



To: House Natural Resources, Environment, Tourism and Outdoor Recreation
Date: October 19, 2023
Re: support HB's 4824-4826; Eliminates the Environmental Rules Review Committee

Michigan LCV supports house bills 4824, 4825, and 4826 that would eliminate the Environmental Rules Review Committee (ERRC) because:

- It adds an unnecessary, additional layers of bureaucracy and red tape
- It is expensive and time consuming for EGLE to staff, manage and run
- Checks and balances are already built throughout our system of governance
- Undermines the regular work of the legislature, the departments and agencies

The committee was created in 2018 during the last year of the Snyder Administration to oversee all rule-making within the then DEQ (now EGLE). The committee was created to constrain the executive authority of subsequent governors, and it added additional hurdles for EGLE to clear on top of an already thorough and lengthy rule making process.

The committee was designed so that a majority of its members (six) can prevent state rulemaking from going forward, can amend and make changes to rules packages, and the statute gives the Committee the final say over rule-making above and outside of the agency executive authority.

All stakeholders, including private citizens and interest groups, deserve an opportunity to engage state public policy and rule-making processes. It is good governance to build a process that includes interested parties in a just and measured way, but the current statute goes too far by granting appointed parties the authority to subvert the decision making of executive branch staff scientists and subject matter experts, those familiar working within the precise details of state and federal law.

Michigan LCV is not inherently opposed to the idea of citizen engagement boards and committees. Well-designed groups exist across government and they provide advice and engagement opportunities for expert, stakeholder, and resident input. However, the ERRC went too far by leaving the door open for regulated industries, and private, economically interested parties to have decision-making authority over Michigan's environmental rules. That structure is fundamentally reckless when it comes to protecting the health of Michigan families and our natural resources.

States with strong environmental protections have healthy environments and the highest quality of life. This leads to good jobs, and thriving economies. Thank you for your time and consideration!

Nicholas Occhipinti, Michigan League of Conservation Voters

Government Affairs Director