



DEDICATED TO A STRONG GREATER MINNESOTA

April 30, 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 comment on a variety of aspects of the Omnibus Environment and Natural Resources Policy bill, S.F. 2781, as found in the A1 amendment.

Article 3, 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. Article 3, Section 1, of this bill updates the timing for wastewater permits (more formally known as national pollutant discharge elimination system, or NPDES permits) that reflect the concerns of both large and small communities by doing the following:

- It allows a wastewater permit applicant to waive the requirement that it receives a draft copy of the permit and any supporting fact sheets if it so chooses. (Lines 53.24 – 53.27)
- It allows the commissioner of the Minnesota Pollution Control Agency (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 53.28-54.5)

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 thank the Committee for including these provisions.

Article 7, Section 3 – Creating Challenges for Emergency Generation

The CGMC is concerned about the language in Article 3, Section 3, Subd. 4g at lines 59.21 – 59.24, 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 no realistic scenario 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 the 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 written in a cursive, flowing style.

Elizabeth Wefel
Coalition of Greater Minnesota Cities