39398 Minnesota Pollution Control Agency Request for Comments on Cumulative Impacts Rule

Closed Oct 06, 2023 · Discussion · 50 Participants · 1 Topics · 54 Answers · 0 Replies · 2 Votes

50	1	54	0	2
PARTICIPANTS	TOPICS	ANSWERS	REPLIES	VOTES

SUMMARY OF TOPICS

SUBMIT A COMMENT

54 Answers · 0 Replies

Important: All comments will be made available to the public. Please only submit information that you wish to make available publicly. The Office of Administrative Hearings does not edit or delete submissions that include personal information. We reserve the right to remove any comments we deem offensive, intimidating, belligerent, harassing, or bullying, or that contain any other inappropriate or aggressive behavior without prior notification.

Daniel Pr · Citizen · (Postal Code: unknown) · Aug 15, 2023 2:56 pm

0 Votes

The goal of this initiative is to help people who have been "disproportionately" exposed to harmful pollution by establishing "environmental justice" areas?
But looking at your Twin Cities map, practically the entire metro area has been marked. So disproportionate compared to what non-marked area? The farmland away from the metro?

I thought we already had an environmental review process for new construction and EPA standards for exposure limits. These federal standards are data-driven, objective, and equitable. It is unclear what gaps exist and what real harm is being done to citizens here.

Is the state now going to interfere in city and county urban planning to inject a partisan agenda? What other reason could this initiative serve?

If the goal is to help people in at-risk neighborhoods, why is nearly the entire Twin Cities metro area highlighted rather than a few areas to focus on? It seems the scope of this initiative is unclear, too broad, and full of posturing without any substance.

Define a clear scope, focus on at-risk individuals, and explain what gaps in current legislative restrictions on pollution exist that are causing harm to people. This seems like a solution in search of a problem.

Brad Haney · Citizen · (Postal Code: unknown) · Sep 17, 2023 11:50 am

0 Votes

Industrial pollution is an important problem to consider, but we also need to look at residential pollution. In my neighborhood at any day of the week at any given time there are several recreational “campfires” burning. There is a preponderance of evidence showing that wood smoke pollution is extremely harmful, and even more polluting than some fossil fuels. During these times of constant wildfire smoke reaching our state we need to implement laws restricting burning on days of increased PM2.5 pollution. We also need to take a look at the health effects of these “campfires” and consider whether they should be restricted on clean air days as well to preserve the cardiovascular health of the people that don’t want to be exposed to it.

Matthew Young · Citizen · (Postal Code: unknown) · Sep 25, 2023 12:29 pm

0 Votes

First, I would like to commend the MPCA and our Minnesota Legislature for finally drafting legislation that begins to substantively address the concerns of environmental justice in Minnesota's communities.

Second, I wanted to inquire if alongside the rulemaking process for the Cumulative Impacts Rule, are there plans to dedicate resources (e.g. human, financial, and technical resources) towards integrating data and analysis from the U.S. Environmental Protection Agency's EJScreen platform at https://ejscreen.epa.gov/mapper/(?) The integration of EJScreen content alongside encouraging citizen science initiatives across "Environmental Justice Areas" could greatly inform areas of accountability, areas of investment, and areas for policy incubation shaped by grassroots input. Thank you and I look forward to monitoring how the Cumulative Impacts Rule becomes implemented!

Maggie Wenger · Citizen · (Postal Code: unknown) · Sep 28, 2023 8:54 am

0 Votes

The MPCA collected written comments at public meetings in September 2023. Those comments are attached in two PDFs here. Note, zero comments were collected at the Rochester meeting on September 26th.

Meredith Cornett · Citizen · (Postal Code: unknown) · Sep 29, 2023 10:51 am

0 Votes

The Cumulative Impacts law is a great step forward for the state of Minnesota. The MPCA has now been entrusted with the responsibility of rulemaking. It is critical that the rulemaking process honors the intent of this historic law, which was backed by a diverse coalition: reduce pollution in overburdened environmental justice areas, increase transparency, and include residents in decision-making around facilities permitting.

Rulemaking must address existing pollution as well as preventing new pollution in environmental justice and frontline communities. To accomplish these goals, the process must prioritize the voices and lived experience of impacted communities. Engagement of communities of color and historically marginalized communities is not a strength of the MPCA, who should contract with local, grassroots community partners in each of the three geographies to lead community participation. Community leadership should be local, and community leaders must be fairly compensated for their time and expertise.

Rules generated by process must center environmental justice and anti-racism values to achieve the law's intent. That means:
- Make cumulative impacts analyses understandable (plain language) and accessible to community members.
- Create clear guidelines for decision-making under the law, specifying the central role of impacted environmental justice and frontline communities in permitting decisions.
- Establish an inclusive, transparent process that empowers local, impacted neighborhoods in approving or denying every "community benefit agreement."

For rulemaking to be meaningful, the MPCA and local partners who are also community members, must collaborate in a transparent way, ensuring the following:
- Ensure that everyone understands the background and intent of the law itself and what it says in plain language (consider bringing in some of the coalition members or bill sponsors for this piece) and that they know where to look it up for reference https://www.revisor.mn.gov/bills/text.php?number=SF466&version=latest&session=ls93&session_year=2023&session_number=0
- Ensure adequate access, such as holding meetings locally, getting the word out in the way that works best for each community, offering meals (at a minimum) during meetings (preferably offer child care and a stipend, etc.)
- Treat all participants with respect and ensure equitable standing—remember you need local expertise and lived experience to have meaningful participation
- Follow through on incorporating comments and feedback from local participants
- Be transparent about who is engaged – both inside and outside the agency (e.g., participant lists, roles, etc.)

I will be following this process with an eye toward the above priorities. Thank you for your consideration of these comments.

Elijah Renn · Citizen · (Postal Code: unknown) · Sep 29, 2023 9:12 pm
0 Votes

I would love an official notification and an opportunity to be heard if any polluting entity was to apply to enter my neighborhood. Thank you for letting us comment.

Akira Yano · Citizen · (Postal Code: unknown) · Sep 30, 2023 5:30 pm
0 Votes

This rulemaking must center on anti-racism and environmental justice to lower pollution levels for impacted communities. This means the MPCA, together with community members, must collaboratively and transparently create these rules.

One critical, and meaningful step to doing so is to ensure adequate access, so there are no barriers to participation. For example, not making people create an entire account just so they can comment on things such as this Cumulative Impacts Rulemaking process. There is also zero support as far as I can see for non-English speakers to participate in this.

Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the

cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable

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Brenden Renn · Citizen · (Postal Code: unknown) · Sep 30, 2023 9:45 pm

0 Votes

As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want you to engage the community in meaningful ways.

Equitable standing so people are treated fairly and with respect with valuable expertise to offer. Environmental justice is a hot topic. People are eager to have access to know-how and resources that give them the ability to be a leader in their community. Under the right circumstances, self governance is possible.

At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.

Ethan Perry · Citizen · (Postal Code: unknown) · Oct 01, 2023 3:17 pm

0 Votes

I fully support the Cumulative Impacts law. It is critical that the rulemaking process honors the intent of the law: to reduce pollution in overburdened environmental justice areas, increase transparency, and include residents in decision-making around facilities permitting.

The rulemaking process must prioritize the voices and lived experience of impacted communities. The MPCA must contract with local, grassroots community partners in each of the three geographies to lead community participation. Community leadership should be local, and community leaders must be fairly compensated for their time and expertise.

The process must include: 1) treating all participants with respect and ensure equitable standing, 2) ensuring adequate access, such as holding meetings locally, getting the word out in the way that works best for each community, offering meals (at a minimum) during meetings (preferably offer child care and a stipend, etc.), 3) creating clear guidelines for decision-making under the law, specifying the central role of impacted environmental justice and frontline communities in permitting decisions, 4) making cumulative impacts analyses understandable (plain language) and accessible to community members, 5) establishing an inclusive, transparent process that empowers local, impacted neighborhoods in approving or denying every "community benefit agreement," 6) being transparent about who is engaged – both inside and outside the agency (e.g., participant lists, roles, etc.), and 7) following through on incorporating comments and feedback from local participants.

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Rich Anthony · Citizen · (Postal Code: unknown) · Oct 03, 2023 4:25 pm
0 Votes

Why is rural "Greater Minnesota " not included in these protections? It is not ok to not protect us in grater Minnesota.

Chris McConn · Citizen · (Postal Code: unknown) · Oct 04, 2023 12:48 pm
0 Votes

Dear Ms. Izzo,

Please see attached letter with comments.

Sincerely,
Chris McConn

Brinsley Davis · Citizen · (Postal Code: unknown) · Oct 04, 2023 2:07 pm
0 Votes

I am in support of the cumulative impacts rule. As stated in other comments, I think it is critical to reach out to neighborhoods impacted the most by cumulative effects of pollution. These frontline communities in the past have been asked for their opinions, and then had those opinions ignored by the government agency making decisions. Please engage in direct communication in all stages of this process: when drafting ideas and proposals, when gathering input on proposals, and then when making decisions about proposals. Often the community is only part of the middle stage, and can feel like they are ignored in the initial and final stages.

Lucia Zuvela · Citizen · (Postal Code: unknown) · Oct 04, 2023 4:19 pm
0 Votes

First of all, this is a great initiative to address environmental justice in Minnesota, something essential to revert the causes of historial structural violence that grew from redlining and neighborhoods segregation. I am excited to see how this is applied in the near future to advance equality and support a better and safer place for everyone to live.

I do also really appreciate the component of public participation for the process of law making which has always been determined as a closed space for the experts whereas it may not reflect daily life experiences of people. Regarding this, my concern is that in further stages of participation community voices may become weaker since they would have to rely on the interests of those facilities as these could represent their source of income. Then, how do we address structurally this relationship between being exposed to pollutants and income? Is someone that has preoccupations such as lack of income be able to think and defend environmental issues first? There should be a way to provide different pathways to support people of these communities at the time of addressing facilities permitting to assure this law is not impacting them negatively and, where they are not in a place of deciding between money or health when talking but rather

defending to not having to face any of them.

Another point that I want to make in order to promote inclusive public participation is to work closely with translators or with having information available in many languages since the minority community represented is in some part characterized by language barriers and they may feel more comfortable to engage in this way.

Lastly, I am wondering what would be asked of these facilities when the cumulative analysis is made. Will it need to be closed? Moved to another property? Or is it working closely with them to reduce the emission of pollutants? (The last one may be the most practical but the most prone to be weakened). I know this is the complex question at the time of making a law, and I do feel that it would be interesting to take as a reference the examples of the Environmental Impact Assessments (EIA) or Environmental Assessment Worksheet (EAW) to see what is already not working or what are some common issues these face already to not commit similar mistakes.

Thanks for hearing! I will keep following this law process closely!

Heidi Nybroten · Citizen · (Postal Code: unknown) · Oct 04, 2023 5:49 pm

0 Votes

The rulemaking must center on anti-racism and environmental justice to lower pollution levels for impacted communities. This means the MPCA, together with community members, must collaboratively and transparently create these rules. There should be no barriers to participation - this means MPCA needs to go to where the community is in order to hear their voice. MPCA should provide meals or childcare or stipends for folks who are informing your process but may have barriers to having their voice heard by you all. This should also include translators and other accessibility needs. MPCA needs to value peoples' time and what they are sacrificing in order to have their voices heard.

MPCA has a tremendous responsibility to community and taking on this process and attempting to make decisions in the best interests of directly impacted communities. There should be check-ins and opportunities for feedback at every step of this process. There should be transparency with who is making decisions and how those decisions are landed on. This cumulative impacts analysis and rulemaking should be easily accessible for folks - how can you disseminate this information in accessible ways?

Community Benefit Agreements are dangerous. It feels like a way to just get around this process of engaging with the impacted communities and letting the MPCA just make decisions for us. What are the accountability measures for this process? Communities should have a process for approving or denying a CBA. There needs to be ways for communities to hold the MPCA accountable for the decisions they are making for people. The MPCA should not be allowed to make back door deals with developers to bypass the permit process.

Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law- for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but it could be a good first step if it indeed creates stronger rules that center community participation, empowerment, and environmental justice. I will be following this process and holding MPCA accountable to the decisions it makes.

Sharon Mansur · Citizen · (Postal Code: unknown) · Oct 05, 2023 9:04 am

0 Votes

Regarding this proposed Cumulative Impacts Bill, where does Greater Minnesota fit in? It's essential to include and protect us as well. This absence is concerning and needs to be addressed.

With regards to environmental justice, echoing some comments above, having this information available in multiple languages, more accessible plain language, easier access to comment, and in depth outreach are a minimum baseline to prioritize inclusive community engagement.
First Nations communities should also be prioritized.

James Johnson · Citizen · (Postal Code: unknown) · Oct 05, 2023 10:31 am

0 Votes

My comments (shown below the row of asterisks) are directed toward the below portions of CHAPTER 60--H.F.No. 2310:

Sec. 3. [116.065] CUMULATIVE IMPACTS ANALYSIS; PERMIT DECISIONS IN ENVIRONMENTAL JUSTICE AREAS

Subdivision 1.
(c) "Cumulative impacts" means the impacts of aggregated levels of past and current air, water, and land pollution in a defined geographic area to which current residents are exposed.

(f) "Environmental stressors" means factors that may make residents of an environmental justice area susceptible to harm from exposure to pollutants. Environmental stressors include:

(1) environmental effects on health from exposure to past and current pollutants in the environmental justice area, including any biomonitoring data from residents reported through the Centers for Disease Control, the Department of Health, or peer-reviewed scientific or medical articles; and

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COMMENTS:

I suggest that MPCA should consider *noise* as an additional environmental stressor, and should consider repeated intermittent loud noises, for example from insufficiently muffled motor vehicles, as a contributor to cumulative impacts.

A growing body of high-quality scientific evidence documents significant adverse physical and mental health effects from intermittent loud noises, such as from cars with modified exhaust systems, especially when they are operated in manner (e.g., aggressive driving or high-rev idling) that results in excessive noise production.

Given the demographics and typical local roadway characteristics of Environmental Justice Areas, residents may be at especially high risk for chronic exposure to

intermittent excessive vehicle noise.

Current statutes do not clearly address intermittent – as opposed to continuous – excessive noise production, but this is growing problem that has demonstrable adverse public health effects and calls out for effective interventions. Contributing to the challenge is that the source is typically not a single emitter but a host of different emitters that vary continuously over space and time, creating a moving target. Creative, enforceable, explicit standards are needed for use at all steps in the process, including prevention, remediation, and enforcement.

AMY WESTBROOK · Citizen · (Postal Code: unknown) · Oct 05, 2023 10:32 am

0 Votes

Thank you for the opportunity to offer comment in-person as well as on-line. This is an important issue to the health of communities and the Cumulative Impact Law is certainly a positive step towards environmental justice.
The MPCA could consider working in partnership with the MN public health system in these early decisions of rulemaking as well as through the agreement-making process.
The health risks that the MPCA could consider including within the cumulative impacts analysis and assessing through agreements are: current fine particle pollution and ground level ozone levels; asthma ED visits among children and adults; hospitalizations related to respiratory illnesses and hospitalizations due to cardiovascular disease. These factors would be per residents of zip codes that could be potentially impacted, or as geographically specific as possible. The health factors could be monitored and inform the company's practices and the community benefit agreements on an ongoing basis. Acceptable thresholds could be established with defined implications if exceeded over a defined period of time or frequency.
The rule-making process could require that an Organizational Health Equity checklist be completed for each community benefit agreement (an example of such checklist is attached). Codifying this into the agreement-making process will assist the MPCA in assuring that impacted communities are inherently involved in the process and that the MPCA is taking a health-in-all-policies approach to these processes.
I would also suggest that the local health department be consulted in developing and reviewing the community benefit agreement to assure a health equity lens.
The community benefit agreement-making process would benefit greatly from a public comment process. The process could be available locally, accessible through multiple methods, publicized widely and provide adequate time for feedback.

Ann Benrud · Citizen · (Postal Code: unknown) · Oct 05, 2023 12:27 pm

1 Votes

As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want you to make certain that the communication efforts surrounding this stage of development are accessible to the broadest number of people from varying lifestyles, socio-economic levels, and cultures. Language access is important. Reading levels for communication content are important. Where and how is key communication being distributed? I have seen nothing about this important law until I was informed by a relative. Ways to improve awareness could include social media campaigns, targeted efforts via Nextdoor, Facebook neighborhood groups, neighborhood newspapers, direct mail and more.

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Betty Winkworth · Citizen · (Postal Code: unknown) · Oct 05, 2023 12:32 pm
0 Votes

I would like to agree with former comments that question the wisdom of limiting the Cumulative Impact Act to Rochester, Duluth and the 7 counties in the Twin Cities.

In Mankato we have a current concern with the effects of the emissions from Xcel's Wilmarth Waste to Energy facility and submitted a comment to the MPCA prior to the re-issuance of its air permit. According to 2021 data from Tableau Public Wilmarth produced over one million pounds of Nitrogen Oxide (NOX) compared to 805,800 pounds emitted by the larger HERC in Hennepin County. It also had sulfur dioxide and carbon monoxide levels that were double those at HERC. Some changes were made to its reissued permit by the MPCA but never with the consideration of the cumulative impact of Wilmarth, plus nearby Mankato Energy Center and Archer Daniel Midlands. These 3 facilities together produced 95% of the NOX for the 26 air permits in Mankato in 2021. Yet there is no recourse for this cumulative damage to the air quality and health effects on nearby Germania Park which is a verified EJ area in Mankato. And that will not change in the future as Wilmarth plans to extend its contract in order to expand its facility and capacity instead of closing at its retirement date of 12/31/27. The problem will only grow.
We need the Cumulative Impact Act to be amended at the next legislative session to cover cities like ours in Outstate Minnesota.

Rachel Wormer · Citizen · (Postal Code: unknown) · Oct 05, 2023 2:46 pm
0 Votes

Please see the attached PDF for twelve health professionals' individual comments compiled as one file. There is one comment per page. Thank you.

Tony Kwilas · Citizen · (Postal Code: unknown) · Oct 05, 2023 3:37 pm
0 Votes

Please find the comments from the Minnesota Chamber of Commerce attached

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Chuck Picard · Citizen · (Postal Code: unknown) · Oct 05, 2023 4:19 pm
0 Votes

The citizens of all of MN need to have standards laid out for the measurement of Impulsive Noise. There are no standards on the books and this is causing or could cause great harm to people living near outdoor pickleball facilities. The sport of pickleball produces large quantities of impulsive noise on a daily basis. Tax paying citizens in communities across the state are left with no remedies to stop the intrusive and nuisance noises. Repeated exposure to impulsive noises can lead to many health issues. Just to put this in perspective - one hit or "pop" from a ball on paddle can register at or above 70 decibels. Just one court, with 4 people playing for one hour can produce 1,200 of these pops. There are 6 courts that are 62 feet from my property line. That means they are producing 7,200 pops per hour. The courts are open from 9:00 AM to 8:00 PM, 7 days a week. That is 79,200 pops per day. Not all pops will exceed 70 decibels, BUT

they are still clearly audible. The ambient noise level at my house is 41 decibels. This is a huge leap when pickleball starts each day. Local governments are relying on the state for guidance because there is a lot of science involved. Home owners are left with nothing except taking an expensive gamble that the legal system will hear their case and rule in their favor. This is a simple noise issue that MPCA can help solve with simple standards.

Elizabeth Wefel · Citizen · (Postal Code: unknown) · Oct 05, 2023 9:16 pm

0 Votes

Attached please find comments from the Coalition of Greater Minnesota Cities.

Amy Gutierrez Carrillo · Citizen · (Postal Code: unknown) · Oct 06, 2023 1:28 am

0 Votes

Yo apoyo esta pieza de legislacion, pero siento que la accumulacion de contaminantes en un solo vecindario nunca tuvo que haber sido un problema. Yo hasta ahora confiaba en el gobierno para protegerme de contaminantes than dañinos como los que emiten muchas de estas instalaciones. Es inhumano que grupos de escasos recursos y comunidades de color tengan que pelear por nuesta proteccion cuando muchos vecindarios con dinero y poder no tengan que preocuparse por la contaminacion en donde viven. Tantos años y esfuerzo tuvo que ser dedicado para que pasaran esta ley que es proteccion tan basica. Es lamentable que el dinero de algunos valga más que las personas. Esto es racismo ambiental. Tiene que haber algun tipo de compensacion para las comunidades que han sido afectadas. Los que ya han muerto a causa de la contaminacion emitida no pueden regresar pero los que siguen viviendo tienen que almenos ver el cambio en su salud.

Esta ley es solo el primer paso hacia un futuro mejor para mi familia y mi comunidad. Ahora es muy importante que incluyan a las personas afectadas en el proceso de implementacion para que puedan hacerlo con consentimiento y que transparencia. Apesar de que exista esta ley, historicamente las empresas contaminantes encuentran otras avenidas para seguir contaminando en nuestros vecindarios, y eso tiene que cambiar. Los acuerdo de beneficio comunitario tienen que ser aprobados por las comunidades afectadas.

Shalini Gupta · Citizen · (Postal Code: unknown) · Oct 06, 2023 9:11 am

0 Votes

Please find attached the comments of Community Members for Environmental Justice (CMEJ).

Jonathan Cox · Citizen · (Postal Code: unknown) · Oct 06, 2023 9:58 am

0 Votes

Attached are ME Global's comments.

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John Howard · Citizen · (Postal Code: unknown) · Oct 06, 2023 10:30 am
0 Votes

Attached is a comment letter prepared by the City of Winona's Citizens Environmental Quality Committee.

Melissa Weglarz · Citizen · (Postal Code: unknown) · Oct 06, 2023 11:37 am
0 Votes

Attached are comments from ALLETE/Minnesota Power.

Kathleen Schuler · Citizen · (Postal Code: unknown) · Oct 06, 2023 11:55 am
0 Votes

Health Professionals for a Healthy Climate is submitting this comment letter on behalf of six health organizations.

Janiece Watts · Citizen · (Postal Code: unknown) · Oct 06, 2023 12:26 pm
0 Votes

Fresh Energy submits these comments on behalf of the Minnesotans who took action through Fresh Energy's action alert.

Alex Olin · Citizen · (Postal Code: unknown) · Oct 06, 2023 12:41 pm
0 Votes

Attached are comments from the Cemstone Companies.

Jeff Stollenwerk · Citizen · (Postal Code: unknown) · Oct 06, 2023 1:08 pm
0 Votes

Attached please find comments from the Duluth Seaway Port Authority.

Danny Ackert · Citizen · (Postal Code: unknown) · Oct 06, 2023 1:13 pm
0 Votes

Please find attached comments on behalf of the Minnesota Hospital Association.

Mike Karbo · Citizen · (Postal Code: unknown) · Oct 06, 2023 1:32 pm
0 Votes

Please find the comments from the American Petroleum Institute attached.

John Pollard · Citizen · (Postal Code: unknown) · Oct 06, 2023 1:51 pm
0 Votes

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Please find attached comments on behalf of the International Union of Operating Engineers Local 49 and the North Cental States Regional Council of Carpenters.

Carolina Ortiz · Citizen · (Postal Code: unknown) · Oct 06, 2023 1:52 pm
0 Votes

COPAL submits these comments collected from supporters of the Frontline Communities Protection Coalition.

Rachel Johnson · Citizen · (Postal Code: unknown) · Oct 06, 2023 2:00 pm
0 Votes

Please find attached comment letter on behalf of the Area Partnership for Economic Expansion (APEX), the Duluth Area Chamber of Commerce and the Range Association of Municipalities and Schools (RAMS). Thank you.

Sasha Lewis-Norelle · Citizen · (Postal Code: unknown) · Oct 06, 2023 2:20 pm
0 Votes

Submitting this letter on behalf of Clean Water Action Minnesota

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Hudson Kingston · Citizen · (Postal Code: unknown) · Oct 06, 2023 2:22 pm
0 Votes

Please see attached for the comment of CURE.

Sasha Lewis-Norelle · Citizen · (Postal Code: unknown) · Oct 06, 2023 2:40 pm
0 Votes

Please find attached the comment letter from the Frontline Communities Protection Coalition

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Tess Dornfeld · Citizen · (Postal Code: unknown) · Oct 06, 2023 2:51 pm
0 Votes

There is nothing more important to this rulemaking process than genuine, robust, and thorough engagement with the public and stakeholder communities to gather input and feedback ***which is then incorporated*** into the outcomes as a primary, priority component, and not simply set aside in favor of business as usual. If this were what had been done in past processes, we wouldn't now need a cumulative impacts law.

Genuine public engagement must prioritize access to the process in every sense, starting with proactive outreach through a variety of mediums, and consulting with community members, leaders, and trusted messengers to make use of the sources of information that are most reliable to reach residents in each community. That might mean radio announcements, newsletter bulletins, posters, partnering with local groups

for SMS or canvassing programs, or other means - not just using PCA's own email and social media and calling it good enough.

The opportunities to provide input themselves must also match what's most accessible for all communities, including options to provide oral input in person or by phone, and the collection of comments in different mediums by other groups to submit on behalf of their community residents. Virtual and in-person events must be provided at a variety of times and with multiple opportunities so that someone who has a conflict with the date or time of one will still have another chance to participate. Scheduling needs to be sensitive to communities, including those who work or have care duties during the day, in the evening, and on the weekend.

Finally, the engagement process must meaningfully and directly inform the rules that are produced - any efforts to gain robust comment and input will be severely undermined if the participation of community members and their efforts made to engage are not visible in the final product. This would have harmful consequences not just for this process, but for any future public engagement efforts and decisionmaking by the agency.

This is an unprecedented opportunity for PCA to build trust and relationships, and demonstrate that regulatory capture is not stronger than the public interest. It will require ways of doing things that may be new and different, but if taken seriously and done well, it can set a new precedent for prioritizing impacted communities and truly serving all the people of Minnesota.

Kris Acuna · Citizen · (Postal Code: unknown) · Oct 06, 2023 3:19 pm

0 Votes

I am a resident of Rochester and someone who has asthma and several family members with asthma, I've seen firsthand the impacts of unchecked air pollution on our community's health and well-being. It’s essential for our these rules to prioritize people and communities over corporate interests, especially given the harmful legacies of sidelining marginalized communities.

The cumulative impacts law offers a beacon of hope. But for it to be effective, the MPCA must ensure community participation, empowerment, and environmental justice are at the center.

The MPCA must conduct town hall meetings, ensuring they're held at timings convenient for working families, and utilize local community centers, schools, or places of worship.

The data from cumulative impact analyses should be readily available online in a user-friendly format. Additionally, workshops should be organized to help residents interpret this data.

Summaries of feedback provided by the public and how it's shaping the rulemaking process need to be available. Transparency is vital.

Engage local environmental groups and community leaders and groups. Their boots-on-

the-ground perspective is invaluable.

The heart of the cumulative impacts law lies in truly empowering marginalized communities. To create a lasting positive impact, these rules should be a collaborative effort that ensures genuine community involvement.

The rules also need to allow for a community to reject a community benefit agreement if they find it insufficient, and new developments or projects not be allowed if the community rejects the community benefit agreement.

I implore the MPCA to rise to this occasion and ensure that our voices are not just heard but are instrumental in the rulemaking process. This isn't just about better policies; it's about creating a healthier, fairer Minnesota for all.

G.A. Bonneville · Citizen · (Postal Code: unknown) · Oct 06, 2023 3:22 pm

0 Votes

Comment attached.

Margaret Levin · Citizen · (Postal Code: unknown) · Oct 06, 2023 3:25 pm

0 Votes

Please see the attached letter and spreadsheet of public comments collected from Sierra Club North Star Chapter members and supporters.

Paula Holden · Citizen · (Postal Code: unknown) · Oct 06, 2023 3:31 pm

0 Votes

Thank you for the opportunity to weigh in on the rule-making and process for the new Cumulative Impacts law.

As background, I am a south Minneapolis resident who lives near the intersection of Hiawatha and Lake Street, a high-traffic area with considerable background air and noise pollution. I also experienced interacting with the MPCA, years ago, in an attempt to stop the visible and smell-able air emissions that were coming off of the ACME Foundry, adjacent to my home. At the time, I reported my observations to the MPCA, and also went to the MPCA offices to try to do some research regarding company's permit and emissions. I recall my frustration with that process; reluctant assistance at the office in accessing records, being required to pay for copies – which at that time, was a barrier to me – and came away with the feeling that I did not belong trying to interact or weigh-in there. That experience helps to inform my perspective that as a resident lay person with a lack of technical knowledge, we are at a disadvantage in trying to assert what we know and have it be taken seriously.

This is an important perspective that must be taken into account when setting up rules for engagement of residents in 'environmental justice' areas around impacts of pollution. While we may not have technical expertise, we certainly can smell toxic fumes, experience health impacts, and need to have a clear way that we can weigh in on these matters, have them be explained to us, and have our input be taken seriously.

My thoughts:
• Cumulative impacts means taking everything into account that could impact the end result; an all-inclusive consideration.
• If the language of the law allows it, a broad/full range of cumulative health impacting factors must be taken into account. Some factors include odors, sound levels, traffic levels, previously-existing health conditions that people are dealing with, soil contamination, contaminants in buildings such as lead, asbestos or others, consideration of overall pre-existing air quality, including that from emitters - whether they are regulated or not by MPCA. Consideration should not be limited simply to certain chemicals or 'pollutants of concern'; in our chemically-diverse and toxic environments, we need to be aware as broadly as possible of any potential interactions/cumulative impacts.
• Under the provision that 100 residents could submit a petition with 'relevant information' in order to trigger a Cumulative Impacts review, that relevant information be defined broadly. It must include an allowance for 'evidence' that may not, initially, appear to be relevant from a scientific/technical perspective, but must be taken seriously and looked at to thoroughly understand and 'translate' accounts/stories/experiences of residents in order to yield any evidence that could contribute to a cumulative impact of harm.
• This means that the MPCA needs to employ people who help with community engagement and assessment who are not just rules-minded, "black and white" thinkers, but who will look wholistically at what is being said by community residents and be able to take that information into account. They must also sincerely understand and value this type of non-scientific input, and possess skills in relating to community members in a way that validates their critical role.
o This is especially true given the past record of MPCA being agency that has seen its role as permitting/allowing harmful activity by industry, while allowing people and the environment to suffer, especially when it comes to racially non-white and poor communities who have historically not had the economic or political power to resist being put-upon by polluting industry.
o Community engagers must also be prepared to 'translate' tech talk coming from industry/MPCA reps in communication with less technically-trained community members.
• A Community Benefits Agreement feels a little bit mis-named, if, under this law, it is an agreement between the MPCA and an industrial emitter. The residential community must absolutely be involved in crafting such agreements.
• Community involvement should not be tokenized, but seen rather as a source of fresh ideas and perspectives that can be useful in resolving conflicts over a proposed emissions increase.
o When trying to resolve any conflict over either/or situations, we must always ask the bigger question: how can the needs of everyone be met in a sustainable way?
• While it is not relevant to the rule-making process here, I wish to note that we need to ensure that current air quality (and other measures of current conditions) is being adequately monitored; as a pre-condition, in order to accurately assess additional proposed impacts.

John Cunningham · Citizen · (Postal Code: unknown) · Oct 06, 2023 3:53 pm
0 Votes

We are writing on behalf of the members of the Aggregate & Ready Mix Association of Minnesota (ARM), the Associated General Contractors (AGC) of Minnesota, the Concrete

Paving Association of Minnesota (CPAM), the International Union of Operating Engineers (IUOE) Local 49, and the Minnesota Asphalt Pavement Association (MAPA). Our members are involved in construction activities including the mining and production of aggregate materials, asphalt, and ready mixed concrete,

Our members support the goal of the legislature and MPCA in this rulemaking to ensure that the health of Minnesota citizens is protected. Our industries are well understood and thoroughly regulated by the MPCA and other agencies through permits, reporting and existing regulations. The public can be assured that existing MPCA oversight, and associated regulations, mean that our members' facilities are constructed, modified and operated in a manner that ensures protection of human health and the environment.

As the MPCA considers factors to include in a cumulative impacts analysis, we respectfully request that the MPCA's analysis incorporates the integral positive impact our industry currently has on society's ability to meet the high priority goals of strengthening our nation's infrastructure and increasing the use of clean construction materials.

Please see the attached letter for a more detailed comments.

Olivia Dawson-Olson · Citizen · (Postal Code: unknown) · Oct 06, 2023 3:56 pm
0 Votes

Hello, Xcel Energy submits the attached letter in response to the MPCA's request for comment on the cumulative impacts rulemaking. Thank you.

Kevin Pranis · Citizen · (Postal Code: unknown) · Oct 06, 2023 3:58 pm
0 Votes

On behalf of the Minnesota Construction and Building Trades Council, please find in the attached letter our responses to the MPCA's request for comment on Cumulative Impacts Analysis procedures.

Cecilia Calvo · Citizen · (Postal Code: unknown) · Oct 06, 2023 4:13 pm
0 Votes

Minnesota Environmental Partnership and our members and partners submit these public comments on the cumulative impacts rulemaking process.

Jenni Lansing · Citizen · (Postal Code: unknown) · Oct 06, 2023 4:18 pm
0 Votes

Please see attached letter with comments.

Nahid Khan · Citizen · (Postal Code: unknown) · Oct 06, 2023 4:24 pm
0 Votes

Date: October 6, 2023

39398 Minnesota Pollution Control Agency Request for Comments on Cumulative Impacts Rule

Closed Oct 06, 2023 · Discussion · 50 Participants · 1 Topics · 54 Answers · 0 Replies · 2 Votes

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From: Nahid Khan, 28-year resident of Brooklyn Center, MN: an Environmental Justice area and city with the second highest level of air pollution, and numbers of asthma, COPD and respiratory diseases, hospitalizations and deaths in the state.

To: Minnesota Pollution Control Agency

Re: MN state Cumulative Impacts of Air Pollution Law: Rulemaking process and criteria for implementation.

As human beings, we the residents of Minnesota have a basic human right: to breathe clean air. This is the fundamental basis for life. That basic right extends to all living beings: birds, animals and plant life. Clean air is basic to a healthy ecosystem and environment upon which all life on this planet depends.

Therefore, it is indeed an important step forward for the Minnesota Legislature to have passed a new state law this year subjecting air permits for facilities to undergo environmental analysis within a framework of cumulative impacts of air pollution.

As the Minnesota Pollution Control Agency enters into the rulemaking process for the new state law on the cumulative impacts of air pollution law, I want to stress the importance of significant and meaningful public engagement that must play the leading role in defining the process and criteria for implementing this important environmental law. This public engagement must center community knowledge, history, experiences and concerns, listen to community voices, and look to community leadership as partners in the rulemaking process for this law.

No taxation without representation in this case means we the residents, workers, taxpayers, citizens, voters and constituents must always be at the forefront of consideration when it comes to environmental analysis of the cumulative impacts of air pollution UPON US!

It must be recognized that this is the imperative of democracy at work and thus the political priority when it comes to the work of the MPCA as a state government agency funded by taxpayers in our democratic political system that is supposed to serve We the People!

Democracy must always prevail over economic systems, including capitalism. Industries, commercial manufacturers, and businesses overall must be subjected to democracy and the prioritization of the equity, health and environment of We the People over the profit-making concerns.

Failure to prioritize the People over profits has seriously harmed our environment, human health, and equity at all levels. North Minneapolis and Brooklyn Center have the highest and second highest levels of air pollution in the state, and therefore the highest and second highest rates of asthma, COPD and respiratory diseases, hospitalizations and deaths in the state, and Brooklyn Park’s levels of these are on the rise.

Half of the Twin Cities as well as large areas of Greater Minnesota fit the definition of an Environmental Justice area as determined by the MN state Legislature, and the MPCA must focus on learning from residents, including those of Brooklyn Center and Brooklyn Park, as well as North Minneapolis.

Our three communities are in the process of being subjected to another grave environmental injustice: MnDOT's Hwy 252 / I-94 project through our cities. This project began undemocratically, limits community feedback and public comment to ritualized programs and a symbolic "box ticking" process to show decision-makers only that it was done, and ignores the equity, health and environmental impacts upon the people it is being imposed upon.

MnDOT's preferred project design alternative for Hwy 252 through Brooklyn Center and Brooklyn Park is expansion from a local roadway / non-freeway expressway to a 6-lane freeway that will double the traffic from 56,000 vehicles daily to 114,000 vehicles daily. Hwy 252 is currently a Tier 3 truck route that is used by only a few hundred trucks daily but with an expansion to freeway, it will become a Tier 1 truck route with thousands of heavy freight trucks traveling on it daily.
Supposedly this preferred alternative is going to make Hwy 252 "safer" although it is well-known that air pollution kills 10 times or more the number of people than are killed on highways (in the case of Hwy 252, it is 11 times more people die from air pollution in the adjacent zip codes than are killed in crashes on the highway).
Supposedly this preferred alternative is going to reduce the already non-existent congestion (well below 1 hour daily on weekdays, according to the Met Council's Transportation Policy Plan (2020)).
But double the vehicle traffic and turning Hwy 252 into a Tier 1 truck route will significantly increase air pollution impacts and cumulative air impacts for residents of adjacent neighborhoods and the Mississippi River environment. The No-Build alternative (to keep Hwy 252 as is) will increase daily traffic by only 4,000 at most by 2040 (2020 projection). So for environmental, health and equity reasons, the No-Build alternative is the least harmful one for Hwy 252.
MnDOT's preferred project design alternative for I-94 through Brooklyn Center and North Minneapolis is an expansion plan to add more lanes to an already overbuilt existing freeway that has far less traffic than its capacity. Even if Hwy 252 is expanded into a freeway, the projected increase in traffic numbers on I-94 will not meet the current capacity of I-94 and therefore does not justify a further expansion of I-94. Rather, since it is overbuilt anyway, a reduction in size would be a better environmental, health and equity choice for I-94 through North Minneapolis and Brooklyn Center.

This harmful freeway project, along with the harmful freeway project for I-94 through St. Paul, and other highway expansion projects are not included in this cumulative impacts of air pollution law, but they should be. Indeed there is a deafening silence on the harmful environmental, health and equity impacts of freeways in all the recent state plans and laws: the Governor's Climate Action Plan of 2022, the MN state Transportation Bill of 2023, and not this state Cumulative Impacts of Air Pollution law of 2023. Supporters of all of these and other actions praise their work to achieve these laws and plans as transformative, yet not a one of them say anything about the harms of highways, expanding them into freeways, and making existing freeways bigger.

Air permits should be required for expressways, highways and freeways, and this Cumulative Impacts of Air Pollution law and its rules should be applied to analysis of air pollution caused by both building them as well as the vehicles traveling on them. Leaving them out is leaving out a big source of air pollution that factors into Cumulative Impacts of Air Pollution. It is not possible to get a full picture of the data concerning Air Pollution and its Cumulative Impacts when one major source of such is blatantly ignored at every level, particularly by MnDOT, and met with silence by everyone else: all those who worked on and wrote and lobbied to pass the Governor's Climate Action Plan, the state Transportation Bill and now this law on Cumulative Impacts of Air Pollution. Leaving

expressways, highways and freeways out of such work is in fact, unfair, unjust and unethical. It is a horrific failure on the part of environmental regulators.

The MPCA is asking for public input on the following process indicators:

1. Benchmarks to determine when a cumulative impacts analysis is required / Thresholds beyond which cumulative impacts of air pollution become important:

Analysis must pay attention to short periods of time when cumulative impacts are evident:
a. transportation emissions,
b. industrial emissions,
c. radon gas,
d. fire and smoke, and
e. smoking.
They all add up and effects are biggest in:
a. short time periods and
b. over small areas nearest the sources:
so those should be the benchmarks for daily measurements not ambient measurements.

2. Required content of cumulative impacts analysis:
Mobile Source Atmospheric Toxics (from vehicles, industrial pollutants, radon gas, wildfire smoke).

3. Public Data Sources for environmental stressors in EJ areas.
The obvious ones are
a. Minnesota Department of Health studies on asthma, COPD, respiratory diseases, cardiovascular diseases.
b. Proximity to transportation routes, especially freeways, highways, expressways and other high-traffic roadways.
c. Our Streets Minneapolis and Sierra Club, NorthStar chapter (and other transportation justice, environmental justice, equity and social justice organizations)
d. Data sources from satellite imagery looking for air pollution.

4. Define conditions, criteria or circumstances that establish an environmental or health impact as a substantial adverse impact:
Medical:
a. Visits to doctors’ offices, clinics, community and school clinics;
b. Emergency room visits, hospital admissions and length of stays, types of medical treatments, numbers of deaths;
c. Medications prescribed, prescription numbers and rates.
Environmental:
a. Odor in air,
b. Visibility of pollutants in the air (such as smoke particles, nitrous oxides, greenhouse gases, sulfurous oxides, ammonia, volatile organic compounds, ozone);
c. Pollutant concentrations.
d. Air pollution such as microplastics and tire particles that blow into the air, PFAS (industrial pollutant) found in water (drinking water, wells, streams, rivers, lakes).
e. Numbers of wildlife; numbers of pollinators, insects, birds, fish, animals (numbers of dead creatures).
f. Sound / noise, and light pollution.

Question: Why are you people asking US laypeople to tell you this when you know better

than we do what these problems are?

5. Community Benefit agreements:
a. As human beings who need clean air to breathe and live, clean air is a basic human right that cannot be traded away.
b. No supposed community benefit exists or can be provided to offset the loss of clean air to breathe and live.
c. It is unethical to even consider allowing a polluter (facility) to get away with infringing upon the human right of breathing clean air to live by offering, or trading for, some supposed community benefit, which comes at the cost of clean air to breathe and live.
d. MPCA or any state agency cannot be allowed to have the power to negotiate with polluters to enable them to continue, expand or begin to emit pollutants in exchange for some supposed community benefit.
e. For example, it is unethical to tell communities that there will be jobs at the polluting facility as a trade-off for the facility polluting the air of that community and surrounding areas which the people working those jobs (and their families, neighbors and community members) have to breathe, which makes them sick. This should absolutely not be allowed.
f. The purpose of this Cumulative Impacts of Air Pollution law is to make the air cleaner; all rulemaking and applications of this law must reduce pollution from current levels and result in that is much cleaner than current levels.
g. Polluting facilities must be made aware that they are responsible for cleaning up pollution and not producing any more, and must be induced or forced to change their polluting ways.

6. Develop a public petition process for requiring a cumulative impact analysis:
This is a good idea overall for citizens to have the ability to ask for such analysis.
It needs to address the following:
a. Rules for collecting, verifying signatures, minimum number needed, residency requirements for signers;
b. To whom are petitions to be delivered;
c. Timeline for taking the petition into consideration and starting the cumulative analysis.

As members of the public, it is clear to us that our environmental regulatory system has failed to properly protect our environment, health, climate and equity. Corporate pollution, which is exacerbated by systemic inequities, oppression and racism, has devastated our lower income, working class, less educated, marginalized communities for decades. That needs to change. We need an environmental regulatory system that works to protect the people and environment, especially in areas that it has historically failed. In particular, this means North Minneapolis and Brooklyn Center, as well as other parts of the Twin Cities, particularly in neighborhoods next to freeways, highways and expressways.

This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires:
- Adequate access so there are no barriers to participation.
- Equitable standing so people are treated fairly and with respect with valuable expertise to offer.
- Influence so that comments and feedback provided are actually incorporated into the process and rules written, and aren’t merely window dressing or rituals designed to show

that community engagement was done, without having any actual influence (in the manner that MnDOT operates, to build the project they want, without the public having any actual influence, which is of course the plan all along, to prevent public influence to stop harmful freeway projects).
- Transparency with who is involved in the process, both inside and outside the agency.

The rules themselves must also center these values. The intent of this law is to reduce pollution from existing levels in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted (if at all; most would prefer polluters to be shut down).

To achieve this intent, these rules must:
- Ensure that cumulative impacts analyses are made easily accessible and understandable for community members.
- Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial, or be “grandfathered” in to continue polluting.
- Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made.

Our state agencies have a history of siding with industry over people and the environment. That emphasis on supporting capitalism over democracy needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in environmental regulatory decisions that affect them.

This law won’t fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable.

Ultimately, and sooner rather than later, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.

Thank you for your full attention to this important issue for the equity, health and environment of our adversely impacted communities in EJ areas, not to mention our climate.

Nahid Khan · Citizen · (Postal Code: unknown) · Oct 06, 2023 4:26 pm
0 Votes

Please note: The document I have attached is properly formatted so please read that version. I could not get the posted text to format properly. Thank you.

Nahid Khan · Citizen · (Postal Code: unknown) · Oct 06, 2023 4:30 pm
0 Votes

Air monitoring plan with scores; modeling by census areas and blocks; look at sources
The Air We Breathe (MDH publication)

39398 Minnesota Pollution Control Agency Request for Comments on Cumulative Impacts Rule

Closed Oct 06, 2023 · Discussion · 50 Participants · 1 Topics · 54 Answers · 0 Replies · 2 Votes

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7-day period benchmarks
air toxics: include metals (lead, arsenic, chromium)
what will facility do voluntarily to reduce their emissions and remediate the site?

Nahid Khan · Citizen · (Postal Code: unknown) · Oct 06, 2023 4:31 pm
0 Votes

Community must be involved in any agreement between MPCA and polluting facility.

RECEIVED
By: OAH on 9/28/2023 at 8:54am

Share your comment

MINNESOTA POLLUTION CONTROL AGENCY

Thank you for your interest in implementing Minnesota's new cumulative impacts law. We value your comments and will use them to better inform our process and regulations.

We need your ideas and answers to these and other important questions:
- Do you have ideas on what should be included in a community benefit agreement or cumulative impacts analysis?
- What defines a substantial adverse health and environmental impact?
- How is the impact measured or assessed?

Please provide your comments below. Include your address or email in case we have follow up questions or need more information.

First and last name: kirsten herohl
City, state, and zip code: Minneapolis, MN 55407
Email address: kherohl1@gmail.com

☑ Send me email updates about cumulative impacts.

Please enter your comment below. There is more space on the back of the page.

soil and water MUST be considered, monitored, and protected - not just air. These aspects of our ecosystems + neighborhoods are intrinsically connected. The acceptable amount of pollution for kids with asthma, the elderly, and those with lung conditions + heart disease - for all of us - is ZERO. We need Smith + Bituminous OUT of East Phillips ~~and~~ and SHUT DOWN. We need the HERC SHUT DOWN. MPCA needs to integrate real teeth to make this bill functional. Cumulative impact must include to the environment, not just directly to people. Cummulative impact rules must prevent and eliminate pollution that

Your signature: [signature]

Date: 9/13/23
14

cause health disparities or are strongly correlated with them. EJ zones for air pollution need to consider wind patterns + how far pollution actually travels, not an arbitrary radius. Community benefit agreements are just loopholes for polluters if the community vote doesn't get the final say. This power shouldn't be given to the MPCA on their behalf. I'm not even sure it should be allowed at all - wealthy communities w/ more time off of work will have more time to ~~vote~~ engage, leaving poorer communities with less voice in their health + destinies. Don't let Smith Foundries + Abbot skirt around the permit to avoid accountability! Get into the EJ areas and meet with community organizations - have in person conversations with people, and give them authority over their own communities pollution, protection. Send flyers. Post posters. Sorry this is disjointed I'm writing as it comes to me! And this has been a crazy meeting! TY for listening, and please take the challenges as a bid for trust building, I want this thing to work for real.

Share your comment

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First and last name: Heidi Adelsman

City, state, and zip code: heidiadelsman@gmail.com

Email address:

☒ Send me email updates about cumulative impacts.

(Go TO tribal committees in city & rural to request expert input.

Please enter your comment below. There is more space on the back of the page.

- NO exemptions for Abbott and Smith who will have air permits before this 2026 Rule is decided. or redo permits
- Include All emitters regardless of when their air permits were approved.

Include Benchmarks; Aces scores, TRAP, history of ER admissions in EJ area; CVA's, asthma, CHF, MI's, pre-existing hazardous waste sites, brownfields, NPL's, Superfund sites, consider hourly and daily emissions of P.M 2.5, CO, SO, NO, ozone. Consult Dakota Nation experts.

Your signature: Heidi Adelsman

Date: 9/4/23

MINNESOTA POLLUTION CONTROL AGENCY

Share your comment

MINNESOTA POLLUTION CONTROL AGENCY

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Please provide your comments below. Include your address or email in case we have follow up questions or need more information.

First and last name: Whitney Wildman

City, state, and zip code: Minneapolis, MN 55405

Email address: babybears8343@gmail.com

☒ Send me email updates about cumulative impacts.

Please enter your comment below. There is more space on the back of the page.

[redacted] I would like to see the MPCA look to disproportionately effected communities for input. Companies & polluters in Minneapolis should not be included perspectives in this issue. Communities are tired of Minnesota making sacrifices of peoples' health & well being in the name of profits for polluters in the area. In community benefit agreements, community members should have the final call on everything.

Your signature: Whitney Wildman Date: 9/14/23

Regarding what represents substantial adverse health impacts, any health impacts a community experiences at the hands of corporations in the name of profits is too many health impacts. Kids in our neighborhoods having asthma SPECIFICALLY due to pollution should be enough already.

Impact should be measured in both data re: health records, pollution measurements, etc. But also in conversations w/ community members in disproportionately affected areas. When you get into the neighborhoods affected + have actual conversations w/ people in those areas, you will get better solutions than in distant, closed-door meetings + thought groups of MPCA employees. And you will get a better picture of what people have had to live through, have had to put their families through [redacted] in order to continue prioritizing polluters' profits over the people living in the areas affected.

MINNESOTA POLLUTION CONTROL AGENCY

Share your comment

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Please provide your comments below. Include your address or email in case we have follow up questions or need more information.

First and last name: Stefanie Yost

City, state, and zip code: Minneapolis MN 55407

Email address: yostieff@gmail.com

☒ Send me email updates about cumulative impacts.

Please enter your comment below. There is more space on the back of the page.

Cumulative impacts needs to take into account all possible ~~solutions~~ sources of pollution and contaminants in water and soil, not just air.

Air permits that are currently being created need to end in 2026 so that polluters like Smith Foundry and bituminous who have been operating

Your signature: [signature] Date: 9/4/25

without permits and have supposedly been in a cumulative impacts analysis process since 2008. ~~to short circuit this upcoming process.~~ I am concerned they will get a permit now to short circuit this cumulative impacts rule process! New permits need to end in 2026.

Social determinants of health mean that people are already negatively impacted and start less healthy and ~~are~~ so will be impacted more by lower levels of pollution

Share your comment

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Please provide your comments below. Include your address or email in case we have follow up questions or need more information.

First and last name: Stefanie York

City, state, and zip code: MINNEAPOLIS MN 55407

Email address: Yostef@gmail.com

☒ Send me email updates about cumulative impacts.

Please enter your comment below. There is more space on the back of the page.

MPCA should have ~~comments~~ & concepts meetings in community fi[illegible] at Little Earth to collect and trascribe oral testmony.

People need to be able talk big picture and have you use your expertise to put that into rule making

Your signature: [signature] Date: 9/14/23

MINNESOTA POLLUTION CONTROL AGENCY

Share your comment

MINNESOTA POLLUTION CONTROL AGENCY

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Please provide your comments below. Include your address or email in case we have follow up questions or need more information.

First and last name: Tracy Molm

City, state, and zip code: Minneapolis, MN 55418

Email address: t.lorraine.molm@gmail.com

☒ Send me email updates about cumulative impacts.

Please enter your comment below. There is more space on the back of the page.

Three years is a long time to wait.

We are very skeptical that we will get polluters out of our neighborhoods. Given that the MPCA has grandfathered in permits for Bituminous Roadways & Smith Foundary in East Phillips.

Your signature: Tracy Molm

Date: 9/14/23

MINNESOTA POLLUTION CONTROL AGENCY

Share your comment

MINNESOTA POLLUTION CONTROL AGENCY

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- How is the impact measured or assessed?

Please provide your comments below. Include your address or email in case we have follow up questions or need more information.

First and last name: Mordecai Mika

City, state, and zip code: Minneapolis, MN 55418

Email address: mistamiska202@gmail.com

☐ Send me email updates about cumulative impacts.

Please enter your comment below. There is more space on the back of the page.

There needs to be serious action taken about industrial pollution from places like Smith Foundry and Bituminous Roadways

More effort to reach people in North Minneapolis and East Phillips

Your signature: MF Mika

Date: 9/14/2023

MINNESOTA POLLUTION CONTROL AGENCY

Share your comment

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- How is the impact measured or assessed?

Please provide your comments below. Include your address or email in case we have follow up questions or need more information.

First and last name: David Mulla

City, state, and zip code: Brooklyn Center, MN 55430

Email address:

☐ Send me email updates about cumulative impacts.

Please enter your comment below. There is more space on the back of the page.

Cumulative impacts should include multiple pollutants (PM2.5, Ozone, VOCs, etc). Impacts may differ depending on vulnerability of population. People with asthma, COPD, cardio-pulmonary disease are more vulnerable than healthy people. Elderly and young are more vulnerable. People who smoke or are exposed to radon gas are more vulnerable. People who live closer to source are more vulnerable. Cumulative impacts should be translated into risks of death/hospitalization. Economic impacts need to be assessed. Cumulative impacts can be greater for short durations and local areas as opposed to annual averages or regional areas. →over

Your signature: DJMulla Date: 9/19/23

Particular emphasis should be focused on risks to schools, parks, apartment buildings, etc.

Benchmarks should be based on multiple pollutants together and also should be based on rates of pulmonary deaths and hospitalizations. In other words, areas with high rates of respiratory disease should be considered for special evaluation. Air pollution in these areas should not just be maintained at existing levels, it should be decreased.

Cumulative impacts should not ignore impacts of traffic-induced air pollution.

The air quality monitoring network for cumulative impacts should be expanded for greater spatial resolution needed to evaluate local impacts in EJ areas.

The cumulative impacts analysis should focus on short-term (e.g. 24-hr) events when background air quality is poor and any extra emissions create serious adverse human health impacts.

City of Brooklyn Center has a robust Community Benefits agreement for the Opportunity site development.

MINNESOTA POLLUTION CONTROL AGENCY

RECEIVED
By: OAH on 9/28/2023 at 8:54am

Share your comment

MINNESOTA POLLUTION CONTROL AGENCY

Thank you for your interest in implementing Minnesota's new cumulative impacts law. We value your comments and will use them to better inform our process and regulations.

We need your ideas and answers to these and other important questions:
- Do you have ideas on what should be included in a community benefit agreement or cumulative impacts analysis?
- What defines a substantial adverse health and environmental impact?
- How is the impact measured or assessed?

Please provide your comments below. Include your address or email in case we have follow up questions or need more information.

First and last name: Margaret Kirtley-Sternberg

City, state, and zip code: 320 E. Buffalo St. Duluth

Email address:

☑ Send me email updates about cumulative impacts.

Please enter your comment below. There is more space on the back of the page.

I think a cumulative impact analysis should consider public health data such as life expectancy, rates of chronic respiratory disease and cardiovascular disease compared to those of people living in other areas.

Some of the groups providing input into a community benefit agreement should be local institutions such as churches & schools, people who use the area for work or recreation (hikers, bikers, walkers, skateboarders) and residents. (continued on back)

Your signature: Margaret Kirtley Sternberg Date: 9-21-23

I am hoping community benefit agreements in this area would include tree planting and pollinator habitat planting to clean the air and also (in the case of fruit & nut trees) to provide small amounts of food.

Share your comment

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Please provide your comments below. Include your address or email in case we have follow up questions or need more information.

First and last name: STEVE STERNBERG

City, state, and zip code: [redacted] Duluth MN 55811

Email address: ssternbe@d.umn.edu

☐ Send me email updates about cumulative impacts.

Please enter your comment below. There is more space on the back of the page.

Health & Environmental impacts

~~People~~ all People - Missed day of school / work
Asthma / respiratory hospital admissions
Other like heart attack / stroke
Respiratory illness rates

Environment water quality from emissions
Changes in plants & animals species ... groups, numbers
Air clarity - view I love having a view & Lake Superior. I am sad when it is low visibility

Your signature: [signature] Date: 9/21/23

Community groups – so difficult to define by
here are some suggestions

Groups that recreate here
- COGGS - bike group in Duluth
- Hiking clubs
- Gardening groups / community garden plots
- Dog park / Dog walkers
- Sport Teams (school based & other)

Groups that work here
- workers at the Facility
- Public works people (plow drivers, road repair)

Groups that live nearby
- Church's
- School clubs
- Neighbor associations

Other thoughts: Please give us feedback from all the collected comments so we know we have been heard – Post MPCA thoughts on website
Discuss it at future public meetings
Not just published after all the work is done.

Share your comment

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Please provide your comments below. Include your address or email in case we have follow up questions or need more information.

First and last name: Emily Hayes

City, state, and zip code: Duluth, MN 55807

Email address: emily.hush@gmail.com

☑ Send me email updates about cumulative impacts.

Please enter your comment below. There is more space on the back of the page.

My main concern is the lack of awareness that people in the communities who are most impacted by this law have. I want the general population to know about this and become engaged in holding this law accountable. I like the idea of canvasing. many people would benefit from learning from a person in real life opposed to the news paper or online. I believe the most meaningful way to reach people would be to bring the community →

Your signature: Date:

together in a more comfortable, fun and less formal way such as a block party or other similar fun event.

I want the community to engage with each other to realize their voices can be heard and that politicians and policy makers want to listen.

I want to see an event that bridges the gap between communities and politicians. An event that incorporated free food, music, education, activities for children and businesses. An event that all are welcome and feel welcome. An event that sparks conversation about this bill/law to others to spread awareness beyond the event.

Ultimately lets get people interested and informed by being more interesting!

Share your comment

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- What defines a substantial adverse health and environmental impact?
- How is the impact measured or assessed?

Please provide your comments below. Include your address or email in case we have follow up questions or need more information.

First and last name: Yarrow Benrud

City, state, and zip code: Duluth, MN, 55807

Email address: mugfase@gmail.com

☑ Send me email updates about cumulative impacts.

Please enter your comment below. There is more space on the back of the page.

Engagement with the youth that is growing up into their future environment would give the people that are the most impacted and will be the most impacted by the cumulative effects of pollution ~~would be essential~~ a chance to have their voice heard. This engagement could come through contacting schools, teachers and youth organizations and letting them know about the potential impacts of cumulative pollutants on their bodies and future living in this affected area.

Your signature: [signature]

Date: 09/22/23

Things to consider when developing a cumulative impact would be air pollutants as measured by safe ppms and standards. Water pollutants including heavy metals, phenolic compounds, PFAS, pharmaceuticals. Other things to consider would be cancer and other health issue rates in a community. Rate of Autism and other disabilities as they relate to pollutants and mutanagenic ~~carcinogenic~~ compounds.

Share your comment

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- What defines a substantial adverse health and environmental impact?
- How is the impact measured or assessed?

Please provide your comments below. Include your address or email in case we have follow up questions or need more information.

First and last name: Eric Enberg

City, state, and zip code: Hermantown, MN 55810

Email address: eenberg63@yahoo.com

☒ Send me email updates about cumulative impacts.

Please enter your comment below. There is more space on the back of the page.

1. Duluth is a border community. Minnesota Power plans a large natural gas power plant in Superior WI and Cenovus runs an oil refinery there as well. Pollution wafting across the border must be considered in a cumulative impact analysis.

2. Given the MPCA's unfortunate history of withholding essential information from the EPA (see recent MN Supreme Court decision), what guardrails will be put in

Your signature: Eric Enberg Date: 9/21/23

place to prevent the MPCA from advocating for polluters or entering into sweetheart deals with them.

3. A Community Benefit Agreement is described as a legally binding Agreement between the polluting entity and "the community". Who represents "the community"? Economic development officers? The city council? What guardrails will be in place to insure community-appropriate input in a form the impacted community will actually utilize. The internet is great for some communities but a mailer might be better in a marginalized community.

4. Be sure to calculate, And add in the pollution found in homes. For instance, a community that burns natural gas for cooking and has a lot of rentals probably has a lot of unvented stovetops. Nitrogen Oxides (NOx) rise above standards within minutes when using such a stove. No analysis is complete unless this home exposure is accounted for in cumulative emissions.

RECEIVED
By: OAH on 10/4/2023 at 12:48pm
Chris McConn Attachment

MINNESOTA RESOURCE RECOVERY ASSOCIATION

October 4, 2023

Dear Ms. Izzo,

On behalf of the Minnesota Resource Recovery Association, (MRRA), I write in my capacity as board chair to thank you in advance for receiving this comment. The MRRA represents eight resource recovery facilities that process approximately one million tons of solid waste per year in lieu of landfilling. This represents 1/3 of all the solid waste generated in Minnesota each year. These facilities process waste from 31 of Minnesota's 87 counties. We believe in moving Minnesota towards zero landfilling and leaving a legacy of a better Minnesota for future generations. Unfortunately, Minnesotans continue to generate more waste which over time has become more diverse and less recyclable. Though in the short-term, waste-to-energy facilities may be more expensive to operate compared to landfills, the long-term environmental risks, and liabilities for managing these wastes are much less costly.

The MRRA supports incorporating environmental justice concerns into the permitting process and is committed to working together to improve our environment. Several of the concepts in the new Cumulative Impacts law are ambiguous. This rulemaking process is the time to clarify so that we can provide the best waste management solutions to our communities with the lowest overall environmental impact. This concept will be successful only with adequate collaboration. Therefore, we ask the Minnesota Pollution Control Agency (MPCA) to consider this during the environmental justice rulemaking process and we respectfully request an opportunity to be involved to ensure rules are compatible with our shared environmental goals.

We thank you for your work to help Minnesota protect our climate and all our citizens by protecting Minnesota's investments in waste-to-energy. On behalf of the MRRA, I ask that you consider the environmental and climate benefits of resource recovery. We want to be part of the environmental justice conversation and consideration. The MRRA is available to provide additional information, resources, or discussion on this important topic.

Sincerely,

Chris McConn
MRRA Chair

RECEIVED
By: OAH on 10/5/2023 at 10:32am
Amy Westbrook Attachment

Organizational Health Equity Checklist

Foundational Practices for Health Equity Tool: https://www.astho.org/Health-Equity/Foundational-Practices-for-Health-Equity/

For each Foundational Practice, ask your team the following questions:

1. *To what extent do we have these critical capacities?*
   - *Not at all?*
   - *Isolated individuals, projects, or ad hoc efforts?*
   - *Some existing policies, procedures, and practices to support these capabilities?*
   - *Widespread organizational standards that support these capabilities exist and are measured?*

2. *What are our supports/constraints in strengthening these critical capacities?*

3. *What are some specific examples of how we do this? How could we better or more extensively incorporate these capabilities in our work?*

4. *If we already have these capabilities, are we proficient? How could we improve?*

Foundational Practice I: Expand the Understanding of Health in Words and Action

- **Assure that both the organization and its partners understand the structural and system-based issues that contribute to health inequities.**
  - ☐ Does our organization:
    - Utilize the WHO CSDH framework to increase our understanding of structural and intermediary inequities?
    - Work with communities experiencing inequities to develop, adopt, and promote a shared narrative around health equity?
    - Use its mission, vision, and values statements to communicate and support understanding of the structural and system-based inequities that contribute to poor birth and health outcomes?
    - Lead events, campaigns, and/or use social media to raise awareness of the conditions that create health and the impact of inequities on health outcomes?
    - Work with partner organizations in creating a shared narrative about what creates health?
  - ☐ Do clear messages around the key concepts of health equity permeate every area of work within our organization?
- **Use data to demonstrate the connections among social and economic conditions and health outcomes.**
  - ☐ Does our organization:
    - Analyze data to develop an understanding of the relationships among the social determinants of health and health outcomes, as well as request data from its partners to create a shared understanding?
    - Conduct any analyses using tools such as health impact assessment or research studies to examine and demonstrate impact on health inequities across policy sectors?
- **Develop leadership that is consistent around applying a racial equity lens and understanding of power and privilege.**
  - ☐ Does our organization:
    - Invite and support staff in applying knowledge of personal bias and structural racism in their own work?
    - Develop or adopt policies, practices, and tools that prioritize racial equity in order to address it explicitly?
  - ☐ Is our leadership willing and able to speak clearly about racism and the effects of social exclusion?
- **Align actions and investments to reinforce an expanded understanding of health.**
  - ☐ Does our organization:
    - Have working relationships, and the capacity to influence policy change efforts that address social inequity, with agencies or sectors such as housing, education, corrections, economic development, public safety, etc.?
    - Follow the WHO CSDH Framework and messaging around health equity?
  - ☐ Do our employees have the capacity to ask critical questions to influence how policies, practices and investments are developed within the organization?

Foundational Practice II: Assess and Influence the Policy Context

- **Assess the policy context that creates underlying systems issues that perpetuate health inequities.**
  - ☐ Does our organization:
    - Have the knowledge and skills to identify and assess the policy context for health inequities at the state and local level?
    - Use the WHO CSDH Framework (or other health equity framework) to comprehensively assess our state and local policy context regarding the structural and intermediary determinants that contribute to health inequities or advance health equity?
    - Engage the community, especially communities of color, American Indians and other communities experiencing health inequities, to inform our assessment of the policy environment?
    - Promote a health equity in all policies approach?
- **Implement policy changes that improve the social determinants of health and improve health equity.**

- Does our organization:
  - Influence, develop, and implement policies to improve social and economic conditions in our state, especially for populations of color, American Indians and others experiencing health inequities?
  - Have a process for identifying timely strategic opportunities which may not be "high priority" or "hot-button" issues?

- **Assess and improve our organizations internal policies, programs, and systems, using an equity lens.**
  - Does our organization apply a health and racial equity approach to our organizational procedures, including:
    - Grant making and reviewing procedures?
    - Hiring and human resources procedures?
    - Workforce development procedures?
    - Data acquisition and analysis procedures?
    - Budgeting and resource allocation procedures?
    - Other key organizational procedures?

<u>Foundational Practice III: Lead with an Equity Focus</u>

- **Clearly articulate an equity framework and take action to advance health equity.**
  - Does our organization:
    - Have health equity as a central focus of its mission/activities?
    - Have key senior staff who champion health equity and take action to address social determinants of health.
    - Incorporate health equity and the social and economic conditions necessary for health into state plans, budgets, assessments, and other strategic documents?
  - Do leaders in our organization:
    - Recognize the significance of social stratification and take action to advance equity along lines of race, gender, class and income, geography, sexual identification, physical ability, and other socially-defined categories that confer advantage and disadvantage?
    - Have the ability to identify and analyze the power relations of institutions and organizations?
- **Engage stakeholders and commit resources to achieve health equity.**
  - Do leaders in our organization:
    - Help populations that experience inequities to influence the department's program/policy efforts?
    - Engage with organizations to create/carry out strategies to advance policy change for health equity?
    - Inspire staff and meaningfully engage all stakeholders – including communities of color, American Indians and other communities experiencing inequities – toward a shared agenda and resources to advance health equity?
- **Foster health equity leadership within the organization and community.**
  - Does our organization:
    - Foster and support the development of leaders at all levels of the organization?
    - Work collaboratively with grassroots and civic organizations whose activities advance health equity?
    - Recognize and support existing and emerging leaders for health equity across the organization?
    - Assure that policy makers are prepared to set policy that advances health equity?
  - Do leaders within our organization collaborate well with one another and with leaders outside of the organization to advance health equity?

<u>Foundational Practice IV: Use Data to Advance Health Equity</u>

- **Develop and maintain data systems with an expanded understanding of structural and intermediary determinants.**
  - Does our organization:
    - Regularly and systematically collect data on a range of measures across the WHO CSDH Framework?
    - Ensure that data collection methods gather information that allow us to effectively analyze the interrelationships among structural and intermediary determinants of health and health outcomes?
    - Identify gaps in data collection that could help better understand the impacts social and economic conditions have on health outcomes?
    - Acknowledge the limitations and challenges of collecting and reporting data by race/ethnicity and other population subgroups, and do we have strategies in place to address these?
  - Has our organization identified, with community stakeholders, a core set of measures to identify and track correlations between key structural determinants and intermediary determinants and their contributions to measures of health outcomes and health inequities?
- **Analyze data effectively in order to monitor trends and impacts of social determinants of health and health inequities.**
  - Does our organization:
    - Regularly collect and disaggregate data findings by race, ethnicity, language, gender, age, sexual identification, disability status, income, educational attainment, zip code, and other factors, such as a neighborhood deprivation index, as appropriate?
    - Evaluate different methods for categorizing race/ethnicity?
    - Identify and obtain missing data that would reveal health inequities?
    - Evaluate the ways in which biases may determine how we analyze, report and use our data?
- **Report data to stakeholders and the public in order to promote action to advance health equity.**

- Does our organization:
  - Format data findings so that they are useful for all sectors, community stakeholders, and levels of government?
  - Leverage findings from data collection and analysis in order to help change the narrative of what creates health, inform policy change, and support partnerships and engagement?

Foundational Practice V: Advance Health Equity through Continuous Learning

- **Provide education and communication on health equity to all parts/sectors of the organization.**
  - Does our organization:
    - Expand the understanding of what creates health equity with all staff and community stakeholders?
    - Educate public health leaders in effective public health practices to advance health equity?
- **Develop and maintain a highly qualified, well-trained and diverse workforce.**
  - Does our organization:
    - Work with educational institutions to assure the availability of a highly qualified, well-trained, and diverse workforce with the knowledge and skills to advance health equity?
    - Commit to developing a professional workforce that reflects the demographics of the populations we serve?
    - Build the skills and competencies of public health practitioners to identify the role of structural and intermediary determinants on health?
    - Build internal capacity related to health equity through training and professional development?
- **Use continuous quality improvement strategies for ongoing learning, innovation, and improvement of the organization.**
  - Does our organization:
    - Develop leadership capacity for building a culture of ongoing learning and incorporating continuous quality improvement into daily work to advance health equity?
    - Use performance management and quality improvement principles, such as rapid-cycle improvement, to continuously improve our policies, processes, and programs to advance health equity?
    - Have a plan for spreading successes in advancing health equity?
    - Provide peer-to-peer learning opportunities to advance practice around health equity?

Foundational Practice VI: Support Successful Partnerships and Strengthen Community Capacity

- **Develop and deepen cross-sector and interagency relationships.**
  - Do our organization:
    - Have leaders who reach out and engage their interagency counterparts to add health considerations to policies in areas outside of traditional public health concerns such as transportation, housing, employment, economic development, etc.?
    - Use the WHO definition of health to engage others and improve the social and economic conditions for health?
    - Work to ensure an understanding of a health equity in all policies approach?
    - Use cross-sector data to support our collaborations with other cross sector agencies?
    - Have developed partnerships with communications experts and the media to assure understanding in the community and expand opportunities for health?
- **Form and maintain community partnerships with multiple stakeholders, including communities of color, America Indians, and others experiencing health inequities.**
  - Does our organization
    - Partner in a way that intentionally shares power and decision making?
    - Partner with a diverse group of individuals and organizations/agencies, including but not limited to: individuals and groups experiencing inequities: people of color; local and Tribal health departments; cross sector agencies; universities/colleges; the executive branch; community organizations and coalitions?
    - Designate enough time and create avenues for meaningful participation of communities of color, American Indians and others experiencing health inequities in project governance and oversight, assuring that the people who are affected by various decisions are involved in the decision-making process?
    - Practice transparency with communities around agency needs and priorities?
    - Prepare staff to respectfully and thoughtfully engage with communities of color, American Indians and others experiencing health inequities?
    - Utilize the WHO CSDH Framework with partners in conducting community health needs assessments?
  - Are decisions in our organization made in collaboration with community partners – especially communities of color, American Indians and others experiencing health inequities?
  - Has our organization, completed, participated in, or planned a community health needs assessment in collaboration with community partners including people of color, American Indians and others experiencing health inequities?
- **Strengthen community capacity to build collective efficacy to foster institutional and structural change that advances health equity.**
  - Does our organization:
    - Build the leadership capacity of community members to advocate on issues affecting the environmental, social and economic conditions that impact health?
    - Intentionally foster strong relationships between cross-sectoral partners and populations of color, American Indians and others experiencing health inequities?

- Work to engage and support populations of color, American Indians and others experiencing health inequities in creating more equitable, local living and working conditions?
- Actively work to reduce the marginalization of specific racial, socioeconomic or newcomer groups and build inclusive communities and decision making processes?
- Have an evaluation plan of our community engagement efforts to ensure continuous learning and impact of partnering with communities?
- Share the evaluation results of our community engagement efforts with community partners?

Foundational Practice VII: Assure Strategic and Targeted Use of Resources

- **Strategically direct fiscal and human resources to those with the greatest need to advance health equity.**
  - Does our organization:
    - Assure that resources are not reinforcing cultural bias, barriers or inequities?
    - Assure strategic distribution of the fiscal and human resources that make possible optimal health and quality of life for all individuals?
    - Have current data that inform where resources should be invested to address those with greatest need?
    - Track resource allocation to assure that it is directed to those with greatest need in order to advance health equity?
- **Invest in research and practice-based strategies and shared priorities for advancing health equity.**
  - Does our organization:
    - Invest in identifying practice-based evidence that is culturally responsive?
    - Have a planned approach to assure that resources to advance health equity are allocated based on research and practice-based evidence?
    - Prioritize funding in ways that emphasize the assets and opportunities needed across the life span?
- **Use resources to build system capacity to advance health equity.**
  - Does our organization:
    - Allocate sufficient resources for policy development and implementation, workforce development, quality improvement, and performance measurement to advance health equity?
    - Allocate funds to support the meaningful participation of communities of color, American Indians, and others experiencing health inequities in societal decision-making and prioritization processes?
- **Align funding streams across all sectors and levels of government to maximize the impact of efforts to advance health equity.**
  - Does our organization align funding streams to promote health equity and the elimination of health inequities?
  - Are our organization's payment methodologies and fiscal incentives aligned with performance on health equity measures?
  - Is our organization's fiscal policy aligned with equitable access to services, supports, assets, and opportunities?
- **Track progress to assure accountability for optimal resource use.**
  - Do we hold our organization's provider networks (hospitals/clinics) and other public health system partners accountable for advancing health equity?
  - Are fiscal, programmatic and outcomes analysis, tracking, and improvement processes in place for all allocated expenditures?
  - Does our organization:
    - Track and analyze whether public health allocations are spent in a manner that advances health equity and supports the reduction of health inequities?
    - Rigorously follow and monitor fiscal principles and requirements of public/private stewardship and accountability to improve health equity?

RECEIVED
By: OAH on 10/5/2023 at 2:46pm

Comment 1 of 12
Contact Name: Rachel Wormer
Contact Info: info@hpforhc.org

Dear Minnesota Pollution Control Agency,

I am a public health professional with a background in sexual and reproductive health.

From my experiences caring for peoples' reproductive health needs, I have seen how toxic environmental exposures combine with existing, unjust socioeconomic conditions and directly harm the health of people of reproductive age, pregnant and birthing people, infants, and school-aged children — especially Black, Brown, and Indigenous people in Minnesota.

I also live in an area designated as an environmental justice community under the cumulative impacts law. **I see the deep, urgent need for the MPCA to truly engage, listen to, and center the voices, needs, and expertise of community members within impacted communities.**

The cumulative impacts rule must effectively protect the people and environment, especially for communities who our systems have historically failed and currently harm. The rule must center anti-racism, health equity, and environmental justice to reach lower pollution levels for impacted communities. **This means that the MPCA — together with community members — must collaboratively and transparently create these rules.** To achieve that, we need the cumulative impacts rule to do the following:

- Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. This means asking impacted communities what they need and acting on their feedback. The MPCA must provide information in plain, accessible language in English and communities' preferred languages. The MPCA needs to prioritize providing ample time for community input, free transportation to in-person meetings, and free childcare.

- Create an equitable, transparent process for impacted communities to approve or deny a community benefit agreement. Agreements must have a transparent, well-publicized, and accessible public comment period. The rules must be written so communities can challenge and amend an existing agreement if facility owners and/or operators are not fulfilling their parts of a community benefit agreement.

- Prioritize building relationships with leaders beyond environmental organizations. This includes racial, economic, reproductive, food, and housing justice organizations as well as neighborhood associations, agricultural groups, faith groups, Indigenous groups, and labor unions.

Thank you for the opportunity to comment,

Rachel Wormer, MPH

Dear Minnesota Pollution Control Agency,

I am an environmental health researcher working with communities in Duluth and greater Minnesota. As a health professional with seven years of experience, I understand the clear, negative impacts that pollution and environmental racism have on community health and wellbeing.

In my research, I have learned how exposure to pollutants across the life course is associated with, and exacerbates, all the major chronic diseases that impact the lives of Minnesotans — cardiovascular disease, respiratory conditions, cancer, autoimmune disorders, reproductive system disorders, neurodevelopmental and neurodegenerative disorders, and metabolic disorders such as diabetes. These conditions negatively impact quality of life, and disproportionately impact marginalized communities. These impacts are compounded by other inequitable socioeconomic factors like decreased access to quality healthcare.

It is critical that the MPCA include impacted communities in this work at every stage of the process — not just in these initial phases of developing the process, but also once the process is implemented. For example, community advisory boards could be established who will partner with the MPCA to establish community benefit agreements and to hold facilities accountable for honoring those agreements by being engaged in monitoring processes.

Another important issue to consider that is particularly relevant to the Duluth community is the impact that facilities outside MPCA's regulatory purview have on those communities, i.e., emissions from facilities based in Superior, Wisconsin, are also present and impacting environmental justice communities in Duluth. It will be important to consider that impact in permitting decisions for which the MPCA has regulatory authority, but also the MPCA should work to hold those facilities accountable, including speaking with regulatory counterparts in Wisconsin and calling on them to also consider cumulative impacts of pollutants on Wisconsin communities.

The cumulative impacts rule must effectively protect the people and environment, especially in communities that our systems have historically failed. The rule must center anti-racism, health equity, and environmental justice to reach lower pollution levels for impacted communities. **This means that the MPCA — together with community members — must collaboratively and transparently create these rules.**

The rule must embody the intent of the legislation, which is to improve health and quality of life in environmental justice communities. This will only be achieved by creating accessible processes for impacted communities to provide input and by MPCA meaningfully acting on environmental justice communities' input.

Thank you for the opportunity to comment on this important policy to advance health equity for Minnesota's environmental justice communities,

Brenna Doheny, PhD, MPH

Dear Minnesota Pollution Control Agency,

I am a pediatric cardiac ICU nurse working with communities in Minneapolis, Minnesota.

I've been a health professional for seven years. As a health professional, I understand the clear, negative impacts that pollution and environmental racism have on community health and wellbeing.

I work with children who are born with heart disease, the number one birth defect in the world. There is a growing body of evidence that air pollution is linked to congenital heart disease, which can be fatal, cause lifelong developmental delays or disability, or at best require a hospital stay and frequent medical checkups. The care of these children requires highly specialized healthcare professionals and is incredibly resource intensive. Imagine how many lives could be saved, how many children could be spared from having to undergo open heart surgery and distressing hospital stays, if we effectively consider cumulative impacts and reduce overall pollution.

The cumulative impacts rule must effectively protect the people and environment, especially in communities that our systems have historically failed. The rule must center anti-racism, health equity, and environmental justice to reach lower pollution levels for impacted communities. **This means that the MPCA — together with community members — must collaboratively and transparently create these rules.** To achieve that, we need the cumulative impacts rule to do the following:

- Ensure that cumulative impacts analyses are made easily accessible and understandable for community members.
- Create an equitable, transparent process for impacted communities to approve or deny a community benefit agreement. Community benefit agreements must have a transparent, well-publicized, and accessible public comment period.
- Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made.

The rule must embody the intent of the legislation, which is to improve the health and quality of life in environmental justice communities. This will only be achieved by creating accessible processes for impacted communities to provide input and by MPCA meaningfully acting on environmental justice communities' input.

Thank you for the opportunity to comment on this important policy to advance health equity for Minnesota's environmental justice communities,

Brooke Bartholomew, BSN, RN, CCRN

Dear Minnesota Pollution Control Agency,

I am a retired substance abuse prevention coordinator. As a health professional, I understand the clear, negative impacts that pollution and environmental racism have on community health and wellbeing.

Studies on children's brains have shown that pollution changes the brain, which can affect the cognitive abilities of young people whose brains are developing. Additionally, the elderly show effects on the brain that can lead to dementia when living in polluted communities.

The cumulative impacts rule must effectively protect the people and environment, especially in communities that our systems have historically failed. The rule must center anti-racism, health equity, and environmental justice to reach lower pollution levels for impacted communities. **This means that the MPCA — together with community members — must collaboratively and transparently create these rules.** To achieve that, we need the cumulative impacts rule to do the following:

- Ensure that cumulative impacts analyses are made easily accessible and understandable for community members.
- Create an equitable, transparent process for impacted communities to approve or deny a community benefit agreement. Community benefit agreements must have a transparent, well-publicized, and accessible public comment period.
- Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made.

The rule must embody the intent of the legislation, which is to improve the health and quality of life in environmental justice communities. This will only be achieved by creating accessible processes for impacted communities to provide input and by MPCA meaningfully acting on environmental justice communities' input.

Thank you for the opportunity to comment on this important policy to advance health equity for Minnesota's environmental justice communities,

Kathryn Iverson

Dear Minnesota Pollution Control Agency,

I am a maternal and child health public health nurse with 20 years of experience. As a health professional, I understand the clear, negative impacts that pollution and environmental racism have on community health and wellbeing.

Poor air quality causes poor health outcomes throughout our lifespans, from poor pregnancy outcomes such as preterm labor, miscarriages, and stillbirths, to childhood asthma, to cardiovascular disease to dementia in the elderly. Plus, fossil air pollution is overheating our planet and causing climate breakdown. Often, it is our poor communities and communities of color that have the most pollution. Air pollution causes our cells to react more to allergens, increasing allergies, asthma, and other respiratory exacerbations. Prenatal and postpartum exposure to pollution is associated with neurodevelopmental delays, autism, ADHD and childhood asthma. Reducing air pollution has immediate health impacts. When a large coal plant was shut down in Pennsylvania, they immediately saw reduced ER and hospitalizations for cardiovascular disease. We have clean alternatives. We are paying too high a price for fossil fuel profits. Everyone deserves clean air, especially children. Our children deserve to grow and meet their full potential. They deserve clean air.

The cumulative impacts rule must effectively protect the people and environment, especially in communities that our systems have historically failed. The rule must center anti-racism, health equity, and environmental justice to reach lower pollution levels for impacted communities. **This means that the MPCA — together with community members — must collaboratively and transparently create these rules.** To achieve that, we need the cumulative impacts rule to do the following:

- Ensure that cumulative impacts analyses are made easily accessible and understandable for community members.
- Create an equitable, transparent process for impacted communities to approve or deny a community benefit agreement. Community benefit agreements must have a transparent, well-publicized, and accessible public comment period.
- Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made.

The rule must embody the intent of the legislation, which is to improve the health and quality of life in environmental justice communities. This will only be achieved by creating accessible processes for impacted communities to provide input and by MPCA meaningfully acting on environmental justice communities' input.

Thank you for the opportunity to comment on this important policy to advance health equity for Minnesota's environmental justice communities,

Ronda Seifert, RN BSN IBCLC

Dear Minnesota Pollution Control Agency,

I am a nurse practitioner working with communities in Minneapolis, Minnesota. I've been a health professional for over a decade. As a health professional, I understand the clear, negative impacts that pollution and environmental racism have on community health and wellbeing.

The cumulative impacts rule must effectively protect the people and environment, especially in communities that our systems have historically failed. The rule must center anti-racism, health equity, and environmental justice to reach lower pollution levels for impacted communities. **This means that the MPCA — together with community members — must collaboratively and transparently create these rules.** To achieve that, we need the cumulative impacts rule to do the following:

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Thank you for the opportunity to comment on this important policy to advance health equity for Minnesota's environmental justice communities,

Jessica Fisher, DNP

Dear Minnesota Pollution Control Agency,

I am a public health researcher working with communities across Minnesota. As a health professional with seven years of experience, I understand the clear, negative impacts that pollution and environmental racism have on community health and wellbeing.

For example, I saw how Black communities and children in North Minneapolis and Rondo in St. Paul were impacted by air pollution from highways that led to disproportionate rates for asthma and other respiratory diseases. In rural areas, I saw how pollution from farms, airports, and industries led to rural communities and communities of color being exposed to high levels of nitrate, sulfate, sediments, PFAS/PFOS, etc. I remember hearing from Black farmers that the only available land they could purchase was land previously owned by a chicken factory farm with legacy pollutants that leached into their wells. They had to pay out-of-pocket to regenerate soil to grow crops and filter polluted runoff from contaminating groundwater. This goes to show how disinvestment in neighborhoods of color and discriminatory practices (like how loans were and are distributed) continually place communities of color and low-income communities in areas that are close to sources of pollutants or are on polluted land.

The cumulative impacts rule must effectively protect the people and environment, especially in communities that our systems have historically failed. The rule must center anti-racism, health equity, and environmental justice to reach lower pollution levels for impacted communities. **This means that the MPCA — together with community members — must collaboratively and transparently create these rules.** To achieve that, we need the cumulative impacts rule to do the following:

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Thank you for the opportunity to comment on this important policy to advance health equity for Minnesota's environmental justice communities,

Jocelyn Leung

Dear Minnesota Pollution Control Agency,

I am a family medicine physician working with communities in Duluth, Minnesota. I've been a health professional for 25 years. As a health professional, I understand the clear, negative impacts that pollution and environmental racism have on community health and wellbeing.

The cumulative impacts rule must effectively protect the people and environment, especially in communities that our systems have historically failed. The rule must center anti-racism, health equity, and environmental justice to reach lower pollution levels for impacted communities. **This means that the MPCA — together with community members — must collaboratively and transparently create these rules.** To achieve that, we need the cumulative impacts rule to do the following:

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Thank you for the opportunity to comment on this important policy to advance health equity for Minnesota's environmental justice communities,

Emily Onello, MD

Dear Minnesota Pollution Control Agency,

I am a retired interventional radiologist with over 50 years of experience. As a health professional, I understand the clear, negative impacts that pollution and environmental racism have on community health and wellbeing.

The cumulative impacts rule must effectively protect the people and environment, especially in communities that our systems have historically failed. The rule must center anti-racism, health equity, and environmental justice to reach lower pollution levels for impacted communities. **This means that the MPCA — together with community members — must collaboratively and transparently create these rules.** To achieve that, we need the cumulative impacts rule to do the following:

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Thank you for the opportunity to comment on this important policy to advance health equity for Minnesota's environmental justice communities,

David Hunter
Professor Emeritus of Radiology
University of Minnesota

Dear Minnesota Pollution Control Agency,

I am a registered dietician and certified diabetes care and education specialist working with communities in Minneapolis, Minnesota. As a health professional with 15 years of experience, I understand the clear, negative impacts that pollution and environmental racism have on community health and wellbeing.

In my work, I have seen patients refrain from physical activity (i.e., taking a walk outside, riding their bikes, etc.) due to poor air quality exacerbated by pollution. As a result, chronic conditions like diabetes are more difficult to manage.

The cumulative impacts rule must effectively protect the people and environment, especially in communities that our systems have historically failed. The rule must center anti-racism, health equity, and environmental justice to reach lower pollution levels for impacted communities. **This means that the MPCA — together with community members — must collaboratively and transparently create these rules.** To achieve that, we need the cumulative impacts rule to do the following:

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Thank you for the opportunity to comment on this important policy to advance health equity for Minnesota's environmental justice communities,

Theresa Lang, RD, CDCES

Dear Minnesota Pollution Control Agency,

I am a public health professional working with communities in Minneapolis, Minnesota. As a health professional with four decades of experience, I understand the clear, negative impacts that pollution and environmental racism have on community health and wellbeing.

I live near downtown Minneapolis, one of the areas with the highest rates of childhood asthma hospitalizations and emergency department visits in the state due to traffic industrial pollution sources.

The cumulative impacts rule must effectively protect the people and environment, especially in communities that our systems have historically failed. The rule must center anti-racism, health equity, and environmental justice to reach lower pollution levels for impacted communities. **This means that the MPCA — together with community members — must collaboratively and transparently create these rules.** To achieve that, we need the cumulative impacts rule to do the following:

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Thank you for the opportunity to comment on this important policy to advance health equity for Minnesota's environmental justice communities,

Kathleen Schuler, MPH

Dear Minnesota Pollution Control Agency,

I am a biologist working with communities in the Twin Cities. As a health professional with 23 years of experience, including in teaching biology, I understand the clear, negative impacts that pollution and environmental racism have on community health and wellbeing.

The cumulative impacts rule must effectively protect the people and environment, especially in communities that our systems have historically failed. The rule must center anti-racism, health equity, and environmental justice to reach lower pollution levels for impacted communities. **This means that the MPCA — together with community members — must collaboratively and transparently create these rules.** To achieve that, we need the cumulative impacts rule to do the following:

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Thank you for the opportunity to comment on this important policy to advance health equity for Minnesota's environmental justice communities,

Pamela Thinesen, Biologist

RECEIVED
By: OAH on 10/5/2023 at 3:37pm
Tony Kwilas Attachment

MINNESOTA CHAMBER OF COMMERCE
GROWING MINNESOTA

October 5, 2023

Administrative Law Judge James Mortenson
Minnesota Office of Administrative Hearings

Comments submitted electronically through OAH's website

The Minnesota Chamber of Commerce (Chamber) submits these comments in response to the Minnesota Pollution Control Agency's (MPCA or Agency) request for comments on the Agency's planned rulemaking related to cumulative impacts in environmental justice areas. The Chamber represents members that the rulemaking will impact.

As indicated below, the Chamber welcomes this opportunity to share its point of view regarding the proposed regulations. The Chamber recognizes that these rules, in conjunction with associated rules for air toxics regulation, pose the possibility of a significant impact on the economic vitality of the areas subject to the rules. We believe that the MPCA also recognizes this concern. As such, the Chamber urges MPCA to be deliberative and consultative in its approach.

Toward that end, and as a preliminary matter, the Chamber urges creating an advisory committee of key stakeholders to consult with the Agency before publishing draft rules. These stakeholders should include significant representation from parties that will be subject to new legal requirements under this rule as well as community representatives. Such a process would help drive consensus around key issues to create a strong and well-considered proposed rule and help the MPCA avoid (or at least narrow the scope of) potential rule challenges.

Overview

The Chamber supports efforts to ensure facilities operate in a manner that minimizes public health risks. We understand the importance of maintaining public trust in operating facilities, particularly in communities that may face disproportionate impacts. At the same time, and as acknowledged by the legislation, we note that one way of addressing such issues is through ongoing and future economic development. We urge MPCA to keep in mind the need to protect public health while not unduly stalling or stifling needed economic development.

The Chamber is providing specific responses to the MPCA questions below. However, as a preliminary matter, we note that assessing cumulative impacts for existing or potential industrial operations is complex and challenging. While a number of state agencies and the US EPA may be considering how or whether to

implement some form of Cumulative Impacts Analysis requirement, we are unaware of any agency (local, state, or federal) in the United States that is implementing a program with positive and objectively measurable results. A fit-for-purpose underlying scientific approach is still in development.

We understand that the MPCA has an obligation to undertake this effort consistent with its legislative mandate, and we urge the Agency to be deliberate and thoughtful in its approach. We believe the legislation gives the MPCA the latitude to take an incremental approach to implementation, starting with a program that focuses on the areas of greatest potential concern and, as necessary, expanding from there.

Definition of Cumulative Impacts

We note that cumulative impacts can mean different things to different people. For example, US EPA, in its January 2022 Draft Recommendations for ORD Research, defines cumulative impacts as "the total burden – positive, neutral, or negative – from chemical and non-chemical stressors and their interactions that affect the health, well-being, and quality of life of an individual, community, or population at a given point in time or over a period of time." That is not what the Minnesota Legislature intends here. Section 3 of Article 8 of HF 2310 (Subd. 1 (c)) defines cumulative impacts as the "impacts of aggregated levels of **past and current air, water, and land pollution** in a defined geographic area to which current residents are exposed." (emphasis added). This point is reinforced by the fact that the Legislature chose to trigger possible cumulative impact evaluation based solely on air quality permit activity (per Subd. 2 and Subd. 1 (h)).

Thus, the Legislature intends the focus to be on specific pollution impacts. In that way, this cumulative analysis is more akin to a cumulative risk analysis, focused on the additive impacts of pollutants. While environmental stressors (as defined in the legislation) are relevant to the analysis and the MPCA's ultimate decision to issue or deny a permit, we believe the Legislature's particular focus on pollution impacts was intentional. We urge the Agency to keep this in mind as it proceeds with rulemaking. If the MPCA intends to include a broader scope in its rulemaking, it should make that clear as quickly as possible. We suggest the MPCA refine and focus the scope through the stakeholder process.

Consideration of the MNRisks Process as a Model

We believe the MPCA already has in place a tool it can build on. The Chamber understands the MPCA's MNRISKS process already has defined benchmarks for prioritizing any additional cumulative impacts evaluation. For example, the MNRISKS tool already considers environmental stressors as it evaluates potential focus areas. While this process may have its own concerns, the MPCA could draw insights from this program and solicit feedback to identify what concepts may work or what aspects may need to be improved in establishing criteria for areas to include or exclude from further analysis.

Definition of Environmental Justice Area

Section 3 and Section 5 of Article 8 include similar definitions of "environmental justice area", but they are not exactly the same – Section 3 includes the word "decennial" before "census data". Importantly, neither

definition specifies or implies that the census data should be modified statistically to create a confidence interval. While the Chamber has no indication at this point that the MPCA contemplates making a statistical adjustment to the Census data, the MPCA has done so on one of its current web pages (a map identifying environmental justice areas of concern), resulting in an increase in the number of such areas. The Chamber would oppose such an approach in implementing the Article 8 rules. The MPCA should make its map of environmental justice areas align with the statutory definition, which does not include any statistical adjustment, thereby ensuring a consistent understanding and identification of environmental justice areas across the state.

Not only would such an adjustment be contrary to the express language of the legislation, it would also be inconsistent with the approach utilized by other states (e.g., New Jersey, New York, Colorado) that administer cumulative impacts analysis programs. The addition of a confidence interval would artificially inflate the number of environmental justice areas which in turn would dilute the effectiveness, focus, and credibility of the environmental justice effort. Please see the Attachment for an additional technical description of this issue and concern.

As the attached analysis indicates, including a statistical adjustment (i.e., a margin of error) inappropriately skews the number of environmental justice area based solely on the confidence interval employed in one direction – to increase the number. Further, the data show the confidence interval changes based on the number of census respondents because a confidence interval may be greater for any given year's data if fewer people respond. The U.S. Census data (as presented in the Attachment) illustrates this point.

The direct result of the unidirectional statistical adjustment is to substantially increase the number of environmental justice areas based solely on that confidence interval. Thus, the data indicate that using a confidence interval can almost double the number of potential environmental justice areas in the Twin Cities metropolitan area. As the number of respondents decreased during the COVID-19 pandemic, the statistical confidence intervals increased, almost tripling the number of environmental justice areas.

Such an approach not only inflates the number of environmental justice areas in any year, it also creates greater variability in possible environmental justice areas year-to-year. For example, an area with consistent actual reported data on a year-to-year basis could become an environmental justice area because there was a low number of respondents in any given year. If the number of respondents increases the next year, the area will once again not be listed as an environmental justice area. To meet the legislation's intent, any process for identifying environmental justice areas should aim for accuracy rather than maximization.

Responses to Specific MPCA Questions

The MPCA seeks specific comment on the elements of the rules required under Subd. 6. The following section presents each topic listed in MPCA's Request for Comments (and Subd. 6(c)) with the Chamber's initial thoughts:

1. **Establish benchmarks to assist the Commissioner's determination regarding the need for a cumulative impacts analysis.**

Developing benchmarks is critical to the effectiveness of the entire program. Based on the public participation timelines in the legislation and the work necessary to prepare an analysis, the Chamber anticipates that any project that triggers the need for a cumulative impacts analysis will take a year or more to complete on top of an already schedule-constrained air quality permitting program. Thus, the decision to require an analysis is consequential. The Chamber urges the MPCA to establish clear screening criteria to ensure that the Agency's focus and resources are devoted to those instances where a cumulative impacts analysis is truly warranted and that the intent of the program is not diluted.

We urge the MPCA to establish benchmarks with clear criteria below which projects, particularly low-impact projects or projects with emissions unrelated to specific pollutants of concern, need no additional follow up. For example, the MPCA should consider:

- De minimis levels of emissions and emission increases below which no further action is needed.
- Pollutant-specific indicators where no additional action is needed – if emissions from a project are not pollutants of concern in a given area.
- Air monitoring benchmarks indicating that an area can be exempt from further analysis.
- Criteria clearly defining whether a project has a "material" impact based on the project contribution, not the background conditions.

In addition, we believe the Agency should establish separate criteria for the reissuance of existing permits as opposed to permits for new projects. For existing sources that potentially trigger review upon permit renewal, we urge the Agency to establish an actual-emissions-based approach that considers air quality monitoring data. For new projects, we urge the Agency to adopt screening criteria so that any cumulative impacts analysis process does not unduly stall or prevent needed and beneficial economic activity and infrastructure. Such screening criteria could include limiting a cumulative impacts analysis to construction projects requiring a major permit amendment.

Finally, we note that the US EPA and several early-acting states have shown an interest in developing a single number, or "score" as a metric for characterizing cumulative impacts. While developing such a metric is in the

early stages and would need additional consideration, if successful, it could provide a benchmark for the MPCA to consider in its rulemaking.

Each of our suggestions would require additional dialogue and technical work to formulate a specific approach. The need for collaboration drives our request, noted above, for an advisory committee and the potential need for technical working groups on certain topics.

2. **Establish the required content of a cumulative impacts analysis and provide sources of public information that an applicant can access regarding environmental stressors present in an EJ area.**

In the Chamber's view, this issue and the definition of "substantial adverse impact" addressed in item 3 below will be the most important portions of the rule. Thus, we urge caution and an incremental approach. Any rules need to clearly define what is, and is not, relevant to assessing cumulative impacts. MPCA must be clear about their proposed treatment of cumulative impacts across pollutants, media, and health end points. The rule also needs to define clearly when an applicant has met its duty to complete the analysis.

Based on the legislative definition of cumulative impacts, the rules also need to clarify how "environmental stressors" should be incorporated into the analysis. In other words, while relevant, the legislation implies that the MPCA Commissioner should consider stressors but that these are not intended to be part of an applicant's direct impacts analysis. This is reinforced by Subd. 5, which requires the cumulative impacts analysis be considered "in combination with the environmental stressors." To the extent the MPCA wants environmental stressors to be considered in an analysis, data and guidance should be provided to the permittee. This could be included as supporting data within a “score” approach as discussed above. If MPCA wants factors such as historical health effects or adverse social conditions to be included, the agency must develop an approach that is scientifically valid, uses sufficiently available data, and leads to a basis for decision-making. MPCA would also need to characterize uncertainty in the available data and lay out how those uncertainties should be considered.

Any rules should be clear about which data an applicant must collect and develop themselves and which data are available publicly. Requirements should be related and proportional to an applicant’s proposed action. For example, it would seem inappropriate for an applicant renewing an existing air quality permit to be required to perform a historical analysis of land pollution in the area. To enable consideration of historic pollution that is unrelated to a permit applicant’s operations, the MPCA will need to provide data and analysis for areas across the state in a consistent and easy to access manner. Again, this could be included as supporting data within a “score” approach as discussed above.

3. **Define conditions, criteria, or circumstances that establish an environmental or health impact as a <u>substantial adverse impact.</u>**

This is of utmost concern and interest to the Chamber. Because the legislation gives the MPCA the authority to deny a permit due to a "substantial adverse impact", the definition of the term must be clear and the threshold for such an impact must be high. In other words, "substantial" must clearly be substantial.

The Chamber believes the most appropriate way to address this question is as an extension of the effects identified in response to the benchmarks in question 1. Those factors/impacts are most relevant to the determination of "substantial adverse impact".

We also note that this determination must be made on a permit-specific basis. In other words, the MPCA must determine that the contribution of the impacts from the permit changes under consideration is "substantial". This is different than a determination that substantial harm is already occurring in an area (likely because of a range of factors) and that a given permit could potentially contribute, however insignificantly, to that harm. That is not the balance the Legislature asks the Agency to make.

To be substantial, we believe a given permit must be determined to contribute some level of disproportionate risk. To that end, MPCA air quality permit regulations are already designed to evaluate a project's emissions impacts on air quality and human health. Only in rare exceptions should a project that meets the air quality permitting requirements still have a substantial adverse impact. The MPCA must be clear on the ways that a cumulative impacts analysis differs from existing analyses for National/Minnesota Ambient Air Quality Standards or Air Emissions Risk Analyses.

4. **Establish the content of a community benefit agreement and procedures for entering into community benefit agreements, which must include: i) active outreach to residents of the affected EJ area designed to achieve significant community participation; ii) considerations other than or in addition to economic considerations, but with priority given to considerations that directly impact the residents of the EJ area; and iii) at least one public meeting held within the affected EJ area.**

The Chamber generally supports the goal of significant outreach and public participation in EJ areas and believes a community benefit agreement may be a good mechanism to memorialize an applicant's commitments to a community.

We are concerned that the community benefit agreement is directly tied (in Subd. 5) to the Agency decision to issue a permit following the Agency's determination of "substantial adverse impact". While an agreement creates the possibility of eliminating a lengthy cumulative impacts process, we also caution the Agency that it not become a tool by which the MPCA can avoid making a difficult "substantial adverse impact" determination. Thus, again, we urge the MPCA first to establish clear criteria for "substantial adverse impact" and then focus the efforts of any community benefit agreement on proportional measures to balance any adverse impacts and direct net benefits to the community.

A community's input on any benefit agreement is critical to success. Clear decision rights on community benefit agreements are important. If the agreement will be between a permitted entity and the MPCA, requirements for soliciting input and securing concurrence from other parties must be included in the rule. The rule writers should anticipate that many people will claim to speak for the community. The MPCA must outline a process to ensure community members who are part of the process represent the whole of the community. Each requirement in the rule must allow a permitted source operating in good faith to "complete" the process

in a reasonable time frame. The Chamber suggests that the rule focus on the process for seeking community input and not a specific outcome or requirement for community consensus. The MPCA should provide a consistent template for a community benefits agreement but recognize there is no one-size-fits-all approach, and the benefits will be community- and project-specific.

5. **Establish a petition process and form to be submitted to the Agency by EJ area residents to support the need for a cumulative impact analysis.**

The Chamber supports the creation of a petition process for deciding whether a cumulative impacts analysis is required but stresses the importance of ensuring it is a well-defined process and consistent with the legislatively-specified criteria. Specifically, the rules should define what is considered (i) "material evidence" of a (ii) "potential adverse cumulative impact" resulting from (iii) the permit under consideration. All three of these elements are necessary to support a successful petition.

As noted above, the Chamber believes it is important to clarify that the impacts under consideration must be related to the project under consideration and must be substantial. There is no legislative purpose in granting a petition for a project that, by definition, could not lead to a "substantial adverse impact," and the MPCA should establish rules to guide the petition process accordingly.

In addition, the MPCA should establish clear procedural rules for the petition process. Among other things, we believe the rules should address the timing of a petition (e.g., when in the process will a petition be deemed too late?) and verification of signatures. The rules also should establish the timeline for an MPCA decision on any petition.

The MPCA should expect petitions for projects or issues that fall outside the scope of this rule (e.g., highway projects or general noise concerns). The MPCA must be clear on their future treatment of petitions that raise out-of-scope issues. The Chamber is concerned that a new or modified permit will become a vehicle to potentially address complex and diverse community concerns that are unrelated to the permitted entity. The rule should not put the MPCA and an applicant in the position of delaying a permit's issuance due to issues that may be unrelated or even outside of MPCA's jurisdiction.

We also note that, similar to the petition process (under Subd. 3, (e)(2)), the legislation (under Subd. 3, (e)(1)) allows the MPCA to require a cumulative impacts analysis if a project is below all the benchmarks established for conducting a cumulative impacts analysis but the commissioner determines that such an analysis is "necessary" and supported by "material evidence". Likewise, clear definitions on the application of "necessary" and "material evidence" should be provided by MPCA in the rules and guidance.

6. **Establish a process through consultation as defined in MN Statute 10.65 by which a Tribal government can elect to apply this section to a permit application.**

The Chamber has no specific comment here other than to note we support Tribal Governments' authority to implement these requirements consistent with the legislation and rules.

7. **Establish methods for holding public meetings and handling public comments.**

The Chamber fully supports the goal of holding public meetings as a means of disseminating information about a project and collecting public input, particularly in EJ areas. We also support the creation of clearly defined rules and processes to govern such public meetings. We urge the MPCA to set rules that allow meeting facilitators to ensure meetings adhere to the issues at hand and that those persons most affected by a proposed project are heard. We suggest the rules allow engagement processes to run in parallel with technical review to the extent practicable and allow flexibility in the timing of consultation to allow applicants and the MPCA to address potential community concerns in an efficient way and not be bound to predetermined time frames.

Thank you for the opportunity to provide comment and participate in this rulemaking. The Chamber and its members are available for further consultation as the rulemaking process proceeds. Given the complexity of assessing cumulative impacts and the interest of diverse stakeholder, and iterative and consultative process will most likely lead to success.

Sincerely,

Tony Kwilas
Director, Environmental Policy
Minnesota Chamber of Commerce
tkwilas@mnchamber.com
651-292-4668

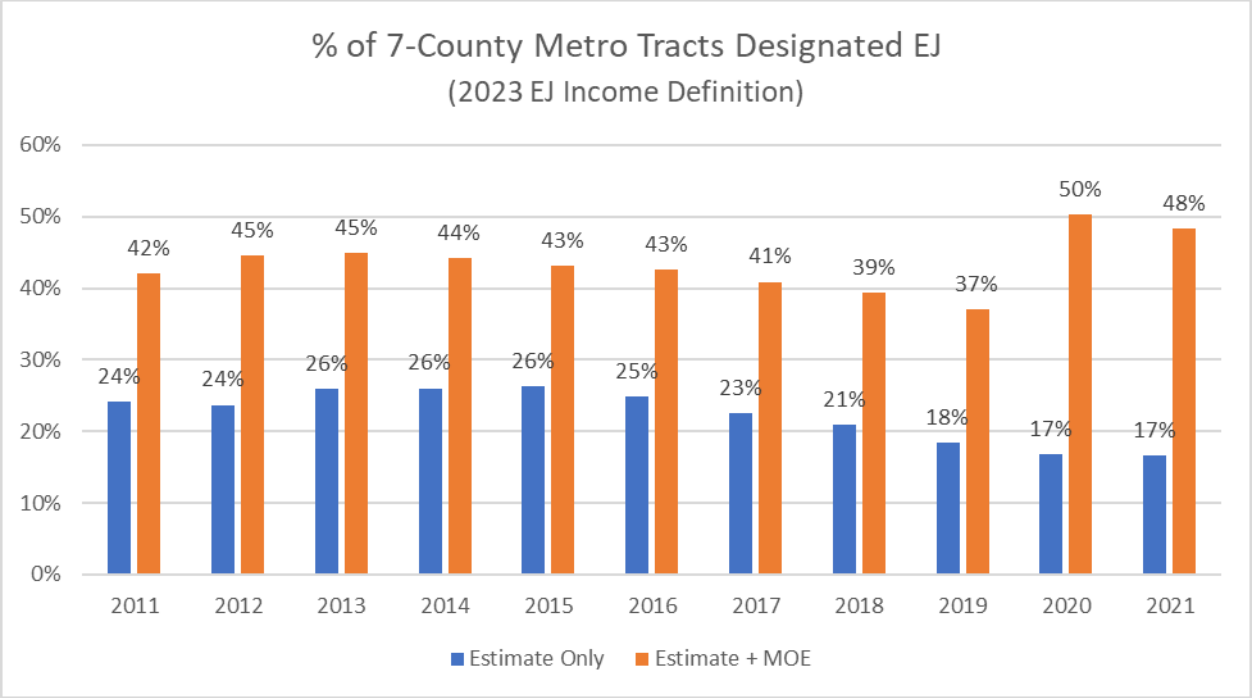
Attachment: U.S. Census American Community Survey Income Data for 7-County Metro and Margin of Error Analysis

U.S. Census American Community Survey Income Data for 7-County Metro and Margin of Error Analysis

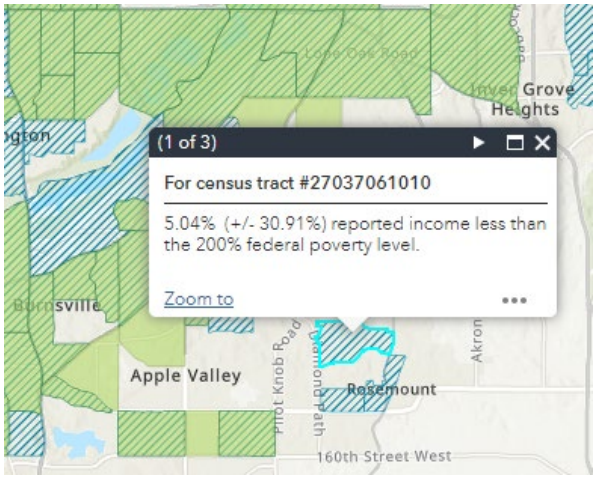
Only one of the four demographic criteria for determining whether a census tract is an Environmental Justice (EJ) area – persons of color – can be readily obtained from the most recent decennial census as defined in the law. The low-income-based criterion is outside the decennial census's scope and is expected to be based on the most recent American Community Survey (ACS), as used in other states and in the MPCA's current MNRISKS EJ Map. The current MNRISKS EJ Area Map is inconsistent with the use of ACS income data in other states and the direct read of the definition in the MN law by adding a one-sided and highly consequential margin of error (MOE) to the actual survey result estimate. The Chamber recognizes that this inconsistency is likely an unintended carryover of the prior MNRISKS Program's discretionary and conservative use of the data. Nonetheless, the Chamber provides the technical analysis below to further inform the MPCA as to why the Chamber's recommendations should be followed in making EJ designations. The Chamber believes that any broadening of the definition of environmental justice areas creates the risk of diluting the primary purpose of this legislation. Expanding the focus of this mission will, among other things, divert already scarce agency resources away from the environmental justice focus.

Note: The data below are directly obtained from the tables maintained by the U.S. Census Bureau and represent income-based EJ status, as defined by the 2023 Minnesota legislative session: "35 percent or more of the households have an income at or below 200 percent of the federal poverty level." Specifically, the Census Estimates and Margins of Error were obtained from the 5-year estimate tables for the ACS: Table C17002 for "Ratio of Income to Poverty Level in the Past 12 Months," which is consistent with the data presented with the current MNRISKS EJ Map. The data therein are obtained for census tracts within the 7-county metro area (Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, or Washington counties). The income definition of EJ status is shown here as the most broadly represented definition in current MPCA maps; however, the conclusions stated here are logically consistent for all statistical definitions of EJ status.

The chart below illustrates the direct result when MOE is incorporated into the income-based designation of EJ. In the below chart, prior to 2020, the amount of census tracts selected for EJ status was roughly doubled. In 2020 and 2021, the value that accounted for MOE (orange) roughly tripled despite a continued downward trend in low-income tracts in the actual survey results (blue).



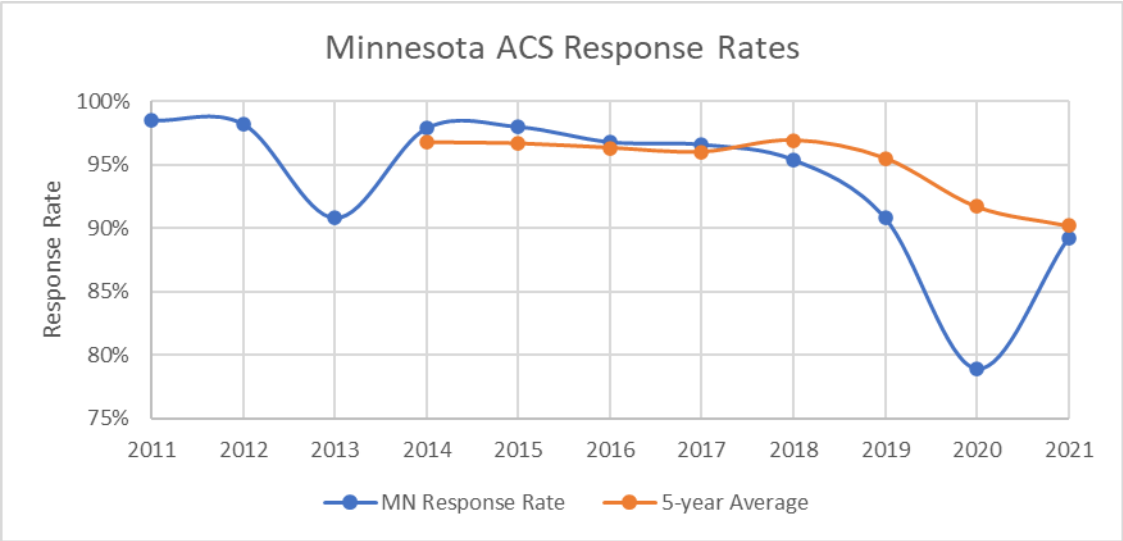
Doubling or tripling the results of the census survey data is inconsistent with the written language and intent of the law, as well as the effectiveness of implementing the law, and it is contrary to a valid assessment of tracts throughout the metro area. As an example of the extent of this relevance, a south metro tract is currently labeled as an EJ area in MPCA's MNRISKS EJ Map despite an actual survey result of 5% of the population being below the income threshold. This is due to the addition of ~31 percentage point margin of error to the base estimate, causing this tract to cross the 35% low-income EJ threshold defined by the law (~7x base estimate).



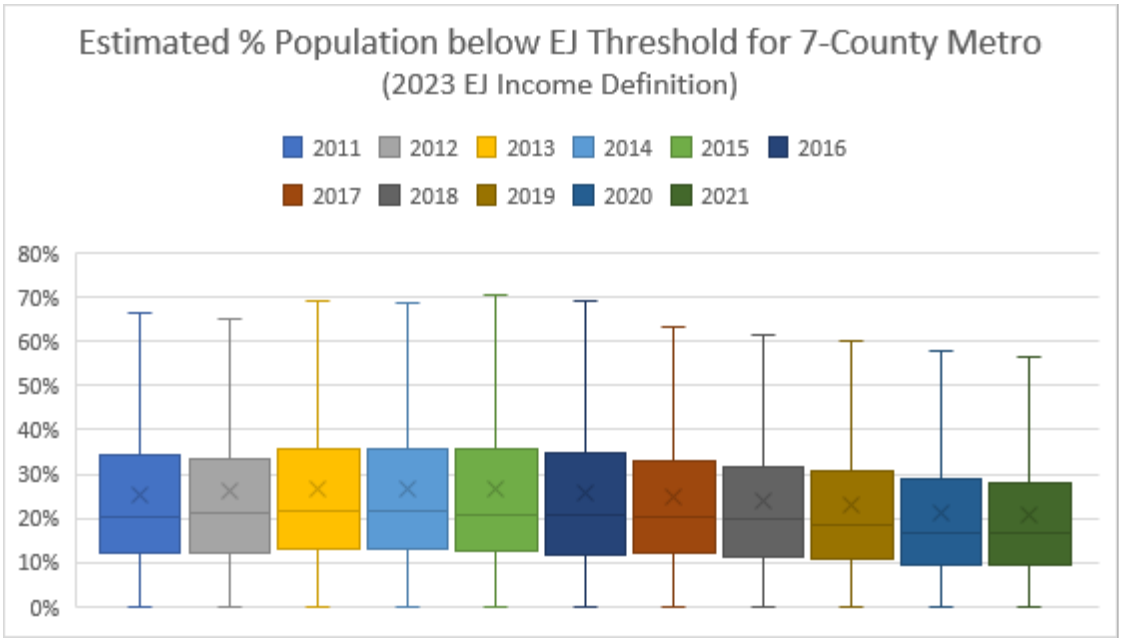
The following analysis provides further perspective on the practical application challenges if the MPCA considers such a practice.

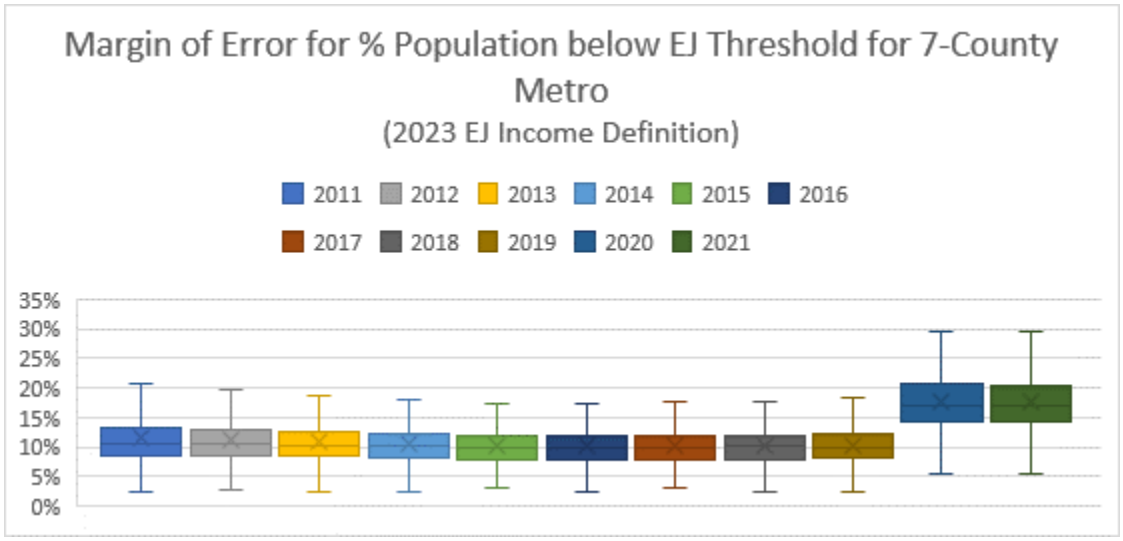
The recent step change in the effect of MOE incorporation correlates with the decrease in ACS response rates in 2020 and 2021, as shown below for Minnesota. The decrease in response rates led to a significant increase in the sampling error incurred in those years' surveys and the subsequent spike in the number of EJ-designated tracts without regard to the actual survey results received.

It is important to note that because the selected metric is a 5-year-average estimate, the clustering of poor response rates in 2019, 2020, and 2021 compounds to lower the overall sampling rate across the 5-year period. Note that the 5-year average shown in the chart below does not strictly indicate the complex weighting procedures employed by the Census Bureau and is only shown as an illustration of the compounding effects of poor response rates.



Further, an analysis of the potential variance of MOE in years with poor response rates, displayed below, shows that while the average margin of error jumps in such years, the results also spread. This means those years have greater uncertainty in the reported MOE across census tracts. Previously, those margins would range between 3% and 18%; they now range between 5% and 30% (excluding outliers). This effect is not found in the census estimates, which lends to the consistency that usage of only the estimate (without the MOE) provides.

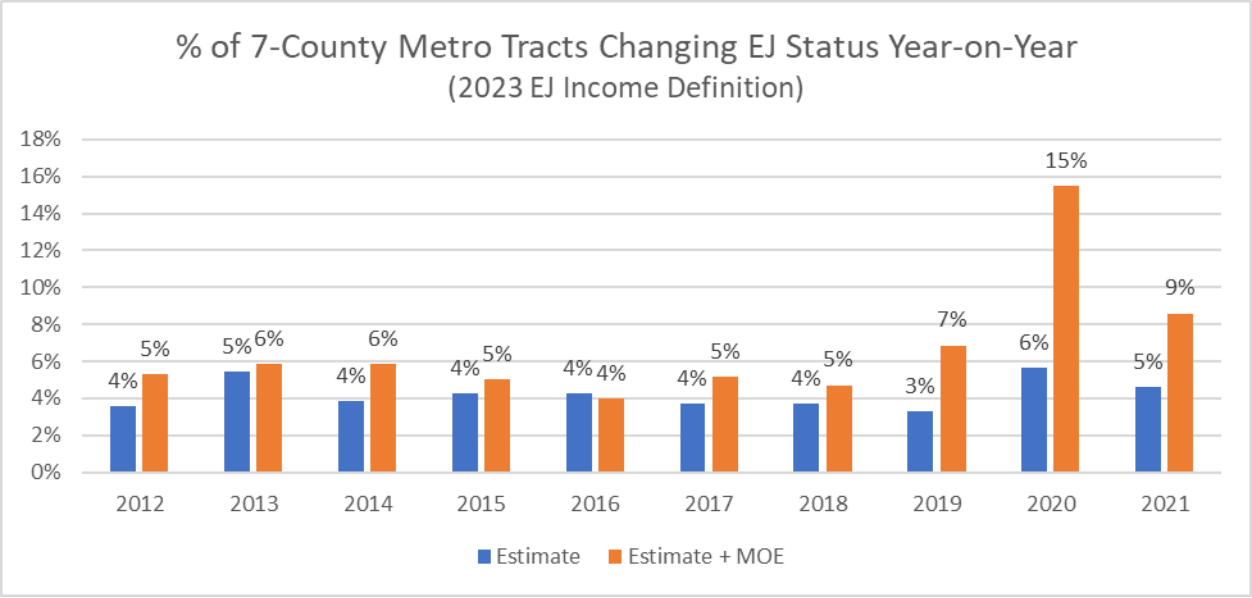




Legend:

Box: 1st quartile - 3rd Quartile
Whiskers: Min (0th Quartile) and Max (4th Quartile), excluding outliers
IQR: Interquartile range (3rd Quartile minus 1st Quartile)
Outliers: Values outside of 1.5 x IQR added or subtracted to either side of the box
X: Mean
Middle Line: Median

To this point, it is clear to see that years affected by cumulative poor response rates lead to greater variability in the EJ status, as shown below. A consistent lack of responses is likely to result in consistently large MOE and subsequent instability and exaggeration of EJ status.


% of 7-County Metro Tracts Changing EJ Status Year-on-Year
(2023 EJ Income Definition)
18%
16%
14%
12%
10%
8%
6%
4%
2%
0%
4%
5%
5%
6%
4%
6%
4%
5%
4%
4%
4%
5%
4%
5%
3%
7%
6%
15%
5%
9%
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
Estimate
Estimate + MOE

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Acute stress effects of impulsive noise during mental work

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ABSTRACT

Impulsive sound has been found to annoy people more than steady-state sound or many other types of sound presented at the same sound level. This study examined the physiological, performance, and subjective effects of impulsive sound on working humans. Exposure to impulsive sound (65 dB L_{Aeq}) was compared with quiet sound (35 dB L_{Aeq}) and steady-state sound (65 dB L_{Aeq}). This parallel-group study, where each participant was exposed to one sound condition, had altogether 59 participants. Physiological stress was measured with stress hormone concentrations in plasma (cortisol and noradrenaline), heart rate variability (HRV), and blood pressure. Psychological stress was measured with subjective noise annoyance, workload, and fatigue. Performance was measured in tasks requiring constant concentration (visual and auditory serial recall and N-back). Compared to quiet sound, impulsive sound caused more annoyance, workload, and lack of energy, raised cortisol concentrations, reduced systolic blood pressure, and decreased accuracy in the 3-back task. Compared with steady-state sound, impulsive sound was experienced as more annoying and causing a higher workload and more lack of energy. Impulsive sound caused physiological and psychological stress and decreased performance compared to quiet sound. Part of this load was due to the increased sound level, which was evident as a physiological stress reaction. Still, there was also an extra stress effect related to the impulsiveness of the sound, reflected as a psychological experience. Special care should be paid to impulsive sound, especially in environments where people are performing mental work.

1. Introduction

Excessive noise is a serious environmental stressor in many living environments. Environmental noise was estimated to have the second highest adverse public health impact of nine environmental risk factors in a study conducted across six European countries (Hänninen et al., 2014). At moderate levels, noise does not endanger one's hearing but may have non-auditory adverse effects, such as feelings of annoyance, disturbed sleep, impairment of learning in children, and an increased risk for ischemic heart disease (World Health Organization, 2011, 2018). From these adverse effects of sound, annoyance was estimated to be the second major health effect of environmental noise in Europe after sleep disturbance (World Health Organization, 2011).

Annoyance can be measured using, e.g., 11-step numerical response scale (0 Not at all annoyed, 10 Extremely annoyed) (ISO, 2003). Those who respond 8 or more, are considered as highly annoyed. High annoyance caused by different types of environmental noise has been widely investigated (e.g. Guski et al., 2017). Associations between sound levels and high annoyance are described with exposure-response relationships. They are different for road traffic, air traffic, and wind turbine noise, for example (Guski et al., 2017; Janssen et al., 2011). Furthermore, different exposure-response relationships have been found in different countries or areas (Miedema & Vos, 1998). Thus, sound level alone is an insufficient variable to explain high annoyance.

Other acoustic and non-acoustic characteristics of sound also influence the perceived annoyance. Basic sound characteristics that have been reported to increase annoyance ratings at constant sound levels in controlled laboratory experiments include, at least, tonality (Oliva et al., 2017), impulsivity (Rajala & Hongisto, 2020), spectrum (Hongisto et al., 2015), and amplitude modulation (Virjonen et al., 2019). These observations stem from so-called focused psychoacoustic experiments where participants' only task was to listen and rate the annoyance of sounds using the 11-step response scale. In our study, we sought to gain understanding on the effects of impulsive sound in a broader context, where the participants would not be focused on the sound stimulus but would be performing different cognitively demanding tasks during

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sound exposure.

Impulsive sound means that the time profile of the sound level involves strong onsets, i.e., rapid elevations of the sound level, and a release of sound right after the impulse has reached its maximum. Impulsive sounds in daily environments are numerous, since the dropping, hitting, slamming, and rattling of objects produce impulses. Typical examples in everyday life are walking, door sounds, ball games, keyboard tapping, and hammering. Speech and music also contain impulsive components, but they are seldom treated as impulsive sound, and are rather classified as sound with high information content. Since sounds contain frequencies from a broad range, from 20 to 20 000 Hz, and human hearing has a specific and well-known sensitivity to different frequencies, frequency weighting A is usually applied to describe the objective loudness of sound with a single value (IEC, 2013). This is called the A-weighted sound pressure level (SPL), L_{Aeq}, where "eq" (equivalent) refers to time-averaged value. Rajala and Hongisto (2020) have shown that an impulsive sound can be significantly more annoying than a steady-state sound, when presented at similar L_{Aeq} values. They found that a steady state sound could be presented even 8 dB louder to have the same annoyance as an impulsive sound had. This difference is called penalty, k [dB]. The rating level, $L_{Aeq} + k$ describes annoyance better than L_{Aeq}. The penalty of impulsive sound increased with increasing onset rate and level difference. The determination of these quantities for a single impulse are described in Fig. 1.

Annoyance is the most prevalent non-auditory effect of environmental noise (Basner et al., 2014). However, due to its subjective nature, annoyance estimations have large interpersonal variations. Annoyance is often accompanied by an acute physiological stress reaction, which gives a more objective estimation of stress level. Acute stress reactions to noise may be reflected, e.g., as increased circulating stress hormone concentrations (Babisch, 2003; Radun et al., 2021) and altered heart rate variability (HRV) (Idrobo-Ávila et al., 2018; Radun et al., 2021). Also objective estimations have large interpersonal variations. Therefore, to understand better the effects of a special sound characteristic on human, a combination of annoyance and acute physiological responses is highly justified.

Exposure to sounds might cause acute physiological stress reaction

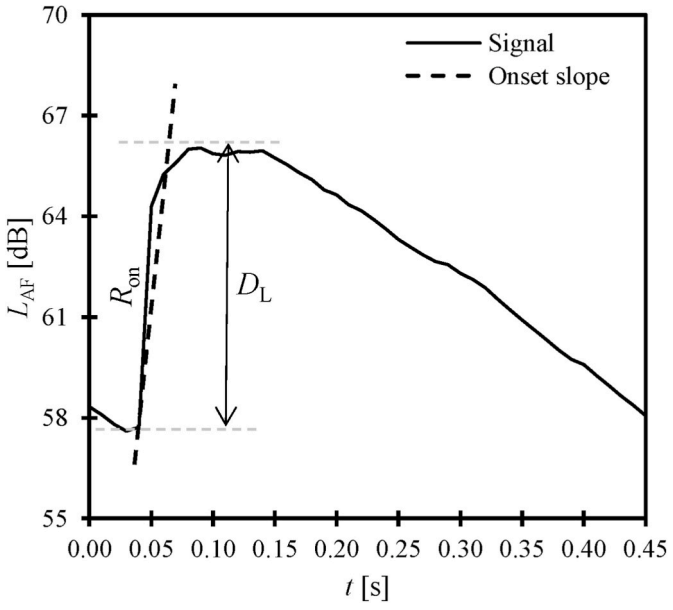

Fig. 1. Fast-time weighted SPL, L_{AF}, of a single impulse as a function of time, t, for a single impulse. The sampling time is 10 ms. Level difference, D_L [dB], and onset rate, R_{on} [dB/s], describe the strength and abruptness of the impulse. Fast corresponds to the reaction speed of hearing to rapid changes in sound (IEC, 2013).

reflected in the cardiovascular system. The SPL of white noise (50—80 dB L_{Aeq}) correlated with changes in HRV (Lee et al., 2010). White noise presented at 85 dB L_{Aeq} influenced HRV compared to no exposure indicating a physiological stress response (Björ et al., 2007). Industrial noise exposure at 95 dB was related to increased diastolic blood pressure and mean arterial pressure compared to 40 dB noise (Andrén et al., 1982). The cited studies applied quite high sound levels (≥80 dB L_{Aeq}). Therefore, they may have little relevance for residential environments. Furthermore, hearing protection is expected to be employed in, e.g., workplaces where the sound level exceeds 80 dB L_{Aeq} in European Union member states (EU, 2003).

Exposure to noise during one's current task might also elevate stress and be reflected to endocrine system. For example, when a person was solving arithmetic calculations during high sound levels (90 dB L_{Aeq}) of white noise, cortisol levels were higher than during a quieter sound condition (55–60 dB L_{Aeq}) (Miki et al., 1998). Random bursts of intermittent background noise at 90 dB L_{Aeq} consisting of superimposed traffic, office machinery, and unintelligible speech caused increased heart rate and higher circulating cortisol and noradrenaline levels when compared with quieter condition of 45 dB L_{Aeq}, but only in a high-effort situation (Tafalla & Evans, 1997). Furthermore, performing tasks under intermittent noise of 99 dB L_{Aeq} has been linked to slightly amplified cortisol responses compared with the response of 45 dB L_{Aeq} noise (Brandenberger et al., 1980). However, only performing the tasks triggered the higher cortisol response than a control condition without noise and task (Brandenberger et al., 1980).

Both exposure to noise without a task and performing tasks in the absence of noise cause independently physiological reactions. Resource-based models of performance under stress, such as compensatory control model (Robert & Hockey, 1997) and maximal adaptability model (Hancock & Warm, 1989), have explained the influence of different noise types on performance the best (Szalma & Hancock, 2011). These models state that to a working person, noise exposure can cause an additional workload when the person must increase the effort to maintain his/her performance at the same level as without the sound. Using strong efforts increases stress to such an amount that it can be observed using physiological stress meters. Low effort may only reflect on subjective responses such as feelings of annoyance and increased workload. In addition, the extra effort may not suffice to compensate for the negative impact of the disturbance, and sound can also impair performance. The magnitude of this impairment depends both on the sound and task types (Szalma & Hancock, 2011).

Our aim was to evaluate the acute effects of impulsive sound on healthy human participants performing tasks requiring constant concentration and working memory processing. To extract the pure effect of impulsivity, the effects of steady-state noise, carrying the same sound energy as the impulsive sound stimulus were also assessed. Therefore, our experiment involved impulsive sound (65 dB L_{Aeq}), steady-state sound (65 dB L_{Aeq}), and quiet sound (35 dB L_{Aeq}) with average exposure time of 49 min. Based on current knowledge, we set hypotheses in the following way:

H1. Impulsive sound causes a large negative effect compared to quiet sound;

H2. Steady-state sound causes a small negative effect compared to quiet sound;

H3. Impulsive sound causes a small negative effect compared to steady-state sound.

If the difference in stress effect is large, then the effects are expected to be seen in all types of responses, i.e., psychological, physiological, and performance as stated by resource-based models of performance under stress (Robert & Hockey, 1997; Szalma & Hancock, 2011). Small stress effects may not influence performance, since people will be able to compensate for the effects of noise by putting in more effort (Robert & Hockey, 1997). Small stress effects may only become evident as

psychological effects, but also signs of a physiological stress response may be seen.

2. Materials and methods

2.1. Design

A medical laboratory experiment was conducted with a parallel-group design, where each group was exposed to one of the three investigated sound conditions. The experiment involved three *sound conditions*: quiet sound, steady-state sound, and impulsive sound. The exposure time for each *sound condition* was the same. Gender and noise sensitivity were used to stratify the participants into three balanced groups.

2.2. Participants

A total of 61 voluntary adult participants were enrolled in the study. The inclusion criteria and the instructions given to the participants before the experiment are presented in the Supplementary material Sec. S1.1. Data of one participant was excluded from analyzes due to impaired hearing in the hearing test. One participant fainted in connection with venous cannulation and discontinued the participation. The final number of participants was thus 59 (39 women, mean age 24.8 years, range 20–42 years).

2.3. Ethical aspects

The Ethical Committee of the Hospital District of Southwest Finland approved the study (ETMK Dnro 20/1801/2018). All participants provided voluntary informed consent before participation. The participants were compensated for their effort and time with a gift voucher worth 70 Euro.

2.4. Sound condition groups

The sound condition groups were formed to include both men and women and they were balanced according to the *noise sensitivity* score of each participant. The participants filled Weinstein's 21-item *noise sensitivity* scale (Weinstein, 1978) while registering for the experiment. *Noise sensitivity* classification was performed using data collected from five previous laboratory experiments (N = 184). The data are presented in the Supplementary material Sec. S1.2. The respondents were divided into tertiles defined by the following cut-off scores: the maximum score for the low-sensitivity group was 73 points; the minimum score for the high-sensitivity group was 87 points; and scores from 74 to 86 belonged to the middle-sensitivity group. These noise sensitivity groups were only used to divide the participants into *sound conditions* in the recruitment phase. The participants were allocated to different *sound conditions* according to their gender, noise sensitivity score, and the date they could participate. Table 1 shows the division of participants into the *sound condition* groups.

The sample size of the groups was based on previously published results; the group sizes of previous similar studies have typically ranged from 8 to about 20 (Brandenberger et al., 1980; Evans & Johnson, 2000; Miki et al., 1998; Sim et al., 2015). We aimed to include 18 fully evaluable participants in each group. Since the sample size was not determined by power calculations, the sensitivity of our analysis was defined for 60 participants across three groups with 80% power (alpha = 0.05) using software package G*Power 3.1.9.7 (Faul et al., 2007). An analysis of variance (ANOVA) would be sensitive to effects of $\eta_p^2 = 0.14$ and mixed model analysis of variance (mANOVA) to effect sizes of $\eta_p^2 = 0.13$ with 2 or 4 repetitions and correlation among repeated measures 0.8. This means the study would not be able to reliably detect effects smaller than these values that correspond to the limit of large effects $\eta_p^2 = 0.14$ (Cohen, 1988).

Table 1
The number of participants in the different *sound condition groups* and their division into three *noise sensitivity* (NS) categories. The number of participants from whom all blood samples were obtained are presented in brackets. The missing blood samples were due to blocked catheters.

Sound condition	High NS	Middle NS	Low NS	Total
Quiet sound	4 (4)	7 (5)	8 (6)	19 (15)
Steady-state sound	5 (4)	7 (6)	7 (6)	19 (16)
Impulsive sound	4 (3)	8 (4)	9 (8)	21 (15)
Total	13 (11)	22 (15)	24 (20)	59 (46)

2.5. Experimental setting

The experimental room is presented in the Supplementary material Sec. S1.3.

2.6. Description of the sound conditions

Table 2 gives the objective descriptors of the *sound conditions*, and Fig. 2 illustrates the spectra (a) and time profiles (b).

All sounds were edited using Adobe Audition 3.0 (Adobe Inc., San Jose, California, USA) and MATLAB R2017b (The MathWorks Inc., Natick, Massachusetts, USA). Steady-state sound was created from pseudorandom pink noise with Graphical Equalizer in Adobe Audition. Quiet sound was created from steady-state sound by decreasing the SPL by 30 dB. Quiet sound was set to 35 dB L_{Aeq}, which was 10 dB above the background SPL of the room, 25 dB L_{Aeq}. Artificial sound was used to produce the *sound condition* Quiet sound because the background SPL of the experimental room (25 dB L_{Aeq}) was considered too silent, as sounds produced by the investigators and participants could have become audible. 35 dB is a typical target level of ventilation noise in offices, schools, and hospitals. Therefore, 35 dB sound level (corresponds to *sound condition* Quiet sound) was always present in the room, except when the experimental sound was on.

Impulsive sound was obtained from an outdoor recording at a construction site where pile driving was being carried out. Each onset caused by the pile impact causes a sharp and distinctive onset of sound level (average onset rate 236 dB/s; Table 2). People rate this kind of sound highly impulsive. The original recording was short, and it was multiplied to a 90 min long audio file, so that the looping section was inaudible.

The *sound conditions* were presented within one-third octave bands from 100 to 10 000 Hz. The experimental sounds were band-pass filtered using an 80th order Butterworth filter with cut-off frequencies of 89 and 10 500 Hz and stop-band attenuation of 60 dB. All sounds were saved as mono wav-files (16 bit, 44 100 Hz).

Table 2
The objective descriptors of the *sound conditions*. An empty value means that this acoustic property was not relevant for this *sound condition*.

Sound condition	D_L [a] [dB]	R_{on} [a] [dB/s]	L_{A5}—L_{A95} [b] [dB]	L_{Aeq} [c] [dB]
Quiet sound	–	–	1.0	35
Steady-state sound	–	–	1.0	65
Impulsive sound	8.2	236.2	8.8	65

[a] Impulsive properties of sound are measured according to the Nordtest method NT ACOU 112 (Nordtest, 2002). The descriptive quantities are level difference, D_L, which describes the strength of the impulse, and onset rate, R_{on}, which expresses how fast the impulse grows.

[b] Variability of sound was described by the difference of 5% and 95% percentiles of A-weighted SPL, L_{A5}—L_{A95}, using Fast time weighting.

[c] A-weighted equivalent SPL, L_{Aeq}, corresponds to the whole duration of the experimental phase, lasting typically 50 min.

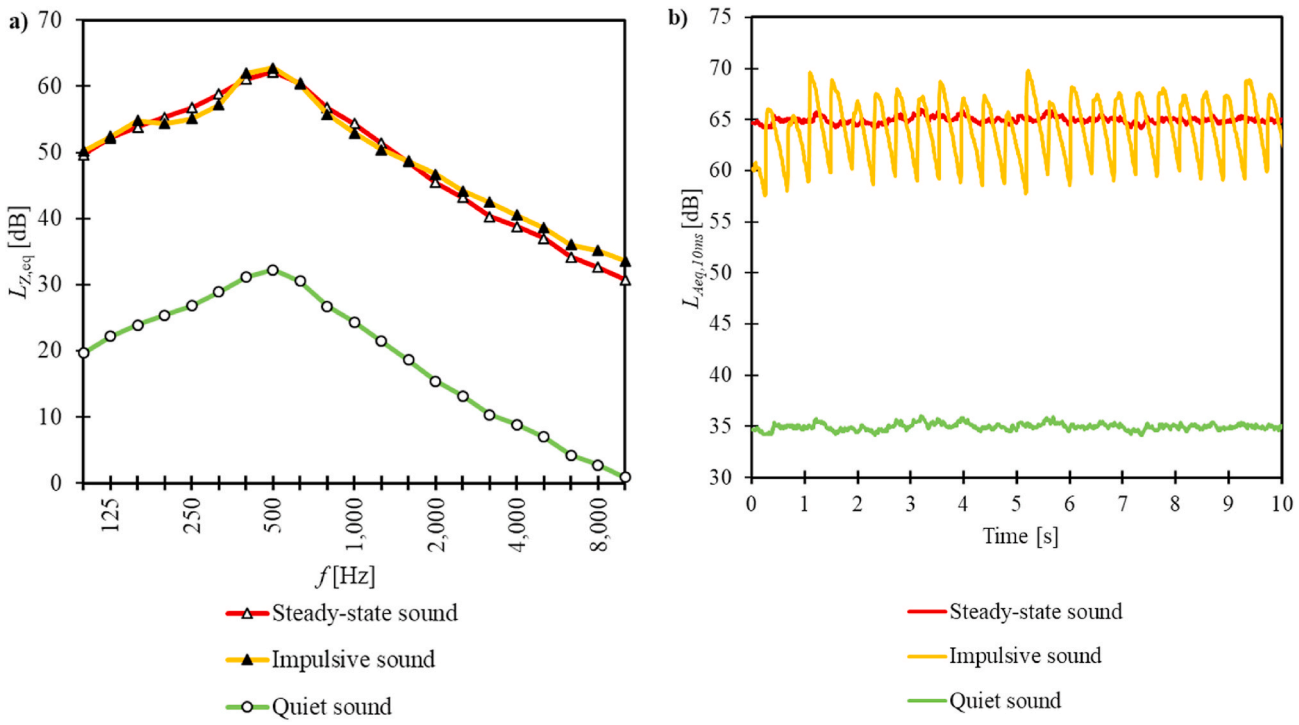

Fig. 2. (a) The unweighted equivalent SPL, $L_{Z,eq}$, as a function of the sound frequency, f, for the three *sound conditions*. (b) The A-weighted equivalent SPL, $L_{A,eq,10\ ms}$, as a function of time during a typical 10-s slice of the *sound condition*. The time profile was based on 10 ms time resolution. The equivalent SPLs during the 10-s samples, $L_{Aeq,10s}$, correspond to the values for the whole test phase when the experimental sound was on.

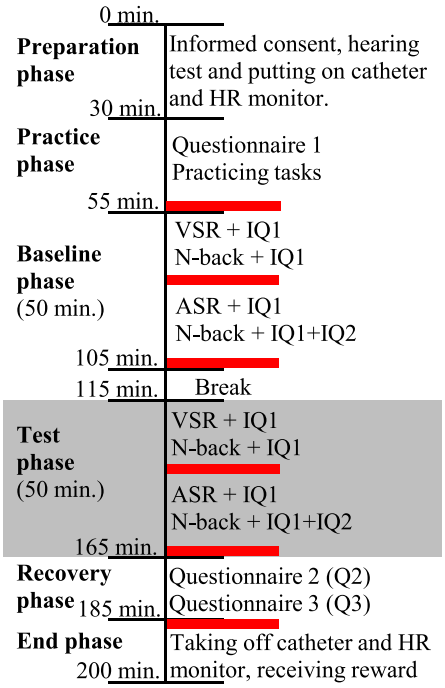

Fig. 3. Procedures of the experiment. The red lines indicate taking blood samples and measuring blood pressure (measurement times). The grey area indicates when the experimental sound was present. Each participant was exposed to one test phase, i.e., one *sound condition*. The minutes in brackets describe the duration of the phases and minutes without brackets indicate the timeline of the experiment. Q = Questionnaire, IQ=Intermediate Questionnaire, VSR=Visual Serial Recall, ASR = Auditory Serial Recall, HR=Heart rate. (For interpretation of the references to colour in this figure legend, the reader is referred to the Web version of this article.)

The spectrum of sound affects annoyance (Hongisto et al., 2015). Therefore, all *sound conditions* were equalized to have equivalent spectral shapes in one-third octave bands (Fig. 2) using the Graphical Equalizer of Adobe Audition. This was made to avoid the situation that the spectrum of sound would also be an independent variable. These three spectra were in line with standardized human speech (ISO, 2012).

2.7. Playback and measurement of sound conditions

The sounds were played using Windows Media Player 12, a Roland Rubix 22 sound card (Roland Co., Hamamatsu, Japan), and two Genelec 8020 A active loudspeakers (Genelec Ltd., Iisalmi, Finland). The SPL in one-third octave bands of each *sound condition* was measured at four locations in the experimental room. The locations approximately corresponded to those of the subjects' ears during the experiment. The measurements were made using a sound level meter (NTi Audio XL2, NTi Audio AG, Schaan, Liechtenstein), a microphone (NTi Audio M2211, NTi Audio AG), and a preamplifier (NTi Audio MA220, NTi Audio AG). The spectra of the *sound conditions* were adjusted so that the measured spectrum in each of the four measurement locations corresponded to the target spectra shown in Fig. 2a. The acoustic analyses of Fig. 2 and Table 2 were done using MATLAB.

2.8. Psychological variables

The psychological dependent variables are presented in Table 3. Besides aggregated rating scales (e.g. SOFI), annoyance and workload were treated as continuous variables, since this can be done for aggregated rating scales as well as for individual rating items with numerical response formats and at least five categories (Harpe, 2015).

2.9. Performance variables

During the experiment, the participants performed three tasks, which were presented using MATLAB R2015a with Psychtoolbox – 3

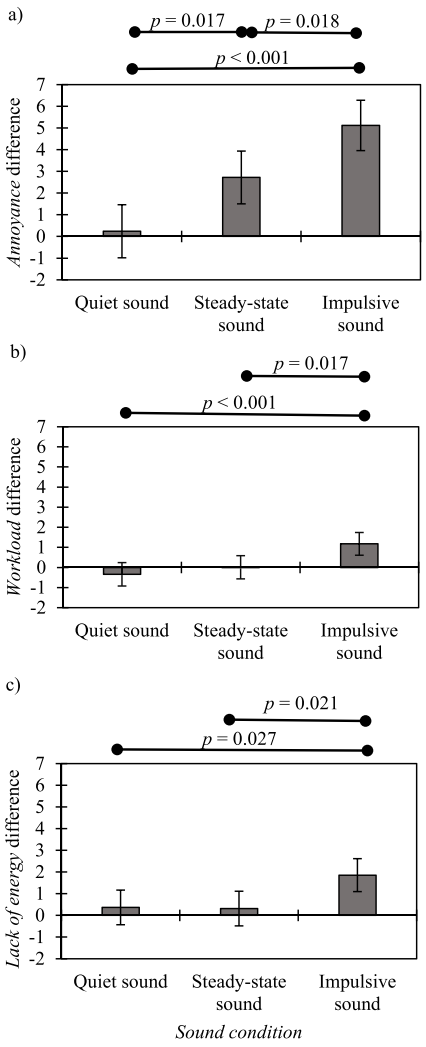

Fig. 4. Psychological measures (*annoyance*, *workload*, *lack of energy*) showing significant main effect of *sound condition*. The bars represent means and error bars 95% confidence intervals. The lines above the graphs represent statistically significant differences.

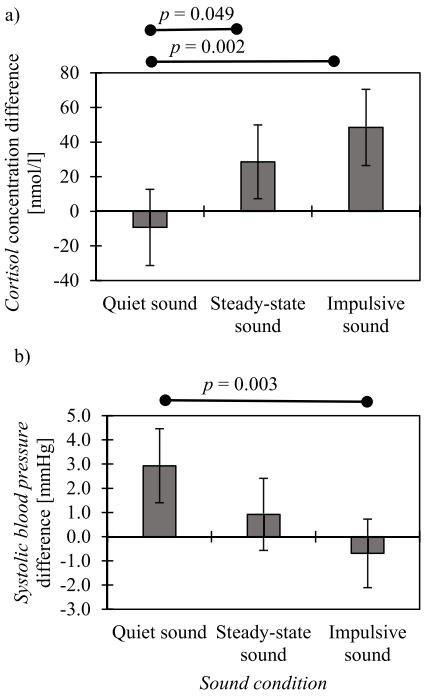

Fig. 5. Physiological measures (*cortisol*, *systolic blood pressure* SBP) showing significant main effect of *sound condition*. The bars represent means and error bars 95% confidence intervals. The lines above the graphs represent statistically significant differences.

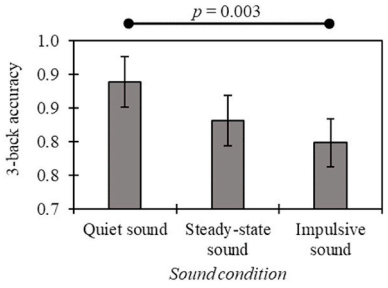

Fig. 6. Performance measures with a significant main effect on *sound condition*. Accuracy is the proportion of correct answers in 3-back task. The bars represent means and error bars 95% confidence intervals. The line above the graph represents a statistically significant difference.

(PTB; psychtoolbox.org) (Brainard, 1997). The tasks were N-back with four variations (0, 1, 2, and 3-back), visual serial recall (VSR), and auditory serial recall (ASR). The tasks are presented in detail in the Supplementary material Sec. S1.4 and performance variables in Table 3.

2.10. Physiological variables

Stress hormones cortisol and noradrenaline were measured from venous blood utilizing a peripheral venous access catheter that was placed in the participants' forearm in the beginning of the experiment. Blood pressure (BP) was recorded with an indirect blood pressure monitor (Omron M3 Comfort, Omron Healthcare Co., Ltd., Kyoto, Japan). HRV was measured with a sensor (Faros 180, Bittium Biosignals Ltd., Kuopio, Finland) attached to the participant with a textile belt and Stingray adapter, positioned under the chest muscle line. The physiological measurements are presented in detail in the Supplementary material Sec. S1.5 and physiological variables in Table 3.

2.11. Experimental procedure

The procedure is shown in Fig. 3. Experimental sessions always started at 11.45 a.m. One or usually two participants attended each session. After arrival, the participant read and signed the informed consent form. During the preparation phase, the heart rate monitor was put on, the peripheral venous access catheter was inserted, and hearing was tested with a Screening Audiometer (Madsen Micromate 304, Otometrics, Taastrup, Denmark).

The practice phase included the completion of Questionnaire 1 (Q1), and explaining and practicing all tasks one-by-one. The baseline and test phases were identical apart from the fact that the *experimental sound* was on in the test phase. The tasks were presented in the following order in both phases: *VSR, N-back, ASR*, and *N-back*. After each task, the participants filled Intermediate Questionnaire 1 (IQ1), and after the whole phase, they filled Intermediate Questionnaire 2 (IQ2). There was a break between the baseline phase and the test phase. The baseline phase lasted an average of 51 min (range, 44 min–61 min), and the test phase lasted an average of 49 min (range, 42 min–58 min), which was the same as the sound exposure time.

The recovery phase started when the *experimental sound* was changed to quiet sound, or when the fifth blood samples had been taken. During the recovery phase, participants completed a personality questionnaire (Konstabel et al., 2012) (Q2) and Questionnaire 3 (Q3), with general

Table 3
The dependent variables of the study.

Dependent variable	Name or description of variable	Response/unit	Range	Position (See Fig. 3)
Background information				
Noise sensitivity	21-item Noise sensitivity scale (Weinstein, 1978)		21—126	Recruitment questionnaire
General stress	Perceived Stress Scale PSS-10 (S. Cohen et al., 1983)		0—40	Q1
Psychological measures				
Annoyance	How much does the sound annoy, disturb, or bother you? (ISO, 2003)	0 Not at all, 10 Extremely	0—10	IQ1 & IQ2
Workload	How demanding/loading was performing the previous task in your opinion?	0 Not at all, 10 Extremely	0—10	IQ1 & IQ2
Perceived fatigue	Swedish Occupational Fatigue Inventory SOFI (Åhsberg & Gamberale, 1998)	1 Not at all, 2 Slightly, 3 To some extent, 4 Quite a lot, 5 Very much		IQ2
Tiredness	sleepy, yawning & drowsy (0.62, 0.66)[a]		3—15	
Lack of energy	worn out, exhausted, drained (0.83, 0.88)[a]		3—15	
Lack of motivation	uninterested, indifferent, passive (0.82, 0.89)[a]		3—15	
Performance measures				
N-back RT	0, 1, 2, 3-back reaction time	seconds		Twice in baseline and test phases
N-back accuracy	0, 1, 2, 3-back accuracy	Mean Accuracy	0—1	Twice in baseline and test phases
Auditory serial recall (ASR)	Remembering 9 numbers presented in random order via headphones.	Accuracy per position	0—1	Once in baseline and test phases
Visual serial recall (VSR)	Remembering 9 numbers presented in random order on display.	Accuracy per position	0—1	Once in baseline and test phases
Physiological measures				
Blood pressure				Six times during the experiment
Systolic blood pressure	Systolic blood pressure	mmHg		
Diastolic blood pressure	Diastolic blood pressure	mmHg		
HRV				Continuously measured
$HRV_{LF/HF}$	LF/HF ratio during task performance			
Stress hormone concentrations				Six times during the experiment
Cortisol	Concentration in plasma, in blood collected from a peripheral venous catheter	nmol/l		
Noradrenaline		nmol/l		

Q1 = Questionnaire 1; IQ1 = Intermediate Questionnaire 1; IQ2 = Intermediate Questionnaire 2.
[a] Cohen's alpha for the scales in baseline and test phases.

questions concerning their condition and experiences regarding the experiment. Blood sampling and recording of BP were repeated six times over the entire experiment. To control for the potential stress effect of catheter insertion, there was always at least 30 min time difference between catheter insertion and collection of the first blood samples. In addition, the last blood sample was taken at least 20 min after the end of the *experimental sound* exposure.

One experimental session lasted an average of 3 h 22 min (range: 2 h 55 min to 4 h 11 min).

2.12. Statistical analyses

Statistical analyses were conducted with IBM SPSS Statistics for Windows, Version 25 (IBM Corp., Armonk, NY, USA). *Sound condition* was always defined as the between-group variable having three levels (Quiet sound, Steady-state sound, and Impulsive sound). If this main effect was significant, pairwise comparisons between the *sound conditions* were conducted. To ensure that the distribution of dependent variable values did not differ from normal, the normality and outliers were examined with the Kolmogorov-Smirnov test of normality, and kurtosis and skewness values (between −2 and 2). If either of these conditions were met, parametric analysis was performed; in other case, outliers were examined. If the removal of one or two outliers was not enough to provide normality, non-parametric tests were used. Due to multiple comparisons examining the effects of sound, Benjamini-Hochberg procedure was used for the main effects of *sound condition* and Bonferroni correction was used for pairwise tests. Benjamini-Hochberg controls for false discovery rate, which means it takes into account that some findings might be false positives (McDonald, 2014). This means that the *p*-values of all 14 tests examining the effects of psychological, physiological and performance measures were examined with Benjamini Hochberg procedure (altogether 14 tests, see e.g. Table S2). The Benjamini-Hochberg false discovery rate was set to 0.05, that can be considered rather strict (McDonald, 2014). In the results, the raw *p*-values are reported and the significance of Benjamini-Hochberg procedure is mentioned only if it is in conflict with the raw *p*-value.

To ensure that the groups were comparable at baseline, the groups' background information as well as performance in the baseline phase was examined. For their gender distribution, the χ^2-test was used, for *age* Kruskal-Wallis H test for independent samples (not normally distributed) and other variables were compared with ANOVA or mANOVA. In *general stress*, two participants had missed one rating, which was replaced by their median value.

For the test phase's psychological and physiological variables, difference values were calculated to reduce the effect of inter-subject differences. Difference values showed the change due to the *sound condition* in relation to a reference value. The reference values were deducted from the test phase values (test phase value minus reference value). The reference value was the baseline phase value for all other psychological and physiological variables except for *cortisol*. For *cortisol*, the recovery phase value was selected as the reference value because of the diurnal variation and other variability in the *cortisol* values of the baseline phase samples. It is well-known that cortisol concentrations in plasma show strong diurnal variation, with the highest levels in the morning, and awakening time thus influences the concentrations during the day (Kudielka & Kirschbaum, 2003). For this reason, the participants were instructed to wake up the latest at 8 a.m., and all experimental sessions were conducted in the early afternoon. The changes in *cortisol* as a

function of time in our experiment are presented in Figure S3 of the Supplementary material. *Cortisol* concentrations did not differ between the three *sound condition* groups in the recovery phase ($\chi^2(2) = 0.2$, $p = 0.927$, $E^2 = 0.003$). The values of the physiological variables, measured six times during the experiment, are presented as a function of time in Figures S3–S6 of the Supplementary material.

For the difference values, the parametric tests used were ANOVA or mANOVA. When there was more than one measurement of the dependent variable in the test phase, mANOVA was used with repetition (2) during the test phase as a within-subject variable, otherwise ANOVA was used. In within-subject comparisons, the Greenhouse-Geisser correction was used if sphericity could not be assumed. If the normality conditions were not met, either one outlier was removed, or non-parametric tests were used. In addition, if the measurements were repeated several times in the test phase, the distribution of the mean values was examined and used if the conditions for normality were filled.

For the performance measures, difference values were not used due to the variation in performance in the baseline phase. We hypothesized this variation reflected learning effect or excitement. Therefore, only the test phase values were examined. In *serial recall tests*, mANOVA was used with the proportion of correct answers per position (9) as the within-subject variable. For *N-back RT*, mANOVA was used, with repetition (2) and N-back level (4) as within-subject variables. In *N-back accuracy*, only the accuracy of *3-back* was distributed sufficiently normally to use mANOVA with repetition (2) as a within-subject variable. For the other versions of N-back, the Kruskal-Wallis H test for independent samples was used with Epsilon squared as the measure of effect size.

The exact results with and without including outliers are reported in the Supplementary material (Tables S1, and S2). In addition, the results with *general stress* as a covariate are reported in Table S3, but since the results are the same as without the covariate and outliers, the reported results are based on the examination without a covariate reported in Table S1. The table of the main results is presented in the Appendix Fig. A.1.

3. Results

3.1. Baseline comparisons

The *sound condition* groups did not differ from each other in terms of gender distribution ($\chi^2(2) = 4.1$, $p = 0.128$, $V = 0.264$), *age* ($\chi^2(2) = 0.0$, $p = 0.987$), *noise sensitivity* ($F(2, 56) = 1.0$, $p = 0.389$, $\eta_p^2 = 0.033$), but there was a difference in the perceived level of *general stress* ($F(2, 56) = 4.2$, p=0.018, $\eta_p^2 = 0.133$). The Impulsive sound group scored lower in *general stress* (mean = 7.4; CI 5.3—9.5) than the Steady-state sound group (mean = 11.6; CI 9.4—13.8; $p = 0.024$), but did not differ from the Quiet group (mean = 10.8; CI 8.6—13.0; $p = 0.096$). The *sound condition* groups did not differ from each other in the performance accuracy of the baseline phase (*ASR*: $F(2, 56) = 0.2$, p=0.821, $\eta_p^2 = 0.007$; *VSR*: $F(2, 56) = 0.2$, p=0.849, $\eta_p^2 = 0.006$; *3-back*: $F(2, 54) = 1.7$, p=0.199, $\eta_p^2 = 0.058$).

3.2. Psychological measures

Annoyance depended on the *sound condition* ($F(2, 56) = 16.9$, $p < 0.001$, $\eta_p^2 = 0.376$) (Fig. 4a). Statistically significant differences were found between all *sound condition* pairs. Quiet sound was less annoying than Steady-state sound ($t(36) = -2.7$, $p = 0.017$, $d = 0.86$) or Impulsive sound ($t(38) = -7.1$, $p < 0.001$, $d = 2.24$), and Impulsive sound was more annoying than Steady-state sound ($t(38) = -2.6$, $p = 0.018$, $d = 0.84$).

Workload was higher during Impulsive sound than during Steady-state sound ($t(38) = -3.6$, $p = 0.017$, $d = 1.13$) or Quiet sound ($t(38) = -3.5$, $p < 0.001$, $d = 1.11$) ($F(2, 55) = 7.8$, $p = 0.001$, $\eta_p^2 = 0.220$; Fig. 4b).

Lack of energy was also higher during Impulsive sound than during Steady-state sound ($t(38) = -2.8$, $p = 0.021$, $d = 0.89$) or Quiet sound ($t(38) = -2.7$, $p = 0.027$, $d = 0.86$) ($F(2, 56) = 5.1$, $p = 0.009$, $\eta_p^2 = 0.115$; Fig. 4c), but there were no statistically significant differences between the *sound conditions* in *tiredness* ($F(2, 56) = 0.1$, $p = 0.947$, $\eta_p^2 = 0.002$) or *lack of motivation* ($F(2, 56) = 1.0$, $p = 0.380$, $\eta_p^2 = 0.034$).

3.3. Physiological measures

Cortisol concentrations in plasma depended on the *sound condition* ($F(2, 43) = 7.2$, $p = 0.002$, $\eta_p^2 = 0.252$) (Fig. 5a). During Impulsive sound ($t(28) = -3.4$, $p = 0.002$, $d = 1.25$) and Steady-state sound ($t(29) = -2.3$, $p = 0.049$, $d = 0.81$), *cortisol* was higher than during Quiet sound. Therefore, during Quiet sound, the diurnal nadir of the day was already reached, whereas the other *sound conditions* prevented this.

Also concentrations of *noradrenaline* in plasma was affected by *sound condition* ($F(2, 47) = 3.3$, $p = 0.046$, $\eta_p^2 = 0.123$). However, Benjamini-Hochberg procedure for false discovery rate indicated that the effect is not significant. In addition, none of the pairwise comparisons were significant ($p > 0.05$).

Sound condition influenced also *systolic blood pressure* ($F(2, 55) = 6.1$, $p = 0.004$, $\eta_p^2 = 0.181$) (Fig. 5b). Impulsive sound was associated with lower *systolic blood pressure* than Quiet sound ($t(37) = 3.8$, $p = 0.003$, $d = 1.21$). *Sound conditions* did not differ from each other in *diastolic blood pressure* ($F(2, 55) = 2.1$, $p = 0.133$, $\eta_p^2 = 0.071$) or $HRV_{LF/HF}$ ($F(2, 54) = 0.5$, $p = 0.633$, $\eta_p^2 = 0.017$).

3.4. Performance measures

Sound condition influenced 3-back accuracy ($F(2, 56) = 6.2$, $p = 0.004$, $\eta_p^2 = 0.181$) (Fig. 6). The 3-back performance was lower during Impulsive sound than Quiet sound ($t(39) = 3.3$, $p = 0.003$, $d = 1.04$). In the other versions of the N-back task, the *N-back accuracy* did not differ between the *sound conditions* (1st N-back: 0-back: $\chi^2(2) = 2.0$, $p = 0.365$, $E^2 = 0.036$; 1-back: $\chi^2(2) = 1.2$, $p = 0.542$, $E^2 = 0.020$; 2-back: $\chi^2(2) = 2.1$, $p = 0.353$, $E^2 = 0.039$; 2nd N-back: 0-back: $\chi^2(2) = 0.4$, $p = 0.823$, $E^2 = 0.007$; 1-back: $\chi^2(2) = 0.6$, $p = 0.757$, $E^2 = 0.011$; 2-back: $\chi^2(2) = 1.3$, $p = 0.526$, $E^2 = 0.021$). *N-back RT* was not affected by *sound condition* ($F(2, 55) = 2.2$, $p = 0.117$, $\eta_p^2 = 0.075$).

Other tasks did not show significant effects of *sound condition* (*ASR*: $F(2, 56) = 0.5$, $p = 0.631$, $\eta_p^2 = 0.016$; *VSR*: $F(2, 56) = 1.3$, $p = 0.286$, $\eta_p^2 = 0.044$).

4. Discussion

4.1. Analysis of results

Our study is to our knowledge the first experimental study to explore the effects of impulsive sound on a working persons' physiological and psychological stress responses and cognitive performance. Impulsive sound 65 dB L_{Aeq} was compared with two other types of sound: quiet sound 35 dB L_{Aeq} and steady-state sound 65 dB L_{Aeq}. Quiet sound presented a condition without noise load, whereas Steady-state sound presented a sound at the same sound level as Impulsive sound, but without a special character. Compared to Quiet sound, Impulsive sound was more annoying, loading, caused lack of energy, and higher cortisol levels in plasma indicating an acute stress response. In addition, Impulsive sound decreased performance accuracy in the 3-back task compared to performance during Quiet sound. Therefore compared to Quiet sound, Impulsive sound caused more psychological and physiological stress and decreased performance, which confirmed hypothesis H1. Impulsive sound differed from Quiet sound in psychological, physiological, and performance effects. However, systolic blood pressure was lower during Impulsive sound than Quiet sound, which is opposite to our expectations. Compared to Steady-state sound, Impulsive sound was considered more annoying, loading, and causing lack of energy. Thus, the subjective estimations of the impact of Impulsive sound and Steady-state sound were different, which indicates that working during

Impulsive sound was subjectively more stressful (H3). No difference in physiological and performance effects indicate small effect. The reason why exposure to Impulsive sound and Steady-state sound did not result in different physiological and performance effects is the effect of an elevated sound level (i.e., noise) as such. Already, the Steady-state sound (carrying no impulsive character) differed from Quiet sound in psychological and physiological measures. Steady-state sound caused more annoyance and raised plasma cortisol levels compared to Quiet sound, which means that already raising the sound level caused negative effects (H2). Taken together, working during Impulsive sound caused effects seen in one or several physiological, psychological, and performance measures compared to Quiet sound. Part of this stress effect was due to the increased sound level (as shown by condition Steady-state sound), but there was also an extra effect not attributable to the increased sound level as such.

Exposure to both Steady-state sound and Impulsive sound increased circulating cortisol concentrations compared to Quiet sound. This result agrees with several studies that have examined the influence of noise on a working person. A study examining steady-state noise exposure at 90 dB L_{Aeq} while working on arithmetic tasks found elevated cortisol levels after the exposure when compared with a condition with steady-state noise of 55–60 dB L_{Aeq} (Miki et al., 1998). In addition, working during intermittent two-intensity level broad-band noise 99 dB L_{Aeq} was related to a slight raise in cortisol concentration compared with exposure to 45 dB L_{Aeq} noise (Brandenberger et al., 1980). However, just working on the tasks, without the noise, increased cortisol levels compared to a baseline without tasks and noise (Brandenberger et al., 1980). The impact of the cognitive tasks is also evidenced by a study where an increase in cortisol concentrations was related to intermittent background noise at 90 dB L_{Aeq}, but only in a high-effort situation (Tafalla & Evans, 1997). Therefore, elevated cortisol concentrations might reflect the greater effort needed to perform the task during the noise exposure. Furthermore, since the cortisol responses to Steady-state sound and Impulsive sound in our study did not differ, this might indicate that the sound level plays a crucial role in triggering the cortisol response during mental work.

In general, a meta-analysis of noise effects on performance concluded that performance accuracy would be more affected by noise than speed and that SPL of noise itself may not be of central importance for performance (Szalma & Hancock, 2011). Our results are in accordance with these conclusions. Impulsive sound decreased 3-back accuracy compared to performance in Quiet sound, but reaction times were not affected. In addition, Steady-state sound and Quiet sound did not differ in performance.

The Impulsive sound had a fixed frequency of 2 Hz. The level difference was relatively small (D_L = 8.2 dB) because the impulse frequency was so high (previous impulse could not decay properly while the next already begun). However, the onset rate was large (236 dB/s; see Table 2; Fig. 2). These parameters together lead to an expected penalty of $k = 7.1$ dB according to the penalty model of Nordtest (2002). This means that Steady-state sound must be played 7.1 dB louder than Impulsive sound to produce the same annoyance rating. According to Rajala and Hongisto (2020), the annoyance penalty due to impulsive sound increases with increasing D_L. D_L values up to 40 dB are usual for many impulsive sounds occurring in our daily life. It is, therefore, justified to expect that impulsive sound having larger D_L could lead to stronger adverse effects than our study could reveal. It is justified to study in the future how the prominence (or annoyance penalty) of impulsive sound affects people.

An unexpected result was that during exposure to Impulsive sound, systolic blood pressure was lower than during Quiet sound. A similar trend can be also seen in the noradrenaline levels in plasma, where the raw p-value between Impulsive sound and Quiet sound was under 0.05, but after Benjamini-Hochberg correction the difference was not significant and pairwise comparisons were non-significant. These two variables were expected to show similar reactions, since the catecholamine neurohormones noradrenaline and adrenaline regulate heart rate and blood pressure (McEwen, 2007). However, the possible effect was expected to be the opposite. In previous studies, even loud noise levels (90—99 dB L_{Aeq}) have not influenced circulating noradrenaline levels (Brandenberger et al., 1980; Miki et al., 1998) and noise exposure of 95 dB had no influence on systolic blood pressure, but increased diastolic blood pressure (Andrén et al., 1982). However, when study participants were performing tasks requiring high effort, 90 dB L_{Aeq} noise raised noradrenaline levels (Tafalla & Evans, 1997). In their study, the effort was manipulated by giving feedback on the task performance. Our tasks without feedback might have more variation in the effort that participants put in them. Therefore, no difference in noradrenaline levels or in systolic blood pressure would be in accordance with most previous studies.

Steady-state noise exposure at sound levels between 50–80 dB L_{Aeq} was correlated with changes in the LF/HF ratio of HRV (Lee et al., 2010). The *sound conditions* in our study did not differ in this same measure of HRV, which might be due to lower sound levels in our study or the fact that their study was a within-subject cross-over study and our was a parallel-group study. A third difference is that our sound exposure was presented during mental work. Therefore, already Quiet sound involved elements causing stress since there were tasks to be performed.

4.2. Strengths and limitations

Strengths of our study included well-controlled *sound conditions* and the fact that the different effects of sound exposure were widely measured, considering psychological, physiological, and performance effects. Furthermore, we used conservative Benjamini-Hochberg procedure for false discovery rate for the main effects and Bonferroni correction for multiple comparisons to make sure that any differences reported are robust. Even though, our sample size enabled us to detect reliably only large effects, our study shows that large differences exists between these sound conditions in psychological, physiological, and performance responses. This enabled us to examine the hypothesis that were based on the resource-based models of performance under stress and not on effect sizes per se.

The *sound conditions* were designed to explore the effects of basic sound characteristics, i.e., sound level and impulsiveness. However, the results could have been different with the selection of different kind of impulsive sound. Furthermore, in our study the participants had practiced the tasks well before the sound exposure, since both practice and the baseline phase were presented before the test phase. Practicing the tasks might diminish the variability of performance making it more stable, since more variability was seen in performance in the baseline phase. Due to this variability, it is important that all participants practiced the task the same amount before the sound exposure. The shorter exposures and new tasks might show different results. In addition, the acute effects observed in our experiment cannot be directly translated to any long-term effects, which determine the ultimate health effects of environmental noise exposure. Therefore, studies on long-term noise exposure are needed where the noise exposure is carefully controlled.

5. Conclusions

We investigated the effects caused by exposure to impulsive sound (65 dB) on a person working with tasks needing constant concentration. We compared impulsive sound to two reference *sound conditions*, which were quiet sound (35 dB) and steady-state sound (65 dB). Impulsive sound differed from Quiet sound in its effects on psychological and physiological measures and performance. Psychological measures separated the effects related to impulsive sound and steady-state sound. Already, exposure to steady-state sound increased circulating cortisol concentrations compared to quiet sound, i.e., caused an acute physiological stress effect. Therefore, for impulsive sound, some of the observed effects may be related to the sound level as such, but a small

extra effect of the special sound characteristic of impulsivity was also present. The present results indicate that impulsive sound might generate stronger annoyance if a person is working during the sound exposure compared to just hearing the sound. Exposure to impulsive sound causes psychological and physiological load and decreases performance. Therefore, environmental noise control ought to pay extra attention to impulsive noise, especially in settings where cognitive work is required.

CRediT authorship contribution statement

Jenni Radun: Methodology, Software, Investigation, Formal analysis, Visualization, Writing – original draft. **Henna Maula:** Methodology, Investigation, Formal analysis, Writing – review & editing. **Ville Rajala:** Resources, Software, Investigation, Writing – review & editing. **Mika Scheinin:** Supervision, Methodology, Formal analysis, Resources, Writing – review & editing. **Valtteri Hongisto:** Conceptualization, Methodology, Resources, Supervision, Project administration, Funding acquisition, Writing – original draft.

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Appendix A. Supplementary data

Supplementary data to this article can be found online at https://doi.org/10.1016/j.jenvp.2022.101819.

Appendix

Variable	Pair of *sound conditions*		
	Quiet vs. Steady-state sound	Quiet vs. Impulsive sound	Steady-state vs. Impulsive sound
Psychological measures			
Annoyance			
Workload			
Tiredness	-	-	-
Lack of energy			
Lack of motivation	-	-	-
Physiological measures			
Cortisol [nmol/l]			
Noradrenaline [nmol/l]	-	-	-
SBP [mmHg]			
DBP [mmHg]	-	-	-
HRV $_{LF/HF}$	-	-	-
Performance measures			
Auditory serial recall accuracy (ASR)	-	-	-
Visual serial recall accuracy (VSR)	-	-	-
N-back RT	-	-	-
3-back Accuracy			

- = no main effect, therefore, comparison not performed.
= indicates lower stress
= indicates higher stress
= indicates no significant difference

Fig. A.1. The main results of the experiment. The pairwise comparisons' statistically significant effects and their directions are presented.

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By: OAH on 10/5/2023 at 9:16pm
Elizabeth Wefel Attachment

COALITION OF GREATER MN CITIES

DEDICATED TO A STRONG GREATER MINNESOTA

October 3, 2023

William Moore
Office of Administrative Hearings
600 North Robert Street
P.O. Box 64620
St. Paul, MN 55164

Re: Planned New Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas, *Minnesota Rules*, Chapter 7001; Revisor's ID Number R04805

Dear Mr. Moore,

On behalf of the Coalition of Greater Minnesota Cities (CGMC), I am writing to provide comments as the Minnesota Pollution Control Agency ("MPCA" or the "agency") begins to formulate rules governing Cumulative Impacts (CI) analysis. The CGMC is a group of more than 100 cities throughout the state dedicated to developing viable progressive communities for families and businesses through good local government and strong economic growth. Although our cities are not directly impacted by the rules, our members are interested in the outcome due to the potential effect on regional and statewide economic growth and environmental quality.

Minnesota has a strong interest in protecting disadvantaged communities who face disparate health impacts resulting from disproportionate exposure to pollutants. Without carefully crafting the CI framework, however, this new program has the potential to stifle economic growth, which could have the adverse impact of worsening health outcomes due to income and job loss. If the CI framework is too broad or too onerous for companies who are good environmental stewards and who seek to expand or even continue operating, those companies may choose to relocate elsewhere. We have already seen this happen in Greater Minnesota due to the other challenges of Minnesota's regulatory climate. We do not want to see this issue worsen.

As the agency moves forward with implementing the CI program, we urge the MPCA to focus on the neighborhoods and communities that the legislation was designed to protect: those who have suffered from disproportionate exposure to pollution. It should do so in a way that ensures overall health and well-being outcomes do not worsen through the loss of family-supporting jobs and economic development. The comments below highlight important factors the agency should consider as it develops its framework.

Benchmarks for Requiring Analysis Should Narrowly Focus on Increased Burdens to Overburdened Communities

Because the criteria for environmental justice (EJ) areas include an income criterion set at the national level as well as a one-mile buffer zone, substantial portions of the covered geography are potentially subject to the CI framework regardless of current or future air quality. Requiring CI analysis or mitigation in areas where the environmental quality is good will not improve the health and well-being of overburdened neighborhoods. It will likely stifle economic development and investment. Therefore, the MPCA should adopt benchmarks so that CI analysis is required only in EJ communities that are currently overburdened by air pollution or who are potentially at high risk. Without such a screen, neighborhoods that are considered EJ areas primarily due to lack of jobs and economic development could see worse outcomes in the future because businesses will be discouraged from investing.

When determining whether to require CI review and any resulting mitigation, the agency should also consider whether issuance of a permit could result in substantial incremental growth in local air pollution. When a permit is up for renewal, or a requested amendment will result in emissions at or below currently permitted levels, review should not be required for facilities with no history of substantial permit violations. In those circumstances where the impact on the baseline air quality is negligible, CI review should be limited to facilities with a recent history of bad behavior.

Existing facilities are often part of the fabric of the community, providing good-paying jobs and supporting other local businesses. A company may choose not to expand and add jobs or to install upgraded equipment that could lessen the pollution in the area if the burdens imposed by the CI review are too great. In situations where a company can relocate its facility, the loss of jobs and spinoff investment will likely worsen the socioeconomic burden and health outcomes in that neighborhood.

The Cumulative Impacts Analysis Process Should Be Streamlined to Prevent Unintended Results

Minnesota's robust regulatory requirements already give companies pause when they look to expand or even continue doing business in Minnesota. The CI process should be designed so that it is not so burdensome as to drive away economic development by good corporate citizens. The CI legislation requires that, to simply apply for a new, renewed, or amended permit, the applicant must provide a preliminary analysis of whether the permitted activity will impact the environment and health of EJ residents, as well as provide information and data necessary to determine if benchmarks will be exceeded. If this data gathering and analysis is too arduous, a company may choose not to proceed with a renewal, expansion, or even the addition of equipment that will potentially lessen pollution. Worse yet, it could choose to relocate to a community that faces similar burdens but is not covered by the law.

Minnesota should look at how other states have designed their CI processes and identify ways to streamline them. For example, the data necessary to do the initial screening for the permit application should be readily downloadable from a single database that companies can easily

access when applying for a new, amended, or renewed permit. The burden associated with the initial application should not scare away potential upgrades or investments.

In conclusion, the MPCA is facing important choices as it designs a CI framework. We urge the agency to proceed in a manner that will protect the health and environment of our most vulnerable citizens while ensuring that Minnesota's economy continues to thrive and grow. If you have any questions, please contact me or our attorney, Elizabeth Wefel, at eawefel@flaherty-hood.com.

Sincerely,

Rick Schultz, Mayor of St. Joseph
President, Coalition of Greater Minnesota Cities

RECEIVED
By: OAH on 10/6/2023 at 9:11am
Shalini Gupta
Attachment

October 6, 2023

RE: Planned New Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas, Minnesota Rules, chapter 7001; Revisor's ID Number R-04805

Dear William Moore,

Community Members for Environmental Justice (CMEJ) appreciates the opportunity to provide comments on the Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas.

Benchmarks. Benchmarks for action should be a comparative analysis. If the risk or impact or pollution in that area is greater than the average for the entire state or county, then action should be taken to reduce that impact locally. During the permitting process, focus should be on reducing and limiting impacts from pollution on local communities. If a facility is receiving an air permit of any kind, they should be reducing their pollution that's most impacting the local residents, particularly people of color, low-income people, and people with limited English proficiency. This should include both criteria pollutants and air toxics. Notice of permitting work should be provided directly to everyone living within the impact of that facility's pollution. Pollution moves around in the air and the impact from facilities can be up to several miles away.

Required content of a cumulative impacts analysis. The real and measurable impacts from racism should be included in all cumulative analyses and called out explicitly. You can not address disproportionate impacts if you don't take into account the impacts from racism. A 2014 University of Minnesota Study showed people of color are exposed to nearly 40 percent more polluted air than whites, and Minnesota is among the top 15 states in the nation with the largest exposure gaps between people of color and whites. Racism as both interpersonal discrimination and as a structural form of oppression disproportionately negatively impact the health outcomes of people of color. Pollution has greater negative impacts due to the systems that disadvantage people of color and this compounding effect should be represented in analyses. These disparities must be addressed directly with race and racism included intentionally. Anything else fails to address disparity that exists and further disadvantages people of color. The MPCA must show direct action in mitigating its role in perpetuating structural racism and the racially disparate health outcomes in our state.

Community Benefit Agreements. Community Benefit Agreements (CBA) should involve the community, and be between the MPCA and the company. The CBAs should benefit the community impacted and especially benefit community members of historically marginalized identities, whose demographics triggered the area as being defined as an environmental justice area (community members of color, low-income community members, and limited English proficiency community members). These community members must be invited to be involved in the creation of the benefits agreement as impacted individuals, not just through third-party organizations or local governments that may not have connections with all residents in the area. CBAs should also include local impacts from nonpermitted activities, such as reducing noise and preventing diesel truck traffic from traveling through already burdened communities. The MPCA must use its full authority to enforce the community benefits agreement. And where a CBA is broken, any permit obtained should immediately be revoked.

Priority of the benefits within the community must be developed by those living within the community, with priority given to the needs of people from the communities that define environmental justice areas. Gentrification and displacement is still an issue. And while anyone living in environmental justice areas may be

impacted, many newer residents will not bear the same burden if they have means and privilege to move elsewhere or receive adequate health care or take time off from work to care for sick family members.

Meaningful engagement requires a tailored engagement approach of that impacted geography/population, and EJ communities being given the tools and resources to understand the technical aspects of a project to effectively provide comment and participate. Critically, any meaningful engagement must include outcome, not just process – namely the ability to affect the results positively to the benefit of impacted communities. Feeling "heard" is not enough.

The MPCA should track and show how disproportionately impacted people, particularly people of color, low-income people, and people with limited English proficiency, are being included and communicated with during the permitting process, as well as how community involvement impacted the outcome. Nothing should be created about us, without us.

Offsets as a policy mechanism inherently are unjust as the community continues to bear the burden of a toxic/emissions, which is specific in its impact to that place and people. Broader community benefit actions should not be in place of direct onsite emissions reductions. The concept of offsets has a long literature within the EJ community of being entirely unacceptable as an applied policy mechanism for pollution reduction, as they are clearly structured to benefit the polluter and their need for "flexibility" and "low cost".

Additionally, job creation and economic impact should not be considered a community benefit as part of the CI permitting process. There should be no line drawn stating what amount of impact to community members' health is worth the exchange for potential economic security. No one is qualified to make that decision on anyone else's behalf. No community members' health should be at the expense of and used in exchange for capital of any form. Additionally, there is no real mechanism to require a company to hire local residents. Even if companies commit to hiring locally, they cannot require employees to stay local and not move out of the area.

Environmental justice areas. Using an error margin to conservatively assume a greater number of environmental justice areas is appropriate and necessary. CMEJ is in full support of adding the margin of error to census and survey data as concern and focus should be on eliminating negative impacts on peoples' health. Pollution moves and is not restricted by census boundaries. Unless modeling and monitoring systems can show that the impacts from a facility do not contribute to negative health outcomes of people of color, low-income people, and people with limited English proficiency, then MPCA should assume a greater number of environmental justice areas. Not being directly counted in the census should not also count against communities when it comes to addressing disproportionate impacts. This does not "dilute" efforts or divert resources from areas if state programs are adequately funded and staffed to support this work appropriately.

Support for the necessary work. MPCA and the State of Minnesota should adequately fund and staff this work appropriately. This will take a lot of effort to include community in these processes, to complete and review analyses, and to implement the final outcome. Without proper funding and staff levels, the benefits of this work will be delayed for communities who have already been waiting.

Sincerely,
Shalini Gupta and Roxxanne O'Brien
on behalf of
Community Members for Environmental Justice (CMEJ)

RECEIVED
By: OAH on 10/6/2023 at 9:58am
Jonathan Cox Attachment

October 6, 2023

Subject: Comments to Planned New Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas, Minnesota Rules, chapter 7001; Revisor's ID Number R-04805

Facility: 200 E Carterett St,
Duluth, MN 55808

ME Global is thankful for the opportunity to comment. ME Global is ISO 14001 certified and is committed to minimize environmental impacts of our facility operations. Our environmental policy reflects our commitment to; be an environmentally responsible neighbor, pollution prevention, compliance to all EHS regulations, and continual improvement of our environmental management system. Individuals, working on or for our behalf, are required to comply with these commitments. Below are ME Global's comments.

ME Global respectfully requests and expects that the statute is followed, and the included guidelines are respected.

1) **Establish benchmarks to assist the Commissioner's determination regarding the need for a cumulative impacts analysis.**

ME Global's comment is to consider a benchmark criterion that would omit a cumulative impact analysis if any of the following were true:

- A proposed air permit modification for an existing permit will result in an emission reduction.
- A proposed air permit modification for an existing permit will improve environmental control.
- A proposed air permit modification for an existing permit will not result in an exceedance to the limits contained in the current air permit.
- A proposed air permit modification is pollutant specific and that pollutant is not of concern in that given EJ area.

Accurate baseline levels of pollution in impacted areas must be established and made public by MPCA.

2) **Establish the required content of a cumulative impacts analysis and provide sources of public information that an applicant can access regarding environmental stressors present in an EJ area.**

- Publicly available data showing direct relationships between the environmental stressors and the adverse effect they are causing in the EJ zone must be clear and objective.
- Ensure environmental stressors include Chapter 60, Article 8, Section 3, Paragraph f, 1 and 2, so that socioeconomic factors are part of the impact analysis.

3) **Define conditions, criteria, or circumstances that establish an environmental or health impact as a substantial adverse impact.**

- Based upon a data driven relationship between environmental stressors and the adverse effect they are causing in the EJ zone a "substantial" adverse impact should be well supported and

external influences to this data should be considered. An example of an external influence would be forest fire pollution. "Substantial" should be something easily agreed upon by all parties.

4) **Establish the content of a community benefit agreement and procedures for entering into community benefit agreements, which must include: i) active outreach to residents of the affected EJ area designed to achieve significant community participation; ii) considerations other than or in addition to economic considerations, but with priority given to considerations that directly impact the residents of the EJ area; and iii) at least one public meeting held within the affected EJ area.**

- ME Global welcomes outreach and public activities that demonstrate our commitment to being a good neighbor.

5) **Establish a petition process and form to be submitted to the Agency by EJ area residents to support the need for a cumulative impact analysis.**

- ME Global supports any data driven evidence of an adverse cumulative impact which is relatable to the permit in question.

6) **Establish a process through consultation as defined in MN Statute 10.65 by which a Tribal government can elect to apply this section to a permit application.**

ME Global has full confidence that the MPCA will establish a process through consultation as defined in MN Statute 10.65 by which a Tribal government can elect to apply this section to a permit application.

7) **Establish methods for holding public meetings and handling public comments.**

- ME Global supports well-defined rules and processes for holding public meetings and handling public comments. A mediation process would be beneficial in ensuring meetings adhere to the topics and that those most impacted are heard.

Sincerely,

Jonathan D. Cox
Senior Environmental Engineer
ME Global Inc.
5857 S. Kyrene Rd.
Tempe, AZ 85283

RECEIVED
By: OAH on 10/6/2023 at 10:30am
John Howard Attachment

Re: Comments on Planned New Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas, Minnesota Rules, chapter 7001; Revisor's ID Number R04805

The Citizens Environmental Quality Committee of the City of Winona, Minnesota, appreciates the opportunity to comment on the proposed Cumulative Impacts Rule, and wishes to comment specifically on the lack of representation for rural and Greater Minnesota in the Cumulative Impacts Rule. Approximately half of the state's population lives outside the cities and metro area defined in the Rule. As indicated by the MPCA's own map, "Understanding environmental justice in Minnesota," many communities in Greater Minnesota (including Winona) also have populations in which 35% live beneath 200% of the poverty line, and are adversely affected by air pollution from manufacturing, power generation, and/or industrial agricultural operations. Our committee requests that Environmental Justice Areas in Greater Minnesota be included in the Cumulative Impacts Rule, out of concern that such areas also can be disproportionately affected by air pollution. We are concerned that establishing rules only applicable to the communities of Duluth, Rochester, and the Twin Cities Metro Area creates incentives to push the highest-emitting industrial activity to rural and Greater Minnesota areas, promoting a "race-to-the-bottom" effect in pollution control. We encourage the development of rules that can be uniformly applied in Environmental Justice Areas throughout the state of Minnesota.

Any reply or communications regarding this comment letter can be addressed to the Citizens Environmental Quality Committee's staff liaison, John Howard: Jhoward@ci.winona.mn.us

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By: OAH on 10/6/2023 at 11:37am
Melissa Weglarz Attachment

minnesota power
AN ALLETE COMPANY

ELECTRONIC CORRESPONDENCE ONLY

October 6, 2023

Administrative Law Judge Kimberly Middendorf
Minnesota Office of Administrative Hearings

Kate Izzo
Minnesota Pollution Control Agency

Comments submitted electronically through OAH website https://minnesotaoah.granicusideas.com/

Re: Request for Comments on Planned New Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas, Minnesota Rules, Chapter 7001
Revisor's ID Number R-04805; OAH Docket No. 21-9003-39398

Dear Judge Middendorf and Ms. Izzo:

Minnesota Power ("MP", "the Company"), a division of ALLETE, submits these comments in response to the *Request for Comments (RFC) on Planned New Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Area*s issued by the Minnesota Pollution Control Agency (MPCA) on July 24, 2023. While draft rules have not yet been crafted, the MPCA's request for comments (RFC) noticed its intent to begin cumulative impact (CI) rulemaking relative to environmental justice (EJ) areas, as recently defined for the first time in Minnesota law by the 2023 Legislature.

MP is an electric utility company based in Duluth and providing electricity in a 26,000 square-mile service area in central and northeastern Minnesota. MP serves approximately 145,000 residential and commercial customers, fifteen municipalities, and some of the nation's largest industrial customers. MP's generating fleet is a diversified mix of resources, including coal, biomass, hydropower, wind, and solar. In 2020, MP became the first utility in Minnesota to deliver 50% renewable energy to its retail and municipal customers. The Company is now working toward goals of reducing carbon emissions by 80% by 2035 and achieving more than 70% renewable energy in 2030. On February 7, 2023, the Minnesota Governor signed into law legislation that updates the state's renewable energy standard and requires Minnesota electric utilities to source retail sales with 100 percent carbon-free energy by 2040.

MP is supplying these comments on the MPCA's proposed CI rulemaking in consideration of our existing and proposed resource mix, our planning efforts to protect customer costs and support reliability needs, and our long commitment to environmentally compliant, responsible operations in Minnesota.

Applicability

On September 8, 2023, the MPCA released a preliminary list of 123 facilities likely to be impacted by this new CI law, by virtue of their (1) being located inside or within 1 mile of the newly defined environmental justice areas of the Twin Cities seven-county metro area or the cities of Duluth and

Rochester, and (2) requiring a major source or state air permit to operate. MP's Hibbard Renewable Energy Center (Hibbard) in Duluth was listed along with seven other facilities in the City of Duluth.
In its July 24, 2023 RFC, the MPCA listed several specific CI rulemaking objectives for comment. At this pre-rulemaking stage, MP is submitting comments on items 1, 2, and 3:

1. Establish benchmarks to assist the Commissioner's determination regarding the need for a cumulative impacts analysis
2. Establish the required content of a cumulative impacts analysis and provide sources of public information that an applicant can access regarding environmental stressors present in an EJ area.
3. Define conditions, criteria, or circumstances that establish an environmental or health impact as a substantial adverse impact.

These items are critical components of CI rulemaking and are needed to establish which areas are deemed EJ areas of concern, what types of permit actions trigger a CI analysis, and how an analysis will be conducted and deemed complete. The other RFC comment topics (community benefit agreements, the petition process, tribal consultation, and methods for public meetings/public comments) will also require refinements during the next several years of work on this rulemaking; however, MP is not submitting comments on these areas at this time.

1. Establish benchmarks to assist the Commissioner's determination regarding the need for a cumulative impacts analysis *(What criteria or benchmarks should be used when the MPCA decides whether to require a cumulative impacts analysis?)*

Subd. 1 (h)) and Subd. 2 state that cumulative impacts analysis is relevant to only specific types of permits (major source air permit or a state air permit), for new construction, facility expansion, or reissuance of an existing permit. However, Section 3 of Article 8 of HF 2310 (Subd. 1(c)) is much broader and not as well defined; categorizing cumulative impacts as the "impacts of aggregated levels of past and current air, water, and land pollution in a defined geographic area to which current residents are exposed".

A cumulative impact analysis should be deemed required for those facilities that meet all the required geographic (located in an EJ area or concern) and air permitting criteria outlined in the existing law under Subd. 1 (h)) and Subd. 2. For proposed permitting actions that quality as potentially triggering a CI analysis, clearly defining the criteria or benchmarks that would require a CI review will be critical. This includes both the geographical determination of the EJ area of concern and the numerical or categorical triggers of the project and/or permit action itself. It is important that the MPCA CI rulemaking avoid applicability scope creep by adhering to the parameters of the existing directives as written and defined by the 2023 CI legislation.

In establishing benchmarks to require a CI analysis, the MPCA could first consider categorical carve-outs to better focus attention and resources on more important, impactful projects and facilities. For

example, a CI analysis could be deemed unnecessary for certain pollutants of lowest concern, or in areas where ambient air monitoring already present indicates air pollution at adequately protective low levels.

Definition of EJ Area

Within its online EJ mapping tool[1], the MPCA states that the margin of error is included in the determination of EJ areas. From the site's "Environmental Justice – Overview of areas of concern" tab:

> Please note that margin of error is accounted for in determining environmental justice areas of concern. For example, if a census tract has an estimated population of 36% people of color with a 5% margin of error, then we would count that census tract as an environmental justice area of concern.

The practice of including a margin of error does not appear to comport with the plain legal definition of an EJ area under Minn. 116.05 Subd. 1(e), which contains no reference to statistical errors:

> (e) "Environmental justice area" means one or more census tracts in Minnesota:
> (i) in which, based on the most recent data published by the United States Census Bureau:
> (A) 40 percent or more of the population is nonwhite;
> (B) 35 percent or more of the households have an income at or below 200 percent of the federal poverty level; or
> (C) 40 percent or more of the population over the age of five has limited English proficiency; or
> (ii) located within Indian Country, as defined in United States Code, title 18, section 1151;

MPCA should rely on the plain language of Minn. 116.05 Subd. 1(e). For example, the Park Point area in Duluth, Census tract #27137002200, is listed as having a poverty level rating at 20.60% +/- 25.32% -- a potential margin of error > 100%. At minimum, MPCA should have standards in place to exclude margins of error in the analysis if more than a certain percentage (e.g., margin of error greater than 5%).

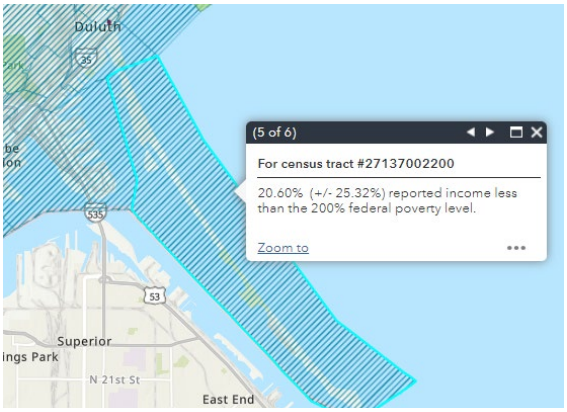

Figure 1: Graphic from MPCA's Online EJ Mapping Tool

[1] https://mpca.maps.arcgis.com/apps/MapSeries/index.html?appid=f5bf57c8dac24404b7f8ef1717f57d00

Criteria or Benchmarks to Require a CI Analysis

A myriad of existing air quality regulations and programs already quantify and address the topic of historical and current ambient concentrations of air pollution; for example, the National Ambient Air Quality Standards "NAAQS" mandates an extensive statewide ambient air quality monitor network. The Clean Air Act's Prevention of Significant Deterioration regulations provide for allowable incremental changes under certain conditions and requirements. MPCA should use existing state and federal air quality regulations and programs such as these as a starting point for CI benchmarks and criteria.

The CI rulemaking should also allow different treatment of *existing* sources versus *new* sources. This is consistent with existing air quality regulations and permits (e.g., the New Source Performance Standards set for new emissions units, which are distinct from emissions guidelines at existing sources.) Existing and new sources (and permits) can be quite different, and the current state and federal framework recognizes the importance of allowing facilities to continue to operate, modernize, expand, and change as needed, and also to not prevent the economic and social benefits associated with the construction of new facilities. In most cases, existing facilities will have actual available data that can be used to better understand potential changes of a permit amendment or impacts of a permit reissuance; for new facilities, an extensive ambient monitoring network for priority pollutants already exists that can be used to establish air quality baselines for screening purposes.

2. Establish the required content of a cumulative impacts analysis and provide sources of public information that an applicant can access regarding environmental stressors present in an EJ area.

The CI rules must provide adequate clarity to the regulated community on what information a permittee:

1) Is responsible for securing themselves, to what extent,

2) When/how the background research can be deemed to be adequate and fully completed to satisfy the CI analysis obligations.

The rulemaking should delineate whether the entire responsibility to produce the information falls entirely on the applicant, or is a shared burden, as it much of the information will likely consist of references to official, publicly sanctioned medical studies, released governmental census results, etc., as prescribed under the Section 3, Subd. (1) definition of "environmental stressors":

> (f) "Environmental stressors" means factors that may make residents of an environmental justice area susceptible to harm from exposure to pollutants. Environmental stressors include:
>
> (1) environmental effects on health from exposure to past and current pollutants in the environmental justice area, including any biomonitoring data from residents reported through

the Centers for Disease Control, the Department of Health, or peer-reviewed scientific or medical articles; and

(2) social and environmental factors, including but not limited to poverty, substandard housing, food insecurity, elevated rates of disease, and poor access to health insurance and medical care.

3. **Define conditions, criteria, or circumstances that establish an environmental or health impact as a substantial adverse impact** *(what defines a substantial adverse health and environmental impact and how is it measured or assessed?)*

As noted earlier, numerous air quality regulations already exist to assess and mitigate air pollution risks associated with new or modified/expanded major or state air permit sources. To provide commensurate value for the cost and burden that cumulative impacts analysis and denotation will require, the permit activity triggering "substantial adverse impact" must be of a significant nature, for instance only major air permit amendments, not minor or moderate amendments. Likewise, a standard facility reissuance with no projected significant changes or increased impacts should not require a full relook because that facility has long been operating in, and is already part of the ambient baseline of, the area.

Additionally, the "substantial adverse impact" must be narrowly specific to the facility onsite (not upstream/downstream or offsite) impacts, and further, be correlated exactly to those additions or changes being allowed by a new or amended permit. A *de minimis* change to an existing facility's permit or operations should not qualify as a "*substantial* adverse impact", regardless of the existing background conditions already present in the specific area. Insignificant and minor changes such as this will already be properly and adequately captured by existing regulatory processes and would not meet the commonplace (Miriam-Webster) definition of "substantial": *considerable in quantity; significantly great.*

Without clear guardrails, thresholds, and standards, open-ended optional CI analysis clauses will provide no certainty to the regulated community. Project proposers and facility operators need to have a clear idea of the expected requirements, costs, and timelines for cumulative impacts analysis obligations. As per Section 3, Subd. (2), the environmental stressors evaluated must also consider socio-economic implications.

Conclusion

Minnesota Power appreciates the MPCA's consideration of this submittal and our ability to comment on this proposed future Cumulative Impacts rulemaking. As a responsible corporate citizen long invested in environmental improvements and compliance, MP is fully committed to supporting the well-being of the Northeastern Minnesota communities our Company has called home for over a century. For questions

or additional detail, please contact Melissa Weglarz, Minnesota Power Environmental Audit & Policy Manager, at mweglarz@mnpower.com or 218-355-3321.

Sincerely,

Kurt Anderson
Director, Environmental & Land Management
ALLETE/Minnesota Power
30 West Superior Street, Duluth, MN 55802

RECEIVED
By: OAH on 10/6/2023 at 11:55am
Kathleen Schuler Attachment

Office of Administrative Hearings
Attn: Kimberly Middendorf
600 North Robert St
PO Box 64620
Sr. Paul, MN 55164-0620

October 5, 2023

RE: Minnesota Pollution Control Agency Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas, *Minnesota Rules*, chapter 7001; Revisor's ID Number R04805

Dear Judge Middendorf:

We are Minnesota health care, health professional and public health organizations concerned about protecting and improving human health and reducing health disparities in our state. We appreciate the opportunity to express our support for the cumulative impacts law and to comment on the rulemaking process for its implementation. The cumulative impacts law passed in 2023 promises to take an important step in dismantling existing environmental racism. Environmental racism has resulted in the disproportionate and unjust placement of highways and polluting industries in neighborhoods and communities with higher proportions of Black, Indigenous and People of Color (BIPOC), people experiencing poverty, or people with limited English-language proficiency, who are defined as environmental justice communities for purposes of this new law.

Environmental justice communities in Minnesota are burdened by higher levels of pollution from traffic and industrial sources. In addition, compared with statewide averages, environmental justice communities are more likely to experience higher rates of unemployment, poverty, arrests, and incarceration while also facing systematic barriers to homeownership, generational wealth, educational attainment, livable wages, and healthy food access. These underlying socioeconomic disparities and higher pollution exposure result in health disparities, including shorter lifespan, higher rates of infant and maternal mortality, and higher incidence of heart disease, cancer, asthma and diabetes. For example, Black and American Indian infants are twice as likely to die before their first birthdays as white infants in Minnesota. Affected communities include urban, suburban, rural, and tribal areas.

We appreciate the opportunity to express our support for the cumulative impacts policy and comment on the rulemaking process for its implementation. The cumulative impacts rule must effectively protect the people and environment, especially in areas and communities that it has historically failed. The rule must center anti-racism and environmental justice to reach lower pollution

levels for impacted communities. **This means that the MPCA — together with community members — must collaboratively and transparently create these rules.**

The intent of the cumulative impacts law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must:

- Ensure that cumulative impacts analyses are made easily accessible and understandable for community members.
- Create a process for impacted areas to approve or deny a community benefit agreement.
- Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made.

This rule must both reduce existing pollution and prevent new pollution in environmental justice areas, which will only be achieved through accountability, transparency and listening to the voices and expertise of impacted communities. The rule must embody the intent of the legislation, which is to improve the health and quality of life in environmental justice communities. As health care and public health professionals who understand the direct health impacts of environmental racism, we look forward to reviewing the draft rules, when they are published, and we will closely follow the process going forward.

Thank you for the opportunity to comment on the cumulative impacts rule.

Sincerely,

Brenna Doheny, PhD, MPH - Executive Director, Health Professionals for a Healthy Climate

Kent Boyd, RN, PHN - Health Students for a Healthy Climate

Bob Jeske, MD - President, Minnesota Academy of Family Physicians

Cuong Pham, MD – President, Minnesota Doctors for Health Equity

Mary C. Turner, RN - President, Minnesota Nurses Association

Merry Grande, MPH - Executive Director, Minnesota Public Health Association

Citation: Climate Justice and Public Health in Minnesota: Equitable Solutions to the Climate Crisis, July 2022. https://hpforhc.org/our-work/

RECEIVED
By: OAH on 10/6/2023 at 12:26pm
Janiece Watts Attachment

Comment Submission for MPCA's Cumulative Impacts Rulemaking

The following comments are submitted by Fresh Energy on behalf of Minnesotans.

October 6, 2023

Fresh Energy

408 Saint Peter Street, Suite 350, Saint Paul, MN 55102
www.fresh-energy.org

Loni Kemp
Canton, MN

Comment on MPCA's Cumulative Impacts Rulemaking

I am very pleased to see the Minnesota Pollution Control Agency (MPCA) considering cumulative impacts as part of the air permitting process for proposed projects in specific environmental justice communities. I appreciate that the MPCA will account for the existing pollution that communities face when proposing a new industrial facility.

As a former member of the Minnesota Pollution Control Agency Citizens Board, I think it is important that MPCA always promote openness to public input on environmental issues. Nothing has yet replaced the Citizens Board which was discontinued some years ago with little input, by the Legislature.

I urge the MPCA to create a transparent and accessible process for public engagement opportunities that will reduce barriers for communities that are already overburdened by pollution, including historically marginalized communities and under-resourced individuals and groups.

Specifically, I encourage the MPCA's community engagement meetings to be broadly accessible, with options for in-person and virtual meetings, as well as childcare, food, and transportation. The meetings need to be respectful of people's time and expertise that is offered, and they must be transparent in how comments will be utilized with a responsive feedback loop throughout the rulemaking process. MPCA should also provide online resources to inform and educate community members about how to be part of the process.

Being as transparent, proactive, and accommodating as possible will ensure the community engagement process is effective and equitable. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions in their communities.

Thank you for your time.

Linnea Swenson Tellekson
Minneapolis, MN

Comment on MPCA's Cumulative Impacts Rulemaking

I am very pleased to see the Minnesota Pollution Control Agency (MPCA) considering cumulative impacts as part of the air permitting process for proposed projects in specific environmental justice communities. I appreciate that the MPCA will account for the existing pollution that communities face when proposing a new industrial facility.

My name is Linnea Swenson Tellekson from Duluth and Minneapolis. I think it is important we have a clear process for public engagement beyond what currently exists. I urge the MPCA to create a transparent and accessible process for public engagement opportunities that will reduce barriers for communities that are already overburdened by pollution, including historically marginalized communities and under-resourced individuals and groups.

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Thank you for your time.

Matthew Davis
Detroit Lakes, MN

Comment on MPCA's Cumulative Impacts Rulemaking

I am very pleased to see the Minnesota Pollution Control Agency (MPCA) considering cumulative impacts as part of the air permitting process for proposed projects in specific environmental justice communities. I appreciate that the MPCA will account for the existing pollution that communities face when proposing a new industrial facility.

My name is Matthew Davis from Detroit Lakes. I think it is important we have a clear process for public engagement beyond what currently exists. I urge the MPCA to create a transparent and accessible process for public engagement opportunities that will reduce barriers for communities that are already overburdened by pollution, including historically marginalized communities and under-resourced individuals and groups.

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Thank you for your time.

K. Feilmeyer
Saint Paul, MN

Comment on MPCA's Cumulative Impacts Rulemaking

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My name is Kimberly from Saint Paul. I think it is important we have a clear process for public engagement beyond what currently exists. I encourage the MPCA to create a transparent and accessible process for public engagement opportunities that will reduce barriers for communities that are already overburdened by pollution, including historically marginalized communities and under-resourced individuals and groups.

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Thank you for your time.

Juliann Rule
Avon, MN

Comment on MPCA's Cumulative Impacts Rulemaking

I am very pleased to see the Minnesota Pollution Control Agency (MPCA) considering cumulative impacts as part of the air permitting process for proposed projects in specific environmental justice communities. I appreciate that the MPCA will account for the existing pollution that communities face when proposing a new industrial facility.

I am writing because I think it is important we have a clear process for public engagement beyond what currently exists. I urge the MPCA to create a transparent and accessible process for public engagement opportunities that will reduce barriers for communities that are already overburdened by pollution, including historically marginalized communities and under-resourced individuals and groups.

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Thank you for your time.

Rachel Wormer
Minneapolis, MN

Comment on MPCA's Cumulative Impacts Rulemaking

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Thank you for your time.

Paul Moss
White Bear Lake, MN

Comment on MPCA's Cumulative Impacts Rulemaking

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Thank you for your time.

Barbara Kaufman
Pine River, MN

Comment on MPCA's Cumulative Impacts Rulemaking

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As a member of a small, rural community, I see the importance of also making in person meetings more accessible to people in locations such as mine. One way to do this would be to schedule some meetings in smaller cities that may be closer to underserved rural areas.

Being as transparent, proactive, and accommodating as possible will ensure the community engagement process is effective and equitable. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions in their communities.

Thank you for your time.

Richard Meierotto
Afton, MN

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Thank you for your time.

Dave Councilman
Minneapolis, MN

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Thank you for your time.

Isak Kvam
Zimmerman, MN

Comment on MPCA's Cumulative Impacts Rulemaking

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Thank you for your time.

Kay Slama
Spicer, MN

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Thank you for your time.

Laurie Windisch
Stillwater, MN

Comment on MPCA's Cumulative Impacts Rulemaking

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My name is Laurie Windisch from Stillwater. I think it is important we have a clear process for public engagement beyond what currently exists. I urge the MPCA to create a transparent and accessible process for public engagement opportunities that will reduce barriers for communities that are already overburdened by pollution, including historically marginalized communities and under-resourced individuals and groups.

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Thank you for your time.

Susan Hellstrom
Minneapolis, MN

Comment on MPCA's Cumulative Impacts Rulemaking

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My name is Susan from Minneapolis. I think it is important we have a clear process for public engagement beyond what currently exists. I urge the MPCA to create a transparent and accessible process for public engagement opportunities that will reduce barriers for communities that are already overburdened by pollution, including historically marginalized communities and under-resourced individuals and groups.

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Thank you for your time.

Janiece Watts
Saint Paul, MN

Comment on MPCA's Cumulative Impacts Rulemaking

I am very pleased to see the Minnesota Pollution Control Agency (MPCA) considering cumulative impacts as part of the air permitting process for proposed projects in specific environmental justice communities. I appreciate that the MPCA will account for the existing pollution that communities face when proposing a new industrial facility.

My name is Janiece Watts from St. Paul. I think it is important we have a clear process for public engagement beyond what currently exists. I urge the MPCA to create a transparent and accessible process for public engagement opportunities that will reduce barriers for communities that are already overburdened by pollution, including historically marginalized communities and under-resourced individuals and groups.

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The Frontline Communities Protection Act was meant to be a tool in addressing environmental racism and injustice of the burden and harmful effects of pollution on under-resourced communities of color. This is about shifting the decision making power and process to include community input. It is important that the design and structure for conducting the cumulative impact analysis be reflective of the core intention of the FCPA.

Being as transparent, proactive, and accommodating as possible will ensure the community engagement process is effective and equitable. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions in their communities.

Thank you for your time.

RECEIVED
By: OAH on 10/6/2023 at 12:41pm
Alex Olin Attachment

CEMSTONE®

October 6, 2023

Katie Izzo
Rule Coordinator
Minnesota Pollution Control Agency
520 Lafayette Road North, St. Paul, MN 55155-4194

SUBMITTED ELECTRONICALLY

Dear Ms. Izzo,

Thank you for allowing us the opportunity to comment on the "Planned New Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas, Minnesota Rules, chapter 7001" ("New Cumulative Impacts Rule"). Cemstone Products Company ("Cemstone") is a Minnesota-based 4th generation, family-owned company that has been doing business in Minnesota since 1927. We operate over 80 facilities in the state that are involved in aggregate mining, ready-mix concrete production, and other concrete and construction-based operations. We have multiple facilities in the seven-county metropolitan area that could potentially be affected by the New Cumulative Impacts Rule.

As the MPCA determines the best way to incorporate the New Cumulative Impacts Rule, we ask that the MPCA considers the critical role that the construction industry, and specifically ready-mix concrete plants, have and will continue to have in the construction and maintenance of our state's infrastructure. Through the passage of recent legislation, there is going to be, as noted by the Biden-Harris Administration, "billions of tons of concrete" will be needed to build, maintain, and operate our country's buildings and infrastructure. This comes from the Administration's announcement of a $100 million grant program to support clean construction materials to combat greenhouse gas (GHG) emissions.

The 2023 Minnesota State Legislature also emphasized clean construction materials by adopting new Minnesota Statutes Chapter 16B. Cemstone asks that the MPCA take into consideration these important federal and state goals before taking actions that have the real potential to drive aggregate production and ready-mix concrete production out of the seven-county metro area. This would result in increased GHG emissions and increased costs of critical construction materials.

Aggregate resources are in limited, fixed locations. Locating aggregate sources close to where they are used is critical, and it is becoming more difficult in the seven-county metro. The MPCA must avoid any actions that would exacerbate that problem and unintentionally interfere with aggregate production. In addition to that, we ask that the MPCA value production of ready-mix products close to the location of their use because ready-mix products are perishable and must

be used within one hour of initiating the concrete mix. Any policy that could potentially drive those aggregate and ready-mix facilities further from their end use would be contrary to federal and state carbon reduction goals laid out above and would have an adverse impact on the perishable product.

Cemstone would also like to express our concern about the impact this would have on permitting timelines. The amount of time it takes from application to issuance of permits is already becoming problematic in some instances, and adding additional requirements and review time is only going to lengthen the time it will take to issue, update, or modify a permit. As the MPCA is determining how to implement the New Cumulative Impacts Rule, we ask that you also consider ways to streamline the process to reduce the time from application to issuance.

Thank you for your consideration of our comments as you define the scope of the New Cumulative Impacts Rule. Cemstone looks forward to continuing to work with the MPCA and others through this rulemaking process.

Sincerely,

Alex Olin, PE
Environmental, Facilities and Engineering Manager
aolin@cemstone.com
651-286-1307

RECEIVED
By: OAH on 10/6/2023 at 1:08pm
Jeff Stollenwerk Attachment

Duluth Seaway Port Authority

802 Garfield Avenue
Duluth, Minnesota 55802-2640 U.S.A.
218-727-8525 ■ Fax 218-727-6888
E-Mail: admin@duluthport.com ■ www.duluthport.com

October 6, 2023

William Moore
Office of Administrative Hearings
600 North Robert Street
PO Box 64620
St. Paul, MN 55164

Re: Planned New Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas, Minnesota Rules, Chapter 7001; Revisor's ID Number R04805

Dear Mr. Moore,

The Duluth Seaway Port Authority (DSPA) is an independent public agency created by the Minnesota State Legislature to foster regional maritime commerce, promote trade development, facilitate industrial development and serve as an advocate for port interests. Approximately 800 vessels and 35 million tons of cargo move through the Port of Duluth-Superior each year, making it the Great Lakes' largest tonnage port and one of the nation's top 20. The Port supports over 7,000 jobs and contributes $1.3 billion in business revenue to the regional economy. The DSPA's mission is to bring business to the port, economic development to the region, and advocate for maritime transportation, freight, and industry. Our vision is a healthy regional economy supported by a vibrant industrial port.

The Minnesota Pollution Control Agency (MPCA) has initiated the rulemaking process needed to enact the cumulative impacts analysis requirements as directed by Minnesota Session Law 2023, chapter 60, article 8, section 3, which requires amendments to air quality permitting rules. The law defines environmental justice (EJ) areas and requires the MPCA to conduct a rulemaking process to address the cumulative impacts of pollution during air quality permitting processes. The MPCA's initial request for comments is a call for feedback on the following topics:

- What specific criteria should be considered for requiring a cumulative impacts analysis?
- What health risks or concerns should be considered?
- What should be included in a community benefit agreement?
- Should a community benefit agreement have a public comment process?

The DSPA routinely works with industries that are interested in locating or expanding in the Duluth area. Duluth's industrial sector drives significant economic growth and stability in the region. On a per-job basis, the industrial sector generates three times more tax revenue and supports twice as many additional jobs compared to the rest of Duluth's economy. The average industrial wage in Duluth is $68,913, compared to $48,401 for the average non-industrial job in Duluth. These jobs also come with competitive benefits and opportunities for career advancement while being accessible across multiple education levels.[1] Access to industrial jobs can help reduce poverty in EJ areas and provide the resources people need to raise a healthy family.

The time required and uncertainty of environmental permitting and administrative processes is routinely cited as a concern of industries that are interested in locating or expanding in Minnesota. A potential unintended consequence of Minnesota's new cumulative impacts law is that it will increase the time required and uncertainty of environmental permitting in EJ areas that have the greatest need of accessible good-paying jobs with health care and retirement benefits.

[1] Northspan 2019 update of "Foundations for Growth - Industrial Study. https://duluthport.com/community/economic-impact/

The MPCA's rulemaking should seek to identify and protect EJ areas that are experiencing pollution burdens, and implement cumulative impacts analysis requirements in a way that reduces the permit process timeframe and increases the certainty of the permitting process. From this perspective, the DSPA offers the following initial comments regarding the Planned New Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas:

1) What specific criteria should be considered for requiring a cumulative impacts analysis?

The law is limited to MPCA's issuance of a major source air permit, as defined in Minnesota Rules, part 7007.0200, or a state air permit required under Minnesota Rules, part 7007.0250, subpart 5 or 6. This includes a permit required for new construction or facility expansion or the reissuance of an existing permit. This limitation established in the law should be the first level screening criterion. Any permitting or authorization processes outside the strict interpretation of the "Permit" definition in the law should not be required to engage in a cumulative impacts analysis.

Additional screening criteria should include:

- The MPCA should determine whether the subject facility is actually in or within one mile of an environmental justice area. MPCA's EJ mapping tool identifies EJ areas and their associated data. The margin of error in the data that determines EJ areas is very high due to weak census data. This expands the EJ areas much larger and into areas that are unlikely to meet the EJ area criteria established in law. If the MPCA cannot definitively determine that a facility is actually in or within one mile of an EJ area, it should not require a permit applicant to engage in a cumulative impacts analysis.
- The MPCA should determine whether issuance of a permit to the subject facility would result in substantial incremental increase in local air pollution. If the MPCA cannot definitively determine that an air quality permit issuance for a facility in or within one mile of an EJ area would cause a substantial incremental increase in local air pollution, it should not require a permit applicant to engage in a cumulative impacts analysis.

2) What health risks or concerns should be considered?

Health risks or concerns should be evaluated only after the MPCA has determined a) a proposed permit action is subject to the cumulative impacts law, b) the subject facility of the proposed permit action is definitively in or within one mile of an EJ area, and c) the proposed permit action will cause a substantial incremental increase in local air pollution. In cases where the MPCA has made these determinations, it should consider documented and verified health risks or concerns. The law directs MPCA to consider information reported through the Centers for Disease Control, the Department of Health, or peer-reviewed scientific or medical articles. The MPCA should consider only professionally-documented and scientifically-verified health risks.

3) What should be included in a community benefit agreement?

The MPCA will be challenged to decide who represents the community (elected officials, community organizations, etc.). While the CI process should include all interested parties, the parties to a community benefit agreement (CBA) should be limited to the permittee and MPCA to avoid confusion and uncertainty. The CBA terms and conditions should be limited to direct mitigation of the documented disproportionate exposure of EJ communities to pollution.

4) Should a community benefit agreement have a public comment process?

The CBAs should be developed through a transparent process that encourages public participation and supports robust community engagement. The process can be robust without a separate formal public comment process. The CBAs could be subject to public comments during the public comment period for the proposed air quality permit. A separate public comment period for the community benefit agreement would be redundant and wasteful.

Increased stakeholder engagement is critical to ensuring the cumulative impacts law has a positive impact on EJ communities. Unfortunately, the law was developed without input from the industries it proposes to regulate. Through the rulemaking process, the MPCA should develop a specific strategy to rectify this significant error. The rulemaking process should actively pursue participation of industries, economic development entities, and business organizations across the state.

The list of facilities that may be affected by Minnesota's new cumulative impacts law posted on the MPCA's CI web page is problematic. While the MPCA's effort to identify and contact specific facilities potentially impacted by the CI law is appreciated, the list is most certainly inaccurate due to inadequate data, information and criteria. The list will also cause some people to falsely expect that all of the listed facilities must complete a CI analysis and CBA during permitting processes. The MPCA is encouraged to continue efforts to identify and contact specific entities potentially impacted by the CI law, but such lists should not be posted on the MPCA's CI web page.

In summary, the DSPA supports the identification, mitigation and protections extended to communities disproportionately impacted by past and current sources of pollution. The state should work to ensure that the legislation designed to help EJ areas doesn't unintentionally harm the people it is intended to help, and should work to ensure that real environmental benefit is realized through the process. The Planned New Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas should focus on implementing the law as written and in a manner that increases certainty in the permitting and administrative processes.

Sincerely,

Deborah B. DeLuca
Executive Director

Danny Ackert Attachment
RECEIVED
By: OAH on 10/6/2023 at 1:13pm

Minnesota Hospital Association
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Office of Administrative Hearings
Attn: William Moore
600 North Robert Street
P.O. Box 64620
St. Paul, MN 55164

October 6, 2023

Re: Planned New Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas, Minnesota Rules, Chapter 7001; Revisor's ID Number R04805

Dear Mr. Moore,

On behalf of the Minnesota Hospital Association (MHA), please accept the following comments as the Minnesota Pollution Control Agency (MPCA) begins to develop rules governing the new cumulative impacts analysis process for permit decisions in environmental justice areas. MHA represents Minnesota's hospitals and health systems, which employ more than 127,000 people, provide high-quality care for patients, and meet the needs of communities statewide. Since 1917, MHA has worked to provide Minnesota's hospitals and health systems with the resources, best practices, and guidance to provide an exceptional patient experience and high-quality, affordable care that extends well beyond the hospital.

Overview

Hospitals in or near the newly identified environmental justice areas in the Seven-County Metro, Rochester, and Duluth provide critical services that require 24/7 electricity to sustain care and patient wellbeing in operating rooms and critical care units where even a momentary interruption in power could mean life or death for a patient. Hospitals also rely on electricity for many critical operations indirectly related to delivering patient care, including lighting, security systems, fire alarm and egress systems, environmental controls (e.g., air conditioning), electronic health records, and an array of electricity-dependent durable medical equipment and devices.

Given this incredible responsibility to their patients and communities, hospitals are required by federal law and regulation[1] to have contingency plans to sustain operations during a power outage. Such requirements include the availability of multiple secondary power sources, such as generators and subsequent backup generators. Therefore, having secondary power sources requires hospitals to acquire air permits with MPCA to use the generators in the event of a power outage and to generate air pollution while sustaining their critical services.

It is with this understanding that MHA urges MPCA to provide ample and consistent consideration in the cumulative impact rulemaking process to account for the unique position that hospitals hold in the air permitting process as it relates to their requirements to ensure maximal patient and community safety.

Responses to specific MPCA Questions

1) Establish benchmarks to assist the Commissioner's determination regarding the need for a cumulative impacts analysis.

   In Section 3 of Article 8 of HF 2310 (Subd. 1 (c)), the Minnesota Legislature defines cumulative impact as the "impacts of aggregated levels of past and current air, water, and land pollution in a defined geographic area to which current residents are exposed." Further, the Legislature established

[1] 81 FR 63859: Medicare and Medicaid Programs: Emergency Preparedness Requirements for Medicare and Medicaid Participating Providers and Suppliers

requirements for a possible cumulative impact evaluation based solely on air permit activity (per Subd. 2 and Subd. 1 (h)).

Therefore, MHA urges MPCA to establish clear and precise screening criteria for cumulative impact assessments to ensure that hospitals can understand the process and plan accordingly. Specifically, MPCA should consider clearly establishing benchmark criteria that exempts or modifies requirements for hospitals given their requirements to operate and maintain generators to ensure minimal disruption to patient care. Further, benchmark criteria should be fashioned in such a way as to differentiate cumulative impact analyses between new permits and permit renewals.

2) Establish the required content of a cumulative impacts analysis and provide sources of public information that an applicant can access regarding environmental stressors present in an EJ area.

   MHA urges MPCA to clearly define what is and what is not relevant to assessing cumulative impacts and encourages consideration for the unique factors that hospitals contend with to provide critical patient care services. Further, rule must clearly define the process for when a hospital, or any permit applicant, has completed the process and is not required to submit any more information.

3) Define conditions, criteria, or circumstances that establish an environmental or health impact as a substantial adverse impact.

   MHA urges MPCA to consider specific and unique conditions, criteria, and/or circumstances for hospitals. It is highly likely that any substantial adverse impact, which is yet to be defined, generated by a hospital will be the result of operating under generator-based power during a power outage. This potential scenario does not represent an undue harm, burden, or disproportionate environmental risk, especially given that hospitals are required to adhere to regulated environmental performance standards[2] for their emergency and standby power systems. Hospitals are required to serve their patients under all circumstances and MPCA should take this into account when potentially addressing substantial adverse impacts.

Similar to the responses to the questions above, on questions 4-7 MHA urges MPCA to precisely define the elements included in the community benefit agreement and the process for entering into one, in the petition process for residents in the environmental justice area, and in the methods for holding public meetings and handling public comments. Further, MHA supports Tribal Governments' authority to implement these requirements consistent with the legislation and rules.

In closing, MHA is appreciative for the opportunity to provide comment on the planned new rules governing cumulative impacts analysis for permit decisions in environmental justice areas. It is our intent to remain engaged in the ongoing rulemaking process on behalf of our members and the patients and communities that they serve.

Thank you for consideration of our comments.

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Danny Ackert
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dackert@mnhospitals.org

[2] National Fire Protection Association 110: Standard for Emergency and Stand-by Power Systems https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=110

Mike Karbo Attachment
RECEIVED
By: OAH on 10/6/2023 at 1:32pm

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American Petroleum Institute

Filed electronically: OAH.Webmaster@state.mn.us.

Office of Administrative Hearings
OAH Attn: William Moore
Office of Administrative Hearings
600 North Robert Street,
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St. Paul, MN 55164-0620

October 6, 2023

Re: American Petroleum Institute Comments on Planned New Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas, Minnesota Rules, chapter 7001; Revisor's ID Number R-04805

To Whom It May Concern:

We recognize the importance of protecting the environment, ensuring public health and safety, and fostering transparency and community engagement throughout the regulatory process.

1 INTRODUCTION

1.1 OVERALL CONCERNS

The natural gas and oil industry aims to advance environmental protection, public health, and community well-being. We commend MPCA's commitment to these objectives; we also would like to offer constructive recommendations to enhance the focus and strength of the cumulative impacts rule under consideration. The recommendations encompass some broader aspects that are identified below and discussed in detail in the following text:

- *Balancing Environmental Protection and Feasibility:* It is important to balance robust environmental protection and the practicality of compliance for the regulated community. MPCA should design the rule to ensure environmental justice protections without imposing undue impacts and consequences on the economic viability of the overall community.
- *Clarity and Precision in Rule Language:* As MPCA's environmental justice regulatory program unfolds, API urges MPCA to avoid potential ambiguities or vagueness in the rule language, particularly in defining criteria, definitions of terms, and assessment triggers and considerations. Ambiguity can lead to uncertainty and confusion and hinder meeting the objectives of the regulatory program.
- *Cumulative Impacts Analysis (CIA) process:* The introduction of a Cumulative Impacts Analysis (CIA) is a significant and commendable step. However, the potential complexity and resource requirements associated with CIAs could be monumental. We

urge the agency to ensure that the CIA process is well-defined, feasible, and adaptable to various project types based on readily available information and data.

- *Proactive Communication and Collaboration for Transparent Regulatory Processes:* MPCA needs to engage in proactive communication and collaboration with industries to ensure that the regulatory process remains transparent and that potential impacts and mitigation strategies are understood by all parties involved. This proactive approach can help build trust, facilitate cooperation, and address industry concerns effectively. For example, it is crucial to ensure that the relevant agency or entity appropriately addresses potential outcomes from assessments, preventing situations where industries are held accountable for stressors beyond their control.
- *Flexibility and Adaptability:* The cumulative impact regulatory framework should exhibit flexibility and adaptability to accommodate varying project sizes, contexts, and technological advancements. Rigid rules may not account for emerging industry practices and innovations or varying community priorities.

In the following sections, we will provide specific recommendations to address these aspects and offer some considerations and suggestions to improve the overall effectiveness and fairness of cumulative impact rules.

2 SPECIFIC AREAS FOR CONSIDERATION

2.1 BENCHMARKS FOR CUMULATIVE IMPACTS ANALYSIS

Clarity and specificity are vital in ensuring regulated entities can consistently and accurately determine when a cumulative impact analysis is required. We propose making the criteria identified to trigger cumulative impact analyses as clear and specific as possible, utilizing quantifiable metrics or criteria wherever feasible. Furthermore, it would be prudent to tailor the benchmarks to ensure they are tailored to different industry sectors or project types, recognizing that the significance of impacts can vary widely.

We also recommend a consultative approach that involves industry experts, associations, and regulatory agencies in developing these benchmarks. By engaging the expertise of those familiar with industry best practices, we can ensure that the criteria align with practical and enforceable standards. Transparency in the process is essential for legitimacy and understanding. We propose that establishing criteria be transparent, with public and stakeholder input opportunities. Additionally, documenting the rationale behind each benchmark and making it available to the public would enhance clarity and foster trust in the regulatory process.

It is also crucial to consider the availability of existing emissions-evaluating tools, such as modeling, already in use for assessing the impacts of permitted sources. Introducing new rulemaking processes may divert attention and resources from well-established, proven methodologies for determining off-site impacts. Therefore, when establishing benchmarks, incorporate existing monitoring systems and readily accessible data sources and source data from credible and reputable sources to ensure the accuracy and reliability of impact assessments. Furthermore, there should be a mechanism that allows for deviations from criteria in exceptional

circumstances, provided they are supported by rigorous analysis. Also, MPCA should consider implementing pilot programs to test the practicality and effectiveness of proposed benchmarks before full-scale adoption is another prudent step. Real-world experience can offer valuable insights for refinement.

2.2 Access to Public Information

Stakeholders will need access to the environmental stressor data that HB2310 requires. To that end, MPCA should consider the community's potential challenges when accessing comprehensive and accurate general information, particularly concerning environmental stressors in environmental justice areas. In addition, the MPCA should consider the challenges the regulated entities face when trying to identify appropriate and accurate data resources to develop a CIA. To address this concern, we propose some recommendations.

Firstly, we advocate for establishing a centralized and easily accessible online repository where all relevant and necessary environmental data and information can be accessed. This repository should be regularly updated and diligently maintained to ensure the relevance and accuracy of its data. Data standardization is another critical aspect of our recommendations. We encourage standardizing data formats and metadata across agencies and organizations responsible for collecting environmental information. Standardization enhances the consistency and reliability of the information available to the public, making it easier to comprehend and analyze.

Noting that complex environmental information often poses a challenge for the public, we recommend that MPCA provide plain language summaries or fact sheets alongside technical data. This practice makes environmental information more accessible and understandable to a broader audience.

MPCA should incorporate robust data quality assurance and validation procedures to guarantee the accuracy and reliability of the information available to the public. Transparent reporting on data quality should also be provided to instill trust in the data.

MPCA should consider incorporating educational initiatives to promote environmental literacy (could include online courses, workshops, and community outreach efforts that can help the public understand the significance of the data provided.)

2.3 Ambiguity in Definitions

Clear and specific definitions are pivotal in ensuring effective addressing of cumulative impacts. Ambiguities can have detrimental consequences, such as confusion, inconsistent interpretations, and difficulties in enforcement.

For example, stakeholders frequently use terms like "significant impact" or "baseline condition" without well-defined meanings, resulting in varying interpretations. Introducing specific definitions is critical to establishing a shared understanding of the expectations. In addition to specific definitions, we ask MPCA to consider incorporating measurable metrics. Instead of relying on vague terminology like "substantial improvement," benchmarks should specify quantifiable criteria for expected improvements and how these improvements will be measured.

Such specificity enables regulated entities to set performance goals and gauge their performance accurately. Furthermore, we highlight the value of practical examples and guidance alongside criteria considerations. Real-world scenarios, when provided, illustrate how criteria can be applied.

2.4 Cost and Burden of Cumulative Impacts Analyses

While we support the need for cumulative impact analyses (CIAs), we must address the potential resource burdens that the proposed CIAs might place on the state agency and/or the regulated entities, which could be substantial in some cases.

First and foremost, we advocate for MPCA to conduct a comprehensive cost-benefit analysis of the requirements for a CIA. This analysis should delve into the potential economic impact of implementing CIAs, considering the direct costs of conducting these analyses and the broader implication of potential job impacts and the economic consequences for affected communities. This analysis can inform any further rulemaking regarding the cost associated with CIAs.

2.5 Petition Process

API supports the development of clear and accessible guidelines that outline the petition process step-by-step. These guidelines should be written in plain language, ensuring residents can easily comprehend and follow the process without confusion.

Standardized petition forms should be developed so residents or the regulated community can readily submit their requests. These forms will help ensure that all necessary information is included, making the process more efficient.

Accessibility is crucial, so we emphasize providing residents with multiple submission channels. This includes online submission, physical drop-off locations, and postal mail, ensuring that the petition process caters to the diverse needs of residents.

Acknowledgment and tracking mechanisms are essential. We propose that the regulatory agency promptly acknowledge receipt of each petition and provide a tracking mechanism. This empowers residents to monitor the status of their petitions throughout the review process, enhancing transparency. To bolster transparency further, we advocate for petitions and related documentation to become part of the public record. This means they should be accessible and subject to public review.

Timeliness is a critical factor, so we recommend that MPCA commits to reviewing and responding to petitions within a reasonable timeframe. Establishing a defined response timeline can prevent permit or project delays, ensuring residents and the regulated community receive timely feedback.

2.6 Community Benefit Agreements

We recognize the vital role that Community Benefit Agreements (CBAs) play in promoting positive community outcomes, but we are also aware of the potential challenges associated with

their implementation. Our primary concern is ensuring that CBAs effectively balance the community's needs while remaining practical and achievable for regulated entities.

First and foremost, API supports including clear and specific requirements within CBAs. These requirements should provide clarity to all parties involved, ensuring that the obligations and commitments outlined in CBAs are actionable and measurable. This clarity in CBAs is essential for effective implementation. Flexibility is another essential aspect. We encourage MPCA to allow for flexibility in CBA negotiations to allow for customization based on the unique circumstances of each project and community. A one-size-fits-all approach may not adequately address the diverse needs of various communities.

To ensure that CBAs truly reflect community needs and expectations, we emphasize the importance of meaningful community input during their development. To help ensure diverse perspectives are considered, we encourage comprehensive stakeholder engagement. This includes engaging with various stakeholders, such as community organizations, local governments, and industry representatives. Inclusive engagement enriches the content of CBAs. Timeliness is crucial, so we recommend that the CBA process occurs early in the project development process. This early engagement helps ensure that community needs are considered from the outset, helping to prevent delays later in the project.

Performance metrics and reporting mechanisms should be integral to CBAs. Clear benchmarks and timelines are essential for tracking progress and outcomes, enhancing accountability in the process. Transparency in the negotiation and implementation of CBAs is also important, as well as accountability.

Lastly, API recommends periodic programmatic reviews of CBAs to assess their effectiveness and relevance. Based on these reviews, MPCA can make necessary adjustments to the program. This iterative approach ensures that CBAs remain practical tools for community benefit.

2.7 QUANTIFYING IMPACTS

As discussed in section 2.1, defining what constitutes a "substantial adverse impact" is critical to regulatory clarity and effectiveness. Definitions should accurately identify environmental and health impacts while remaining reasonable and consistent with regulatory and industry norms.

To take it a step further, we suggest including specific, quantifiable criteria and thresholds in the definitions. These criteria should determine when an impact is considered "substantial adverse" and be tailored to the environmental context and industry sector. Regulatory agencies can guide regulated entities and the public by clarifying these criteria. Furthermore, we emphasize the importance of grounding the criteria scientifically. This involves incorporating relevant scientific research and data and engaging experts to ensure the criteria align with the latest scientific understanding. Such a foundation enhances the credibility and accuracy of the definition.

To avoid imposing undue or inconsistent standards or criteria on different sectors, we encourage alignment with industry standards and best practices, especially for industries subject to specific environmental regulations. This alignment ensures that the criteria remain practical and relevant.

A balanced approach is also crucial. We recommend considering not only the severity of impacts but also their duration. Some impacts may be short-term but severe, while others may be longer-term but less severe.

3 CROSS-REFERENCED CONCERNS

3.1 STAKEHOLDER PARTICIPATION

The agency should clarify who is eligible to participate as a stakeholder in the various processes identified by the proposed rule. For example, MPCA could consider limiting petitioners to those directly affected by the permit to ensure that petitions come from parties with a legitimate stake in the matter.

3.2 REGULAR REVIEW AND UPDATES:

We recommend establishing a formal process for regular reviews of CIAs and data sets to ensure the ongoing relevance and effectiveness of regulatory benchmarks, cumulative impact analysis criteria, and other rule components. These reviews should occur at predetermined intervals, fostering adaptability within the regulatory framework. Importantly, these reviews should incorporate feedback from regulated entities, environmental organizations, and the public. This inclusive approach ensures that a broad spectrum of perspectives contributes to rule improvement.

3.3 COLLABORATION WITH STAKEHOLDERS:

To harness the wealth of expertise and perspectives that stakeholders offer, we recommend the establishment of formal mechanisms for ongoing collaboration throughout the rulemaking process. These mechanisms should facilitate cooperation with industry representatives, environmental organizations, and community groups. Creating advisory committees or working groups that bring together diverse stakeholders enables productive input and guidance on rule development and implementation.

3.4 FLEXIBILITY AND ADAPTABILITY:

Recognizing that one-size-fits-all rules may not accommodate the diverse circumstances of regulated entities, we advocate for incorporating flexibility into the regulatory framework. This can be achieved by allowing for variances or exemptions from specific requirements in cases where strict adherence may not be practical or necessary. Moreover, considering industry-specific or project-specific criteria when establishing regulatory standards applicability is crucial. We recognize that different sectors may have varying needs and capabilities.

3.5 TRANSPARENCY AND ACCESSIBILITY:

We recommend developing and maintaining a centralized online platform that serves as a hub for accessing a wide range of environmental data, regulatory information, and updates related to rulemaking. This platform should prioritize standardizing data formats and metadata across agencies to improve data consistency and accessibility. To bridge information gaps, MPCA

should provide plain language summaries alongside technical information, enhancing understanding and accessibility for a broader audience. This ensures the public can access clear, understandable information about regulatory matters.

3.6 PUBLIC INPUT AND FEEDBACK:

An inclusive rulemaking process requires active participation from the public. We recommend establishing clear procedures for soliciting public input and feedback throughout the rulemaking process. These procedures should be comprehensive, encompassing the initial proposal and final decision-making stages. We advocate using various engagement methods to accommodate diverse stakeholder preferences and participation levels. These include public meetings, surveys, online platforms, and webinars. Public feedback should be actively considered and documented in decision-making processes. This practice demonstrates a commitment to transparency and responsiveness, ensuring that public input has a meaningful impact on regulatory outcomes.

Sincerely,

Mike Karbo
Associate Director, Midwest Region
American Petroleum Institute

RECEIVED
By: OAH on 10/6/2023 at 1:51pm
John Pollard Attachment

Comments from Operating Engineers Local 49 and North Central States Regional Council of Carpenters

Oct. 6, 2023

The Honorable Kimberly Middendorf
Office of Administrative Hearings
P. O. Box 64620
St. Paul, MN 55164-0620

Katie Izzo
Minnesota Pollution Control Agency
520 Lafayette Rd.
St. Paul, MN 55155

RE: Planned New Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas, Minnesota Rules, chapter 7001; Revisor's ID Number R-04805

Honorable Judge Middendorf and Ms. Izzo,

Thank you for the opportunity to provide initial comments on the cumulative impacts rulemaking. The International Union of Operating Engineers Local 49 (IUOE Local 49) is a labor union representing more than 12,000 Operating Engineers and their families in Minnesota, along with members in North and South Dakota. Their members include heavy equipment operators and mechanics, along with stationary engineers. The North Central States Regional Council of Carpenters (Carpenters) is a labor union representing approximately 12,000 workers and their families across Minnesota, along with members in Wisconsin, Iowa, Nebraska, North Dakota and South Dakota. Their members include carpenters, millwrights, floor coverers, lathers, pile drivers, and industrial workers across the state. Both unions work on a wide array of energy, industrial, transportation, commercial, and healthcare infrastructure projects.

As unions, we support efforts to ensure that all Minnesotans have access to healthy air in their communities. We also strongly support efforts to reduce poverty and provide economic opportunity for residents of low-income and BIPOC communities. Both of our unions have worked to actively increase union membership amongst groups that have historically been underrepresented in the construction industry through registered apprenticeship programs and partnerships with community-based organizations.

We also have significant concerns about some of the ongoing challenges related to permitting that we have witnessed in recent years in Minnesota. Our members depend on an efficient, science-based environmental review and permitting process. Until permits are issued, our members don't work. In recent years we have experienced a number of projects that would

have provided good paying jobs getting ensnared in a complex permitting and litigation process leading to delays and in some cases cancellations. There is a real risk that if not implemented right, the cumulative impacts legislation could exacerbate current permitting challenges. During a time when the federal government is providing significant subsidies to revitalize manufacturing and onshore supply chains, Minnesota is at a very real risk of missing out.

As such, we believe it is important that the cumulative impacts law is implemented in a way that is science-based and provides clarity and certainty for existing and new facilities. In drafting these rules, we encourage the MPCA to work to ensure they are appropriately tailored to provide real benefits to the most burdened communities and do not simply create procedural barriers that project opponents can utilize to slow down the regulatory process.

In addition to these overarching comments, we would encourage the MPCA to consider the following:

Benchmarks

In setting benchmarks for determining which facilities are subject to mandatory cumulative impacts analysis, the MPCA should focus on existing air pollution from federally recognized criteria pollutants under the EPA's National Ambient Air Quality Standards (NAAQS) within the community that the permittee is located in. While the legislation used demographic data to limit the geography of the cumulative impacts law, it also granted authority to the MPCA to narrow which facilities are subject to mandatory cumulative impacts analysis through benchmarks. By focusing on communities that experience unsafe levels of air pollution, the MPCA can ensure that the law is targeted in a way that maximizes benefits for communities with the worst air qualities and minimizes the burdens on facilities sited in other parts of the state.

Cumulative Impacts Analysis

In determining what information should be included in a cumulative impacts analysis we believe it is important to provide detailed clarity within the draft rules. Specific guidance will provide certainty for both communities and permit applicants in knowing what to expect in the analysis. It will also reduce uncertainty and litigation risk for permit applicants. We would also encourage the MPCA to require information that is already publicly available in order to reduce the burden on permit applicants.

Substantial Adverse Impact

In establishing criteria for whether a facility will have a substantial adverse impact on the environment or health of the environmental justice area, the MPCA should look to whether the emissions from the permit applicant meaningfully increase the overall air pollution in the community such that the community will experience substantially heightened health and environmental impacts due to the increase in air pollution from the permit applicant, in conjunction with existing environmental stressors.

As such, just because a facility with a proposed permit is located within an area for which a cumulative impacts analysis is required, it does not necessarily mean the facility will have a substantial adverse impact. Many communities face pollution from a range of point and non-point sources and may not be substantially adversely affected by a single facility seeking a permit. The MPCA should ensure that there is an opportunity to implement reasonable mitigation and pollution control technology to avoid a finding of substantial adverse impact.

Furthermore, in determining whether there is a substantial adverse impact, the Commissioner must also consider the socioeconomic impacts of the facility to the residents–this should include job impacts and local tax benefits. These factors can be weighed against the incremental health and environmental impacts of the permit.

Community Benefits Agreements

While there may be a range of components that could be incorporated into a community benefits agreement, one option for the MPCA to consider would be the inclusion of a workforce plan that includes partnerships between labor unions and local community organizations with the goal of maximizing apprenticeship opportunities for members of impacted communities.

Existing Facilities

Existing facilities seeking permit renewals or amendments are in a unique position because they are already located within a specific community and are not able to move locations easily because of sunk capital costs. These facilities were sited and constructed prior to the cumulative impacts law and would not have known at the time that they would face the additional requirements from the law based on their geography. We would encourage the MPCA to consider alternative criteria or streamlined processes for these facilities to ensure workers at these facilities don't face ongoing uncertainty about the status of their jobs.

Aggregate Materials

One of the potentially most impacted industries of this new law is aggregate and ready-mix production. That industry has the unique requirements of only being able to operate in locations where there is the proper geology to create a product that meets the standards required for safe road and building construction. It is also important that this material be produced within the metro area to ensure there are cost-effective construction materials to meet the needs of ongoing and planned infrastructure projects. We would encourage the MPCA to recognize some of these unique attributes and work with industry representatives on a pathway to implementation that avoids adverse impacts to the aggregate mining operations and broader construction industry.

Thank you for your consideration of our initial feedback. We look forward to working with the MPCA on successful implementation of the cumulative impacts law in a way that benefits communities, workers, and businesses.

Respectfully,

John Pollard, Legislative Director, International Union of Operating Engineers Local 49

Adam Duininck, Director of Government Affairs, North Central States Regional Council of Carpenters

RECEIVED
By: OAH on 10/6/2023 at 2:00pm
Rachel Johnson Attachment

October 6, 2023

William Moore
Office of Administrative Hearings
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St. Paul, MN 55164

Subject: Planned New Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas, *Minnesota Rules*, Chapter 7001; Revisor's ID Number R04805

Dear Mr. Moore:

The Area Partnership for Economic Expansion (APEX), a leading economic development organization representing over 90 investor-members, in collaboration with the Duluth Area Chamber of Commerce, which boasts a membership of over 1,000 businesses, and the Range Association of Municipalities and Schools (RAMS), representing over 70,000 residents of 27 cities, 24 townships and 15 school districts within the 13,000 square miles of the Taconite Assistance Area on Northeastern Minnesota's Iron Range, wish to address our strong interest and concern regarding the upcoming rule-making process related to Cumulative Impacts (CI) on air permitting for businesses in our state. Our focus is particularly on Duluth and the designated Environmental Justice (EJ) areas.

We wish to emphasize that the implications of this new law extend beyond just the businesses located within the EJ areas. It has broader regional ramifications for the entire Iron Range of Minnesota and businesses in neighboring states that rely on the Port of Duluth-Superior. These industries span forestry, mining, energy, tourism, and consumer goods, among others.

While we deeply appreciate and understand the intent behind the Minnesota Pollution Control Agency's efforts in safeguarding our environment and public health through effective air permitting regulations, we believe that the forthcoming rules addressing Cumulative Impacts could significantly impact our local businesses, communities, and overall economic development.

Our organizations are unwavering in our commitment to the equitable, sustainable growth and prosperity of Duluth and the surrounding areas. Given our insights, experience, and intimate knowledge of the local landscape, as well as our steadfast efforts to diversify, revitalize, and grow our regional economies to meet the needs of our shared, sustainable future, we are confident that we can offer invaluable input to shape these regulations in a manner that harmoniously blends environmental stewardship with economic vitality.

To this end, we've identified several areas of concern with the Minnesota Pollution Control Agency's (MPCA) cumulative impacts rule:

1) **Establishing Benchmarks**: We recommend setting benchmarks on current pollution levels to serve as MPCA's reference point when reviewing permit applications.
    a) Facilities with existing air permits in good standing that are seeking renewals should not necessitate a cumulative impact analysis.
2) **Petition Process**: There's a need for greater clarity around the petition process to ensure businesses understand and can navigate the system efficiently.
3) **Permit Acquisition Timeline**: We urge the MPCA to track the duration required for a facility to obtain a major air source permit and the potential delays introduced by a CI analysis.
    a) An unpredictable or prolonged timeline could inadvertently impact employment opportunities in our communities.
4) **Inclusion of Socioeconomic Factors**: It's crucial that the proposed rule's environmental stressors also consider the socioeconomic elements.
    a) Increased uncertainty in the permitting process could adversely affect business retention, expansion, and the job market in our communities.

In conclusion, we are steadfast in our commitment to constructive engagement and meaningful dialogue throughout this pivotal process. Our shared objective remains the enhancement of the well-being of our community, the broader Iron Range region, and the environment.

We kindly request an opportunity to meet and discuss these concerns in detail, ensuring that the final regulations are both effective and equitable. Thank you for considering our input during the rule-making process. We are eager to collaborate and address Cumulative Impacts in a way that benefits all stakeholders.

Respectfully submitted,

Rachel A Johnson

Rachel Johnson
President & CEO, APEX

Matt Baumgartner
President, Duluth Area Chamber of Commerce

Paul Peltier
Executive Director, Range Association of Municipalities and Schools (RAMS)

RECEIVED
By: OAH on 10/6/2023 at 2:20pm

Clean Water Action has been present in Minnesota since the 80s. During these last 40 years, we have been fierce advocates for protecting our water, air, and environment. We have seen the ways that pollution affects our environment and communities, and have fought hard to ensure those communities have access to clean air and water. Our colleagues in New Jersey were instrumental in passing the NJ cumulative impacts law, as they too understood that the harms of pollution are not distributed equally.

Every Minnesotan deserves to live in a clean and healthy environment. Yet our regulatory system has failed to provide that for many of our communities. For decades, polluting facilities have been cited in areas that contain larger populations of Black, Indigenous, and People of Color, as well as low income communities. Old practices such as redlining and racial covenants created segregated communities across the state, and these marginalized communities became easy targets for polluting facilities, given the communities' lack of political power. This centralization of polluting facilities, along with other environmental, health, social, and economic stressors have created clear health disparities in Minnesota. This must change.

The cumulative impacts law was passed with the clear intent of preventing new sources of pollution into overburdened communities, and reducing current pollution in those areas. The Minnesota Pollution Control Agency (MPCA) must fulfill this intent, and create rules that work for our most overburdened communities.

The process for creating these rules must be collaborative, and must engage communities that the MPCA has failed to engage previously. The MPCA must work to build connections and bring community members into the process, and also find ways to meet the community where they are. There is a clear need for education about cumulative impacts, the harms of air pollution, and the reason this law was passed. While many people know instinctively if they live in an overburdened community, the MPCA and Minnesota Department of Health (MDH) have clear data showing the health disparities in the state, many of which are a result of exposure to pollution.

Minnesotans deserve to know about sources of pollution that are directly impacting their health. They also deserve a true say in whether or not major facilities and projects get added to their community if they are already facing a disproportionate burden of pollution. Any facility with the potential to negatively affect the health of the surrounding community should be conducting an analysis. Additionally, the analysis should follow a similar, data driven approach as New Jersey's. This creates an easier process for a permit applicant, makes the analysis easier to understand for the general public, and creates a clear framework for defining substantial adverse impact. Finally, the community benefit agreement must center community leadership, and ensure that the MPCA cannot enter into the agreement without explicit community support. There must also be a clear way for a community benefit agreement to be nullified if the facility owner or operator is not meeting the requirements set out in the agreement, and a facility that breaks the agreement must lose its permit until a new agreement is created.

We would also like to point out that the website for submitting comments online is woefully outdated. Online comments should be easy to submit, both on PC and mobile. Many community

members do not have easy access to a computer, and can only submit comments on their phone. Having to navigate the website to find the right topic, set up an account, and find the button that allows you to submit a comment is not an easy task for anyone unfamiliar with the website. Even finding the right topic from the Office of Administration homepage is unintuitive. Having an easy to understand website for submitting comments that is easy to navigate on both PC and mobile is essential for ensuring everyone can participate.

We will be closely following this process and sharing information with our members. Thank you for your consideration.

Clean Water Action Minnesota

RECEIVED
By: OAH on 10/6/2023 at 2:22pm
Hudson Kingston Attachment

CURE

117 South First Street • Montevideo, MN 56265

October 6, 2023

Submitted via: OAH Rulemaking eComments website

OAH attn: William Moore
600 North Robert Street
P.O. Box 64620
St. Paul, MN 55164-0620

RE: CURE's Comment to MPCA and the OAH regarding the Cumulative Impacts rulemaking

Dear Mr. Moore,

As a community-based organization dedicated to uplifting rural voices and strengthening rural communities, CURE is proud to be a member of the Frontlines Communities Protection Coalition,[1] a coalition of organizations and community members from across the state who advocated and fought for the Cumulative Impacts Law, enacted as Laws of Minnesota 2023, chapter 60, article 8, section 3. The Cumulative Impacts Law promises a first step towards addressing the heavy burden of pollution borne by frontline communities, but without robust rules that truly address the pollution-related harms facing communities the law cannot meet its obvious legislative intent.

As an organization that is dedicated to the health and empowerment of rural communities and individuals, we were also deeply disappointed when the protections of this law were walked back to include only certain geographic areas, rather than the whole state. Nevertheless, communities throughout the state deserve the utmost protection under this law and should not be further excluded from the process. Significant portions of two cities outside of the state's urban core are already included in the current version of the law. Sovereign Tribal Nations have the option to apply this law to facilities that impact their reserved lands, so any rules promulgated today must be sufficiently inclusive to protect tribal lands should they be designated in the future.

The Minnesota Pollution Control Agency (MPCA) has a duty to Minnesota's most impacted communities and peoples to fully enact a law that counters a long history of industry capture, and

[1] More information on the Coalition's work available at https://fcpcmn.org/.

finally returns meaningful decision-making authority to the people, as the legislature commanded MPCA to do.

I. Interest of CURE

"Environmental justice" is not a term that is used frequently in rural America, nor does it always resonate in Minnesota's rural communities. However, regardless of the terminology, we know that the disparate impacts of climate change and pollution results in increased environmental burdens and lives lost in some places more than others. Safe drinking water across the state—and especially in our struggling small cities, towns, and rural areas—is at risk due to increased nitrate pollution and deteriorating water infrastructure. Recent research shows that while particulate matter pollution in the air tends to be greater in big cities—with unconscionable deadly effects—the toxicity of that pollution is just as high if not higher in Midwestern rural places, especially during the summer growing season, posing an especial threat to farmworkers.[2] Meanwhile, longstanding health-care challenges in non-metro communities means that our most vulnerable residents cannot access the healthcare they need when they experience pollution-related illnesses. The disproportionate environmental impact of pollution is a dangerous phenomenon outside of cities, including rural low-income, Indigenous and tribal communities, and communities of color.

The Leech Lake Band of Ojibwe's Department of Resource Management estimates that groundwater under more than 325 acres of their land remains contaminated due to the toxic legacy of polluting paper mills in the region. It was also recently reported that the Band learned that legacy PFAS pollution had made the water at one of its schools too dangerous for students to consume.[3] These legacy environmental issues, some of which only come to light years after the damage has been done, are evidence of the harm faced by frontline communities. Regulators at MPCA and other agencies should have been working to prevent this damage, but too often they have showed little ability to do so.

Many rural communities in Minnesota are caught between legacy pollution from leaking underground storage tanks and an MPCA that does not prioritize or adequately oversee cleanup operations. Rather than cleaning up pollution dating from before the 1980s in Paynesville, MPCA reportedly left the polluted soil and groundwater plume in place, asserting that Paynesville city government didn't need to worry about such things.[4] Luckily for residents, the legislature and city government did not follow MPCA's advice and instead paid a significant amount of money to clean the city's drinking water after MPCA failed to remediate the environmental pollution. Many communities in Minnesota may be harmed by similar pollution but not have the resources or information that Paynesville had, meaning

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[2] Lois Yoksoulian, *Rural air pollution may be as hazardous as urban, study finds*, University of Illinois News Bureau, Jan. 26, 2022, https://blogs.illinois.edu/view/6367/13739985.

[3] Deena Winter, *Forever chemicals found in tribal school well on Leech Lake reservation*, Minnesota Reformer, Sept. 1, 2023, https://minnesotareformer.com/2023/09/01/forever-chemicals-found-in-tribal-school-well-on-leech-lake-reservation/.

[4] https://www.mprnews.org/story/2022/06/28/four-minn-cities-get-state-money-to-study-petroleum-leak-sites.

that many rural communities could be unknowingly harmed by MPCA's failure to fully address legacy leaded-gasoline pollution.

The months-long radioactive tritium leak at the Monticello Nuclear Power Plant is another recent example of MPCA failing to move swiftly to protect Minnesota waters and rural populations from known sources of pollution. Despite the fact that MPCA was notified of the leak in November 2022, it was only in March of 2023 that the agency began speaking openly about the leak, and only after the news media broke the story using information posted by federal regulators.[5] Nearby residents were told, many months late, to not worry about the large amount of radioactive water being discharged to the aquifer they use for drinking water. MPCA later claimed it would have properly notified the public if some unmet threshold had been reached, a standard of secrecy that MPCA leadership continued to defend even when Xcel admitted mistakes were made.[6] Despite MPCA's lack of concern, the leak was uncontrolled and eventually caused Xcel to trigger an unplanned shutdown of the plant to focus on cleanup.[7] This prolonged lack of transparency and failure to inform the people drinking water from the affected water source leaves rural Minnesotans wondering how many industrial spills and harmful pollutants are in their water without any notification from the agency that ostensibly exists to protect them from such hazards.

Tribes with authority and capacity to deal with environmental spills and disasters have also been regularly kept in the dark about impacts to their communities and resources. As one example, a coal train derailed and polluted the Fond du Lac Band of Lake Superior Chippewa's lands and waters in 2019.[8] Even though the Band has obvious jurisdiction over its lands and waters and staff trained for emergency response and environmental monitoring, the train company did not notify tribal authorities for four hours. Even after that notification, the tribe's staff was refused access to the site for a time, further hampering their ability to plan and execute an emergency response. This type of disrespect and disregard must be eliminated entirely within Minnesota's borders—MPCA rulemaking under the Cumulative Impacts Law and associated legal duties (discussed more below) must clarify to all regulated industries that they owe immediate and accurate information to all governments who are impacted by emergency or routine discharges of pollutants to the environment. Failing to include

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[5] Michael Phillis & Amancai Biraben, *Regulators: Nuclear plant leak didn't require public notice*, Associated Press, Mar. 18, 2023, https://apnews.com/article/xcel-energy-nuclear-leak-tritium-6e522afbb12ad26925c40d8338530 88d.

[6] Kirsti Marohn and Anna Haecherl, *What we know about the Monticello nuclear plant tritium leak*, MPR News, Mar. 27, 2023, https://www.mprnews.org/story/2023/03/22/what-we-know-about-the-monticello-nuclear-plant-radioactive-tritium-leak (quoting Kirk Koudelka).

[7] Kirsti Marohn, *Xcel to temporarily shut down Monticello plant amid new tritium leak*, MPR News, Mar. 23, 2023, https://www.mprnews.org/story/2023/03/23/xcel-to-temporarily-shut-down-monticello-plant-after-tritium-leak-continues

[8] Dan Kraker, *Fond du Lac band angry over response to coal train spill*, MPR News, Feb. 19, 2019, https://www.mprnews.org/story/2019/02/19/fond-du-lac-band-angry-coal-train-spill.

sovereign tribes and their expert staff in emergency response or permitting is a failure both to comply with applicable laws, as well as a misuse of resources that harms communities and public trust.

Finally, this rulemaking must recognize that our smaller towns and cities are often industrial centers with neighborhoods that bear disproportionate pollution burdens. Although it is not designated a "class-one city," the city of Mankato is host to a large number of major air permit facilities such as Xcel Energy's Wilmarth facility, a Refuse-Derived Fuel (RDF) incinerator that is the second-largest incinerator in the state after the Hennepin Energy Resource Center in Minneapolis. According to MPCA's most recent point source emissions data, in 2021 the Wilmarth facility was the largest emitter in Blue Earth County of nitrogen oxides (NOx), and the second largest emitter of CO_2e and sulfur dioxide. Nitrogen oxides are known to have direct adverse respiratory effects including airway inflammation and asthma. They also can combine with other criteria pollutants such as sulfur dioxide to form secondary particulate matter, which can contribute to cardiovascular and respiratory disease and premature death. These emissions are especially concerning given that the areas surrounding the Wilmarth facility are a defined environmental justice community of concern. According to MPCA's most recent The Air We Breathe report, these areas have estimated air pollution exceeding health benchmarks with permitted facilities being one of the primary contributors.

II. Scope of rulemaking should include all applicable environmental standards MPCA is required to uphold

The above are just a few examples of the larger and persistent trends we see in all corners of this state and across the country, caused by the intersection between poverty, pollution, and political and economic power. Through this rulemaking process and subsequent rules, MPCA will be setting the most comprehensive standard yet for the meaning of cumulative impacts and the mechanisms to measure and apply it. The rulemaking itself may also lead us towards a better understanding of how pollution and health burdens accumulate and intersect. The process must therefore embrace the fact that all Minnesotans, no matter where they live have the right to clean air, drinkable water, and an environment that allows them to prosper.

1. *Geographic Scope*

In spite of the geographic limitations of this current law, the rules must be inclusive of the pollution sources and impacts that affect all Minnesotans including those not in urban centers. Indeed, the geographic scope of this law could change at any time, by an act of the legislature or if Tribal Nations decide to opt their reservation lands into the program. MPCA must understand that the geographic scope of the rulemaking is a fluid issue and plan for the eventual expansion of coverage, should that occur.

This rulemaking must continue to solicit input from people throughout the state, whether or not they reside within one of the four urban areas now covered by the Cumulative Impacts Law. People who live in rural areas recreate, work, shop, worship, and seek services in urban centers. Moreover, pollution emitted, discharged, or otherwise released by polluting facilities pays no mind to artificial borders

when traveling downwind, into water tables, and downriver, meaning that MPCA must solicit meaningful input from all impacted people throughout the state even if they are not currently residing in one of the census tracts at the center of this rulemaking.

2. *Legal Scope*

The Request for Comment on the Cumulative Impacts Law states: "The MPCA is required to undertake this rulemaking to comply with Laws of Minnesota 2023, chapter 60, article 8, section 3, and the scope of this rulemaking is limited to that purpose." While it is necessary for MPCA to implement the new Cumulative Impacts Law in this proceeding, it is incorrect and insufficient to limit the scope of the rulemaking to only this new state law. This is because by its very nature this rulemaking must be "cumulative" and account for other legal duties of MPCA that overlap and complement the Cumulative Impacts Law. If this rulemaking is limited to the law passed earlier this year without any additional standards based on treaty rights, the Minnesota Environmental Rights Act (MERA), the Minnesota Environmental Policy Act (MEPA), the Administrative Procedures Act, or the requirement that MPCA engage in meaningful consultation with Tribal Nations in Minnesota Statute 10.65, then this rulemaking will fail to address "cumulative impacts" in accordance with the legal rights of communities impacted by such burdens. If MPCA seeks to comply with the spirit of the law, not to mention clear legal requirements in existing law, it must broaden the scope of what it will include and reference in this regulatory process.

a. **Treaties, Treaty Authorities, and Tribes**

As one example, areas covered by the Cumulative Impacts Law now already require MPCA to incorporate tools to enforce treaty rights and MEPA's protections of cultural heritage. It is well documented that Minnesota state agencies have desecrated sacred Indigenous sites within Duluth city limits repeatedly, and largely because of their failure to properly consult tribes and listen to their concerns. The Minnesota Department of Transportation unearthed and damaged Indigenous burial sites in a highway project in 2017,[9] causing years of work for the Fond du Lac Band of Lake Superior Chippewa, who took the principal role in remedying the damage over the next five years.[10] Ultimately DOT had to abandon the failed project, demonstrating the significant costs of poor planning and failing to consult, not to mention the permanent damage done to historic sites and sacred remains. More recently, in another highway project, work was again halted because human remains were disturbed,

[9] Lisa Kaczke, *MnDOT redesigning Highway 23 project*, Duluth News Tribune, Aug. 8, 2017, https://www.duluthnewstribune.com/news/mndot-redesigning-highway-23-project.
[10] *MnDOT: Tribe will take over burial recovery in Fond du Lac*, Duluth News Tribune, Apr. 30, 2019, https://www.duluthnewstribune.com/news/mndot-tribe-will-take-over-burial-recovery-in-fond-du-lac; Jana Hollingsworth, *Fond du Lac Band commemorates new cemetery after graves desecrated in road project*, Star Tribune, Oct. 1, 2022, https://www.startribune.com/after-desecration-fond-du-lac-commemorates-new-cemetery/600212002/.

this time triggering far more robust procedures under DOT's agreements with the tribes based on lessons learned from past mistakes.[11]

MPCA can and must learn from the mistakes of others. It is not sufficient to ask forgiveness for the desecration of sacred sites, Minnesota agencies and permittees must identify harms ahead of time and prevent them entirely based on the known hazards. In the context of the Cumulative Impacts Law, this means recognizing that all of the identified environmental justice land within Duluth is also subject to the 1854 Treaty of La Pointe, meaning that MPCA must consult with tribal parties to that treaty whenever issuing major permits within that territory. This would be a minimum requirement of existing federal law—all treaties are the supreme law of the land under the U.S. Constitution and supersede inconsistent state law.

However, to fully implement the Cumulative Impacts Law, the MPCA must do far more to respect Indigenous rights and knowledge. This is because while the land in Duluth is subject to the 1854 Treaty, the impacts of pollution from Duluth facilities has far larger consequences for relevant tribes and communities. To properly account for such impacts, MPCA's consultation on these regulations (and in the procedures of the regulations themselves) must include information sharing and consultation with affected tribes, the 1854 Treaty Authority, and other expert tribal intergovernmental organizations such as the Great Lakes Indian Fish and Wildlife Commission (GLIFWC). Not only can these tribal nations and treaty authorities help MPCA to avoid violations of treaty rights, the knowledge they can share will be useful in better understanding the foreseeable cumulative impacts of pollution attributable to facilities that seek permits from the MPCA. Consulting with these governments and entities is both a necessary legal requirement and a best practice for MPCA to increase its own knowledge and appreciation of the types of impacts that are relevant to tribal experts and their communities.

Moreover, as noted above, any tribe in Minnesota can opt into the coverage of the Cumulative Impacts Law at a later date. Since the law's scope ultimately may cover larger parts of Minnesota than the four areas first identified by MPCA's initial analysis, MPCA must now consult with all tribes and treaty authorities with any jurisdiction within Minnesota, assuring that they understand this process and are able to influence how the regulations are crafted.

b. MEPA, MERA, and Other MPCA Duties

It is also important for MPCA to note now that it has additional duties and powers under existing laws such as MEPA and MERA. These duties and powers should be fully incorporated into this rulemaking to avoid setting the bar too low for protections of public health and the environment.

[11] Jimmy Lovrien, *Indigenous remains found during Twin Ports Interchange construction*, Duluth News Tribune, Mar. 9. 2023, https://www.duluthnewstribune.com/news/local/indigenous-remains-found-during-twin-ports-interchange-construction.

For example, MEPA has numerous tools and standards that will make MPCA's implementation of the Cumulative Impacts Law more useful and relevant to Minnesotans and scientists going forward, if properly incorporated. MEPA includes the right of 100 or more Minnesotans to petition for an EAW when an agency contemplates a major action that may have the potential to impact the environment.[12] The Cumulative Impacts Law includes a duty on MPCA to engage in community benefit agreements, which by their very nature must minimize harms to communities and should only be enacted with the informed consent of the community. As a result of these consistent duties under the two laws, MPCA's regulations should clearly state that if, under MEPA, the community petitions for an EAW of an existing or proposed community benefit agreement, MPCA will always grant the petition. There is no reason for the agency to waste resources or time evaluating a petition for an EAW in the context of the Cumulative Impacts Law, granting all petitions will encourage full disclosure of anticipated impacts as well as giving affected communities needed information about what MPCA knows of the projects they are considering permitting.

Another part of MEPA clearly requires MPCA to establish non-biased expert advisory panels in order to better manage the ongoing work of improving impacts analysis under the Cumulative Impacts Law. MEPA's section 3, Minnesota Statute 116D.03, places many mandatory duties on MPCA that are directly relevant to this rulemaking. Subdivision 2 of that section states that MPCA "shall":

> . . . .
> (2) utilize a systematic, interdisciplinary approach that will insure the integrated use of the natural and social sciences and the environmental arts in planning and in decision making which may have an impact on the environment; as an aid in accomplishing this purpose **there shall be established advisory councils or other forums for consultation with persons in appropriate fields of specialization so as to ensure that the latest and most authoritative findings will be considered in administrative and regulatory decision making as quickly and as amply as possible**;
>
> (3) identify and develop methods and procedures that will ensure that **environmental amenities and values, whether quantified or not, will be given at least equal consideration** in decision making along with economic and technical considerations;[13]

At minimum, these subdivision parts require MPCA to engage with an advisory council of <u>unbiased</u> experts and community representatives to continually assess and improve the analysis of cumulative impacts and the promulgation of community benefit agreements. The emphasized text in part 3 makes

[12] *See* Minn. Stat. 116D.04, Subd. 2a(e), ("An environmental assessment worksheet must also be prepared for a proposed action whenever material evidence accompanying a petition by not less than 100 individuals who reside or own property in the state, submitted before the proposed project has received final approval by the appropriate governmental units, demonstrates that, because of the nature or location of a proposed action, there may be potential for significant environmental effects.").
[13] Minn. Stat. 116D.03, Subd. 2 (emphasis added).

clear that the community's concerns about their own human environment is at least as important, and likely more important, than the economic or technical positions furthered by project proposers.

Unfortunately, MPCA has a long and enduring history of treating regulated industries as customers, which in the current day MPCA euphemistically calls "stakeholders." As a result, when promulgating guidance on how to remediate PFAS pollution, MPCA not only let the regulated industry dominate its "stakeholder" process,[14] it even sought consensus among "stakeholders" for the content of the guidance document.[15] This is industry capture masquerading as an inclusive regulatory process. In the context of the Cumulative Impacts Law, MPCA must eliminate this industry bias that is not only harmful to policymaking and offensive to frontline communities, but also militates against MEPA's clear dictate that environmental amenities and values are more important than economic and technical considerations. In order to serve Minnesotans and protect them from the cumulative impacts of pollution as the law requires, MPCA's rules must include actual community stakeholders and not elevate permit applicants into decision-making positions as it has done in other recent contexts.

This part of MEPA goes on to require MPCA to:

> (4) study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources;
> . . . .
> (6) make available to the federal government, counties, municipalities, institutions and individuals, information useful in restoring, maintaining, and enhancing the quality of the environment, and in meeting the policies of the state as set forth in Laws 1973, chapter 412;
> . . . .
> (8) undertake, contract for or fund such research as is needed in order to determine and clarify effects by known or suspected pollutants which may be detrimental to human health or to the environment, as well as to evaluate the feasibility, safety and environmental effects of various methods of dealing with pollutants.[16]

These requirements are all demonstrations of MPCA's existing duties of both transparency and rigorous analysis of environmental harms. It is not enough for the agency to take data from an applicant and

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[14] *See* MPCA, Developing PFAS remediation guidance, https://www.pca.state.mn.us/business-with-us/developing-pfas-remediation-guidance (describing the stakeholders selected for the group advising MPCA on the guidance document).

[15] On October 3, 2023, MPCA sent an email on this guidance, which stated, in part: "The PFAS Guidance was developed in coordination with an external stakeholder group. The stakeholder group is comprised of representatives from academic, consulting, legal, financial, and municipal sectors. Primary goals of convening external stakeholders are to obtain feedback from affected stakeholders and ensure a transparent process with resulting guidance that is consistent and predictable. The stakeholder group met regularly during the development to reach consensus on the content of the PFAS Guidance."

[16] Minn. Stat. 116D.03, Subd. 2.

view that as sufficient environmental analysis to complete a cumulative impacts analysis—the agency has an affirmative duty to study alternatives and fund research that is needed to properly assess the full anticipated impacts of a permitting decision. MPCA must make its information available to the public and other units of government. As such, the process of producing a cumulative impacts analysis must be fully transparent and avoid industry capture by allowing communities to understand how much of the data set was submitted or controlled by the applicant, and how much independent analysis and science the agency conducted to verify and enhance the knowledge of impacts.

Similarly, MERA clearly applies both in judicial challenges and administrative proceedings.[17] Thus, to fully integrate MERA's protections and the Cumulative Impacts Law, MPCA's regulations must provide for an impartial third-party review of any concerns raised by affected communities, with an opportunity for communities to present a MERA challenge if a proposed project will have adverse impacts or pollute, destroy, or impair the environment. Providing for an administrative route for MERA challenges will not only aid in transparency and public participation, it could save significant resources by ultimately avoiding full litigation in courts of law. By incorporating these legal standards into the process and making them more available to impacted communities, MPCA could conserve resources while better serving groups of people who lack trust in regulators' ability to say no to bad projects.

III. Conclusion

CURE urges MPCA to look closely at its past and recent failures to protect Minnesota communities from cumulative environmental harms and learn from these errors. In that process, MPCA should fully consult with tribal experts including inter-tribal treaty authorities and other relevant experts. The agency must do better than calling polluters "stakeholders" and giving them a blank check to control their own permitting processes. The Cumulative Impacts Law is meant to correct decades of neglect and industry capture, it is now time for MPCA to adhere to its public purpose and serve the people in line with this new law, MEPA, MERA, and treaty rights that have been controlling law since before Minnesota was even a state.[18]

The initial Cumulative Impacts Law, with its limitation on types of permits as well as its geographic scope, will not yet address the harms of industrial pollution in our rural places. But that may very well change as Minnesotans see the value of the law's protections that ensure that the terms of development in our most burdened communities are not dictated only by the economic prerogatives of polluting industry. The Cumulative Impact Law instead creates space for the kind of development that brings real

[17] *See*, *e.g.*, Minn. Stat. 116B.09, allowing any person to intervene in administrative proceedings to enforce MERA.

[18] For example the 1837 Treaty between the United States and the Chippewa reserves the right to hunt, fish, and gather wild rice across central Minnesota, an area that will be impacted by the cumulative impacts of air pollution from facilities MPCA regulates with major air permits in environmental justice communities. *See* Minnesota DNR, Treaty with the Chippewa July 29, 1837, https://www.dnr.state.mn.us/aboutdnr/laws_treaties/1837/index.html. MPCA is bound by this treaty to assess and minimize impacts on these treaty-protected resources.

value to the people that live and work in the communities that need it most. And it will give these communities a greater say on where and when that development happens and at whose expense or benefit.

MPCA must promulgate standards that protects all communities impacted by cumulative impacts, and gives community members and leaders the autonomy to prevent new harms from accumulating on existing ones. By having a fully inclusive and comprehensive rulemaking process, and including community rights to appeal and challenge within the rules, MPCA can serve the larger population while also continuing its work regulating polluters in search of updated or new permits.

/s/ Hudson Kingston
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CC: Rule Coordinator Katie Izzo, MPCA, katie.izzo@state.mn.us

RECEIVED
By: OAH on 10/6/2023 at 2:40pm

October 6, 2023

Frontline Communities Protection Coalition comment on Minnesota Pollution Control Agency rulemaking for the Cumulative Impacts Law

We are members of the Frontline Communities Protection Coalition, a group of environmental and frontline community organizations, working to address environmental injustice at a systemic level, and to support fights for environmental justice across the state. We appreciate the opportunity to submit comments on the cumulative impacts rules and rulemaking process.

By passing this law, the Minnesota legislature acknowledged the historic and ongoing harms upon people of color, low-income people, and neighborhoods that have been treated like sacrifice zones. The point of the law is to **stop** adding new pollution and decrease the existing burden of these communities in our state. All rulemaking decisions need to be held to this standard. We urge you to include our coalition's feedback as the Minnesota Pollution Control Agency (MPCA) begins crafting rules that are intended to fulfill the purpose and promise of the law.

Minnesota Health Disparities

The cumulative impacts law was passed with the express goal of addressing the harsh disparities in public health that marginalized communities in Minnesota are facing. Historical and current systems of racism and discrimination have resulted in the disproportionate and unjust placement of highways and polluting industries in neighborhoods with higher proportions of Black, Indigenous and People of Color (BIPOC), people experiencing poverty, or people with limited English-language proficiency, who are defined as environmental justice communities for purposes of this new law.

In addition to being burdened by higher levels of pollution from traffic and industrial sources, environmental justice communities are more likely to experience higher rates of unemployment, poverty, arrests, and incarceration while also facing systematic barriers to homeownership, generational wealth, educational attainment, livable wages, and healthy food access. These underlying socioeconomic disparities and higher pollution levels result in health disparities, including shorter lifespan, higher rates of infant and maternal mortality, and higher incidence of heart disease, cancer, asthma, and diabetes. For example, Black and American Indian infants are twice as likely to die before their first birthdays as white infants in Minnesota.

MPCA and MDH's March 2023 reports, *Life and Breath: Metro* and *Life and Breath: Greater Minnesota* highlight the impact of air pollution on premature deaths and hospitalizations in Minnesota. "In the Twin Cities metro, air pollution played a role in 10% of all deaths (about 1,600 people) along with nearly 500 hospitalizations and emergency room visits for heart and lung problems." Air pollution also played a role in an estimated 280 deaths in Greater Minnesota. "Reducing air pollution is part of state agencies' overall strategy to address structural inequities in health care, housing, and other social factors that influence health."

The cumulative impact rules must reduce existing pollution and prevent new pollution to the air, water, and soil in environmental justice areas to begin narrowing the health disparities gap and guarantee that all Minnesotans live in healthy, safe, and equitable conditions.

MPCA Has Failed to Protect Our Communities

The previously mentioned health and socioeconomic disparities are no accident. Nor are they simply the result of long gone practices and beliefs. These disparities still exist and are worsened by systems that continue to feed into the fundamentally discriminatory framework of our nation.

The MPCA has also been complicit in this discrimination. We believe it is important to lay out a few specific cases of the MPCA siding with polluting industries, and failing to protect marginalized and vulnerable communities. One of the primary reasons community members began organizing to pass a cumulative impacts law in 2017 was because of the ongoing issues with the Northern Metals facility in North Minneapolis. Residents near Northern Metals knew that the air pollution was negatively affecting their health. The agency failed to properly analyze the potential impacts of granting permits to the facility, despite North Minneapolis already experiencing severe health disparities. When the agency took action, community members described it as “more like pulling teeth”. This case, along with those listed below, are emblematic of why a cumulative impacts law was needed, and why the agency must fundamentally shift its approach with community engagement.

Line 3

The Line 3 Pipeline (Line 3) is perhaps the first issue that comes to mind for most. A controversial, dangerous pipeline proposed by a company with a history of spills and leaks, greenlit by multiple state agencies despite strong public opposition. Throughout the Line 3 project, people across the state mobilized to oppose the pipeline, planning protests, submitting comments, attending hearings, and much more. Yet despite an overwhelmingly negative sentiment from the public, the agency provided Enbridge with all the permits they needed.

The agency also failed to actually consider the climate impacts of Line 3. Granting permits for a pipeline whose high-polluting tar sands oil has the equivalent annual emissions of more than 50 coal fired plants when we are already seeing the impacts of climate change is beyond complicit. What is the purpose of an agency to control pollution if it ultimately grants permits to even projects of this magnitude?

MPCA issued key permits to pumping stations and for construction stormwater management that allowed this pipeline to operate, but in doing so, it did not take into account the huge harms to the global climate and Indigenous rights caused by the project the agency facilitated with permit approvals. Importantly, MPCA issued its stormwater permits before the environmental review for Line 3 was ever complete, a clear violation of existing standards under MEPA. The agency cannot pretend it respects community concerns when it rushes through projects before it is even legal to issue the relevant permits. The agency cannot pretend it respects environmental

justice principles when its permitting decisions are made over the objection of the majority of its environmental justice advisory committee, most of whom resigned from the committee due to MPCA's handling of Line 3.

Not only was this a failure to listen to and address the concerns of thousands of Minnesotans, the agency has also continually failed to properly hold Enbridge accountable for the many harms caused by the construction. The MPCA has failed to study and understand the potential harms from the pipeline's construction. It has been up to community members volunteering their time to document the devastation that Enbridge has caused, and bring it to the agency's attention.

HERC

When the Hennepin Energy Recovery Center (HERC) was first proposed, North Minneapolis residents were strongly opposed. To this day, community members and organizations continue to oppose the HERC and advocate for its closure. North Minneapolis is one of the clearest examples of an environmental justice community in the state. Far from canceling HERC's permit, MPCA allowed the facility to continue to operate for years under an expired "zombie permit" that doesn't protect the community.

PolyMet

When even the state Supreme Court is ruling that the MPCA is not doing their job properly, it is clear that things have gotten far out of hand. The handling of the proposed PolyMet mine is a quintessential example of the agency explicitly siding with industry, going so far as to conceal Environmental Protection Agency (EPA) warnings from the public. This is not how an agency that earns trust operates, and the Minnesota Supreme Court unanimously found that it is illegal to issue a permit on irregular procedures designed to avoid transparency and stifle public knowledge and comments.

This case represents the agency doing worse than the bare minimum, by actively misleading the public to ensure a harmful project gets its permits.

3M and PFAS

While the Minnesota Attorney General ultimately got a settlement from 3M for decades of knowingly dumping toxins in Minnesota communities, hundreds of people have died and thousands have incurred horrible chronic diseases due to exposure to this company's PFAS "forever chemicals." The genie can't be put back in the bottle once a groundwater resource is destroyed by toxic chemicals that cannot be removed or destroyed. Yet it took MPCA decades to do anything about 3M's dumping.

The list goes on, but there is no need to belabor the point. Far more often than not, the MPCA has failed to protect our communities and environment.

This rulemaking presents the MPCA with an opportunity to begin building that trust with the community. The process of building trust takes time, consistency, and accountability. This law

alone will not atone for the decades of corporate pollution and the many harms that have particularly burdened low-income and BIPOC communities. But it can represent a fundamental shift in our regulatory process – and a commitment from agency leadership to begin that longer process of building trust.

The intent of our participation in the rulemaking to implement this cumulative impacts law is to 1. stop additional pollution in environmental justice areas and 2. decrease what is already there. This law was enacted to address the disproportionate environmental impacts set up by past discriminatory practices that are perpetuated by the current environmental protection system. MPCA, you need to be better - this rulemaking process must reflect a commitment on your part to address these historic failures and set up protections to avoid passing on these environmental burdens to future generations.

Need for Better Community Engagement

People care about the air they breathe and the water they drink. They want to know if the local lake is polluted, or their soil is contaminated, or the factory down the road is affecting their lungs. And many overburdened communities already know that something is wrong. The goal of this law is to ensure that people from these communities can learn more about these issues, and begin seeing an actual reduction in the pollution issues they are facing. In order to accomplish this, the MPCA must take a hard look at their current approach to public engagement.

Many people, particularly those from marginalized communities, don't have the time, resources, or energy to fully engage with and learn about these processes. That is why it is important to meet people where they are, and provide ways for them to share their stories, concerns, and feedback. This applies both to this rulemaking process and to the agency's community engagement in general.

One of the most important pillars of public engagement is that it must be a two-way street. Both the agency and community members should come away from the meeting having learned and having been heard. This includes a mix of having spaces where people can engage with the agency, and staff from the agency attending community events and spaces to hear about concerns being brought up.

Another important pillar of community engagement is accountability and transparency. If you are going to ask people for input and feedback, and build relationships with community groups and leaders, you must also show that you are taking that feedback and those relationships seriously. If people feel like they are just speaking into a void, they will lose any reason to engage. Community members deserve to know how and when their comments and concerns are being incorporated.

The work of community engagement is long, and goes beyond just this rulemaking process. Our regulatory process should work for the people and environment, it can't just be the agency

making all the calls themself. **To this end, here are a number of suggestions we have for improving community engagement:**

Hire a full-time organizer: Engaging with community requires building relationships over time and accountability. Having full-time staff who can regularly meet with community orgs and leaders, attend community events across the state, and help connect people with resources and information will be a significant improvement in public engagement.

Engage with a broader range of groups and organizations: The MPCA can't just focus on engaging with environmental nonprofits to hear community perspectives. There are community organizations of all kinds of disciplines and focuses that the MPCA should be building relationships and trust with. This includes a variety of justice groups (racial, economic, housing, LGBTQ, etc.), community/neighborhood groups, parent groups, agriculture/farming groups, faith groups, Indigenous groups, and labor unions.

Contract with local organizations to do door knocking and reach new audiences: Local community organizations have relationships with diverse communities and understand how to communicate with them effectively. Some organizations have professional canvassers who are already well trained in talking to community members and can provide training to others as well. Certain communities are also inherently distrustful of any government representatives trying to talk to them, whereas a local organization has likely built up trust and a local reputation. Providing paper materials using plain, accessible language in English and in communities' preferred languages will also help reach people who may not have time to attend community meetings.

Conduct surveys to receive feedback on specific parts of the rulemaking: This process needs a low barrier of entry. People should be able to engage without having to learn about the entire history and context of the cumulative impacts law. Creating the survey questions should be a collaborative effort by stakeholders, to ensure that questions are phrased in a clear and accessible way.

Be sensitive to the context of this rulemaking: According to the National Environmental Justice Advisory Council (NEJAC) model guidelines, MPCA "should approach communities with empathy. Cultural identity is tied to history and it is critical for agencies to understand this. Agencies should endeavor to understand the existing power relationships between the community and local governments. Agencies should recognize the mutual benefits and mutual learning opportunity to ensure a robust community engagement process that can result in a win-win situation."[1]

Robust public engagement and public participation has long been a stated priority for MPCA. The agency's 2018-2022 Strategic Plan sets a goal to "increase involvement of communities in

[1] *Model Guidelines for Public Participation: An Update to the 1996 NEJAC Model Plan for Public Participation* (Jan. 25, 2013), available at https://www.epa.gov/sites/default/files/2015-02/documents/recommendations-model-guide-pp-2013.pdf

decisions and actions that affect them."[2] We urge MPCA leaders to review and adopt the NEJAC Model Guidelines for Public Participation.[3]

Community engagement is an ongoing process, but the intent of this law centers around communities having a real say in harmful permitting decisions in their area. The public engagement of this rulemaking process must also reflect the values of community education and empowerment in the law itself.

What We Need to See From These Rules

Setting of Benchmarks

The purpose of this law is to provide marginalized communities with more transparency about polluting facilities in their space, and empower overburdened communities to determine if a harmful facility should receive its permits. Moreover, the law and MPCA's analysis of covered communities has identified a limited list of only 123 facilities that require major air pollution permits. These facilities, and any new ones proposed in the future, by definition have major air impacts, and they are located within or next to the communities that the legislature required MPCA to protect. Because of this, the benchmarks for determining when to require a cumulative impacts analysis should be set at zero. **We recommend that every facility with a relevant permit application in or within one mile of an EJ area should conduct a cumulative impacts analysis when seeking a new permit, a permit amendment, or a permit reissuance.**

What is measured is what is counted, and our communities count. This analysis is an important tool for understanding the true burdens of pollution in our communities, and should not be limited to just a subset of the worst polluters. Setting benchmarks and determining whether or not facilities meet or exceed those benchmarks would be as burdensome and time-intensive as conducting the analysis itself. Including all covered facilities ensures that our communities will have significantly more information about possibly harmful facilities in their area.

Cumulative Impacts Analysis & Substantial Adverse Impact

In regards to the cumulative impacts analysis and defining substantial adverse impact, we believe that the New Jersey rules provide us with a clear, simple, and objective process which we recommend adopting. This would involve creating a list of environmental, social, and public health stressors based on publicly available data and using a geographic comparison to determine if granting a permit is making a community more overburdened than comparable communities.

The Minnesota cumulative impacts law already clarifies that the agency must "provide sources of public information that an applicant can access regarding environmental stressors that are

[2] https://www.pca.state.mn.us/sites/default/files/p-gen1-21.pdf
[3] https://www.epa.gov/sites/default/files/2015-02/documents/recommendations-model-guide-pp-2013.pdf

present in an environmental justice area". This opens the door to a cumulative impacts analysis similar to New Jersey's approach, which inspired the Minnesota law in the first place. Not only is this sort of analysis much easier for permit applicants, it also provides an objective, data driven definition of substantial adverse impact, which would help avoid litigation on permit decisions.

This analysis must also be easily understood by the general public. Community members should be able to read a summarized version of an analysis and understand how a proposed facility may impact their health and community. The analysis must be presented in plain and accessible language in English and in preferred languages spoken by residents of that community Spanish, Somali, Hmong, Ojibwe, Dakota etc.

A cumulative impacts/environmental justice mapping tool is easily within the reach of the MPCA to set up the data requirements for most of a cumulative impact analysis. The state of Minnesota has strong and publically available data resources including the Minnesota Department of Health Public Health portal, a state specific cumulative air toxics model, What's in my Neighborhood, and other excellent tools that could be utilized for implementation of this law. Furthermore, there are several national tools that provide data resources, including the EPA EJ Screen and the CDC Environmental Justice Index. Several states (NJ, MI, CA, MD, etc.) have published environmental justice/cumulative impacts mapping tools to provide and/or aggregate environmental, social, and public health stressors. Some states are using the results from these tools as data for inclusion in environmental justice or cumulative impacts analyses. Other states are using them in the permitting decision itself.

We recommend that MPCA finalize and publish a cumulative impacts/environmental justice mapping tool with a set of environmental, social, and public health stressors that are relevant to the state of Minnesota. These stressors should be determined based on a public process during this rulemaking. Minnesota is a data rich state, and has a very environmentally educated public. This is not a heavy lift and will be a useful tool even beyond this law.

Additionally, we recommend that the results from this mapping tool be used in permitting decisions in a manner similar to that devised through rulemaking in New Jersey. During their cumulative impacts rulemaking, New Jersey chose 26 stressors in a public process. When permits enter the New Jersey permitting process, an analysis is conducted such that each of the 26 stressors are compared between the geographic area where the permitted facility is and another geography (e.g. census tract average or county average, whichever is lower). Each of the stressors that are higher in the facility area are pulled into the cumulative impact analysis. The facility then completes an analysis to determine if the proposed emissions will add to the stressors that are higher. If the permit is found to contribute to stressors that are already higher, the permit must be denied or conditioned through emission and operational limits to prevent additional burden. In this way, there are no additions to stressors that are higher near permitted facilities, and for existing permits they must be denied or conditioned such that pollution is lowered in EJ areas. **In the case of Minnesota, this**

would mean defining substantial adverse impact as "a permit that is found to contribute to stressors that are already higher than a comparative geography".

This system avoids the current reductionist risk-based decision-making that the agency undertakes, as it is always more health protective to eliminate hazards than to reduce risk. Making decisions based on "an acceptable level of risk" has not protected people and cannot be used as a benchmark. In our proposed process, "substantial adverse" is defined as a facility that contributes to a group of stressors that are already higher than geographic comparisons. Many EJ areas already have air pollution scores (as per the MPCA Environmental Justice Story Map) that are above a hazard of 1 or a cancer risk of 1 in 100,000, which should already be considered "substantial adverse". One example set forward by environmental justice communities is that parents of toddlers put a gate at the top of stairs (hazard based approach) rather than pillows at the bottom of stairs (risk based approach). We need a protective rule that reduces cumulative hazards in environmental justice areas and stops any additions. Any inaction on the part of the MPCA perpetuates existing harms.

Community Benefit Agreement

While the law dictates that a community benefit agreement must be between the commissioner and the facility owner or operator, the rulemaking gives room for the MPCA to " establish the content of a community benefit agreement and procedures for entering into community benefit agreements". The procedure for entering into a community benefit agreement must be centered around community leadership. **We recommend that the agreement be ratified by the impacted community before being signed by the MPCA.**

Furthermore, if the facility owner or operator is not properly fulfilling their side of the agreement, the rules must allow for the community to challenge the existing agreement, including a review by an impartial arbiter such as an Administrative Law Judge.

Finally, we encourage the MPCA to consider certain aspects of community benefit agreements such as pollution mitigation, local hiring, noise control, local investments into public goods, and job training. We also do not believe that offsets should be considered as part of these agreements. Companies often use offsets as an excuse to continue polluting communities, while said offsets are doing nothing to lower the impact on the community. While each community benefit agreement will look different, we believe these factors should be taken into consideration. We also encourage the MPCA to engage with a variety of stakeholders, including labor unions, in determining what the contents of community benefit agreements will be.

Conclusion

This rulemaking process presents the agency with challenges, but also opportunity. Regardless of the rules written, this law must represent a fundamental shift in community outreach and engagement. The agency has a chance to begin building relationships with community groups and leaders, and become a truly protective force for our communities. Relationship building and

trust take time, but are essential if we are ever going to truly shift the regulatory framework in Minnesota.

We hope you take our words to heart, and we look forward to continued engagement in this process.

Signed,
The Frontline Communities Protection Coalition

Comunidades Organizando el Poder y La Acción Latina (COPAL)
Minnesota Environmental Justice Table (MNEJT)
Climate Generation
Clean Water Action Minnesota
Minnesota Center for Environmental Advocacy
CURE
TakeAction Minnesota
Minnesota Environmental Partnership (MEP)
Recycling Electronics for Climate Action (RECA)
Health Professionals for a Healthy Climate (HPHC)
Sierra Club North Star Chapter

RECEIVED
By: OAH on 10/6/2023 at 3:22pm
GA Bonneville Attachment

Ms. Severson:

Because I was unable to see how to comment on your OAH web site even after having signed up for an “account,” I called the number given on the site. The person there told me to send my comments to you regarding public comment on the legislature’s recently passed proposed Cumulative Impact (MPCA) program/process. Today at 4:30 p.m. is the listed deadline, but I understand you are not in the office today. Thus, I am cc’ing my state senator, Kari Dziedzic, on this email as well. Below are my comments:

_____

I am a resident of Minneapolis who lives in a historically overly impacted area of the city when it comes pollution concerns. Numerous polluted sites and a large state Superfund site are near my house and in this community. I was thrilled to hear that the legislature was finally making progress towards recognizing the principle of “cumulative impact” for pollution, stretching the protections beyond just a portion of south Minneapolis.

I attend one of the MPCA’s virtual public meetings on this new legislation. A number of thoughts came to mind.

1. Using the factors of “death and hospitalization,” as the MPCA does, seems to be an outdated, outmoded method of focusing on the negative impacts of pollution and polluting sites. This compromises true environmental justice, not to mention public health. And the category of “asthma” is also limited in scope when it comes to the health effects resulting from pollution. Our health care system today now aims to limit who gets into a hospital in favor of “day surgeries,” clinic visits, etc. Too many never get to receive health care at all, due to costs and other factors. And tabulating “asthma" is a haphazard method, since many more

people have it than would be reported. MPCA needs to devise a modernized system of looking at health impact, but I am glad to see the map/formula seems to include “adjacent” environmental justice areas. Please do not diminish which geographic areas are proposed to be included in this new, expanded look at cumulative impacts and adjacent areas.

2. Please include not only air, but other polluting factors when analyzing these situations: ground water pollution, soil contamination, noise pollution, historical pollution, “remediated" sites that still hold pollution, etc. Pollution needs to be looked at as a whole, especially when reviewing “cumulative impacts."

3. Do not let certain players off the hook, such as railroads and government projects. All should be subject to these cumulative impact rules.

4. Keep in mind that pollution doesn’t know one race from another, or one family’s income from another. Pollution is pollution, and all should be entitled to environmental justice.

5. I would like to see the new rules expanded beyond just new applicants for permits. Mechanism for reviewing existing permits and existing polluters needs to be included.

6. More transparency is desperately needed from the MPCA on how any new cumulative impact process/notification will work, once the new rules are in place. Currently, MPCA does a sub-par job on community engagement, an up-to-date web site, overly complicated methods of submitting public comments like these, and contact methods that work for all — by phone, mail, email, web, etc. For instance, over a couple of decades of working with the MPCA on a massive polluted site near my home, my fellow community members and I have been appalled at how hard it is to figure out who to contact at the MPCA and to decipher what is

going on. Even today, looking at the MPCA web site, I found no phone at all, just an emergency spill number. Also in our experience, the person charged with MPCA community engagement has failed to engage at all with the community, notably in late 2019 regarding permits that were handed out by the state, rubber-stamped essentially, without any public notice whatsoever. This needs to change. MPCA may be most accustomed to dealing with paid staff, lobbyists and corporate lawyers. The public, I can assure you, has a difficult time figuring out how to engage with the MPCA — most shockingly, I see, in this rule making process before us today. I am a recently retired professional, well versed in using the internet, but I was truly stumped by the obtuse system that is set up for public comment on these cumulative impact rules. We are tired of having to work this hard to get you to listen to us.

7. MPCA needs to come up with an easier, more inclusive system of notifications, in PLAIN English, aimed at the GENERAL public, not just professionals who work on this subject matter daily or groups who have paid staffers. A better communications plan is needed. I suggest a task force of volunteers residents like myself who have tried to deal with the MPCA over the years be formed to refine how to get the word out on this very important topic of cumulative impacts and the new changes being contemplate. This is a major milestone for those of us living around pollution, and it seems to be barely a blip on the radar of elected officials, government entities, media and thus the general public - whose health and well being depends on this.

8. Once the program/process is defined and eventually in place, in-person and virtual community meetings are essential to this review process.

9. Better definition of which circumstances will blink on this new cumulative impact review process is needed for the public. I

would hope any new construction, new permit, renewed permit would be subject to cumulative impact review. That needs to include any construction or land use changes by players who think they are preempted from building permit-type city ordinances/planning department review or local regulation, such as railroads. Don’t let major polluters continue to slip through the cracks!

10. These new rules re: cumulative impact should pertain to all state and local agencies/jurisdictions, not just MPCA projects.

RECEIVED
By: OAH on 10/6/2023 at 3:25pm
Margaret Levin Attachment 1

SIERRA CLUB
NORTH STAR CHAPTER

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William Moore
Office of Administrative Hearings
600 North Robert Street
PO Box 64620 St. Paul, MN 55164

Kate Izzo
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155-4194

Submitted via OAH Rulemaking eComments website

October 6, 2023

Re: Planned rules governing Cumulative Impacts analysis for permit decisions in environmental justice areas

Mr. Moore and Ms. Rizzo,

The Sierra Club North Star Chapter represents over 50,000 members and supporters in Minnesota working to help our state's communities flourish through environmental protection.

We are sharing the attached spreadsheet with public comments collected from Sierra Club supporters urging meaningful public engagement, transparency, and centering of anti-racism and environmental justice in both the upcoming rulemaking process and in the rules themselves.

Please let us know if you need additional contact for the individuals submitting these comments.

The final rules must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This intent will only be achieved by listening to the voices and expertise of impacted communities.

The Sierra Club is a partner organization in the Frontline Communities Protection Coalition. The coalition's comment letter further elaborates on our position and recommendations for this rule making process.

Sincerely,

Margaret Levin, State Director
Sierra Club North Star Chapter

RECEIVED
By: OAH on 10/6/2023 at 3:53pm
John Cunningham Attachment

John Cunningham, Executive Director
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Tim Worke, Chief Executive Officer
Associated General Contractors of Minnesota
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Matt Zeller, Executive Director
Concrete Paving Association of Minnesota
3596 Linden Ave., Suite B5, White Bear Lake, MN 55110

John Pollard, Legislative Director
International Union of Operating Engineers Local 49
2829 Anthony Lane South, Minneapolis, MN 55418

Abbey Bryduck, Executive Director
Minnesota Asphalt Pavement Association
1600 Utica Ave. South, 9th Floor, St Louis Park, MN 55416

October 6, 2023

Katie Izzo SUBMITTED ELECTRONICALLY
Rule Coordinator
Minnesota Pollution Control Agency
520 Lafayette Road North, St. Paul, MN 55155-4194;

Dear Ms. Izzo:

Thank you for the opportunity to comment on the "Planned New Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas, Minnesota Rules, chapter 7001" ("New Cumulative Impacts Rule"). We are writing on behalf of the members of the Aggregate & Ready Mix Association of Minnesota (ARM), the Associated General Contractors (AGC) of Minnesota, the Concrete Paving Association of Minnesota (CPAM), the International Union of Operating Engineers (IUOE) Local 49, and the Minnesota Asphalt Pavement Association (MAPA). Our members are involved in construction activities including the mining and production of aggregate materials, asphalt, and ready-mix concrete, The construction materials produced by our members are integral to statewide capabilities for infrastructure maintenance, affordable housing, and sustainable development. We represent workers and companies across Minnesota, including the seven-county metropolitan area, Duluth and Rochester where the New Cumulative Impacts Rule will apply.

Our organizations' missions include providing our members with technical and environmental education and representing them in state legislative and agency activities. Our organizations have worked closely with the MPCA and other state agencies for a very long time. This has allowed us to ensure that our members understand important environmental standards that are planned and those standards that have been implemented to protect human health and the environment, which our members ultimately integrate into the design, construction and operation of their facilities. For example, we and the public benefit from the MPCA's publication of a guidance document providing a comprehensive summary of "environmental rules for aggregate mining" (https://www.pca.state.mn.us/sites/default/files/wq-wwprm3-01.pdf), creation of an air emission general permit for nonmetallic mineral processing and creation of the "Nonmetallic Mining/Associated Activities General Permit -- National Pollutant Discharge Elimination System/State Disposal System."

Our members support the goal of the legislature and MPCA in this rulemaking to ensure that the health of Minnesota citizens is protected. Our industries are well understood and thoroughly regulated by the MPCA and other agencies through permits, reporting and existing regulations. The public can be assured that existing MPCA oversight, and associated regulations, mean that our members' facilities are constructed, modified and operated in a manner that ensures protection of human health and the environment. As the MPCA proceeds with this rulemaking, we look forward to discussing with the MPCA, and others as needed, the thoroughness of the regulatory system that currently applies to our operations.

As the MPCA considers factors to include in a cumulative impacts analysis, we respectfully request that the MPCA's analysis incorporates the integral positive impact our industry currently has on society's ability to meet the high priority goals of strengthening our nation's infrastructure and increasing the use of clean construction materials. Just last week, the Biden-Harris Administration noted that "billions of tons of concrete, asphalt, steel, glass, and other construction materials and products are required to build, maintain, and operate our country's buildings and infrastructure" and announced a $100 million grant program to support clean construction materials in an effort to address the global greenhouse gas emissions from construction materials and products.[1]

The 2023 Legislature has put that same priority for clean construction materials into Minnesota law by adopting new statutory language in Minnesota Statutes Chapter 16B. That new law includes creating an "Environmental Standards Procurement Task Force" to address environmental standards for construction materials, creating a grant program to assist manufacturers to obtain environmental product declarations for their construction products (included concrete and asphalt) and requiring that the state establish "maximum acceptable global warming potential" for several construction products, including many products our

[1] https://www.epa.gov/newsreleases/biden-harris-administration-announces-100-million-grants-support-manufacturers-cleaner#:~:text=WASHINGTON%20%E2%80%93%20Today%2C%20the%20U.S.%20Environmental,annual%20global%20greenhouse%20gas%20emissions.

members produce. That new law requires that the Department of Administration and the Department of Transportation incorporate the results of that work into state project bidding processes.

Recognizing those important federal and state goals, MPCA must avoid actions that have the real potential to drive aggregate, asphalt, and ready-mix production outside the seven-county metropolitan area, Rochester and Duluth. The result, will be increased greenhouse gas emission impacts, increased costs of critical construction materials and increased truck traffic on area roadways resulting in increased cost of repair and replacement.

When designing a process for cumulative impact analysis, the MPCA must recognize the societal benefit of minimizing the global warming potential of mining aggregate and producing ready-mix and asphalt products. Aggregate resources are in limited, fixed locations and the MPCA must avoid unnecessarily interfering with aggregate production at locations close to where aggregate products are used. MPCA should also value production of asphalt and ready-mix products close to the location of their use. MPCA should encourage reduction of vehicle miles traveled for those construction products (often on already congested routes) by prioritizing aggregate, asphalt, and ready-mix products production at locations closest to their use. In contrast, state policies that drive those construction materials facilities to distant locations are contrary to federal and state carbon reduction goals.

Any MPCA action that forces aggregate, asphalt, and ready-mix product production outside metropolitan areas will also have a negative impact on budgets for major public and private projects. This will reduce the buying power of public agencies charged with building and maintaining infrastructure, funding affordable housing, and building schools, hospitals and other important projects. We are already approaching a crisis in availability of construction quality aggregates within the metropolitan area. The cumulative impacts of further limiting the availability of construction materials would be felt directly by the communities that MPCA's cumulative impacts rule is intended to protect.

Thank you for your consideration of our comments as you define the scope of the New Cumulative Impacts Rule. We look forward to continuing to work with the MPCA and others as the rulemaking process proceeds.

Respectfully submitted by,

John C. Cunningham, Executive Director
Aggregate and Ready Mix Association of Minnesota

Tim Worke, Chief Executive Officer
Associate General Contractors of Minnesota

Matt Zeller, Executive Director
Concrete Paving Association of Minnesota

John Pollard, Legislative Director
International Union of Operating Engineers Local 49

Abbey Bryduck, Executive Director
Minnesota Asphalt Pavement Association

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By: OAH on 10/6/2023 at 3:56pm
Olivia DawsonOlson Attachment

Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401

October 6, 2023

Minnesota Office of Administrative Hearings (OAH)
Minnesota Pollution Control Agency (MPCA)
Request for Comments on Cumulative Impacts Rulemaking
Revisor's ID Number R-04805
OAH Docket No. 21-9003-39398
Electronic Submission

Re: Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas

Dear MPCA:

Northern States Power Company – Minnesota ("Xcel Energy" or the "Company") appreciates this opportunity to provide comment on the MPCA's Cumulative Impacts Rulemaking. Xcel Energy adopted an Environmental Justice Position Statement[1] (EJ Position Statement) in 2022. We are committed to considering environmental justice in our energy, climate, and environmental initiatives and strive to provide meaningful opportunities for impacted communities to participate in the process. Our EJ Position Statement also outlines related Company objectives including collaboratively engaging the communities we serve, maintaining energy affordability and reliability, and allocating the costs and benefits of the clean energy transition equitably.

Accordingly, we support equity and environmental justice efforts and recognize the importance of the new cumulative impacts analysis requirements directed by Minnesota Session Law 2023. This will be a first of its kind effort in the state, and a leading effort nationally. Given the monumental nature of this rulemaking, we appreciate MPCA's efforts to gather information and stakeholder input prior to drafting proposed rules. We look forward to working with MPCA and other stakeholders to create new processes that increase environmental justice efforts.

MPCA has a significant undertaking before it in establishing rules for cumulative impacts analysis in permitting before this has been undertaken at the federal level or in most other states. EPA is amid a 5-year research program to strengthen and advance the scientific foundation for assessing cumulative impacts, exposures, and risks to better serve historically marginalized communities and has identified related research needs, gaps, and barriers[2]. We understand that the MPCA's process will extend through fiscal year 2026, however MPCA should consider any guidance from EPA as it becomes available. We urge careful consideration of available resources and the current state of necessary scientific analysis, guidance, and tools when establishing these rules. Given many important details are yet to be worked out, we strongly encourage MPCA to create a robust, open, and transparent stakeholder process for the three-year rule

[1] Environmental-Justice-Position-Statement.pdf (xcelenergy.com)
[2] Cumulative Impacts Research | US EPA

drafting process. This will position the state for success by reducing the number of comments on the draft rules. We urge MPCA to create a workable process which achieves legislative directives and balances the need for an expedient permitting process for economic development purposes.

Based on our experience, as outlined below, in our view a workable process would include:

- Benchmarks and definitions for determining which actions will require analysis that lead to meaningful outcomes. Cumulative impacts analysis requirements should focus on EJ areas that are already experiencing disproportionate impacts and permit actions surpassing significant emissions thresholds.
- Data tool(s) to support consistent analysis across the state that enables understanding of which EJ Areas are disproportionately, cumulatively impacted based on indicators. Tools should enable inclusion of socioeconomic considerations in decision making processes.
- A guidance framework for enhanced engagement efforts to identify and reach diverse and representative community members to provide meaningful opportunities to participate, establish relationships, and allow them to define what they view as benefits for their community.

We have already begun to advance environmental justice within the Company. In 2022, The Company convened an Equity Stakeholder Advisory Group (ESAG) based on Orders from the Public Utilities Commission in our Integrated Resource Planning docket. ESAG is composed of representatives of community-based organizations, advocates for low-income households, environmental justice groups, clean energy advocates, and state agencies. It has met approximately monthly (10 times thus far) to work collaboratively on issues of energy affordability, equitable access to energy efficiency and renewable energy programs, and workforce diversification. Under the same Commission order, we will be establishing an Environmental Justice Accountability Board which will, among other responsibilities, inform the Company's approach to environmental justice issues going forward.

Xcel Energy also has experience with the approach Colorado has taken in implementing the 2021 Environmental Justice Act, which directed consideration of cumulatively impacted communities in permitting. In implementing the Act, the Colorado Air Quality Control Commission mandated use of the Colorado EnviroScreen tool[3] that identifies disproportionally impacted communities, and a subset of cumulatively impacted communities, which informs a variety of programs including air permitting. EnviroScreen provides a comparative measure of cumulative environmental burden, using environmental, health, and sociodemographic indicator data to calculate scores which identify areas that are more likely to be affected by current and past environmental inequities. A draft report issued July 30, 2023 by the EPA Science Advisory Board[4] indicates half a dozen states (California, Maryland, Michigan, Colorado, New Jersey and Washington) have created EJ screening tools with cumulative impact scores and EPA is considering taking a similar approach in future iterations of EJScreen. We recommend MPCA review the Colorado example and establish a similar tool to provide a consistent data set for screening and to support analysis. Permit applicants could then use data tools provided by MPCA to understand how different EJ

[3] teeo-cdphe.shinyapps.io/COEnviroScreen_English/

[4] DRAFT Science Advisory Board report - Review of the Updated Methodology of EPA's Environmental Justice Screen (EJScreen) Mapping and Screening Tool (version 2.1) dated July 30, 2023

Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401

Areas may be currently experiencing cumulative impacts to inform analysis of how the project would increase or decrease these impacts. Impact indicators should include air, water, and land pollution as directed by the definition of cumulative impacts as well as socioeconomic considerations to inform permit decision-making.

Additionally, Xcel Energy has experience with implementation of the federal government's Justice 40 Initiative requiring applicants for Infrastructure Law funding to include Community Benefit Plans (CBP)[5]. Xcel Energy has submitted grant applications to DOE for hydrogen hub, energy storage, and grid resiliency programs that, if approved, would provide funding to Minnesota. Each application included a CBP discussing how the Company plans to engage impacted communities, create, and retain high-quality jobs, incorporate Diversity, Equity, and Inclusion into projects, and contribute to the Justice40 goal for 40% of investment benefits to be directed to disadvantaged communities. We recommend MPCA review and consider leveraging the federal example when creating community benefit agreements. The process should consider key environmental, economic, and social metrics and aim to provide benefits that, in aggregate, neutralize any adverse impacts from a proposed project. This is a somewhat subjective process where the community will need to provide input.

The permittee will need to take a leading role in engagement with the community. Based on our experience in similar efforts, MPCA should also anticipate that many different groups from within and outside Environmental Justice Areas will claim to speak for those communities. In creating Community Benefit Agreements, it will be important to ensure MPCA and permit applicants are hearing from, and giving weight to, the perspectives of community members and organizations with deep and long-term roots in the potentially impacted Environmental Justice Area(s), who may not be the same as those who typically engage in state agency rulemaking processes.

Again, we thank you for this opportunity to provide input. We look forward to continuing to work with MPCA and other stakeholders to advance this important rulemaking. We understand the Chamber of Commerce has submitted a comment letter to MPCA as well. We generally support several of the technical considerations and suggestions provided.

Sincerely,
/s/ *Rick Rosvold*
Rick Rosvold
Xcel Energy
Director, Environmental Services
414 Nicollet Mall, Minneapolis MN, 55401
richard.a.rosvold@xcelenergy.com

[5] About Community Benefits Plans | Department of Energy

RECEIVED
By: OAH on 10/6/2023 at 3:58pm
Kevin Pranis Attachment

BUILDING TRADES
AFL-CIO
MINNESOTA STATE BUILDING & CONSTRUCTION TRADES COUNCIL

Minnesota Office of Administrative Hearings
600 North Robert Street
P.O. Box 64620
St. Paul, MN 55164-0620

October 6, 2023

Attn: William Moore,

Re: Comments of the Minnesota Building and Construction Trades Council on MPCA's Planned Cumulative Impact Rules (Revisor's ID Number R04805)

Mr. Moore:

The Minnesota Building and Construction Trades Council appreciates the opportunity to submit comments and feedback on the July 12, 2023, request for comments (RFC) issued by the Minnesota Pollution Control Agency (MPCA) regarding the agency's Planned New Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas, Minnesota Rules, chapter 7001 (Revisor's ID Number R04805) (the "Planned Rules").

The Council and its affiliated unions represent more than 70,000 construction professionals affiliated with 15 international unions. Our members, their families and communities will be directly affected by the current rulemaking in a number of ways. On one hand, many of our members make their living building, maintaining, and/or operating new and existing facilities that would be covered by the rule. For example, the list of 123 facilities that hold or are in the process of acquiring covered permits encompasses dozens that were built and are maintained by our members, including some of the largest Building Trades worksites in Minnesota.

On the other hand, Building Trades unions represent what could be tens of thousands of members that live in or adjacent to designated Environmental Justice Areas, which largely consist of working-class communities where lack of family-supporting jobs represents a significant socioeconomic burden. For Building Trades households in these communities, union construction employment represents a lifeline.

The Council and its affiliated unions support efforts to advance environmental justice, and to ensure that all Minnesotans have access to economic opportunity and a healthy environment. Every day, thousands of union tradesmen and tradeswomen go to work on projects that make our communities cleaner and healthier—from environmental remediation to construction of clinics, schools, and water infrastructure.

We believe that the current rulemaking provides an opportunity to begin addressing the challenges faced by residents of communities of color, native, immigrant and/or low-income communities that are also burdened by elevated levels of air pollution and associated health consequences. We also believe it is possible to address these challenges without significantly increasing

regulatory barriers and burdens that have the potential to jeopardize needed economic development and the state's ability to capitalize on historic Federal investments in infrastructure and manufacturing through the Infrastructure Investment and Jobs Act, Inflation Reduction Act, and CHIPS and Science Act, as long as the rules are properly scoped.

Our comments below are divided into two sections. In Section I, we have included comments on the seven specific areas of MPCA rulemaking mandated by the statute, in Minn. Stat. § 116.065, Subd. 6(c). Then in Section II, we have included several comments of a more general nature. We hope these comments will be helpful to MPCA as you begin this important rulemaking process.

I. Comments on the Seven Areas of Rulemaking Mandated by Minn. Stat. § 116.065, Subd. 6(c)

Subdivision 6(c) of the statute requires MPCA to implement the statute by promulgating rules addressing seven topics. We offer for MPCA's consideration the following comments on the specific rulemaking topics:

1. Establish benchmarks to assist the Commissioner's determination regarding the need for a cumulative impacts analysis.

We urge MPCA to draft the benchmarks narrowly, triggering a mandatory cumulative impacts analysis (CIA) only in discreet, well-defined situations where it is very likely the permit action at issue would have a substantial adverse impact on the environment or health of the environmental justice area (EJA) and its residents. Importantly, the statute provides several other mechanisms, other than the benchmarks, by which a CIA may be required, e.g., the petition process or a discretionary CIA. As a result, broad categories of benchmarks are not necessary to achieve the goals of the statute. Rather, the benchmarks should be reserved for those limited situations when it is almost certain that the impacts of a permit action will have a significant adverse impact. By way of analogy, the types of projects triggering a mandatory CIA under the benchmarks should be similar in significance to the mandatory EIS categories under MEPA, not the broader mandatory EAW categories. *See* Minn. R. 4410.4300 and .4400.

We also recommend that MPCA should approach the benchmarks differently for three different categories of permit actions: reissued permits, modified permits, and newly issued permits. The statute asks MPCA to determine whether a permit action may impact "the environment or health of the residents" of an EJA. This language implies that MPCA must look at any impacts to an EJA's *current* "environment or health" at the time the permit action is requested and use that as the baseline for evaluating the action's impacts. In the case of a reissued or modified permit, any impacts from the permitted facility prior to the reissuance/modification are part of the baseline conditions. Had legislators intended to judge the impacts of a proposed permit action based on some past level of impacts, they could have indicated this expressly. Accordingly, for all three categories of permit actions, the thresholds should be based only on the incremental effects attributable to a permit action, as follows:

- *Permit Reissuances*: In the case of a permit reissuance, any threshold should only be based upon any net increases in emissions, based on the reissuance application; if there are no substantial changes in emissions since the prior permit, the permit action should be categorically exempt from preparing a CIA. This approach is similar to MPCA's evaluation of antidegradation for reissued NPDES permits. Under Minn. R. 7050.0280, subp. 1, an

antidegradation evaluation is only required for reissued NPDES permits that MPCA anticipates will result in "net increases in loading"; if there is no change in permit loading, no antidegradation evaluation is required. MPCA similarly should expressly exempt from the CIA requirement reissued air permit actions that will not result in a net increase of air emissions when compared to the existing permit.

- *Permit Modifications*: For modified permits, the CIA decision process, including the benchmarks, should be based only on the incremental effects attributable to the modification, evaluated against the condition of the environment or health of the residents of an EJA at the time the permit modification is proposed.

- *New Permits*: Only for newly issued permits should the thresholds be based upon the effects of the project as a whole. Such effects should be evaluated against the condition of the environment or health of the residents of an EJA at the time the new permit is proposed.

2. Establish the required content of a cumulative impacts analysis and provide sources of public information that an applicant can access regarding environmental stressors present in an EJ area.

Rules promulgated pursuant to this section of the statute should require MPCA to maintain databases of public information that are generally sufficient for completing a CIA and can reasonably be relied upon by regulated parties subject to the statute. However, the rules should allow a permittee to reference additional reasonably reliable data outside of MPCA's database as needed.

3. Define conditions, criteria, or circumstances that establish an environmental or health impact as a substantial adverse impact.

The scope of "environmental or health impact" for purposes of MPCA's rulemaking should be limited to impacts related to air pollution. The statute only applies to applications for air permits, and MPCA's authority to condition air permits to "protect public health and the environment" under subdivision 5(c) of the statute is inherently limited by the air-focused scope of the underlying statutes and regulations. Broader "environmental" resources, such as quietude, historic sites, and aesthetics are addressed by other regulatory programs, including but not limited to the Minnesota Environmental Policy Act (MEPA), which already will be applicable for many large permit actions (for example, see the definition of "environment" in rules implementing the statute, which includes "land, air, water, minerals, flora, fauna, ambient noise, energy resources, and artifacts or natural features of historic, geologic, or aesthetic significance." Minn. R. 4410.0200, subp. 23).

We also recommend that MPCA consider a multi-factor approach to determining a substantial adverse impact, similar to the approach used under MEPA for a responsible governmental unit to determine whether a proposed project has "the potential for significant environmental effects" such that an EIS is required. Minn. R. 4410.1700, subp. 7. Some of the factors for determining "substantial adverse effect" could be based upon factors in part 4410.1700, including, for example:

- The type, extent, and reversibility of a project's anticipated impacts;

- The extent to which the anticipated impacts can be anticipated and controlled as a result of other available studies undertaken by other permittees, or the project proposer, including other cumulative impacts analyses; and

- The extent to which the anticipated impacts are subject to mitigation by ongoing public regulatory authority, including MPCA through its air permitting program.

Other factors for determining "substantial adverse effect" would be more specific to the cumulative-impacts context, e.g.:

- The "net impacts" of the permit action, factoring in both the positive and negative environmental and socioeconomic impacts to the EJA;
- The adverse socioeconomic impacts if the permit is not issued; and
- The likelihood of reductions in air pollution over time that could change baseline levels, e.g., plant retirements, transition away from fossil fuels, etc.

4. Establish the content of a community benefit agreement and procedures for entering into community benefit agreements, which must include: i) active outreach to residents of the affected EJ area designed to achieve significant community participation; ii) considerations other than or in addition to economic considerations, but with priority given to considerations that directly impact the residents of the EJ area; and iii) at least one public meeting held within the affected EJ area.

The Planned Rules should only require a community benefit agreement (CBA) in cases where MPCA determines through a cumulative impacts review that issuance of the permit is likely to result in substantial adverse "net" impacts to local communities after factoring in all environmental and socioeconomic benefits and proposed mitigation measures. It would run counter to the goal of the statute to make small gains in one aspect of EJ (e.g., slightly lower emissions) by incurring larger losses in a different aspect of EJ (significant loss of jobs). MPCA thus should consider potential benefits and mitigation measures when determining whether cumulative impacts review is necessary, and, where cumulative impacts review is ordered, whether issuance of the permit will have substantial negative net impacts to local EJ communities.

5. Establish a petition process and form to be submitted to the agency by EJ area residents to support the need for a cumulative impact analysis.

We recommend that MPCA's rules establishing the petition process and form draw on aspects of MEPA's EAW petition process in Minn. R. 4410.1100. For example, to reduce the possibility of frivolous petitions, the rules should include the requirement from part 4410.1100(2) that any petition must not only be supported by "material evidence," the purported "material evidence" must actually accompany the petition, not be simply referenced.

In addition, petition-process rules should provide MPCA guidelines for evaluating petitions. For example, the rules could incorporate by reference the list of "substantial adverse impact" factors proposed in item 3, above. This again would be consistent with MEPA's petition process, which directs MPCA to take into account the MEPA EIS-decision factors in Minn. R. 4410.1700 when deciding upon EAW petitions. *See* Minn. R. 4410.1100, subp. 6.

6. Establish a process through consultation as defined in MN Statute 10.65 by which a Tribal government can elect to apply this section to a permit application.

We have no comment on this area of mandated rulemaking.

7. Establish methods for holding public meetings and handling public comments.

Rules adopted to implement this part of the statute should avoid requiring an overly formal public meeting and instead let the permittee tailor the meeting to suit the project and community, while adhering to the existing and detailed procedural requirements established by subdivision 4 of the statute. In addition, the rules should specify that the permittee may include a response to any comments received when providing the electronic copy of all written comments and a transcript of all oral comments to the agency under subdivision 4(e) of the statute. Finally, the rules should specify that MPCA must give greater weight to the comments of democratically elected units of governments that represent the communities in question.

II. Additional Comments on the Planned Rules

In addition to our comments above on the seven specific rulemaking topics, we offer the following comments for MPCA's consideration:

1. The definition of "environmental justice area" is based on the "most recent" census data published by the United States Census Bureau. The Council recommends MPCA consider establishing in the rules a process to avoid foreseeable problems that may arise if the census changes the borders of an EJA or creates a new one. For example, MPCA could add procedural clarity by specifying that if a census change creates a new EJA after a project proposer has submitted a complete application for a permit action, the cumulative-impact statute and rules do not apply.

2. The Council anticipates that the statute may result in project proposers designing new or modified projects to address environmental-justice concerns and avoid triggering a CIA. If so, this would further the goals of the statute and should be encouraged by MPCA. MPCA should consider whether the rules could include a process by which a permittee can obtain initial feedback from the agency on environmental-justice aspects of the project, allowing the permittee the option of revising the project design to avoid triggering a CIA in a manner similar to the process of obtaining a synthetic minor air permit to avoid certain federal Clean Air Act requirements.

3. Consideration of socioeconomic impacts of review and permit decisions should include all residents of EJAs whose jobs or livelihoods are directly affected by the decisions, including workers that commute to the facility from another EJA. For example, a worker from an EJA community in St. Paul who commutes to work at a facility in Minneapolis for a job that provides income, health care and retirement security for the worker and her family is as deserving of protection as a coworker who lives down the street from the facility. Workers do not always get to choose where they work, and while most would rather work nearby, in practice they often follow the work. Workers in a given EJA are affected not only by the availability of family-supporting jobs in their neighborhood but also in the availability of family-supporting jobs across the Metro Area and sometimes beyond. Limiting consideration to socioeconomic impacts of workers or potential workers who live in the same census tract as a facility would have the

perverse impact of excluding and effectively punishing residents of EJAs across the Metro who would lose opportunities and potentially health care.

4. In developing the Planned Rules, MPCA should consider the possibility that, and seek to avoid circumstances where, imposition of a burdensome review process or denial of a permit application results in the displacement or even exacerbation of impacts to communities that are facing environmental justice concerns but are outside the scope of the cumulative impacts statute. For example, MPCA should consider the likelihood that cumulative impacts review and permitting decisions will result in the relocation of facilities from communities within the jurisdiction of the new statute to others that face similar burdens but do not have the new statute's protections.

5. MPCA's rules on evaluating cumulative impacts should be limited to consideration of emissions impacts that correlate to the location of emissions and exclude impacts that are not affected by the location of the emitter (e.g., greenhouse gasses (GHGs)). The purpose of cumulative impacts legislation was to identify and prevent environmental racism, defined as the disproportionate exposure of vulnerable communities to pollution due to the siting of pollution industries in proximity to EJ communities. Inasmuch as the impact of GHGs on the planet are not tied to the location of the emissions, there is no benefit to locating GHG emissions further from EJ communities.

6. Finally, we emphasize that if MPCA's Planned Rules impose too rigorous of a review process for cumulative impacts, there is a significant risk the process could compel companies to abandon plans to build or improve beneficial projects in an EJA, which would in turn poses significant risks of harm to working Minnesotans. Possible but avoidable outcomes include, for example:

    - A worker living in an environmental justice community in St. Paul loses his or her income and health care when the facility where he or she worked in Minneapolis shuts its doors, negatively impacting the worker and his or her family more than residents.

    - An environmental justice community where elevated levels of air pollution are overwhelmingly driven by non-regulated sources could lose economic opportunities associated with a new or expanded facility that will contribute relatively little to environmental or health impacts.

    - The owner of a facility with an existing air permit abandons plans to install new technology that would have substantially reduced GHG and other pollutant emissions in order to avoid undergoing resource-intensive cumulative impacts review.

    - A company abandons plans to invest in a new industrial facility that would bring relatively high-paying jobs, business, and tax revenues to a low-income exurban Twin Cities community with high air quality due to concerns about the cost and uncertainty of the review process.

In summary, we appreciate the opportunity to submit comments on the Planned Rules. If you have any questions regarding our comments, or if you would like to better understand the potential

ramifications for our members, their families, and communities, please do not hesitate to contact us. We look forward to continued participation in the rulemaking process and to further discussions with MPCA as you work toward publishing proposed rules.

Sincerely,

Tom Dicklich

Executive Director

Cecilia Calvo Attachment RECEIVED
By: OAH on 10/6/2023 at 4:13pm

Minnesota Environmental Partnership

www.MEPartnership.org
Suite 100
546 Rice Street
St. Paul, MN 55103
Phone 651.290.0154
Fax 651.290.0167

Office of Administrative Hearings
Attn: Kimberly Middendorf
600 North Robert St
PO Box 64620
Sr. Paul, MN 55164-0620

October 6, 2023

RE: Minnesota Pollution Control Agency Rules Governing Cumulative Impacts Analysis for Permit Decisions in Environmental Justice Areas, *Minnesota Rules*, chapter 7001; Revisor's ID Number R04805

Dear Judge Middendorf:

On behalf of the Minnesota Environmental Partnership and the organizations signed below, we appreciate the opportunity to express our support for the cumulative impacts law and to comment on the rulemaking process for its implementation. The Minnesota Environmental Partnership (MEP) is a state-wide coalition of over 70 environmental and conservation organizations – and other groups that align with MEP's mission and collaborative approach – that advocate together for clean air and water, clean energy and a healthy environment for all Minnesotans.

The cumulative impacts law was passed with the express goal of addressing the harsh disparities in public health that marginalized communities in Minnesota are facing. Historical and current systems of racism and discrimination have resulted in the disproportionate and unjust placement of highways and polluting industries in neighborhoods with higher proportions of Black, Indigenous and People of Color (BIPOC), people experiencing poverty, or people with limited English-language proficiency, who are defined as environmental justice communities for purposes of this new law.

In addition to being burdened by higher levels of pollution from traffic and industrial sources, environmental justice communities are more likely to experience higher rates of unemployment, poverty, arrests, and incarceration while also facing systematic barriers to homeownership, generational wealth, educational attainment, livable wages, and healthy food access. These underlying socioeconomic disparities and higher pollution exposure result in health disparities, including shorter lifespan, higher rates of infant and maternal mortality, and higher incidence of heart disease, cancer, asthma and diabetes. For example, Black and American Indian infants are twice as likely to die before their first birthdays as white infants in Minnesota. Affected communities include urban, suburban, rural, and tribal areas.

We appreciate the opportunity to express our support for the cumulative impacts policy and comment on the rulemaking process for its implementation. The cumulative impacts rule must effectively protect the people and environment, especially in areas and communities that it has historically failed. The rule must center anti-racism and environmental justice to reach lower pollution levels for impacted communities. This means that the MPCA — together with community members — must collaboratively and transparently create these rules.

The intent of the cumulative impacts law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must:

- Ensure that cumulative impacts analyses are made easily accessible and understandable for community members.

- Create a process for impacted areas to approve or deny a community benefit agreement. The procedure for entering into a community benefit agreement must include community participation. We recommend the agreement be ratified by the impacted community before being signed by the MPCA.

- Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made.

This rule must both reduce existing pollution and prevent new pollution in environmental justice areas, which will only be achieved through accountability, transparency and listening to the voices and expertise of impacted communities. The rule must embody the intent of the legislation, which is to improve the health and quality of life in environmental justice communities.

There have been too many instances of state agencies favoring the interests of industry over people and the environment. That needs to change. This rulemaking process presents the agency with an opportunity to fundamentally shift its community outreach and engagement and to begin building authentic relationships with community groups and leaders. This process must reflect the ideals of the cumulative impacts law for marginalized communities to have real power in regulatory decisions that affect them. This law will not fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step.

Thank you for your consideration. We look forward to continuing to work with you in this process.

Sincerely,

Steve Morse

Submitted on behalf of the organizations on the following page:

A.C.E.S. (Austin Coalition for Environmental Sustainability)

Bicycle Alliance of Minnesota

Clean River Partners

Climate Generation

Climate Land Leaders

Cooperative Energy Futures*

COPAL

CURE MN

Environmental Justice Coordinating Council*

Eureka Recycling

Fresh Energy

Friends of the Mississippi River

Izaak Walton League Minnesota Division

Lakeville Friends of the Environment*

Land Stewardship Project

League of Women Voters

Lutheran Advocacy Minnesota

Minnesota Center for Environmental Advocacy

Minnesota Interfaith Power and Light

MN350

Resilient Cities and Communities*

Vote Climate

**denotes non-MEP member*

RECEIVED
By: OAH on 10/6/2023 at 4:18pm

Minneapolis
City of Lakes

Health Department
505 Fourth Ave S, Room 520
Minneapolis, MN 55415

www.minneapolismn.gov

The following comments are submitted on behalf of staff of the Minneapolis Health Department Sustainability, Healthy Homes, and Environment division.

1. What criteria or benchmarks should be used when the MPCA decides whether to require a cumulative impacts analysis?

As we understand the statute, MPCA must decide whether a cumulative impact analysis is required if a permit is requested within one mile of the Legislature-defined environmental justice areas. In making this decision, the MPCA should first develop more refined or "sub" geographic boundaries where a cumulative impacts analysis is always required. This should be done in consultation with local governments and may include EJ areas the local governments have defined within their jurisdiction (such as the Green Zones in North and South Minneapolis).

Within the Legislature-defined EJ areas but outside of those sub-geographic areas, MPCA should include an evaluation of concentration of other facilities (of all sizes) and type of other pollution sources in the area to decide whether a cumulative impacts analysis is required. This evaluation should be done in collaboration with local government and community, who may be able to share additional quantitative and/or qualitative data on those sources.

MPCA should also consider including additional air quality data into both the criteria and benchmarks used to determine if an analysis is required and in the definition of substantial adverse environmental impact. This may become especially pertinent with the funding being allocated for community air monitoring work.

2. What defines a substantial adverse health and environmental impact and how is it measured or assessed?

The MPCA should consider how to define a substantial adverse health and environmental impact equitably; not equally. The threshold for a substantial adverse health and environmental impact may be lower in some areas than others, dependent on existing rates of disease and illness.

MPCA should consider working with MDH and local agency epidemiologists to consider areas with higher rates of disease and illness (e.g., cancer and asthma) and how these rates should impact the definition of a substantial adverse heath impact in that area. The impact should not be defined and measured the same across all areas.

3. Should the community benefits agreement (CBA) only address environmental improvements, or should it also include items like housing, community services, and job creation?

Contents of the CBA should be determined between the community and the permitee. Consideration should be given to who in the local community "signs-off" on the CBA. For example, does MPCA sign off on the CBA with the facility, or is the agreement between the facility and the community. If the agreement is with the community, does it need to be with a recognized organization such as a neighborhood association?

Other questions and considerations from the City of Minneapolis:

- Will there be a support process for local municipalities to fill in the gaps of this state process? To build their own cumulative impacts analysis for the smaller sources that do not have an operations permit?
- How will this intersect with the air toxics legislation? How will these new data be included in the cumulative impacts analysis (monitored or modeled data)?

- There should also be consideration to building an on-ramp for pre-existing facilities that have non-expiring permits. And will the threshold for facilities that require air permits be changed, adding new facilities to the list of those that need a determination for cumulative impact analysis?

RECEIVED
By: OAH on 10/6/2023 at 4:24pm
Nahid Khan Attachment

Date: October 6, 2023

From: Nahid Khan, 28-year resident of Brooklyn Center, MN: an Environmental Justice area and city with the second highest level of air pollution, and numbers of asthma, COPD and respiratory diseases, hospitalizations and deaths in the state.

To: Minnesota Pollution Control Agency

Re: MN state Cumulative Impacts of Air Pollution Law: Rulemaking process and criteria for implementation.

As human beings, we the residents of Minnesota have a basic human right: to breathe clean air. This is the fundamental basis for life. That basic right extends to all living beings: birds, animals and plant life. Clean air is basic to a healthy ecosystem and environment upon which all life on this planet depends.

Therefore, it is indeed an important step forward for the Minnesota Legislature to have passed a new state law this year subjecting air permits for facilities to undergo environmental analysis within a framework of cumulative impacts of air pollution.

As the Minnesota Pollution Control Agency enters into the rulemaking process for the new state law on the cumulative impacts of air pollution law, I want to stress the importance of significant and meaningful public engagement that must play the leading role in defining the process and criteria for implementing this important environmental law. This public engagement must center community knowledge, history, experiences and concerns, listen to community voices, and look to community leadership as partners in the rulemaking process for this law.

No taxation without representation in this case means we the residents, workers, taxpayers, citizens, voters and constituents must always be at the forefront of consideration when it comes to environmental analysis of the cumulative impacts of air pollution UPON US!

It must be recognized that this is the imperative of democracy at work and thus the political priority when it comes to the work of the MPCA as a state government agency funded by taxpayers in our democratic political system that is supposed to serve We the People!

Democracy must always prevail over economic systems, including capitalism. Industries, commercial manufacturers, and businesses overall must be subjected to democracy and the prioritization of the equity, health and environment of We the People over the profit-making concerns.

Failure to prioritize the People over profits has seriously harmed our environment, human health, and equity at all levels. North Minneapolis and Brooklyn Center have the highest and second highest levels of air pollution in the state, and therefore the highest and second highest rates of asthma, COPD and respiratory diseases, hospitalizations and deaths in the state, and Brooklyn Park's levels of these are on the rise.

Half of the Twin Cities as well as large areas of Greater Minnesota fit the definition of an Environmental Justice area as determined by the MN state Legislature, and the MPCA must focus on learning from residents, including those of Brooklyn Center and Brooklyn Park, as well as North Minneapolis.

Our three communities are in the process of being subjected to another grave environmental injustice: MnDOT's Hwy 252 / I-94 project through our cities. This project began undemocratically, limits community feedback and public comment to ritualized programs and a symbolic "box ticking" process to show decision-makers only that it was done, and ignores the equity, health and environmental impacts upon the people it is being imposed upon.

MnDOT's preferred project design alternative for Hwy 252 through Brooklyn Center and Brooklyn Park is expansion from a local roadway / non-freeway expressway to a 6-lane freeway that will double the traffic from 56,000 vehicles daily to 114,000 vehicles daily. Hwy 252 is currently a Tier 3 truck route that is used by only a few hundred trucks daily but with an expansion to freeway, it will become a Tier 1 truck route with thousands of heavy freight trucks traveling on it daily. Supposedly this preferred alternative is going to make Hwy 252 "safer" although it is well-known that air pollution kills 10 times or more the number of people than are killed on highways (in the case of Hwy 252, it is 11 times more people die from air pollution in the adjacent zip codes than are killed in crashes on the highway). Supposedly this preferred alternative is going to reduce the already non-existent congestion (well below 1 hour daily on weekdays, according to the Met Council's Transportation Policy Plan (2020)). But double the vehicle traffic and turning Hwy 252 into a Tier 1 truck route will significantly increase air pollution impacts and cumulative air impacts for residents of adjacent neighborhoods and the Mississippi River environment. The No-Build alternative (to keep Hwy 252 as is) will increase daily traffic by only 4,000 at most by 2040 (2020 projection). So for environmental, health and equity reasons, the No-Build alternative is the least harmful one for Hwy 252.

MnDOT's preferred project design alternative for I-94 through Brooklyn Center and North Minneapolis is an expansion plan to add more lanes to an already overbuilt existing freeway that has far less traffic than its capacity. Even if Hwy 252 is expanded into a freeway, the projected increase in traffic numbers on I-94 will not meet the current capacity of I-94 and therefore does not justify a further expansion of I-94. Rather, since it is overbuilt anyway, a reduction in size would be a better environmental, health and equity choice for I-94 through North Minneapolis and Brooklyn Center.

This harmful freeway project, along with the harmful freeway project for I-94 through St. Paul, and other highway expansion projects are not included in this cumulative impacts of air pollution law, but they should be. Indeed there is a deafening silence on the harmful environmental, health and equity impacts of freeways in all the recent state plans and laws: the Governor's Climate Action Plan of 2022, the MN state Transportation Bill of 2023, and not this state Cumulative Impacts of Air Pollution law of 2023. Supporters of all of these and other actions praise their work to achieve these laws and plans as transformative, yet not a one of them say anything about the harms of highways, expanding them into freeways, and making existing freeways bigger.

Air permits should be required for expressways, highways and freeways, and this Cumulative Impacts of Air Pollution law and its rules should be applied to analysis of air pollution caused by both building them as well as the vehicles traveling on them. Leaving them out is leaving out a big source of air pollution that factors into Cumulative Impacts of Air Pollution. It is not possible to get a full picture of the data concerning Air Pollution and its Cumulative Impacts when one major source of such is blatantly ignored at every level, particularly by MnDOT, and met with silence by everyone else: all those who worked on and wrote and lobbied to pass the Governor's Climate Action Plan, the state Transportation Bill and now

this law on Cumulative Impacts of Air Pollution. Leaving expressways, highways and freeways out of such work is in fact, unfair, unjust and unethical. It is a horrific failure on the part of environmental regulators.

The MPCA is asking for public input on the following process indicators:

1. Benchmarks to determine when a cumulative impacts analysis is required / Thresholds beyond which cumulative impacts of air pollution become important:

   Analysis must pay attention to short periods of time when cumulative impacts are evident:
   a. transportation emissions,
   b. industrial emissions,
   c. radon gas,
   d. fire and smoke, and
   e. smoking.

   They all add up and effects are biggest in:

   a. short time periods and
   b. over small areas nearest the sources:

   so those should be the benchmarks for daily measurements not ambient measurements.

2. Required content of cumulative impacts analysis:
   Mobile Source Atmospheric Toxics (from vehicles, industrial pollutants, radon gas, wildfire smoke).

3. Public Data Sources for environmental stressors in EJ areas.
   The obvious ones are

a. Minnesota Department of Health studies on asthma, COPD, respiratory diseases, cardiovascular diseases.
b. Proximity to transportation routes, especially freeways, highways, expressways and other high-traffic roadways.
c. Our Streets Minneapolis and Sierra Club, NorthStar chapter (and other transportation justice, environmental justice, equity and social justice organizations)
d. Data sources from satellite imagery looking for air pollution.

4. Define conditions, criteria or circumstances that establish an environmental or health impact as a substantial adverse impact:

Medical:

a. Visits to doctors' offices, clinics, community and school clinics;
b. Emergency room visits, hospital admissions and length of stays, types of medical treatments, numbers of deaths;
c. Medications prescribed, prescription numbers and rates.

Environmental:

a. Odor in air,

b. Visibility of pollutants in the air (such as smoke particles, nitrous oxides, greenhouse gases, sulfurous oxides, ammonia, volatile organic compounds, ozone);
c. Pollutant concentrations.
d. Air pollution such as microplastics and tire particles that blow into the air, PFAS (industrial pollutant) found in water (drinking water, wells, streams, rivers, lakes).
e. Numbers of wildlife; numbers of pollinators, insects, birds, fish, animals (numbers of dead creatures).
f. Sound / noise, and light pollution.

Question: Why are you people asking US laypeople to tell you this when you know better than we do what these problems are?

5. Community Benefit agreements:
    a. As human beings who need clean air to breathe and live, clean air is a basic human right that cannot be traded away.
    b. No supposed community benefit exists or can be provided to offset the loss of clean air to breathe and live.
    c. It is unethical to even consider allowing a polluter (facility) to get away with infringing upon the human right of breathing clean air to live by offering, or trading for, some supposed community benefit, which comes at the cost of clean air to breathe and live.
    d. MPCA or any state agency cannot be allowed to have the power to negotiate with polluters to enable them to continue, expand or begin to emit pollutants in exchange for some supposed community benefit.
    e. For example, it is unethical to tell communities that there will be jobs at the polluting facility as a trade-off for the facility polluting the air of that community and surrounding areas which the people working those jobs (and their families, neighbors and community members) have to breathe, which makes them sick. This should absolutely not be allowed.
    f. The purpose of this Cumulative Impacts of Air Pollution law is to make the air cleaner; all rulemaking and applications of this law must reduce pollution from current levels and result in that is much cleaner than current levels.
    g. Polluting facilities must be made aware that they are responsible for cleaning up pollution and not producing any more, and must be induced or forced to change their polluting ways.

6. Develop a public petition process for requiring a cumulative impact analysis:
   This is a good idea overall for citizens to have the ability to ask for such analysis.
   It needs to address the following:

a. Rules for collecting, verifying signatures, minimum number needed, residency requirements for signers;
b. To whom are petitions to be delivered;
c. Timeline for taking the petition into consideration and starting the cumulative analysis.

As members of the public, it is clear to us that our environmental regulatory system has failed to properly protect our environment, health, climate and equity. Corporate pollution, which is exacerbated by systemic inequities, oppression and racism, has devastated our lower income, working class, less

educated, marginalized communities for decades. That needs to change. We need an environmental regulatory system that works to protect the people and environment, especially in areas that it has historically failed. In particular, this means North Minneapolis and Brooklyn Center, as well as other parts of the Twin Cities, particularly in neighborhoods next to freeways, highways and expressways.

This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires:

- Adequate access so there are no barriers to participation.

- Equitable standing so people are treated fairly and with respect with valuable expertise to offer.

- Influence so that comments and feedback provided are actually incorporated into the process and rules written, and aren't merely window dressing or rituals designed to show that community engagement was done, without having any actual influence (in the manner that MnDOT operates, to build the project they want, without the public having any actual influence, which is of course the plan all along, to prevent public influence to stop harmful freeway projects).

- Transparency with who is involved in the process, both inside and outside the agency.

The rules themselves must also center these values. The intent of this law is to reduce pollution from existing levels in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted (if at all; most would prefer polluters to be shut down).

To achieve this intent, these rules must:

- Ensure that cumulative impacts analyses are made easily accessible and understandable for community members.

- Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial, or be "grandfathered" in to continue polluting.

- Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made.

Our state agencies have a history of siding with industry over people and the environment. That emphasis on supporting capitalism over democracy needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in environmental regulatory decisions that affect them.

This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable.

Ultimately, and sooner rather than later, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.

Thank you for your full attention to this important issue for the equity, health and environment of our adversely impacted communities in EJ areas, not to mention our climate.

Date Submitted	Supporter Name	Supporter State/ Province	Form Name	Message Subject	Message Text	Supporter Zip/Postal
10/3/2023	nelson, joy	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55406
9/22/2023	Cramer, Rebecca	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must include Community Input	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55406-1922
10/4/2023	Benson, Sam	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55403-3873
9/21/2023	Garraway, jessica	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As a teacher in North Minneapolis and resident, I see ridiculously high rates in asthma due to disproportionate placement of polluting industries. This is unacceptable. It is time that the MPCA does right by our communities! This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. We will be fighting and watching,	55411-1421
9/12/2023	Borgeson, Dean	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	56442-3081
9/9/2023	Borgeson, Dean	MN	MPCA Comment Collection	Center Environmental Justice!	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	56442-3081

9/27/2023	Kemp, Loni	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55922
10/5/2023	Herron, Linda	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	I do not live in a specific environmental justice area of my Duluth community. However, I know many families who do live in the area of the Hibbard energy plant in West Duluth. That section of Duluth has been listed as an area of high vulnerability to the damaging effects of pollution from highway traffic and the Hibbard plant which burns coal. For far too long polluting industries have been located in areas of town which are home to Indigenous, Black and low-income individuals. The new Cumulative Impacts Law needs to address these injustices and concentrate on just such vulnerable sectors of the city. The specific criteria to consider for requiring a cumulative impacts analysis must include: 1. current negative impacts from polluting industries. 2. the amount of pollution from any proposed industries. 3. past and current health impacts to the community being considered for additional pollution. The goal of any pollution impact study should be the reduction of existing pollution and prevention of additional pollution. Health risks to consider must include those impacting children, older, and already health- compromised individuals. The entire process of soliciting input from the public must be transparent and open. The public needs to know what decisions are being made, how they are made, who is making them and how they can give feedback to the MPCA during the entire process. Regular open meetings are necessary. In the past, industry and business leaders' voices have unfairly outranked community voices, if the community has even been given adequate opportunities to comment on the process or the decisions reached. The responsibility to reach out to the community lies with the MPCA. Please consider funding MPCA agency representatives to contact members of the community or hire community members to gather input from the community residents. All voices should have equal standing and community comments should be reflected in the process and rules to be finalized.	55812-1536
9/29/2023	NETHERCUT, Richard	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55922-1548
9/29/2023	Popowski, Christine	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55408-1448
9/29/2023	Popowski, Christine	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55408-1448

10/6/2023	Norrgard, Lois	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	Dear MPCA staff, I have participated in numerous comment periods to our state agencies for numerous issues from new polluting industries to how our public lands are being industrialized. I am asking that true impacts to our environment be taken seriously. Air pollutants, water pollution, dumping chemicals into our soil - all have been historically overlooked by MN regulatory agencies. This history of systemic injustice has led to certain communities bearing even more of the brunt of pollution, leading to increased health, environmental, economic, and social inequities. For human health NO amount of toxins are ok - benchmarks to determine when a facility is required to conduct a cumulative impacts analysis must be very stringent. Communities must have the right to reject a community benefit agreement. Including all new permits, any major expansions of permits, and the reissuance of permits. The permit applicant must also show that there will be benefits to the impacted community that go beyond jobs. As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protecAs the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55420-5423
9/12/2023	Blanke, Chelsey	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55418
10/2/2023	Fahlstrom, Jeanne	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. The MPCA regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. Please, for once, hold yourselves accountable too. It is getting ridiculous for Minnesota citizens to always have to call you out and hold you accountable! This is especially frustrating when your grandchildren are being poisoned by the toxins from the air they breathe (or try to breathe with asthma) and the water they drink and swim in. It's time to stop giving these corporations permit! They must stop adding to the already dangerous pollution they are causing. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities. Listen to the people and act for a change. We can't keep giving you chances if you don't act to stop the harm once you hear about it from those affected. Stop being so corrupt!	55418-2223
9/9/2023	Villafuerte, Juan C.	MN	MPCA Comment Collection_ESP	La elaboración de normativas sobre impactos acumulativos debe centrarse en la justicia ambiental.	El aproche que están tomando muchas agencias es basado en la contaminación existente y los sistemas socioeconómicos actuales y el principal problema está en el conflicto de intereses que está situación genera. No podemos seguir explotando rapas mente nuestros recursos naturales y querer estabilizar el calentamiento de nuestro planeta al mimo tiempo en verdad la solución está en tomar medidas inteligentes y implementarlas rápidamente sin tanta burocracia politiquera y económica. Se habla mucho de la basura y el petróleo, millones de barriles diarios UNA LOCURA "indispensable" en estos momentos y millones de toneladas de basura qué en su mayor parte no son reciclables especialmente en países, "POBRES "" ,""DEL TERCER MUNDO "", ""EN VÍAS DE DESARROLLO "" . Se devén realmente tomar medidas ambientales y humanitarias innovadoras y drásticamente implementarlas globalmente. En lo personal El embotellamiento del agua es uno de los problemas más grandes de nuestro tiempo y casi nadie habla de eso pero si hablamos del nuevo sabor de algunas bebidas. Como dice el dichos de nuestros abuelos "AGUA QUÉ NO AS DE VEVER DÉJALA CORRER "" . No mas atole con el dedo para la población global de parte de líderes corruptos vendiéndose a los intereses privados y qué las agencias como MPCA realmente realize su trabajo .	55447
9/9/2023	Asher, Louis	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55127-3624

9/9/2023	Meierotto, Richard	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities. Thank you for trying to do justice.	55001-9371
9/11/2023	Fitzgerald, Jerry	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	56452-2265
9/11/2023	West, Alice	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55604-3106
9/30/2023	West, Alice	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55604-3106
9/11/2023	Wilcox, Kimerly	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55330

9/11/2023	Moss, Paul	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55110-3755
9/11/2023	Bratvold, Gretchen	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55406
9/11/2023	Linnerson, Gail	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55107-3208
9/11/2023	Kemp, Loni	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55922-1548
9/11/2023	Dacey, Florence	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55057

9/11/2023	Stromgren, Jeff	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55408-2918
9/11/2023	Darley-Hill, Susan	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to emphasize how important it is that our state regulations truly protect our environment and everyone (everyone must include marginalized communities that have suffered cumulative impacts of pollution at a higher degree than the general population!) This rulemaking must focus on environmental justice in order to reduce impact in these already heavily affected areas. Plain truths, clear communication, and open access during this rule making process is essential to include the voices which are often disregarded or never even heard at all. This process must provide an easily accessible means for participation by community members. Heed must be paid to those community voices that deserve recognition and whose words carry valuable weight and deserve full consideration on par with other stakeholders. The rules themselves must also focus on the intent of this law: to reduce pollution and its negative and long-lasting impacts on already overburdened communities; to increase transparency and provide residents a real say in which facilities get permitted. Marginalized communities must have a strong say in regulatory decisions that affect them. Creating rules that emphasize community participation and empowerment in building a safer and healthier environment for the impacted citizens is a critical step in righting the wrongs that have been done over many decades. I am asking rule makers to welcome input and listen to the voices and expertise of impacted communities. Sincerely, Susan Darley-Hill Duluth, MN	55812-1217
9/12/2023	Astleford, Jason	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55419-2406
9/12/2023	Rule, Juliann	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	56310-9636
9/12/2023	Graham, Kate	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55113-4531
9/12/2023	Profant, Carmine	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	Let's prioritize meaningful public engagement and centering community leadership in the cumulative impacts law. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55407-3111

9/12/2023	Brockway, David	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities. Let's treat people fairly, and not have under resourced communities pay the price!	55343-8566
9/12/2023	Friedlund, Philip	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55102-2114
9/13/2023	McGilligan, Mary	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55616-1429
9/29/2023	McGilligan, Mary	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55616-1429
9/13/2023	Root, Mary	MN	MPCA Comment Collection	I urge you to have Cumulative Impacts Rulemaking Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55119-5961

9/16/2023	Wenzel, Joseph	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55042-9662
9/19/2023	Wenzel, Joseph	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55042-9662
9/27/2023	Wenzel, Joseph	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55042-9662
9/19/2023	Torkelson, Marilynn	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55347-5344
9/19/2023	Oberto, Toni	MN	MPCA Comment Collection	Please Prioritize Environmental Justice	I live in northeast Minneapolis. Nearby decades ago was a factory. It has since been shut down and demolished. This past summer, city officials came out to assess our property as it was akin the risk zone for chemicals that leaked into the ground. Our crawl space came back as a high threat. They were able to seal off the crawl space but our property will need to continue to be monitored. Down the road in north Minneapolis is the metal recycling center that is shooting tons of pollutants into the air, harming my neighbors. We shouldn't have to live this way. As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55418

9/20/2023	Carroll, Felicity	MN	MPCA Comment Collection	Center Environmental Justice in Cumulative Impacts Rulemaking	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. In the end this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55414-2576
9/20/2023	Swiglo, Holly	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55108-2349
9/25/2023	Swiglo, Holly	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55108-2349
9/22/2023	Sorge, Sven		MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	10713
9/22/2023	Gendvil, Derek	NV	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	89117-5744

9/22/2023	Gendvil, Derek	NV	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	89117-5744
9/24/2023	Stephens, Charlotte	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	56303-2536
9/25/2023	Schultz, Steve	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55416-4633
9/25/2023	Furshong, Peg	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in ALL environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	56285-1177
9/25/2023	Petrich, Steve	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	56285-1177

9/25/2023	Overend, Michael	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55616-4004
9/25/2023	carlson, christopher	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55345
9/25/2023	Templin, Tracy	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	56342-4623
9/25/2023	Snyder, Brad	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking MUST Center Environmental Justice!!	As the Minnesota Pollution Control Agency enters into the rulemaking process for the Cumulative Impacts Law, I want to stress the importance of meaningful public engagement and centering community leadership!! As a Science Teacher/Environmental Educator, Mechanical Engineer (Emphasis: Environmental Science/Eng.), and an extremely concerned Minnesotan, I wholeheartedly insist our regulatory system properly protect human health and the environment, and takes into account ALL cumulative impacts of pollution and ALL affected communities MUST be heard and involved in the rulemaking process!!! Our regulatory system has failed to properly protect our environment, health, and climate!! Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades!! That needs to change!!! We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed!! This rulemaking MUST center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities!! This means the MPCA together with community members MUST collaboratively and transparently create these rules!! This requires: - Adequate access so there are NO barriers to participation! - Equitable standing so people are treated fairly and with respect with valuable expertise to offer! - Influence so that comments and feedback provided are actually incorporated into the process and rules written! - Transparency with who is involved in the process, both inside and outside the agency! The rules themselves MUST also center these values!! The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted!! To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members! - Create a process for impacted areas to approve or deny a community benefit agreement! We cannot have the MPCA making deals with developers to allow them to bypass permit denial!! - Provide clear guidelines for making decisions under the law! For the sake of accountability and generating trust, the MPCA MUST explain how and why decisions are being made! Our state agencies have a history of siding with industry over people and the environment!!! That MUST change!!! We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them!! This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step!! That is why I will be following this rulemaking process, and holding you accountable!!! At the end of the day, this rule MUST both reduce existing pollution and prevent new pollution in environmental justice and frontline communities!! This will only be achieved by listening to the voices and expertise of impacted communities!! Thanks!	55369-9270
9/26/2023	Slama, Kay	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	56288

9/29/2023	Slama, Kay	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	56288
9/26/2023	ahlstrand, heidi	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55060-5688
9/26/2023	Cirisan, J. Noelle	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55345-6083
9/26/2023	Madden, Alice	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55407
9/27/2023	Tjepkema, James	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities. I support the need to include all parts of the state in the rules covering the Cumulative Impact Law. Significant pollution can be found all across the state. No part of the state should be excluded from coverage under this law. People with limited resources are also found all across the state and may already have problems with pollution where they live. It would doubly bad to allow more polluting facilities in an area where there is significant pollution and also where people live who have limited resources.	55417-1606

9/29/2023	Sévilla, Caroline	TX	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	77420
10/6/2023	Sévilla, Caroline	TX	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	77420
9/29/2023	Pinque, Meryl	ME	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	04401-6732
9/29/2023	Doss-Smith, Patrick	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	56007-1617
9/29/2023	Waddick, Louise	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55438-2629

9/29/2023	Tran, Sheila	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55122-1634
9/29/2023	Richtman, Paul	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55082-5287
9/29/2023	Horner, Sarah	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55406-2248
9/29/2023	manion, mary jane	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55804-1949
9/29/2023	Brallier, Amy	MN	MPCA Comment Collection	Ask communities of culture to sit with you in this process	Follow and apply the input received after you listen to ideas from indigenous relatives. As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55330-1562

10/4/2023	Brallier, Amy	MN	MPCA Comment Collection	Environmental	Please look at multiple sources of pollution in a given area (rather than just the pollution associated with the project under consideration) when making permitting decisions in communities burdened by environmental injustice. As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55330-1562
9/29/2023	West, Eric	FL	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	32127-6515
9/29/2023	Ernst, Christa	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55117-4221
10/5/2023	Ernst, Christa	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55117-4221
9/29/2023	Ham, Carolyn	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55116-1411

9/29/2023	Margolis, Laurence	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55345-1803
9/29/2023	Oda, John	CA	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	94115
10/4/2023	Oda, John	CA	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	94115
9/29/2023	Katz, Sara	CA	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	90266-4838
9/29/2023	Brennan, Megan	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	Living in Minneapolis, the amount of pollution from highways, the airport, and industrial sources is concerning to me. I want to see communities informed about sources of pollution near them, and for communities to be involved in decisions that involve increasing pollution near them. As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55406

9/29/2023	OMeara, Colleen Joe	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55411-2325
9/29/2023	Jakusz, Darlene	WI	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	54407-9580
9/29/2023	Charlot, Rutherford	NY	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	11412-1063
9/29/2023	Councilman, Dave	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55426-1936
9/29/2023	Klinefelter, Diane	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55117-3360

9/29/2023	Renn, Eli	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55422-3139
9/29/2023	Renn, Eli	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55422-3139
9/29/2023	Kearns, Meg	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55803-2149
9/29/2023	Schmidt, Roger	WI	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	53562-3266
9/29/2023	Balaban, Susan	IL	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	60091-2949

9/30/2023	Schreck MD, Kate	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency about who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55441-1150
9/30/2023	Valentine, Jennifer	NY	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	11762-1850
9/30/2023	Goose, Leanna	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	56641-6722
10/1/2023	Halligan, Sue	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55082-5594
10/1/2023	Brodt, Kelsey	MN	MPCA Comment Collection	Communities must be apart of the rule making process	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55448-2230

10/2/2023	Garlich, Jo	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55407-3217
10/6/2023	Garlich, Jo	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55407-3217
10/2/2023	Crazy Hawk, Erica	MN	MPCA Comment Collection	I believe we need to declare emergency here Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55303-4387
10/2/2023	Mastellone, Genna	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55407
10/2/2023	Wirth-Petrik, Brittney	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55418-3846

10/3/2023	La Vigne, Dan	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55126-3115
10/3/2023	Tellinghuisen, Saari	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made publicly. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55805-2218
10/3/2023	Schaefer, Sydney	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55803
10/3/2023	Koepp, Julia	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	The message below is only a generated block of text, but reading it has made me realize that there is nothing that I could tell you about the pollution of Earth that you don't already know. Why am I even writing to you then? I am doing this simply for my environmental science class, but this class has taught me so much valuable information in only four weeks. I'm not super passionate about climate change or pollution but there are so many more people like me who literally just don't want to think about it because of anxiety for the future. I think that everyone at MPCA does a fantastic job educating people to think more productively about the future. As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas where it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents with a real say in which facilities are permitted. To achieve this intent, these rules must: - Ensure that cumulative impact analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefits agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55810-1933
10/3/2023	Herron, Norman	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	While you work for a healthy and equitable Minnesota, consider emphasizing anti-racism and environmental justice as you plan to lower pollution levels for impacted communities. Minnesotans need healthy air, sustainable lands, clean water, and a healthy climate for all of us. Focus your attention on working collaboratively and transparently; that is, recognizing that everyone's voice counts.The public must be informed of how decisions are made and who is making them. Is the MPCA subject to undo outside industry and business lobbying to influence decisions that affect the public? Maintain ongoing, scheduled community listening sessions for comments and feedback. Focus your attention as well on reducing our carbon footprint and protect the quality of life from major impacts of climate change. Make sure to do the most effective and equitable restoration and protection efforts possible. You are our environmental steward in Minnesota.	55812-1536
10/3/2023	Pearson, Andy	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55407-2453

10/3/2023	Herther, James	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55117-3586
10/3/2023	OMeara, Colleen Joe - CFBD	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55411-2325
10/3/2023	Bogolub, Larry	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55105-2216
10/3/2023	Romero Villanueva, Sonia	NY	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	10038-3305
10/3/2023	Baka, Ryan	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55411-1253
10/3/2023	Hunter, David	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, it needs to remember that the people who have the most to lose often have little or no voice, and it behooves the MPCA as all of us to make sure that their needs and concerns are addressed. This rulemaking must focus on environmental justice in order to result in lower pollution levels for impacted communities. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made.	55401-2451

10/3/2023	Sanders-Reed, Akilah	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55407
10/3/2023	Bellamkonda-Athmaram, Vedavathi	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55441-6417
10/3/2023	Diliberti, Sophie	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55105
10/3/2023	Fielder, Linda	TX	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	75006-2801
10/3/2023	Schneider, Ellie	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55407-1247

10/3/2023	Jackson General Founder's, President Donnie	LA	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	71302-3349
10/3/2023	Rambo-Jones, Lynn	OK	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	73013-7575
10/3/2023	King, Tammy	MA	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	01440-1505
10/3/2023	Abrahamson, Harmon	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Include Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the Cumulative Impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access for all, so there are no barriers to participation. - Equitable standing, so people are treated fairly and with respect for the valuable expertise that they have to offer. - Influence, so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency about who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55443-1720
10/3/2023	Ande, H	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55075

10/3/2023	Olsen, Donna	ND	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	58104-8709
10/3/2023	Preston, Cora	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55104-2109
10/3/2023	Hon, Don	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55418-2210
10/3/2023	Ziegler, Russ	IL	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	60516-2032
10/3/2023	Comstock, Jean	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55106

10/3/2023	Frohn, Joyce	WI	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	54901-2967
10/3/2023	Galdo, Querido	CA	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	95445-1415
10/4/2023	Magne, Kathy	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55105-1619
10/4/2023	Stein, Cindy	CA	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	91320-4972
10/6/2023	Stein, Cindy	CA	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	91320-4972

10/4/2023	Close, Brian	SC	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	29403-6342
10/4/2023	Haskin, Roberta	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55431
10/4/2023	Geissinger, Rachel	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55331-3217
10/4/2023	Chinofsky, Laura	PA	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	18966
10/4/2023	Ludington, Mary	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55409-1812

10/4/2023	Pauling, Lynda	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55082-6316
10/4/2023	Keilty, Alexander	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. Access doesn't meant that people can participate if they follow these issues - it means the process actively and meaningfully engages marginalized and oppressed groups in the state. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. White state staff need adequate training to comprehend dynamics of Power in a process. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55406-1627
10/4/2023	McBride, Jane	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55412-1028
10/4/2023	Hulstrand, Karen	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55082
10/4/2023	Benson, Eric	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55416-2642

10/4/2023	Andrews, Robert	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. It only makes sense that if only industrial concerns are being considered, pollution permits would be based solely on the facility asking to pollute, but if the point of environmental regulation is public health, then exposures past and present must be considered. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55901-2746
10/4/2023	Dolph, Christy	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55418-1523
10/4/2023	Johnson, Sarah	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55407-3629
10/4/2023	Wills, Aurelia	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55105
10/4/2023	Coppin, Loni	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55805-3824

10/4/2023	Clough, Jennifer	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55406-3309
10/4/2023	Moore, Emily Ray	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center environmental justice and anti-racism in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Thorough analysis and reliance on current health and pollution data in the community. - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency regarding who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55409-1425
10/4/2023	Austin, Thaddeus	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must include strong Community Engagement and Broad Ecosystem Scoping for each Project	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and taking the broadest, most comprehensive scope in evaluating a given ecosystem or habitat. Before any development project gains approval, the total impact of all environmental insults that are in play MUST be considered. This rulemaking must create vehicles for input for tradionally marginalized communities, which have borne the brunt of pollution in the past. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. At the end of the day, this rule must both reduce existing pollution and prevent new pollution. This will only be achieved by listening to the voices and expertise of impacted communities and making sure the scope of all cumulative impacts are considered by broad scoping of the affected areas.	55105-3254
10/4/2023	Overby, Gary	WI	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	54234
10/4/2023	Parks, Barb	MN	MPCA Comment Collection	Environmental Justice and Cumulative Impacts Rulemaking	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has made great strides in recent decades, but it has missed the boat when it comes to including the people it should be protecting. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation: send out notices by a variety of methods - email, text, posted mail, AND via community groups. - People treated fairly and with respect for the valuable expertise they offer. A community member may not know about the logistics of building a structure, but knows very well the quality of the air they breathe. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. A strong place to start is with the community groups and coalitions who helped promote this bill. These folks are very knowledgeable in who could be involved in the rule-making and in the various factors at play. Including them in the rule-making process will be critical in creating a just product. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the VOICES AND EXPERTISE of the impacted communities. Thank you.	55812-1155
10/4/2023	Rohn, Matt	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55057-1612

10/4/2023	Evon, Debra	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55403-2123
10/4/2023	Fortunak, Sharon	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	An important issue...As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55114-1168
10/4/2023	Santiago, Gabriela	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As you enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement. This rulemaking should center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values.	55104-6505
10/4/2023	Roiger, Pam	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	I support open communication with citizens of Minnesota so transparency is very crucial in my opinion. As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	56601
10/4/2023	Mazanec, Peter	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55117-4228
10/4/2023	Ebertz, Amy	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55104-6732

10/4/2023	DeGross, Lydia	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55419-1810
10/4/2023	Pearson, Ken	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55422-4713
10/5/2023	Groen, Maxime	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55406
10/5/2023	Arnold, John	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made.	55024-9676
10/5/2023	Roth, Erik	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55403-2219
10/5/2023	Bly, Rachel	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55406

10/5/2023	Hodnett, Lynn	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55117-3349
10/6/2023	Fitzpatrick, Lisa	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	I am very pleased that the Minnesota Pollution Control Agency will be making cumulative impact analysis. I lived in a neighborhood impacted by factories and oil tanks nearby. There was no residential zoning. The rent was affordable because of these polluting entities. I was a young mom and my baby tended to get a lot of infections while we lived in that neighborhood. When we moved to another city neighborhood with no nearby factories/large oil tanks/shipping, she did not get sick. Her lungs/ears grew healthier. As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. It is also important to think, do we even need these polluting entities anywhere? Because nobody wants them next door. Nor do we want to put them in the countryside or forests, where there are less people, but more animals& plants that could be harmed. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities. Please listen!	55804-2445
10/6/2023	Swan, Thomlin	MN	MPCA Comment Collection	Cumulative Impacts Rulemaking Must Center Environmental Justice	As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: - Adequate access so there are no barriers to participation. - Equitable standing so people are treated fairly and with respect with valuable expertise to offer. - Influence so that comments and feedback provided are actually incorporated into the process and rules written. - Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: - Ensure that cumulative impacts analyses are made easily accessible and understandable for community members. - Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. - Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	55720-9708

Name	City	State	Zip	Comment	Personal message
Rick Meierotto	Afton	MN	55001	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	Thank you for your time and attention.
Emily Rosenmeier	Lakeland	MN	55043	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Ian Radtke-Rosen	Lakeville	MN	55044	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Wendy Ward	Marine On Saint Croix	MN	55047	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	CUMULATIVE IMPACTS ARE CRITICAL TO COnsider when assessing a project …please pass this law to do so

James & Kathleen Maggi	Pine City	MN	55063	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Tamara Rakow	Rosemount	MN	55068	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	We need to make sure that the environment is protected, that the air that people breathe is safe from pollution. Thank you for your compassion towards people and wildlife.

Lee Waltz	Rush City	MN	55069	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Denise Marlowe	Inver Grove Heights	MN	55076	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	Make the climate crisis center in your rulemaking.

Lynda Pauling	Oak Park Heights	MN	55082	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Sue Halligan	Oak Park Heights	MN	55082	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Jo Anna Hebberger	Saint Paul	MN	55104	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Margaret Levin	St. Paul	MN	55104	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Amelia Narigon	Saint Paul	MN	55105	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Ellen Rozek	Saint Paul	MN	55105	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	It is imperative that an rules the MPCA implement in the coming months focus first and foremost on reducing pollution in communities that have long been most seriously impacted by it. If these new rules don't take the voices and long-term health of margin

Kathleen Stoddart	Saint Paul	MN	55105	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	As a 50 year public school teacher I witnessed the long term effects on urban children who lived in the most polluted parts of our city, particularly with regard to respiratory illnesses and chronic asthma. This directly affects their attendance and abili
Kathy Magne	Saint Paul	MN	55105	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Michael Chutich	Saint Paul	MN	55105	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Cynthia Brockway	Saint Paul	MN	55106	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Dirk Durant	Saint Paul	MN	55106	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Keith Thompson	Saint Paul	MN	55106	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Stuart Knappmiller	Saint Paul	MN	55106	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	We bought our home 47 years ago. Winds out of the south sent noxious fumes over us from at least 3 manufacturing plants. Those plants closed due to economic issues, not because our government cared about our health or our children's health. Let's do bette
Paul Moss	White Bear Lake	MN	55110	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Linda Ruetz	New Brighton	MN	55112	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Bryan Wyberg	Saint Paul	MN	55113	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Craig Christenson	Saint Paul	MN	55113	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Geoffrey Saign	Saint Paul	MN	55116	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Dave Crawford	Saint Paul	MN	55117	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	Liberty and justice for all includes environmental justice for all. Engage all communities in rulemaking and act equally towards all.
James Herther	Saint Paul	MN	55117	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	The people who suffer from the effects of pollution should have influence on decisions about how the situations are corrected.

Curtis Coffer	Saint Paul	MN	55118	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Hideki Yamada	West Saint Paul	MN	55118	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Deborah Webster	Saint Paul	MN	55119	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	I have voted for you throughout the years because you are a firm believer in Minnesota's environment and listening to the voices of your constituents. You are a powerful leader, and I appreciate all you have done for keeping our air, land, and waters clea
Nicole Everling	Eagan	MN	55122	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Matt Humphries	Apple Valley	MN	55124	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Rebecca A Fuller	Woodbury	MN	55125	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Dan La Vigne	Shoreview	MN	55126	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Linda Maloney	Shoreview	MN	55126	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Sharon Coombs	SAINT PAUL	MN	55126	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	The cost of environmental inequity ultimately affects all of us. Note Covid: the high total body burden people experience who live in poverty, have ongoing emotional and physical stress, poor nutrition, inadequate exercise, etc. are more vulnerable to ser
Guy Somers	Woodbury	MN	55129	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Rob Menti	Osseo	MN	55311	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Constance Carlson	Buffalo	MN	55313	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	Centering environmental justice in rulemaking will ensure that the powerless and the voiceless are empowered and no longer silenced in policy. When we intentionally incorporate compassion and justice in our rulemaking, we ensure that policy will be create

Michelle Mcquillen	Chaska	MN	55318	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Erica Wagener	Cologne	MN	55322	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	Values, Integrity, Transparency, Community oriented. Please include these in the rulemaking.

Kim Heinrichs	Elk River	MN	55330	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Kathleen Kaysinger	Minnetonka	MN	55343	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Larry Margolis	Minnetonka	MN	55345	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Terrence Nayes	Eden Prairie	MN	55347	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Caroline Bardwell	Montrose	MN	55363	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	I don't understand why it's so difficult to do the right thing. Protecting the environment makes sense for everyone. There isn't anything on this earth that doesn't need clean water. Who wants to drink micro plastics? Who wants a lake or river they can't
Marck Oconnell	Minneapolis	MN	55403	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Ralph Yehle	Minneapolis	MN	55403	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	Take action to protect low income children.
Sissy Poettler	Minneapolis	MN	55404	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	I would love to buy a car. That would mean 1 less person taking metro transit.

Arthur Rosenberg	Minneapolis	MN	55405	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Christopher East	Minneapolis	MN	55406	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Edward Sisola	Minneapolis	MN	55406	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Mary Blitzer	Minneapolis	MN	55406	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	No matter who we are or what we look like, we deserve clean air. Please create rules that ensure this happens.

Rebecca Cramer	Minneapolis	MN	55406	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	I live and work in South Minneapolis, near the intersection of 27th Ave S. and Lake St. All of the metro's air quality will be impaired, going forward, by the forest fires of Canada and the ever present car traffic. However, the historical accumulation of
Andy Pearson	Minneapolis	MN	55407	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Marcy Leussler	Minneapolis	MN	55407	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	Please listen to the impacted communities.
Mary Sandstrom	Minneapolis	MN	55407	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Pam Martin	Minneapolis	MN	55407	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Wade Johnson	Minneapolis	MN	55407	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	If more people knew, things would change.

Christine Popowski	Minneapolis	MN	55408	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Jean Ross	Jean	MN	55409	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Anthony Thompson	Minneapolis	MN	55410	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Derek Steele	Minneapolis	MN	55410	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

David Moseman	Minneapolis	MN	55414	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Marya Hart	Minneapolis	MN	55414	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Drew Davis	Minneapolis	MN	55417	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won’t fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Samuel Beddow	Minneapolis	MN	55417	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won’t fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	Being sustainable doesn't just mean being sustainable for 'you and yours', so to speak. It means including the most impacted, not simply increasing their burden. My neighbors on one side live with the pollution of a large municipal trash burning plant; on

Randy Nies	Minneapolis	MN	55419	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Glenn Witte	Columbia Heights	MN	55421	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Aaron Mlynek	Robbinsdale	MN	55422	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Lori Ekholm	Minneapolis	MN	55423	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Joyce Prudden	Minneapolis	MN	55426	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Jon Damon	Bloomington	MN	55431	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Roberta Haskin	Bloomington	MN	55431	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	Make the MPCA more accessible!
Susan Ohnstad	Bloomington	MN	55438	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Gretchen Larson	Plymouth	MN	55441	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	We are no longer a state which needs to trade our natural resources for investments in infrastructure. We need our government to protect us and our future generations from corporations who are only interested in profits and pleasing their shareholders. Yo
Steve Chesney	Brooklyn Park	MN	55443	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	Not only must we lower pollution we must avoid concentrating it in low income communities. Don't make them sacrifice for our comfort.

Alice West	Grand Marais	MN	55604	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Edward Shields	Grand Portage	MN	55605	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Robin Raplinger	Virginia	MN	55792	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	Arbitrary and capricious The Minnesota Supreme Court found the MPCA's permit. My tax dollars go to the MPCA to protect our air and our water. Why do I have to rely on nonprofit groups and the Fond du Lac band of Indians to make sure that the rules and pr
Kate Crowley	Willow River	MN	55795	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Warren Howe	Duluth	MN	55802	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Diana Brainard	Duluth	MN	55803	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	I live near the "kill zone" of the Husky refinery (now operated by Cenovus). After the refinery exploded in 2018, no one (including Governor Walz) listened to the 180,000 people who live in the zone. Instead they favored corporate interests (who have al

Jenna Yeakle	Duluth	MN	55807	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Diane Hiniker	Duluth	MN	55811	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Ann Galbraith Miller	Duluth	MN	55812	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	It is unfortunate that many toxic-producing entities are located in low income areas. For example, one elementary school where I volunteer has their playground located underneath a four-lane highway. We need to protect our children from the toxic effects
Dorie Reisenweber	Duluth	MN	55812	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Kamau Wilkins	Rochester	MN	55901	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	I commend the implementation of the cumulative impact bill in Minnesota and its support for environmental justice. This bill, passed last legislative session, is a significant step towards ensuring fairness and protection for communities in major metropol
Katherine Slama	Spicer	MN	56288	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Shawn Kakuk	Saint Cloud	MN	56301	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Cyndi Gardner	Saint Cloud	MN	56303	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Gerald Hasselbrink	Saint Cloud	MN	56303	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	My neighborhood is often polluted with wood smoke from backyard fires. This is the pollution makes it impossible to enjoy my property as well as the city streets and parks. I cannot even leave a window open because wood smoke can come in any time. On o
Jonathan Carlson	Saint Cloud	MN	56303	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Erika Aschmanm	Saint Cloud	MN	56304	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	Protecting us from poisons has to be a top priority. This is not the kind of legislation that can afford to lapse. Endless pressure, endlessly applied threatens our world. Do whatever you can to protect us.
Edward Dunn	Avon	MN	56310	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Juliann Rule	Avon	MN	56310	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Tracy Templin	Isle	MN	56342	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Mike Schramm	Saint Joseph	MN	56374	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
Carol Miller	Sauk Rapids	MN	56379	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	

Emma Needham	Brainerd	MN	56401	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	
John Viacrucis	Moorhead	MN	56560	Dear MPCA staff, As the Minnesota Pollution Control Agency enters into the rulemaking process for the cumulative impacts law, I want to stress the importance of meaningful public engagement and centering community leadership. Our regulatory system has failed to properly protect our environment, health, and climate. Corporate pollution, which is exacerbated by systemic inequities, has devastated our marginalized communities for decades. That needs to change. We need a regulatory system that works to protect the people and environment, especially in areas that it has historically failed. This rulemaking must center anti-racism and environmental justice in order to result in lower pollution levels for impacted communities. This means the MPCA together with community members must collaboratively and transparently create these rules. This requires: * Adequate access so there are no barriers to participation. * Equitable standing so people are treated fairly and with respect with valuable expertise to offer. * Influence so that comments and feedback provided are actually incorporated into the process and rules written. * Transparency with who is involved in the process, both inside and outside the agency. The rules themselves must also center these values. The intent of this law is to reduce pollution in overburdened environmental justice areas, increase transparency, and provide residents a real say in which facilities get permitted. To achieve this intent, these rules must: * Ensure that cumulative impact analyses are made easily accessible and understandable for community members. * Create a process for impacted areas to approve or deny a community benefit agreement. We cannot have the MPCA making deals with developers to allow them to bypass permit denial. * Provide clear guidelines for making decisions under the law. For the sake of accountability and generating trust, the MPCA must explain how and why decisions are being made. Our state agencies have a history of siding with industry over people and the environment. That needs to change. We need this process to reflect the ideals of the cumulative impacts law - for marginalized communities to have real power in regulatory decisions that affect them. This law won't fix everything, but creating strong rules that center community participation, empowerment, and environmental justice is an important first step. That is why I will be following this rulemaking process, and holding you accountable. At the end of the day, this rule must both reduce existing pollution and prevent new pollution in environmental justice and frontline communities. This will only be achieved by listening to the voices and expertise of impacted communities.	