

July 2, 2020

Members of the Minnesota Clean Water Council:

Thank you for the opportunity to provide comments on the Clean Water Council's policy proposal regarding mandatory well testing at property transfer.

Minnesota Realtors® is the largest professional trade association in the state with over 20,000 members engaging in all aspects of the real estate transaction. Our members work with buyers, sellers, and those aspiring to buy, every day.

Minnesota Realtors® agrees with the goal of ensuring that ALL Minnesotans have access to clean water.

However, we disagree with the narrow approach the Council is considering with respect to well testing. MN Realtors® opposes unfunded mandates on buyers and sellers in a real estate transaction as a substitute for finding comprehensive solutions to statewide issues, such as drinking water quality, that impact all Minnesotans.

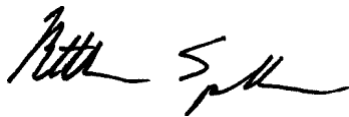
An unintended consequence of mandating well testing at property transfer rather than developing a comprehensive statewide strategy is that property owners may think of well testing as something that only needs to happen if or when the property is sold. Also, relying on the real estate transaction to address well testing will not increase the frequency of well testing at properties where the owners never move.

According to the federal Environmental Protection Agency, property owners should test their wells annually and households with children, elderly adults, or someone who is pregnant, should test more frequently. ([EPA Guidance on Well Testing](#))

Although Minnesota Realtors® opposes a well testing at property transfer mandate, we would be interested in exploring a partnership with state agencies, local units of government and other stakeholders to promote comprehensive well testing statewide. We believe this approach, emphasizing the responsibility of all property owners and not just buyers/sellers, to maintain their private wells would produce better environmental and public health outcomes than only focusing on those in a real estate transaction.

Again, thank you for the opportunity to submit comments on behalf of Minnesota Realtors®.

Sincerely,



Matt Spellman, Director of Political Affairs
Minnesota Realtors®