



In addition, state agencies are often authorized to implement programs enacted by the legislature. Proposed regulations promulgated to implement programs are subject to comment and approval pursuant to the Uniform Administrative Procedures Act (UAPA). This includes the preparation of a fiscal note indicating any municipal impact. However, often times, agencies are implementing programs through permits and policies that are not subject to UAPA. These permits may impose many new requirements on municipalities without regard for the cost to property taxpayers. This is certainly the case with the state Dept. of Energy & Environmental Protection's revised stormwater General Permit.

Accordingly, in addition to requiring unfunded mandates to be approved by a 2/3 majority, COST supports recommendations to:

- Require the legislature to hold public hearings and consider repealing or mitigating recently adopted mandates that have been identified by the Advisory Council on Intergovernmental Relations (ACIR) as having a major municipal cost; and
- Require General Permits and other regulatory policies to be adopted pursuant to UAPA, including the preparation of a municipal impact analysis.

Thank you for the opportunity to comment on the need for mandate relief.

*COST is an advocacy organization committed to giving small towns a strong voice in the legislative process.*