

Abbey Bryduck

How should the MPCA know when to require a mandatory cumulative impacts analysis?

The process should prioritize addressing high-risk facilities. It should also align with the agency's available resources to ensure effective communication and partnership with the community and industry. The rules should identify specific health-based criteria.

How should the MPCA know when to require a discretionary cumulative impacts analysis?

Discretionary analysis should not be required for facilities with minor potential contributions. For example, in 2002, the EPA officially delisted asphalt plants as a major source of air pollution. These types of facilities should be exempted under this framework.

What should the MPCA consider for the petition process?

The petition process should require signers to be proven residents.

What do you think is missing?

These processes and their triggers should be clearly communicated and transparent in evaluation and documentation.