



Association of Minnesota Counties

125 Charles Avenue, Saint Paul, MN 55103-2108 | www.mncounties.org

April 30, 2025

Re: S.F. 2781 (Hawj) Environment and Natural Resources Policy – A1-DE Amendment

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

On behalf of the Association of Minnesota Counties (AMC), a voluntary association representing all 87 counties, we appreciate the opportunity to share our thoughts on the committee's omnibus policy proposal, SF2781 A1-DE amendment.

AMC recognizes the difficult work of the committee this session in reviewing many proposals and competing policy perspectives that you have had to navigate to find compromise and keep Minnesota moving forward.

We are especially happy to see the inclusion of the E-waste and Battery Product Stewardship proposal (Article 2). This is a much-needed update of our existing e-waste and battery laws under MS Chapter 115A, which are no longer meeting the needs of Minnesota residents, businesses or local governments. These reforms have been sought for numerous years and repeatedly resisted by industry. ***Management of these troublesome products is costly for local governments and citizens and their public safety and environmental health issues are skyrocketing - it is time for action.***

Counties support removing language from the definition of Public Waters (Article 1, Section 15), which would contradict the Legislature's primary reason for establishing the Public Waters Inventory (PWI). We support the investment made in updating the PWI to ensure all waters that meet the statutory qualifications are properly inventoried and subject to public waters regulations. Minnesota has additional regulatory tools to manage and protect other waters through our Wetland Conservation Act, which saw updates for greater coverage last year.

We support many of the other provisions of the bill including the deletion of unnecessary reporting that was a consensus recommendation of the Drainage Work Group and part of the repeaters (Article 1, Section 31).

We would like to address a few issues within the provisions in the permitting reform article (Article 3). There is a new reporting requirement (Section 11) that is unnecessary as it is based on a misunderstanding of the deadline requirements of MS 15.99. The allowance for review of feedlot permits during environmental review (Section 6) appears to be "comfort language" as there are no restrictions currently. However, *we would not support the addition of a recommendation for conditional permits being issued because a review of the ER results is necessary and may change the permit.*

Thank you for considering our perspective on the environment and natural resources policy proposal.

Sincerely,



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