



March 6, 2024

Dear Chair Hawj and Members of the Senate Environment, Climate, and Legacy Committee:

Metro Cities, representing the collective interests of cities in the metropolitan area, appreciates the opportunity to comment on SF 4183 (Fateh), as it is heard in the Environment Committee on Thursday.

Metro Cities supports legislative changes to clarify that cities' comprehensive plans are exempt from review under the Minnesota Environmental Rights Act (MERA). SF 4183 provides municipalities this exemption for elements of a comprehensive plan that authorize increased residential density. Metro Cities supports this provision in the bill.

Comprehensive plans are long range guiding documents for cities and lay out a range of future land use scenarios intended to allow for the orderly and economic development of the region. To allow for local flexibility and functionality, as well as to best align local goals with regional requirements, it is essential that local comprehensive plans remain high-level visioning documents that serve to guide future development and other local goals and policies.

Recent litigation, if successful, could require local comprehensive plans to meet the standards of the Minnesota Environmental Rights Act (MERA), which is not possible given that comprehensive plans are high-level documents and not development plans. Comprehensive plans, under state law, are expressly exempt from the Minnesota Environmental Protection Act (MEPA), unlike development projects, which are regularly reviewed under MEPA. This litigation threatens the ability of cities to conduct long-term planning for their local communities.

Thank you for your consideration of this letter. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'Michael Lund'. The signature is fluid and cursive, with the first and last names clearly legible.

Mike Lund
Government Relations Specialist
Metro Cities