



DEDICATED TO A STRONG GREATER MINNESOTA

To: Representative Leon Lillie and House Legacy Committee

Re: House File 639 First Engrossment

Date: March 16, 2021

Dear Chair Lillie and committee members,

I am writing on behalf of the Coalition of Greater Minnesota Cities (CGMC), an organization of more than 100 cities located outside the Twin Cities metropolitan area. We have a great interest in HF 639 because it has a direct impact on our member cities, which are stewards of Minnesota's waters through their wastewater, drinking water and stormwater systems.

We appreciate the opportunity to comment and thank you for consideration of our input. We want to voice our support for several projects included in the Clean Water Council's (CWC) recommendations.

Fund the Point Source Implementation Grant Program

The CWC has prioritized funding for the Point Source Implementation Grant (PSIG) program in past cycles and has recommended more than \$8 million in each year of the next biennium for the program. Cities are frequently asked to build or upgrade their wastewater facilities to address water pollution. Our cities will continue to step forward to do so, but these systems are expensive, and most communities do not have the resources to pay for these projects on their own. The PSIG program provides grants to help pay for that much-needed infrastructure, which in turn benefits the entire state. These grants are one of the most direct ways the state can protect, enhance, and restore water quality in our lakes, rivers, and streams.

Fund Chloride Reduction Grants for Cities

According to the Minnesota Pollution Control Agency (MPCA), close to 100 municipalities (and possibly more) have the potential to exceed the chloride standard in wastewater. The agency has acknowledged that it is not economically feasible for municipal wastewater treatment plants to treat for chloride and other salty parameters.¹ The process for removing those parameters—reverse osmosis—is prohibitively expensive, energy intensive, and potentially harmful to the environment because of the need to dispose of the resulting salty brine. The alternative to this treatment—reducing chloride in source water—is also prohibitively expensive for most cities due to the high capital and operating costs for centralized softening.

¹ Chloride Work Group Policy Proposal for Minnesota: Recommendations for Addressing Chloride in Municipal Wastewater Effluent, Minnesota Pollution Control Agency, 11 (Apr. 2017), available at <https://www.pca.state.mn.us/sites/default/files/wq-wwprm2-24.pdf>.

A more feasible solution to reduce chloride in wastewater is for cities to encourage residents to remove or upgrade their water softeners. However, promoting this strategy and removing water softeners can also be expensive, especially for small communities. Therefore, we support the inclusion of \$260,000 each year to address activities and grants that reduce chloride pollution.

These are just two of the important clean water projects recommended by the CWC. We urge you to approve and adopt the CWC's spending recommendations.

We have concerns about a provision that was added to the bill that would require the Minnesota Department of Health (MDH) to amend the health risk limit for perfluorooctane sulfonate (PFOS) to a number specified in the legislation. We believe that MDH should be analyzing and potentially revising the health risk limit for PFOS, but this should be done through the rulemaking process, not as part of the Legacy bill. We urge the committee to remove this directive as the legislation moves forward.

Thank you for your time and consideration

Sincerely,



Greg Zylka, Mayor, City of Little Falls
President, Coalition of Greater Minnesota Cities