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October 22, 2024

Dear MPCA,

I am writing to provide feedback on the processes concerning when environmental review in cumulative impact areas for industrial facilities should take place, particularly in the context of risk prioritization and discretionary analysis.

First, the process should prioritize addressing high-risk facilities to ensure that the greatest threats to public health and the environment are mitigated. Additionally, it is crucial that these efforts align with the agency's available resources to foster effective communication and partnership with both the community and industry stakeholders. To this end, the rules should clearly identify specific health-based criteria for evaluating facilities.


Moreover, discretionary analysis should not be required for facilities with minor or minimal potential contributions to air pollution. For example, in 2002, the EPA officially delisted asphalt plants as a major source of air pollution. Given their reduced impact, these types of facilities should be exempt from the discretionary analysis under this framework.

Additionally, the petition process should include a requirement that signers be verified as proven residents of the affected area to ensure the legitimacy of community concerns.

Finally, it is important that these processes, as well as the criteria that trigger them, are communicated clearly and remain transparent throughout evaluation and documentation. Such transparency will help build trust between the agency, industry, and the community.

Thank you for considering these recommendations. I look forward to seeing continued improvements in regulatory processes that support both environmental stewardship and practical implementation.

Sincerely,

A handwritten signature in black ink that reads "Abbey C Bryduck". The signature is written in a cursive, flowing style.

Abbey Bryduck
Executive Director
MN Asphalt Pavement Association