

March 3, 2025

Dear Chair Heintzeman and members of the committee,

I am writing to express my strong opposition to the proposed carve-outs of Amara's law contained in HF81 and HF1627. When Amara's law passed in 2023, it made Minnesota a leader in protecting the environment, and our citizens, from the well-documented toxic effects of PFAS "forever chemicals." This law passed with strong bi-partisan support, and is protecting both our natural resources, and the people who call Minnesota home, as it was intended to do.

As the spiritual leader of 15,000 Minnesota Episcopalians, I believe, along with other Christians throughout Minnesota, the nation, and around the world, that the primary purpose of human life is to tend and keep the world that God has made, and entrusted to our care. Knowingly allowing chemicals that do irreparable damage to that world, and to God's children who live in it, is unnecessary, immoral, and offensive to anyone who claims to care about Minnesota and its citizens.

As a Minnesota Episcopalian herself, Amara Strande knew this, and her efforts drew together legislators and citizens from across the political spectrum in a season when bipartisan cooperation is almost unheard of. Banning PFAS in Amara's law is a testament to her leadership, our commitment in Minnesota to protect one another and our children, and to our shared love of the beauty of the land we call home.

I am proud to follow Amara's lead and legacy. The two bills that seek to undo much of what we have achieved will guarantee Minnesotans continue to die from the effects of PFAS, and it will put future generations' ability to enjoy the magnificent natural beauty of our waters in jeopardy. I urge you to do what we know is both scientifically and morally right, and what is in the best interests of our children and our future, and defeat HF81 and HF1627.

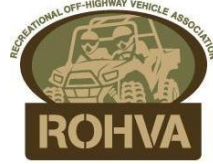
Sincerely,



Rt. Rev. Craig W. Loya
X Bishop, Episcopal Church in Minnesota



**MOTORCYCLE
INDUSTRY
COUNCIL**



March 3, 2025

The Honorable Josh Heintzeman
Chair, House Environment and Natural Resources Finance and Policy Committee
658 Cedar Street
Centennial Office Building, 2nd Floor
St. Paul, MN 55155

Re: Support for HF 81

Dear Chair Heintzeman:

The Motorcycle Industry Council (MIC)¹, the Specialty Vehicle Institute of America (SVIA)², and the Recreational Off-Highway Vehicle Association (ROHVA)³ strongly support HF 81, which excludes OHVs, snowmobiles and electric-assisted bicycles from the “juvenile product” definition for purposes of the PFAS ban.

Youth OHVs Powered for Children

Youth OHVs are specifically sized and powered for children. While banning PFAS in children’s products is intended to eliminate potential health risks associated with exposure, the current ban on youth-sized OHVs creates a much more immediate health risk due to the potential for children to then operate adult-sized OHVs. The U.S. Consumer Product Safety Commission (CPSC) discussed the risks associated with lead exposure from youth ATVs pursuant to the passage of the Consumer Product Safety Improvement Act, which banned certain limits of lead in children’s products. Youth ATVs were subsequently excluded from such lead limits by P.L. 112-28 in part due to CPSC’s statement that banning youth ATVs would pose a **“serious and immediate risk of injury or death” for children under 12 who would instead ride larger and faster adult-size ATVs.** (See 74 Fed. Reg. 22154.) PFAS is currently necessary in parts such as gaskets, o-rings, tubing, and other components that are exposed to high heat and to complex chemical blends in fuels and other fluids. These are not parts that would be in regular contact with a child’s mouth or skin and therefore would not put a child at risk.

In 2024, California passed AB 347 to clarify that juvenile products mean a specific list of baby and toddler products. Colorado’s juvenile product definition also includes a specific list of baby and toddler products and specifically excludes internal components of juvenile products; Maine excluded all motor vehicles from their PFAS law last year; and just last month the Minnesota Pollution Control Agency excluded youth OHV electronics and internal engine parts from their

¹ The Motorcycle Industry Council (MIC) is a not-for-profit, national trade association representing several hundred manufacturers, distributors, dealers and retailers of motorcycles, scooters, motorcycle parts, accessories and related goods, and allied trades.

² The Specialty Vehicle Institute of America (SVIA) is the national not-for-profit trade association representing manufacturers, dealers, and distributors of all-terrain vehicles (ATVs) in the United States. SVIA’s primary goal is to promote safe and responsible use of ATVs.

³ The Recreational Off-Highway Vehicle Association (ROHVA) is a national, not-for-profit trade association formed to promote the safe and responsible use of recreational off-highway vehicles (ROVs – sometimes referred to as side-by-sides or UTVs) manufactured or distributed in North America. ROHVA is also accredited by the American National Standards Institute (ANSI) to serve as the Standards Developing Organization for ROVs. More information on the standard can be found at <https://rohva.org/ansi-standard/>.

law's implementation until 2032. However, some parts such as fuel tubes are on the outside of an engine and there may be the need for PFAS in other parts of the vehicle such as chrome plating. These are not parts that children would be putting in their mouths and pose little if any risk to children. We urge Minnesota to amend the juvenile product definition to specifically exclude entire youth OHVs from the scope of the ban, as is done in HF 81, ban rather than parsing out individual parts and components.

Non-polymer vs. Polymer PFAS

When introducing PFAS legislation, it is essential to consider the differences between non-polymer and polymer PFAS. Across the country, there has been a casual use of the term "PFAS" and most legislation does not take into consideration that different types of PFAS have different properties and therefore have different impacts on a consumer's health and the environment. The powersports industry understands the desire to address those PFAS that easily enter the environment and can bioaccumulate; however, the currently unavoidable use PFAS in powersports are polymerized and have very low risk of entering the environment or your body.

The type of PFAS used in motorized vehicles are fluoropolymers (polymerized PFAS). According to a [2021 OECD report](#), "the term 'PFASs' does not inform whether a compound is harmful or not, but only communicates that the compounds under this term share the same trait for having a fully fluorinated methyl or methylene aliphatic carbon moiety." In the wake of nearly impossible implementation of their overly broad PFAS law, Maine recently passed sweeping legislation (LD 1537/SP 610) to amend the law and **exclude several categories of products - including motor vehicles, motorcycles, all-terrain vehicles, and recreational off-highway vehicles - from their PFAS in products ban.**

Fluoropolymers are used, and are essential, in motorized vehicles for fuel and electric systems, powertrains, brakes, semiconductors, and cables and wires. This type of PFAS is critical to the system's safety, increases the service life and lower maintenance costs for consumers, results in better fuel economy and reduced emissions, and enables use of alternative fuels and power storage batteries. Fluoropolymers do not pose a risk to human health or the environment as they are not bioavailable, not water soluble, not mobile, and do not bioaccumulate⁴.

There should be differentiation made between the types of PFAS and **fluoropolymers and fluoropolymer applications should not be restricted.**

We strongly urge the passage of HF 81. Should you have any questions, please contact me at 703-416-0444 ext. 3202.

Sincerely,



Scott P. Schloegel
Senior Vice President, Government Relations
Motorcycle Industry Council
Specialty Vehicle Institute of America
Recreational Off-Highway Vehicle Association

⁴ [Henry et al. 2018](#), [Korzeniowski et al. 2022](#)



UP TO SPEED

NEWS, NOTES, INSIGHT AND MORE FROM THE MOTORCYCLING UNIVERSE

Kirra Holland and her dad Brandon Holland at the Nemadji State Forest in Holyoke, Minn. Opposite page: Kirra competing in hillclimb, flat track, hare scrambles and motocross meetings.



EIGHT IS ENOUGH!

Vowing to race eight disciplines in 2024, 11-year-old Kirra Holland enjoyed a jam-packed year of motorcycle discovery

BY KEATON MAISANO
PHOTOS: BRANDON HOLLAND

Kirra Holland knew she *didn't* like trees. But what the 11-year-old motorcyclist didn't know was what she *did* like, so she dedicated the 2024 racing season to finding that out. And the best way to do that? Sample each discipline by racing all genres her district had to offer.

With a grandfather who was an Expert-level open-class motocross rider in the 1980s and a father that races in District 23 Amateur Riders Motorcycle Association (ARMCA) off-road competitions, Kirra was destined for the motorcycle lifestyle. But while

she found her way onto two wheels — learning to ride a peewee around 4 years old — she did not follow in her father's tire tracks.

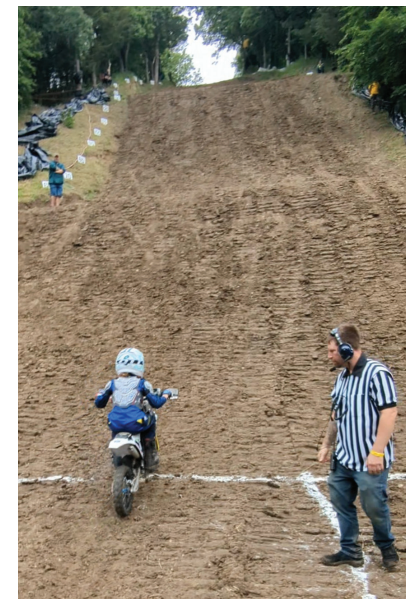
"I was going to try and get her into off-road racing like I did," Brandon Holland, Kirra's father, said, "but she did not like trees. She's not like me at all. I love being in the woods and racing through the woods, but she did not like it. My dad doesn't like riding in the woods, either, so we were like, 'We need to figure out what Kirra likes to do.'"

At the 2022 District 23 enduro banquet, club President Rex Greenwald challenged the crowd to race all eight

disciplines the ARMCA had to offer. Looking for her niche in the motorcycle world, Kirra took the challenge to heart and embarked on the journey to sample every discipline.

The journey began with back-to-back race weekends at the Grantsburg motocross track in Wisconsin. The second discipline up on the schedule was one Kirra had anticipated more than any other: flat track.

Participating in the Jacks of Spade youth program, Kirra rode a fully prepped flat-track racebike loaned to her by Jake Rehberger and his dad Rob, and she checked that experience off her list.



"It was like as small as a peewee bike, and all the other people were on 85s," Kirra said. "Everyone was going really fast. I probably got lapped a couple times, but otherwise it was pretty fun."

Three of the next four disciplines would bring Kirra face-to-face with adversity, starting with a fouled spark plug on her TC65 at the RVER Huntersville Enduro. But despite the

ing task when she looked to tackle the hillclimb event. As Kirra stared up at the big hill that would host the event, she considered abandoning her eight-discipline journey.

"I was really, really scared," Kirra said. "I was thinking about backing out. My dad said, 'Are you sure you want to do this?' I told him I have to. I have to finish all of them."

Despite the moment of doubt, Kirra competed in the event, and while her bike didn't make it to the top of the hill that day, she inched closer to summiting the all-discipline mountaintop.

In the hare scrambles leg of her quest Kirra was forced to face her hatred of racing among the trees head on, a task she may have taken



too literally, as she hit a few and tumbled off her bike.

"That was another reason why I don't really like trees," Kirra laughed. "I was passing these little kids, and then I hit the trees and hurt my finger."

While the pursuit of eight disciplines in one year was a heavy focus, Kirra and Brandon made sure to take time to pause and give back to the motorcycling community. Volunteering at the Akeley Enduro as a Paul Bunyan Forest Rider, Kirra helped clear the 50cc track and pre-rode the 65/85cc course — overcoming being chased by grouse attracted to the sound of a four-stroke and the occasional bear jumping out on the trail.

In the homestretch of completing the discipline octet, Kirra rode as a

passenger with Brandon for the road ride and dual-sport events, both of which required a rider to have a motorcycle permit to compete on their own. And thanks to the rescheduling of the Kato Cycle Club Trail event to a later date, Kirra was able to achieve her goal of eight disciplines in 2024.

"[Riding all the disciplines] was like a challenge to find what I wanted to do most," Kirra said. "At the start of the summer, I really wanted to do flat track, and then at the end I changed and wanted to do moto."

With no trees in sight, Kirra will turn her focus to motocross and supercross racing in 2025. For Brandon, Kirra's journey of discovery contains a lesson for all motorcyclists.

"I think the biggest takeaway, not just looking at her specifically but at our whole family lineage, is that you don't know what you want to do until you try it," Brandon said. "Like, my dad was a motocross rider, but I didn't want to ride motocross. Then I found my niche in enduros and off-road."

"Then when it was Kirra's time...



unfortunate break, Kirra said her dad kept the mood light.

"He was just laughing the whole time," Kirra said. "He was trying to make me feel better. He wasn't that nervous, but I was!"

Following a fun experience at a supercross race at Motokazie in Jordan, Minn., which marked the fourth discipline of the year, Kirra faced a daunt-

From: Steve Mullaney <[REDACTED]>
Sent: Saturday, March 1, 2025 1:26 PM
To: Amy Zipko <[REDACTED]>
Subject: Written Testimony for HF81 and HF1627

Dear Committee Members - I'm writing in opposition to HF81 and HF1627. These are bills that would allow more PFAS products into the State of Minnesota. This would result in less safety and more sickness for everyday Minnesotans. Minnesotans from all walks of life came together to pass Amara's Law -- a law that provides comprehensive protections from PFAS. As you know, this bill was named in honor of Amara Strande who died as a result of cancer that was connected to exposure to PFAS. This law has just come into effect and now is not the time to weaken it. Every day we learn more about PFAS and every day we learn about how we need to protect our communities from PFAS exposure in order for them to remain healthy and safe. I ask the committee to reject these bills and commit itself to making sure that Minnesota is a state where we are monitoring PFAS, cleaning up PFAS from the environment and protecting future generations from unnecessary exposure to PFAS.

Please vote no on HF81 and HF1627.

Sincerely,
Steve Mullaney
University Episcopal Community, Executive Director & Chaplain



Minnesota
Environmental
Partnership

March 3, 2025

Minnesota House Environment and Natural Resources Finance and Policy Committee
Chair Josh Heintzeman

Dear Chair Heintzeman and members,

On behalf of the Minnesota Environmental Partnership and the organizations listed below, I would like to express our coalition's strong opposition to proposed carve-outs to Amara's Law, Minnesota's nation-leading legislation to protect our state's water and people from PFAS "forever chemicals." This law, which won bipartisan support in 2023, is popular, effective, and working as intended, and should not be rolled back.

More than any other state in the nation, Minnesota knows the costs - to our health, to our environment, and to our state's finances - of PFAS pollution. In 2023, legislators heard testimony from those harmed by these carcinogenic chemicals, including cancer victim Amara Strande, in whose honor the law was named. Strande was affected by the PFAS plume from a 3M waste dump in the East Metro, but the problem is not contained to her area of the state. Communities across Minnesota, including Duluth, Bemidji, and Alexandria, are wrestling with the costs of PFAS contamination in their water supplies.

PFAS substances do not break down naturally in the environment - this is the reason for their "forever chemicals" nickname. Over time, they build up in our blood and bodies. Cleanup and treatment are possible, but expensive. The only long-term solution to this problem is to phase out PFAS and phase in alternatives. We can't effectively accomplish that if we leave the door open for industries to claim more and more exemptions.

HF 81 would exempt off-highway vehicles, snowmobiles, and an electric-assisted bicycle from the ban on children's products that intentionally contain PFAS. Outdoor recreation is important to Minnesota, but creating this exception to favor a particular industry is not good policy on PFAS. Parts of these products will end up in Minnesota's waste stream and continue to contaminate our groundwater and our bodies. Manufacturers should instead find solutions that do not introduce more of these forever chemicals into the environment.

HF 1627 would exempt commercial and industrial products from being defined as "products under PFAS restrictions, creating a gaping loophole for continued PFAS contamination in Minnesota. It would also push back the deadline for manufacturers of products that include intentionally added PFAS to provide critical information to the state from 2026 to 2028. This delay may benefit some manufacturers, but only at the expense of Minnesotans' ability to protect our health.

We urge you to preserve the critical victories Minnesota has won in the fight to protect our people from PFAS. We ask that you oppose HF 81, HF 1627, and any further attempts to reverse these vital protections.

Sincerely,



Steve Morse
Executive Director

Submitted on behalf of the organizations listed below.

Bicycle Alliance of Minnesota
Clean Water Action Minnesota
Climate Land Leaders
CURE
Environmental Working Group
Eureka Recycling
Izaak Walton League Minnesota Division
League of Women Voters Duluth
League of Women Voters Minnesota
League of Women Voters Upper Mississippi River Region*
Lutefisk Technologies, Inc.*
Minnesota Center for Environmental Advocacy
Minnesota Interfaith Power & Light
Pollinator Friendly Alliance
Renewing the Countryside
Roots Return Heritage Farm LLC*
Saint Paul Bird Alliance
Sustainable Farming Association
Vote Climate
WaterLegacy

**denotes non-MEP member*

March 3, 2025



Minnesota House
Environment and Natural Resources Committee

RE: HF 81 & HF1627

Dear Chair Heintzeman and Members of the Committee,

On behalf of the Minnesota Zero Waste Coalition and the organizations listed below, we strongly oppose proposed carve-outs to Amara's Law, Minnesota's landmark legislation designed to protect our water, environment, and public health from PFAS ("forever chemicals"). Enacted with bipartisan support in 2023, Amara's Law is a critical step forward in addressing PFAS contamination. The proposed rollbacks in HF 81 and HF 1627 would undermine the law's effectiveness and the progress we've made in combating PFAS pollution.

One of the most concerning aspects of PFAS pollution is its presence in the waste stream. When products containing PFAS are discarded, whether in landfills or incinerators, they continue to contaminate soil, water, and air. As members of the MN Zero Waste Coalition, we recognize that the best way to mitigate this damage is by preventing PFAS from entering the waste stream in the first place. By passing laws that restrict PFAS use in consumer goods, we can stop further contamination at its source.

HF 81 would carve out exemptions for certain products, including off-highway vehicles, snowmobiles, and electric-assisted bicycles, from the ban on PFAS in children's products. This loophole poses a direct threat to our environment by allowing more PFAS to enter our waste stream. These products, once discarded, will continue to leach toxic chemicals into Minnesota's soil and water. We cannot afford to introduce more PFAS into the waste stream, and manufacturers should be required to develop safer alternatives that do not perpetuate this dangerous contamination.

Similarly, HF 1627 creates additional exemptions for commercial and industrial products, which would be allowed to bypass PFAS restrictions. This bill also delays the requirement for manufacturers to disclose the use of PFAS in their products until 2028, effectively pushing back critical protections for Minnesota residents. These delays and exemptions not only slow down our ability to address PFAS contamination but also create long-lasting consequences for our communities.

Minnesota has worked hard to become a leader in the fight against PFAS pollution, but this progress is at risk. The proposed carve-outs in HF 81 and HF 1627 represent a step backward in our efforts to protect our health, environment, and water resources. We urge lawmakers to reject these harmful amendments and any future attempts to weaken these essential protections.

Thank you for your consideration of our comments.

The following Minnesota Zero Waste Coalition Members & Partners sign-on to this letter:

Beyond Plastics Greater Mankato Area

Climate Generation

Coalition for Plastic Reduction

Elder Climate Action Twin Cities

Eureka Recycling

Mankato Zero Waste

Minnesota Center for Environmental Advocacy

MN350 Action

Northeast Metro Climate Action

Recycling Electronics for Climate Action

ALL DISCIPLINES

BY: BRANDON HOLLAND



Have you ever wondered what it's like in all 8 disciplines that ARMCA D23 offers?

Well, 11 year old Kirra Holland did. At the 2022 Enduro Banquet, Rex Greenwald issued a challenge that was not taken lightly. "If someone competes in all of the disciplines he would issue them a special trophy for that accomplishment". With a Dad that competes in D23 ARMCA Off-Road races and a Grandfather that was a Motocross racer in '80s,

she couldn't quite decide which path was right for her. All during the 2023 season she would discuss often how she wanted to try Flat Track because trees and jumps weren't really her favorite at the time. Remembering Rex's challenge, a plan was formed: In the 2024 season she would try to be one of the first to complete the "All Disciplines" Trophy.

The season started with 2 back to back race weekends at the Grantsburg motocross track. This was the first time she had ever raced in any discipline, but being a Straight Arrows club member she was somewhat familiar with the track, which made for an easier transition into the competition environment. It was obvious pretty quickly though that her klx110 was going to be a little too heavy for her so a deal was struck with another club member for a TC65 which would prove to be much more manageable.

After talking about it all the previous summer Kirra was overly joyed when the Jacks of Spade announced they were running their Youth program for another season! Having access to a fully prepped flat-track specific race bike provided by Jake Rehberger and his dad Rob was one of the key components to make the run at doing the All Disciplines possible. With the guidance of Jackie Reiss and Jake on race day she was able to fulfill what had been one of her main goals she wanted to achieve.

The third discipline she attempted was the RVER Huntersville Enduro which is commonly known in the Enduro world as one of the easier enduro's to start out on. She had only briefly ridden the TC65 one time before that race, so the learning curve of a 2 stroke and clutch caught up with her quickly by fouling a spark plug. Her determination was only fueled further though with this mishap.



Although not under the ARMCA umbrella, Kirra's next discipline to try was a supercross race at Motokazie in Jordan. Having another friend on a KX65 (Anchor Skuster) it allowed her to watch how a 65 could go on the same track and over the same jumps that the big bikes do! At this race, she was really starting to get the clutch and shifting figured out.

One of the most mentally challenging disciplines for her was where she headed next, and that was a hill climb. Staring up that big hill she wanted to back out. But with the thought of the "All Disciplines trophy" in the back of her brain, she dropped the clutch and tried her best to let the bike claw its way to the top of the hill. The bike clawed and got way more traction than she assumed and flipped the bike right as she was about to make the first transition. She wanted redemption for that run but unfortunately, the day was cut short by an incredible rainstorm.

Harescrambles were up next! The Trollhaugen Harescramble was where she decided to give it a try. The beginner class is a great way for kids to start in off-road disciplines because it provides an easier transition into the competition environment by starting in the last row and not getting tangled up with some of the very fast 65/85 kids. Halfway through her race, her arch nemesis trees got the best of her. She played pinball with a few before taking a tumble and getting help back to the race start by Bert Swygman.

After getting 5 disciplines done it was time to give back. As a Paul Bunyan Forest Rider Kirra assisted with working the Akeley Enduro. She cleared the whole 50cc track of face slappers while her dad arrowed and ran the DR. Then she pre-rode and helped arrow the 65/85 course to expose any areas where the little tires might have some difficulty and needed course improvement. On race weekend, she worked checks for both youth races and the adult races, proving to be particularly useful in



redirecting bikes that attempted to go off-course mid-transfer.

2 of the last 3 disciplines are the toughest for an 11-year-old to achieve. Road Ride and Dual Sport both require a motorcycle permit which is difficult for someone who can't even get a driver's license yet. However, the TCTR NSAR (Twin City Trail Riders North Shore Adventure Ride) allows you to register your passenger as a participant. Luckily her dad has a motorcycle permit and a 125cc scooter that doubles as an adventure bike haha. The Flood Run - Road Ride will be achieved as a passenger on the Harley (one of her favorite bikes). With the cancellation of the Theilman trail ride and the rescheduling of the Kato Cycle Club Trail, she is hoping for redemption on climbing big hills.

As the motorcycle season comes to a close, we hope this story inspires you to also attempt the "All Disciplines" Trophy or at least another discipline outside of the one you currently participate in. Her story proves that it doesn't matter if you're 11 years old or 70 years old, it's never too late to cross over and try something new on a motorcycle you've been thinking about in this great district we call ours. Kirra and her dad would also like to extend a big thank you to all the great district members who continue to put on great events across "all disciplines" and hope you continue the great work you've been doing for years to come.

