

PUBLIC COMMENT REPORT

Comprehensive Climate Action Plan



Public Comment Summary

The Metropolitan Council received thoughtful and wide-ranging feedback on the Comprehensive Climate Action Plan from residents, local governments, community organizations, regional partners, and more. Comments were received through an online portal, over email, and through community workshops between September 25 and October 18, 2025. Overall, comments reflected strong support for regional climate action efforts and emphasized the need for clarity, collaboration, and equitable implementation.

Many commenters expressed a desire for more details on implementation, such as responsible actors, timelines, and how progress will be measured. Clearer summaries, visuals, and tools were suggested to help local governments and residents better understand their roles in supporting regional goals outlined in the plan.

Incorporation of more inclusive approaches and the development of meaningful partnerships with underserved communities were also key priorities. Commenters encouraged the Council to work alongside trusted messengers and community-based organizations, particularly those serving immigrant, refugee, and Tribal communities, to ensure climate benefits, workforce opportunities, and decision-making power are shared equitably across the region.

Transportation was a central theme across many comments. Respondents called for expanded investments in public transit, walking and biking infrastructure, and safer and more accessible mobility options. There was strong support for transportation planning that advances equity and includes strategies for suburban and rural areas.

“Transportation is not just about emissions—it is about survival.”

Waste reduction and circular economy approaches were frequently mentioned as important climate opportunities. Commenters supported the inclusion of reuse, repair, composting, and materials recovery systems that reduce emissions while supporting local economies.

“The sensitive and highly-valued ecosystems in the region are already changing in a way that will impact everyone in multiple surprising ways.”

Finally, many highlighted the importance of protecting and maintaining the region’s natural systems. Prairies, wetlands, and tree canopy were recognized as essential for both carbon sequestration and community resilience. Respondents emphasized the need for long-term maintenance and restoration funding, as well as sustainable land management practices that support ecological health over time.

Overall, these comments reflect a clear message that the region is interested in ambitious, collaborative climate action that is detailed, equitable, and grounded in the natural and human systems that make the Twin Cities region thrive.

CCAP PUBLIC COMMENT REPORT

Public Comment	Response
George Wegner Please abandon this plan and return the funding. We already have rules and regulations to support clean air and water. CO2 is a positive compound and we do not need efforts to control it. Thank you.	Your comment has been noted. Thank you for your feedback.
Dave Szurek The Metropolitan Council is the regional planning organization for the seven-county Twin Cities area. The Met Council operates the regional bus and rail system, collects and treats wastewater, coordinates regional water resources, plans and helps fund regional parks, and administers federal funds that provide housing opportunities for low- and moderate-income individuals and families. The 17-member Council board is appointed by and serves at the pleasure of the governt. I don't see how this is within your responsibility. Shouldn't an elected body do this?	Thank you for your comment and question. The EPA awarded Climate Pollution Planning Grants through a noncompetitive formula. The 67 most populous metropolitan areas in the country each received a \$1 million grant for climate planning. As the regional planning organization for the Twin Cities, the Met Council was the lead organization for this region's planning grant. Across the country, regional planning organizations and councils of government were common lead organizations for metropolitan area grants. The Met Council also conducts climate planning within the regional development guide as required by state statute 473.145. The Met Council built on this existing work to complete the Comprehensive Climate Action Plan.
Gerard Albanese Very thorough report. It would help if the plan could be summarized say in a one or two page action plan summary. What happens if you do nothing? What actions would be most impactful short and long term? Financial cost of actions? If you want this plan to be a call to action for most people, you need to show them what actions they can take. For example, if most people drove	Thank you for your feedback. We will share a short summary of the plan once it is finalized and information from this plan will be shared in interactive tools over the coming year. The Met Council's Greenhouse Gas Emissions Reduction Tool (link) shows the impact of taking different actions at a local scale. We also agree that it is powerful to show climate action from a financial

10% less what is the result? If 10% more people took public transportation, what is the result?	perspective and are actively exploring ways to incorporate that information into our climate planning tools.
Ahmed Makaraan (ESHARA (Ethnic Self-Help Alliance for Refugee Assistance))	
Thank you for the opportunity to comment on the Draft Comprehensive Climate Action Plan. I am submitting this on behalf of ESHARA (Ethnic Self-Help Alliance for Refugee Assistance) in Moorhead MN, which works with 24+ ethnic-based organizations across Greater Minnesota and Northwest Minnesota. Transportation as a barrier for New Americans For New Americans, transportation is not just about emissions — it is about survival. Many immigrant and refugee families move to rural and small-town Minnesota for work but find no bus routes, no sidewalks or bike paths, and no affordable alternatives to personal vehicles. Without reliable transportation, workers cannot reach jobs, students miss classes, and parents cannot get to healthcare or childcare. The final plan should explicitly include rural and Greater Minnesota transportation equity, including micro-transit, vanpools, and culturally navigated mobility programs. Workforce opportunities and equity The plan identifies the potential of clean economy jobs but also names barriers such as transportation, childcare, and training. These are exactly the barriers New Americans face every day. Climate jobs and training programs must be paired with transportation assistance, language access, and partnerships with ethnic-based organizations so that immigrant and refugee workers can fully participate in the clean economy. Trusted messengers and community engagement	Thank you for your comment. The Met Council agrees that addressing transportation barriers and green workforce opportunities are important elements in supporting underserved and immigrant communities in our region. In our community engagement, we heard about the importance of trusted messengers and how access to transportation can be a large barrier. In this plan, the Met Council is specifically focused on the Twin Cities metro region. While we do not serve all of Minnesota, we appreciate that the concerns you share are similar to what we have heard when engaging with communities in the metro area. We will continue to engage and work with immigrant-serving organizations as we plan for the region. We also encourage you to share this feedback with state leaders through the Climate Action Framework update to ensure the state-level plan addresses these issues as well.

CCAP PUBLIC COMMENT REPORT

For New Americans, engagement must go beyond translation. Communities respond best when trusted messengers — immigrant leaders, advocates, and organizations — are involved. These leaders speak the language, have lived the same experiences, and have built trust over many years. They already help families integrate into host communities in Greater Minnesota and are best positioned to explain climate action through oral storytelling and cultural connection.

Closing

We encourage the Met Council to make a clear commitment to include rural and immigrant-serving organizations in transportation and workforce strategies. Without this, climate action will leave behind some of the very communities most affected.

Respectfully submitted,
Ahmed Makaraan
Executive Director, ESHARA
info@eshara.org | 701-781-5296

Cheryl Jensen

The money that is being poured into the climate change hoax is ridiculous! This is a complete waste of tax dollars!!!

Your comment has been noted. Thank you for your feedback.

Lois Brink

If you want input, you need to make everything simpler. No one is going to read all of the information that is in this email. Help us help you. All of this information is not impressive, it is overwhelming. Stop writing lengthy reports and making graphs no one understands and give basic information.

Thank you for your feedback. This plan is technical in nature to meet the requirements of the EPA grant that funds the work. We will share a short summary of the plan once it is finalized. Additionally, over the coming months, the Met Council is developing other climate products and tools that break down the information in more accessible ways.

Dave Nei	
I can't find anything in your plan to address the largest greenhouse gas producers. So what is the purpose? Is this just a feel-good exercise? As long as nothing is done to address all the greenhouse gases produced by Jet aircraft, personal/commercial as well as all the international container ships, we are accomplishing NOTHING!	Thank you for your feedback. While aviation emissions are included in the transportation sector, it is a relatively small slice of emissions in the region. There are some state policies related to decarbonization of aviation and shipping (see the Clean Transportation section in the Climate Action Framework). At a local and regional scale, there are many actions that can address significant sources of emissions (sources that are larger at a regional scale than aviation and shipping) as well as actions that can influence overall consumption patterns which in turn affect transportation emissions from shipping.
Catherine Fleming (The Calvary Group)	
There should be year-round food production within the area stations on the Blue Line Extension corridor. Funding from Met Council, Hennepin County, City of MPLS, Opportunity funds, Green Zone funds, New Market Tax credits, Federal transit funds, Federal Housing funds, DEED and Federal workforce funding, Promise Zone, Private Equity (PE), Impact Investments, Local unions pension funds, Foundations and corporate donors	Thank you for your comment. Connecting food production with the accessibility of public transit fits well within <i>Strategy 1: Implement land use policies that support compact and multimodal-oriented development</i> and <i>Strategy 15: Invest in emerging local and urban agriculture</i> . This comment will be shared with Metro Transit staff working on the Blue Line Extension.
Mike Sackman	
I don't see how the metropolitan area will affect anything globally or regionally it's a waste of money and more taxes on already-strained working people.	Your comment has been noted. Thank you for your feedback.
Lanya Ross	
Although this report does address the emissions associated with treatment of wastewater, it is missing the other half of the water equation: the treatment and distribution of water. One could assume that this is included in other categories such as electricity, it is not explicitly discussed in this report and should be. Currently, the only mention of water supply is in Table 17 (Regional	Thank you for this feedback. While emissions from water treatment are embedded in the electricity sector, we have added a mention of water treatment in the description. We will continue to explore the impact of water treatment and conservation on climate mitigation through the Council's broader climate work.

CCAP PUBLIC COMMENT REPORT

training programs for priority occupations that do not require a bachelor's degree). Including this category creates space to identify and explore the impacts of additional mitigation strategies such as water conservation. A 2022 article in the journal Energy Nexus 'Reducing carbon emissions through water conservation: An analysis of 10 major U.S. cities' provides an example (<https://www.sciencedirect.com/science/article/pii/S2772427122000560>). U.S. Environmental Protection Agency provides another: <https://www.epa.gov/statelocalenergy/energy-efficiency-water-and-wastewater-facilities-1>.

Jack Rossbach

I calculated my emissions 28 years ago so good to see that you all are finally going to calculate yours. People don't understand tons of carbon so please use pounds of Carbon dioxide warming equivalents and be aware that methane has become a major part of global warming. Thanks

Thank you for your feedback. While the plan is required to include metric tons of carbon dioxide equivalent to meet grant requirements, the final version of the plan will also include a breakdown of the emissions by greenhouse gas including methane, nitrous oxide, and others.

Angie Malone (City Council Little Canada)

In my travels I came across a phenomenal way to take care of garbage at permanent public gathering areas and street-ways. It is an underground garbage holding tank with the normal receptacle at the top but instead of garbage cans needing to be emptied by trucks or public works, the garbage is connected to a system to take in the garbage. I suppose similar to a sewer system.

I also saw in Amsterdam garbage and recycling receptacles on the surface but a larger holding tank below them that were then emptied by public works or the garbage company but much less frequent trips to empty them and much larger holding capacity so less garbage on the street because the receptacles got too full.

Thanks for sharing this idea for improving waste collection.

Just passing along ideas of waste management. I have pictures too. Thank you, Angie	
Don Schuld	
More and more single-family homes are making to transition to electrification. Problematic are developers, especially of multi-family residences, continuing their usual practice of natural gas installation. To meet the 2050 goals, residential developers will need to be incentivized and otherwise discouraged from infrastructure that includes natural gas. Additionally, with the federal government's attach on renewable energy, local and state authorities will need to prioritize emission reductions over other priorities to have the financial resources to meet the climate goals.	Thank you for your comment. Your feedback on residential development fits well within <i>Strategy 7: Electrify homes</i>, which includes both single- and multi-family buildings. The Met Council will continue to explore new, innovative, and collaborative ways to take action on this strategy and others as federal policy and funding opportunities change.
Charlie Lippert (Mille Lacs Band of Ojibwe, Department of Natural Resources)	
As a Tribal Nation with 18% of our Tribal population residing in Anoka, Hennepin, and Ramsey Counties, and other business interests also in Sherburne County, it is paramount for us to ensure the health and safety of our Band members located within the Twin Cities metropolitan region. The Mille Lacs Band of Ojibwe is please to submit the following comments the Metropolitan Council (MetCouncil) on the Comprehensive Climate Action Plan (CCAP). The MetCouncil's CCAP appears to focus aviation emissions just to MSP, but should also include Reliever Airports: ANE, MIC, FCM, LVN, STP, 21D, and SGS. Although the Reliever Airports can be attributed to each of	Thank you for sharing feedback on this plan. The Met Council is committed to being a partner to Mille Lacs Band of Ojibwe, the 10 other federally recognized Tribes, and the American Indian communities in the Twin Cities region. Thank you for highlighting the missing aviation data. The final draft includes emissions from the smaller airports including regional, reliever, and private airports. We have continued to keep all aviation emissions separate from county transportation emissions. Thank you for noting challenges with Figure 8 and 13. They have been updated in the final draft. The Met Council engages with Tribes and the American Indian communities through venues like the Climate

CCAP PUBLIC COMMENT REPORT

the CCAP-relevant counties, for purposes of the inventory aviation volume should be attributed to each county, but the emissions should be calculated for the region and not by county.

On "Figure 8. 2022 Industrial Processes Emissions by County", the emission class colors were too similar to each other, making the emissions class distinctions difficult to recognize.

On the graphic "Potential policy pathways by sector" (found on page 7 and on page 28 as "Figure 13. Potential policy pathways by Sector") shows a dotted line and an asterisk, which the graphic key does not define. Please indicate what these mean for the CCAP reader.

For engagement with the residents of the Twin Cities, the MetCouncil can also develop a plan to coordinate with the 11 Federally-recognized Tribes of Minnesota to coordinate climate pollution reduction strategies for the Twin Cities' over 35,000 Native American populations, one of the largest in the United States.

Other than these points, MetCouncil's CCAP is strongly written with actionable plans that are realistic to implement. We hope that this is the beginning of cooperation between the MetCouncil and the Tribes for a healthier outcomes for all Twin Cities residents.

Jack Distel (City of Bloomington)

Strategy 17: Restore and protect natural land and water. Priority should be amended to include the long term maintenance activities required to keep natural areas healthy (and retaining optimal climate beneficial characteristics). This includes equipment improvements, like electrifying mowers., and utilizing novel management

Change Government-to-Government Forum and the Met Council's American Indian Advisory Council. It welcomes additional partnership and will continue to seek ways to support the American Indian communities through its climate work.

Thank you for your feedback. We agree that maintaining and enhancing already protected lands and addressing non-protected lands as areas for improvements are both important. The strategy is intended to address the maintenance and ongoing improvements to protected and

practices that maximize carbon sequestration without much energy inputs, like conservation grazing. This section should also be refined to make a differentiation between protected natural areas, like parks and preserves, and improved ecological health of non protected areas, like utility corridors. Most of these improvements can be made by transitioning under used recreational lawns (AKA turf grass lawns) into prairie or meadow lawns, depending on the context of the site. Recreational lawns require much higher mowing regimes which in turn require higher fuel inputs. Meadow lawn requires yearly mowing (or if grazed through conservation grazing, no mowing - though the transportation of the animals is probably equivalent in emissions to the mower). Lastly, the term "natural" is used in an odd way. It infers areas that have not been developed, like parkland. However, many of the tasks focus on land that is integrated into the urban landscape, like utility corridors, which do not quite fit into the concept of natural. To improve this section, it is probably better to just drop the term.	non-protected land like yards, and it has been updated to clarify this. At the Met Council, we use natural systems to refer to land, air, water, vegetation, and wildlife as well as their connections within ecosystems, natural cycles, and human society. We see natural systems as existing across developed and undeveloped land, though they may be more connected and healthier in some areas and more fragmented and polluted in others. We will clarify our language in the final draft.
Todd Shipman (Lakes Sotheby's International Realty)	
Make retrofitting of properties a priority. The benefit is to the environment and to the cost of ownership and stable housing stock.	Thank you for your comment. Your feedback on residential retrofitting fits well within <i>Strategy 7: Improve residential building energy efficiency</i>, and <i>Strategy 8: Electrify Homes</i>. We agree that these strategies are priorities for the region given the benefits to energy use and costs. The Met Council will continue to explore new ways to take action on this strategy within climate and housing policy work.
Sam Crosby	
Strategy #16, regarding investing in tree canopy, says: "with priority areas being those with less tree canopy as	Thank you for your comment. While the CCAP focuses on climate mitigation and therefore trees' ability to capture

CCAP PUBLIC COMMENT REPORT

identified through the Council's Growing Shade tool." My suggestion would be that the top priority be areas where emissions are created, such as around roadways, and then the second priority be what is written above. Let's put the trees at the source point, so they can capture immediately, as it is entering the atmosphere. That would be most effective strategy.

carbon, trees also have climate resilience benefits including providing shade, managing stormwater, and supporting wildlife. The climate resilience benefits of trees are maximized when trees are planted in locations considering existing tree canopy and other community factors. Planting trees with this priority will still provide similar benefits for carbon sequestration since greenhouse gases rapidly become evenly mixed in the atmosphere.

Nathan Miller

Thank you for the opportunity to comment on the Draft Comprehensive Climate Action Plan. I appreciate the Council's leadership in framing a clear regional vision for climate action. From my perspective as a Hopkins homeowner, product and data professional, and active community participant, I want to highlight three areas where this plan could become more actionable and resonant at the local level:

Link Ambition to Implementation and Accountability

The plan sets strong targets but leaves implementation responsibilities diffuse. A clearer "who-does-what" framework would help cities, counties, and regional agencies align efforts. I recommend adding a concise matrix or dashboard showing: (1) responsible parties, (2) near-term (0–2 year) deliverables, and (3) funding or policy levers. This will help communities like Hopkins translate regional intent into local projects and measurable outcomes.

Center Community Design and Housing Affordability Together

Compact, multimodal development is rightly highlighted as the most powerful regional lever. To make this work on the ground, it should be paired explicitly with affordability and

Thank you for your feedback on the plan.

This plan is not intended to lay out specific implementation actions and rather outlines the way different actors have responsibilities across strategies. The plan details where Met Council has implementation authority and associated programs which are guided by other plans including the regional development guide, Imagine 2050, and the Council's Climate Action Work Plan. The Council is also working on translating this content into tools to make climate planning more accessible to communities across the region.

We agree that multimodal and transit-oriented development is important to lowering climate emissions and should be done with equity in mind. The Council's Livable Communities Grants are one program that puts this into practice. The Council's [Anti-Displacement Framework](#), adopted in early 2025 as part of Imagine 2050, will be integrated into investment decisions, including grant programs, over the coming years. In the [2026 Livable Communities Fund Distribution Plan](#), the grant program includes affordability, infill, and transit oriented development as desired outcomes and includes scoring consideration for how well the project provides "direct, convenient connections to existing or planned transit or multi-use trails" and how the project "will maintain

anti-displacement measures. Encouraging infill and mixed-use housing near transit is essential—but only if it keeps existing residents in place and broadens access to lower-carbon lifestyles. Connecting Livable Communities Act funding and local comprehensive-plan reviews directly to those outcomes would strengthen both climate and housing goals. Empower Local Action Through Practical Tools and Transparency Residents and small businesses are ready to participate, but the pathways are complex. The CCAP should include a public-facing resource hub that links regional policies with local incentives, data dashboards, and case studies—so homeowners, contractors, and city staff can see what’s working. Similarly, annual public reporting on progress (emissions, co-benefits, and funding access) would build trust and help sustain momentum across communities. Overall, this plan is a vital step toward aligning climate ambition with local decision-making. Strengthening clarity, affordability, and transparency will ensure that residents, cities, and regional partners can act together to meet the targets we all share. Thank you for considering these comments and for your continued leadership on climate action in the Twin Cities region.	residents’ and/or businesses’ ability to stay in the community and maintain cultural and social community connections.” Additionally, in the 2050 Comprehensive Plans, cities, townships, and counties will now be required to identify their top three housing needs—whether that’s preservation, new construction, senior housing, supportive housing, or others—and commit to using specific tools to address them. This encourages cities, townships, and counties to move beyond broad plans and toward focused, actionable commitments that reflect their local context and capacity, and may include tools that advance affordability and anti-displacement goals. We are working on tools that translate this information into more user-friendly, interactive formats. These tools will initially roll out with local governments in mind and will continue to evolve to incorporate public facing content. The Council will be producing a status report on this plan in 2027 as well as reporting on climate related metrics as a part of the Imagine 2050 Outcomes Measurement program.
Patty Miller	
Excellent work thank you!!	Thank you for your feedback.
Anonymous (Metro Transit - a division of the Met Council)	
In the short to medium term, the solution to reducing GHGs in medium to heavy duty fleets needs to be eclectic, not just electric. There needs to be serious consideration	Thank you for your comment on what it will take to reduce emissions in medium- and heavy-duty fleets. <i>Strategy 4: Accelerate the transition to low- and no-carbon fuels in</i>

CCAP PUBLIC COMMENT REPORT

of the increased use of biodiesel. 20 years ago, MN led the nation with mandating B2 or 2% biodiesel/ 98% petro diesel blend. Let's lead the nation again with even further advancement. Evidence suggests the use of >B20-B50 blends between April 15 and September 30 is achievable without additional technology. Even greater use of biodiesel is achievable today - at over 90% biodiesel - when vehicles are equipped with the Optimus technology system. Forward thinking private businesses and municipalities across the US are successfully using the Optimus system. While renewable diesel (chemically the same as petro diesel) is also a great option, very limited if not no availability in MN is major challenge. Other idle reduction strategies also need serious consideration and are technically possible today. Idle reduction is mostly possible on modern hybrid transit buses, but opportunities exist to apply to standard transit buses. The Met Council and regional partners needs to lead in GHG transportation reduction by developing achievable, timebound goals or targets, and work towards that through eclectic strategies, not just electric.	<i>vehicles and equipment</i> is framed to be inclusive of alternative fuel sources. Within Met Council operations, Metro Transit is exploring biodiesel options for buses. The topic will be addressed in more detail in the Metro Transit Sustainability Plan which will be released in 2026.
Jeff May	
While the plan seems considered, recent federal policy shifts have been aimed at reducing grants and/or tax credits for green energy programs, esp. residential (solar rebates, EV rebates, etc.). More explicit planning by the Met Council regarding how it plans to move forward toward its goals regardless of federal fund availability needs to be presented.	Thank you for your comment. We continue to monitor changes in federal policy and funding and work with partners including state agencies and local governments on how to maintain commitment to and momentum on climate action.
Cindy Tonsager (Dakota County Physical Development Division)	
Transportation- Dakota County Transportation staff have reviewed the	Thank you for your comments and thorough review of the CCAP.

Transportation GHG Emissions Reduction Strategies and have no concerns with the proposed approaches. However, certain implementation authorities and responsibilities outlined in the strategies appear to assume that all local governments possess land use and zoning authority. As Dakota County does not hold such authority, we recommend that any references to implementation roles related to land use and zoning be prefaced with the phrase: “For those local governments that have land use and zoning authority.

Planning -

Page 7 (Summary), also on page 28. Why were natural systems land cover areas and sequestration values held constant in the projections? The implication is that planting more trees and restoring natural land and water (as suggested in the strategies) will not make a significant difference. It would be helpful to see projections that indicate how many restored or planted acres would be needed for a given sequestration impact.

Environmental Resources -

The Met Council’s recently adopted Imagine 2050 has a Water Policy Plan which includes a Metro Water Supply Plan. However, the Climate Action Plan only discusses the Met Council’s role, and GHG impacts and actions related to wastewater. How are GHG contributions from drinking water supply (i.e., drinking water treatment, distribution, etc.) accounted for in the Climate Action Plan? Since Met Council does have Water Efficiency programs, consider if a reduction strategy related to water conservation or reuse would be valuable. Water efficiency actions can help support GHG emissions not only on the water supply side, but can also directly impact wastewater efficiencies.

Updates have been made to reflect that not all local governments have land use and zoning authority.

Land cover and sequestration potential are increasing, though the effect is difficult to see at the scale necessary to show regional emissions. Figure 22 shows the potential sequestration increases in the region with given actions. Ultimately, increasing natural systems land cover is a key mitigation action, but is limited in the highly developed metro region. We now add more detail on the policies and potential in this sector on page 64.

With regards to water supply, energy used for water treatment is captured within the electricity sector. While emissions from electricity decrease largely due to decarbonization of the electrical grid, efforts like water conservation are important for reducing near-term emissions and long-term electricity demand. We have added to the electricity sector description to include this information. We will also continue to explore the impact of water treatment and conservation on climate mitigation through the Council’s broader climate work.

Details on sequestration rates for different land covers is included in the Technical Appendix – see page 159.

Thank you for the note about waste metrics. Households served by organic curbside collection has been removed and replaced with county organics diversion rates.

CCAP PUBLIC COMMENT REPORT

Page 23. Sequestration was estimated based on land cover types. It would be helpful to see the sequestration factors for the identified land covers: forests, woodlands, wetlands, urban trees, and turf.

Pg 52 – Metrics for Tracking Progress: Total households served by organic curbside collection.
MPCA, not Met Council, has authority for metro area solid waste policy for counties. Met Council’s plan references MPCA’s existing regional plan for counties. However, for the “Total households served by organic curbside collection” metric, how would this data be tracked and who would be responsible for it? This is not currently being reported by local governments or tracked by MPCA. It would be challenging to obtain due to concerns with data reliability and accuracy.

Metrics for tracking progress

- County recycling rates
- Tons of waste landfilled
- Total households served by organic curbside collection
- Greenhouse gas emissions reduction

Patricia La Rue (Friends of Lake George)

Your report fails to mention the significant contributions of hydropower. Brookfield Renewable Power provides 18 megawatts of electricity through hydropower. There is the Hennepin Island, Lake Byllesby Dam in Dakota County and the Junction Falls Dam in Pierce County, (Piercer County was included in your research.) There are many locations where dams currently exist that could be retrofitted to produce electricity. Please do not diminish the existences and contribution of this renewable energy,

Thank you for your comment. We have updated *Strategy 6: Encourage energy infrastructure investments aligned with Minnesota’s 2040 Clean Electricity Standard* to include explicit mentions of renewable energy sources including hydropower.

which was green before being green was "cool." Thank you.	
Edward Nemetz	
Consideration of climate change is essential for continued planning and development of the Twin Cities metro area to promote a sustainable and affordable quality of life. The sensitive and highly-valued ecosystems in the region are already changing in a way that will impact everyone in multiple surprising ways. We must encourage the development of alternative energy resources, conservation programs, and the availability of trails and public transportation systems to provide efficient mobility. The policies described in the Climate Action Plan are an excellent start, but the work to implement the plan and measure results must continue regardless of federal support. Minnesota, including the Twin Cities has always provided leadership in recognizing the importance of our natural environment and planning for the future. If necessary, the region may need to join new partnerships with other states and metropolitan areas that similarly value long-term collaboration on climate change solutions.	Thank you for your comment. The Met Council agrees that addressing and encouraging the development of renewable energy, conservation programs, and efficient transportation systems are important aspects of increasing the quality of life for communities in our region. We will continue to explore innovative ways to approach climate action amid federal policy and funding changes.
David Zaffrann (Ramsey County)	
We want to express gratitude to the Met Council team for conducting timely mitigation research, consulting with key parties including local government representatives, community-based organizations and residents to add qualitative data to the draft Comprehensive Climate Action Plan. We understand the need for a broad approach for strategies to allow for flexibility of implementation. It would	Thank you for your feedback. The Met Council is in the process of developing climate planning tools for local governments that will outline how climate strategies may apply best to different types of communities in the region. We appreciate the suggestion to include public health metrics and have added some to more strategies. While the timing will not allow for integrating the University of Minnesota's Climate Adaptation and Resilience Cost Study, we continue to track the project's progress and look

CCAP PUBLIC COMMENT REPORT

be helpful to also specify how strategies apply to urban, suburban and rural contexts.

Where applicable by sector, consider including health metrics to track progress and to weave in environmental justice indicators.

If timelines align and where applicable, consider pointing to the results of the University of Minnesota's Climate Adaptation and Resilience Cost Study to have a clear picture of upfront costs and long-term savings in implementing certain climate adaptive strategies that also result in mitigation.

Uncertainty at the federal level risks not meeting mitigation goals due to funding limitations and chilling local government planning. What are contingency paths forward?

Finally, this document does not incorporate emergency management planning for response to climate-related disasters. Consider acknowledging this need in light of current climate change projections as the Metropolitan Council plays a key role in regional coordination.

SUGGESTION on Inventory Trends and Analysis, Waste, page 21: "Waste emissions include methane from landfills, incineration of municipal solid waste, and treatment of wastewater." This could be misconstrued to mean that methane is a greenhouse gas resulting from the incineration of municipal solid waste; methane is a very minor and inconsistent emission from waste combustion, whereas it is a significant greenhouse gas with high global warming potential from landfilling. We suggest revising the sentence to clarify where greenhouse gas emissions are of the most concern by activity.

to incorporate the results into Met Council climate planning tools.

We continue to monitor changes in federal policy and funding. While federal funding is helpful for issues that are harder to finance locally, there are many actions that can be integrated into how we work at the regional and local level that do not require new funding. The intent of the plan is to be aspirational and ensure that the region is ready when opportunities, federal or otherwise, become available.

While this plan is entirely focused on climate mitigation, there is important work happening on adaptation. The Council will continue its adaptation work including providing technical assistance for local governments to address adaptation and resilience in comprehensive plans.

We have revised the Inventory section on Waste to clarify the greenhouse gas emissions coming from different waste sources.

We acknowledge the significant investment needs to increase walking, biking, rolling, and transit usage in our region. As a funding partner, the Met Council and its Transportation Advisory Board provide significant flexible sources of funding through the Regional Solicitation and the new Active Transportation Solicitation, which will provide approximately \$25 million in new funding annually for these purposes. Recent state legislative sessions reallocated or created several new sources of funding for active transportation, such as the county share of the new regional transportation sales tax, new availability of existing county sales taxes that previously funded transitway operations, and various revenues allocated via the Transportation Advancement Account. Because of the many recent increases and changes in transportation funding, it is unlikely additional significant policy or law

COMMENT on Strategies 1 and 3. Ramsey County supports improved infrastructure for walking, rolling, and biking on our highway and street system. However, implementation of multimodal improvements is limited by challenges including insufficient dedicated and general funding, inconsistent maintenance responsibilities, overlapping agency mandates, restrictive state standards, and conflicts with local governments and/or residents. Significant additional funding beyond the “existing funding sources” noted in the implementation strategy, high-level coordination, and public consensus are needed to meet the goals embodied in the emissions targets.

COMMENT on Strategy 2 – Increase public transit and shared mobility options. The CCAP contrasts the current trajectory of the region’s funding and programs – “business as usual” – against a “path to net zero” which includes significantly increased use of public transit. Ramsey County supports this goal, but the CCAP does not identify any specific strategies that will alter the “business as usual” baseline. Existing funding sources and efforts to expand transit service, including several planned dedicated right-of-way LRT and BRT projects as well as continued Arterial Bus Rapid Transit expansion, will make significant progress but are unlikely to be sufficient to meet the emissions targets in the “path to net zero.” Such ambitious goals would require significant additional funding and a new regional vision and process for delivering truly transformational projects.

COMMENT on Strategy 4 – Accelerate the transition to low- and no-carbon fuels in vehicles and equipment. Several elements in this strategy impact RCPW’s fleet and construction activities. While the CCAP notes that “technology has begun and will continue to increase options for low- and no-carbon fuels... for these types of vehicles,” further advances on an unpredictable timeline

changes will increase related funding over the next few years.

We agree that reaching net zero will require additional investment and service expansion beyond anything currently planned. This is similar to most strategies in the plan where a very ambitious approach would be required to reach net zero. The language in the strategy description has been edited to include more details about what expanded public transit service would include.

Thank you for your feedback on *Strategy 4: Accelerate the transition to low- and no-carbon fuels in vehicles and equipment* and where Ramsey County sees its roles. We recognize that there are many medium- and heavy-duty vehicles that require advances in technology over which the Met Council and local governments have minimal control. We ask that Ramsey County consider providing public EV charging at County facilities and in County right-of-way. An underway EV Public Charging Needs Analysis for the region can inform this as well as possible future work.

The final draft of the CCAP will include a new strategy: *Strategy 5: Reduce the impact of highway expansion on emissions*. While not fully reflective of the suggestion for a capacity reduction strategy, the new Strategy 5 will align the plan with state requirements. Air quality metrics have also been added to this strategy.

We have added the metric *Share of region’s households experiencing energy cost burden*. We will also be tracking weatherization through Building Energy metrics. We will add spatial elements to those metrics (i.e. results in energy-insecure areas) when the regional-scale data allows.

While we agree that resilience hubs are an important climate resilience strategy, we do not see them as a

CCAP PUBLIC COMMENT REPORT

will need to be made make these fuels feasible for all RCPW activities. Additionally, although the CCAP identifies counties as one of the local government entities that should take responsibility for “providing public charging options,” Ramsey County does not see public charging as a county role.

COMMENTS on Transportation Sector: 1) Consider an additional strategy of thoroughfare capacity reduction to mitigate mobile source pollution on major thoroughfares, which are major sources of pollution often impacting vulnerable communities and contributing to cumulative health impacts. This is reflected in Map 1: Distribution of exposure to inhalable diesel particulate matter by percentiles. 2) Metrics for tracking progress: Consider adding pollution reduction metrics in coordination with MPCA.

COMMENTS on Strategy 5, Encourage energy infrastructure investments aligned with the state’s 2040 Clean Electricity Standard. Metrics for tracking progress: Consider adding indicators for energy equity, such as reductions in percent income spent on energy bills in energy-insecure areas, the number of homes weatherized in energy-insecure areas, the number of multifamily apartment buildings weatherized, etc.

COMMENTS on Building Energy Sector
Consider adding resilience hubs as a strategy to achieve building decarbonization through equitable community-centered clean energy, energy efficiency, and battery storage investments. These investments can be coupled to achieve backup power, microgrids with islanding capacity, and/or passive survivability. These investments can be targeted at community-serving facilities, allowing facilities to function as hubs that support the community through extreme weather events and power outages.

primary mitigation strategy. That said, the Council continues to support resilience hubs as a climate action strategy and will include it in climate and resilience planning tools.

We appreciate the potential for thermal energy networks. In this high-level plan, we do not call out specific types of energy projects at the strategy level and reference key examples like district energy networks in strategy descriptions. We will also continue to highlight district energy network projects as an important climate action for the region in other climate planning tools.

We agree wetlands and prairies are important carbon sinks in the region. Our analysis suggests forested systems have the highest sequestration rates in the region (see Appendix C, table 21). Wetlands may have higher overall capacity to store carbon in the long-term (100+ years) but are highly variable and can be emitters when mismanaged. All habitats provide a diversity of ecosystems services that benefit the region, and we now highlight that better in the description for Strategy 18.

We recognize the high costs of tree removal and agree that tree canopy health is a high priority for communities in the region. There are actors at many levels of government that help manage the regional tree canopy. The Met Council will continue to support these efforts through efforts like research on tree canopy health and funding like the Community Tree Planting Grants.

Strategy 18: Protect and restore natural systems has been updated to include mention of the importance of the health of natural systems to their ability to sequester carbon and provide other benefits. The Met Council is working on compiling more information about managing and restoring ecosystems in the region as part of technical assistance for 2050 comprehensive planning. While Met Council

Although district energy networks are mentioned in Building Energy strategies, consider elevating community level Thermal Energy Networks (TENs) as a strategy on its own. There is great potential in GHG reduction, improving indoor air quality and therefore health outcomes which all aligns with goals of the CCAP. The Met Council and cities have a key role in planning for this as these projects stretch beyond individual decision-making. Good planning can link community-scale TEN projects with road redevelopment projects and incentivize TENs in new developments

COMMENTS on Strategy 16 – Tree Canopy.

1) While no one will argue against the notion that trees are good, there is little mention of wetlands and prairie as carbon sinks. Prairies and wetlands reduce carbon more than trees/woodlands.

2) Greater funds should be allocated to tree removal. Tree stressed from a warming climate and diseases will experience greater mortality than they do now. While increasing tree canopy cover within the Metro is a necessary tool for climate mitigation, tree removal is significantly more expensive than tree planting. Costs are increasing: planting/maintaining trees is closer to \$750/tree while removal costs can average closer to \$1200/tree. Ramsey County Parks is already grappling with the immense costs of removing dead ash trees and it is expected that we will lose at least some of our current tree canopy as the climate warms. Without funding set aside for tree removal, local governments will not be able to remove stressed or dead trees and replace them with climate-resilient species. Not being able to remove trees will result in a decreased canopy cover over time.

3) We see a need for programmatic investment in local governments (particularly at the county) for managing trees. We are grateful for the funding that is being

provided funding for these efforts is largely directed towards the regional parks and trails system, we will continue to direct local governments to relevant funding from state partners including the Department of Natural Resources and Board of Water and Soil Resources.

We agree that prescribed burns are an important part of maintaining healthy natural systems. However, we do not include any specific land management practices including prescribed burns in the Comprehensive Climate Action Plan because it is a strategy-level planning document.

The costs are relative to other strategies described in the plan and are not intended to diminish the need or importance of the strategy. Thank you for highlighting other funding sources for this strategy – we have added them to the plan.

We appreciate the suggestions on *Strategy 12: Promote waste prevention, waste reduction, and recycling* and have adjusted the language in the strategy description in the plan.

With regards to agrivoltaics, while we are not calling out it as a specific strategy, we see this as a part of increasing renewable energy in the region within *Strategy 6: Encourage energy infrastructure investments aligned with Minnesota's 2040 Clean Electricity Standard*.

On *Strategy 16: Invest in local and urban agriculture*, we appreciate the feedback and have made edits to reflect these suggestions. We have adjusted the metrics and were only limited in incorporating these ideas based on the availability of data at the regional scale.

allocated for planting initiatives and dead/diseased tree removal, but the real heavy lift is keeping the trees alive and maintaining trees into the future. Costs per tree come down if there is dedicated staff to remove/plant/maintain trees.

COMMENTS on Strategy 17 – Restore and protect natural land and water.

- 1) It is acknowledged that natural systems are the only means of offsetting base load carbon, but there is no distinction between land cover types or performance measures for natural systems to ensure they are performing positively. For example, wetlands and woodlands are our largest natural carbon sinks but both can easily become a source of greenhouse gas emissions (like wetlands receiving stormwater, or burning off/rot pilling excess wood in woodlands). It would be meaningful for us as land managers to have guidance on improved restoration methods and priorities geared towards carbon sequestration. On a similar note, there is a large emphasis on planting boulevard trees, and grant funding available for tree installation. There is little information or grant funding provided for dead and diseased tree removal prior to planting, or insight into sustainable management of wood waste that comes from pruning and replacing these trees.
- 2) Greater emphasis should be placed on wetland and prairie restoration/preservation. Both of these ecosystems sequester far more greenhouse gasses than forests, yet they are barely mentioned in the plan at all. If the Met Council wants to truly maximize the potential for natural systems to sequester carbon, then they should provide funding for the protection and restoration of prairies and wetlands.
- 3) Prescribed burns should be noted in document and mention of the need for funds should be made available for prescribed fire. Both prairies and oak savannas (the

dominant historical land cover types in Ramsey County) depend on periodic fire to survive. Most carbon present in these systems is stored below ground, and while prescribed fires release above-ground carbon from fuels, on balance they increase carbon sequestration by enhancing plant productivity. Prairies are expected to be one of the least affected ecosystems from climate change, and the expansion of prairies in the Metro will increase the resiliency of the local environment as it comes under climactic stress. Oaks are a keystone species in their ability to support hundreds of wildlife species and will be needed for wildlife as they migrate northwards from southern climates. Lack of fire will also allow less fire tolerant species such as maples to become the dominant tree canopy species in our parks system. This is undesirable, as maples are expected to shift their range northwards in a warming climate. Large tracts of Ramsey County terrestrial parkland is either an oak savanna or prairie, and we can only maintain these with prescribed fires.

- 4) “Costs are expected to range from low to medium. Restoration efforts are relatively low cost, but land protection and restoration will increasingly face pressure from development.” Relative to what? Costs are significant and ever-increasing with no consistent funding available.
- 5) Other funding sources used for larger tracts of natural public land restoration include the Outdoor Heritage Fund and the Minnesota Department of Natural Resources’ Conservation Partners Legacy Grant Program.

SUGGESTIONS on Strategy 11: Promote waste prevention, waste reduction, and recycling.

Page 51, Description: The state’s waste management hierarchy in M.S.S. 115A.02 is a long-established policy that results in greenhouse gas reductions and could be cited here as a significant supporting law for the actions in Strategy 11. One approach could be a revision to the first

paragraph's first sentence: "In the waste sector, Minnesota Statutes 115A.02 establishes a hierarchy of practices to achieve the state's waste management goal of protecting land, air, water, natural resources and the public health. Focusing on the most preferred practices in this hierarchy also achieves the greatest reductions in greenhouse gas emissions from waste. Reducing greenhouse gas emissions takes many forms including by prevention waste..."

Page 52, Community Benefits Analysis: Composting is cited here while anaerobic digestion is another organics management pathway currently being developed in the metro area. We suggest changing "composting" to "organics diversion" to mimic the phrase "diverting and management organics", which is used in the Description section on page 51.

Page 52, Metrics for Tracking Progress: we suggest editing the second bullet to read "Tons of waste diverted from landfills," which is the direction of progress being sought in this strategy.

COMMENT on Agriculture Sector. Consider elevating as a strategy dual use of agricultural land, also known as agrivoltaics. A commitment to scaling this strategy can provide many benefits. Local examples already exist.

<https://www.energy.gov/eere/solar/agrivoltaics-solar-and-agriculture-co-location>

<https://system.umn.edu/healthier/agrivoltaic-approach-provides-array-benefits>

<https://betterenergy.org/big-lake-case-study/>

SUGGESTIONS on Strategy 15: Invest in emerging local and urban agriculture, Description, page 59.

"...it is also important to support the smaller-scale."

Suggestion: edit to "...support the distributed, smaller-scale network of..."

"...agriculture that continues to expand in more urban areas." Suggestion: edit to "expand in residential areas". Communal and personal growing spaces exist across Minnesota and by their nature are proximate to where people live. This is true of both farming families and of the broader region that's identified in this plan – urbanized, suburban, suburban edge, rural center, etc).

"Local and urban food systems emerge in many forms from rooftop gardens to year-round indoor greenhouses..." These are among the least commonly occurring, most expensive, and least accessible forms of urban ag. Please cite more accessible and communally accessible examples, such as community gardens and farms; high-tunnels; front yard and boulevard gardens; or balcony and patio potted gardens.

"Additional benefits may include multicultural integration..." Integration is a term implying hierarchy, flattening, and/or erasure by less resourced/powerful groups. Consider replacing with "harmony" or "education" or "understanding".

Under metrics for tracking progress, "Acreage and geographic distribution of community gardens." Suggestion: Acreage, Number, and geographic distribution of Community gardens, farms, orchards, parks permitting foraging. "Greenhouses and rooftop gardens."

Suggestion: Remove these and replace with "Primary land uses (re)zoned (Institutional, Residential, Parks, etc.) to permit and support urban agriculture (Community Gardens

CCAP PUBLIC COMMENT REPORT

& Farms & Orchards; High-&Low-Tunnels; Front Yard & Boulevard Gardens; balcony and patio potted gardens)." Suggestion: Add "Number of hunger relief locations (food shelf, food market) sourcing food from urban agriculture and communal gardening practitioners" Suggestion: Add "Number of K-12 school and major institutions sourcing food from local farmers, urban agriculture, and communal gardening practitioners"	
Tonya Schmitt (Grow to Share)	
Electrify Nonresidential Buildings Authority & Responsibilities: There is nothing at the State level for WI. Is this an oversight because the Council is in MN? Does WI really have nothing? Infrastructure for Walking & Rolling: While infrastructure is the necessary foundation, I saw nothing regarding an educational campaign promoting wellness for people & the planet. We need to bridge the gap between walking for stress relief on a "nice" day and walking/rolling for daily activities of living. GHG Reduction Strategies: Agriculture: Grow to Share is a key asset worth investing in to promote these practices. Synergizing GTS' efforts with local ethical small farms through the Local Food Systems & Sustainable Ag action team feels vital. Inventory Results: It is a bit surprising to me and instills hope that there was an overall decrease (especially in Electricity, seems like our area would not have such reduction?) during the 2005-2022 timeframe. It is alarming	Thank you for your feedback. Throughout the plan, we have added Wisconsin programs and opportunities, including on building electrification. Additionally, the state of Wisconsin is working on non-residential building electrification in their Comprehensive Climate Action Plan and will be including aligned measures for the state. While we don't have a specific strategy about community engagement, we agree that education and local initiatives will play a big role in reaching the region's climate goals. We have added education campaigns to the ways "other actors" support <i>Strategy 3: Increase infrastructure for walking, rolling, and biking</i>.

that Building Fuel increased 117%, Industrial Processes increased 122%, and waste increased 106%. The mitigating effect of Natural Systems is impressive and would have been better without runoff. Electricity needs more attention here. The data are a reminder to focus on the value of natural areas here while focusing on reductions in the big emitter areas.	
Mark Klapatch (Hope for Earth & UW-River Falls)	
On behalf of Hope for Earth's Climate Action & Resiliency Initiative, representing stakeholders in Pierce and St. Croix Counties, Wisconsin, we commend the Metropolitan Council for including our counties in the Draft Comprehensive Climate Action Plan. We support the plan's goals of reducing emissions 50% by 2030 and achieving net zero by 2050. However, we urge the final plan to strengthen local implementation, funding, and equity for rural, cross-state communities. Our key recommendations are: • Partner with community-based initiatives for local implementation. • Expand waste strategies to include circular economy systems. • Include food systems and regenerative agriculture as core strategies. • Ensure equitable access to clean energy and EV infrastructure in rural areas. • Adapt building and development goals for smaller municipalities. • Integrate biodiversity and equitable green space access. • Commit to sustained public education and engagement. • Clarify cross-state coordination and funding access for Wisconsin counties. • Establish county-level metrics and reporting for transparency. By incorporating these refinements, the CCAP will better	Thank you for the suggestions and comments. Throughout the plan, we have worked to add in more relevant funding sources and opportunities for communities on the Wisconsin side of the region. We agree with much of this feedback and will continue to look for ways to engage with local organizations across the metro area. More specifically: We have edited <i>Strategy 12: Promote waste prevention, waste reduction, and recycling</i> to further emphasize the importance of actions preventing waste before it reaches disposal. Within the agriculture sector, we see regenerative agriculture falling into all three strategies and especially <i>Strategy 14: Encourage climate-smart agriculture practices that improve soil health and soil organic content</i>. Many climate-smart agriculture practices also fall under the umbrella of regenerative agriculture. While this plan is focused on climate emissions reductions, we agree that the benefits of these practices are much broader, extending to ecosystem health, public health, food access and more. While the Met Council does not have a specific role in agriculture programs in Pierce and St. Croix Counties, we will encourage engagement with existing producer-led watershed groups in the area. We see the Building Energy strategies focused on energy efficiency and electrification as overarching strategies for

CCAP PUBLIC COMMENT REPORT

reflect the realities, opportunities, and leadership emerging from communities like ours.

Specific Areas of Feedback:

Local Implementation & Governance

We recommend the Met Council establish regional implementation partnerships with community-led initiatives like Hope for Earth's Climate Action & Resiliency Initiative in Pierce and St. Croix counties to strengthen cross-state collaboration, ensure local relevance, and accelerate on-the-ground progress.

Waste Reduction & Circular Economy

Expand waste strategies beyond disposal and recycling to explicitly include community-scale circular economy efforts such as reuse systems, repair events, business partnerships for material recovery, and composting infrastructure. Rural areas like Pierce and St. Croix counties need specific investment in composting access and reuse logistics.

Local Food Systems & Sustainable Agriculture

Include food system sustainability and regenerative agriculture as a core strategy. Expand beyond emissions accounting to include soil health, local food access, and economic resilience. The Met Council should coordinate with Wisconsin counties and regional food councils to support regenerative agriculture pilot programs and rural food transportation planning.

Energy

We support the CCAP's clean energy goals but urge explicit funding and implementation pathways for rural counties. Pierce and St. Croix counties need targeted

new and existing buildings in urban, suburban, and rural communities. We have added more Wisconsin funding opportunities to the Building Energy strategies. Further information on implementing these strategies at a local level will be a part of the Council's Climate Action Toolkit (coming early 2026).

We appreciate the suggestions for natural systems metrics. While we are limited to what we can measure at a regional scale, we did update the metrics to include *Regional acreage under conservation easement* and *Proportion of regionwide open space acreage to population*.

While we don't have a specific strategy about community engagement, we agree is an important part of climate action and the work of education and local initiatives will play a big role in reaching the region's climate goals.

The Met Council will continue to coordinate and engage the region on climate issues, and we also see local governments and organizations as important actors driving change in their communities. The Climate Pollution Reduction Grant Steering Committee is one venue for continued cross-state engagement on implementing the plan.

We have adjusted language within transportation strategies to better reflect all community types including rural communities.

Additional tools for local communities, including resources focused on adaptation efforts, will be rolling out over the coming years. Metrics tracking adaptation efforts will be a part of Met Council's Imagine 2050 Outcomes Measurement program. For Wisconsin-specific resources, we recommend checking out the Wisconsin Local Government Climate Coalition.

support for equitable solar deployment, community energy education, and EV charging network expansion. Include community-based programs that pair energy literacy and cost-saving initiatives with technical assistance.

Buildings & Sustainable Development

Adapt building and development strategies for smaller municipalities and rural contexts. Expand focus from new development to include retrofits and weatherization of existing homes. Encourage model ordinances and funding mechanisms for green building incentives, affordable housing retrofits, and integrated stormwater management.

Green Spaces & Biodiversity

Integrate biodiversity and equitable green space access into the Natural Systems strategy. Include measurable goals for tree canopy expansion, pollinator habitat creation, and nature-based resilience infrastructure (rain gardens, greenways). Align implementation with local volunteer and civic programs to ensure ongoing stewardship.

Community Education

Embed public education, workshops, and behavioral change programs in all strategy areas. Partner with local initiatives already conducting sustainability speaker series, community education courses, etc.

Community Engagement

Institutionalize ongoing local engagement. Create a community advisory network with representatives from all participating counties, including Wisconsin counties.

Policy & Advocacy

Encourage alignment of local ordinances (zoning, energy

codes) through model policies and technical assistance to communities.

Mitigation & Adaptation

Ensure that adaptation and resilience strategies such as flooding, heat, drought, forest health, etc. are developed with equal rigor and locally scalable actions.

Individual & Collective Action

Include support for community-driven collective actions including pledge campaigns, neighborhood initiatives, household challenges, etc. to complement systemic interventions.

Business & Institutional Engagement

Add programs for green business recognition, sustainability workshops, and incentives for small businesses to adopt climate-friendly practices.

Rural Mobility and Transportation

Expand transportation strategies to include rural solutions such as EV charging corridors, shared electric vehicle programs, etc. Rural and cross-state counties like Pierce and St. Croix need mobility options that reflect lower-density realities and cross-border commuting patterns.

Cross-State Coordination

Clarify how the plan will coordinate across state lines with Wisconsin agencies and local governments. Include clear guidance on funding eligibility, data sharing, and implementation support for Wisconsin counties participating in the plan.

Governance and Accountability

Establish a regional implementation committee with representation from all participating counties, including

those in Wisconsin. Provide public reporting on emissions, resilience progress, and outcomes by county to ensure transparency and accountability. Funding and Capacity Building Create dedicated funding and technical assistance for rural communities to implement local climate strategies. Include resources for grant writing, project development, and pilot programs to help smaller communities act on plan priorities. Resilience Metrics Strengthen resilience tracking beyond greenhouse gas reductions by including indicators such as tree canopy, flood preparedness, and access to cooling centers. Broader metrics will help measure community well-being and adaptive capacity.	
Thomas Lucy (Saint Paul Federation of Educators)	
Emissions need to be FAR more aggressive and mandate quicker action across all areas of the County.	Thank you for your feedback.
Melissa Finnegan (Partnership on Waste & Energy)	
Dear Interim Chair Barber and Members of the Metropolitan Council, The Partnership on Waste and Energy (“Partnership”) appreciates the opportunity to share our comments on the Metropolitan Council’s Draft Comprehensive Climate Action Plan. The Partnership is a joint powers board, consisting of Hennepin, Ramsey and Washington counties, that collaborates on waste and energy issues. We seek to end waste, promote renewable energy and enhance the health and resiliency of communities we serve while advancing equity and responding to the	Thank you for your feedback. We have revised the Inventory section on Waste to clarify the greenhouse gas emissions coming from different waste sources. We have incorporated suggested edits throughout <i>Strategy 12: Promote waste prevention, waste reduction, and recycling</i> and appreciate the attention to this issue.

challenges of a changing climate.

We appreciate the plan's consideration of comprehensive solid waste management as one of many methods to address climate change in our communities. We respectfully suggest the following edits:

- Page 21 – “Waste emissions include methane from landfills, incineration of municipal solid waste, and treatment of wastewater.” This sentence could be misread to suggest that methane is a greenhouse gas resulting from incineration of municipal solid waste. In truth, methane is a very minor and inconsistent emission from waste combustion, whereas it is a significant greenhouse gas with high global warming potential from landfilling. We suggest revising the sentence to clarify what greenhouse gases are of most concern from each activity.
- Page 51, Description - The state's waste management hierarchy in Minnesota Statutes, section 115A.02 is long-established policy that results in greenhouse gas reductions. We would recommend citing the policy as a significant supporting law for the actions in Strategy 11. For example:
 - o “In the waste sector, Minnesota Statutes 115A.02 establishes a hierarchy of practices to achieve the state's waste management goal of protecting land, air, water, natural resources and the public health. Focusing on the most preferred practices in this hierarchy also achieves the greatest reductions in greenhouse gas emissions from waste. Reducing greenhouse gas emissions takes many forms including by preventing waste...”
- Page 51 – Further in that paragraph, reference is made to reducing greenhouse gases taking many forms, including fixing landfill methane leaks. It is unclear precisely what this means. We suggest that it should more

clearly describe the need to reduce landfilling and improve methane capture at landfills.

- Page 51 – Finally, the last sentence in that paragraph says, “Promoting biochar... supports overall emissions reduction.” To align with the MPCA’s policy plan, this should also reference using food-derived compost in construction and landscaping projects. We suggest you consider including an additional sentence: “Using food-derived compost in construction and landscaping projects supports organics recycling and sequesters carbon.”

- Page 52, Community Benefits Analysis - Composting is cited here, while anaerobic digestion is another organics management pathway currently being developed in the metro area. We suggest changing “composting” to “organics diversion” to mimic the phrase “diverting and management organics” as used in the Description section on page 51.

- Page 52, Metrics – We suggest editing the second bullet to read “Tons of waste diverted from landfills,” which is the direction of progress being sought in this strategy.

We appreciate the time, talent, and effort that it takes to put together a comprehensive climate action plan. We look forward to working in partnership with you on the efforts outlined in Strategy 11. Please reach out if you have any questions.

Ramsey/Washington Recycling & Energy

Dear Interim Chair Barber and Members of the Metropolitan Council,

Ramsey/Washington Recycling and Energy (R&E) appreciates the opportunity to comment on the

Thank you for your feedback. We have revised the Inventory section on Waste to clarify the greenhouse gas emissions coming from different waste sources. We have incorporated suggested edits throughout *Strategy 12*:

CCAP PUBLIC COMMENT REPORT

Metropolitan Council's Draft Comprehensive Climate Action Plan. R&E is the organization through which Ramsey and Washington counties collaborate to responsibly manage waste. Through R&E, the counties strive to protect health and the environment. R&E offers programs to help residents and businesses reduce waste and recycle better. R&E also owns and operates the R&E Center, which processes trash from the two counties to recover valuable materials and divert waste from landfills. Through all its work, R&E's goal is to move materials up the waste hierarchy, reducing waste and putting materials to their best use.

We were pleased to see the Comprehensive Climate Action Plan's inclusion of Strategy 11: Promote waste prevention, waste reduction, and recycling as a key was to address climate change in the metro area. Regarding Strategy 11, we have the following suggestions:

- Page 21 – “Waste emissions include methane from landfills, incineration of municipal solid waste, and treatment of wastewater.” This structure of this sentence could be construed to say that methane is a byproduct of the incineration of municipal solid waste. Methane is a significant greenhouse gas from landfilling but a minor emission from waste combustion. Please consider revising the sentence to provide more clarity about what greenhouse gases are of most concern from each activity.
- Page 51 - Minnesota Statutes, section 115A.02 establishes Minnesota's Waste Management Hierarchy, which is a key state policy that results in greenhouse gas reductions. We suggest citing the statute as a supporting law for the actions in Strategy 11. For example: “In the waste sector, Minnesota Statutes 115A.02 establishes a hierarchy of practices to achieve the state's waste

Promote waste prevention, waste reduction, and recycling and appreciate the attention to this issue.

management goal of protecting land, air, water, natural resources and the public health. Focusing on the most preferred practices in this hierarchy also achieves the greatest reductions in greenhouse gas emissions from waste. Reducing greenhouse gas emissions takes many forms including by preventing waste...” • Page 51 –To align with the MPCA’s policy plan the sentence that begins with “Promoting biochar...” should also reference using food-derived compost in construction and landscaping projects. Please consider including an additional sentence such as: “Using food-derived compost in construction and landscaping projects supports organics recycling and sequesters carbon.” • Page 52 - Composting is cited in the Community Benefits Analysis. Anaerobic digestion is another organics management method that we are actively developing for use in the metro area. Please changing “composting” to “organics diversion” so that both methods are captured in this plan. • Page 52 - We suggest editing the second bullet to read “Tons of waste diverted from landfills” This results in a metric which mirrors the direction of progress being sought in the overall strategy and reflects a primary goal of R&E. We appreciate the Metropolitan Council’s dedication to addressing climate change and its impacts on our communities and we look forward to working in partnership with you. Please reach out if you have any questions.	
Sandy Tauferner (Hope for Earth, River Falls, WI)	
I applaud the Metropolitan Council including Wisconsin's Pierce and St. Croix Counties in the Draft Comprehensive Climate Action Plan. My comments center on the areas of	Thank you for your feedback. We have edited <i>Strategy 12: Promote waste prevention, waste reduction, and recycling</i> to further emphasize the importance of actions prevent

CCAP PUBLIC COMMENT REPORT

waste strategies and community education.

Expand waste strategies to include circular economy systems.

Expand waste strategies beyond disposal and recycling as there are too many items being sent to the landfills. Work should be done to explicitly include community-scale circular economy efforts such as reuse systems, repair events, business partnerships for material recovery, and composting infrastructure. Rural areas like Pierce and St. Croix counties need specific investment in composting access and reuse logistics.

Commit to sustained public education and engagement. When more is done to educate all community members about the realities of climate change the results of the efforts will be more significant. We need embed public education, workshops, and behavioral change programs in all strategy areas. Partnering with local initiatives already conducting sustainability speaker series, community education courses, etc. will save on funding efforts and engage more individuals in more communities.

Thank you for the opportunity to share my thoughts.

Cheryl Peterson

I would like to see investment in geothermal infrastructure for neighbors to tap into. Geothermal has a very low carbon footprint and I believe it is the future of heating and cooling buildings. After the initial installation costs, the annual amount of energy needed to run these systems is drastically lower, thus saving Saint Paulites money.

Please invest in this ecofriendly technology.

Sincerely,
Cheryl P

waste before it reaches disposal. We have also added Wisconsin-specific resources that would be more applicable to communities in Pierce and St. Croix counties.

We agree that community engagement and education is an important part of climate action. We know organizations across the region, like Hope for Earth, are doing great work in their communities, and we will continue to explore ways that the Met Council can support these efforts.

Thank you for your feedback. We have included a call out to geothermal energy in *Strategy 6: Encourage energy infrastructure investments aligned with Minnesota's 2040 Clean Electricity Standard*. We also mention district energy systems in *Strategy 8: Electrify Homes* and *Strategy 10: Electrify non-residential buildings*. These systems can be geothermal-powered, like the new project at The Heights in Saint Paul, and provide many of the benefits you outline.

Tovah Flygare (St. Croix Watershed Stewards)	
I applaud the Met Council efforts to increase climate resilience and decrease GHG emissions. I strongly urge the Met Council to partner with existing programs to implement and strengthen climate resilience and mitigation initiatives. In rural areas, trusted partners are a vital part of efficient implementation. Recommendations for local partners in St. Croix County and surrounding areas as follows (happy to connect you): for local food systems and agriculture as climate mitigation and resilience: St. Croix Valley Food Alliance, Wisconsin Farmers' Union, Grow to Share Community Gardens (partners with local food programs), partnerships with MN entities along the MN side of the St. Croix, such as Big River Farms. For healthy water and biodiversity as climate mitigation and resilience: St. Croix Watershed Stewards/Washington County Watershed Stewards, Wisconsin Water Action Volunteers program, Carpenter Nature Center (locations in St. Croix County, WI and Dakota County, MN), Trout Unlimited (local chapter Kiap-TU-Wish), possible partnerships with Universities Wisconsin and other education systems in Western WI. Local Food Systems & Sustainable Agriculture are especially important for addressing climate change in Western WI and other rural areas of the Met Council parameters. I ask that you Include food system sustainability and regenerative agriculture as a core strategy. Expand beyond emissions accounting to include soil health, local food access, and economic resilience. The Met Council should coordinate with Wisconsin counties and regional food councils to support regenerative agriculture pilot programs and rural food transportation planning. We also have Gleaning programs and other initiatives to reduce food waste and increase	Thank you for your feedback. We agree that partnering with local governments and organizations working on the ground across the region is the best way to move climate action forward. We appreciate the ideas for organizations on the eastern side of the region. Within the agriculture sector, we see regenerative agriculture falling into all three strategies and especially <i>Strategy 14: Encourage climate-smart agriculture practices that improve soil health and soil organic content</i>. Many climate-smart agriculture practices also fall under the umbrella of regenerative agriculture. While this plan is focused on climate emissions reductions, we agree that the benefits of these practices are much broader, extending to ecosystem health, public health, food access and more. While the Met Council does not have a specific role in agriculture programs in Pierce and St. Croix Counties, we will explore opportunities for coordination and partnerships, and we have added Wisconsin-specific opportunities to the plan as well. The Met Council also does not directly work on manure management from livestock production. Much of that work is done through state agencies including the regulatory authority of the Wisconsin Department of Natural Resources. The Met Council will have regenerative agriculture and manure management strategies in a Climate Action Toolkit (coming early 2026) with more resources.

transportation efficiency that I commend as relevant partners in reducing the GHG emissions and other damages from waste in the food system.

Finally, on the topic of waste reduction and management, Western WI has a great interest in viable composting programs for cities and larger townships. Especially in the Hudson-River Falls area, where there is the university as well as several schools and businesses that could be relevant partners in a composting initiative.

Will the Met Council, in addressing manure issues, address the issue of Concentrated Animal Feed Operations (CAFOs) in this or any other plan?

It would be helpful for a persuasive guidance to be available to all counties, cities, and townships that are considering local ordinances to protect against large-scale manure spills and chemical contamination of sensitive karst topography and biodiverse habitats in water as well as on land.

Additionally, if the Met Council is addressing nitrogen, will there be a portion of the guidance using the latest research on the benefits of regenerative farming practices, crop rotation, or other sustainable implementations?

Section referenced: "Strategy 14: Manage fertilizer and manure to reduce emissions

Description

Fertilizer and manure are two agriculture materials that can be managed to reduce greenhouse gas emissions from the agriculture sector. Slow-release or controlled-release fertilizers and stabilizers can increase the nitrogen efficiency of fertilizers, lowering nitrous oxide emissions while ensuring crops still receive the benefits. Manure management techniques like solid-liquid separation, diet

adjustments, and anaerobic digestion can reduce the greenhouse gas emissions from livestock. These practices are particularly relevant for rural and agricultural parts of the region, especially Carver, Dakota, Pierce, and St. Croix counties. ..."	
Robin Boles (Hope for Earth)	
Thank you for including Pierce and St. Croix Counties in Wisconsin in the Draft Comprehensive Climate Action Plan. We support the 2030 and 2050 emissions goals but urge the final plan to strengthen local implementation, funding, and equity for rural, cross-state communities. Our key recommendations are: • Clarify cross-state coordination and funding for Wisconsin counties • Partner with community-based initiatives. • Expand waste strategies to include circular economy systems. • Include food systems and regenerative agriculture as a priority focus. • Support equitable clean energy and EV infrastructure in rural areas. • Adapt building and development goals for smaller municipalities. • Integrate biodiversity and equitable green space access. • Commit to sustained public education and engagement. • Establish county-level metrics and reporting for transparency. We feel these adjustments will help the CCAP better help rural communities like ours.	Thank you for the suggestions and comments. Throughout the plan, we have made edits to reflect these recommendations and added more relevant funding sources and opportunities for communities on the Wisconsin side of the region.
Joan Pasiuk	
Focus on dense land use as most important Identify and convey URGENCY in all aspects of the plan Implement free transit during air quality alerts Declare Met Council climate emergency	Thank you for your feedback. The Met Council will be tracking its progress on climate work, including for greenhouse gas emissions targets and more detailed measures. This tracking will happen through the Imagine

CCAP PUBLIC COMMENT REPORT

Include climate emergency messaging in all external communication Hold annual public hearing on progress on MC climate goals Adapt Job descriptions of all county employees to include climate emission attention and climate goals	2050 outcomes measurement program. Met Council is working to integrate climate and sustainability work into more positions across the organization. This effort is guided by our internally- focused Climate Action Work Plan.
City of Minneapolis staff comments	
Metropolitan Council's Draft Comprehensive Climate Action Plan City of Minneapolis Staff Comments October 16, 2025 City of Minneapolis Climate and Sustainability + Environmental Programs The actions in this draft plan are not surprising and are quite straight forward and reflect the most common strategies in climate action plans among similar climate zones. Overall, we read this plan as guidance for cities and communities that do not have their own climate action plans, allowing them to have goals and strategies to refer to. That said, how this plan is to be used by various cities and towns within the Metropolitan Council region seems unclear. Further detailing, at the beginning of the plan, of how this document is to be used – which may vary on community size or density – would be clarifying and valuable. If the plan is to be used in any more specific ways for compliance or collaboration with the Met Council, we would welcome that clarification. Specific plan comments: ☐ This plan does little to speak to the "how" this work gets done, and it provides a reasonable comparison of impact across sectors. This will provide cities that do not have	Thank you for your feedback. We have added more about the purpose of the plan to clarify its role among Met Council plans and how it can be used. Overall, the role of this plan is to serve as an aspirational climate mitigation plan for the region, compiling emissions data, projections, and reduction strategies. It can be a guiding plan for cities interested in climate work that do not have specific climate action plans. All of the data and policy work that is pulled together in this plan will also be reformatted into tools for local governments to support local climate planning in comprehensive plans. We are working on determining if there is a way to provide the funding resources in an organized and updated format as part of the Met Council's climate tools. We have edited the description for <i>Strategy 16: Invest in local and urban agriculture</i> to better highlight biochar as a way of implementing this strategy and appreciate the leadership of Minneapolis in this area. We have added county organics diversion rates as a metric for <i>Strategy 12: Promote waste prevention, waste reduction, and recycling</i>. We appreciate the suggestion on metrics for local and urban agriculture. We have adjusted the metrics for this strategy to ensure that the metrics could be reasonably measured and in doing so, removed the metric around specific practices or infrastructure.

climate action plans a broad view of where emissions are greatest, which is a helpful tool for prioritizing efforts.

☐ Our team has engaged with Met Council's data team on their methods for calculating transportation emissions, specifically. We determined that their method is less helpful for a more urban/dense environment. We would not be able to use their methodology in whole at this time (not aligned enough with our vehicle traffic patterns). However, with some modifications, a variation of the Met Council's methodology could be helpful to us and may be of interest to other large cities in the metro.

☐ Notes throughout the plan, there were some helpful references:

o The "Role" of regional and state entities and the state, helps to highlight collaboration opportunities.

o The list of other actors and resources is helpful. With federal policy changes, it would be ideal if this was a dynamic list that was updated annually or with some frequency.

☐ We support the inclusion of Strategy 15:

o "Invest in emerging local and urban agriculture" and the Met Council's statement that, "the natural systems sector primarily sequesters greenhouse gases reducing regional emissions 2.5% in 2022...protecting or restoring natural systems where possible and improving tree canopy throughout the region can significantly improve the quality of life while sequestering greenhouse gases." (page 60)

☐ While the Draft Comprehensive Climate Action Plan focuses on the benefits of expanding the tree canopy in the region, there are other local and regional strategies to sequester greenhouse gases that are important for durable sequestration, especially in urban environments.

We are happy to hear there is strong alignment between the transportation strategies and Minneapolis' Transportation Action Plan.

We have adjusted our data formats and language to clarify information shown in emissions projections.

While there are not new competitive grants that immediately follow from this plan, there are existing funding sources including grants from the Met Council as well as state agencies that fund portions of this work. We have done our best to identify those opportunities within each strategy, and this plan can help guide future funding programs as well.

Electricity inventory emissions are based on utility provided data, so EV emissions would be incorporated in the electricity section. Projections are more complicated as the current EV stock may be reflected in how we calculate future demand, but changes in the market share of EVs will be accounted for in the transportation sector. The current electricity sector projections do not account for the projected shift to EVs, but these emissions are accounted for in the transportation sector. On-going work will try to partition and explain these more cleanly.

Our business-as-usual scenario is based on an EPA MOVES model, which incorporates trends and current policy to project future car stock and fuel efficiency. Our approach reflects that any acceleration of EV uptake beyond what is embedded in MOVES is driven by policy initiatives and other actions that would be reflected in the potential policy pathways and not business as usual.

As noted, transportation emissions are largely flat from 2005 to 2022 as increasing VMT in the region is offset by increased fuel efficiency of the vehicle stock. Future projections are based on the Met Council Regional Travel Demand Model, projecting increased VMT, and the EPA

CCAP PUBLIC COMMENT REPORT

o For example, the city of Minneapolis is building a biochar facility at 670 25th Avenue Southeast which will remove over 3,700 tons of carbon dioxide by producing over 500 tons of biochar per year. The Met Council should include development of biochar in Strategy 15 which covers carbon sequestration. Making note of such methods could be helpful for other cities in the region.

City of Minneapolis Health Department, Homegrown Minneapolis

The inclusion of language recognizing the importance of the food system in climate work is positive and helpful. While all communities are unique, a strong local food system benefits us all.

Specific plan comments:

p. 52 – Strategy 11

☐ Community benefits analysis: We support this strategy. We appreciate the inclusion of attention to barriers faced by renters and small businesses in implementing organics recycling. These are areas with significant opportunity to increase support.

☐ Metrics for tracking progress: We support the tracking of these metrics and see them as reasonable and useful to track. We suggest the consideration of an additional metric around the amount of organics collected, such as tons of organics recycling collected curbside. This would help track diversion from the landfill over time.

p. 56 – Strategy 13

☐ Community benefits analysis: We support this strategy. We appreciate the acknowledgement of the need for financial support for implementation. Such financial support is most beneficial when it is flexible. For example, supporting smaller producers and community gardeners in

MOVES model, projecting increased fuel efficiency and EV uptake, which nets to the observed decrease in total emissions.

We have edited different components of *Strategy 1: Implement land use policies that support compact and multimodal-oriented development* to reflect these suggestions. We will also continue to explore ways to measure progress. Thank you for the constructive feedback on this strategy.

We have edited different components of *Strategy 2: Increase public transit and shared mobility options* to reflect these suggestions. We have added metrics to track job accessibility and housing near rapid transit. We have also added a transit crime metric and recognize this is only a partial representation of overall satisfaction but one that we can commit to tracking based on existing data collection. Thank you for the constructive feedback on this strategy.

We have edited different components of *Strategy 3: Increase infrastructure for walking, rolling, and biking* to reflect these suggestions. With regards to active transportation metrics, we are limited by the availability of region-wide data for tracking local trails and usage. We have added the metric *Proportion of all trips that are walked or bicycled* to capture active transportation beyond the regional trail system.

Met Council multimodal planning staff are exploring options for a future update to the Regional Bicycle System Inventory. This task is not currently budgeted nor identified in our planning work programs, and we welcome continued engagement with city staff on this topic.

Thank you for engaging in the Workforce Work Group. The final *Appendix B: Workforce Planning Analysis* has

implementation can be beneficial for testing new methods on different scales.

p. 59-60 – Strategy 15

□ Metrics for tracking progress: We suggest considering adding language about the role of season extension more broadly in urban agriculture (including hoop houses) in the community benefits analysis. The metrics about greenhouses and rooftop gardens shows part of the picture but may be difficult to track. We suggest broadening this metric to include hoop houses for broader applicability, as greenhouses are less feasible for many small-scale urban growers.

City of Minneapolis Transportation Planning and Programming

The city looks forward to working with the Metropolitan Council on advancing regional goals, and offers these comments in support of that future with an emphasis on the following:

The City of Minneapolis is dedicated to reducing harmful emissions and reliance on fossil fuels through a variety of strategies. We see our mission and policy directives as strongly aligned with the goals and desired outcomes of the *Comprehensive Climate Action Plan*. We look forward to learning more about opportunities to shape the implementation of this plan, especially opportunities for competitive funding and partnership for ongoing planning and project work.

Existing City of Minneapolis policies that support this work include:

The Minneapolis Transportation Action Plan and Minneapolis 2040 Comprehensive Plan:

additional information on job quality and wages as well as workforce readiness and representation.

The Minneapolis Transportation Action Plan (TAP) is a 10-year action plan to guide future planning, design, and implementation of transportation projects for all people however they choose to move around. The TAP is closely aligned with the goals of the *Minneapolis 2040 Comprehensive Plan* and proposes changes to transportation systems that compliment and support the land use goals of the 2040 plan.

One of the primary goals of the TAP is focused on climate, with an explicit goal to *“Reshape the transportation system to address climate change using technology, design, and mobility options to aggressively reduce greenhouse gas emissions caused by vehicles.”*

To achieve the goals of its 10-year timeframe, the TAP establishes the following mode shift benchmarks to reach by 2030:

- ☐ Having 3 out of every 5 trips taken by means other than a car – including walking, biking and transit
- ☐ A 1.8% reduction in Vehicle Miles Traveled per year, in line with goals set in *the Minneapolis Climate Action Plan*

We look forward to partnering with the Metropolitan Council in achieving these goals and delivering on the emissions reduction targets set out in the Comprehensive Climate Action Plan.

Specific plan comments:

p. 7 – “Net zero, indicated by the black asterisk in 2050, shows the necessary policies and actions to achieve very low emissions, offset by sequestration, by 2050.”

- ☐ confused by this wording - should be something like "shows the outcome of the policies and actions necessary to..."

p. 7 –

☐ Add labels to diagram for “business as usual” line and net zero asterisk

p.10 – CPRG Overview

☐ Some additional information on how this plan gets implemented might be helpful here. Are competitive grants going to be made available to local governments? On what timeline and for what types of projects?

p. 17 – Electricity

☐ Based on the accounting methods outlined, one would assume emissions from EV vehicle electricity-use fall under Electricity, not Transportation? But it may be helpful to note.

p. 25 – “Transportation activity data was modeled based on the Metropolitan Council regional travel demand model. Emission factors were based on EPA’s MOVES dataset, which anticipates increased fuel efficiency and electric vehicle market share. Aviation projections were anchored to the MPCA’s state modeling.”

☐ The amount of emissions reduction projected in the BAS scenario for transportation seems low given the projections for conversion to electric vehicles by 2050. It seems likely to assume that there will be an acceleration of this shift in coming years that does not directly correlate to past trend lines.

☐ Does the projection for the Electricity category also consider this projected shift in electric vehicle share?

p. 26 – Business as Usual Project on Results table – Transportation

☐ Noting that emissions stayed roughly the same between 2005 and 2022 despite average light duty vehicle MPG improving from 20 to 26, we would be interested to see more explanation of the projected decrease due to increased fuel efficiency as part of final version appendix.

p. 31 – “Equitable land use planning should incorporate affordable housing, anti-displacement measures, and meaningful community engagement to ensure that changes benefit existing residents.”

☐ this should address its basis in the racial inequity of past planning processes and decisions

p. 31 – “State government: State agencies do not have direct authority over local land use.”

☐ While sometimes controversial, state governments have played a role in land use regulation through both environmental regulation and zoning preemption. While this plan doesn't need to advocate for that role, the possibility of a state role could be acknowledged.

p. 32 – “Metrics for tracking progress”

☐ These metrics don't necessarily account for the goal of developing mixed-use neighborhoods. A metric that accounts for both density and access to goods and services within close proximity would better account for the goal of achieving walkable and/or multimodal communities.

p. 32 – “Cost is expected to be medium to high depending on implementation approach. Costs are often embedded in community development projects and costs of multimodal-oriented development are not necessarily higher than costs of development generally.”

☐ They are not only not necessarily higher on a cost / unit ratio to develop, but they also often generate a much higher return in the form of tax base and land value / acre for local governments. The plan should state the potential benefits as well as the costs here.

p. 32 – “Shared mobility refers to transportation modes where users use the service at the same time or independently of one another and includes micro transit, carpooling, and ride sharing. It can be a more flexible alternative to fixed-route public transit.”

☐ Consider removing ride share here because in the most commonly used sense (i.e. Uber/Lyft), it's been shown to increase VMT

p. 33 – “Local government: Cities and counties work with transit providers on service levels and have control over local land use and zoning which play an important role in transit feasibility across the region.”

☐ not just service levels - also infrastructure (bus lanes, traffic signal priority, in-lane stops, etc.)

p.33 – Metrics for tracking progress

☐ Transit ridership is increasingly tied to perceptions of transit and satisfaction with level of transit service in time, safety, and comfort. While not directly related to climate, measuring transit customer satisfaction and perception could help gauge why transit ridership is or is not succeeding in its goals of growing ridership.

☐ Add something tracking accessibility - this would be better measured distinctly from neighborhood accessibility metric mentioned in strategy 1. Focused on time and job/education accessibility rather than distance and neighborhood amenities

p. 34 – “Much of the Twin Cities region has a well-developed bike network composed of almost 4,000 miles of existing bikeways and almost 3,000 miles of additional planned bikeways.”

☐ Would not agree with this phrasing - bike network is not adequate in the vast majority of the metro area for the goal of this strategy which is to replace car trips (many of the miles of bikeways cited are recreational in nature).

p. 34- “In many underinvested communities, sidewalks, crossings, and bike lanes are inadequate or absent, creating safety and mobility barriers.

☐ prefer "bikeways" or "bike infrastructure" - bike lanes (i.e. paint only) are inherently inadequate

p. 35 – Metrics for tracking progress

☐ Think about tracking local trails and bikeways as a measure of success in addition to regional systems.

☐ would like to see something that specifically tracks protected bikeways or other bike infrastructure that is suitable for all ages and abilities

City of Minneapolis Workforce Development

☐ We support the feedback provided by the Workforce Work Group recommending broad framing of what jobs are included as green jobs and related occupations. There is not a clear definition of a green job, and we support this approach.

☐ We appreciate that future efforts will dig deeper into aspects of job quality beyond wages, and we look forward to being a part of those conversations. Job quality will drive job seeker interest to these occupations so it's valuable to get a complete picture.

☐ We support Met Council's plan to outline career pathway information related to these occupations.	
City of Bloomington staff comments	
• I think there needs to be more of a callout for county governments from cities in the transportation implementation authority. Counties manage roads, just like cities and are a key to ensuring infrastructure for other modes of transportation. Often times there are gaps in a local network because it is county road and the County doesn't support the vision and direction of the City. • I think that there should be more attention to metrics that track usage on regional trails and bikeways. There are devices to track usage, so we should push to go beyond just measuring the miles of trails we have in the region and actually understand how many people are using the trails. Often, the NIMBY argument is that "no one bikes in my community" and we don't have the data to prove them wrong. I hope the Met Council could get to a place where they are doing regular counts of bicycles and pedestrians like we do for cars. • To show what we mean by multi-modal oriented development and to send a uniform message with the State. I'd say this instead in the summary. "Strategy 1-4: Implement land use policies that support compact and multimodal-oriented active & transit-oriented development, increase public transit, and accelerate the transition to low- and no-carbon fuels in vehicles."	Thank you for the feedback. We've made edits across different strategies to add clarity and reflect these suggestions. With regards to active transportation metrics, we are limited by the availability of regional scale data for tracking usage. We have added the metric <i>Proportion of all trips that are walked or bicycled</i> to capture active transportation beyond the regional trail system.

CCAP PUBLIC COMMENT REPORT

- On page 32, In the “complementary funding sources” I’d add the acronym since that’s why people know it by in MN.
 - o Minnesota Department of Health Statewide Health Improvement Partnership (SHIP)
 - o In the “community benefit analysis” section on page 32. It would be nice to give a few examples of transportation gaps.
- I think it's a challenge to always link back to SHIP for a complementary funding source as that funding is flat. I wish we had more funding opportunities to connect to this work. I might make a stronger case for comp planning in the document around the zoning work. There are also vector issues that seem to be missed, aside from focusing on emerald ash borer, there is not a recognition of vector borne disease increases from climate, which has impacts on zoning and land use and how we navigate indoor spaces.
- I would also add a positive comment around indoor electrification for HVAC in that it could increase ability to not only navigate extreme heat but also mitigation pollution and infectious disease risks too. So a focus on indoor air quality associated with that along with an electrification goal would be ideal.
- I have a comment on page 42 under “Implementation Authority and Responsibilities” Local government: Local governments connect residents with energy efficiency programs and hire/designate staff who serve as experts and prioritize outreach. Local

governments can also offer financial assistance through direct funding, utility and nonprofit partnerships, or rebate programs. Just a note that people need to hire staff for these roles or nothing is going to happen.	
Hennepin County	
Hennepin County Recommendations on the Metropolitan Council's Comprehensive Climate Action Plan (CCAP) Introduction The Metropolitan Council's Comprehensive Climate Action Plan (CCAP) establishes a critical framework for advancing regional decarbonization. Hennepin County appreciates Met Council's leadership in developing a data-driven and stakeholder-informed plan that aligns with local and state objectives. However, to fully achieve 2050 greenhouse gas (GHG) reduction targets, the CCAP should evolve from a sector-based mitigation framework to an integrated systems approach, one that intentionally links land use, the built environment, energy systems, transportation, and equity through coordinated regional action. Upon the adoption of our Climate Action Plan, Hennepin County is implementing strategies to reduce emissions, enhancing community resilience, and ensuring equitable outcomes. Drawing from this experience, the County offers the following recommendations to strengthen the CCAP and align it with regional plans, leverage resources, expand capacity, and meet community needs. Natural Systems and Land Use The CCAP appropriately recognizes natural systems as essential to the region's resilience but largely positions their restoration and protection as long-term actions. This	Thank you for your feedback. We agree that natural systems are integral to climate action in the region, both for adaptation and mitigation. The ordering of sectors with natural systems at the end was not intended to diminish the importance of the work. While the most ambitious results of these strategies will take time, we do not see these strategies as less essential nor do we see the timeline category of medium- to long-term as indicating that starting action should wait. We have edited the strategies to further highlight resilience co-benefits and included specific mention of development pressure. The Council is coordinating its natural systems tools and frameworks with Hennepin County conservation staff and looks forward to continued partnership. The Met Council's existing Growing Shade tool allows users to identify high need areas based on climate and environmental justice factors including heat exposure. As we work on updates to the tool, we will consider including explicit air quality indicators. We see building benchmarking and performance standards work as best led by partners including state agencies that have more expertise in these areas. The Council continues to seek opportunities for funding for residential energy retrofits. Additionally, in the 2026 Livable Communities Fund Distribution Plan, the grant program includes scoring consideration for how well development projects provide <i>energy-saving activities, beyond in-unit fixtures and furnishings, that result in</i>

CCAP PUBLIC COMMENT REPORT

approach underestimates the immediate and measurable role that natural systems play in carbon sequestration, flood mitigation, urban cooling, and public health. To achieve regional net-zero goals, natural systems must be elevated as foundational climate infrastructure, not supplementary measures.

Hennepin County recommends that the Metropolitan Council CCAP:

- Prioritize the restoration and protection of natural lands and water systems as immediate regional actions, recognizing their co-benefits for mitigation, adaptation, and equity.
- Acknowledge development pressure as the primary threat to remaining natural systems and establish regional policy, funding, and zoning mechanisms to safeguard these resources.
- Adopt a regional natural-systems carbon accounting framework, modeled after Hennepin County's approach, to quantify sequestration potential, and prioritize conservation investments.
- Incorporate tree-canopy equity mapping to address disparities in heat exposure and air quality, ensuring that nature-based solutions benefit the communities most affected by environmental and health inequities.

Built Environment and Energy Systems

The built environment represents both a major source of greenhouse gas emissions and one of the region's greatest opportunities for cost-effective reduction. While the CCAP identifies strategies for energy and buildings, it can be strengthened by more explicitly connecting building

decarbonization, water efficiency, or reduced energy costs for cost-burdened residents.

We appreciate the interest in ambitious action and coordination between land use and transportation. Pricing mechanisms fall under state roles in the transportation system. We see transit-oriented development falling under *Strategy 1: Implement land use policies that support compact and multimodal-oriented development*. While this plan is not the venue for a detailed approach to transit-oriented development, the Met Council provides many tools and resources to support these efforts (see [Transit Oriented Development Guide - Metropolitan Council](#) and [Transit Oriented Development - Metro Transit](#)). Zoning reform including parking reform could support many transportation strategies. While it is not called out as a strategy in the CCAP, it emerges through local government roles and more specific zoning-related actions will be included in Council climate planning tools for local governments.

performance, electrification, renewable integration, and equity to the region's decarbonization pathway.

Hennepin County recommends that the plan:

- Accelerate building efficiency and electrification by establishing region-wide frameworks for deep energy retrofits, benchmarking, and performance standards across residential and commercial sectors. Hennepin County brought together cities and building owners to do energy benchmarking which informed and shaped the State of Minnesota's Large Building Energy Benchmarking program.
- These efforts should align with state building code updates and utility incentive programs, integrate renewable energy systems, and promote on-site generation, solar-ready construction, and microgrids that improve energy reliability and resilience, particularly for critical facilities and resilience hubs.
- Address energy burden through equitable implementation, expanding low-income retrofit, weatherization, and community solar programs to reduce household costs and improve indoor air quality.
- Leverage coordinated financing and investment tools, including the Met Council's Livable Communities Act grants, the Minnesota Climate Innovation Finance Authority, and other incentives to advance clean energy adoption.

Transportation and Mobility

The CCAP appropriately emphasizes mode shift and vehicle electrification but could further strengthen its strategies by incorporating behavioral, fiscal, and land-use

tools that complement infrastructure investment and accelerate change.

Hennepin County recommends that the plan:

- Evaluate regional pricing mechanisms—such as gas taxes, congestion pricing, or mileage-based user fees—to manage travel demand and create a sustainable revenue stream for transit and multimodal infrastructure.
- Encourage teleworking, flexible commuting, and adaptive reuse of office and commercial spaces, which can reduce vehicle trips while supporting mixed-use redevelopment and economic vitality.
- Integrate land use and transit planning by aligning growth with transit corridors and expanding support for compact, walkable, and mixed-use development. The County's Transit-Oriented Communities (TOC) framework offers a model for aligning local land use with regional transit investment.
- Account for emerging travel and freight patterns, including e-commerce and last-mile delivery, through coordinated planning that balances logistics needs with emissions reduction goals.
- Advance parking and zoning reforms to reduce minimum parking requirements and incentivize shared, green, and EV-ready facilities. These efforts should be paired with investments in active transportation infrastructure, safety, and accessibility improvements.

Conclusion

Hennepin County supports the Metropolitan Council's leadership in developing the Comprehensive Climate Action Plan and views this process as an opportunity to

advance a shared vision for a resilient, carbon-neutral metropolitan region. Strengthening the CCAP through the recommendations outlined above, anchored in systems integration, policy coordination, and equity—will accelerate progress toward Minnesota’s 2050 net-zero goals while improving health, affordability, and opportunity for all residents.	
Chisago County staff comments	
Transportation – Focused on urban area strategies – many residents in Chisago County commute into the Twin Cities region; longer distances and less transit access pose major challenges. Alternative nuanced strategies might include remote work incentives, and understanding the reasons residents leave the county for work (better wages, career opportunities, etc.) and work to address these issues may be more applicable to the county. Collaboration between towns for small-scale transit services in more rural areas. Are freight corridor emissions tracked separately? So as to break this out into local vs through-traffic measurements when it comes to metrics for tracking progress within the County. Electrification – Already mentioned in the plan but emphasizing access to regional/federal/state grants or incentives as upfront costs can be a barrier for many (for example, incentives for home electrification, whole-home energy assessments, community solar, trail building, EV chargers). Natural Areas –For Chisago, there is definitely an emphasis on green spaces and protecting our water bodies, considering things like shoreline vegetation buffer	Thank you for your feedback. We have made edits across strategies to incorporate your comments. Regarding the question about freight corridor emissions, freight emissions originating from freeway and state highway corridors are not separated out from local and county roads. We recognize such pass-through emissions are out of scope for addressing at local levels and refer to state efforts to decarbonize this subsector.

CCAP PUBLIC COMMENT REPORT

programs, wetland restoration, invasive species mitigation, and forestry management programs for private landowners as part of the Natural Systems strategy.

Agricultural – I appreciate Strategy 15 of investment for local food systems so that small farms can supply local markets, reducing transport emissions. Encourage regenerative agriculture on smaller farms/acreages and partnerships across soil and water conservation districts. For Strategy 13, providing outreach/technical assistance for rural homeowners and acreage owners on best practices (soil health, septic systems, land stewardship).



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