, and South Central Regions. This information is likely a reflection of the number of EAWs that were completed in these regions in recent years, not an indifference to the survey.

Figure 2: Name and location of Minnesota regions



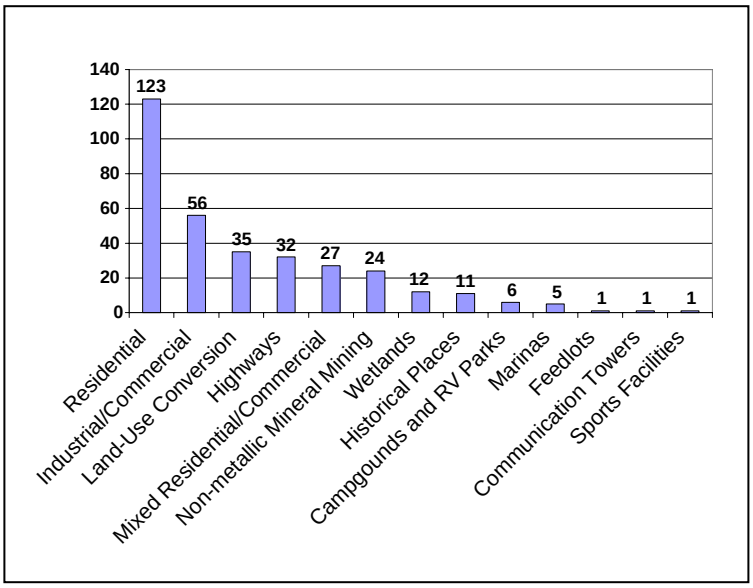
The average number of EAWs respondents had worked with in the last ten years was actually quite high at 6.42, suggesting respondents were relatively familiar with the environmental review process. Responses to this question ranged from 1 to 50, with the higher numbers being reported by environmental consultants. Since responses to this question were somewhat skewed to the right, a trimmed average was reported to more accurately reflect the experience level of respondents.

Survey Results

Aggregated Results from All Categories

One of the first questions in the survey concerned the number of EAWs responding organizations had completed in each category during the years 2000 through 2003. Based on this information, responding organizations were responsible for a total of 334 EAWs in the four-year period, with the breakdown by category shown in Figure 3.

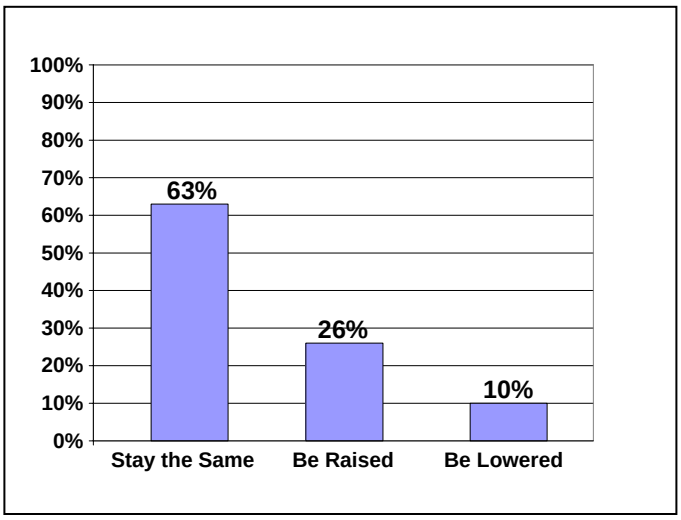
Figure 3: Number and type of projects completed by responding organizations



In the survey, participants responded to questions according to specific project categories, that is, they did not answer questions evaluating the effectiveness of environmental review as a whole. Nonetheless, it's possible to combine the data from these different categories and get a general understanding of how well environmental review is working, especially for project categories representing a majority of EAW activity in the last few years.

When reviewing the overall threshold recommendations, a majority of respondents proposed leaving the mandatory thresholds the same. This suggests a majority of respondents feel the standards work well, and that there is no great need for a change in the threshold levels. If respondents did recommend making a change, however, they were most often suggesting an increase in the current mandatory thresholds (see Figure 4).

Figure 4: Recommendations for the mandatory thresholds from all of the categories combined



Using statistical tests to evaluate the significance of respondent answers, there is strong evidence suggesting respondents viewed environmental review positively. They agreed with the statements, "the EAW is a good communication tool to help the public understand the scope of the project," and "the EAW is important because it addresses broader quality of life issues." They also agreed with the statement, "because of the EAW process, government agencies with permitting responsibilities make better decisions," and "the overall benefit outweighs the monetary cost of preparing an EAW."

The overall response varied greatly for the other questions, including, "the EAW is a cost effective way to help the project proposer develop a final project design," and "environmental review today is often duplicative of other state and local permitting and approvals." There was also a varied response to the statement "project proposers frequently design projects just under the EAW thresholds."

There are likely two reasons for why the overall response varied to these questions. First, the respondents may have experienced differing problems and/or benefits with environmental review that influenced their answers. Depending upon the level of permitting or land-use planning in their communities, environmental review may have been very duplicative for some respondents and not for others.

Secondly, the overall variability to these questions could have resulted from aggregating the result from all categories. For example, there may have been categories in which respondents indicated a strong agreement to the statement, and other categories in which the respondents had a strong disagreement to the same statement.

The survey also asked for length-of-process information, asking respondents to record the approximate number of weeks it took them to process an EAW in each category, from the time they received data from the proposers to the time a decision was made on the need for an EIS. When reviewing the information for different types of projects, it was not possible to identify one category that took significantly longer than the others — the average was about 10.1 weeks. It's possible there were indeed differences between the categories; however these differences could not be identified because of the small survey sample and the inherent variability in the environmental review process.

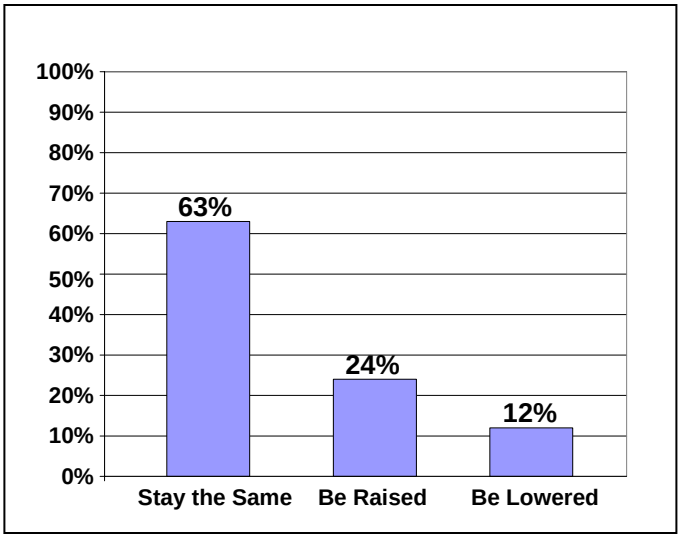
Results from the Residential Category

The residential category was the most frequently reviewed of all categories, with a total of 42 respondents. When tabulating the respondents' background information, it was discovered the information for the residential category closely resembled that of the aggregated survey results. For this category, 61% of the respondents were from cities, 28% were from counties, 7% were from consulting agencies, and 2% were from townships. On average, responding organizations had performed 3.25 residential EAWs during the four-year period of this study.

When reviewing the overall recommendations, a majority of respondents recommended leaving the mandatory thresholds the same. This suggests that a majority of respondents feel the standards work well, and that there is not a great

need for a change in the threshold levels. If respondents did recommend making a change, however, they were most often suggesting an increase in the current mandatory threshold levels.

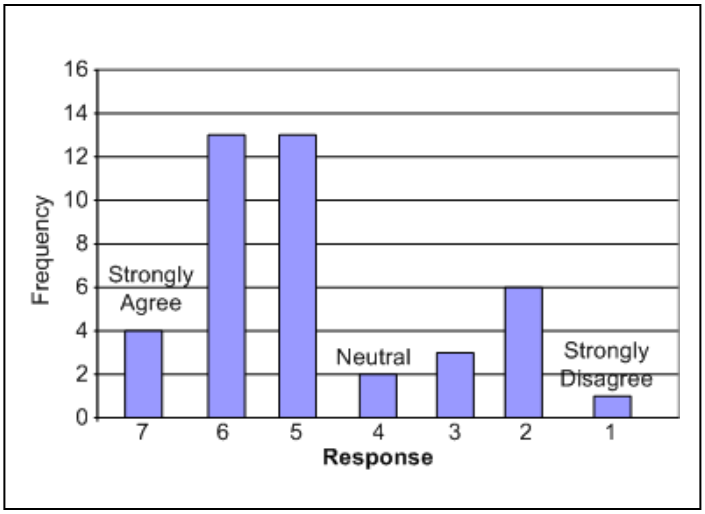
Figure 5: Recommendations for the mandatory EAW threshold in the residential category



It is important to note, however, respondents for this category were found commenting on two different types of projects: residential projects triggering an EAW for the number of units in a new development, and residential projects triggering an EAW for the land-use conversion threshold of 80 acres. It should be noted that not a single county RGU, those likely facing a threshold based on acreage, recommended an increase in the residential threshold levels.

Respondents for the residential category frequently viewed environmental review as a beneficial process, responding positively to the statements, "the EAW is important because it addresses broader quality of life issues," and "because of the EAW process, government agencies with permitting responsibilities make better decisions." They also agreed with the statement, "the overall benefit outweighs the monetary cost of preparing an EAW."

Figure 6: Responses to the statement "because of the EAW process (for residential projects), government agencies with permitting responsibilities make better decisions"



Residential projects were one of three categories where a majority of respondents indicated, "project proposers frequently design projects just under the EAW thresholds," with 56% of respondents agreeing with the statement and 39% disagreeing with it. This split may suggest there are some proposers attempting to avoid environmental review, but at only 56% it is not an overly pervasive problem.

Responses to the statements, "the EAW is a cost effective way to help the project proposer develop a final project design," and "environmental review today is often duplicative of other state and local permitting and approvals," were varied, as were responses to the statement, "the EAW is a good communication tool to help the public understand the scope of the project."

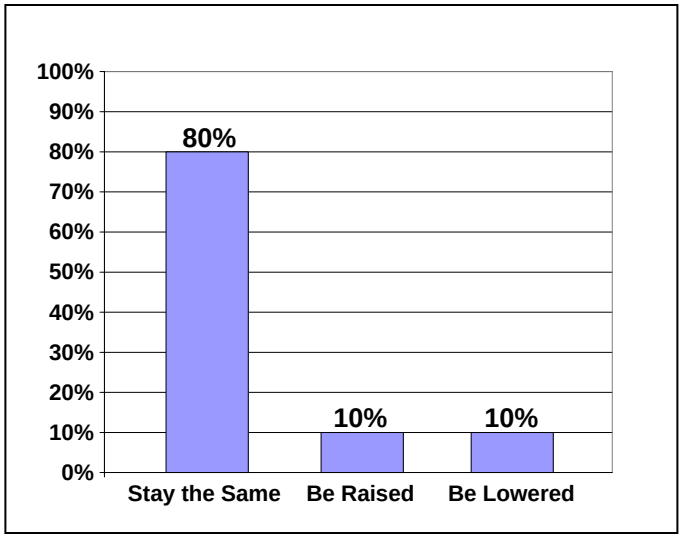
Results from the Industrial/Commercial/ Institutional Category

There were a total of 21 respondents commenting on the industrial/commercial category, in which 90% of them were from city RGUs. A majority of responding organizations were also from the Twin Cities region. On average, responding organizations had performed

2.6 industrial/commercial EAWs during the four-year period of this study.

A significant majority of respondents recommended leaving the threshold levels alone for this category, which suggests most respondents think the thresholds work well. Other responses were equally split between raising the threshold and lowering it (see Figure 7).

Figure 7: Recommendations for the mandatory EAW threshold in the industrial/commercial category



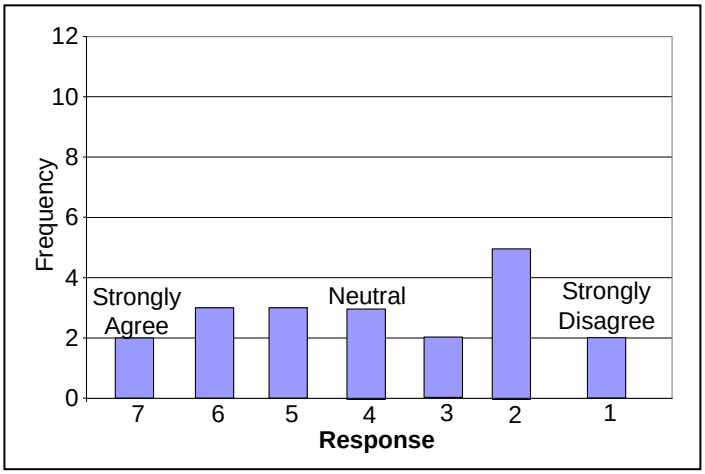
One respondent, suggesting a change in how the mandatory threshold was measured, commented:

"Waste strength and volume should be a trigger. Acre ft of stormwater should be a trigger. Reflective and stray light should be a trigger."

Respondents for this category responded positively to the statements, "because of the EAW process for this category, government agencies with permitting responsibilities make better decisions," and "the overall benefit outweighs the monetary cost of preparing an EAW for this category." There is also some evidence they responded positively to the statement "the EAW for this category is a good communication tool for the proposer to help the public understand the scope of the project."

Respondents appeared split on the other statements, however, including, "the EAW is important because it addresses broader quality of life issues," and "project proposers frequently design projects just under the EAW thresholds." They also appeared split to the statements, "the EAW is a cost-effective way to help the project proposer develop a final project design," and "environmental review today is often duplicative of other state and local permitting and approvals."

Figure 8: Responses to the statement "environmental review today is often duplicative of other state and local permitting and approvals (for the industrial/commercial category)"



Results from the Non-Metallic Mineral Mining Category

There were a total of 13 respondents for the non-metallic mineral mining category, of which 38% were from cities and 62% were from counties. Respondents prepared an average of 1.27 EAWs for this category during the period of study.

The non-metallic mineral mining category was one of the categories in which there appeared to be a strong argument for changing the mandatory threshold level. One reason was that out of all of the categories, non-metallic mineral mining had the largest percentage of recommendations for a lower threshold and the smallest percentage of

recommendations for a higher one. That is, 38% of the respondents recommended lowering the mandatory threshold, 54% recommended leaving it the same and only 8% recommended raising the threshold (see Table 2).

There also appeared to be a correlation in the respondents' RGU type and their recommendation. It was observed that while 100% of the city respondents recommended leaving the threshold the same, 62% of county respondents recommended lowering the threshold. This difference should be taken into consideration when evaluating the recommendation results.

Respondents provided the following rationale for their recommendations:

Responses for lowering the threshold:

- Mining, especially with asphalt plant and crusher, causes considerable disruption to traffic flows in the area. Noise and odor also is a problem not to mention dust. The hydrocarbon discharge from the plant is a concern, since the long term effect is unknown.
- Connected actions of some parties are not always reviewed — 40 acres is a lot of land to mine.
- I believe this type of development/impact has a greater effect on the environment and the surrounding area.
- I think there needs to be an acre/foot figure. At present it is 40 acres with a mean depth of 10 feet. What about 39 acres at 20 feet deep? An acre/foot figure needs to be locked in.
- These projects are of such impact on area residents, if there is some initial mitigation, things go much smoother.

Responses for leaving the threshold the same:

- Forty acres has shown to be a good threshold for the size of operations we have.
- Seems adequate.
- We already have public hearing requirements.
- Often times the thresholds seem to be high — but the RGU has the option of ordering a discretionary.

Responses for raising the threshold:

- All gravel pits go through much zoning and much public review. Great controversy is not necessarily addressed by the mandatory EAW threshold. People always have the option of a petition.

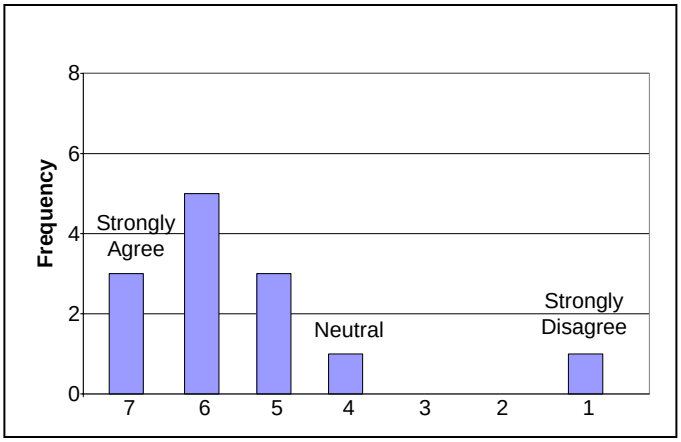
There was also an overwhelmingly positive response to the costs/benefit statements in the survey for this category. In general respondents believed the EAW process was beneficial for

Table 2: Summary of recommendations from all categories — the non-metallic mineral mining results highlighted

	All Categories	Residential	Industrial	Mining	Land-Use	Highways	Mixed	Historic
Percentage of respondents recommending the threshold should **"Be Lowered"**	10	12	10	38	0	0	0	0
Percentage of respondents recommending the threshold should **"Stay the Same"**	63	63	80	54	75	66	67	0
Percentage of respondents recommending the threshold should **"Be Raised"**	26	24	10	8	25	33	33	100

their communities, responding positively to the statements, “the EAW is a good communication tool to help the public understand the scope of the project,” and “the EAW is important because it addresses broader quality of life issues.” They also agreed with the statements, “because of the EAW process, government agencies with permitting responsibilities make better decisions,” and “the overall benefit outweighs the monetary cost of preparing an EAW.”

Figure 9: Responses to the statement “the overall benefit outweighs the monetary cost of preparing an EAW (for the non-metallic mineral mining category)”



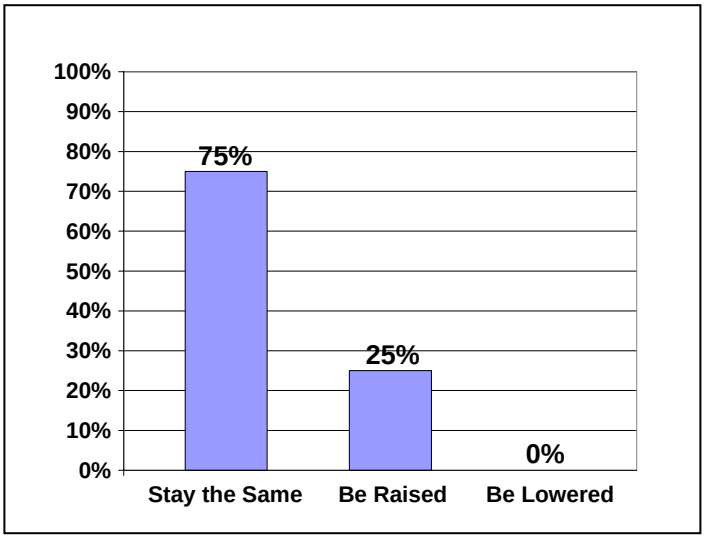
Another interesting result was that 73% of respondents agreed with the statement, "project proposers frequently design projects just under the EAW thresholds.” This suggests that there may be a large number of non-metallic mineral mining proposers attempting avoiding environmental review, but for which the EAW process would be beneficial.

Results from the Land-Use Conversion Category

As previously mentioned, there appeared to be some overlap between the residential category and the land-use conversion category, but there were 12 respondents that specifically commented on the category called land-use conversion. Five of the respondents were from cities, six were from counties, and one was a consultant. On average responding organizations completed 1.8 EAWs in the land-use conversion category during the years 2000 through 2003.

Seventy-five percent of the respondents recommended leaving the threshold the same, 25% recommended raising the threshold, and no one recommended lowering the threshold (see figure 10). This suggests there was not a great need for change in this mandatory category. It is important to note that there was again a correlation between the RGU type and their recommendation — none of the counties recommended raising the threshold while several cities and the consultant did make that recommendation.

Figure 10: Recommendations for the mandatory EAW threshold in the land-use conversion category



Respondents appeared to be split on how they viewed the EAW process for this category; there was not a single statement for with which a significant majority of respondents agreed or disagreed.

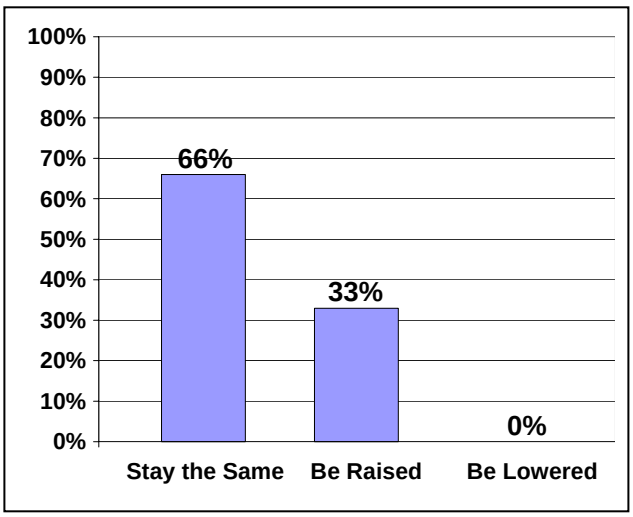
This may have been the result of the differing city/county zoning regulations respondents followed, making the EAW process more or less valuable for certain communities or it could be due to the end-result of the land-use conversion. There may be certain projects for which the EAW process yielded important information

about environmental impacts, or there may have been different types of land involved in the conversion (example: forest conversion vs. farmland conversion).

Results from the Highway Category
There were a total of nine respondents for the highway category, three from cities, four from counties, and two were consultants. Three respondents were from the Twin Cities region, two from the Arrowhead region, and two were from the North Central region. On average, responding organizations completed 1.1 EAWs in the highway category during the four year period of this study.

Sixty-six percent of respondents recommended leaving the threshold the same for this category and 33% recommended raising the threshold. No one suggested lowering the mandatory threshold for highway projects.

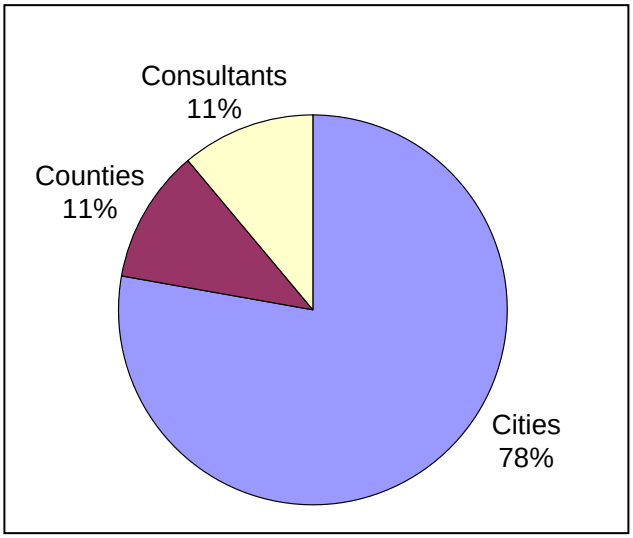
Figure 11: Recommendations for the mandatory EAW threshold in the highway category



Respondents were split on all but one of the statements on the survey, disagreeing with the statement "project proposers frequently design projects just under the EAW thresholds." This seems to make sense, since most highway projects are determined by the amount, or projected amount, of traffic for a given area. Few cities and counties would be willing to change highway designs and lengths simply to avoid environmental review.

Results from the Mixed Residential/Commercial Category
There were nine respondents for the mixed commercial/residential category, seven from cities, one from a county, and one consultant. A majority of city RGU respondents were from cities of the second class, and most of the respondents were from the Twin Cities region. On average, responding organizations completed 4.2 EAWs in the mixed residential/commercial category during the four year period of this study.

Figure 12: Respondents' RGU types for the mixed residential/commercial category

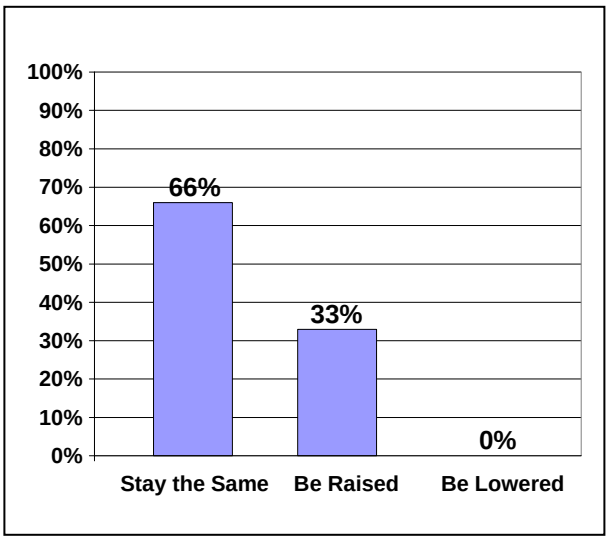


Sixty-six percent of respondents recommended leaving the threshold the same for this category and 33% recommended raising the threshold. No one suggested lowering the mandatory threshold for mixed residential/commercial projects. When making a suggestion for an increased threshold level, the respondents only appeared interested in increasing the residential component of the threshold calculation.

Respondents were split to all of the statements on the survey. It appears some respondents had

a positive experience with the EAW process for this category while others did not.

Figure 13: Recommendations for the mandatory EAW threshold in the mixed residential/commercial category



Results from the Historical Places Category
There were a total of six respondents for the historical places category, five from cities and one from a county. While this number may seem low, these individuals had been responsible for a total of eight EAWs in the historical category, during a time in which only 10 EAWs total were performed in the state. This indicates a very good response rate of 80%. A majority of the city RGU respondents were from Minneapolis or St. Paul. On average, responding organizations completed 1.6 EAWs in the historical places category from 2000 through 2003.

There was a very strong indication that respondents felt the mandatory threshold for this category should be revised or eliminated – 100% of them agreed with this recommendation. A majority of respondents also reacted negatively to the statements, "the EAW is a good communication tool to help the public understand the scope of the project," and "the EAW is important because it addresses broader quality of life issues." They disagreed with statements such as, "because of the EAW process, government agencies with permitting responsibilities make better decisions," and "the overall benefit outweighs the monetary cost of preparing an EAW." They also disagreed with the statement, "the EAW is a cost effective way to help the project proposer develop a final project design." They agreed with the statement "environmental review today is often duplicative of other state and local permitting and approvals."

Since the threshold applies to properties listed on the National Register of Historic Places or State Register of Historic Places, it made sense respondents would also disagree with the statement, "project proposers frequently design projects just under the EAW thresholds." It is nearly impossible for proposers to design a project to fall below the mandatory threshold level for this category.

Respondents provided some of the following reasons for changing the threshold for historical places:

"A non-contributing property in a historic district should not require review."

"Stone arch bridges that are less than 100 feet in length, unless they have some historical significance, other than their age, should not be considered for acceptance on the National Register. A small (20') stone arch railroad bridge crossing an intermittent stream should be considered the same as the Stone Arch Bridge crossing the Mississippi River by the St. Anthony Falls in Downtown Mpls. OR if they are eligible to be listed, then they should be ranked/rated as to public value, uniqueness, etc. and given a monetary values ($20,000, etc.)."

"I believe this category should be discretionary, both for structures within an historic district and individually listed structures because most of the EAW questions are not applicable to this situation. For cities with a heritage preservation commission, there is adequate oversight."

"The RGU should have more discretion on a case-by-case basis. Remodeling a single family home, for example, should not require an EAW."

"Discretionary for non-contributing buildings within a district. In fact, EAW not appropriate process to do historic impacts."

Next Steps

Based on the information from these surveys, it appears there is not a huge indication of a need to change the thresholds in many categories. In the residential, industrial, land-use conversion, and mixed commercial/residential categories, approximately 2/3 to 3/4 of the respondents recommended leaving the thresholds the same. Perhaps, due to the large number of environmental review projects in the residential category, it would be prudent to perform some additional analysis of the thresholds by gathering information from project proposers and citizens.

The two categories where there was sufficient interest in changing the thresholds were the non-metallic mineral mining and historical categories. For the non-metallic mineral mining category, it appeared respondents believed the EAW process to be useful and beneficial in evaluating impacts and informing decision makers. Additional information should be gathered to evaluate whether in makes sense to lower the threshold or convert the metric used to a standard volume measurement. In the case of the historical category, it seems very clear that respondents do not feel the process is beneficial and would like to see it either altered or eliminated.

Appendix A
SURVEY MATERIALS

April 28, 2004

Dear [Participant]:

I am writing to inform you about an important study the Environmental Quality Board will be launching within the next month.

We will be conducting a survey of local government units to gather people's thoughts and opinions regarding the current mandatory category threshold levels for environmental review. The results of this survey will help us determine if the threshold levels should remain the same or be changed.

You were selected to participate because you were listed as a contact person for an Environmental Assessment Worksheet prepared within the last 4 years. Your thoughts and opinions could benefit Minnesotans by ensuring the environmental review process reasonably balances public benefit with adminstrative burden. The survey will be mailed to you in the next few weeks and should take approximately 20 minutes to complete.

If you have had little experience preparing EAWs in the past and have been selected in error, please call the staff listed below and let us know, or give this survey to someone in your organization who has prepared an EAW before.

Feel free to contact either Jon Larsen (651/296-8253) or Gregg Downing (651/205-4660) with any other questions or comments you may have by phone or by email at environmental.review@state.mn.us

Sincerely,

Michael Sullivan, Executive Director
Environmental Quality Board

May 6, 2004

Dear [Participant],

You have been selected to participate in a survey regarding the Mandatory Thresholds Levels for Environmental Review. Hopefully, you received a letter notifying you of this survey about two weeks ago.

The Environmental Quality Board (EQB) is conducting a review of various mandatory categories and their thresholds. As part of this review, EQB is surveying staff members of city and county RGUs to obtain their perspectives on the issue. Information gathered will be analyzed and used to inform EQB members about whether certain thresholds need to be modified.

Your participation in this survey is critically important to obtaining an accurate picture of our current thresholds. It should take you about 20 to 30 minutes to complete it. Feel free to make additional copies and give them to your coworkers if there is more than one individual who works with EAWs in your workplace, and then return the surveys together. If you do not work with EAWs, and you know of someone who does, please pass this survey along to them. Please return the survey(s) within 10 working days of receipt.

If you have any additional questions or concerns, please feel free to contact either Jon Larsen (651/296-8253) or Gregg Downing (651/205-4660) or by email at environmental.review@state.mn.us

We anticipate that the compiled information from this survey will be posted at the EQB website (www.eqb.state.mn.us) by July 15, 2004. In addition, we will notify you of any final actions taken by the EQB as a result of this study.

We thank you in advance for your participation and cooperation.

Sincerely,

Enclosure

EQB SURVEY OF LOCAL GOVERNMENTS ABOUT MANDATORY EAW CATEGORIES

Name:_____
(*Note: Information from this survey will be used in aggregated form only; individual responses to the survey will not be released.*)

County/City/Township:_____

Number of EAWs you have been involved with preparing in the past 10 years:_____

Please estimate the number of EAWs YOUR ORGANIZATION has been responsible for preparing, in the years from 2000 through 2003, from the following categories:
(If you need to refer to the wording of the categories, you can consult the *Guide to the Minnesota Environmental Rules* document (beginning at page 18) under Guidance Documents at the EQB website: www.eqb.state.mn.us/review.html)

Residential Developments ____
(4410.4300, subp. 19)

Industrial, Commercial, and Institutional Facilities ____
(4410.4300, subp. 14)

Land Use Conversion, Including Golf Courses ____
(4410.4300, subpart 36)

Mixed Residential and Industrial-Commercial Projects ____
(4410.4300, subpart 32)

Nonmetallic Mineral Mining ____
(4410.4300, subpart 12)

Highway Projects ____
(4410.4300, subpart 22)

Wetland and Protected Waters ____
(4410.4300, subpart 24)

Animal Feedlots ____
(4410.4300, subpart 29)

Historical Places ____
(4410.4300, subpart 31)

Campgrounds and RV Parks ____
(4410.4300, subpart 20)

Marinas ____
(4410.4300, subpart 25)

Communication Towers ____
(4410.4300, subpart 33)

Sports and Entertainment Facilities ____
(4410.4300, subpart 34)

Other ?_____ ____

Please write in the top 3 categories (that the most activity occurred in, in order from highest to lowest) FOR YOUR ORGANIZATION in the spaces below:

Category A _____

Category B _____

Category C _____

For Category A (from page 1)

1) From page 1, what mandatory category did you write down for your Category A?

_____

2) On average, how long does it take YOUR ORGANIZATION to process an EAW for Category A? ("Process" means from the time you receive the complete data portions from the proposer, to the time a decision is made on the need for an environmental impact statement.)

_____weeks

3) In your opinion, the EAW thresholds for Category A should:

__ Stay the same
__ Be lowered
(potentially capturing more projects into environmental review)
__ Be raised
(potentially allowing more projects out of environmental review)

4) a) Please provide the rationale for your answer to question 3.

b) If you believe the thresholds should be raised or lowered, what is your best estimate of an improved threshold number, and why?

How well do you agree with the following statements, with regard to Category A?

5) The EAW for Category A is a good communication tool for the proposer to help the public understand the scope of the project.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

6) The EAW for Category A is a cost-effective way to help the proposer develop a final project design that eliminates or reduces future problems.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

7) The EAW for Category A is important because it addresses broader "quality of life" issues (such as odor, noise, traffic, wildlife, etc.) that are not addressed through permitting processes.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

8) Because of the EAW process for category A, governmental agencies with permitting responsibilities over the project make better and more informed decisions about the project.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

9) Environmental review today for Category A is often duplicative of other state and local government permitting and approvals.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

10) Project proposers frequently design projects just under the EAW thresholds to avoid environmental review for Category A.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

11) The overall benefit outweighs the monetary costs of preparing an EAW for Category A.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

For Category B (from page 1)

If you only had EAWs in one category on page 1, please skip to the questions on the last page of the survey.

1) From page 1, what mandatory category did you write down for your Category B?

_____

2) On average, how long does it take YOUR ORGANIZATION to process an EAW for Category B? ("Process" means from the time you receive the complete data portions from the proposer, to the time a decision is made on the need for an environmental impact statement.)

_____weeks

3) In your opinion the EAW thresholds for Category B should:

__ Stay the same
__ Be lowered
(potentially capturing more projects into environmental review)
__ Be raised
(potentially allowing more projects out of environmental review)

4) a) Please provide your rationale for your answer to question 3.

b) If you believe the thresholds should be raised or lowered, what is your best estimate of an improved threshold number, and why?

How well do you agree with the following statements, with regard to Category B?

5) The EAW for Category B is a good communication tool for the proposer to help the public understand the scope of the project.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

6) The EAW for Category B is a cost-effective way to help the proposer develop a final project design that eliminates or reduces future problems.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

7) The EAW for Category B is important because it addresses broader "quality of life" issues (such as odor, noise, traffic, wildlife, etc.) that are not addressed through permitting processes.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

8) Because of the EAW process for category B, governmental agencies with permitting responsibilities over the project make better and more informed decisions about the project.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

9) Environmental review today for Category B is often duplicative of other state and local government permitting and approvals.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

10) Project proposers frequently design projects under the EAW thresholds to avoid time delays associated with environmental review for Category B.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

11) The overall benefit outweighs the monetary costs of preparing an EAW for Category B.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

For Category C (from page 1)

If you only had EAWs in two categories on page 1, please skip to the questions on the last page of the survey.

1) From page 1, what mandatory category did you write down for your Category C?

_____

2) On average, how long does it take YOUR ORGANIZATION to process an EAW for Category C? ("Process" means from the time you receive the complete data portions from the proposer, to the time a decision is made on the need for an environmental impact statement.)

_____weeks

3) In your opinion the EAW thresholds for Category C should:

__ Stay the same
__ Be lowered
(potentially capturing more projects into environmental review)
__ Be raised
(potentially allowing more projects out of environmental review)

4) a) Please provide your rationale for your answer to question 3.

b) If you believe the thresholds should be raised or lowered, what is your best estimate of an improved threshold number?

How well do you agree with the following statements, with regard to Category C?

5) The EAW for Category C is a good communication tool for the proposer to help the public understand the scope of the project.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

6) The EAW for Category C is a cost-effective way to help the proposer develop a final project design that eliminates or reduces future problems.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

7) The EAW for Category C is important because it addresses broader "quality of life" issues (such as odor, noise, traffic, wildlife, etc.) that are not addressed through permitting processes.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

8) Because of the EAW process for category C, governmental agencies with permitting responsibilities over the project make better and more informed decisions about the project.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

9) Environmental review today for Category C is often duplicative of other state and local government permitting and approvals.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

10) Project proposers frequently design projects under the EAW thresholds to avoid time delays associated with environmental review for Category C.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

11) The overall benefit outweighs the monetary costs of preparing an EAW for Category C.

Strongly Agree			Neutral			Strongly Disagree	Don't Know
7☐	6☐	5☐	4☐	3☐	2☐	1☐	☐

Additional Questions

I. Are there projects for which no environmental review category exists, but that you would like to see go through environmental review? If so, please list and explain why.

II. Is there an existing mandatory category that should be eliminated? If so, please list and explain why.

III. Are there existing categories in which the current environmental assessment worksheet does not address an important environmental impact? If so, please list and explain why.

IV. Is there a mandatory category type in the rules that should be clarified to make it easier to interpret?
   a. Category:
   b. Clarification needed:

V. Is there anything else you want to tell us about the environmental review mandatory category thresholds or other aspects of the environmental review program?

Would you be willing to take part in a follow-up phone survey that would ask more in-depth questions about the categories you selected or issues you may have raised? If so, please provide us with your phone number and the best day/hours best to reach you.

i. Phone Number: _____

ii. Day/Hours: _____

Thank you for your participation and cooperation.

Appendix B
RESIDENTIAL SURVEY RESULTS

42 Respondents Total

Background of the Respondents

RGU type:	26	Cities	(4 from cities of the 1st class, 9 from cities of the 2nd class, 4 from cities of the 3rd class, 7 from cities of the 4th class)
	12	Counties	
	3	Consultants	
	1	Township	

Region:	13	from the Twin Cities Region	10	from the Central Region
	5	from the West Central Region	5	from the Southeast Region
	3	from the Arrowhead Region	2	from the North Central Region
	1	from the East Central Region		

County:	4	from Dakota County	4	from Benton County
	3	from Sherburne County	3	from Ramsey County
	3	from Hennepin County	2	from Douglas County
	2	from Crow Wing County	2	from Stearns County
	2	from Wabasha County	2	from Washington County
	1	from Wright County	1	from Scott County
	1	from Otter Tail County	1	from Olmstead County
	1	from Mower County	1	from Morrison County
	1	from Koochiching County	1	from Itasca County
	1	from Isanti County	1	from Goodhue County
	1	from Becker County	1	from Aitkin County

Responses to Survey Questions

How many EAWs have you been involved with preparing in the last 10 years?

Responses:	42		
Average:	7.05*	Minimum:	1
Standard Deviation:	8.82	Maximum:	50

** Due to the presence of outliers, a trimmed average was used to more accurately represent the experience of the respondents.*

What is the number of EAWs your organization has been responsible for preparing in the Residential category during the years 2000-2003.

Responses:	39		
Average:	3.25*	Minimum:	1
Standard Deviation:	2.48	Maximum:	10

** Due to the presence of outliers, a trimmed average was used to more accurately represent the number of Residential EAWs prepared by responding organizations.*

What is the number of EAWs your organization has been responsible for preparing in the all categories during the years 2000-2003.

Responses:	42		
Average:	6.57*	Minimum:	1
Standard Deviation:	5.75	Maximum:	32

** Due to the presence of outliers, a trimmed average was used to more accurately represent the total number of EAWs prepared by responding organizations.*

On average, how many weeks does it take your organization to process an EAW for the Residential category? ("Process means from the time you receive the complete data portions from the proposer, to the time a decision is made on the need for an environmental impact statement.)

Responses:	40		
Average:	9.7	Minimum:	6*
Standard Deviation:	3.2	Maximum:	18

** There were several responses of 4 weeks or less. Since the minimum amount of time to process an EAW includes a 4 week public comment period, we assumed the respondents*

misinterpreted the word "process". For every response that was 4 weeks or less, an additional 4 weeks was added to make it consistent with the other responses.

In your opinion, the EAW thresholds for the Residential Category should:

Choice	Count	Percentage Answered
Be lowered	5	12%
Stay the same	26	63%
Be raised	10	24%

What is the rationale for your recommendation?

Responses for lowering the threshold:

- Lower the requirement to 70 acres. Many parcels contain just under the 80 requirement and are therefore, not mandatory.
- The majority of EAW's from this area are for development within shore land - most with actual lake frontage. Many developers attempt to stay under the thresholds, and most often do. We, as the RGU, are then bombarded with requests for discretionary EAW's and requests for help and guidance with the citizens petition process. If the petition is submitted properly, we end up doing an EAW anyway.
- All our EAW's were not mandatory but were by petition.
- To read the residential threshold level in metro area requires about an 80 acre project. But much smaller projects also generate environmental impact questions from neighbors and interested parties. Without an EAW, answers to these questions are sometimes unsatisfactory.
- Residential development has the long term effect on the environment and community services. Additional people usually are environmentally detrimental to start with.
- The fifty or more unattached might be a little high.

Responses for leaving the threshold the same:

- The idea of connected projects should be addressed. Maybe if a city/county has exceeded a threshold within a given geographic boundary - then review should occur – using the AUAR comes to mind. Projects are done by landowner and the city often chooses not to connect the actions.
- As far as [our city] is concerned, the current process has adequately addressed the big housing developments that have raised environmental concerns.
- The EAW needs to be strict, to maintain quality of life.
- Seems like an appropriate number.
- From our perspective, the thresholds are reasonable.

- For our county, the current threshold keeps us from having to prepare an EAW for residential projects.
- The current threshold seems adequate, and there are ways in which the thresholds can be raised (certifying comp plan), but we rarely get anything useful out of these EAWs.
- We are comfortable with this level and it has worked well.
- It seems that the EAW process is being used more as a delaying tactic than for a concern for environmental effects. Especially when one considers the increased regulations and enforcement capabilities we now have.
- The thresholds are consistent with the overall goals and objectives of the EQB, and appear to satisfy primary environmental concerns.
- In county settings, the thresholds are flexible.
- My initial thought was to lower, but through the petition process the county board can make a decision on whether an EAW is needed or not.
- I'm used to the triggers for an EAW now.
- It currently seems reasonable.
- Lower requirement to 70 acres. Many parcels contain just under the 80 requirement and are therefore, not mandatory.
- Seems to make sense with the type of impacts observed.
- The 375 unit threshold seems to catch the right size projects that require a more in-depth environmental review.
- The threshold of 375 attached units has allowed us to "catch" the significant residential projects in Saint Paul.
- Unit thresholds for mandatory EAW typically result in broader impacts to traffic, utility and environmental systems beyond property lines.
- I still think it is valid to have the cumulative wastewater in excess of 20K/day be a trigger.
- Developments smaller than the mandatory thresholds ususally don't need more than local review. Traffic, septic, drainage, and other issues can all be handled by local staff.

Responses for raising the threshold:

- More cities are incorporating ordinaces into their books which protect wetlands, woodlands, etc.
- Most of the EAWs I have been involved in do not provide any additional information - only time and money spent was the result.
- Not much difference between 75 attached single famliy units and 36 or 120 in terms of the environment.
- Many nonsensitive projects are reviewed, especially in non-comprehensive plan covered areas around small cities and in townships.
- Using threshold numbers does not discriminate between 1000 residential units built on a corn field from 1000 units proposed on property with wetlands, woods, rivers, lakes etc.
- We estimate that we will need around 300 new homes built every year for the next 5 years (on average). We are starting to see plats of 40 to 80 acres. At a typical 3 units per acre, we are hitting mandatory threshold for an EAW. For a city of our size, developments of up to 160

acres (400 to 500 units) are not expected to be a problem. It is also easier to plan the utility and stormwater quality needs for a contiguous quarter section than it is for many smaller projects scattered around town.

- I feel that often times, the city's development standards & public hearing requirements are redundant with EAW process. It does make a difference that city standards are up to date and reflect applicable best management practices.
- The process costs a lot an does not seem to provide a value for the money spent.
- If the project is consistent with the adopted Comp Plan, the it should be raised. Comp Plan should incorporate an NRI. The RGU should have zoning to back up Comp Plan.

If you believe the thresholds should be raised or lowered, what is your best estimate of an improved threshold number?

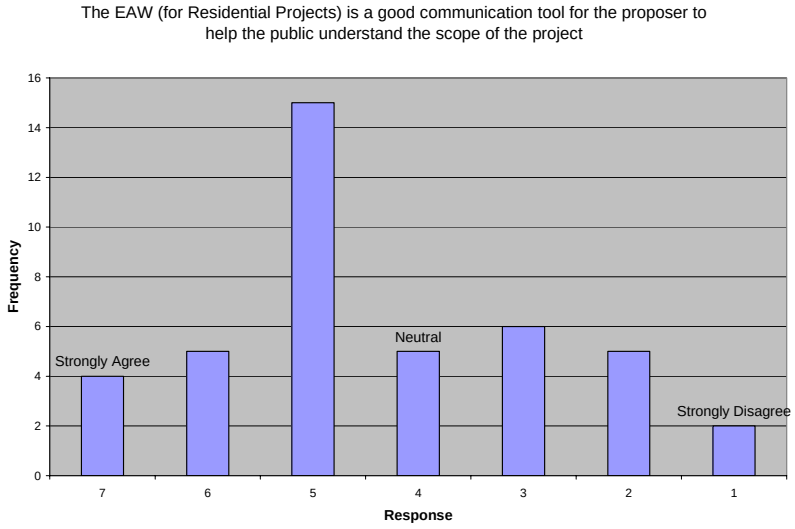
Responses for lowering the threshold:

- Lowered only if lake frontage involved, or a common access lot.
- 15 - 20 Units.
- 20 lots or more in unsewered area.
- 175 unattached, 190 attached. This provides better information to neighbors even when a project is only about 40 acres in area.

Responses for raising the threshold:

- 300 Single Family Units, 400 Multi-Family Units.
- Don't know.
- I think it could be doubled.
- The single family limit for unsewered/unincorporated areas should be raised. We suggest going to 100 unattached units and 100 attached units.
- 160 acres or 400 to 500 units (residential). Drainage is our biggest concern, and we are working with the local watershed district on a "regional" pond concept. Also, a quarter-section of land is a typical agricultural parcel in this area - so developers usually purchase 160 acres at a time.
- The current standard for detached housing translates to about 1/2 of a quarter-section at typical suburban densities, or about 30 acres. I would raise the threshold to 160 acres, or a quarter-section if the development is consistent with an adopted comprehensive plan.
- Double the residential trigger - 500 unattached, 750 attached.

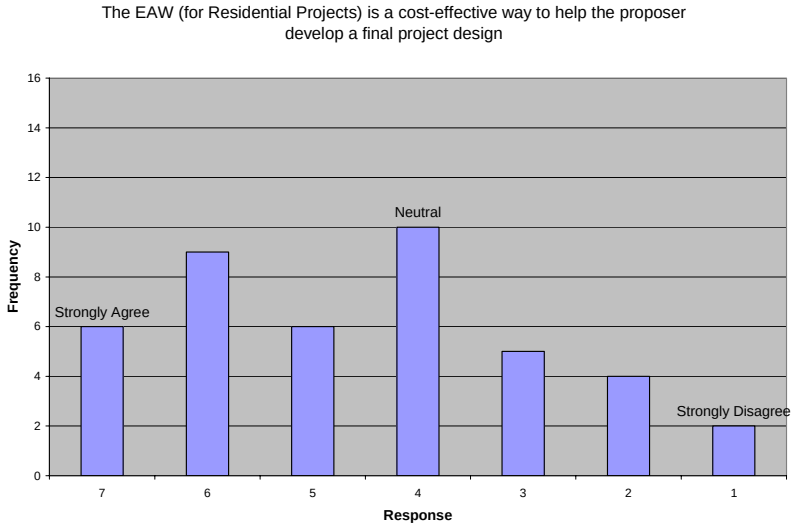
How well do you agree with the statement, "The EAW (for Residential projects) is a good communication tool for the proposer to help the public understand the scope of the project"?



Percentage Agreeing with Statement	57 %
Percentage Neutral	12 %
Percentage Disagreeing with Statement	31 %

Total responses: 42
Mean Score: 4.36

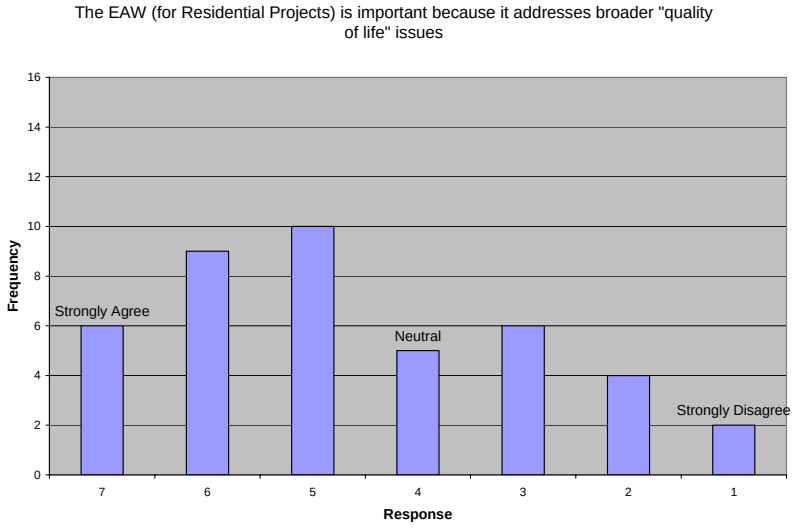
How well do you agree with the statement, "The EAW (for Residential projects) is a cost-effective way to help the proposer develop a final project design"?



Percentage Agreeing with Statement	50 %
Percentage Neutral	24 %
Percentage Disagreeing with Statement	26 %

Total responses: 42
Mean Score: 4.55

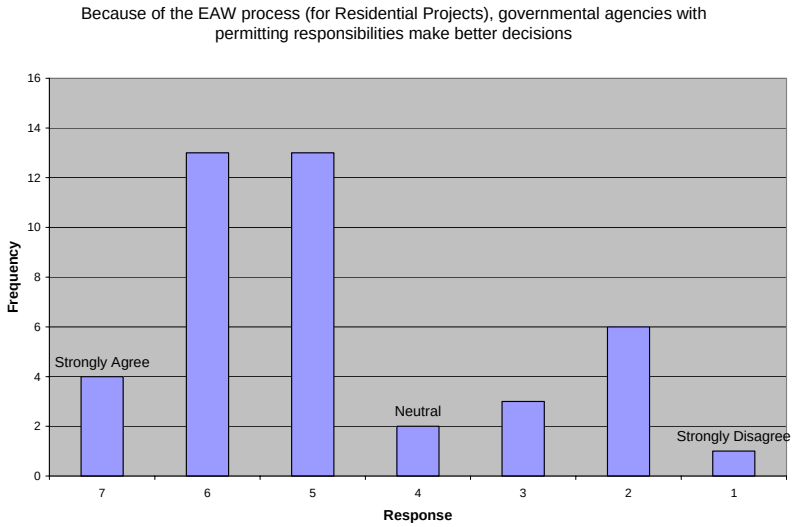
How well do you agree with the statement, “The EAW (for Residential projects) is important because it addresses broader "quality of life" issues”?



Percentage Agreeing with Statement	60 %
Percentage Neutral	12 %
Percentage Disagreeing with Statement	29 %

Total responses: 42
Mean Score: 4.62

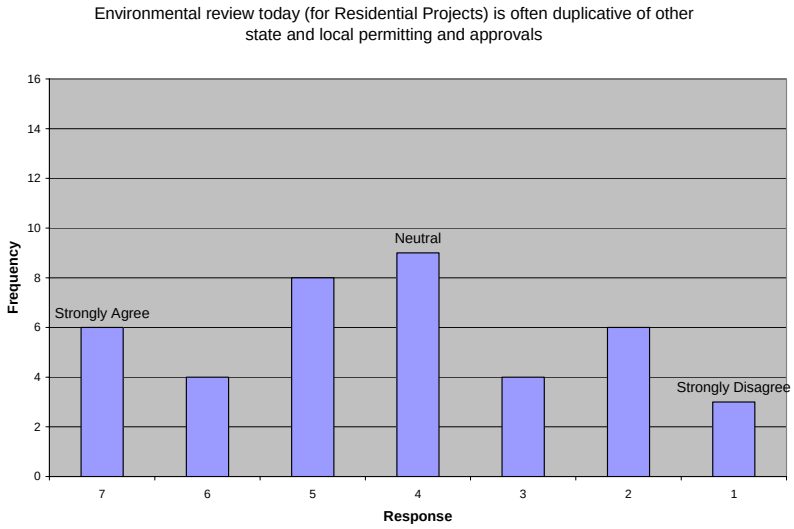
How well do you agree with the statement, “Because of the EAW process (for Residential projects), governmental agencies with permitting responsibilities make better decisions”?



Percentage Agreeing with Statement	71%
Percentage Neutral	5 %
Percentage Disagreeing with Statement	24 %

Total responses: 42
Mean Score: 4.79

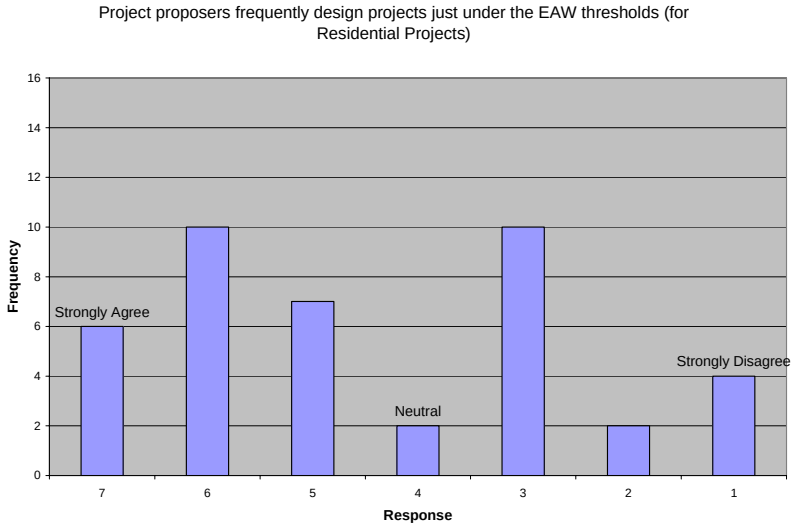
How well do you agree with the statement, "Environmental review today (for Residential projects) is often duplicative of other state and local permitting and approvals"?



Percentage Agreeing with Statement	45 %
Percentage Neutral	23 %
Percentage Disagreeing with Statement	33 %

Total responses: 40
Mean Score: 4.23

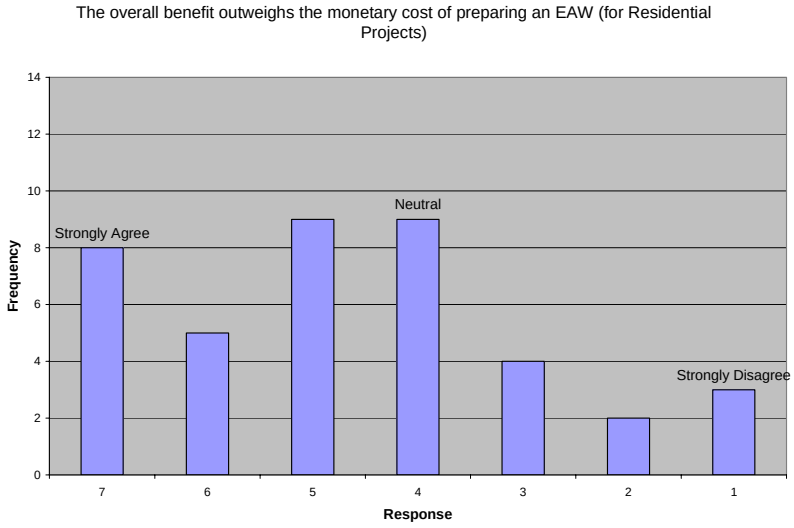
How well do you agree with the statement, "Project proposers frequently design projects just under the EAW thresholds (for Residential projects)"?



Percentage Agreeing with Statement	56 %
Percentage Neutral	5 %
Percentage Disagreeing with Statement	39 %

Total responses: 41
Mean Score: 4.46

How well do you agree with the statement, "The overall benefit outweighs the monetary cost of preparing an EAW (for Residential projects)"?



Percentage Agreeing with Statement	55 %
Percentage Neutral	23 %
Percentage Disagreeing with Statement	23 %

Total responses: 40
Mean Score: 4.65

Appendix C
ALL CATEGORIES – AGGREGATED SURVEY RESULTS

61 Individual Respondents Total
(4 responses were removed from the population because the respondent did not have prior experience working with EAWs)

Since respondents could provide information on up to three mandatory categories, the total number of categorical responses was 117.

Background of the Respondents

RGU type:	36	Cities	(4 from cities of the 1st class, 14 from cities of the 2nd class, 6 from cities of the 3rd class, 12 from cities of the 4th class)
	19	Counties	
	3	Consultants	
	1	Township	
	1	Watershed District	

Region:	25	from the Twin Cities Region	11	from the Central Region
	4	from the West Central Region	5	from the Southeast Region
	5	from the Arrowhead Region	3	from the North Central Region
	1	from the Headwaters Region	1	from the Mid-Minnesota Region
	1	from the East Central Region	1	from the Southwest Region

County:	7	from Hennepin County	6	from Ramsey County
	4	from Dakota County	4	from Benton County
	3	from Sherburne County	2	from Douglas County
	3	from Anoka County	2	from Crow Wing County
	2	from Stearns County	2	from Wabasha County
	2	from Washington County	2	from Wright County
	2	from Scott County	1	from Carlton County
	1	from Otter Tail County	1	from Olmstead County
	1	from Mower County	1	from Morrison County
	1	from Koochiching County	1	from Itasca County
	1	from Isanti County	1	from Goodhue County
	1	from Becker County	1	from Aitkin County
	1	from Kandiyohi County	1	from Lake of the Woods County
	1	from Lyon County	1	from St. Louis County
	1	from Todd County		

Responses to Survey Questions

How many EAWs have you been involved with preparing in the last 10 years?

Responses:	61		
Average:	6.42*	Minimum:	1
Standard Deviation:	7.76	Maximum:	50

** Due to the presence of outliers, a trimmed average was used to more accurately represent the experience of the respondents.*

What is the number of EAWs your organization has been responsible for preparing in the all categories during the years 2000-2003.

Responses:	61		
Average:	4.82*	Minimum:	1
Standard Deviation:	5.11	Maximum:	32

** Due to the presence of outliers, a trimmed average was used to more accurately represent the total number of EAWs prepared by responding organizations.*

On average, how many weeks does it take your organization to process an EAW? ("Process means from the time you receive the complete data portions from the proposer, to the time a decision is made on the need for an environmental impact statement.)

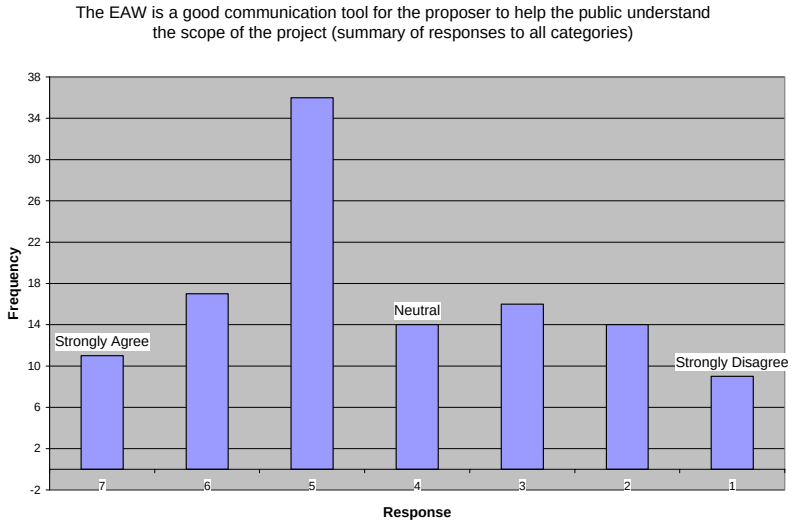
Responses:	113		
Average:	10.1	Minimum:	6*
Standard Deviation:	3.74	Maximum:	26

** There were several responses of 4 weeks or less. Since the minimum amount of time to process an EAW includes a 4 week public comment period, we assumed the respondents misinterpreted the word "process". For every response that was 4 weeks or less, an additional 4 weeks was added to make it consistent with the other responses.*

In your opinion, the EAW thresholds for this category should:

Choice	Count	Percentage Answered
Be lowered	12	10%
Stay the same	73	63%
Be raised	30	26%

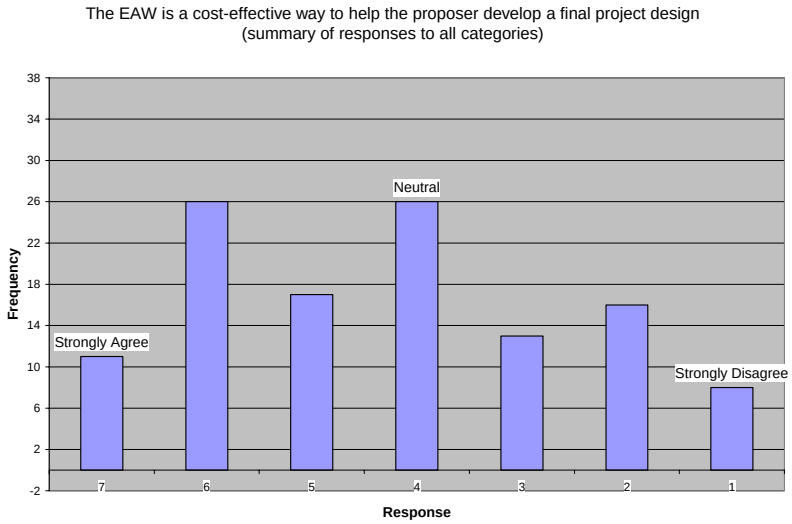
How well do you agree with the statement, "The EAW is a good communication tool for the proposer to help the public understand the scope of the project"? (Summary of responses to all categories.)



Percentage Agreeing with Statement	55 %
Percentage Neutral	12 %
Percentage Disagreeing with Statement	33 %

Total responses: 116
Mean Score: 4.30

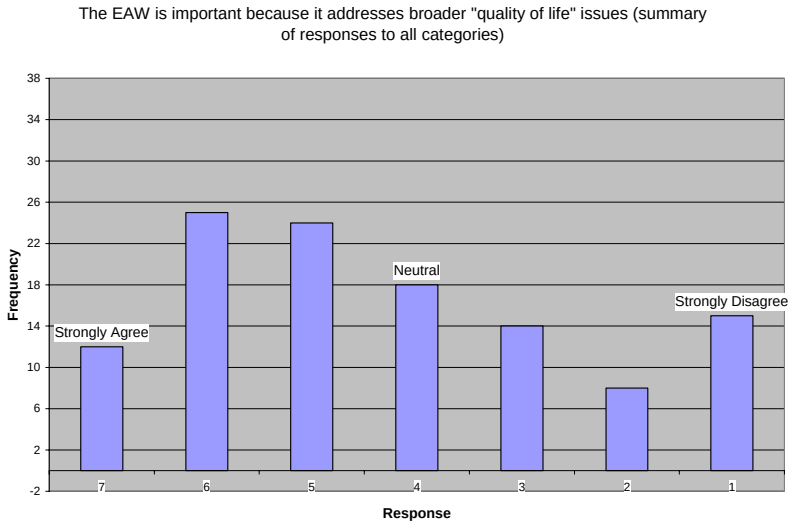
How well do you agree with the statement, "The EAW is a cost-effective way to help the proposer develop a final project design"? (Summary of responses to all categories.)



Percentage Agreeing with Statement	47 %
Percentage Neutral	22 %
Percentage Disagreeing with Statement	31 %

Total responses: 116
Mean Score: 4.31

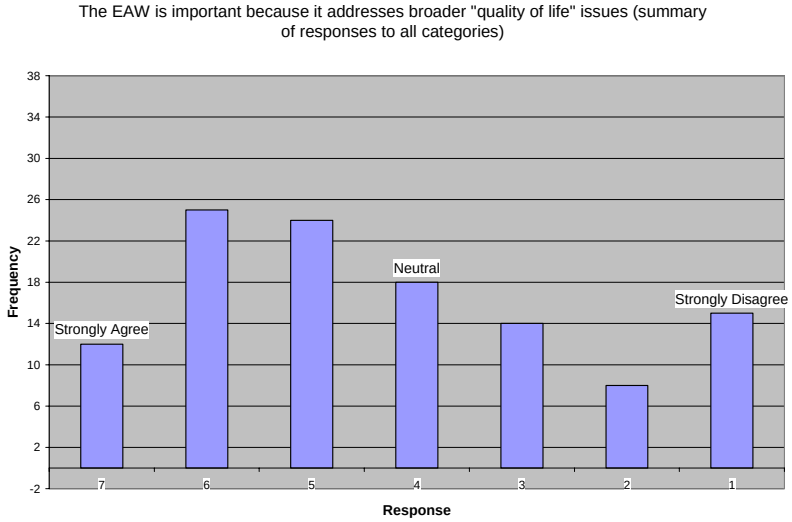
How well do you agree with the statement, “The EAW is important because it addresses broader "quality of life" issues”? (Summary of responses to all categories.)



Percentage Agreeing with Statement	53 %
Percentage Neutral	16 %
Percentage Disagreeing with Statement	31 %

Total responses: 115
Mean Score: 4.33

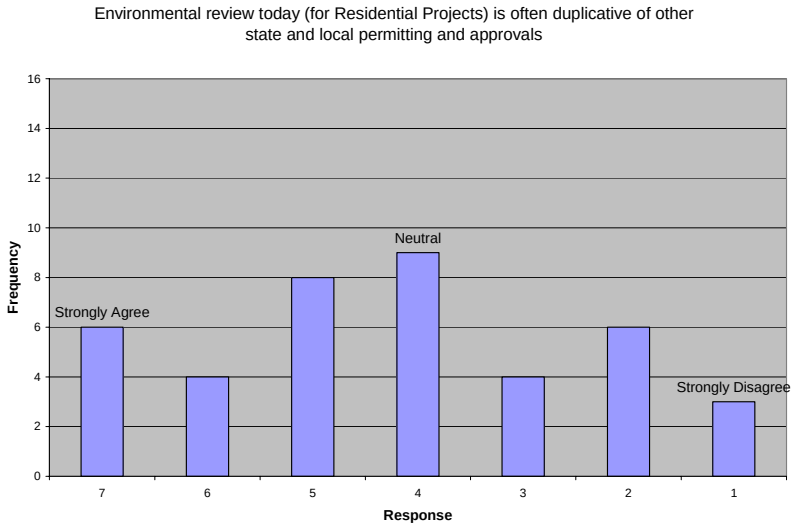
How well do you agree with the statement, “Because of the EAW process, governmental agencies with permitting responsibilities make better decisions”? (Summary of responses to all categories.)



Percentage Agreeing with Statement	61 %
Percentage Neutral	16 %
Percentage Disagreeing with Statement	22 %

Total responses: 116
Mean Score: 4.55

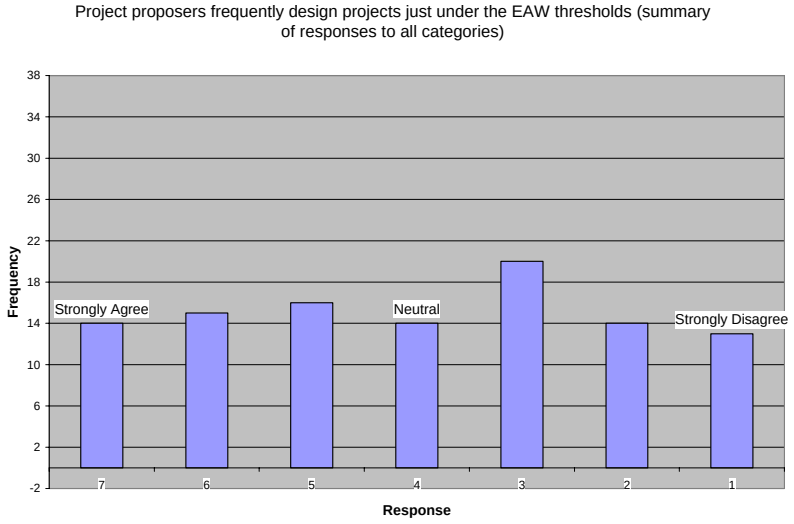
How well do you agree with the statement, "Environmental review today is often duplicative of other state and local permitting and approvals"? (Summary of responses to all categories.)



Percentage Agreeing with Statement	47 %
Percentage Neutral	16 %
Percentage Disagreeing with Statement	37 %

Total responses: 111
Mean Score: 4.35

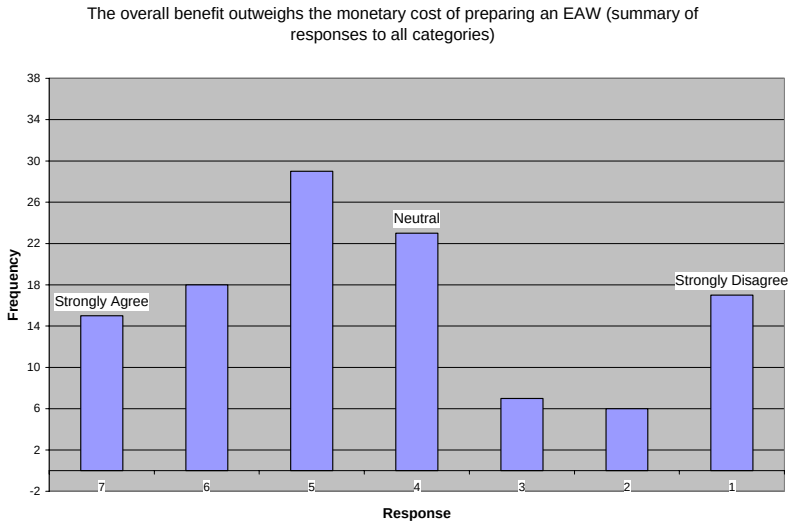
How well do you agree with the statement, "Project proposers frequently design projects just under the EAW thresholds"? (Summary of responses to all categories.)



Percentage Agreeing with Statement	42 %
Percentage Neutral	13 %
Percentage Disagreeing with Statement	44 %

Total responses: 106
Mean Score: 4.01

How well do you agree with the statement, "The overall benefit outweighs the monetary cost of preparing an EAW"? (Summary of responses to all categories.)



Percentage Agreeing with Statement	55 %
Percentage Neutral	20 %
Percentage Disagreeing with Statement	25 %

Total responses: 114
Mean Score: 4.38

Appendix D
INDUSTRIAL/COMMERCIAL/INSTITUTIONAL SURVEY RESULTS

21 Respondents Total

Background of the Respondents

RGU type:	19 Cities	(4 from cities of the 1st class, 9 from cities of the 2nd class, 3 from cities of the 3rd class, 3 cities of the 4th class)		
	2 Consultants			
Region:	13	from the Twin Cities Region	2	from the Central Region
	1	from the North Central Region	1	from the Arrowhead Region
	1	from the East Central	1	from the Southeast Region
County:	5	from Hennepin County	4	from Ramsey County
	2	from Stearns County	1	from Washington County
	1	from Scott County	1	from Isanti County
	1	from Goodhue County	1	from Dakota County
	1	from Crow Wing County	1	from Carlton County
	1	from Anoka County		

Responses to Survey Questions

How many EAWs have you been involved with preparing in the last 10 years?

Responses:	21		
Average:	8.21*	Minimum:	1
Standard Deviation:	7.01	Maximum:	30

** Due to the presence of outliers, a trimmed average was used to more accurately represent the experience of the respondents.*

What is the number of EAWs your organization has been responsible for preparing in the Industrial/Commercial/Institutional category during the years 2000-2003.

Responses:	19		
Average:	2.6	Minimum:	1
Standard Deviation:	1.20	Maximum:	5

What is the number of EAWs your organization has been responsible for preparing in the all categories during the years 2000-2003.

Responses:	21		
Average:	8.2*	Minimum:	1
Standard Deviation:	1.43	Maximum:	30

** Due to the presence of outliers, a trimmed average was used to more accurately represent the total number of EAWs prepared by responding organizations.*

On average, how many weeks does it take your organization to process an EAW for the Residential category? ("Process means from the time you receive the complete data portions from the proposer, to the time a decision is made on the need for an environmental impact statement.)

Responses:	21		
Average:	10.5*	Minimum:	6**
Standard Deviation:	2.87	Maximum:	18

** Due to the presence of outliers, a trimmed average was used to more accurately the represent the length of time it takes to process an EAW for the Industrial/Commercial/ Institutional Category.*

*** There were several responses of 4 weeks or less. Since the minimum amount of time to process an EAW includes a 4 week public comment period, we assumed the respondents misinterpreted the word "process". For every response that was 4 weeks or less, an additional 4 weeks was added to make it consistent with the other responses.*

In your opinion, the EAW thresholds for the Industrial/Commercial/Institutional should:

Choice	Count	Percentage Answered
Be lowered	2	10%
Stay the same	17	81%
Be raised	2	10%

What is the rationale for your recommendation?

Responses for lowering the threshold:

- In [our city], our project review process is more thorough and has more authority than the EAW process. I'm thinking of other jurisdictions without our strong controls. A 300,000 # project could have major impacts. I would drop the threshold to 250,000 or 300,000. Also 25 MW for a power plant is too high. 10 MW is more appropriate.
- Waste strength and volume should be a trigger. Acre ft of storm water should be a trigger. Reflective and stray light should be a trigger.

Responses for leaving the threshold the same:

- An EAW, and later an AURA were the appropriate documents to file in this case - a brownfield redevelopment.
- Building area can create significant trip generation (employees and trucks), while related site improvements could have the environmental impacts, at existing thresholds.
- The threshold is appropriate as an initial benchmark for when buildings and sites get above average or general size - or when traffic, utility, and land characteristics change enough to be placed in a larger review framework.
- Projects of this size are large enough to generate traffic issues usually in activity centers/downtown.
- At 400,000 square feet, we'd expect a large amount of traffic generation, and they are typically located in built up areas.
- 400,000 square feet seems to catch the size projects that we should be looking at more closely through the EAW process.
- I feel the process is working well.
- Local review seems adequate for most projects.
- It works.
- Seems reasonable.
- The thresholds appear to satisfy primary environmental concerns.
- Seems to make sense with the type of impacts observed.
- Industrial, Commercial and commercial projects tend to have more impacts than residential development (e.g. % impervious, traffic generation) and should stay the same.

Responses for raising the threshold:

- The process is often cumbersome with little gained for the money spent.
- The information did not change anything proposed.

If you believe the thresholds should be raised or lowered, what is your best estimate of an improved threshold number?

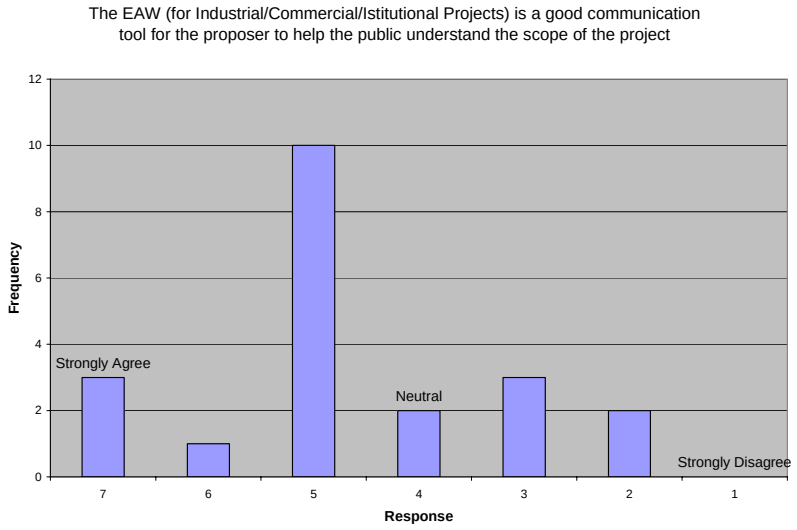
Responses for lowering the threshold:

- This needs engineers; I just know that the area is not enough to bring awareness to waste water and stormwater facilities. It is too discretional at present.

Responses for raising the threshold:

- Don't know

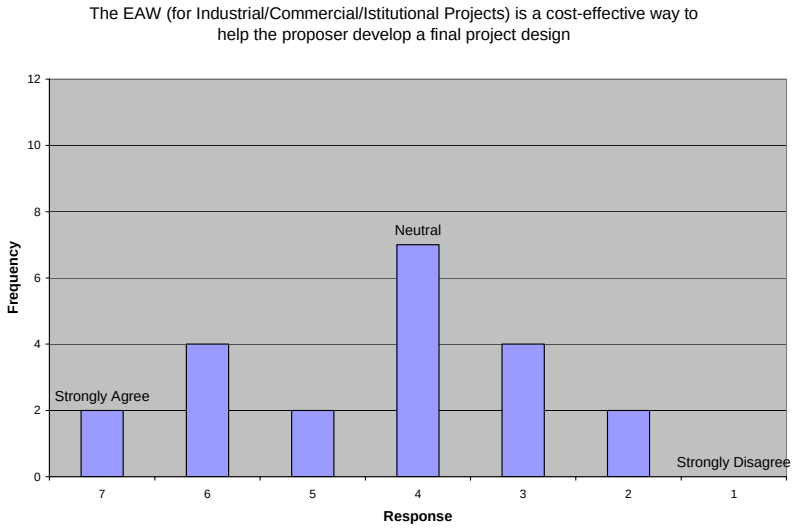
How well do you agree with the statement, "The EAW (for Industrial/Commercial/ Institutional projects) is a good communication tool for the proposer to help the public understand the scope of the project"?



Percentage Agreeing with Statement	67 %
Percentage Neutral	10 %
Percentage Disagreeing with Statement	24 %

Total responses: 21
Mean Score: 4.67

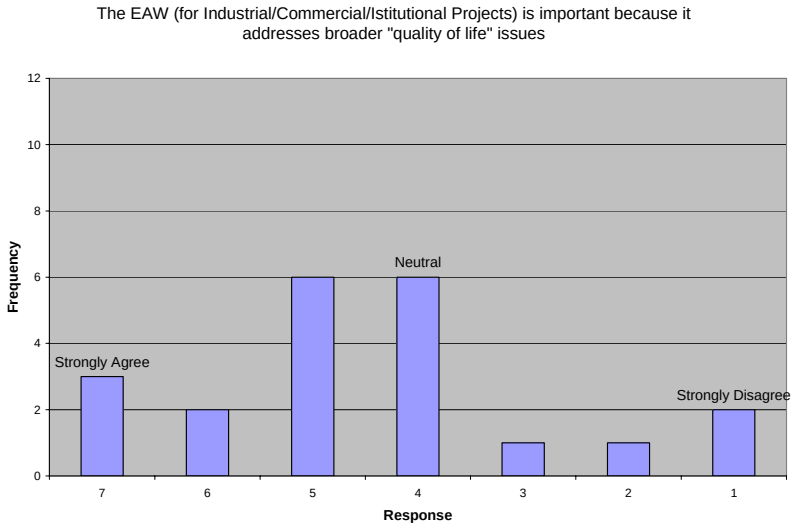
How well do you agree with the statement, “The EAW (for Industrial/Commercial/ Institutional projects) is a cost-effective way to help the proposer develop a final project design”?



Percentage Agreeing with Statement	38 %
Percentage Neutral	33 %
Percentage Disagreeing with Statement	26 %

Total responses: 21
Mean Score: 4.38

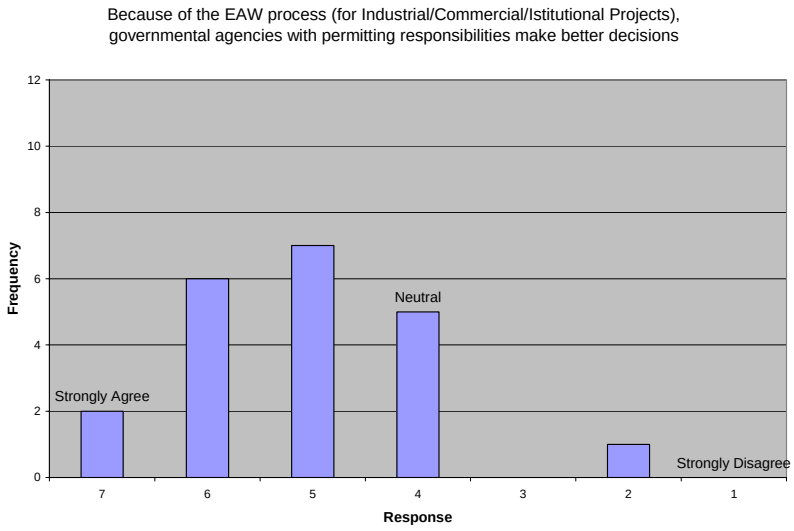
How well do you agree with the statement, “The EAW (for Industrial/Commercial/ Institutional projects) is important because it addresses broader "quality of life" issues”?



Percentage Agreeing with Statement	52 %
Percentage Neutral	29 %
Percentage Disagreeing with Statement	19 %

Total responses: 21
Mean Score: 4.48

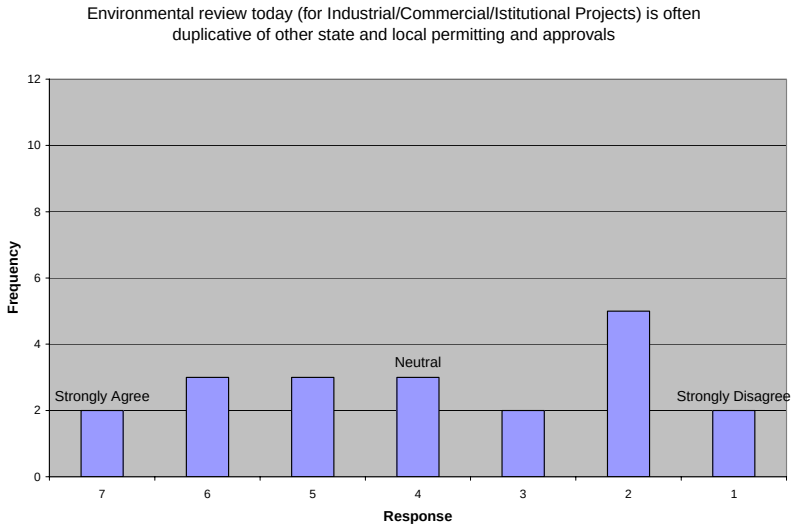
How well do you agree with the statement, "Because of the EAW process (for Industrial/ Commercial/Institutional projects), governmental agencies with permitting responsibilities make better decisions"?



Percentage Agreeing with Statement	71 %
Percentage Neutral	24 %
Percentage Disagreeing with Statement	5 %

Total responses: 21
Mean Score: 5.10

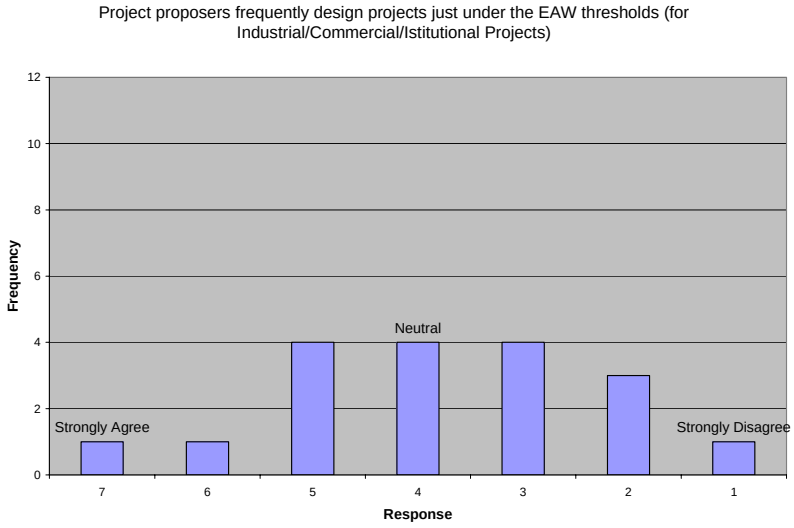
How well do you agree with the statement, "Environmental review today (for Industrial/ Commercial/Institutional projects) is often duplicative of other state and local permitting and approvals"?



Percentage Agreeing with Statement	40 %
Percentage Neutral	15 %
Percentage Disagreeing with Statement	45 %

Total responses: 20
Mean Score: 3.85

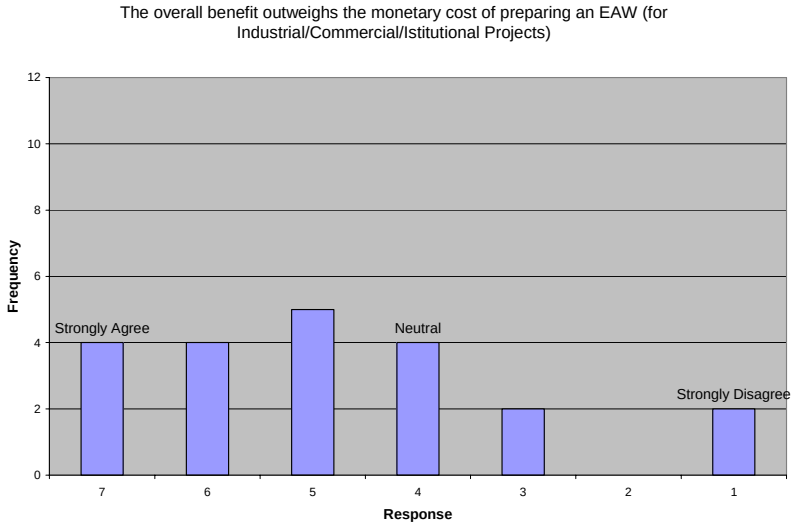
How well do you agree with the statement, "Project proposers frequently design projects just under the EAW thresholds (for Industrial/Commercial/Institutional projects)"?



Percentage Agreeing with Statement	33 %
Percentage Neutral	22 %
Percentage Disagreeing with Statement	44 %

Total responses: 18
Mean Score: 3.78

How well do you agree with the statement, "The overall benefit outweighs the monetary cost of preparing an EAW (for Industrial/Commercial/Institutional projects)"?



Percentage Agreeing with Statement	62 %
Percentage Neutral	19 %
Percentage Disagreeing with Statement	19 %

Total responses: 21
Mean Score: 4.81

Appendix E
NONMETALLIC MINERAL MINING SURVEY RESULTS

13 Respondents Total

Background of the Respondents

RGU type:	5 Cities	(1from a city of the 2nd class, 4 from cities of the 3rd class)
	8 Counties	

Region:	4 from the Central Region	3 from the Twin Cities Region
	3 from the Arrowhead Region	1 from the West Central Region
	1 from the North Central Region	1 from the Mid-Minnesota Region

County:	3 from Dakota County	2 from Benton County
	1 from Becker County	1 from Carlton County
	1 from Aitkin County	1 from Wright County
	1 from St. Louis County	1 from Sherburne County
	1 from Morrison County	1 from Kandiyohi County

Responses to Survey Questions

How many EAWs have you been involved with preparing in the last 10 years?

Responses:	13		
Average:	6.36*	Minimum:	3
Standard Deviation:	4.63	Maximum:	20

** Due to the presence of outliers, a trimmed average was used to more accurately represent the experience of the respondents.*

What is the number of EAWs your organization has been responsible for preparing in the Non-Metallic Mineral Mining category during the years 2000-2003.

Responses:	12		
Average:	1.83	Minimum:	1
Standard Deviation:	1.27	Maximum:	5

What is the number of EAWs your organization has been responsible for preparing in the all categories during the years 2000-2003.

Responses:	13		
Average:	4.62	Minimum:	2
Standard Deviation:	3.02	Maximum:	11

On average, how many weeks does it take your organization to process an EAW for the Non-Metallic Mineral Mining category? ("Process means from the time you receive the complete data portions from the proposer, to the time a decision is made on the need for an environmental impact statement.)

Responses:	13		
Average:	10.09*	Minimum:	6**
Standard Deviation:	5.8	Maximum:	26

** Due to the presence of outliers, a trimmed average was used to more accurately the represent the length of time it takes to process an EAW for the Non-Metallic Mineral Mining Category.*

*** There were several responses of 4 weeks or less. Since the minimum amount of time to process an EAW includes a 4 week public comment period, we assumed the respondents misinterpreted the word "process". For every response that was 4 weeks or less, an additional 4 weeks was added to make it consistent with the other responses.*

In your opinion, the EAW thresholds for the Non-Metallic Mineral Mining Category should:

Choice	Count	Percentage Answered
Be lowered	5	38%
Stay the same	7	54%
Be raised	1	8 %

What is the rationale for your recommendation?

Responses for lowering the threshold:

- Mining, especially with asphalt plant and crusher, causes considerable disruption to traffic flows in the area. Noise and odor also is a problem not to mention dust. The hydrocarbon discharge from the plant is a concern, since the long term effect is unknown.
- Connected actions of some parties are not always reviewed - 40 acres is a lot of land to mine.
- I believe this type of development/impact has a greater effect on the environment and the surrounding area.
- I think there needs to be an acre/foot figure. At present it is 40 acres with a mean depth of 10 feet. What about 39 acres at 20 feet deep? An acre/foot figure needs to be locked in.
- These projects are of such impact on area residents, if there is some initial mitigation, things go much smoother.

Responses for leaving the threshold the same:

- Forty acres has shown to be a good threshold for the size of operations we have.
- Seems adequate.
- We already have public hearing requirements.
- Often times the thresholds seem to be high - but the RGU has the option of ordering a discretionary.

Responses for raising the threshold:

- All gravel pits go through much zoning and much public review. Great controversy is not necessarily addressed by the mandatory EAW threshold. People always have the option of a petition.

If you believe the thresholds should be raised or lowered, what is your best estimate of an improved threshold number?

Responses for lowering the threshold:

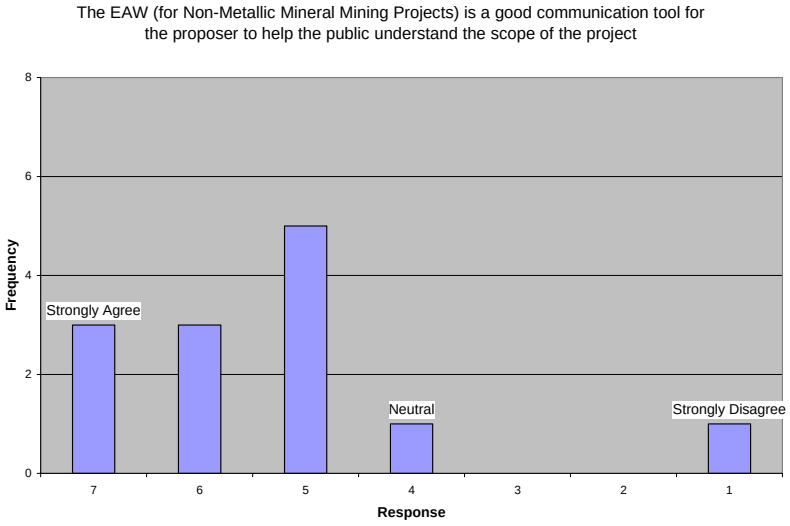
- 10 Acres

- 20 acres - this will create more review for a serious issue that is often kept under the threshold.
- Use an acre/foot figure or cubic yard figure.
- Some exemption should be stated in the rule for smaller extractions.

Responses for raising the threshold:

- Mining peat is 160 acreas but mining gravel is 40 acres. Increase gravel to 160 acres.

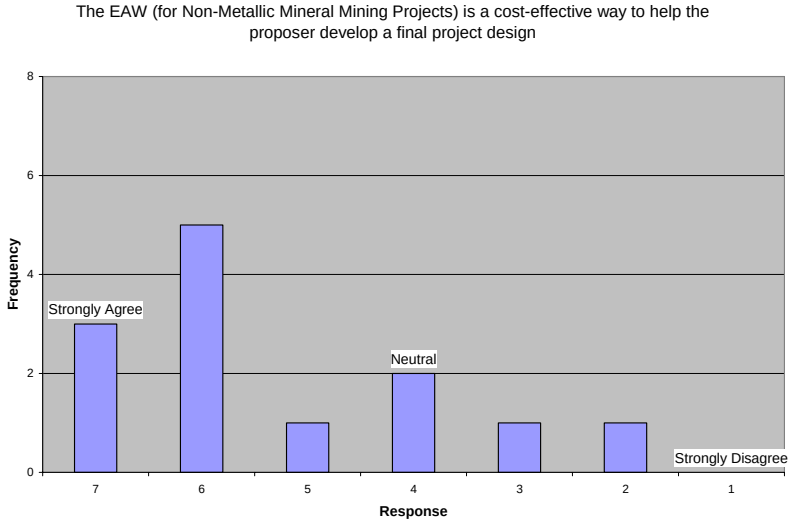
How well do you agree with the statement, "The EAW (for Non-Metallic Mineral Mining projects) is a good communication tool for the proposer to help the public understand the scope of the project"?



Percentage Agreeing with Statement	85 %
Percentage Neutral	8 %
Percentage Disagreeing with Statement	8 %

Total responses: 13
Mean Score: 5.31

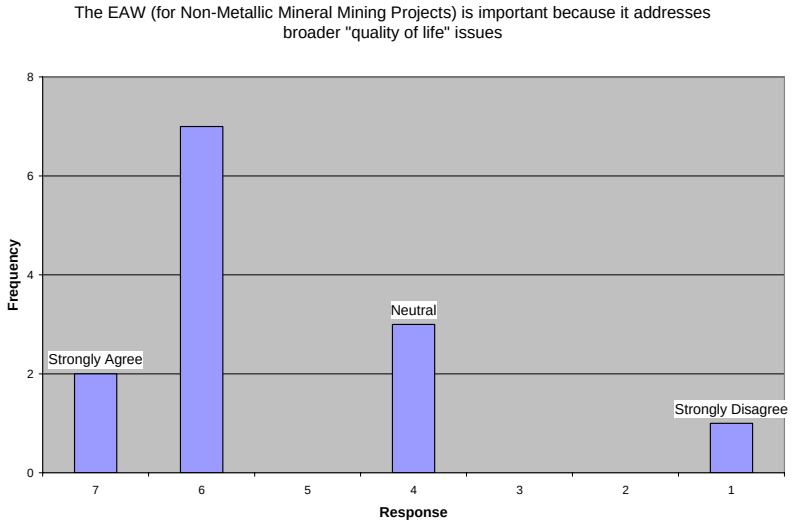
How well do you agree with the statement, “The EAW (for Non-Metallic Mineral Mining projects) is a cost-effective way to help the proposer develop a final project design”?



Percentage Agreeing with Statement	69 %
Percentage Neutral	15 %
Percentage Disagreeing with Statement	15 %

Total responses: 13
Mean Score: 5.31

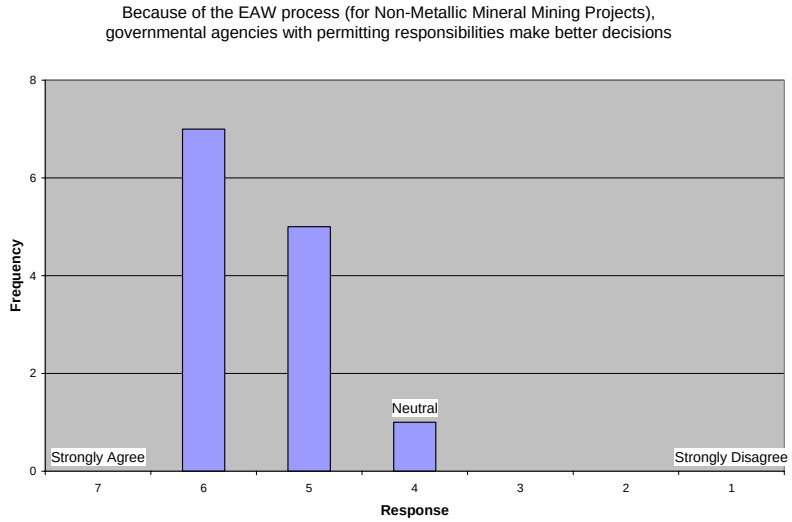
How well do you agree with the statement, “The EAW (for Non-Metallic Mineral Mining projects) is important because it addresses broader "quality of life" issues”?



Percentage Agreeing with Statement	69 %
Percentage Neutral	23 %
Percentage Disagreeing with Statement	8 %

Total responses: 13
Mean Score: 5.31

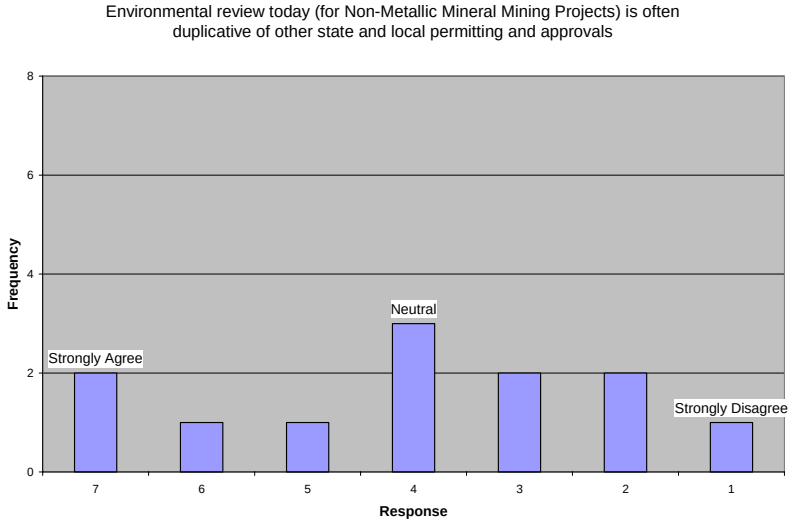
How well do you agree with the statement, "Because of the EAW process (for Non-Metallic Mineral Mining projects), governmental agencies with permitting responsibilities make better decisions"?



Percentage Agreeing with Statement	92 %
Percentage Neutral	8 %
Percentage Disagreeing with Statement	0 %

Total responses: 13
Mean Score: 5.46

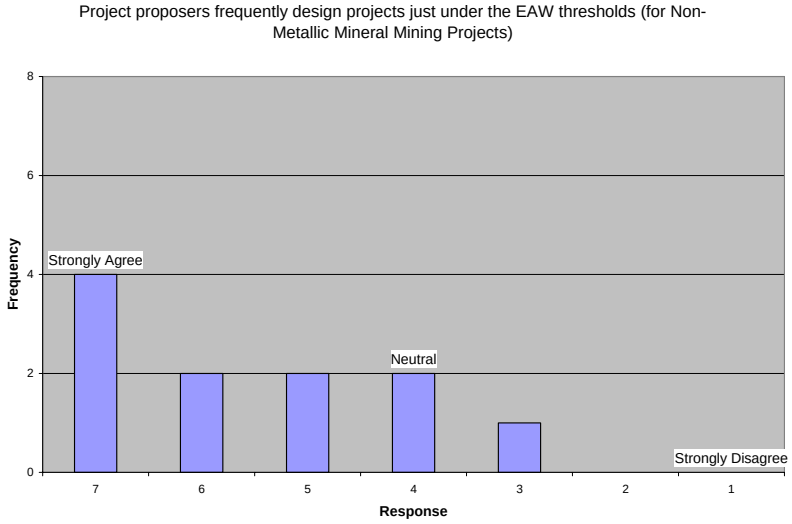
How well do you agree with the statement, "Environmental review today (for Non-Metallic Mineral Mining projects) is often duplicative of other state and local permitting and approvals"?



Percentage Agreeing with Statement	33 %
Percentage Neutral	25 %
Percentage Disagreeing with Statement	42 %

Total responses: 12
Mean Score: 4.00

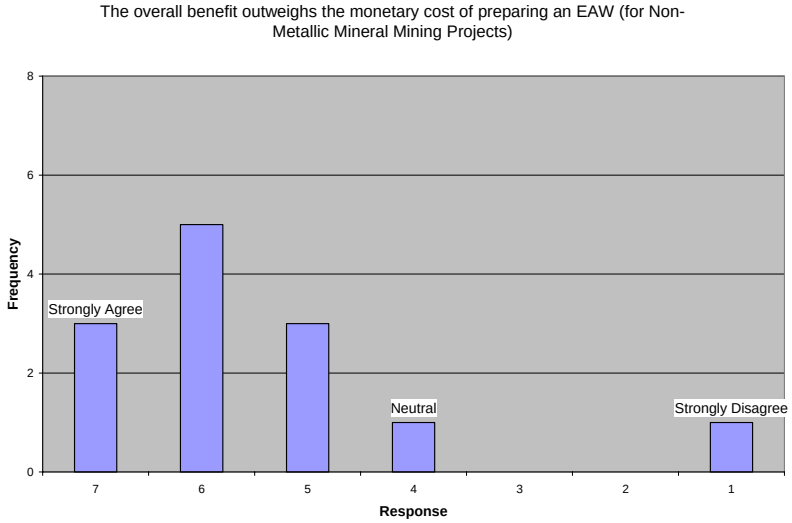
How well do you agree with the statement, "Project proposers frequently design projects just under the EAW thresholds (for Non-Metallic Mineral Mining projects)"?



Percentage Agreeing with Statement	73 %
Percentage Neutral	18 %
Percentage Disagreeing with Statement	9 %

Total responses: 11
Mean Score: 5.55

How well do you agree with the statement, "The overall benefit outweighs the monetary cost of preparing an EAW (for Non-Metallic Mineral Mining projects)"?



Percentage Agreeing with Statement	85 %
Percentage Neutral	8 %
Percentage Disagreeing with Statement	8 %

Total responses: 13
Mean Score: 5.46

Appendix F
LAND-USE CONVERSION SURVEY RESULTS

12 Respondents Total

Background of the Respondents

RGU type:	5 Cities	(1 from a city of the 2nd class, 2 from cities of the 3rd class, 2 from cities of the 4th class)
	6 Counties	
	1 Consultant	

Region:	3 from the Twin Cities Region	2 from the Central Region
	1 from the Southwest Region	1 from the Southeast Region
	1 from the West Central Region	1 from the Headwaters Region
	1 from the North Central Region	1 from the Arrowhead Region

County:	1 from Wright County	1 from Wabasha County
	1 from Todd County	1 from Lyon County
	1 from Hennepin County	1 from Lake of the Woods County
	1 from Dakota County	1 from Benton County
	1 from Becker County	1 from Anoka County
	1 from Aitkin County	

Responses to Survey Questions

How many EAWs have you been involved with preparing in the last 10 years?

Responses:	12		
Average:	6.4*	Minimum:	1
Standard Deviation:	13.08	Maximum:	50

** Due to the presence of outliers, a trimmed average was used to more accurately represent the experience of the respondents.*

What is the number of EAWs your organization has been responsible for preparing in the Land-Use Conversion category during the years 2000-2003.

Responses:	12		
Average:	2.83	Minimum:	1
Standard Deviation:	1.79	Maximum:	6

What is the number of EAWs your organization has been responsible for preparing in the all categories during the years 2000-2003.

Responses:	12		
Average:	5.3*	Minimum:	1
Standard Deviation:	4.2	Maximum:	16

** Due to the presence of outliers, a trimmed average was used to more accurately represent the total number of EAWs prepared by responding organizations.*

On average, how many weeks does it take your organization to process an EAW for the Land-Use Conversion category? ("Process means from the time you receive the complete data portions from the proposer, to the time a decision is made on the need for an environmental impact statement.)

Responses:	12		
Average:	9.9*	Minimum:	7
Standard Deviation:	4.85	Maximum:	25

** Due to the presence of outliers, a trimmed average was used to more accurately the represent the length of time it takes to process an EAW for the Land-Use Conversion Category.*

In your opinion, the EAW thresholds for the Land-Use Conversion Category should:

Choice	Count	Percentage Answered
Be lowered	0	0 %
Stay the same	9	75%
Be raised	3	25%

What is the rationale for your recommendation?

Responses for leaving the threshold the same:

- Very little development in this area has required an EAW.
- Projects that are less than 80 acres seem to be handled well at the local level with local oversight. Projects larger than 80 acres should have additional input and often times the input is beneficial.
- I'm not sure. How useful the review process is depends on the amount of land to be converted. If a threshold has to be picked, 80 acres isn't out of line.
- Seems to be good threshold for addressing environmental impacts.
- I believe EAW is useful when considering the impacts of a conversion of land uses without the benefit of applying development regulations to a project that is moving through the design review process. However, unless it is sponsored, the RGU has to pay for it somehow.
- The threshold seems OK.
- I believe the process has worked well.

Responses for raising the threshold:

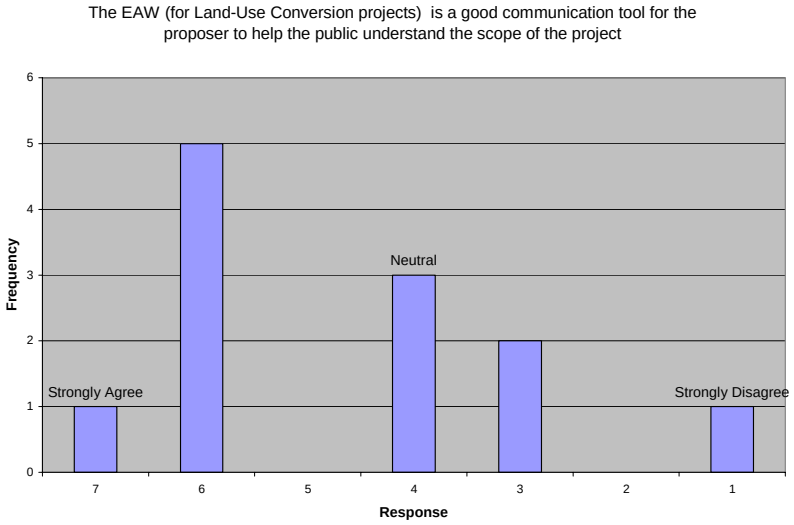
- For a community with established comprehensive plans and development regulations, the EAW process contributes little to the development review.
- Unsewered 2.5 acre lots do not, in my opinion, generate significant environmental impact
- The 80 acre threshold is too close to the "standard" 80 acre parcel ownership by one individual (79.5 acres vs. 80.5 acres).

If you believe the thresholds should be raised or lowered, what is your best estimate of an improved threshold number?

Responses for raising the threshold:

- 120-160 acres. It is comparable to smaller acreage increase in urban developments.
- We suggest raising the limit to 100 acres.

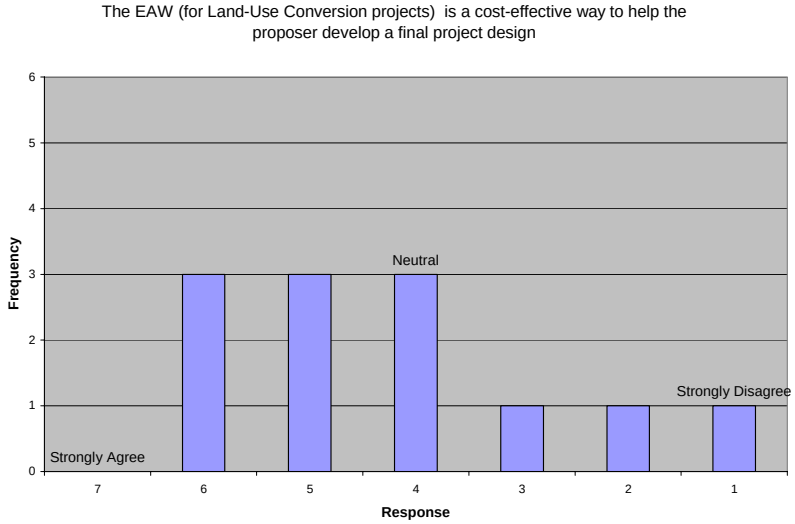
How well do you agree with the statement, "The EAW (for Land-Use Conversion projects) is a good communication tool for the proposer to help the public understand the scope of the project"?



Percentage Agreeing with Statement	50 %
Percentage Neutral	25 %
Percentage Disagreeing with Statement	25 %

Total responses: 12
Mean Score: 4.67

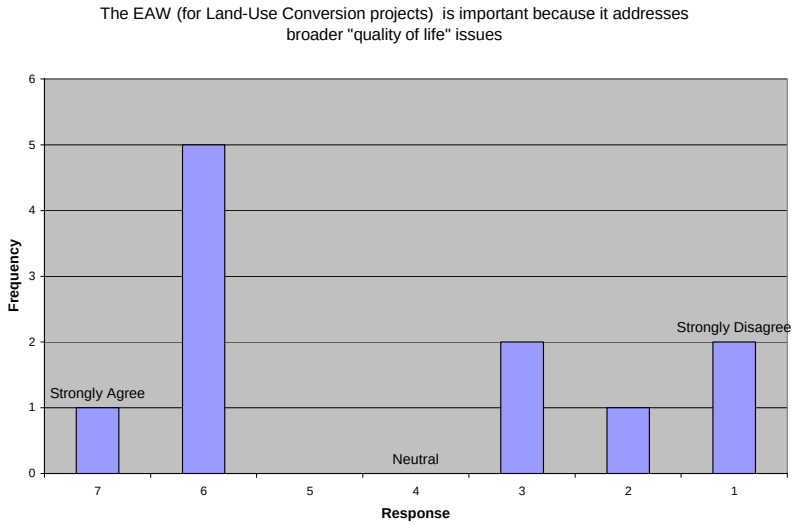
How well do you agree with the statement, "The EAW (for Land-Use Conversion projects) is a cost-effective way to help the proposer develop a final project design"?



Percentage Agreeing with Statement	50 %
Percentage Neutral	25 %
Percentage Disagreeing with Statement	25 %

Total responses: 12
Mean Score: 4.25

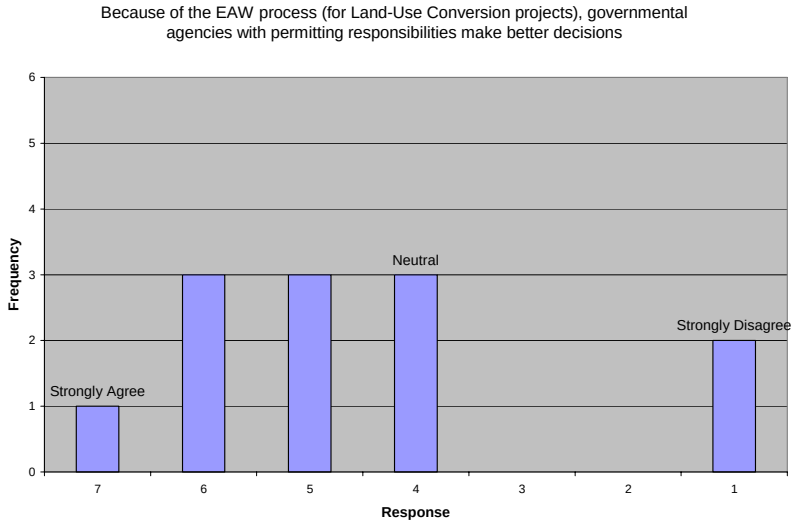
How well do you agree with the statement, “The EAW (for Land-Use Conversion projects) is important because it addresses broader "quality of life" issues”?



Percentage Agreeing with Statement	55 %
Percentage Neutral	0 %
Percentage Disagreeing with Statement	46 %

Total responses: 11
Mean Score: 4.27

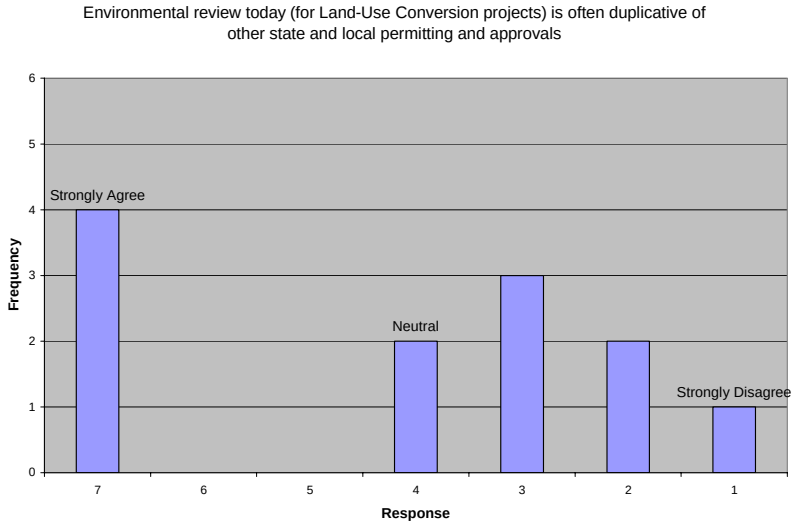
How well do you agree with the statement, “Because of the EAW process (for Land-Use Conversion projects), governmental agencies with permitting responsibilities make better decisions”?



Percentage Agreeing with Statement	58 %
Percentage Neutral	25 %
Percentage Disagreeing with Statement	17 %

Total responses: 12
Mean Score: 4.50

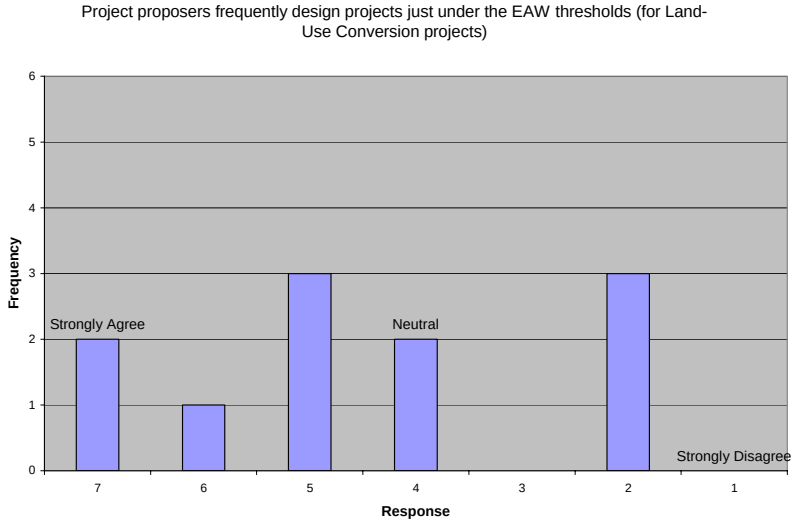
How well do you agree with the statement, "Environmental review today (for Land-Use Conversion projects) is often duplicative of other state and local permitting and approvals"?



Percentage Agreeing with Statement	33 %
Percentage Neutral	17 %
Percentage Disagreeing with Statement	50 %

Total responses: 12
Mean Score: 4.17

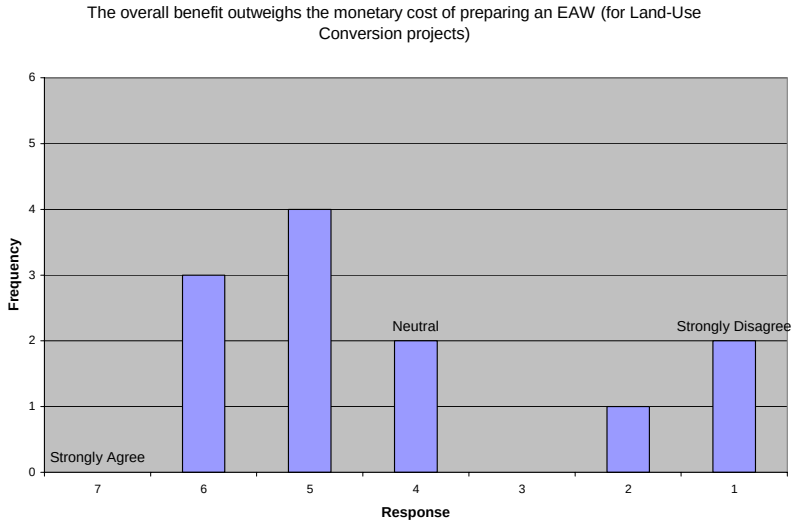
How well do you agree with the statement, "Project proposers frequently design projects just under the EAW thresholds (for Land-Use Conversion projects)"?



Percentage Agreeing with Statement	55 %
Percentage Neutral	18 %
Percentage Disagreeing with Statement	27 %

Total responses: 11
Mean Score: 4.45

How well do you agree with the statement, "The overall benefit outweighs the monetary cost of preparing an EAW (for Land-Use Conversion projects)"?



Percentage Agreeing with Statement	59 %
Percentage Neutral	17 %
Percentage Disagreeing with Statement	25 %

Total responses: 12
Mean Score: 4.17

Appendix G
HIGHWAY SURVEY RESULTS

9 Respondents Total

Background of the Respondents

RGU type:	3 Cities	(2 from cities of the 2nd class, 1 from a city of the 4th class)
	4 Counties	
	2 Consultants	

Region:	3 from the Twin Cities Region	2 from the Arrowhead Region
	2 from the North Central Region	

County:	2 from Crow Wing County	1 from Scott County
	1 from Ramsey County	1 from Koochiching County
	1 from Hennepin County	1 from St. Louis County

Responses to Survey Questions

How many EAWs have you been involved with preparing in the last 10 years?

Responses:	9		
Average:	11.73*	Minimum:	1
Standard Deviation:	16.63	Maximum:	50

** Due to the presence of outliers, a trimmed average was used to more accurately represent the experience of the respondents.*

What is the number of EAWs your organization has been responsible for preparing in the Highway category during the years 2000-2003.

Responses:	8		
Average:	3.25*	Minimum:	1
Standard Deviation:	1.06	Maximum:	10

** Due to the presence of outliers, a trimmed average was used to more accurately represent the number of Highway EAWs prepared by responding organizations.*

What is the number of EAWs your organization has been responsible for preparing in the all categories during the years 2000-2003.

Responses:	9		
Average:	7.62*	Minimum:	2
Standard Deviation:	9.68	Maximum:	32

** Due to the presence of outliers, a trimmed average was used to more accurately represent the total number of EAWs prepared by responding organizations.*

On average, how many weeks does it take your organization to process an EAW for the Highway category? ("Process means from the time you receive the complete data portions from the proposer, to the time a decision is made on the need for an environmental impact statement.)

Responses:	8		
Average:	11.13	Minimum:	6*
Standard Deviation:	3.83	Maximum:	16

** There were several responses of 4 weeks or less. Since the minimum amount of time to process an EAW includes a 4 week public comment period, we assumed the respondents misinterpreted the word "process". For every response that was 4 weeks or less, an additional 4 weeks was added to make it consistent with the other responses.*

In your opinion, the EAW thresholds for the Highway Category should:

Choice	Count	Percentage Answered
Be lowered	0	0%
Stay the same	6	66%
Be raised	3	33%

What is the rationale for your recommendation?

Responses for leaving the threshold the same:

- Current thresholds work - address that needs to be addressed w/o being onerous.
- Big impact projects trigger environmental review process, no/minimal impact projects do not.
- The EAW threshold for highway projects flushes out projects that have potential to cause adverse impacts.
- We typically do not have "new" highway projects greater than 1 mile in length. It is more likely that we would improve on existing township road.

Responses for raising the threshold:

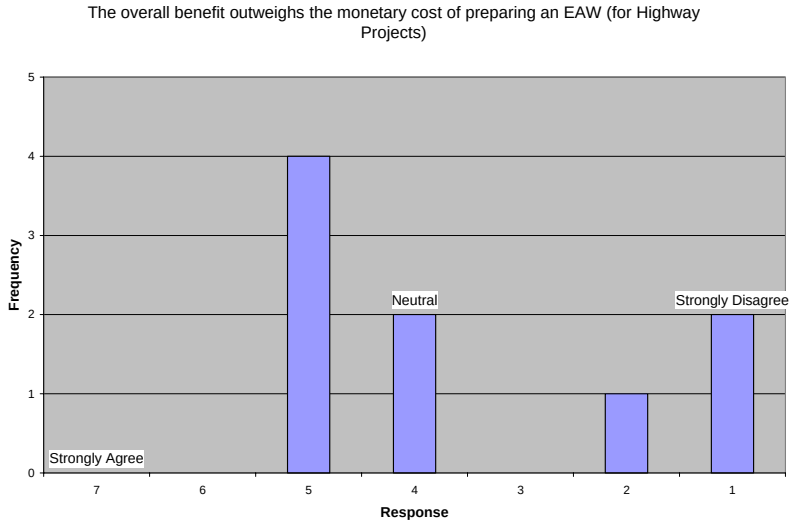
- Highway projects already go through much agency & public review with meetings, hearings, and permits. The only comments we get on these are from agency staff whose primary job is to comment on EAWs. It is simply needless duplication.
- Most of the environmental impacts for Highway Projects involve wetland impacts. Most of the highway improvement projects are involve impacting wetlands that have already been impacted - adjacent to highways or highway crosses. The WCA and other permitting agencies, DNR, and Corps of Engineers, require a sequencing process of Avoid, Minimize, and Mitigate. Therefore, during the design process we are already trying to address wetland impacts by avoidance, minimizing impacts, and then mitigating any impacts. The permitting agencies already have the authority and this process in place to protect the wetlands.
- The subpart 22a indicates "collector" roads. This should apply to "arterial" roads which are higher traffic volumes roads. For arterial roads the one mile of new road is appropriate.

If you believe the thresholds should be raised or lowered, what is your best estimate of an improved threshold number?

Responses for raising the threshold:

- A - Change from "collector" to "arterial" roads B - Should raise length of new lane construction to five miles from one mile existing now. C - This should be eliminated totally. This work should be exempt from and EAW.
- Depending on the impervious coverage requirements of 16 zone district, stormwater in the system or ditch be reviewed based on the build out or "pave out" of the micro watershed of the roadway.

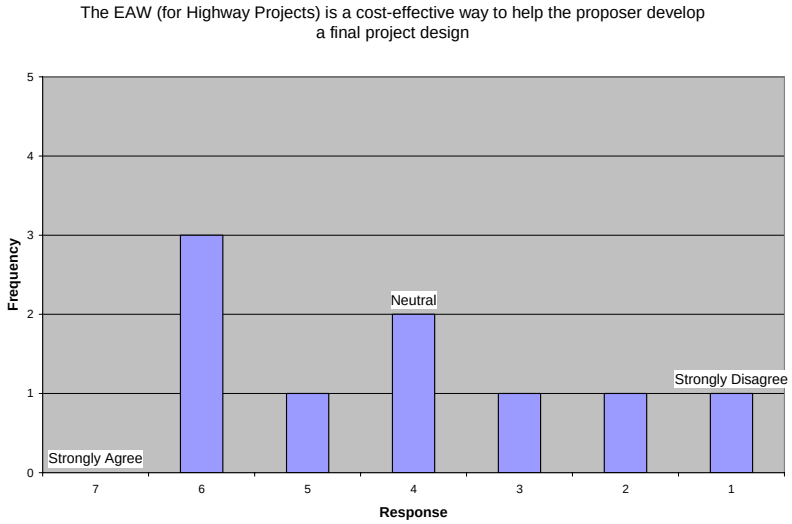
How well do you agree with the statement, "The EAW (for Highway projects) is a good communication tool for the proposer to help the public understand the scope of the project"?



Percentage Agreeing with Statement	56 %
Percentage Neutral	0 %
Percentage Disagreeing with Statement	44 %

Total responses: 9
Mean Score: 3.89

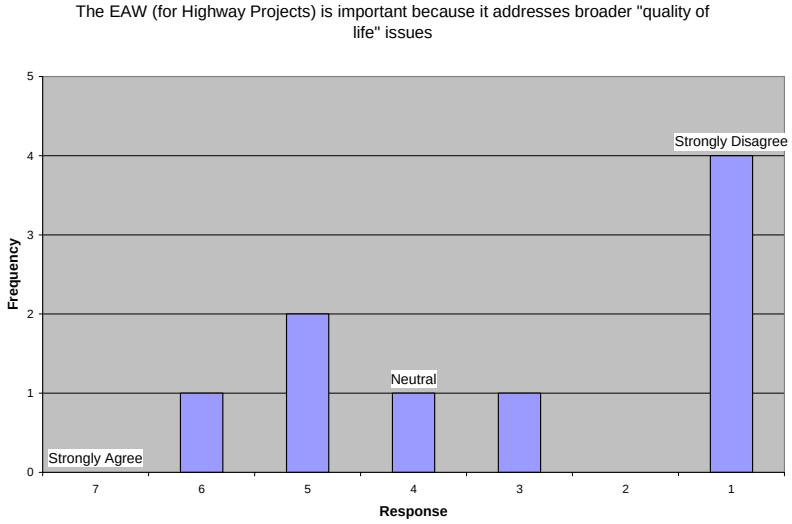
How well do you agree with the statement, "The EAW (for Highway projects) is a cost-effective way to help the proposer develop a final project design"?



Percentage Agreeing with Statement	44 %
Percentage Neutral	22 %
Percentage Disagreeing with Statement	33 %

Total responses: 9
Mean Score: 4.11

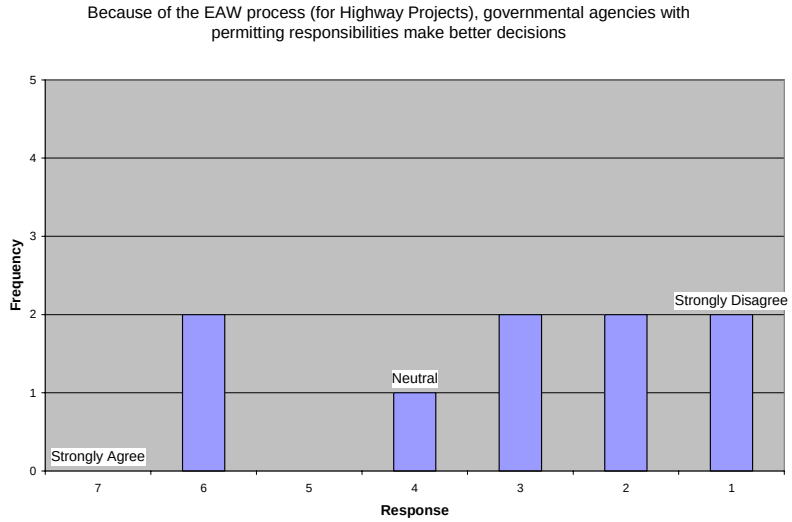
How well do you agree with the statement, “The EAW (for Highway projects) is important because it addresses broader "quality of life" issues”?



Percentage Agreeing with Statement	33 %
Percentage Neutral	11 %
Percentage Disagreeing with Statement	56 %

Total responses: 9
Mean Score: 3.00

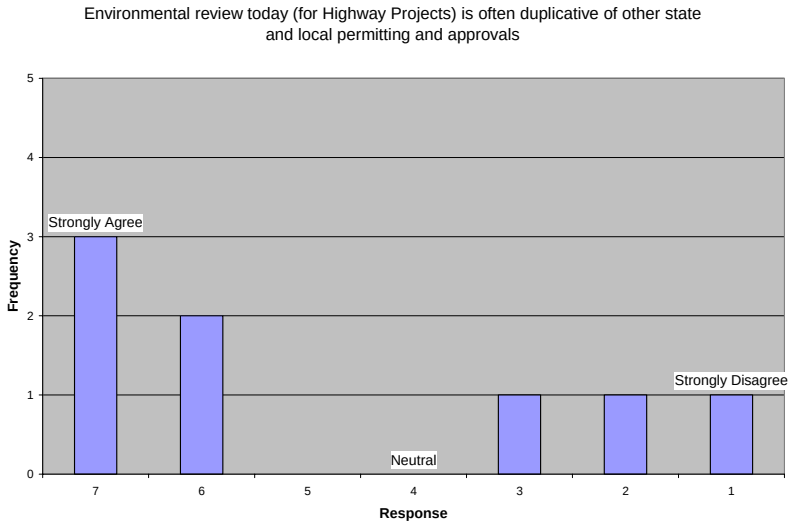
How well do you agree with the statement, “Because of the EAW process (for Highway projects), governmental agencies with permitting responsibilities make better decisions”?



Percentage Agreeing with Statement	22 %
Percentage Neutral	11 %
Percentage Disagreeing with Statement	67 %

Total responses: 9
Mean Score: 3.11

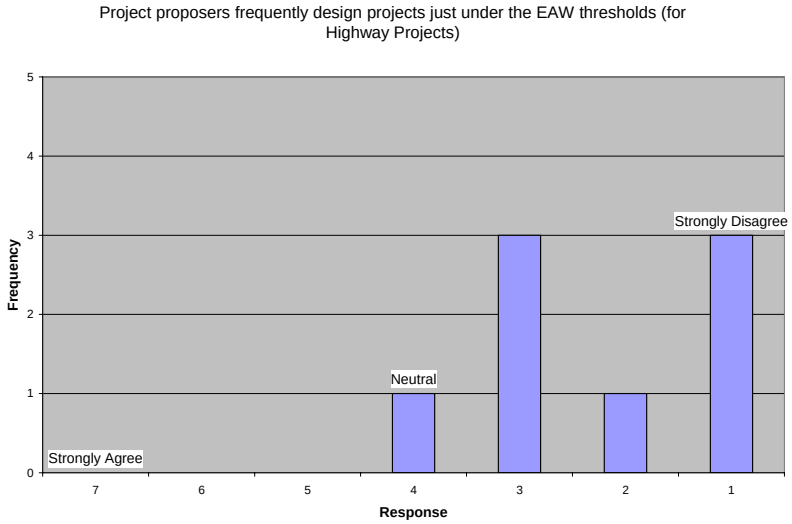
How well do you agree with the statement, "Environmental review today (for Highway projects) is often duplicative of other state and local permitting and approvals"?



Percentage Agreeing with Statement	63 %
Percentage Neutral	0 %
Percentage Disagreeing with Statement	38 %

Total responses: 8
Mean Score: 4.88

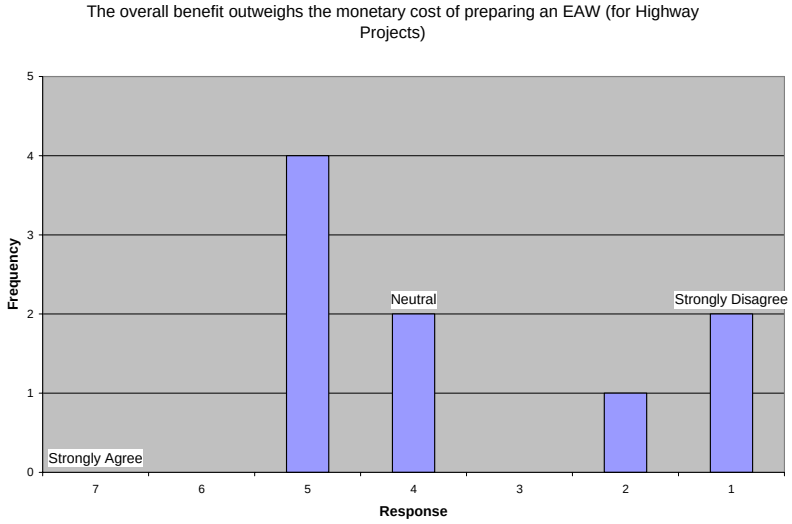
How well do you agree with the statement, "Project proposers frequently design projects just under the EAW thresholds (for Highway projects)"?



Percentage Agreeing with Statement	0 %
Percentage Neutral	13 %
Percentage Disagreeing with Statement	88 %

Total responses: 8
Mean Score: 2.25

How well do you agree with the statement, "The overall benefit outweighs the monetary cost of preparing an EAW (for Highway projects)"?



Percentage Agreeing with Statement	44 %
Percentage Neutral	22 %
Percentage Disagreeing with Statement	33 %

Total responses: 9
Mean Score: 3.56

Appendix H
MIXED COMMERCIAL/RESIDENTIAL SURVEY RESULTS

9 Respondents Total

Background of the Respondents

RGU type:	7 Cities	(5 from cities of the 2nd class, 2 from cities of the 4th class)
	1 County	
	1 Consultant	

Region:	5 from the Twin Cities Region
	2 from the West Central Region
	1 from the Central Region

County:	1 from Washington County	1 from Otter Tail County
	1 from Scott County	1 from Hennepin County
	1 from Dakota County	1 from Crow Wing County
	1 from Benton County	1 from Anoka County

Responses to Survey Questions

How many EAWs have you been involved with preparing in the last 10 years?

Responses:	8		
Average:	6.5	Minimum:	1
Standard Deviation:	3.3	Maximum:	10

What is the number of EAWs your organization has been responsible for preparing in the Mixed Commercial/Residential category during the years 2000-2003.

Responses:	8		
Average:	5.25	Minimum:	1
Standard Deviation:	4.17	Maximum:	11

What is the number of EAWs your organization has been responsible for preparing in the all categories during the years 2000-2003.

Responses:	9		
Average:	7.67	Minimum:	1
Standard Deviation:	5.94	Maximum:	18

On average, how many weeks does it take your organization to process an EAW for the Mixed Commercial/Residential category? ("Process means from the time you receive the complete data portions from the proposer, to the time a decision is made on the need for an environmental impact statement.)

Responses:	8		
Average:	9.63	Minimum:	3
Standard Deviation:	3.7	Maximum:	16

In your opinion, the EAW thresholds for the Mixed Commercial/Residential Category should:

Choice	Count	Percentage Answered
Be lowered	0	0 %
Stay the same	6	67 %
Be raised	3	33 %

What is the rationale for your recommendation?

Responses for leaving the threshold the same:

- The current threshold appears to work fine.

- It provides enough leeway to enable the project, if it is smaller, to avoid the EAW. But our project was almost 100 acres in size and probably should have had an EAW prepared.
- It seems that the EAW process is being used more as a delaying tactic than for a concern for environmental effects. Especially when one considers the increased regulations and enforcement capabilities we now have.
- Industrial - commercial projects can vary widely in their impact on neighboring properties and in utility needs.

Responses for raising the threshold:

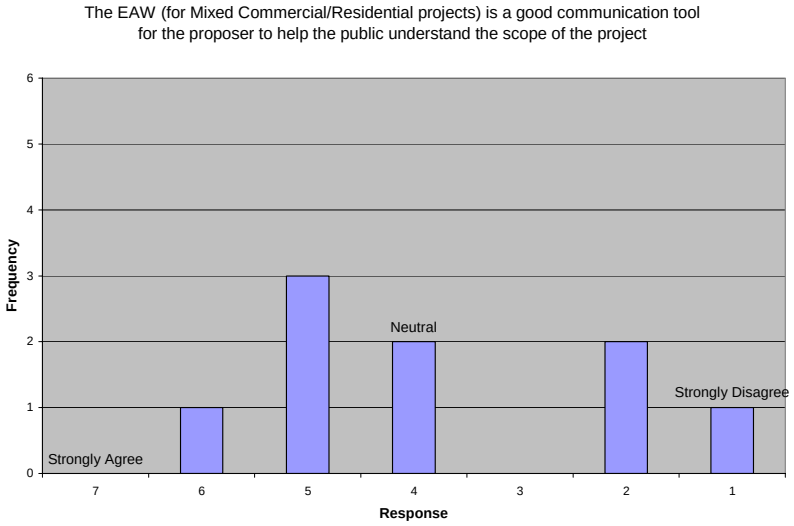
- If the project is consistent with the adopted Comp Plan, then it should be raised. Comp Plans should incorporate an NRI. The RGU should have zoning to back up Comp Plan.
- Usually these mixed - use projects contain affordable housing components. The cost of preparation (including the cost of "time") adds to the cost of that housing.
- Most EAWs have not produced any additional information about the project.

If you believe the thresholds should be raised or lowered, what is your best estimate of an improved threshold number?

Responses for raising the threshold:

- Double the residential trigger - 500 unattached, 750 attached
- Add 100 + units to the threshold.
- Don't know.

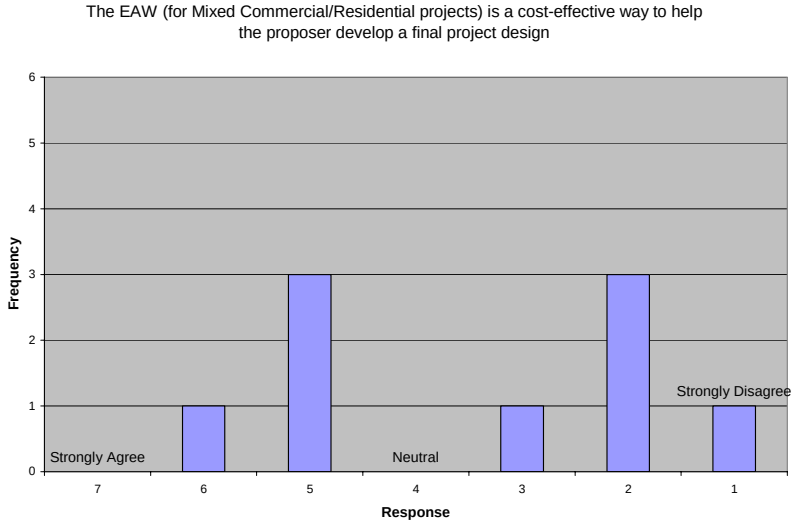
How well do you agree with the statement, "The EAW (for Mixed Commercial/ Residential projects) is a good communication tool for the proposer to help the public understand the scope of the project"?



Percentage Agreeing with Statement	44 %
Percentage Neutral	22 %
Percentage Disagreeing with Statement	33 %

Total responses: 9
Mean Score: 3.78

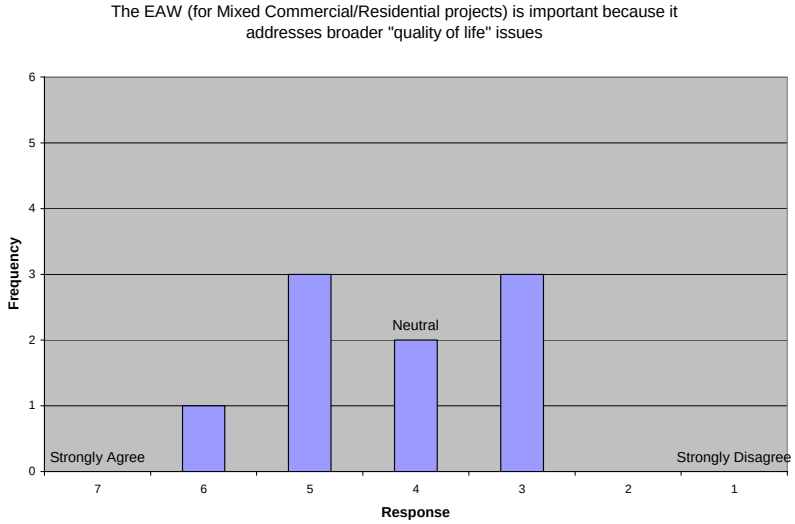
How well do you agree with the statement, “The EAW (for Mixed Commercial/ Residential projects) is a cost-effective way to help the proposer develop a final project design”?



Percentage Agreeing with Statement	44 %
Percentage Neutral	0 %
Percentage Disagreeing with Statement	56 %

Total responses: 9
Mean Score: 3.44

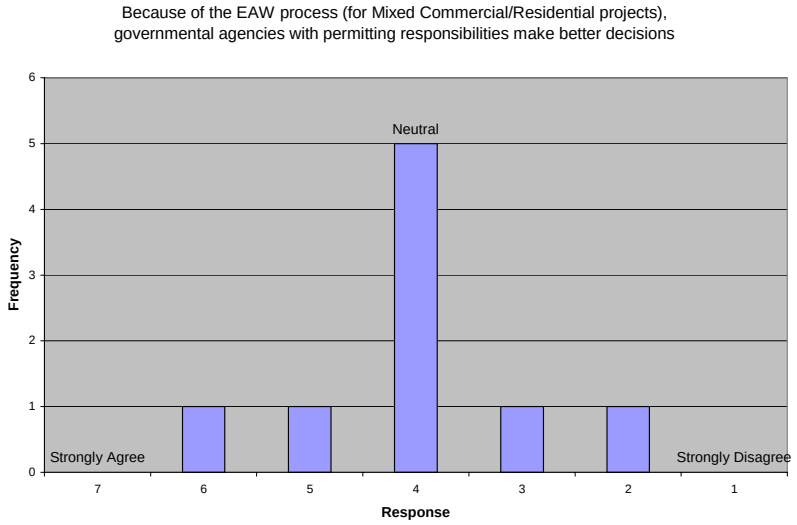
How well do you agree with the statement, “The EAW (for Mixed Commercial/ Residential projects) is important because it addresses broader "quality of life" issues”?



Percentage Agreeing with Statement	44 %
Percentage Neutral	22 %
Percentage Disagreeing with Statement	33 %

Total responses: 9
Mean Score: 4.22

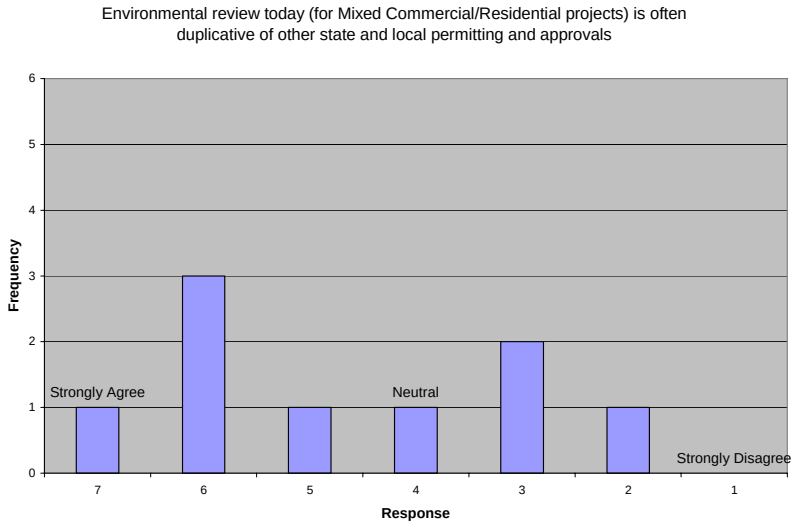
How well do you agree with the statement, "Because of the EAW process (for Mixed Commercial/ Residential projects), governmental agencies with permitting responsibilities make better decisions"?



Percentage Agreeing with Statement	22 %
Percentage Neutral	56 %
Percentage Disagreeing with Statement	22 %

Total responses: 9
Mean Score: 4.00

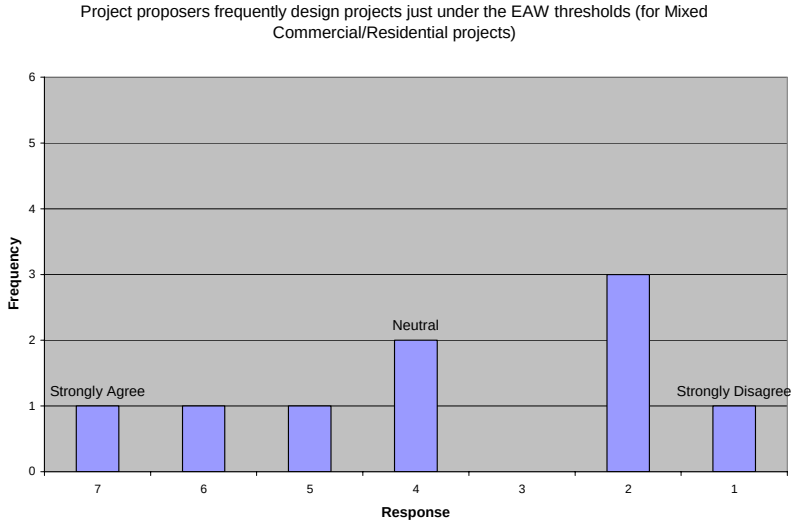
How well do you agree with the statement, "Environmental review today (for Mixed Commercial/ Residential projects) is often duplicative of other state and local permitting and approvals"?



Percentage Agreeing with Statement	56 %
Percentage Neutral	11 %
Percentage Disagreeing with Statement	33 %

Total responses: 9
Mean Score: 4.67

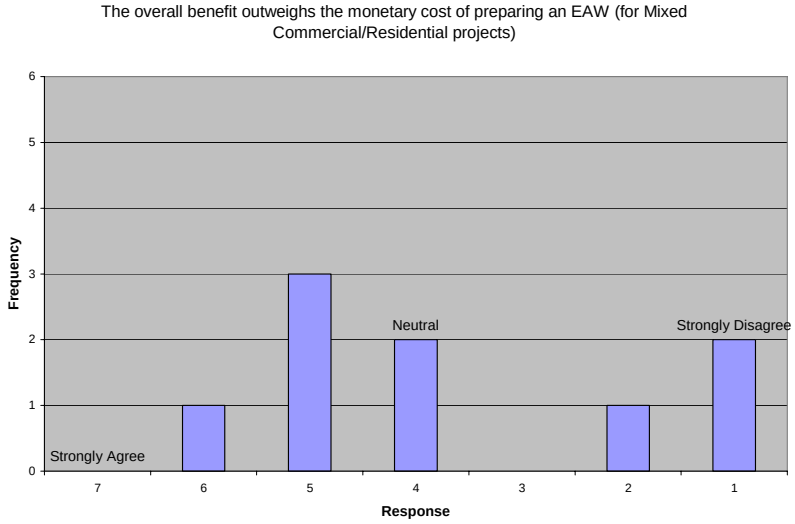
How well do you agree with the statement, "Project proposers frequently design projects just under the EAW thresholds (for Mixed Commercial/ Residential projects)"?



Percentage Agreeing with Statement	33 %
Percentage Neutral	22 %
Percentage Disagreeing with Statement	44 %

Total responses: 9
Mean Score: 3.67

How well do you agree with the statement, "The overall benefit outweighs the monetary cost of preparing an EAW (for Mixed Commercial/ Residential projects)"?



Percentage Agreeing with Statement	44 %
Percentage Neutral	22 %
Percentage Disagreeing with Statement	33 %

Total responses: 9
Mean Score: 3.67

Appendix I
HISTORICAL SURVEY RESULTS

6 Respondents Total

Background of the Respondents

RGU type:	5 Cities	(4 from cities of the 1st class, 1 from cities of the 3rd class)
	1 County	

Region:	5 from the Twin Cities Region	
	1 from the Southeast Region	

County:	3 from Ramsey County	1 from Hennepin County
	1 from Scott County	1 from Goodhue County

Responses to Survey Questions

How many EAWs have you been involved with preparing in the last 10 years?

Responses:	6		
Average:	9	Minimum:	4
Standard Deviation:	7.64	Maximum:	24

What is the number of EAWs your organization has been responsible for preparing in the Historical category during the years 2000-2003.

Responses:	5		
Average:	1.6	Minimum:	1
Standard Deviation:	.55	Maximum:	2

What is the number of EAWs your organization has been responsible for preparing in the all categories during the years 2000-2003.

Responses:	6		
Average:	6.83	Minimum:	2
Standard Deviation:	3.6	Maximum:	10

On average, how many weeks does it take your organization to process an EAW for the Historical category? ("Process means from the time you receive the complete data portions from the proposer, to the time a decision is made on the need for an environmental impact statement.)

Responses:	6		
Average:	10.83	Minimum:	6*
Standard Deviation:	4.12	Maximum:	18

** There were a couple of responses of 4 weeks or less. Since the minimum amount of time to process an EAW includes a 4 week public comment period, we assumed the respondents misinterpreted the word "process". For every response that was 4 weeks or less, an additional 4 weeks was added to make it consistent with the other responses.*

In your opinion, the EAW thresholds for the Historical Category should:

Choice	Count	Percentage Answered
Be lowered	0	0%
Stay the same	0	0%
Be raised	6	100%

What is the rationale for your recommendation?

Responses for raising the threshold:

- A non-contributing property in a historic district should not require review.

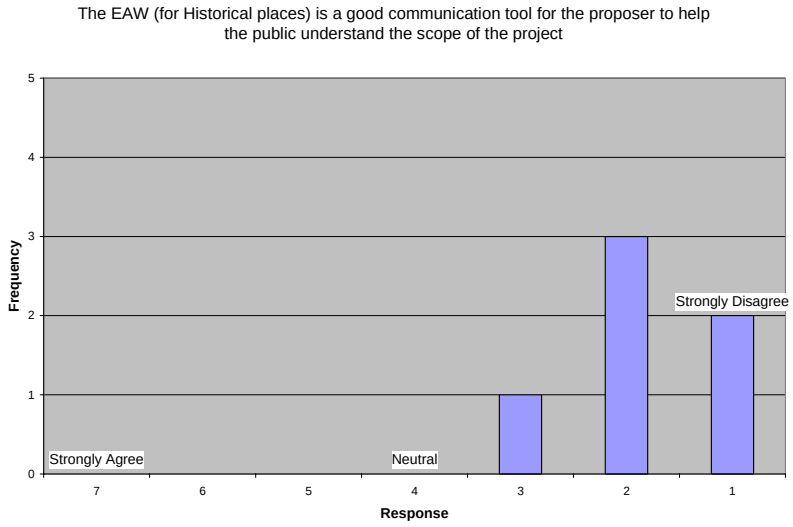
- Stone arch bridges that are less than 100 feet in length, unless they have some historical significance, other than their age, should not be considered for acceptance on the National Register. A small (20') stone arch railroad bridge crossing an intermittent stream should be considered the same as the Stone Arch Bridge crossing the Mississippi River by the St. Anthony Falls in Downtown Mpls. OR if they are eligible to be listed, then they should be ranked/rated as to public value, uniqueness, etc. and given a monetary values ($20,000, etc.).
- I believe this category should be discretionary, both for structures within an historic district and individually listed structures because most of the EAW questions are not applicable to this situation. For cities with a heritage preservation commission, there is adequate oversight.
- The RGU should have more discretion on a case-by-case basis. Remodeling a single family home, for example, should not require an EAW.
- Discretionary for non-contributing buildings within a district. In fact, EAW not appropriate process to do historic impacts.

If you believe the thresholds should be raised or lowered, what is your best estimate of an improved threshold number?

Responses for raising the threshold:

- Threshold for bridges should be tied to Public Value/Public Safety, etc. Estimaed value of over $200,000 or a cost/benefit analysis.
- No EAW requirement for cities with an HPC.

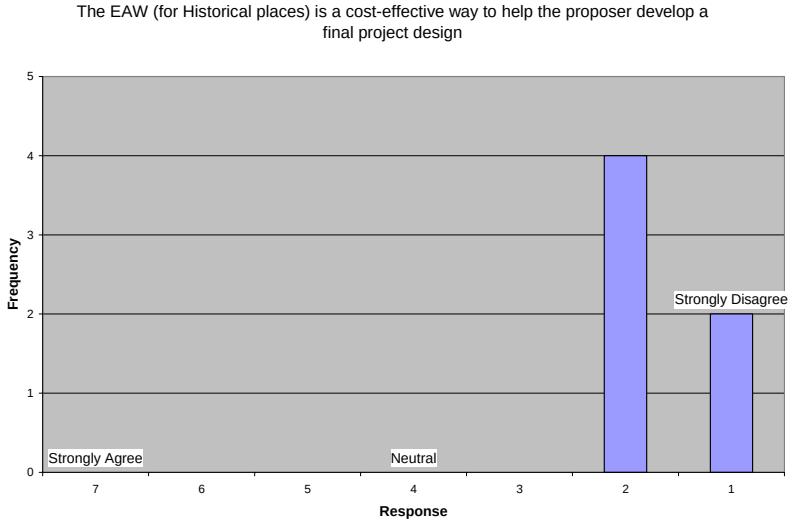
How well do you agree with the statement, "The EAW (for Historical projects) is a good communication tool for the proposer to help the public understand the scope of the project"?



Percentage Agreeing with Statement	0 %
Percentage Neutral	0 %
Percentage Disagreeing with Statement	100 %

Total responses: 6
Mean Score: 1.83

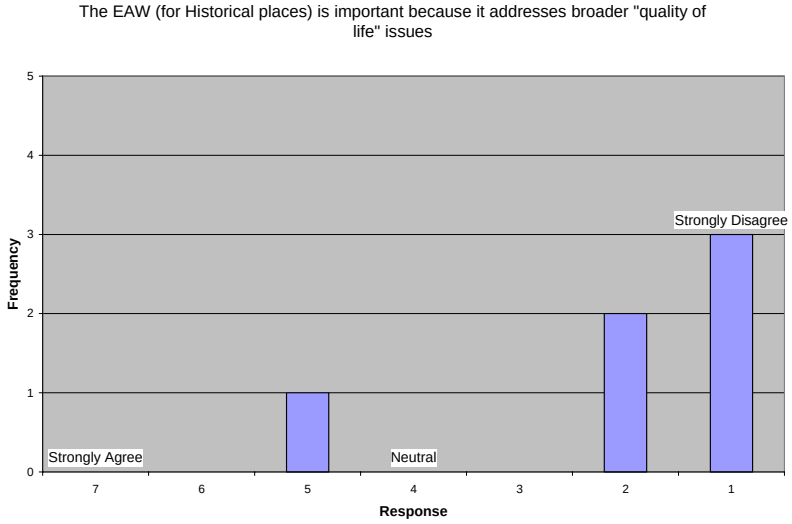
How well do you agree with the statement, “The EAW (for Historical projects) is a cost-effective way to help the proposer develop a final project design”?



Percentage Agreeing with Statement	0 %
Percentage Neutral	0 %
Percentage Disagreeing with Statement	100 %

Total responses: 6
Mean Score: 1.67

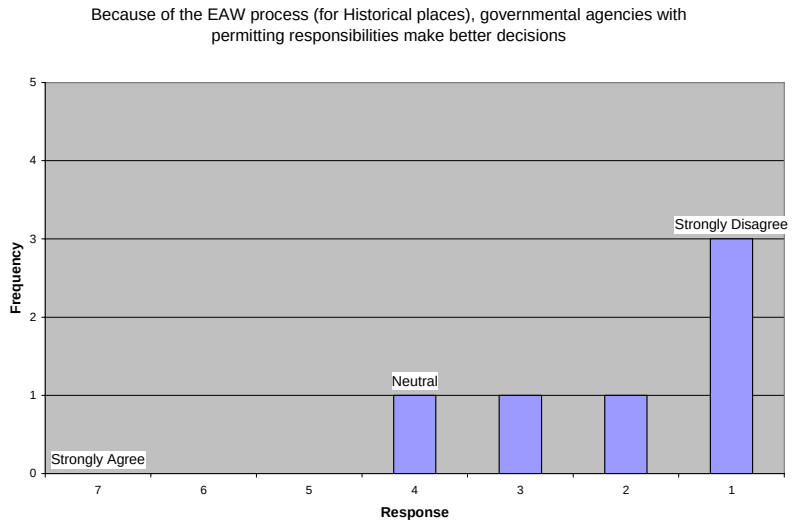
How well do you agree with the statement, “The EAW (for Historical projects) is important because it addresses broader "quality of life" issues”?



Percentage Agreeing with Statement	17 %
Percentage Neutral	0 %
Percentage Disagreeing with Statement	83 %

Total responses: 6
Mean Score: 2.00

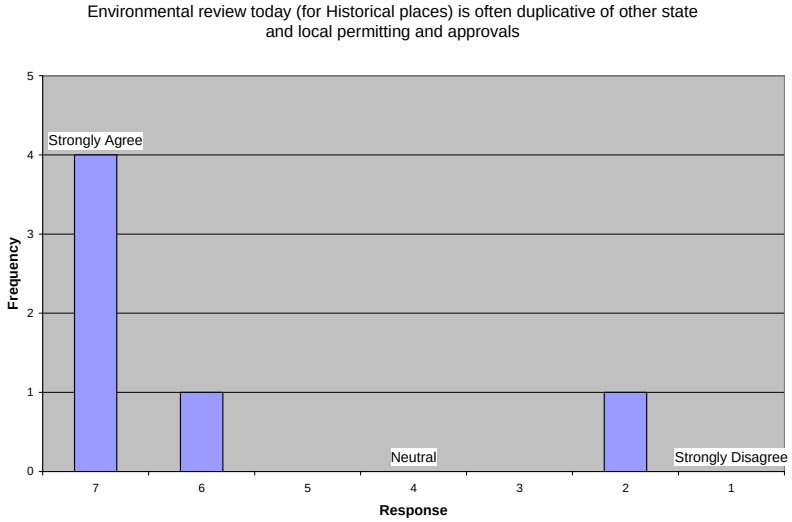
How well do you agree with the statement, "Because of the EAW process (for Historical projects), governmental agencies with permitting responsibilities make better decisions"?



Percentage Agreeing with Statement	0 %
Percentage Neutral	17 %
Percentage Disagreeing with Statement	83 %

Total responses: 6
Mean Score: 2.00

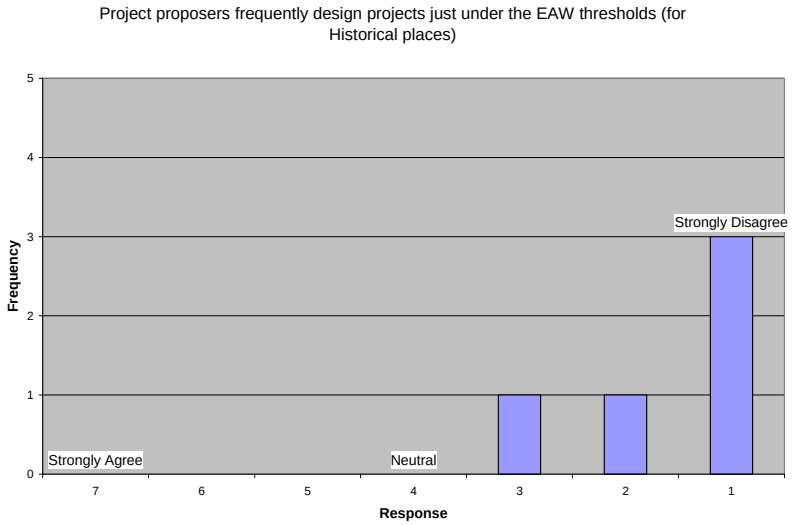
How well do you agree with the statement, "Environmental review today (for Historical projects) is often duplicative of other state and local permitting and approvals"?



Percentage Agreeing with Statement	83 %
Percentage Neutral	0 %
Percentage Disagreeing with Statement	17 %

Total responses: 6
Mean Score: 6.00

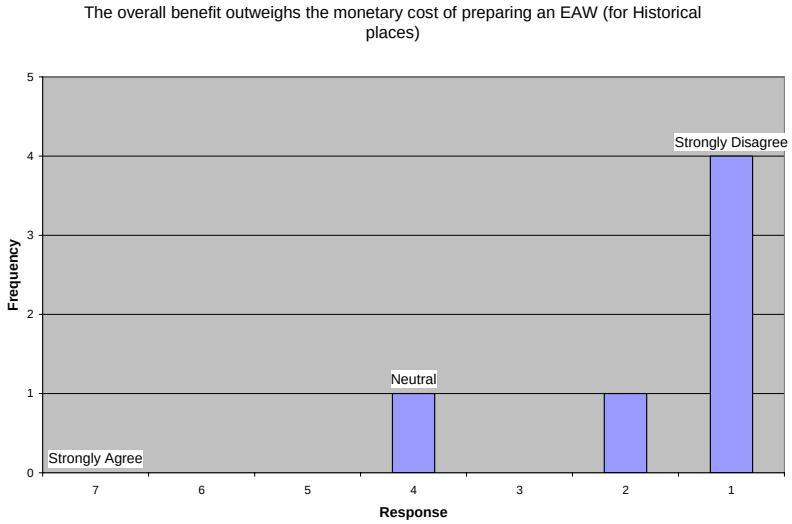
How well do you agree with the statement, “Project proposers frequently design projects just under the EAW thresholds (for Historical projects)”?



Percentage Agreeing with Statement	0 %
Percentage Neutral	0 %
Percentage Disagreeing with Statement	100 %

Total responses: 5
Mean Score: 1.6

How well do you agree with the statement, “The overall benefit outweighs the monetary cost of preparing an EAW (for Historical projects)”?



Percentage Agreeing with Statement	0 %
Percentage Neutral	17 %
Percentage Disagreeing with Statement	83 %

Total responses: 6
Mean Score: 1.67

Appendix J
COMPARING THE CATEGORIES

Background Information From Respondents

	All Categories	Residential	Industrial	Mining	Land-Use	Highways	Mixed	Historical
On average, how long does it take your organization to process an EAW (for this category)?	10.1	9.7	10.5	10.09	9.9	11.13	9.63	10.83
Percentage of respondents from cities	59	61	90	38	42	33	77	83
Percentage of respondents from counties	31	28	10	62	50	44	11	17
Percentage of respondents from consulting agencies	5	7	0	0	8	22	11	0
Percentage of respondents from townships	2	2	0	0	0	0	0	0
Total number of respondents	61	42	21	13	12	9	9	6

Respondents' Recommendations for the Mandatory Thresholds

	All Categories	Residential	Industrial	Mining	Land-Use	Highways	Mixed	Historical
Percentage of respondents recommending the threshold should "Be Lowered"	10	12	10	38	0	0	0	0
Percentage of respondents recommending the threshold should "Stay the Same"	63	63	80	54	75	66	67	0
Percentage of respondents recommending the threshold should "Be Raised"	26	24	10	8	25	33	33	100

Comparing Average Scores for the Strongly Agree/Disagree Questions

Respondents for each category were asked to rate whether they strongly agreed or disagreed with each statement based on a 7-point scale. (7 = strongly agree 4 = neutral 1 = strongly disagree) Mean scores are shown below.

	Residential	Industrial	Mining	Land-Use	Highways	Mixed	Historical
The EAW (for this category) is a good communication tool for the proposer to help the public understand the scope of the project	4.36	4.67	5.31	4.67	3.89	3.56	1.83
The EAW (for this category) is a cost-effective way to help the proposer develop a final project design	4.55	4.38	5.31	4.25	4.11	3.44	1.67
The EAW (for this category) is important because it addresses broader "quality of life" issues	4.62	4.48	5.31	4.27	3.00	4.22	2.00
Because of the EAW process (for this category), governmental agencies with permitting responsibilities make better decisions	4.79	5.10	5.46	4.50	3.22	4.00	2.00
Environmental review today (for this category) is often duplicative of other state and local permitting and approvals	4.22	3.85	4.00	4.17	4.87	4.67	6.00
Project proposers frequently design projects just under the EAW thresholds (for this category)	4.45	3.78	5.67	4.46	2.25	3.67	1.60
The overall benefit outweighs the monetary cost of preparing an EAW (for this category)	4.73	4.81	5.72	4.17	3.56	3.44	1.67

Percentage of Respondents Agreeing/Disagreeing with Each Statement

Respondents for each category were asked to rate whether they strongly agreed or disagreed with each statement based on a 7-point scale. (7 = strongly agree 4 = neutral 1 = strongly disagree) Percentages of agreeing/disagreeing respondents are shown below. All of the responses of 5, 6, and 7 were coded as agree and all of the responses of 1, 2, and 3 were coded as disagree. The percentage of neutral scores is not shown.

	Residential	Industrial	Mining	Land-Use	Highways	Mixed	Historical
The EAW (for this category) is a good communication tool for the proposer to help the public understand the scope of the project	57 -Agree 31 -Disagree	67 -Agree 24 -Disagree	85 - Agree 8 -Disagree	50 -Agree 25 -Disagree	56 -Agree 44 -Disagree	44 -Agree 33 -Disagree	0 -Agree 100-Disagree
The EAW (for this category) is a cost-effective way to help the proposer develop a final project design	50 -Agree 26 -Disagree	38 -Agree 26 -Disagree	69 -Agree 15 -Disagree	50 -Agree 25 -Disagree	44 -Agree 33 -Disagree	44 -Agree 56 -Disagree	0 -Agree 100-Disagree
The EAW (for this category) is important because it addresses broader "quality of life" issues	60 -Agree 29 -Disagree	52 -Agree 19 -Disagree	69 -Agree 8 -Disagree	55 -Agree 46 -Disagree	33 -Agree 56 -Disagree	44 -Agree 33 -Disagree	17 -Agree 83 -Disagree
Because of the EAW process (for this category), governmental agencies with permitting responsibilities make better decisions	71 -Agree 24 -Disagree	71 -Agree 5 -Disagree	92 -Agree 0 -Disagree	58 -Agree 17 -Disagree	22 -Agree 67 -Disagree	22 -Agree 22 -Disagree	0 -Agree 83 -Disagree
Environmental review today (for this category) is often duplicative of other state and local permitting and approvals	45 -Agree 33 -Disagree	40 -Agree 45 -Disagree	33 -Agree 42 -Disagree	33 -Agree 50 -Disagree	63 -Agree 38 -Disagree	56 -Agree 33 -Disagree	83 -Agree 17 -Disagree
Project proposers frequently design projects just under the EAW thresholds (for this category)	56 -Agree 39 -Disagree	33 -Agree 44 -Disagree	73 -Agree 9 -Disagree	55 -Agree 27 -Disagree	0 -Agree 88 -Disagree	33 -Agree 44 -Disagree	0 -Agree 100-Disagree
The overall benefit outweighs the monetary cost of preparing an EAW (for this category)	55 -Agree 23 -Disagree	62 -Agree 19 -Disagree	85 -Agree 8 -Disagree	59 -Agree 25 -Disagree	44 -Agree 33 -Disagree	44 -Agree 33 -Disagree	0 -Agree 83 -Disagree

Appendix K
DNR DATABASE INFORMATION

Type and Number of EAWs (2000-2003); Arranged by Activity Level
Gathered from the DNR Database in February 2004

4410.4300, subpart	EAW Mandatory Category	RGU	4-year total	% of total
36	Land Use Conversion, including Golf Courses	LGU	**97**	**17.0**
19	Residential Developments	LGU	**86**	**15.1**
14	Industrial, Commercial, and Institutional Facilities	LGU	**58**	**10.2**
18	Wastewater Treatment Systems	PCA	**56**	**9.8**
22	Highway Projects	DOT, LGU	**53**	**9.3**
32	Mixed Residential Industrial-Commercial Projects	LGU	**39**	**6.8**
12	Nonmetallic Mineral Mining	DNR, LGU	**34**	**6.0**
29	Animal Feedlots	PCA, LGU	**29**	**5.1**
27	Wetlands and Protected Waters	LGU	**24**	**4.2**
17	Solid Waste	PCA	**18**	**3.2**
15	Air Pollution	PCA	**12**	**2.1**
31	Historical Places	LGU	**10**	**1.8**
20	Campgrounds and RV Parks	LGU	**9**	**1.6**
3	Electric Generating Facilities	EQB	**8**	**1.4**
5	Fuel Conversion Facilities	PCA	**8**	**1.4**
25	Marinas	LGU	**5**	**0.9**
	Discretionary - ATV Trail, oil bulk plant -02, temporary hot mix aspalt plant -01, residential on lakeshore (2) - 00		**5**	**0.9**
21	Airport Projects	MAC, LGU	**4**	**0.7**
33	Communication Towers	LGU	**4**	**0.7**
34	Sports and Entertainment Facilities	LGU	**3**	**0.5**
10	Storage Facilities	PCA	**2**	**0.4**
24	Water Appropriation and Impoundments	DNR	**2**	**0.4**
26	Stream Diversion	LGU	**2**	**0.4**
30	Natural Areas	DNR, LGU	**1**	**0.2**
	Voluntary - 400 au swine nursery (proposer has 2 - 4800 head feedlot on same property		**1**	**0.2**
2	Nuclear Fuels and Nuclear Waste	EQB, MDH	**0**	**0.0**
4	Petroleum Refineries	PCA	**0**	**0.0**
6	Transmission Lines	EQB, LGU	**0**	**0.0**
7	Pipelines	EQB	**0**	**0.0**
8	Transfer Facilities	PCA	**0**	**0.0**
9	Underground Storage	DNR	**0**	**0.0**
11	Metallic Mineral Mining and Processing	DNR	**0**	**0.0**
13	Paper or Pulp Processing Mills	PCA	**0**	**0.0**
16	Hazardous Waste	PCA	**0**	**0.0**
23	Barge Fleeting	DOT, PA	**0**	**0.0**
28	Forestry	DNR	**0**	**0.0**
35	Release of Genetically Engineered Organisms	EQB	**0**	**0.0**
	TOTAL		**570**	**100.0**

Note: These numbers are in contrast somewhat to the data gathered from the survey. The DNR's database did not indicate the mandatory categories for the projects; it only provided basic project information and a project description. From this data it was necessary to hypothesize which categories these projects belonged to. For example, any project over 80 acres in size would have been considered in the land-use conversion category. When participants were indicating their responses in the survey, they may not have distinguished projects over 80 acres as a part of the land-use conversion category. They may have marked any residential development project as "residential", regardless of its size.