



Working to protect the Mississippi River
and its watershed in the Twin Cities area.

101 East Fifth Street
Suite 2000
Saint Paul, MN 55101

651-222-2193
www.fmr.org
info@fmr.org

March 28, 2022

RE: Support for Future Fuels Act (H2083DE3)

On behalf of Friends of the Mississippi River, I am writing to express our support for the Future Fuels Act as amended (H2083DE3).

We greatly appreciate Rep. Lippert's strong leadership and willingness to solicit stakeholder perspectives regarding a potential path forward for this legislation.

As amended, the Future Fuels Act can help reduce transportation sector greenhouse gas emissions while addressing the risks to water quality, habitat and agricultural emissions.

In particular, we support several key amendments to this legislation:

1. **Establishment of appropriate GHG reduction goals.** Sect 1, Subd. 2(a) establishes a clean fuels standard that reduces the aggregate carbon intensity of transportation fuels by 25% by 2030, 75% by 2040 and 100% by 2050. This ensures that the Future Fuels Act promotes greenhouse gas reduction in the transportation sector in a responsible and timely manner.
2. **Addressing water quality and soil health concerns.** Section 1, Subd. 6(a)(3-4) allows for additional credit premiums for cropland-derived biofuels produced on acreage utilizing soil healthy farming and continuous living cover cropping systems.

In addition, Section 1, Subd. 6 (a)(2)(ii) prohibits the generation of credits for biofuels from feedstock grown on croplands without at least five consecutive years cropping history as of July 1, 2022.

Together, these measures help ensure that the Future Fuels Act incentivizes farming practices that improve soil health and reduce runoff pollution, while also reducing the risk that the legislation will promote the conversion of natural lands to biofuel crop production.

3. **Forming an inclusive process:** Section 1, Subd. 7 establishes an advisory committee composed of representatives of fuel providers, consumers, rural, urban and Tribal communities, agriculture, environmental and environmental justice organizations, technology providers, and businesses from urban communities that rely on river water as the primary source of drinking water. This ensures adequate stakeholder participation in a subsequent rulemaking process.
4. **Resolving concerns about enhanced oil recovery:** Section 1, Subd. 6 (A)(2)(i) prohibits generation of credits from carbon capture and underground storage of carbon dioxide used for enhanced oil recovery. This ensures that the Future Fuels Act will not incentivize additional fossil fuel extraction.
5. **Promoting winter oilseeds:** There is strong potential for winter annual oilseeds to serve as a feedstock for biodiesel, renewable diesel and aviation biofuels in a clean fuels standard. The use of winter annuals as a feedstock has significant co-benefits for water quality, wildlife and pollinators.

In the event that the Future Fuels Act and subsequent clean fuels standard rulemaking moves forward in Minnesota, it is our hope that all elements of 2083DE3 are incorporated.

Sincerely,

Trevor Russell

A handwritten signature in black ink, appearing to read 'Trevor Russell', with a long horizontal flourish extending to the right.

Water Program Director
Friends of the Mississippi River

