March 24, 2023

Chair Dibble
Senate Transportation Committee
75 Rev. Dr. Martin Luther King, Jr. Blvd.
Saint Paul, MN 55155

Dear Chair Dibble and Committee Members,

CURE thanks the committee for this opportunity to submit written testimony explaining our concerns with S.F. 2753. CURE is a rural organization dedicated to uplifting rural voices and strengthening rural communities. We agree that rapid, deep decarbonization is necessary across all sectors to achieve the greenhouse gas emissions reductions goals identified by the Intergovernmental Panel on Climate Change, our own state agencies, and this legislature. However, we are concerned that the adoption of policies that lack assurances of comprehensive and transparent emissions accounting will keep us from achieving that goal.

As written, S.F. 2753 proposes the use of either the Argonne National Laboratory's GREET model or the International Civil Aviation Organization's (ICAO) life cycle analysis to establish the lifecycle greenhouse gas emissions of sustainable aviation fuels (SAF) certified by the American Society of Testing and Materials (ASTM). While GREET can be helpful in generating a basic understanding of a process or product's lifecycle emissions, the model does not include critical health and ecosystem externalities such as water pollution from agricultural runoff during the biofuel lifecycle. The ICAO method of assessing the life cycle emissions of sustainable aviation fuels suffers from similar shortcomings. Furthermore, it's not clear from the language of the bill which ICAO method should be used to calculate the lifecycle emission value of an SAF. The ICAO recognizes both a default value—the average estimate of a certain feedstock and processing method's lifecycle emissions value—and the actual value of a specific SAF and process, calculated using the ICAO's methodology.

The problem with choosing a test or default value that excludes these externalities is that it inherently ignores several real and significant impacts of SAF production. To gain a complete picture of how a particular SAF measures up to traditional petroleum-based aviation fuel or a different kind of SAF, we must know how every step of the process impacts all aspects of our environment.

Additionally, CURE is concerned that the bill currently includes language identifying carbon capture and storage (CCS) technology as a way to reduce the lifecycle emissions from the

production process of SAF. CO_2 captured during the production of SAF would almost certainly be transported via pipeline to neighboring states, where Minnesota has no ability to ensure that the CO_2 is in fact being permanently stored. This is especially concerning given that the majority of CO_2 captured today is used for enhanced oil recovery (EOR), which allows for more fossil fuels to be combusted. And, as the state has seen with other projects, the construction and operation of pipelines can be extremely destructive to nearby communities and ecosystems.

CURE believes further consideration of this bill and its precise details is required before it can be included in any omnibus bill. We appreciate the opportunity to submit written testimony on S.F. 2753 and thank the Committee for its consideration of this issue.

Sincerely,

/s/ Sarah Mooradian
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