



DEDICATED TO A STRONG GREATER MINNESOTA

April 3, 2025

Chair Hawj and members of the Senate Environment, Climate, and Legacy Committee,

I am writing on behalf of the Coalition of Greater Minnesota Cities (CGMC), an organization of more than 115 cities located outside the Twin Cities metropolitan area, to urge our support for Section 1 and our opposition to Section 3 of S.F. 2833. Our member cities play a crucial role in protecting Minnesota's waters through their publicly owned wastewater treatment facilities, and they may be among the parties most impacted by the changes proposed in Section 1 of this bill. Many of our members also operate municipal electric utilities that could be negatively impacted by Section 3 of this bill.

Section 1 – Adding Flexibility to Wastewater Permitting

We support the language in Section 1 as an important effort to balance the concerns of cities of different sizes throughout the state. The current notice and timing requirements for publicly owned wastewater facilities date back to legislation, [S.F. 672](#), that the CGMC worked with retired Senator Carrie Ruud and a bipartisan group of authors to introduce in 2017.

At that time, multiple cities—particularly smaller ones—had expressed concern that they did not have sufficient time, resources, and underlying technical materials to adequately assess their draft permits in the time given. Thus, the House and Senate environment committees incorporated a modified version of this language into the omnibus environment bill that year, which was eventually signed by Governor Dayton.

Since then, the permitting process for wastewater facilities at the MPCA has improved. Some of our larger facilities do not need this extensive notification and public comment period. Section 1 of this bill provides a reasonable update that reflects the concerns of both large and small communities by doing the following:

- It allows a wastewater permit applicant to waive the requirement that it receive a draft copy of the permit and any supporting fact sheets if it so chooses. (Lines 1.10 – 1.22)
- It allows the commissioner of the MPCA to reduce the comment period for a wastewater permit if requested by the applicant AND after the commissioner has considered the impact on the public or tribal interest. (Lines 2.5 – 2.8)

This approach would allow more sophisticated facilities that do not require additional notice and time to move forward with their wastewater period expeditiously while protecting the smaller facilities that may not have the resources to act and respond as quickly. We believe such an approach is protective of Minnesota's waters as well as the communities who seek to safeguard those waters. We urge this committee to include these changes from Section 1 in your omnibus bill.

Section 3 – Creating Challenges for Emergency Generation

The CGMC objects to the language at 6.19 – 6.22, stating that the MPCA may require air emissions facilities to conduct air dispersion modeling. We are concerned that such language will be relied upon by the MPCA to place

undue burdens on municipally owned utilities in Greater Minnesota and limit or eliminate their ability to rely upon critical backup/emergency diesel generators. These backup generators are essential for rural communities to provide power during grid failure, extreme weather, and other power-related emergencies. The MPCA has sought to require municipal utilities in Greater Minnesota to use modeling to determine whether such diesel generators, which are infrequently used, will cause violations of air standards. However, the model that the MPCA requires forces these utilities to assume they are using the backup/emergency generators at full capacity 365 days a year in worst-case scenarios rather than as a backup. This modeling makes it impossible for many small public utilities to demonstrate compliance, even when there is no realistic scenario that would lead them to violate air quality standards. This could force these public utilities to decommission these essential backup generators and put the lives of Greater Minnesota residents at risk during emergency situations. We urge this committee to reject this proposal or, at a minimum, take further steps to protect emergency backup generation.

Thank you for your consideration.

A handwritten signature in dark ink, reading "Elizabeth Wefel". The signature is fluid and cursive, with the first name "Elizabeth" written in a larger, more prominent script than the last name "Wefel".

Elizabeth Wefel
Coalition of Greater Minnesota Cities