

Bicycle Alliance of Minnesota • Clean River Partners • Clean Up the River Environment  
Friends of the Mississippi River • Land Stewardship Project  
League of Women Voters Minnesota • Minnesota Community Action Partnership  
Minnesota Environmental Partnership • Minnesota Interfaith Power and Light  
Minnesota Trout Unlimited • MN350 • Sierra Club North Star Chapter

May 2, 2022

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

Re: Minnesota Climate Action Framework process

Dear Commissioner Kessler,

The undersigned organizations would like to thank you and the members of the Minnesota Climate Subcabinet for pledging to conduct an inclusive and engaging process for developing the Minnesota Climate Action Framework. The climate crisis is the most critical challenge Minnesota faces and is deeply interconnected to our other issues, including economic opportunity, racial justice, ecosystem preservation, and the health and safety of our communities and people.

At the same time, our organizations are concerned that this process has issues of design and scope that may result in it falling short of the climate actions needed. As your public information gathering and workgroup sessions continue, we seek assurances that this process will:

1. Be conducted with full transparency, inclusion of diverse community voices, with neutral facilitation, as part of an ongoing dialogue.
2. Align with the internationally recognized science-based goals and timeline of the Intergovernmental Panel on Climate Change (IPCC) to achieve a 45% reduction in greenhouse gas emissions from 2005 levels by the end of the decade.
3. Identify both immediate actions to be taken and longer-term climate action plans that can inform the work and investments of public and private entities.
4. Include mechanisms to guarantee and enforce plans for action.

**1. This framework must be conducted with full transparency and inclusion**

We ask that the engagement processes conducted by the Climate Subcabinet and Advisory Council be more transparent and accessible as we move forward. While we appreciate your efforts to solicit feedback from Minnesotans, as with the Community Conversation on March 16th, we are concerned that this process continues to face challenges in addressing these concerns. We ask that as you move forward you outline precautions to ensure the deliberations of these workgroups and other follow up meetings will be public-facing, and welcome comments and criticism in good faith. When this framework process concludes, Minnesotans should be left with no reason to doubt that the process was fair and open. At each stage, there should be opportunities for organizational feedback about the process.

The process must also more effectively engage all Minnesota communities, especially those most directly impacted by pollution and climate change. This includes ensuring strong representation of Black, Indigenous and communities of color in each step of the process, and conducting robust outreach to members of immigrant communities, Indigenous tribes, young people and communities of color. In order to effectively conduct this outreach, we ask you to collaborate with the organizations participating in this process who have worked to build the necessary relationships with these diverse communities. This outreach and relationship-building should continue beyond the scope of this framework to ensure these communities are meaningfully consulted and their feedback is incorporated into future climate action and policies.

In addition, we need to raise a concern regarding the facilitation of some of the work groups by a non-neutral facilitator. We respect and appreciate Great Plains Institute's participation in the process and many of us partner with GPI in similar spaces, however, as an organization with its own climate policy agenda, we are concerned that it cannot be an impartial facilitator. For this reason, we recommend that an appropriate role for GPI be as an equal participant in the process and not as a facilitator. We believe that for this process to be effective it must be conducted by a neutral party (for example by state agency staff or by a neutral outside consultant) that will fairly represent all ideas generated by participants of the workgroups.

Given the importance of a neutral and independent facilitator, we recommend that funding be made available from state operations to compensate a facilitator going forward.

## **2. This framework must be aligned with the IPCC goals**

Minnesota and the planet face the stark reality that absent dramatic action in line with what internationally recognized science tells us, we will face catastrophic consequences within decades. The IPCC's goals and timeline - a 45% reduction in climate emissions by 2030 to maintain a 1.5°C rise in global temperature - are considered the guiding star for climate efforts around the world, and Minnesota should use them in targeting emissions reductions.

The fact that Minnesota has struggled to meet our 15-year-old state adopted emissions reductions goals should not deter us from listening to current clear science. It is the obligation of Minnesota, the United States, and the world as a whole to cut our emissions at a scale and speed that will provide people and the planet with a livable future. This framework should explicitly identify a zero emissions target as its goal and seek ideas and expertise on how to get there.

## **3. This framework must identify both immediate actions and long-term planning**

While we can appreciate that the limitations of state government and the political cycle can disrupt long-term climate planning, the fact remains that Minnesota must prepare for climate on the scale of both years and decades just as we do for economic and population forecasts. This means that for every decision we make now on permitting, climate investments, and land use, we must consider how consequent emissions or lack thereof will affect our efforts at carbon neutrality ten, twenty, or thirty years down the line.

Each workgroup should work with the assumption that meeting IPCC benchmarks is the goal, and identify how those benchmarks will be met in the near, medium, and long term. Facilitators should recognize that dead end pathways - emissions “solutions” that may reduce, but also prolong the use of fossil fuel infrastructure, lead to stranded assets, and hobble our way to zero emissions - are not feasible.

As an example, the State of Louisiana’s Climate Initiatives Task Force recently made climate action recommendations to Governor John Bel Edwards. These recommendations included a recognition of the specific emissions reductions targets that must be met, a modeled pathway to net zero emissions by 2050, and specific, quantifiable steps to be taken to align with that pathway.

#### **4. This framework must identify guarantees and enforcement of goals.**

As previously stated, Minnesota has set emissions reductions goals before and failed to meet them. Our state government and the businesses and public institutions represented on these workgroups have an obligation to Minnesotans to demonstrate how our promises will be kept. This framework should explicitly seek to identify and create mechanisms to enforce our climate goals and commitments to increase investment should we fall behind on intermediate goals. We know that most Minnesotans are asking for ambitious climate action in good faith, and their faith should be rewarded in turn with solid guarantees that will protect our environment, people and planet. Pledges can be encouraging, but they alone will not stave off disaster.

Our community stands ready to assist the agencies leading the Climate Action Framework process in strengthening engagement, contributing to a more inclusive process, and informing the process with our expertise. We believe that to address the climate crisis our state must continue to develop and maintain a credible engagement process of communities working alongside state agencies. For this reason, we recommend that after this framework process concludes an evaluation of the process be conducted, including of the recommendations that emerged from the working groups, feedback from participants in the process, and identification of further steps that are required. As the Climate Action steps are implemented, this process could serve to maintain both engagement and oversight of the climate actions that are undertaken.

We ask that you commit to a framework aligned with the science, appropriately ambitious in scope, and focused on measures to ensure a bright future for all Minnesotans.

cc:

Commissioner Grace Arnold  
Commissioner Nancy Daubenger  
Commissioner Steve Grove  
Commissioner John Harrington  
Commissioner Jennifer Leimaile Ho  
Commissioner Jan Malcolm  
Commissioner Thom Petersen  
Commissioner Alice Roberts-Davis

Commissioner Roslyn Robertson  
Commissioner Jim Schowalter  
Commissioner Sarah Strommen  
Chair Gerald Van Amburg  
Chair Charlie Zelle