
Memorandum

DATE: December 2, 2025
TO: Lessard-Sams Outdoor Heritage Council
FROM: Jan Voit, Executive Director
RE: STATE AGENCY PERMITTING EFFICIENCY

On November 14 I was made aware that concerns over state agency permitting were discussed at the Lessard-Sams Outdoor Heritage Council (LSOHC) meeting. Minnesota Watersheds considers it necessary for all state agencies to conduct permit reviews in a predictable, transparent, and consistent manner.

I believe it is important for LSOHC to know that over the course of the last year, a small group of individuals representing watershed districts and Minnesota Watersheds has met with Minnesota Pollution Control Agency (MPCA) and Department of Natural Resources (DNR) leadership regarding our organization's and our members' concerns about state agency permitting. The focus has mainly been on DNR permitting. The meetings we've had with DNR leadership have improved communication at the state level, but to date have not produced any substantive changes to the permitting process.

The DNR permit application process remains unclear and inconsistent, particularly regarding the criteria and documentation required, the definition of application completeness, and the triggers for additional information requests. This lack of standardization leads to confusion, delays, and increased costs for applicants, especially for complex projects.

There is a persistent risk of project delays, financial losses, and missed regulatory or grant deadlines due to late-raised issues, unclear escalation procedures, and insufficiently timely responses from DNR. The absence of a transparent process exacerbates these risks.

Regional inconsistencies and subjectivity in permit processing, particularly for unique or complex projects, result in inequitable treatment of similar projects and a lack of shared lessons learned. This variability undermines trust and predictability in the permitting process.

The current Minnesota DNR Permitting and Reporting System (MPARS) lacks detailed project-specific status tracking and guidance, making it difficult for both applicants or DNR staff to understand application status, responsibilities, and next steps.

There is insufficient early involvement of technical experts and inadequate internal coordination within the DNR to identify and address environmental concerns at the outset of the permitting process. This leads to late-stage surprises, shifting requirements, and adversarial experiences for applicants.

As political subdivisions of the State of Minnesota, watershed organizations are required to have a state-approved Watershed Management Plan (WMP). The WMPs are reviewed by the DNR, MPCA, and other state agencies. Projects identified in these WMPs are eligible for grant funds and bonding dollars. Comments from state agencies on the plans are addressed in the WMP approval process, yet these plans are not considered as acceptable analysis in the permitting process.

In late October, I met with DNR Commissioner Strommen and made a request for DNR's determination of permit application completeness in 30 days. On November 15, DNR leadership conveyed to me that they have held an internal meeting at which the need to have a determination of completeness made

and communicated within 30 days was emphasized. A meeting to learn more about the DNR's internal discussion and what that means for our members is scheduled for mid-December.

In 2024 and 2025, Minnesota Watersheds has adopted resolutions that address the need for revisions to Minnesota Statutes 15.992, 84.027, and 116.03 to separate the determination of a complete application from review of for compliance standards, to develop consistent permit application standards for all state agencies, and to give deference to accept existing WMPs.

Minnesota Watersheds will continue to meet with state agencies and legislators to develop a process that ensures permit reviews are conducted in a predictable, transparent, and consistent manner. A bipartisan effort for legislative permitting reform, supported by DNR and MPCA, is the hoped for result.