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Review the data indicators that are LIKELY to be included in cumulative impacts analyses below and select five which you have concerns about.

Unemployment

Food insecurity

Educational attainment

Solid waste activities

Remediation sites for pollution cleanup

What feedback do you have on the indicators that are LIKELY to be included in cumulative impacts analyses?

These comments are submitted by the Area Partnership for Economic Expansion (APEX), a regional economic development organization representing nearly 100 investor companies in Northeast Minnesota and Northwest Wisconsin.

We believe that any indicators selected should be directly measurable and within the control of the permitted facility.

While we recognize the intent to create a comprehensive approach, we are concerned that including too many broad indicators could create unrealistic expectations and administrative burdens that do not meaningfully improve environmental outcomes.

Our members are committed to environmental stewardship, but we caution against an approach that might inadvertently discourage industrial investment in our communities or create an unproductive binary between economic development and environmental protection. The most effective indicators will be those that:
-Provide clear, actionable insights
-Directly relate to air emissions
-Can be meaningfully addressed by the permitted facility

What feedback do you have on the indicators that have POTENTIAL to be included in cumulative impacts analyses?

Regarding the potential indicators, APEX recommends a cautious and focused approach. We do not support the inclusion of indicators that:
-Extend beyond the direct scope of air emissions permits
-Create speculative or difficult-to-measure community impact assessments
-Impose unreasonable expectations on industrial facilities

Our concern is that broadening the scope of cumulative impacts analysis could:
-Dilute the core purpose of environmental permitting
-Create administrative complexities that do not correlate with actual environmental improvements
-Potentially discourage

economic development in regions that most need investment
-Slow development of industries whose products would meaningfully address climate change and help us meet our state's carbon-free goals

What feedback do you have on the indicators that are UNLIKELY to be included in cumulative impacts analyses?

For indicators currently deemed unlikely to be included, we support maintaining this classification. We believe that an effective cumulative impacts analysis should remain tightly focused on:
-Scientifically verifiable environmental health indicators
-Factors directly influenced by the permitted facility
-Measurable and actionable environmental outcomes

APEX represents nearly 100 investor companies in Northeast Minnesota and Northwest Wisconsin. We are deeply committed to creating a sustainable future that balances environmental protection with economic vitality. While we appreciate the intent behind a comprehensive cumulative impacts analysis, we believe the most productive path forward is one that:
-Maintains clear, focused environmental goals
-Recognizes the innovative capabilities of local industries
-Supports continued economic growth and community well-being

We are grateful for the opportunity to provide input on this important rulemaking process and look forward to continuing this critical dialogue.
