

March 8, 2023

Honorable Erin Murphy
Chair, Senate State and Local Government and Veterans Committee
Minnesota State Senate
3211 Minnesota Senate Building
St. Paul, MN 55155

Dear Chair Murphy, Vice Chair Mitchell, Ranking Minority Member Anderson, and members of the Senate State and Local Government and Veterans Committee,

I am writing to you on behalf of the Union of Concerned Scientists (UCS) regarding the Clean Transportation Standard. UCS is the nation's leading science-based nonprofit putting rigorous, independent science to work to solve our planet's most pressing problems. On behalf of UCS's 6,000+ supporters in Minnesota, we strongly support this policy.

UCS has been engaged with a broad coalition of stakeholders to develop a comprehensive and technology neutral approach to decarbonize transportation fuels in Minnesota. Using a science-based approach that measures each fuel based on its full lifecycle emissions ensures that actors in the fuel supply chain are doing their part to clean up transportation.

UCS supports the Clean Transportation Standard because:

1. **The Clean Transportation Standard will accelerate electric vehicle adoption:** Electric vehicles are growing in Minnesota but need a boost. The Clean Transportation Standard would support electrification of all modes of transportation directly in proportion to their assessed climate benefits. Together with a [Zero Emissions Vehicles](#) standard for vehicles and [utility programs to build out charging infrastructure](#) for both [passenger vehicles](#) and [trucks and buses](#), the Clean Transportation Standard can help accelerate a transition to clean electric transportation. **It is important to UCS that the Clean Transportation Standard includes intent language directing the enacting agency to ensure that the benefits of electrification are equitably distributed, so that all Minnesotans benefit, particularly those underserved or overburdened by transportation pollution.**
2. **EVs are central to transportation decarbonization but must be accompanied by reduced pollution from liquid transportation fuels.** UCS analysis on [low carbon pathways for transportation](#) finds that to reduce emissions consistent with limiting global temperature rise to 1.5 degrees Celsius requires rapid vehicle electrification, which by mid-century could reduce liquid transportation fuel by 84 percent. But to fully phase out petroleum and bring transportation emissions close to zero requires

low carbon alternatives for the remaining liquid fuels, including biofuels, especially for aviation and other hard to electrify applications. Emissions reductions are possible across biofuel supply chains, from better crops and farming practices to lower carbon non-fossil fertilizer production, to reductions in biofuel production emissions and carbon capture and sequestration (CCS) at biofuel production facilities. **It is important to UCS that the Clean Transportation Standard includes safeguards limiting credit for CCS to permanent storage of carbon dioxide and excluding support for carbon capture utilized for enhanced oil recovery.**

3. **The Clean Transportation Standard will ensure that biofuels production gets cleaner:** With advances in technology, biofuel producers have been reducing pollution and getting more efficient, but there are considerable opportunities that have been untapped. Most current biofuel policies focus on increasing biofuel consumption, neglecting the opportunity for biofuel producers to further reduce emissions. The Clean Transportation Standard rewards fuel producers in proportion to the climate benefits their fuel provides, assessed on a full lifecycle basis. This means cleaner biofuels get more support, and biofuel producers have an incentive not just to increase production, but to reduce fossil energy use and emissions per gallon. **It is important to UCS that the Clean Transportation Standard includes incentives for innovative crops and farming systems that recognize the important soil and water quality benefits these crops and practices provide.**

UCS looks forward to working with the legislature and, upon passage, with regulators to develop a practical policy that advances clean transportation, includes safeguards to protect natural lands and provisions to ensure an equitable distribution of benefits from clean transportation.

Sincerely,

Jeremy I. Martin, Ph.D.

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