



Minnesota Climate Change Subcabinet

Saturday, November 8, 2025

Dear members of the Minnesota Climate Change Subcabinet,

On behalf of our member organizations and the undersigned groups, the Minnesota Environmental Partnership would like to thank you for the opportunity to submit comments on the update to Minnesota's Climate Action Framework. As recent weather extremes have demonstrated, Minnesota has an increasingly clear need for robust action to achieve carbon neutrality by 2050, especially given federal abdication of responsibility on the issue.

We appreciate the many positive steps proposed in this framework and its thorough identification of greenhouse gas sources and solutions. We would like to propose some key improvements that will make the framework more effective.

1. We hope to see robust metrics for success included in this framework as soon as possible. Our climate goals are achievable, but we will only reach them on the needed timeline by setting specific targets to be met. On key metrics, ranging from how many acres of natural lands we protect to how many vehicle miles traveled we reduce, it is in the state's interest to set goals without delay so that they can inform state policy starting in the near-term. We especially note a clear gap in the framework: the lack of measurable milestones in the Natural and Working Lands chapter. There are ample known metrics that are available now that should be used at this time, and this list can be added to in the future. This approach is strongly preferable to the draft document's suggestion that an annual convening be substituted for actual metrics. With highways, conservation investments, and other infrastructure plans operating on a timescale lasting decades, we cannot afford to delay in setting these targets.

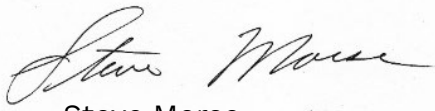
2. We hope to see a strong focus on Continuous Living Cover (CLC) crops and cropping systems in the Big Things Now section and under Natural and Working Lands. CLC crops are a key tool to reduce the climate impact of farming, providing soil health benefits and encouraging reductions in nitrous oxide. At the same time, they support climate resilience on Minnesota's landscape by capturing precipitation throughout the year, redirecting it from potential flooding.

3. We hope to see much stronger language concerning the protection and restoration of Minnesota's peatlands, a major climate problem that can be an invaluable climate action asset. Minnesota has nearly 850,000 acres of partially drained peatlands. They are the second largest source of greenhouse gas emissions from the agriculture sector, ahead of manure and cow digestion. Existing peatlands hold an estimated 4 billion metric tons of carbon, and their further degradation could result in wildfires and catastrophic carbon releases. But as much as dried peatlands are a carbon challenge, restoring them to enable their use as a massive carbon sink is a natural carbon solution.

The Climate Action Framework update draft currently includes mention of planned efforts by DNR and BWSR to restore more than 10,000 acres of partially drained peatlands. That's a step in the right direction, but it represents roughly 1.2% of the state's potential. The framework should include a specific target of restoring at least 50% of these partially drained peatlands to start turning this carbon problem into a carbon asset.

We are encouraged by the tremendous effort that the Climate Change Subcabinet and stakeholders have put into this framework. We urge that it be strengthened and integrated into state decision making as quickly as possible to help ensure Minnesota takes our place as a national and global climate action leader.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Morse", is written over a light gray rectangular background.

Steve Morse
Executive Director

Submitted on behalf of the groups listed below.

Alliance for Sustainability

Bicycle Alliance of Minnesota

Clean River Partners

Climate Land Leaders

EWG

League of Women Voters of Minnesota

Lutefisk Technologies, Inc.*

Lutheran Advocacy - Minnesota

Minnesota Division Izaak Walton League of America

Starry Skies North

Third Act Minnesota

Vote Climate

**denotes non-MEP member*