FRIENDS OF THE MISSISSIPPI RIVER

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18 July 2025

Minnesota Pollution Control Agency
Attn: Eva Holupchinski and Faith Krogstad
520 Lafayette Road N
St. Paul, MN 55155-4194

Greetings Ms. Holupchinski and Ms. Krogstad,

Thank you for the opportunity to provide written comments on the 2025 update to the Minnesota Climate Action Framework.

Friends of the Mississippi River is a 501(c)3 non-profit organization dedicated to protecting and restoring the Mississippi River and its watershed in the Twin Cities. We believe it is critical that Minnesota pursue economy-wide decarbonization strategies that also support water quality, biodiversity, and healthy ecosystems.

Therefore, we respectfully request that you make the following amendments to the Minnesota Climate Action Framework:

- **1.2.1 Reduce the carbon intensity of transportation fuels.** Biofuels will be a widely utilized near-term tool for decarbonizing the transportation sector. However, a poorly managed transition that is overly reliant on dominant cropping systems could have unintended consequences for water quality and biodiversity. We recommend the addition of the following action steps:
    - Prioritize scaling the lowest-carbon biofuels that support water quality and biodiversity, such as winter-hardy oilseeds.
    - Include sustainability guardrails for biofuels that are sufficient to reduce emissions across the full lifecycle while minimizing adverse environmental impacts, such as land conversion, water quality degradation, and reduced biodiversity.
    - Evaluate the carbon intensity of fuels using lifecycle analyses with science-based indirect land use change (ILUC) values.

- **1.2.1.1 Develop a clean transportation fuels standard to incentivize increased investment in a broad portfolio of cleaner fuels, including advanced biofuels, renewable natural gas, other renewable fuels, sustainable aviation fuel, electricity, and charging infrastructure.** A clean transportation standard should include a carbon intensity reduction schedule that aligns with statewide climate goals while also prioritizing fuels that have the lowest greenhouse gas emissions and greatest environmental benefits. We suggest the following language:
    - Develop a clean transportation fuels standard that aligns with statewide climate goals to incentivize increased investment in a portfolio of cleaner fuels, including advanced biofuels, sustainable aviation fuel, electricity from wind and solar, and charging infrastructure.
- **1.2.1.2 Follow the Governor's Council on Biofuels recommendations.** We strongly oppose this action step. The Governor's Council on Biofuels report recommends spending nearly $800 million to upgrade gas stations to allow for higher ethanol blends. This level of investment is incompatible with state resource constraints and would distract from higher priority investments in vehicle electrification.
- **2.3.1.1 Increase incentives and expand markets for practices such as cover crops, conservation tillage, diverse crop rotations, buffers, shelterbelts, hedgerows and perennial crops that sequester carbon and increase resilience by restoring soil health.** We strongly support this action step and suggest explicitly connecting this action to the Developing Markets for CLC Crops program and Forever Green Initiative already in place. This defines the programs as critical to the success of the action, in the same way that the MAWQCP program is defined as critical to action 2.3.3.5. We suggest the following language:
    - Increase incentives, expand markets, and support research for practices such as harvestable cover crops, conservation tillage, diverse crop rotations, buffers, shelterbelts, hedgerows and perennial crops that sequester carbon and increase resilience by restoring soil health through programs such as the Forever Green Initiative and the Developing Markets for CLC Crops program.
- **2.4.1 Manage agricultural landscapes to minimize nitrogen runoff and pollution.** Minnesota's draft 2025 Nutrient Reduction Strategy positions continuous living cover as a primary implementation strategy to reduce nitrogen runoff and pollution. We recommend aligning this sub-initiative with the Nutrient Reduction Strategy by adding the following additional action step:
    - Promote market-based continuous living cover practices, including perennial cover and annual crops that keep the soil covered year-round.
- **2.4.1.2 Protect, restore, and enhance perennial cover in priority Drinking Water Supply Management Areas.** We recommend being more inclusive of the suite of continuous living cover cropping systems, rather than only perennial cropping systems:

    - Protect, restore, and enhance continuous living cover cropping systems that keep the soil covered year-round in priority Drinking Water Supply Management Areas.

- **2.5.1 Strengthen sustainable agricultural production systems and develop markets for climate-benefitting products.** Winter-hardy oilseeds are an emerging crop that have strong potential for use as a low-carbon biofuel feedstock while reducing nitrogen runoff and supporting biodiversity. We suggest the addition of the following action step for winter oilseeds that mimics action 2.5.2.2 for emerging forest products:

    - Stimulate markets for emerging winter-hardy oilseeds, such as biofuels, that can reduce greenhouse gas emissions by providing a lower-carbon alternative to conventional biofuels and fossil-fuels.

- **2.5.1.1 Invest in new markets and supply chains for perennial crops and harvestable crops that keep soil covered year-round.** We strongly support this action step and suggest explicitly connecting this action to the Developing Markets for CLC Crops program already in place. This defines the program as critical to the success of the action, in the same way that the MAWQCP program is defined as critical to action 2.3.3.5. We suggest the following language:

    - Invest in new markets and supply chains for perennial crops and harvestable crops that keep soil covered year-round through programs such as the Developing Markets for CLC Crops program.

- **2.5.1.2 Support and expand genetic and agronomic research and market/supply-chain development for crops that increase carbon sequestration, require less water, reduce nitrogen loss, and improve landscape resiliency and adaptation.** We strongly support this action step and suggest explicitly connecting this action to the Forever Green Initiative already in place. This defines the program as critical to the success of the action, in the same way that the MAWQCP program is defined as critical to action 2.3.3.5. We suggest the following language:

    - Support and expand breeding and agronomic research and market/supply-chain development for crops that increase carbon sequestration, require less water, reduce nitrogen loss, and improve landscape resiliency and adaptation through programs such as the University of Minnesota's Forever Green Initiative.

- **2.5.1.5 Promote agricultural feedstocks for sustainable aviation fuel.** Agricultural feedstocks vary widely in their environmental and climate impacts. A SAF industry that is overeliant on summer annual cropping systems could diminish water quality and biodiversity. SAF strategy must prioritize the most sustainable biofuel feedstocks, such as winter-hardy oilseeds. We suggest following these guiding principles and using the following language:

    - 2.5.1.5 Promote agricultural feedstocks for sustainable aviation fuel that have the lowest lifecycle carbon emissions, greatest environmental co-benefits, and do not result in land conversion, such as winter-hardy oilseeds.

- **6.2.2.1 Support low-carbon fuels made in Minnesota or with Minnesota products, such as wood waste, winter oilseeds, clean hydrogen, solid waste, and captured carbon, through existing policies like tax credits, production payments, and blending standards, and creation of new programs to increase production in Minnesota.** We support this action item and encourage policies that support the lowest-carbon fuels.

Thank you for your time and consideration,

Meghan Anderson

Biofuels Policy Manager
Friends of the Mississippi River