



# Minnesota Forest Resources Council

Representing: January 26, 2024

Commercial Logging Contractors

Conservation Organizations

County Land Commissioners

Department of Natural Resources

Environmental Organizations

Forest Products Industry

Games Species Management

Indian Affairs Council

Labor Organizations

Nonindustrial Forest Landowners

Research and Higher Education

Resort and Tourism Industry

Secondary Manufacturing

USDA – Forest Service

Consumer Affairs Office

Minnesota Public Utilities Commission

121 7th Place East, Suite 350

St. Paul MN 55101

**RE: PUC Docket Number E-999/CI-23-151**

Commissioners,

The Minnesota Forest Resources Council (MFRC) is a 17-member board created under the Sustainable Forest Resources Act (Minnesota Statute Chapter 89A) to develop policy recommendations to the Governor and federal, state, and local governments and to encourage the adoption of sustainable forest management policies and practices. Council members represent a wide range of forest resource interests. See <https://mn.gov/frc/> for more information.

The MFRC has taken a strong interest in the potential ecological, economic, and social impacts that climate change poses to our forests. The following reports clearly demonstrate these threats and quantify how forests absorb carbon and store it in ecosystem pools and harvested wood products:

[MFRC Climate Change and Minnesota's Forests 2020](#)

[MFRC Carbon in Minnesota's Forests 2022](#)

[MFRC Forest Carbon Dashboard](#)

Our forests also provide the means to reduce atmospheric carbon levels, sustainably meet societal needs for goods and services, support rural economies, and meet the energy demands of the future. Sustainably sourced renewable wood products can be substituted for fossil-fuel intensive feedstocks in energy production. This has multiple benefits: reducing the release of fossil carbon as well as harmful sulfur and mercury; reducing forest wildfire risk; increasing forest health; sustaining rural economies; reducing waste sent to landfills; and reducing reliance upon imported fossil fuels.

In 2022 the MFRC passed the below-linked Resolution entitled, “Supporting Minnesota’s Climate Change Goals Through Development of Sustainable Forest Products Markets.” It details the abundance of renewable woody biomass available in Minnesota’s forests



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and the many benefits of finding uses for these materials. We support new and expanded Minnesota markets for forest and mill residuals and encourage elected and appointed officials to “Include woody feedstocks in statewide fuel or energy standards and/or offer broadly available production incentives for low carbon renewable biofuels derived from woody biomass or other bioenergy feedstocks.”

## [MFRC Resolution 2022-1 Develop Markets For Forest Residuals](#)

PUC Docket Number E-999/CI-23-151 is currently collecting public comments on Implementing Changes to the Renewable Energy Standard and the Newly Created Carbon Free Standard under Minn. Stat. § 216B.1691. There is a real opportunity to meet the carbon free energy by 2040 goal by converting coal-burning power plants to enable the use of renewable woody biomass feedstocks. This is already a practice at District Energy in St. Paul, Minnesota Power’s Hibbard facility in Duluth, and Hibbing Public Utilities.

Producing electricity with little to no net carbon dioxide (CO<sub>2</sub>) emissions is a crucial step in mitigating climate change and reducing the environmental impact of energy production. It involves balancing the amount of carbon emissions released into the atmosphere during the generation of electricity with an equivalent amount of carbon removal or offsetting measures. The goal is to achieve a net-zero carbon footprint for the entire electricity generation process.

A carbon neutral designation for renewable woody biomass is important in order for utilities to make significant investments in converting coal-fired power plants to use woody biomass. Utilities need assurance that the subsequent energy production from those facilities will meet the requirements of Minn. Stat §216B.1691 as amended by the Legislature in 2023. These facilities will be necessary to provide reliable and affordable base-load power for consumers, supplemented by other renewable energy sources that may have limited production at times due to the vagaries of weather.

Forestry is the only economic sector that is net negative in its carbon emission. Making the Forestry sector more net negative will help Minnesota meet its targets for carbon net zero, and with opportunities in Forestry we can broaden climate smart contributions across Minnesota. This will also create greater participation in the green economy, an important goal of the Governor Walz [Climate Action Framework](#) and a requirement of Minnesota Statutes 2022, section 216B.1691, subdivision 9, Local Benefits.



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Minnesota's forests produce an abundance of under-utilized renewable raw materials in the form of mill residues, tree tops/limbs, salvage from fires/insect damage, and tree species with limited markets. The MFRC has established forest residue harvest guidelines to ensure that sufficient woody materials are left onsite to provide wildlife habitat and protect forest soil productivity (<https://mn.gov/frc/issues/biomass/>). Kukrety, et al. (2015) demonstrate that at an average rate Minnesota could potentially produce a sustainable annual residue harvest of 537,900 tons of oven-dried material. This would have a power generation potential of 613.7 million Kilowatt-hours (enough to power 56,871 homes). They estimate reduced emissions of 550,933 t CO<sub>2</sub>e annually and avoided emissions of 594,800 – 2,000,000 t CO<sub>2</sub>e per year, for a net emission reduction potential of 970,000 – 2,785,500 t CO<sub>2</sub>e annually over the use of coal. This would be the equivalent of removing 96,782 cars from the road per year.

**Minnesota's renewable energy objectives as defined within Minnesota Statutes section 216B.1691, subdivision 1(c)(5) list biomass as a qualifying renewable energy source for eligible energy technologies to generate carbon-free electricity. Minnesota Forest Resources Council recommends that the Minnesota Public Utilities Commission provide clarification by including renewable woody biomass as a qualifying renewable energy source for eligible carbon-free energy technologies. This definition should not be constrained by forest type, harvest method, or landownership, so long as the MFRC Site-Level Guidelines are fully considered.**

If you have questions or require further input please contact MFRC Executive Director Eric Schenck at 651-247-1367 or [eric.schenck@state.mn.us](mailto:eric.schenck@state.mn.us).

Thank you for your consideration,

Pete Aube, Chair  
Minnesota Forest Resources Council

#### References:

Sidhanand Kukrety, David C. Wilson, Anthony W. D'Amato, and Dennis R. Becker. 2015. Assessing sustainable forest biomass potential and bioenergy implications for the northern Lake States region, USA. *Biomass and Bioenergy* 81 (2015) 167-176.

10,791 KWh per home annually per EPA:

<https://www.eia.gov/tools/faqs/faq.php?id=97&t=3> Megaton CO<sub>2</sub>e to car number converter: <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>