

January 28, 2025

Commissioner Katrina Kessler
Chair, Climate Change Subcabinet
Minnesota Pollution Control Agency
520 Lafayette Road N
St. Paul, MN 55155-4194

Re: *Comments on Ideas for Climate Action (Minnesota Climate Action Framework Update)*

Comments submitted via update portal

Dear Commissioner Kessler:

On behalf of The Pew Charitable Trusts (Pew), thank you for the opportunity to comment on the [Minnesota 2025 Climate Action Framework - Ideas for Climate Action](#) and [Greenhouse Gas \(GHG\) forecasting technical support document](#), released on December 18, 2024 as part of the update of the 2022 Minnesota Climate Action Framework (CAF). Now more than ever, states play a critical role in both mitigating and addressing the impacts of climate change to people and nature, and we applaud Minnesota's desire to strengthen its climate ambition via the CAF update process.

Pew's [U.S. Conservation program](#) advances common sense solutions that address the impacts of a changing climate on nature and people, in collaboration with policymakers, Tribes, and stakeholders. Pew's interests relative to the CAF update are:

- advancing protection, restoration and resilience of Minnesota's peatlands as a nature-based strategy for mitigating and adapting to climate impacts (CAF Goal 2); and
- helping Minnesota identify ways to become more resilient to climate-related risks and disasters such as fires, floods and drought (CAF Goal 3).

Leveraging peatlands as a nature-based strategy for climate (Goal 2)

Peatlands globally are recognized as irrecoverable carbon hotspots, meaning that their significant carbon stores are vulnerable to release and, if lost, could not be restored by 2050,

when the world must reach net-zero emissions to avoid the worst impacts of climate change. Minnesota's peatlands are nationally significant carbon sinks. Although approximately 800,000 acres were drained over the last century, at least 6 million acres of peatlands remain, storing approximately 37% of all terrestrial carbon in the state.

However, [research conducted in Minnesota](#) suggests the stability of this enormous carbon pool may be at risk with rising temperatures, with the potential of converting from a net carbon sink to a source of GHG emissions in the near future. In addition, while intact peatlands are currently a net GHG sink, drained peatlands represent Minnesota's fourth largest source of GHG emissions, and even partially drained peatlands produce roughly 38,000 MT GHG emissions annually.

Accordingly, peatlands are critical for Minnesota's net zero goal on both sides of the GHG ledger - restored and intact peatlands will contribute to reducing and avoiding GHG emissions whereas degraded and destroyed peatlands will increase GHG emissions. With respect to climate resilience, they also can play a dual role: restored and intact peatlands can help increase water storage capabilities of the state's natural and working lands, reducing the impacts of severe flooding, drought and wildfire, whereas degraded peatlands can contribute to lowland flooding and increase fire severity.

We applaud Minnesota's recognition of the climate importance of its peatlands, including launching a [Peatland Resilience Initiative](#) in 2024. With respect to the CAF update, we recommend increasing this ambition by:

- Including best available science on projected emissions associated with increased warming from peatlands in the "business as usual" scenario in GHG modeling to account for the impact of carbon losses on achieving net zero by 2050 absent additional action.
- Elevating peatlands as a Framework "priority action" for the Natural and Working Lands goal.
- Setting (or committing in one year to establish) specific activity-based targets and timelines (2030, 2040 and 2050) for peatlands detailing actions that protect, build resilience and restore these landscapes beyond what is included in the current business as usual scenario.
- Bolstering the Peatland Resilience Initiative, including providing capacity and resources for the Initiative to research and implement resilience-building measures for reducing

carbon losses projected to take place due to rising temperatures (this work would be analogous to proactive measures taken in forests to reduce the severity of wildfire as a GHG mitigation strategy).

- Identifying the opportunity and outlining recommended actions for conserving and restoring peatlands for ecosystem service benefits on School Trust Lands.

Taken together, these actions would increase the resilience of peatlands and support durable carbon stocks.

As Minnesota updates CAF Goal 2, it can look to examples from other states that have increased their ambition in the natural and working lands sector, including:

- California: California released its [Natural and Working Lands Climate Smart Strategy](#) in 2022, followed by [Nature-based Solutions \(NBS\) targets](#) in 2024. The Strategy outlines major initiatives while the NBS targets include specific actions and associated acreage amounts that provide a basis for the state to model, analyze and measure climate action on its lands. For wetlands, the state established targets to protect, restore and build resilience on more than 233,000 acres of wetlands.
- New Jersey: In 2024, New Jersey released its [Natural and Working Lands Strategy](#) that includes conservation, restoration and management targets across NWLs for 2030 and 2050, covering over 25,000 acres of wetlands.
- Maine: In 2024, Maine released its updated “[Maine Won’t Wait](#)” sector-wide climate plan, which includes a goal for the NWL sector to increase the total acreage of conserved natural and working lands in the state to 30 percent by 2030.
- North Carolina: former Governor Roy Cooper issued [Executive Order 305](#) in 2024 for the state’s natural and working lands, including ambitious conservation and restoration targets for 1 million acres of forests and wetlands.

Fostering resilience to climate related risks and disasters (Goal 3)

Across the United States, state governments are on the frontlines of responding to and recovering from climate-related disasters and changing climate conditions, and Minnesota is no exception. The CAF acknowledges these challenges including warming temperatures in summer

and winter and increased risk of wildfire with implications for air quality. We commend the state's actions to date – including investment of \$100 million in more resilient infrastructure and expansion of tree canopies to cool communities - and the continued ambition outlined in the Ideas for Climate Action document.

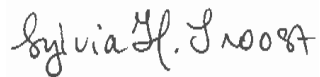
As Minnesota continues to chart a course to more resilient communities, the state might look to examples from peer states advancing similar initiatives to help local governments prepare for a changing climate:

- The Massachusetts pilot of an updated [Municipal Vulnerability Preparedness \(MVP\)](#) grant program from 2023-2024 fills gaps in the original program's planning process, builds on the work communities have done to date, and supports communities with new processes, tools and resources with a focus on building local capacity and addressing social vulnerability. The MVP program has provided support for cities and towns to build resilience to climate change since 2017, and [MVP 2.0](#) marks a thoughtful extension and expansion of the grant program, offering a helpful model for Minnesota.
- The CAF update should consider opportunities for the state to lead through planning, siting, design, operation and management decisions for its own facilities and services to avoid high risk areas, use nature-based solutions, and build to a higher standard to avoid post-disaster repair and reconstruction costs. Minnesota can look to the example of North Carolina's updated [Uniform Floodplain Management Policy for State Property](#), and [NC Executive Order 266](#) that directed this update. New Jersey offers another example where the [Resilient Environments and Landscapes](#) effort to update land resource protection rules and [Inland Flood Protection Rule](#) ensure the highest risk areas are better defined, and that new construction or reconstruction in those areas is built to a more resilient standard.
- The CAF update should evaluate if further formal coordination and interagency leadership focused on disaster resilience and climate adaptation are needed in line with the expanded activities proposed in the Ideas for Climate Action document. Minnesota should consider if a formal, centralized resilience lead and comprehensive, strategic plan are needed to meet ambitious resilience goals, looking to the many models of this approach in peer states. Pew-supported research from the [American Planning Association](#) found:

- o 18 states have guidelines for a standalone statewide resilience plan,
- o 12 states have an official resilience office; and
- o 13 states have a chief resilience officer to coordinate among agencies and act as a go-between with a state legislature, federal resilience programs and local governments.

Please do not hesitate to reach out should you have questions or desire to discuss any of these recommendations in greater detail. Thank you for your efforts on the 2025 CAF update, we look forward to continuing to work with you to support Minnesota's GHG mitigation and climate resilience ambitions.

Sincerely,



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