

36416 Pollution Control Agency Notice of Hearing Greenhouse Gas Emissions (Initial Comment Period)

Closed Mar 15, 2021 · Discussion · 448 Participants · 1 Topics · 615 Answers · 152 Replies · 377 Votes

448

PARTICIPANTS

1

TOPICS

615

ANSWERS

152

REPLIES

377

VOTES


SUMMARY OF TOPICS

SUBMIT A COMMENT

 615 Answers · 152 Replies

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Austin Bell · Citizen · (Postal Code: unknown) · Dec 21, 2020 10:57 am

 13 Votes

I strongly endorse this rule change. Transportation is becoming the number one source of pollution and greenhouse gas emissions. Our windows to solve these problems are closing very rapidly. We need these rules in order to ensure a livable future for our children and their children after. Without these rules almost every dealer I've contacted in the state does not carry electric vehicles. We've considered flying to California in order to purchase a car and road trip it back to Minnesota.

Response:

John Harris · Citizen · (Postal Code: unknown) · Jan 13, 2021 11:55 pm

Mr. Bell can you show us proof that transportation is the number one source of pollution in MN?

Response:

Daniel Olsen · Citizen · (Postal Code: unknown) · Feb 05, 2021 7:26 pm

Mr. Bell you fail to take in to account the pollution from the electric plants that have to produce more wattage to charge your electric car. The contamination from the production and waste from the battery in said cars. The inefficiency of using them for the type of transportation that the majority of the people in the state have to rely on. Also the extreme initial cost of said vehicle. California has a totally different environment. It is a extremely bad idea.

Response:

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Russell Jackson · Citizen · (Postal Code: unknown) · Feb 06, 2021 10:47 am
Austin. When you get to CA to get your electric car, just stay there. Are you also willing to give up your cell phone, computer, electricity, natural gas, etc.? I hope you dress warm when you go to work when it is -20 out side.

Ray Phelps-Bowman · Citizen · (Postal Code: unknown) · Dec 22, 2020 8:46 am

👍 11 Votes

1. I believe forcing dealers to carry ZEV's will have little impact on demand.
2. Demand is not constrained by the supply of ZEV's; demand is constrained by the lack of robust charging infrastructure in the state.
3. Where there is charging infrastructure, consumer demand for vehicles follows, even for expensive vehicles - TESLA has proven this to be true.
4. The government would be better served to invest in charging infrastructure for ZEV's to make them a more viable choice for consumers.
5. Forcing dealers to carry inventory for which there is insufficient demand is a waste of resources focused on enforcing a law that won't have the intended effect.

Here is a thought experiment to illustrate why I believe incentives rather than coercion would best achieve Clean Cars Minnesota's goals of more Low and Zero-Emission Vehicles.

Governor Walz, who strongly supports the goals of Clean Cars Minnesota, decides to lead by example. He wants to trade in his gas-powered car and drive a Zero-Emission Vehicle (ZEV) for both personal and government transportation needs, and so he looks at the 2020 Chevy Bolt. The Bolt is smooth and powerful. It is dependable, requires almost no expensive maintenance, has tons of sophisticated safety features, costs about the same as the average car sold in the US, has a range of 259 miles and has a US automaker name plate. The Bolt is an excellent car, and it is available in Minnesota now. Will Governor Walz buy the Bolt?

The short answer is "No". He hasn't bought a Bolt, and he won't buy one! And why won't he buy it? Because Governor Walz occasionally has to drive 200 miles or so one way to the far reaches of Minnesota. The Bolt has the range to get him straight to essentially anywhere in the state except the extreme NW, but, because he cannot count on finding a dependable battery charger, fast or slow, in most parts of the state, he can't count on the Bolt's getting him back home.

If Governor Walz, a strong supporter of Clean Cars Minnesota, wouldn't buy a Bolt to replace his gas-powered car, the average Minnesotan also won't buy one, and for the same reason - lack of available, dependable charging opportunities.

It isn't the lack of availability of ZEVs that make them unsuitable for Governor Walz. It is the lack of dependable charging that badly limits the usability of ZEVs in Minnesota.

One manufacturer of very expensive electric cars is able to sell every car it stocks in Minnesota and even has a waiting list. Currently available, more modestly priced but very capable electric cars should be selling like hotcakes, but they aren't. Availability of vehicles is not the reason for the difference here. The difference here is the existence of dependable charging opportunities. The expensive cars are supported by an extensive, dependable charging network. The moderately priced electric cars are not.

The Clean Cars Minnesota rule is going at the issue backward. The state needs a comprehensive network of strategically placed, dependable chargers. Electric cars will sell themselves. Consumer demand will provide the incentive car dealers need to demand more Low-Emission and Zero-Emission Vehicles from the manufacturers, and this will meet the goals of Clean Cars Minnesota.

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Response:

Austin Bell · Citizen · (Postal Code: unknown) · Jan 07, 2021 10:20 am

The demand is there. Look at all these comments of people who have not been able to purchase ZEVs, myself included. I want to leave my children with a livable future and breathable air, but I can't convince many dealerships to sell me a \$40,000+ vehicle

Response:

Jonna Korpi · Citizen · (Postal Code: unknown) · Dec 24, 2020 1:01 pm

Although statewide infrastructure is important for future mobility -- it is not the limiting factor for EV growth. 90% of vehicle charging is done at home for local commuting and most EV owners who do travel farther distances know that they need to plan for those further trips at this point in time.

We need BOTH: investments in infrastructure and pressure on suppliers to increase availability. Demand is there. See my comment below.

George Hutchinson · Citizen · (Postal Code: unknown) · Dec 22, 2020 11:34 am

👍 12 Votes

Having owned two Electric Vehicles EVs (both Nissan LEAF) and driven them around the metro Twin Cities area it is clear to me that these vehicles are very economical, fun to drive, and very difficult to buy. Dealers are not interested in selling or leasing EVs. Choice of manufacturers and models is very limited. The dealer that we leased our first LEAF from had one person on staff that understood the car. All the other sales people were unaware of the product and uninterested in selling the car. We charge the car at home using a "level 2" charging system installed in our garage. We use it for local travel including work, shopping, child delivery to pre-school, and a host of other tasks. We have used remote charging stations occasionally. These are hard to locate and difficult to use as each one seems to have a unique mode of operation.

I believe the State of Minnesota has a public interest in promoting the use of EVs for the following reasons:

EVs reduce overall carbon emissions.

EVs can be powered by locally produced renewable energy.

EVs provide the same functional transportation while reducing local air pollution (emissions) as fuel burning vehicles which reduces adverse health impacts on our communities.

Promoting the health and welfare of citizens is the most important mission of government. The promotion of the sale or leasing of EVs, support for a public charging infrastructure, and public encouragement of use of EVs will support this mission.

Response:

Susan Landberg · Citizen · (Postal Code: unknown) · Feb 20, 2021 4:58 pm

I, too, am in favor of the Clean Cars Minnesota initiative and I think George has stated it exactly correctly: EVs reduce overall carbon emissions and the most important job of government is to protect the health and welfare of all citizens.

Not only will a reduction in greenhouse gases help fight climate change, but the resulting improvement in air quality will be beneficial for all citizens..

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Poor air quality damages lungs. We are in the middle of a pandemic that can cause severe damage to lungs. Even people who have come through COVID with mild symptoms are finding out later that they have lung damage. The incidence of Multi-System Inflammatory Syndrome in children is rising and will likely have a lifelong detrimental impact on the lungs for those who survive it.

This is no time to get our priorities wrong. We need to do everything we can to clean up our air for the health of our planet and all living beings.

Response:

alan Yang · Citizen · (Postal Code: unknown) · Mar 07, 2021 7:03 am

As the other contributors have stated, I also support the Clean Cars MN initiative. In 2013 we've purchased two hybrids, but the options for PEHV was difficult. When I inquired at the dealership, they stated that due to "legislation" they weren't allowed to carry them. I don't believe it's forcing the dealers to carry them vs. providing customers more options. It feels like options are limited to all electric 50k+ cars (Tesla, Audi, BMW, etc). Hyundai has PHEV and all electric cars that are available in MN. Don't limit options for consumers.

Gary Schettl · Citizen · (Postal Code: unknown) · Dec 22, 2020 4:23 pm

👍 11 Votes

I'm in favor of the Clean Cars Minnesota initiative. My family has already saved \$20,000 in fuel by driving our all-electric cars over 250,000 miles. Making sure electric vehicles are available to test drive on dealership lots is important to selling them & preventing the air pollution originating from the gas cars currently dominating the transportation sector.

Larry Margolis · Citizen · (Postal Code: unknown) · Dec 22, 2020 4:25 pm

👍 9 Votes

I am in favor of this rule change. I have been leasing an EV for over 3 years and support the idea of EVs because they improve air quality, reduce our dependence on fossil fuels, and are cheaper to operate than gas powered vehicles. I am hoping that in the future there will be more EVs available in greater quantities here in Minnesota.

Response:

Dillon Holtan · Citizen · (Postal Code: unknown) · Jan 15, 2021 6:27 pm

Are you aware of how much more pollution there would be from burning coal and other fossil fuels to produce the electricity to charge these cars?

Jonna Korpi · Citizen · (Postal Code: unknown) · Dec 24, 2020 12:58 pm

👍 11 Votes

I am in favor of the Clean Cars Minnesota initiative -- we need to move our state forward in terms of greenhouse gas reduction and not wait for others to lead.

I was recently at a local dealership in NE MN getting an oil change for my 2003 Camry -- a vehicle I bought in college and is still going strong and is in great shape. However, it

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will come to the end of its life at some point and so as I waited for my car, I walked around the showroom to see what was available. Three things I was shocked by:

1. There were no -- zero -- all-electric vehicles in the showroom
2. Out of the 8 or so in the showroom, maybe two were hybrids
3. The fuel efficiency of a 2021 Camry was the same as my 2003 Camry

I'll address the last point first. Gas-powered vehicles are not improving -- they are "as good" as they are going to get in terms of efficiency and yet we are paying more and more for them. This is not smart economically or environmentally and frankly, as consumers, I'm shocked people think this is acceptable and as a citizen of the planet, I wish there were better options. Oh wait, THERE ARE!

To go back to the first two points -- I asked one of the salespeople -- "Do you have any of the all-electric Toyotas somewhere?" He almost laughed at my question -- gave a vague answer about lack of infrastructure -- and said maybe we (MN) would get some in a few years. I was not satisfied with this answer -- one, because 90% of EV charging is done at home, so the need for infrastructure is less important if your primary driving is a local commute (which for most of us, it is) and two, our local utility, MN Power, even offers incentives for people who charge EVs at home to make it more economical than it already is!

So, I followed up with another person on the sales team and she explained that supply was limited and that MN was not a high priority on the list to get all-electric vehicles from Toyota, even though demand was high. She also mentioned that they had taken down payments on some new EVs and had to return people's money because they couldn't get the vehicles from Toyota.


There is something goofy in the chain here -- in terms of demand, we've got it in spades and as noted by other commenters, people are willing to go to other states to get these vehicles. So what the heck is going on with supply and why can't we get the vehicles? Obviously, we need a rule passed like some of these other states to put us higher on the list of who gets these vehicles which are in high demand but low supply -- and which may also give these car manufacturers the extra nudge to shift more production to EVs to meet the demand and move away from the "safety" of combustion engines as their bread and butter product.

Response:

Daniel Melton · Citizen · (Postal Code: unknown) · Jan 29, 2021 3:59 pm

You want to live under california emission laws, move to california

Robert Hoke · Citizen · (Postal Code: unknown) · Dec 26, 2020 8:50 am

 11 Votes

I support this initiative. Electric vehicles need to be available and accessible. They are proven to be better for the environment and safer for the occupants if involved in a collision. Please listen to the Minnesotans that are commenting on here and know they represent a larger constituency

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Michael Johnson · Citizen · (Postal Code: unknown) · Dec 29, 2020 10:32 am

👍 8 Votes

Electric cars are better vehicles and we should do everything we can to offer everyone in Minnesota an opportunity to choose an EV. Right now, the EV availability is poor at dealers and we need to change that. I tried to find an EV car in Sept of 2019 and there just were none available that I might be interested in. We need more plug-in stations across the State and nation. We need to do everything possible to allow greater production of these vehicles to make them less costly to purchase for the average buyer.

Paul Knutson · Citizen · (Postal Code: unknown) · Dec 29, 2020 3:55 pm

👍 7 Votes

I live on a very heavily travelled rural highway where older cars and trucks have noticeable exhaust pollution at my farm building site. I thought we had solved the pollution issues with catalytic converters. But they either wear out or are modified to let a higher level of pollutants out of the exhaust. So, I'm convinced that the only way to solve our increasing air pollution and our extensive use of carbon fuels that are rapidly warming our planet is to eliminate gasoline and diesel engines. There are competing technologies that can provide all the fuel needed for transportation and off-road vehicles such as battery vehicles and hydrogen vehicles.

If our society adds in the external costs of air pollution from increasing health care costs and the infrastructure damage from more intense storms and total precipitation, the annual cost of a ZEV is basically the same as for carbon fuel vehicles which are subsidized by current laws. The transition may seem daunting, but with current technology is feasible and necessary. We must make decisions that will positively affect our children and grandchildren. We cannot continually take more from our earthly home than what we put back. Now is the time to make this tough decision and move our society forward in a manner that guarantees a bright future. Thank you!!

Response:

John Harris · Citizen · (Postal Code: unknown) · Jan 13, 2021 11:53 pm

Do you have proof to support your statement?

Eric Forsberg · Citizen · (Postal Code: unknown) · Jan 02, 2021 10:12 am

👍 7 Votes

I support the proposed Clean Car rules. We need ZEVs to reduce Co2 emissions and other forms of pollution. I would like to buy reasonably priced electric SUV. I am tall (6' 4") and the mid priced ZEVs available in MN are not comfortable for me.. The cars that I am interested in buying are not currently available in MN. The proposed rule will make ZEVs more available.

Bruce Anderson · Citizen · (Postal Code: unknown) · Jan 03, 2021 5:07 pm

👍 8 Votes

I agree with the proposed regulation. I visited every dealer in St. Cloud when I was

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looking for an EV last year. Only one could possibly get one, but the dealership carried none in stock. At the Chevrolet dealer, salespeople had no information on the Bolt, thought that it might not be sold in Minnesota. In short, no local auto dealer had an EV, let alone an EV with at least 300 mile range in early 2020.

Tesla was my only feasible solution, requiring a trip to Eden Prairie. Tesla has an excellent network of fast charging stations mostly near interstates. I easily drove my Tesla to Oregon and back this summer. Unfortunately, the same can not be said about planning a trip to the Canadian border.

For in-town use, EV batteries can be charged by a standard 30 amp garage circuit. For trips to the cities or Rochester, Superchargers (Tesla only) along the way provide a quick boost. Off this beaten path, chargers can be found by an app, but they are usually much slower than the Tesla superchargers. Minnesota definitely needs more fast chargers that can get you back on the road in 30 minutes. And the Biden administration is committed to installing EV chargers. Minnesota should work with the Biden team ASAP.

Over the next year, every major manufacturer will be offering EVs, including sedans, SUVs, and pickup trucks, some with range as good or better than my Tesla. If manufacturers are required to stock EVs outstate, they will have an incentive to develop charging stations outstate. The state should collaborate with manufacturers to assure both wide coverage, brand-independent capabilities, and fast charging.

Dealers are reluctant to offer EVs because the lack of maintenance revenue changes their business model. Dealers need time to make the transition in their business model. The requirement as proposed will permit them time to do this.

Minnesotans deserve choice - without going to the Twin Cities to test drive a vehicle.

Recent statistics show that Americans are keeping their vehicles between 8 and 12 years. Thus a new car purchased in 2021 may very well be still on the road in 2030. The state has an interest in assuring that the majority of those vehicles in 2035 are EVs. We need to start now.

Norway has made EV purchase a priority, with incentives - including tax breaks, HOV lane access, discounted parking and ferry passage - to encourage EV purchases. In September 2020, 61.5% of new car sales in Norway were plug-in EVs. Including hybrids, the percentage moves to 89%. Minnesota needs to encourage EV purchases now if vehicles on the road in 2035 are to be fossil fuel free.

And it isn't just Norway. Curbside chargers in Rotterdam - for folks without garages - and EVs are plentiful. We can do this in Minnesota, but need a push from the state.

Response:

Diane Bublitz · Citizen · (Postal Code: unknown) · Feb 13, 2021 4:14 pm
Totally support your comments

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Dave Quady · Citizen · (Postal Code: unknown) · Jan 07, 2021 12:57 pm

👍 6 Votes

As an EV owner for the past 4+ years, my EV has over 136K miles, and I am a huge outdoors advocate it is time to move this forward. We can not continue to utilize fossil fuels, a stand must be made in a direction that will lower our overall use of fossil fuels.

I'm also disappointed that the dealers associations aren't embracing true clean auto advances in the vehicles they can and should be offering. It certainly seems that it's all about the profits for the dealers - they don't make a ton on the current ICE vehicles however they make a ton on service and, as we all know, service is significantly less for EV's. It's all about the profit margins.

Let's not let climate change continue to screwup our nature and the wonderful outdoor life that we enjoy here in Minnesota.

Brian Nerbonne · Citizen · (Postal Code: unknown) · Jan 07, 2021 8:47 pm

👍 7 Votes

I am excited about the possibility of bringing more choice in EVs to Minnesota. My partner and I have been considering buying an EV, but the options are limited mainly to very expensive options like a Tesla, or lower-range options like the Leaf. There are some great options out there available in states like California that combine a good range, practical size, and affordable cost. We will totally take the plunge and buy an EV once these more affordable but practical options become available. Sadly, the car companies seem to need a push to provide these cars to states like ours.

Private vehicles make a large percentage of greenhouse gas emissions in our state. We are not going to meet goals for reducing emissions unless see a much bigger adoption of EVs. Providing better options for drivers will help that to happen, and as more people are driving them the charging infrastructure will also become more in demand and will encourage more development on that front. It is a process that will be self reinforcing, and will make it easier each year for others to make the switch. Thank you, MPCA for taking this tangible step toward addressing climate change, an issue that I see as a huge threat. We need to act to head off the worst impacts while we still can.

Brian Anderson · Citizen · (Postal Code: unknown) · Jan 12, 2021 9:33 am

👍 5 Votes

I support Clean Cars Minnesota. Clean car standards aren't new. They're an established and credible way that states can work to clean up pollution, including greenhouse gas emissions, from transportation. Fourteen other states and the District of Columbia have already adopted clean car standards which are a common-sense way to encourage automakers to increase the supply of these vehicles. As an electric vehicle driver for over 5 years, I can confirm that they are superior to internal combustion vehicles for a large majority of Minnesota driver uses and will save Minnesotans money. We need this rule to make more electric vehicles available to Minnesotans so all can benefit.

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william Burleson · Citizen · (Postal Code: unknown) · Jan 12, 2021 1:13 pm

👍 6 Votes

I fully support the “Proposed Permanent Rules Relating to Clean Cars” currently proposed by the MPCA, including and especially 7023.0300 zero-emission vehicle standards.

This issue hits close to home, as this fall I started a search for a new car. After doing a good deal of research, I had a strong preference for a Hyundai Ioniq plug-in hybrid. Off to the dealer I go, only to find out these cars are not available in Minnesota. Why not? I was told because they are only available in states with California emissions laws.

Ridiculous.

The talking points from the car industry is that people don't want ZEVs, that they only want trucks and SUVs. Well, here I am, so I know that's not true. More likely the car companies are one part stuck in the past and one part resentful for ever being told what to do. Both terrible reasons to shape policy.

Meanwhile, I'm holding off on a new car, until I can either drive to California and buy one, or Hyundai wises up.

Response:

Blake Stillwell · Citizen · (Postal Code: unknown) · Jan 13, 2021 9:35 pm

I need 4wd. I need reliable winter transportation. These cars will be boat anchors when Minnesota winter weather sets in.

Nancy Wiens · Citizen · (Postal Code: unknown) · Jan 13, 2021 11:09 am

👍 6 Votes

I support the MN Clean Cars rule proposed by the MPCA. My family wants to own and drive 'clean' cars to support the lessening of global warming emissions. However, when we recently purchased a new vehicle, the type of plug-in/hybrid SUV that we wanted to buy was not sold in MN. We had to compromise with a non-plug-in hybrid because that was all that was available. We want more 'cleaner' options in MN. The MN Automobile Dealers Association may like to pretend that Minnesotans mostly want to drive non-ZEV full-size pickups and SUVs, but they are not speaking for us.

Response:

Blake Stillwell · Citizen · (Postal Code: unknown) · Jan 13, 2021 9:36 pm

I need 4wd. I need reliable winter transportation. These cars will be boat anchors when Minnesota winter weather sets in. These replies seem unoriginal....

Blake Stillwell · Citizen · (Postal Code: unknown) · Jan 13, 2021 9:31 pm

👍 15 Votes

I oppose this rule. Electric production is often times more harmful to the environment, in by-products emissions and waste and is not yet near carbon neutral. This will make private transportation far more costly for the average Minnesota and put reliable winter transportation out of reach for many.

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Response:

Laurie Desiderato · Citizen · (Postal Code: unknown) · Feb 01, 2021 3:44 pm

I live up here in Bemidji where we have plenty of winter weather. I have been driving a plugin hybrid for about 4 years - in snow and cold weather - with no problem. I plug in at home and charge at night when the demand for electricity is low for just a couple of bucks a charge. I can't even remember the last time I bought gas. Check out the recent New York Times article that examined the lifetime cost of gas, hybrid, and electric cars. You will find that these cars are cost effective as well as much better for the environment.

Response:

Kris Anderson · Citizen · (Postal Code: unknown) · Mar 10, 2021 7:01 pm

I agree with you Blake I oppose this rule.

Josh Keil · Citizen · (Postal Code: unknown) · Jan 13, 2021 10:06 pm

👍 16 Votes

I don't think MN should adopt this policy. I think the costs of what this will do to the citizens of this state will be too great for the average person to overcome. Vehicles are already overpriced as it is. If you mandate that ev and lev are to be sold at a cost to the dealer, the dealer will suffer and then pass that suffering on to the consumer, who will then suffer. They will pay the price at cost of sale and at the gas pump. This will be taking more money out of working peoples hands. Also if this is mandated for heavy duty vehicles, the owners and businesses that operate these heavy duty vehicles will raise their rates. This is a cost that will be passed onto the consumer also. Prices where goods need to be delivered will be raised, prices for all services that require heavy duty vehicles will go up. Also this should be put to a vote for the citizens to decide. I've never even heard about this mandate until I saw this post. Which is a reason it should be voted on. I'm sure there are a lot of citizens that don't know this is happening. When Tim Walz was campaigning for office he ran on saying he was going to raise the gas tax, which is why I did not vote for him. Citizens should not be told what vehicles they have to drive.

Response:

Daniel Thornby · Citizen · (Postal Code: unknown) · Mar 03, 2021 11:50 am

This does not eliminate petro vehicles and does not require anyone to buy an EV. The demand for EVs is here and this will simply help those consumers have options. As far as those of us who drive petro vehicles, the regulations will create better fuel economy in vehicles and save us money.

John Harris · Citizen · (Postal Code: unknown) · Jan 13, 2021 11:52 pm

👍 10 Votes

I strongly recommend that you do not adopt this policy. The people of MN cannot afford to adopt these policies. The staggering cost to the average Minnesota would be overwhelming especially for a person of color as myself. The overwhelming tax burden we already have is causing extreme hardship especially during this time of Covid-19 when many Minnesotans are struggling from losing jobs and homes, and paying hospital bills. Minnesota already is in line with the Paris Climate regulations, so there is no need

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to burden Minnesotans with un needed regulations. Thank You for your time and have a blessed day!

Response:

don berre · Citizen · (Postal Code: unknown) · Feb 01, 2021 4:30 pm
I agree

Ronald Anderson · Citizen · (Postal Code: unknown) · Jan 14, 2021 6:36 am

👍 11 Votes

This proposal is ridiculous and just another way to hurt lower income and rural living families with unsubstantiated excessive regulation. This governor must be stopped. This is nothing less than an abuse of power and a way to take more money out of hard working Minnesotans pockets.

Response:

John Harkness · Citizen · (Postal Code: unknown) · Mar 15, 2021 1:47 am
Under the proposed new rule, rural people are not required to purchase electric cars. The rule just makes them more available to those who want them.

Tanya Peterson · Citizen · (Postal Code: unknown) · Jan 14, 2021 1:44 pm

👍 10 Votes

I strongly disagree with the green act. Minnesotans can't afford this. This is by far the last thing that needs to be addressed. Hurts anyone that does Motorsports. Which is a family event. I believe people would move if they had to. Electric vehicles are Harding on towing companies and more dangerous to take care of if they need assistance. The batteries are very expensive. It's all around more expensive in the end.

Response:

Daniel Thornby · Citizen · (Postal Code: unknown) · Mar 03, 2021 11:53 am
Tanya,

This does not eliminate current petro vehicles and does not eliminate the sale of new petro vehicles. Manufacturers of petro vehicles will need to meet stricter emissions standards which will, most likely, be met by increasing fuel efficiency which is good for everyone. No one will be forced to buy an EV. There is plenty of demand for the small increase we hope to see with this legislation.

Response:

John Harkness · Citizen · (Postal Code: unknown) · Mar 15, 2021 1:51 am
Electric cars are all-around less expensive than gasoline cars.

Alyssa Lee · Citizen · (Postal Code: unknown) · Jan 14, 2021 7:39 pm

👍 26 Votes

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I strongly OPPOSE adopting this rule as it could have future consequences that will negatively impact small dealerships, and will only increase the costs of owning a car. Even if a rule like this were to actually reduce emissions, the difference would be so minuscule it would be hard to actually measure and pinpoint how that's being done. To adopt a rule like this is insanity. Minnesota is not California and never will be. Our lifestyle is completely different up here, and so is our cold climate. Below I will give many reasons as to why this is not a good rule to adopt.

1. Do not force people, or dealerships to purchase something that won't sell. If you want Minnesotans to buy electric vehicles you need to do it as an incentive. Incentives will sell themselves if they are truly everything they say they are. For example, if the government truly cares about electric cars they could start by providing rebates for those who buy electric cars, or providing grants to those who buy electric cars and purchase charging equipment. Incentives are a better way to measure how many people are on board, without actually harming others in the process. Especially in Minnesota, you will probably find that many people who want electric cars are in the metro area. So, dealerships in the metro area are the only ones who are likely to benefit as the charging structure is most readily available in the metro area.

2. About 55% of Minnesota's population lives in the twin cities metro area. This is the area in which would probably mostly support adopting this rule. However, the rest of Minnesota that lives beyond the metro area would be negatively affected by this rule. Many people that do NOT live in the metro area can often travel hours each day for work, appointments, and other errands. As a small business owner, I often travel hundreds of miles to provide a service. Often going to remote locations, and often times needing four-wheel drive and stopping to fuel up at least once. Having to rely on an electric vehicle would be very concerning in my circumstance, and for many other people that live in northern Minnesota.

3. The charging infrastructure is not here. If you have no way to charge your electric vehicles, they will not sell, nor will you be able to travel. This will only hurt dealerships, especially the dealerships not in the metro area. Electric vehicles will end up sitting on lots and not being sold. AND even the people that do buy electric vehicles will have a very difficult time finding a place to charge them. Adding more charging infrastructure is only going to cost Minnesotans more, and provides no guarantee to actually helping reduce emissions. To set up and build these charging structures would be costly and would require the use of emissions and fuel for initial set up. AND would come at taxpayers expense. How much money is needed to do that? How much fuel and emissions are created in setting up charging infrastructure?

4. People often forget that just because an electric car doesn't produce emissions right in front of you, that doesn't mean that emissions aren't produced in order to "run them". Minnesota currently gets 30% of their energy from coal, 30% of their energy from nuclear, 20% of their energy from wind, and 20% of their energy from natural gas. If people think that electric cars are going to actually stop greenhouse gas emissions, they're crazy. Your electricity needs to come from somewhere, and using an electric car will still make emissions because in order for the car to receive electricity, that electricity needs to be made by other sources. AND even though there's still a push to move to solar and wind energy sources, they are often unreliable and not as "green" as they claim to be. For example, wind turbine blades will often end up in landfills after being used, or when they are no longer deemed fit. There are only certain landfills in the midwest that are willing to accept them. To transport and create these blades takes A LOT of fuel. To actually make an entire wind turbine, many parts have to be hauled individually by semi trucks. Many people push for wind energy but they don't realize the

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costs and greenhouse gas emissions that go into creating these ginormous structures that are not very efficient in terms of length of life. Same goes for solar panels. They don't last very long, and are very expensive. After years of use, they end up in landfills contributing to the pollution problem too.

5. Even if more charging structures were created around the state, many people would have to resort to charging their electric vehicle at home. The average vehicle takes about 6 to 12 hours to reach a full charge. Faster chargers are available, but are more costly and can be harder on the battery. This is similar to any lithium ion battery. So in terms of getting the most out of your electric vehicle, fast chargers are not the best. People also forget that electricity companies have on peak and off peak times. People who charge their vehicle when electricity is in high demand, are going to be charged more. On peak hours are typically 8:00 a.m. to 10:00 p.m. in Minnesota. Electricity costs in Minnesota are increasing. And if we look at Xcel's future plans for creating electricity in Minnesota, the costs are going up substantially. And when it does, many people are going to feel the heat of an increasing electricity bill, making electric cars even less desirable.

6. Lithium ion batteries do not perform well in cold weather. This is true with any electronic device that uses lithium ion batteries. And over time these batteries will eventually stop holding a full charge. Minnesota has some of the coldest winters, which makes electric vehicles a big gamble for a Minnesota driver. For anyone that would try to travel more than 150 MI, in Minnesota, when we have Sub-Zero temperatures, could lose battery power quickly and to have to stop and charge. This could add hours onto a trip. And in an emergency situation, there is no way to quickly charge an electric vehicle with a dead battery. Since lithium ion batteries don't last forever, and can perform worse and worse over time, they don't last long. This also creates a recycling problem. Where will these batteries go? Have we thought that far ahead? If these batteries are the sole purpose in making these engines work, but they cannot survive that long, how does that actually make them a more "green" choice? Lithium ion batteries also do not do well in extreme heat, this can actually harm the battery permanently. Minnesota does not have an ideal climate for lithium ion batteries. Oftentimes we are in extreme cold, or extreme heat. People often forget too, that gas powered engines produce heat, and when they produce heat that heat gets used more efficiently in the winter. Most of that heat is blown up into the cab, especially during the winter months. However, in an electric vehicle, not much heat is made while running. Therefore an electric vehicle would have to work even harder to heat the cab area during colder spells. This would result in much battery usage.

7. The other part that's concerning about this rule, is that we would have to follow the exact rules that California makes. This is very concerning. If Minnesotans truly cared about the state of Minnesota, why aren't we making rules specific to our state. Like mentioned above, we have a very different climate. And what works in California will not always work in Minnesota. There's a much better way to go about this than adopting another state's rules. This could have grave future consequences depending on what California decides to do in the future. Who knows what that'll be and how much that'll cost. Does California actually take into consideration Sub-Zero temperatures? Does California consider where will all these batteries go once these cars are deemed useless? Does California consider the needs of people that have absolutely no use for an electric car? Does California realize how costly these vehicles are, especially to low income families? Does California realize that electricity costs are only going to continue to increase? If we continue to add rules and regulations like this, how many other rules is MN looking at to add? What happens if regulations like this are put on farm equipment? How much will that raise the costs of food and the prices of simple essentials? Will rules like this lead to something like CARB in California? Have Minnesotans thought about that? Do they know all the rules and regulations that go along with CARB? Do they

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realize rules and regulations like this will cause the cost of living to increase exponentially, especially as more rules get added? I hope Minnesota is asking these questions.

8. The cost of owning a vehicle today is expensive. Adopting rules like this will only hurt low-income families that are trying to get a vehicle. If dealerships would be required to have electric vehicles in their fleet, but they don't sell, those costs will just get passed on to the consumer. Therefore it's making the cost of owning a car go up substantially. Not only would dealerships pass these costs onto their consumers, but it would create more paperwork for them. Many people rely on small dealerships outside of the metro area for services. Increasing costs and demands on already struggling dealerships could cause many dealerships to close. This would do a huge disservice to many people outside of the metro area. Families in Minnesota are simply looking for an affordable and reliable car. They want something that can carry everyone, while being practical. An electric vehicle for a family that travels frequently whether the car is used for work travel as well, is simply not practical at all. An electric vehicle for Minnesotans would then become a luxury item. Partly because many Minnesotans would not drive their electric vehicles in the winter because they are unreliable in cold weather. The battery drains fast making them difficult to use. People won't be buying a vehicle to only use for half the year. Families that are trying to find a reliable vehicle will not choose electric vehicles. They are going to save money for other essentials. They also want a dependable vehicle for emergency situations. Having to get some where with a dead battery is impossible. Having to get somewhere in a pinch is possible with a quick stop at a gas station. What happens when we have a widespread power outage? For multiple days? Weeks? Relying on electric cars won't work. So, the people that will be buying an electric vehicle are people that have extra money to spend. Therefore, again this is only doing a disservice to low income and middle class families.

9. Dealerships will have to equip themselves with being able to service and fix on electric vehicles. Right now many dealerships do not have all the equipment, nor do they have the technicians that are trained to correctly service them. This would cost more money for the dealerships, which in return would be passed on to the customers. The training process and the amount of equipment needed to fix on electric cars would be time consuming and costly.

10. It's very frustrating this rule is being swept under the rug and avoiding MN legislation. Many people have no idea this is occurring or even being discussed. I haven't seen any coverage about this in our local news. I haven't seen any press releases about the rule or rule making process in any local newspapers. Nothing. Not. A. Word. How are people supposed to voice their opinion on this if the coverage of this issue is practically hidden? Our legislators don't get an opportunity to debate on the issue, so even some of them are in the dark. This is a rule that would affect ALL Minnesotans. So, why isn't there more coverage of this? This rule should be abandoned simply because of the lack of coverage and lack of input from across the state.

11. We can spend time putting together graphs and saying how this will be such a great rule. We can look at other states and say we'll hop on the bandwagon. We can fall for the green lingo that's often pushed so hard. OR we can take a step back and analyze what's really the best thing for Minnesota. If people really, truly want to help the environment, an electric car is not going to do much of anything in the long run. This would just create more rules and regulations without any lasting benefits to our state. The best thing to do in this circumstance would be to drop the rule completely, and leave Minnesota dealerships alone. Let them decide which types of cars are best suited for their fleets. I've already spoken with our workers at local dealerships and they are worried about what this could do for the cost of owning a car for the average consumer. If people truly want an electric car, many dealerships are happy to work with you on getting one to

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their shop. Often times dealerships have access to dealerships around the state and other surrounding areas, and many vehicles can be shipped to your desired location for pickup. The ability to get electric vehicles is already here. Minnesota dealerships just aren't ordering them in because they know they will not sell, especially because of our climate. If electric vehicles are really that great they will start to sell themselves, and dealerships will catch on, and react appropriately. Let the dealerships do what they need to do, and leave them alone. And, leave Minnesota vehicle owners alone too.

Response:

Daniel Kessem · Citizen · (Postal Code: unknown) · Feb 04, 2021 8:46 am
Well stated! The Gov is circumventing the legislative process and the public transparency/scrutiny that comes with a full set of hearings in each body.

Response:

Daniel Kessem · Citizen · (Postal Code: unknown) · Feb 04, 2021 8:45 am
Yes, well stated - I agree we DO NOT need this.

Response:

Kris Anderson · Citizen · (Postal Code: unknown) · Mar 10, 2021 7:04 pm
I also strongly oppose this ruling. Your points are well stated and accurate.

Response:

Steven Langlie · Citizen · (Postal Code: unknown) · Feb 01, 2021 1:26 pm
Very well stated and i agree.

Response:

John Harkness · Citizen · (Postal Code: unknown) · Mar 15, 2021 2:50 am
To respond to Alyssa Lee's 11 reasons for not adopting the Clean Cars Minnesota rule::

1. The new rule will not force people to do anything.
2. Rural residents will still be able to buy and drive gasoline vehicles.
3. Charging infrastructure is growing rapidly and will continue to grow with the increasing number of electric vehicles.
4. Even when coal is one of the electricity sources, electric vehicles generate less overall emissions than gasoline vehicles. For those who power their electric cars by renewable energy, which is rapidly growing, emissions from driving are zero.
5. Charging an electric vehicle at home is as easy as plugging a cord into a wall socket, and can be done without purchasing any extra equipment if desired.
6. Gasoline engines lose more efficiency (gas mileage) in cold weather than lithium ion batteries lose in range, not accounting for the need to heat the interior of the car. The range loss in winter in electric cars depends mainly on how high the heat is turned up. Electric vehicles always start in cold weather because there is no engine to start. All vehicles eventually fail. The typical lifespan of a electric car battery is currently about 15 years. And the battery will likely be repurposed after that, not put in a landfill. Battery life will increase as the technology improves, because electric cars are just in their infancy right now.
7. We aren't doing what California tells us. They were just the leaders in this effort. We are making our own rules in Minnesota. The majority of Minnesotans support

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protection of the environment.

8. Due to superior reliability and efficiency, the total cost of ownership over the life of an electric vehicle is lower than for a gasoline vehicle.

9. Dealers will need fewer service technicians which will save them money.

10. Plenty of coverage of this issue arrived at my mailbox. There have been public hearings and this opportunity for comments, which is not true for many issues our government rules on.

11. The new rule will benefit Minnesotans. Our children and grandchildren will suffer if global warming continues unchecked. Greenhouse gases come from billions of people and everyone needs to reduce their own contribution to it. Just like voting in an election, one vote doesn't change the results but many votes together do.

Response:

don berre · Citizen · (Postal Code: unknown) · Feb 01, 2021 4:32 pm

You sated this very well and I totally agree

Response:

ELAINE HANSON · Citizen · (Postal Code: unknown) · Mar 15, 2021 10:03 am

Very well put! I too DO NOT support this rule, especially if they are from California.

California is a mess. Some say that it is a choice, but we know how well choices soon become mandates under Walz.

Deborah Gramenz · Citizen · (Postal Code: unknown) · Jan 15, 2021 9:57 am

👍 12 Votes

I strongly appose adopting this rule. It should go through the legislature not a back door sneak because its unpopular! The people of Minnesota can not afford this especially low income and rural. This will hurt everyone!!!

Response:

don berre · Citizen · (Postal Code: unknown) · Feb 01, 2021 4:33 pm

Yes this is something that should go through the legislature, and not through this rue making process

Catherine Chayka · Citizen · (Postal Code: unknown) · Jan 15, 2021 12:29 pm

👍 6 Votes

I strongly support changes to reduce vehicle carbon emissions, but as noted by others, two obstacles currently exist: lack of charging infrastructure and insufficient availability of LEV and ZEV. In my last vehicle purchase, I had fully intended to buy an EV but the choices in Minnesota were extremely limited. My job also requires travel to all four corners of the state but charging stations outside of metropolitan areas are few and far between. It is past time to change this.

I think those who oppose the push for EVs are short-sighted. If you build it, they will come. Let's build it.

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Larry Weiss · Citizen · (Postal Code: unknown) · Jan 15, 2021 3:49 pm

👍 6 Votes

I strongly support the rule change. I am only concerned that it sets the required EV percentage of cars sold too low. MN is not reaching even its existing GHG goals. It is well past time to take stronger action.

Dave Jungst · Citizen · (Postal Code: unknown) · Jan 15, 2021 3:53 pm

👍 8 Votes

I'm in favor of the Clean Cars Minnesota initiative. There is a definite need to improve the availability of electric vehicles, especially the most popular types : SUVs and trucks. In March we purchased a new 2020 Bolt crossover from Marthaler Chevy in Glenwood for \$28,000 and really like it. Simple and easy to drive (I especially like the "L" drive, one pedal driving mode), almost no maintenance, incredibly quick acceleration at any speed, quiet, and zero emissions (no carbon-monoxide poisoning concerns inside the garage or anywhere), and we are using some of the excess electricity produced by our own 10kW solar array. I purchased a level 2 charger on-line and installed it in our garage myself. So far almost all of our charging has been at home since, due to the corona virus pandemic, we have not been doing as much long distance travel, but are looking forward to it. I would like to replace my diesel farm truck with an electric one and hope more models and competitive options are available in the near future.

Another positive step the state of Minnesota could take : install electric vehicle charging stations at DNR and MNDOT stations, parks, and offices across Minnesota for DNR, MNDOT, other state agencies, and public use. It would be a logical, tremendous boost to the state's charging network, especially in more remote areas.

Response:

Steven Langlie · Citizen · (Postal Code: unknown) · Feb 01, 2021 1:28 pm

I would suggest you do the research on environmental problems now and in the future with there batteries, electric motors and the wiring.

Response:

Lisa Cardenas · Citizen · (Postal Code: unknown) · Mar 11, 2021 9:59 pm

Let's be sure we can spend the billions on battery waste and disposal!! I'm all for having options, to each his own, but I don't like they way this is being pushed through.

Dillon Holtan · Citizen · (Postal Code: unknown) · Jan 15, 2021 6:24 pm

👍 12 Votes

I am against the legislation to require electric vehicles. For all those who think this will cut back on emissions don't understand what is involved to gather the materials needed to develop batteries for electric cars and also don't consider how much more electricity usage people will have, which the number one source of electricity is burning coal.

We are not California, we need to stop trying to follow the lead of those baffoons.

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Response:

Dave Henseler · Citizen · (Postal Code: unknown) · Jan 18, 2021 8:12 am

There is a lot of research and data that shows that isn't true, see the following:

- <https://blog.ucsusa.org/dave-reichmuth/are-electric-vehicles-really-better-for-the-climate-yes-heres-why>

- <https://www.ucsusa.org/resources/cleaner-cars-cradle-grave#ucs-report-downloads>

Dave Henseler · Citizen · (Postal Code: unknown) · Jan 17, 2021 2:29 pm

👍 9 Votes

In 2020 when I bought my first EV I was not able to test drive much less purchase a Hyundai Kona EV because they are not available in Minnesota. I eventually settled on a Chevy Bolt but even those were in limited supply. While dealers would need to have cars available to see and test they could sell from a regional pool of vehicles shared by multiple dealers. The dealers decide how much inventory they want to carry.

With respect to charging, I think that home (e.g. overnight) charging is much more important than public (especially long distance) charging for several reasons:

- Even the most capable EV will only fast charge to 80% capacity to maximize battery life (the last 20% charges much slower). On a long trip charging for 30 to 60 minutes every 200 to 300 miles will take too much time for many people.

- Average daily travel is 40 miles (before you ask see <https://www.bts.gov/statistical-products/surveys/national-household-travel-survey-daily-travel-quick-facts>), allowing for charging every 3 to 5 days depending on the car and weather.

- For families with multiple cars, replacing one car with an EV and using the second car for long trips would be a good compromise. In my case I swap cars with my kids when I need to.

So for charging it would make sense to incentivize home charging, especially for multiple family dwellings like apartments. Additionally home charging can be done at night when there is more unused grid capacity available.

I strongly support this rule change. You have to start somewhere, and between wind and solar (and nuclear, hydro, etc) we already have the technology to decarbonize the electric supply (with wind and solar on track to be most economical). And we have the technology to decarbonize automobiles.

And as Gov Walz has said, you can buy any car you want - this rule change is not forcing anyone to buy an EV, only making it easier.

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Travis Sonsalla · Citizen · (Postal Code: unknown) · Jan 18, 2021 12:34 pm

👍 11 Votes

This proposed ruling is dangerous. Minnesotans will be giving up control to California for deciding how environment and vehicles should be legislated. We won't be able to have any say in what our state should be doing, California will, and we can only follow along.

The claim that you can be any car you want is unrealistic when non-EVs are forced to be either more expensive or limited in availability. Sure, I can buy a Tesla, but realistically is it affordable?

My wife and I have driven a hybrid vehicle for over 16 years, but our 2nd vehicle is not. Why? Simply because the 2nd vehicle was more affordable than another hybrid. This type of choice goes away when costs and restrictions are pushed.

I'm tired of government continually shoving more expensive solutions at a climate change problem that is only a problem when the climate change enthusiast's models don't match up to reality. There will always be variations in weather patterns and to harm the well-being of Minnesotans based on inaccurate models and limited, directly observed weather data of 160 years or so is dangerous. We love to say things like last year was the 2nd hottest year recorded, but we ignore that a few years back we had a 14 year stretch where temperatures were stagnate and not climbing.

We need smart, realistic practices for reasonable pollution control. This ruling is far from it. Control goes to bureaucrats in California, vehicles are made more expensive, consumer choice is forced elsewhere by fiscal and availability constraints. We are told electrical vehicles will help control pollution, but meanwhile electrical production continues to pollute. Not just coal, but wind and solar, too. How much pollution is generated to make wind turbines and solar cells? Plenty!

Response:

Lisa Schreifels · Citizen · (Postal Code: unknown) · Mar 12, 2021 5:44 pm

The control isn't ceded to California. Minnesota is adopting portions of the California rule. Minnesota only has two choices according to federal policy. Either adopt the California Rules or the EPA's. As the EPA standards were lowered in 2020, Minnesota's only choice to maintain the tailpipe standards we already had in place was to adopt California's.

The EV portion is the new part and requires estimated 7.5% of new car sales starting with 2025 models. An electric vehicle powered with coal sourced electricity still only generates 50% of the emissions of a same sized gas vehicle. That takes into account the emissions from manufacturing.

I wish there was a silver bullet to climate change, but it involves many small changes. That's why I support this rule.

Amy Wroolie · Citizen · (Postal Code: unknown) · Jan 18, 2021 1:04 pm

👍 11 Votes

I oppose the MPCA proposal to adopt the California Air Resources Board LEV and ZEV standards through the Clean Cars Minnesota initiative. I also do not agree with our

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current Governor and his administration taking back door methods to get unpopular agendas into law. This proposal should have been debated in our Legislative branches so the representatives we elect can be the voice of the communities they serve. I feel many Minnesotans are not even aware of this proposal or the economic and tax impact that could occur in their communities. Electric and Low emission vehicles may be great for California but what about rural Minnesota? Many rural Minnesotans travel farther distances to work, they may drive their kids to school and practices daily, may be traversing on county roads where 4WD or AWD is a necessity, and typically drive greater distances for services and appointments than metro area residents. The demand is gas/diesel powered pickups or SUVs in these areas because they are safe, reliable and the cost to purchase and maintain them is lower than an electric car. To purchase a comparable electric vehicle, it would be unaffordable to most. This proposal will make it more expensive for low-income households to purchase private transportation. In northern Minnesota winter, it is common to see single digits and below zero weather for days and weeks at a time. There is reduced reliability for any electric vehicle in these climate conditions. When lithium-ion batteries are used to operate the heater and vehicle at these temps the reliability of the vehicle will be compromised and it will be necessary to charge frequently. The batteries will not perform well when in these conditions. There is no infrastructure in Minnesota to maintain battery life other than your residence. What happens when your daily commute and trips are farther than your charge allows? The proposal should address the investment in the infrastructure which may actually create a demand for electric vehicles but that will likely mean higher taxes which is unpopular with most Minnesotans. Minnesota car dealers will be forced to maintain inventory they may not sell due to little or no demand which will increase the prices of other autos or Minnesotans will travel to other states to purchase autos they want at lower prices. This will not stimulate our economy which has already taken such a hit from covid lockdowns and executive mandates. Minnesota cars are already clean, this proposal will do little to improve air quality, nor will it create a demand for electric autos in our State. Minnesota would have to adopt the California policy and if California decides to change these standards in the future, they will likely only become stricter. It will be cars now but what will next? More regulation for our Powersports and Boat manufacturers? The rules that are implemented now would have a direct impact in many greater Minnesota communities now and in the future.

Mitz Law · Citizen · (Postal Code: unknown) · Jan 19, 2021 5:04 pm

 8 Votes

I stongly oppose the proposal to adopt the ludicrous California Air Resources Board LEV and ZEV standards through the Clean Cars Minnesota initiative. Most especially when our current governor and his administration continue to abuse their power and seem to have completely forgotten that we do not have Oligarchs here.

This proposal should be debated in our Legislative branches rather than put forth by a dictatorial oligarch. Our elected representatives are our voices.

Additionally, Minnesota is not California. Nor should we continue to follow in the economically and environmentally destructive path of California.

This proposal, like so many others, is a cake made of poo and covered in frosting. It low income households and anyone living outside of Hennepin County. Where will all of the electricity to power these lithium-batteried cars come from? What will be done to protect the CHILDREN that work in lithium mines? The damage done to the earth to mine lithium? What kind of energy is going to power these "clean" (LOL) electric vehicles? The environmental impacts and costs are far greater than good old fossil fuels. This push is purely another attempt for democrats to "feel good" about themselves by pushing

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another false narrative, false do-gooder agenda.

Gas-fueled vehicles are far cleaner than they were even just 20 years ago and get better gas mileage. The infrastructure is already in place to support them. A push for electric vehicles requires a huge investment in NEW infrastructure. We have billions of dollars in clean up already on the taxpayers backs for the riots and destruction that our elected leaders allowed to happen for 9 months in 2020. Our politicians need to STOP burdening us with more and more of their pet projects and focus more on the current infrastructure. Stop the insanity.

Catherine Ahrens · Citizen · (Postal Code: unknown) · Jan 19, 2021 5:16 pm

👍 9 Votes

I stongly oppose the proposal to adopt the California Air Resources Board LEV and ZEV standards through the Clean Cars Minnesota initiative also! Not all Minnesotans can afford an electric car nor do they even want one. How can our state afford such a thing after you have had us locked down? So many families and small businesses are struggling just to pay their mortgage and put food on the table. I do not believe our state has a problem with pollution. It is a state of rocks and cows....right? If this goes forward, this will only hurt those who are poor.

Mr Anderson · Citizen · (Postal Code: unknown) · Jan 19, 2021 8:06 pm

👍 9 Votes

I am strongly opposed to the bill. While my personal opinion is that we are a long way from even talking about going away from fossil fuel cars, I am open to the possibility that EV's are an alternate choice, but it's not the government's job to suggest how or what we buy for our cars.. and what happens to the non ev options? I'm sure they will all of a sudden have higher tax fees because they are not the "green" choice? Also in my opinion california is not a state to model after.

Megan Rahe · Citizen · (Postal Code: unknown) · Jan 20, 2021 11:29 am

👍 9 Votes

I oppose the MPCA proposal to adopt the California Air Resources Board LEV and ZEV standards through the Clean Cars Minnesota initiative. I also do not agree with our Governor and his administration taking back door methods to get unpopular agendas put into law. This proposal should have been debated in our Legislative branches so the representatives we elect can be the voice of the communities they serve. Many Minnesotans are not even aware of this proposal or the economic and tax impact that would occur in their communities. Minnesotans should not expect to follow the rules and regulations that are dicated by California's toxic and irresponsible economic enviroment. Many rural Minnesotans travel farther distances to work, they drive their kids to school daily, travel on county roads where 4WD or AWD is a NECESSITY, and typically drive greater distances for services and appointments than metro area residents. The demand for rural Minnesota is gas/diesel powered pickups or SUVs that are safe, reliable and the cost to purchase and maintain them is lower than an electric car. To purchase a comparable electric vehicle would be unaffordable to most Minnesotans. This proposal will make it more expensive for low-income households to purchase private transportation. Winters in northern Minnesota commonly see single digit and below zero temperatures for days and weeks at a time. There is reduced reliability for any electric

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vehicle in these climate conditions. When lithium-ion batteries are used to operate the heater and vehicle at these temperatures the reliability of the vehicle will be compromised and it will be necessary to charge frequently. Lithium-ion batteries simply will not perform well in these conditions. Additionally, there is no infrastructure for greater Minnesota to maintain battery life other than your residence. What happens when your daily commute and trips are farther than your charge allows? The proposal should address the investment in the infrastructure which may actually create a demand for electric vehicles but that will likely mean higher taxes which is very unpopular with Minnesotans given the already high income taxes in our state. Minnesota car dealers will be forced to maintain inventory they may not sell due to little or no demand. Minnesotans will travel to other states to purchase vehicles they can afford at lower prices. This proposal will ultimately put Minnesota auto dealerships out of business. This will not stimulate our economy which has already taken such a hit from COVID-19 lockdowns and executive mandates. The fact that our Governor is not taking this proposal in front of our State Legislature, is yet again, another abuse of power and completely unacceptable to the people of Minnesota.

Dan Giesen · Citizen · (Postal Code: unknown) · Jan 20, 2021 6:49 pm

👍 6 Votes

I approve of this proposal. As an out of state Minnesotan I would like to opportunity to drive an all electric vehicle for my 60 mile round trip work commute. Most of the cars available in Minnesota today either do not have a reasonable all electric mileage or are out of my price range. I believe this policy chance will allow me to have more opportunities to go electric in Minnesota while still allowing neighbors to purchase the types of vehicles that they want even if they are traditional ICE vehicles. Because I will do most of my charging at home, like most electric vehicle owners, I don't believe the current lack of charging infrastructure to be that big of a hindrance, knowing that improvements are coming.

Thank you for letting me be a part of the policy process.

Kevin Ghiloni · Citizen · (Postal Code: unknown) · Jan 21, 2021 7:09 am

👍 6 Votes

I strongly oppose this.Proposal. You need to do this the right way. You're going at this backwards IMHO. Infrastructure is not ready.and most cant afford them. More taxes will just push people further in the hole. Please stop and truly think. There's always more than one path to achieve a goal.

Val Wagner · Citizen · (Postal Code: unknown) · Jan 22, 2021 7:44 am

👍 8 Votes


I oppose the MPCA proposal to adopt the California Air Resources Board LEV and ZEV standards through the Clean Cars Minnesota initiative. I also do not agree with our current Governor and his administration taking back door methods to get unpopular agendas into law. This proposal should have been debated in our Legislative branches so the representatives we elect can be the voice of the communities they serve. I feel many

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Minnesotans are not even aware of this proposal or the economic and tax impact that could occur in their communities. Electric and Low emission vehicles may be great for California but what about rural Minnesota? Many rural Minnesotans travel farther distances to work, they may drive their kids to school and practices daily, may be traversing on county roads where 4WD or AWD is a necessity, and typically drive greater distances for services and appointments than metro area residents. The demand is gas/diesel powered pickups or SUVs in these areas because they are safe, reliable and the cost to purchase and maintain them is lower than an electric car. To purchase a comparable electric vehicle, it would be unaffordable to most. This proposal will make it more expensive for low-income households to purchase private transportation. When lithium-ion batteries are used to operate the heater and vehicle at these cold temps the reliability of the vehicle will be compromised and it will be necessary to charge frequently. The batteries will not perform well when in these conditions. Minnesotans will travel to other states to purchase autos they want at lower prices. This will not stimulate our economy which has already taken such a hit from covid lockdowns and executive mandates. Minnesota cars are already clean, this proposal will do little to improve air quality, nor will it create a demand for electric autos in our State. Minnesota would have to adopt the California policy and if California decides to change these standards in the future, they will likely only become stricter. Majority of Minnesotans do not want California dictating our lives. It will be cars now but what will next? The rules that are implemented now would have a direct impact in many greater Minnesota communities now and in the future.

Mary Efta · Citizen · (Postal Code: unknown) · Jan 24, 2021 2:06 pm

 9 Votes

I strongly oppose this rule. Adopting a rule like this will only make it more costly for low-income families to own a vehicle. These LEV and ZEV standards are likely to get more strict each year, especially if we have to follow California's rules. Minnesota then has NO flexibility. AND that is a very dangerous path to take in regards to the welfare of Minnesota citizens. We have NO IDEA how strict these California standards will be. A rule like this will increase the costs of all vehicles, thus making it harder for low-income and working-class families to earn a living. If low-income families will be harmed, who will benefit? The wealthy? Why is Minnesota not standing up for its low-income families? After MN has remained in lockdowns for the previous year, adopting a rule like this will only hurt the MN economy and MN families. According to a press release by the Walz administration, the CA car regulations would reduce annual CO2 emissions by 2 million tons a year. That may sound like a lot, BUT it's only about 1.3 percent of total state emissions of 2016, according to the MPCA's website. These reductions would reduce future global temps by 0.000052 degrees Celsius by 2100 (Orr, 2020). That's practically impossible to measure, and not a measurement that's worth stressing our MN citizens about. Lithium ion batteries also have safety concerns and a poor length of life. What's going to happen to all these batteries? How will these batteries hold up in cold weather climates? These batteries will perform poorly in a MN climate, especially for those that travel long distances in the winter. Even though these electric cars produce little emissions right in front of us, the ripple effect goes back to the electricity source. Our electricity still needs to come from somewhere, and right now the costs of electricity are increasing. So, again, this would be a very costly rule for MN adopt, and would only bring more economic harm to our citizens. I would recommend tossing this rule out completely. If dealerships in the metro area want to stock up on some EV or ZEV's that's fine. Maybe they can get a rebate or an incentive in terms of stocking electric vehicles.

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BUT, leave the rest of MN alone and DO NOT adopt this rule.

Vern Langaas · Citizen · (Postal Code: unknown) · Jan 24, 2021 2:30 pm

👍 8 Votes

I strongly oppose the proposal to adopt the California Air Resources Board LEV and ZEV standards through the Clean Cars Minnesota initiative. This could lead to a future of more restrictions and rules for MN drivers and vehicle owners. Forcing a rule like this onto dealerships is a poor approach to achieve the desired results. After a year of lockdowns, many dealerships are already on a tight budget. Dealerships stock their fleets according to what will sell. And electric vehicles will not sell well in MN. This will only raise the costs of owning a vehicle for all Minnesotans. Many dealerships are not equipped to service electric vehicles currently. If a dealership sells a vehicle, they are required to service it. Many small dealerships simply don't have the qualified technicians or servicing equipment to accommodate electric vehicles. Many people are simply looking for an affordable and reliable vehicle. That reasoning alone, rules out an electric vehicle. Many people cannot justify buying a brand new vehicle with all the expenses. And many people need something that is reliable in sub zero temps for long drives - therefore electric vehicles are not a good choice. I do not support MN adopting any policy that would force businesses to purchase something against their will. I do not support adopting any rule that would come from California, especially when it comes down to emission standards. Please abandon this rule.

Kyle Nelson · Citizen · (Postal Code: unknown) · Jan 24, 2021 2:38 pm

👍 8 Votes

I commend the MPCA for its "Statement of Need and Reasonableness", which lays out a strong, fact-based rationale for these rules and an implementation plan. It addresses many of the criticisms presented in this forum:

- No free lunch, e.g., electric vehicles (EVs) also have greenhouse gas (GHG) emissions. This is true and, yes, materials to build EVs damage the environment. Manufacturing and running internal combustion engine (ICE) vehicles do too. GHG emissions generated by EVs are, however, substantially less than an internal combustion engine (ICE) vehicle (page 21). With ICE vehicles 100% of the energy to run them is from fossil fuels. Whereas with EVs an ever-decreasing proportion of the electricity is from fossil fuels. This is illustrated in Figure 6 (page 21) and underscored by recent reports that Xcel Energy plans to "end all coal use in the upper Midwest" (https://www.xcelenergy.com/company/media_room/news_releases/xcel_energy_to_end_all_coal_use_in_the_upper_midwest), as does Minnesota Power (<https://www.startribune.com/minnesota-power-shutting-converting-final-two-coal-plants-by-2035/600009603/>). Moving towards EVs will reduce GHG emissions in the transportation sector, largest GHG contributor in the state (Figure 2, page 16).
- Not suitable for Minnesota, e.g., our weather is different. Fourteen states in addition to California and the District of Columbia have adopted California's standards, including states with weather that is similar to our own like Vermont and Maine (see Table 1, page 22). All wheel drive (AWD) EVs are available as well, e.g., Subaru Crosstrek and Mini Cooper Countryman.

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- No market for EVs, e.g., dealers will be stuck with EVs on their lot. The burden for meeting the goals is on the manufacturers, not the dealers (page 12). A credit system is proposed for manufacturers to address market imbalances (page 12-14) by enabling them to buy/sell credits. As it turns out, manufacturers have a surplus of credits banked for all states, page 23. This indicates that manufacturers are not having issues selling EVs.

- Range anxiety, e.g., the EV charging network is not as robust as the ICE fuel stations. For one type of EV, plug-in electric hybrids (PHEV), range anxiety is non-existent. These vehicles run on regular gas when the battery is discharged, re-charging the battery as you drive. For other EVs, the network of charging stations is being built out, page 45.

- Not equitable, e.g., EVs are expensive. The proposed rule does not require purchase of EVs. If EVs aren't appropriate for a person's circumstances, they need not buy one. Instead, the purpose is to improve EVs availability for purchase in Minnesota, something that is hindered today (page 48). An estimate is presented that admits that some costs are higher, but goes on to show, when amortized over the life of the EV, the benefits substantially outweigh the costs. Plus, those benefits accrue to both the car purchaser (e.g., fuel and maintenance savings, page 9) and to all Minnesotans, whether or not they have an EV (e.g., health benefits of lower pollution, page 17). From an equity perspective, a detailed analysis (page 86-90) concluded that communities that are disproportionately burdened with air pollution are anticipated to benefit most from this proposed rule, notably the Black, Indigenous, and people of color communities.

The "Statement of Need and Reasonableness" covers much more that should allay concerns. MPCA has given careful consideration for steps to implement these rules, while addressing the needs of the diverse groups of stakeholders. Given these plans and rationale, I support implementation of the Clean Cars Minnesota rules.

Response:

Deb Stevens · Citizen · (Postal Code: unknown) · Jan 31, 2021 5:44 pm

Thank you for well thought out comments. You seem to be well informed. Maybe you can answer some questions for me. Have the states that have switched to these standards seen a noticeable decrease in overall emissions in the air? What happens to the batteries when they age out? What is the impact on the environment of both creating the batteries and at end of life? What is the cost of replacing these batteries when they die? These are some of the concerns that have left me uninterested in electric cars.

Jon Grinnell · Citizen · (Postal Code: unknown) · Jan 25, 2021 10:40 am

 5 Votes

I strongly endorse OAH Docket No. 71-9003-36416.

Climate change is one of the greatest threats to humanity that exist today, and deserves our concerted efforts to minimize its impacts. Since transportation is one of the largest inputs to the greenhouse gases behind climate change, allowing Minnesota to adopt the LEV and ZEV standards is a good first step to reducing the impacts of the transportation sector. Providing Minnesotans with access to a broader range of electric and hybrid

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vehicles, and making those vehicles more affordable to purchase, is another good step. I completely support the rule-making proposed by the MPCA to update our clean car fleet and provide options for a climate-friendly transportation sector.

Mary Vrabel · Citizen · (Postal Code: unknown) · Jan 25, 2021 11:02 am

👍 6 Votes

I am in favor of the Clean Cars Minnesota proposed rule. With almost not time left to minimize the most serious effects of climate change, we must move quickly and with resolve to limit greenhouse gas emissions. Transportation is the #1 source of greenhouse gas emission in Minnesota. Pollution from tail pipes is also a significant factor in the increase of asthma and other respiratory illness among children, seniors and people of color. Zero emission cars are also cheaper to run and maintain than fossil fuel burning vehicles. I would like to have more ZEV opportunities and choices to make my next car purchase and approve of requiring car dealers to make those options available.

Nicholas Janssen · Citizen · (Postal Code: unknown) · Jan 25, 2021 11:13 am

👍 6 Votes

I would like to voice my support for adopting both parts of the Clean Cars Minnesota proposal, the Low Emission Vehicle (LEV) rules as well as the Zero Emission Vehicle (ZEV) rules. Adopting the ZEV mandate will improve consumer choice by increasing the number of electric and plug-in hybrid vehicles available to consumers in Minnesota. I would suggest adopting more stringent ZEV requirements than the proposed rule, the early-action credits and one-time credit allotment combined with a significant number of new EV models becoming available over the next few years, including many long range trucks and SUVs, will make more ambitious goals achievable.

I have owned two electric vehicles since 2014, both of which were purchased used after being shipped from California. The Clean Cars Minnesota proposal will give consumers more choice when shopping for a new vehicle, increased sales of new EVs will have the added benefit of increasing the supply of used EVs in the local market over time.

L. Stra · Citizen · (Postal Code: unknown) · Jan 25, 2021 4:51 pm

👍 9 Votes

I don't support the Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards—Clean Cars Minnesota, Minnesota Rules, chapter 7023; Revisor's ID Number 04626.

I'm strongly opposed to our government continuing to work on this topic. We are locked down due to Covid. This is not an urgent matter unlike dealing with the Covid pandemic.

Margaret Corens · Citizen · (Postal Code: unknown) · Jan 26, 2021 12:57 pm

👍 6 Votes

Please support this rule. We are going to buy an EV for our next car. As a consumer, I want more options available. I feel getting an EV would absolutely help air quality as car emissions are one of the top air pollutants. We owe it to our next generations to do the

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best we can to leave a clean air legacy.

Ken Corens · Citizen · (Postal Code: unknown) · Jan 26, 2021 1:08 pm

👍 7 Votes

I strongly support the Clean Cars Minnesota initiative. We need to reduce climate pollution and this is an area where I as an individual can make a difference. My next vehicle will be an EV.

Rod Gerads · Citizen · (Postal Code: unknown) · Jan 27, 2021 9:47 am

👍 9 Votes

I strongly oppose the new “rule”, it appears to me that this should be a law set up by our elected officials so all citizens can be aware of it, not just a select few who are aware of this website. I also question if this is a “rule” or a “law” and is there a difference? The phrase “EVs produce no pollution where they operate”, although true, is very misleading because it does not mention the CO2 produced to charge the vehicle or manufacture and disposal of the batteries which must be considered. When I see such misleading statements I have to dismiss most other statements from the source. I believe that a lot of support for this “rule” is due to this misleading statement and ask that the statement be changed to include those two factors.

Michael Lilleodden · Citizen · (Postal Code: unknown) · Jan 27, 2021 11:42 am

👍 8 Votes

I am strongly against MPCA's intention to adopt California's emission standards, bypassing the legislative process. We don't need unelected agency's making the rules!

Michael Lilleodden · Citizen · (Postal Code: unknown) · Jan 27, 2021 11:46 am

👍 8 Votes

I strongly appose MPCA's intention to adopt California's emission standards. We don't need unelected agency's bypassing the legislative process!

Dawn Van Keulen · Citizen · (Postal Code: unknown) · Jan 27, 2021 12:19 pm

👍 9 Votes

I oppose in its entirety, MPCA's intention to adopt California Emission Standards. Any significant change such as this which impacts every person in the state, should go through the legislature, not be implemented by an unelected group of people in a governmental agency in another state. We elect representatives to make decisions that will impact us so much. In addition, we should NEVER allow impactful decisions to be thrust upon us by California. What works there may not work for us in a different climate and with different economic factors.

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What works in Minneapolis/St. Paul may not work for us in the rural areas. It will take years for the infrastructure to exist all over rural Minnesota (we were promised high-speed internet access and many are still waiting, as an example). In addition, just because MN moves to all EV, what happens when you want to travel to other states? Where will you charge your vehicle if they have yet to move to EV?

We in rural MN may not have access to charging stations everywhere. This will especially be a problem during winter driving. New research from AAA reveals that when the mercury dips to 20 degrees Fahrenheit (much of the year in MN), the average driving range of an electric car decreases by 41 percent. In addition, extreme heat is also a drag on electric vehicles. When outside temperatures heat up to 95 degrees Fahrenheit and air conditioning is used, driving ranges can decrease by 17 percent. This may not matter if you're driving around the metro, but for us in rural areas, it just doesn't work! There is a cost to this. AAA's study found that the use of heat when it's 20 degrees Fahrenheit outside adds almost \$25 more for every 1,000 miles compared to the cost of combined urban and highway driving at a balmy 75 degrees Fahrenheit.

EV technology is not as "earth-friendly" as people would like to believe. Electric vehicles need batteries, and you don't make batteries out of thin air. Before the battery production process, you have to produce the components of the batteries, like the cathodes, and you have to create the compounds that go into the cathodes. Before any of that, you need to mine the raw minerals. Mining and processing of lithium are actually environmentally harmful and China dominates this market making us more dependent on them. In addition, there will be environmental consequences with recycling the batteries when they are no longer useful. Lastly, electricity also requires energy. As of 2019, 31% of the electricity used in MN comes from coal-fired power plants. You are trading one problem for another in this plan.

Without adopting the standards, the Minnesota Department of Transportation's (MnDOT's) forecast shows that gasoline usage has already hit its peak and is projected to decline exponentially in the future making this mandate unnecessary.

There is little evidence that shows that these changes will make a meaningful impact on the environment, but it will certainly destroy small auto dealers, especially in our area where we are close to border states. The effects on the rural economy are vast.

Response:

Sharon Sauer · Citizen · (Postal Code: unknown) · Feb 03, 2021 11:32 am

I agree with Dawn's comments and the research she stated. MN does not need California's car emissions standards!

Lynn Kahnke · Citizen · (Postal Code: unknown) · Jan 27, 2021 2:44 pm

👍 6 Votes

Regardless of any potential environmental impact, this rulemaking process is wrong! This needs to go through the legislature.

Colleen Hoffman · Citizen · (Postal Code: unknown) · Jan 27, 2021 3:18 pm

👍 6 Votes

Quit overregulating. Electric cars are there for those who want them. Car dealers will sell them where they can, don't force this on us. Northwest Minnesota is nothing like

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California! Let supply and demand economics run their course.

Clifford Leary · Citizen · (Postal Code: unknown) · Jan 28, 2021 10:35 am

👍 8 Votes

I oppose this in its entirety. Many of the premises upon which this is built seem more speculative and based on liberal talking points than rooted in fact. It's easy to look at Electric Vehicles as the end-all, but do do so you have to completely overlook the ecological disaster caused by their manufacture vs. the manufacturing of more traditional vehicles. This includes highly destructive mining of ore required by the batteries, often mined by child labor and subsidizing governments with horrific human rights records. You'd have to ignore the hazards of disposing of worn-out electric vehicles and their components. And you'd have to disregard the carbon produced in charging the vehicles.

The proposed rule also seemingly overstates & dramatizes the destruction of vehicles using internal combustion engines. The efficiency, performance and cleanliness of modern internal combustion engines is incredible. Additionally, those vehicles are built using processes & plants which are well established, thereby having already amortized considerable shares of any carbon produced.

This proposal will also create considerable financial burdens to the citizenry of MN, with higher vehicle purchase prices, increased taxes to pay for new infrastructure, it will reduce the choices available to new vehicle consumers, and we can all expect increased license fees, higher fuel costs & other fees imposed by the state to penalize those who elect to drive conventional vehicles, or that cannot afford to purchase newly compliant vehicles.

Passing this without engaging the Legislature seems untoward and deceptive, tied clearly to a political agenda and less to the will of the people.

If the objective is to decrease trust in MN State Government, you are very solidly on the right track.

Randy Gaffney · Citizen · (Postal Code: unknown) · Jan 28, 2021 12:06 pm

👍 8 Votes

I strongly oppose this proposed rule in its entirety!

I am not against cleaner air and a cleaner environment, but I am against an administrative rule. Minnesota residents elected congressional members to consider, debate, and decide on far-reaching ideas like this proposal. Why does our governor not want this to go through the legislature? Yes, this makes me suspect of the entire proposed rule, because I have seen how Minnesota Administrative departments try to sneak unfriendly rules and regulations into our daily lives.

If Minnesota residents demand EVs, then vehicle manufacturers will manufacture and make those vehicles available to Minnesota residents. This is a simply matter of demand driving supply.

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If metro-area residents want an EV to improve their polluted air, go buy one. But I also ask that metro-area communities are required to build solar and windmill farms in THEIR communities. NIMBY is not an excuse for metro communities to not have windmill farms and solar farms the size and scope of those in the southwestern part of Minnesota.

David Wilson · Citizen · (Postal Code: unknown) · Jan 28, 2021 12:29 pm

👍 5 Votes

we are Minnesota, not California. Any non-carbon mandates should actually work, and be self funding, and not financed by taxes, fees or utility rate hikes.

Albert Klasky · Citizen · (Postal Code: unknown) · Jan 28, 2021 12:57 pm

👍 6 Votes

I too STRONGLY oppose the very hurtful and wrong minded adoption of the "California" standard. Look no farther than CA to see the very negative impact that their laws have taken them. Many others have well stated the argument. Stop the mindless following of this unfounded thinking.

Derek Annis · Citizen · (Postal Code: unknown) · Jan 28, 2021 6:56 pm

👍 4 Votes

Please don't use California as a template to produce laws. I strongly oppose any law that would conform Minnesota laws to theirs. California is out of money & cannot fund the laws they have. The mass exodus of business & people are indicative of the effectiveness of the burdensome laws.....does Minnesota really want to go down that path? Clearly NOT

Mark Holman · Citizen · (Postal Code: unknown) · Jan 29, 2021 2:54 am

👍 2 Votes

Some interesting & very valid topics against this proposed "rule" raised here today:
https://www.crowdcast.io/e/say-no-to-california-car?utm_source=email&mc_cid=c5be84a05e&mc_eid=7c0cecbc48

Sue Christiansen · Citizen · (Postal Code: unknown) · Jan 29, 2021 5:30 pm

👍 4 Votes

I strongly support Clean Cars Minnesota, and am happy to know that it is under consideration. I have always admired California's leadership in holding the automobile industry to clean car standards. Now Minnesota has the opportunity to show the same type of leadership.

As a consumer, I carefully consider gas mileage and emissions levels before making a car purchase. I look forward to having a wide selection of top-quality, low emission or

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zero emission vehicles to choose from the next time I'm in the market for a new car.

As a Minnesotan, I value initiatives to move away from fossil fuels, which come from out of state, to locally produced clean energy. Electric vehicles are a great way to make that happen.

As a concerned citizen of this planet, I encourage every effort to reduce pollution of our air, soil, and water. Clean cars and clean energy are vital components of those efforts.

Clean cars are a vital part of Minnesota's future. Adoption of Clean Cars Minnesota is an important step forward, and we must be sure to take it.

Response:

Dawn Van Keulen · Citizen · (Postal Code: unknown) · Feb 05, 2021 9:29 am
I'm a bit confused. Did you shop for an EV and find you couldn't locate any to purchase?

Angela Carlson · Citizen · (Postal Code: unknown) · Jan 29, 2021 7:01 pm
👍 5 Votes

In preparing the SONAR, were graphs showing the air quality (e.g. concentration of CO2 and fine particles in the air) of states which have followed the Clean Car standards for 5+ years constructed? I think it would be very useful to see graphs showing the air quality of all Clean Car states over the last 20 years. For the states that I was able to find these graphs for, it appears that the overall air quality has not improved in these states.

Many of the graphs I see only examine tailpipe emissions, but this value is irrelevant if we are moving towards electric cars - the emissions have simply moved from tailpipes to power plants. In order to evaluate the effectiveness of the proposed standards, we need to see if the overall air quality of Clean Car states have improved during the years that the standards have been in place. It is also important to examine similar graphs of surrounding states that did not adopt the Clean Car standards for comparison.

If these graphs have already been constructed/compiled, can you tell me where I can find them? Or, if they have not been made, can these graphs be made and added to the SONAR?

Deb Stevens · Citizen · (Postal Code: unknown) · Jan 30, 2021 7:46 pm
👍 4 Votes

I am opposed to Clean Cars MN. Obviously, I want MN to have clean air. I mean, I have to breathe it. Unfortunately, I have misgivings about this specific plan.

I agree with others that by only looking at emissions we are not looking at the whole environmental cost. From what I've read, the batteries are created at a cost both to the environment and to human beings in other countries.

<https://www.wired.co.uk/article/lithium-batteries-environment-impact> Cleaning one part of the environment, while destroying another part is not a win. Also, as others have pointed out. It still takes energy to charge the cars. That energy is not all "zero" emission.

I might consider buying a hybrid, but I would not buy an electric car. While my

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commute is only 20 minutes on a low traffic day, during the winter or road construction season my commute has often lasted 1-2 hours. I have this horrible vision of my electric car running out of charge in the middle of a snow storm. Also, I cannot afford to have one car for going to work and one car for long road trips.

If MN is serious about adding more electric and hybrid cars to our roads, please do it through tax incentives and not through imposing California laws on us.

Grant Prushek · Citizen · (Postal Code: unknown) · Jan 30, 2021 9:35 pm

👍 6 Votes

I don't believe Minnesota is prepared with infrastructure to support Hydrogen powered vehicles, and I don't believe the extreme weather climate of Minnesota is friendly enough to allow PRACTICAL use of Electric work vehicles. The forced introduction of the proposed standards will first affect gasoline, diesel engines, and hybrids. This is where practicality, and affordability go out the window. The adverse effect on the lower income residents, and agricultural families of rural Minnesota will be devastating. Even if we were ready with powerful, dependable EV work vehicles, the rural electrical rates are 3 times urban rates. The distances traveled to work and extreme conditions will cause emission system changes resulting in test failures. You wish to adopt California Title 13 section 2040 making the vehicle owner responsible for all scheduled maintenance. ARB is required to test, but you are conveniently excluding section 2138 of the California code which makes ARB responsible for diagnosis/ restorative maintenance prior to the test. The burden falls on the consumer to pay high cost for vehicle, high cost for the preventive maintenance, and high cost for restorative maintenance to pass a test. The difficulties are compounded by the fact local repair shops will not be prepared to handle this correctly or affordably. If these emission standards are forced upon rural residents, then make the manufacturer 100% responsible for emission compliant performance for the expected vehicle life. There are three reasons Military and Tactical vehicles are exempt from these regulations. They must reliably perform in extreme conditions, the systems must be practically serviceable, and they must be affordable. Those are also the requirements for ALL vehicles in Greater Minnesota. Also, you wish to adopt California Title 13 section 2111 to include off road and all-terrain vehicles. Yet, there is an exemption in your proposed ruling about exclusive off-highway use (7023.0250 Subp.2 D). So to what exactly does this apply? Please don't lead us further down the slippery slope of non-reliable Cal Emissions off-road engines, agricultural engines, and small tool engines.

Michael Curran · Citizen · (Postal Code: unknown) · Feb 01, 2021 12:36 pm

👍 3 Votes

I would like to express my support for both the proposed Low Emission and Zero Emission vehicle standards. As noted in an article published by The Star Tribune in January 14 entitled "Minnesota falls further away from greenhouse gas reduction," our state is well behind our emission reduction goals. Because vehicle emissions are the number one source of greenhouse gas pollutants in Minnesota, implementing these standards would represent a solid commitment towards these goals. I fear that we will never reach carbon neutrality without such emissions. Quite simply, our planet doesn't have more time—we need to take these actions now.

Furthermore, as a consumer, I pledge to buy only electric vehicles in the future. Minnesotans are ready for these bold changes, but we cannot get there if we do not

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properly invest in this infrastructure. Please approve these standards.

Loren Hanson · Citizen · (Postal Code: unknown) · Feb 01, 2021 1:02 pm

👍 4 Votes

I strongly oppose the proposed clean air plan for vehicles advocated by Gov. Walz. I'm concerned this unnecessary regulation for this part of the country will result in higher costs for owning and operating a vehicle, which as a senior on a fixed income, already struggle with the affordability of owning a vehicle. And, there clearly has to be an improvement in the battery technology with electric cars since they lose their efficiency dramatically in the cold climate we live in.

Thanks for your consideration in voting no on this proposal.

Steven Langlie · Citizen · (Postal Code: unknown) · Feb 01, 2021 1:21 pm

👍 3 Votes

In what way can California with a population of 39.9 million and Minnesota with a population of approximately 5.6 million people be the same? California having 104.8 million square acres and Minnesota having 55.64 million square acres. California has 33 million Square Acres of forest and Minnesota having 42 million Square Acres of forest. This is just wrong headed to think that we should be compared and ruled by the same laws and rules made by unelected dictators. This is just wrong and i want it dropped from consideration.

Hannah Walsh · Citizen · (Postal Code: unknown) · Feb 01, 2021 1:33 pm

👍 4 Votes

I support this change. Minnesota needs to do their part to put pressure in auto manufacturers to increase their fuel economy standards and reduce emissions.

John Krenn · Citizen · (Postal Code: unknown) · Feb 01, 2021 3:40 pm

👍 4 Votes

I strongly support this rule change. We need to cut down the greenhouse gas emissions (GHGs) from transportation--now the number one contributor of GHGs in Minnesota. The lack of choice at Minnesota dealers for buyers who want clean vehicles is incredible. I have been very frustrated over the past year in trying to buy an electric vehicle or a plug-in hybrid (PHEV). There are already some great clean vehicles being manufactured--like the Honda Clarity, the Toyota Rav4 Prime, and the Hyundai Kona Electric. But none of these great cars is on the dealer lots in Minnesota. There is no opportunity for test drives, comparison shopping, etc. The salespeople tell me these vehicles cannot be purchased by Minnesota dealers because sales are limited to California and other clean car states. I do not understand why the manufacturers are doing this as they are losing profitable sales to Tesla. I would prefer to buy from a traditional manufacturer, but the lack of choice offered by Minnesota dealers may force

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me to buy a Tesla, which will mean one less sale for Minnesota dealers (adding to the many they have lost already).

Laurie Desiderato · Citizen · (Postal Code: unknown) · Feb 01, 2021 4:08 pm

👍 5 Votes

I strongly support this rule. In fact, electric cars are being shown to be not only better for the environment, but cost effective (see this MIT research comparing lifetime costs of different types of cars <https://www.carboncounter.com/#!/explore>.)

I live in northern MN and have been driving a plugin hybrid for about 4 years with no problems. I had a difficult time finding a dealer who was knowledgeable about electric cars and there were only a few options. Once people start driving these cars, they will love them! They are cheaper to operate and hardly ever need to be serviced. People fear what is unfamiliar and they tend not to do their research. I have seen many inaccuracies in the above comments. For instance, there are many comments comparing California with Minnesota, but these standards have been adopted by many other states. Also, the energy that fuels cars is much more efficiently and cleanly harvested than the gas that fuels most cars. Finally, I support this initiative because there are many hidden costs to burning fossil fuels that we will pay down the road in health bills if we do not start cleaning up our air.

Justin Anderson · Citizen · (Postal Code: unknown) · Feb 02, 2021 7:32 am

👍 4 Votes

I am very concerned about fast drastic changes to transportation here. This needs to be done in a methodology consistent with the outcomes. Rural MN is no way near capable of these drastic changes fast. We still don't have high speed internet in rural MN! Permitted infrastructure projects take over 10 years and this should be treated no different! I am very concerned with our cold temps, the need of 4 wheel drive trucks for snow removal and powered haulage, and burdened some costs related to these changes. Rural life is very different from the metro. These costs will grossly effect rural Minnesotans the most in my opinion and closed door meetings because of covid are extremely troublesome. Drastic changes need to be done in person open meeting format. Online chatting is not available for all Minnesotans and best practices are donee in person face to face with policy's that change lives!

Response:

Jane Klemz · Citizen · (Postal Code: unknown) · Feb 10, 2021 10:23 pm

Good point!!

Response:

Diana Schleisman · Citizen · (Postal Code: unknown) · Mar 14, 2021 12:32 pm

Justin, there is no fast dramatic change here. It only affects new cars. Using 2019 statistics, new car sales dwarfed to used car sales at only 29% of the entire market.

7.5% of that equates to 2.2% off aggregate sales. That is hardly an overwhelming ratio to achieve with 4 years of planning.

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Bill Adamski · Citizen · (Postal Code: unknown) · Feb 02, 2021 12:31 pm

👍 4 Votes

I am Bill Adamski from Minneapolis. I fully support Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Enacting these rules to greatly encourage electric vehicles will help push MN away from a polluting, expensive carbon-based economy. Gov Tim Walz recently announced a major goal of achieving carbon-free power in MN by 2040 in order to help stop global warming. Year 2020 was the hottest year on record. Consequently, we desperately need this rule to greatly diminish what is currently the biggest source of greenhouse gas emissions in MN: Motor vehicles.

Obviously, EV operation at this time is not totally carbon-free. That is because some (not all) of the electricity used to operate the EVs is generated from fossil fuel power plants. However, it is intended that electrical generation will eventually be from renewable sources in our lifetime.

There are other advantages of electric vehicles (EV): They are less expensive to maintain, have electric car tax credits and are quieter than gas vehicles. Continually improving battery technology and massive increases in the number of public charging stations are making it increasingly easier to drive these vehicles - and for much further distances.

A big incentive for adopting these rules is that several major motor vehicle manufacturers either already produce only electric vehicles (e.g., Tesla) or recently announced that it will be shifting from gas vehicles towards an all-electric fleet of vehicles (General Motors recently-announced goal of an all-EV fleet by 2035). Other motor vehicle manufacturers will follow GM in its future fleet configuration.

In adopting these clean car standards, originally developed by California - we would join at least 15 other states that have already done so.

Yes, let's get these rules on the State of MN books! A much cleaner, quieter MN will follow from this climate-saving action.

Sincerely,

Bill Adamski
Minneapolis

Kevin Pape · Citizen · (Postal Code: unknown) · Feb 02, 2021 7:05 pm

👍 4 Votes

I support the clean cars initiative. I live in MN and have had a difficult time replacing my current 14 yr old hybrid (Prius) with a plug-in electric car. I also currently have a plug-in electric hybrid and have found that the number of miles I get from the electric battery has NOT changed substantially from summer to winter. It's established science that climate change is great threat to my children's future well-being. It is also becoming clearer that electric vehicles, over the long-term, reduce carbon emissions and can also

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be cheaper to own and operate. Here is link to a MIT website that evaluates the cost and carbon emissions for all makes and models of vehicles. I adjusted the link to represent MN AND removed the federal tax credit. You can adjust the parameters yourself and see for yourself that electric/hybrid vehicles are among some of the lowest cost vehicles to own and operate as all well as the lowest in emissions.

[https://www.carboncounter.com/#!/explore?](https://www.carboncounter.com/#!/explore?federal_refund=dont_apply&taxfee_state=MN&price_Gasoline=2.2&price_Diesel=2.6&price_Electricity=10&electricity_ghg_fuel=600)

[federal_refund=dont_apply&taxfee_state=MN&price_Gasoline=2.2&price_Diesel=2.6&price_Electricity=10&electricity_ghg_fuel=600](https://www.carboncounter.com/#!/explore?federal_refund=dont_apply&taxfee_state=MN&price_Gasoline=2.2&price_Diesel=2.6&price_Electricity=10&electricity_ghg_fuel=600)

Michael Troutman · Citizen · (Postal Code: unknown) · Feb 02, 2021 8:11 pm

 3 Votes

I strongly support the MPCA Clean Cars Minnesota rule. I support this rule for several reasons:

- most importantly more fuel-efficient and electric cars will reduce greenhouse gas emissions in Minnesota's most polluting sector;
- the rule will clean our air and improve public health, especially in inner city urban neighborhoods that already suffer from poor air quality and air pollution;
- and our household is interested in having available a broader diversity of EV options available for purchase at Minnesota car dealers (at this point we may need to travel out of state to buy our next car).

A strong Clean Cars Minnesota rule will benefit all Minnesotans, even the car dealers who are opposing its adoption.

Cal Larson · Citizen · (Postal Code: unknown) · Feb 02, 2021 9:20 pm

 3 Votes

While this debate is part of our RIGHT and RESPONSIBILITY to find TRUTH in matters like this proposed mandate. If this is to become rules we move into the future with, it should be sent thru the legislative process with full disclosure and Minnesota's citizens should be able to fact gather over a longer period of time.

most importantly more fuel-efficient and electric cars will reduce greenhouse gas emissions in Minnesota's most polluting sector;

The above statement certainly should make all Minnesotan's feel good about moving towards the future, it does not clearly convey that a mid size vehicle (Electric) comes at a price tag of 55,000 - 60,000 pounds of carbon footprint and that's before you factor in the additional footprint during the operation of said Green vehicle. There are not and physically cannot be enough generation of electricity if only 10-15 % converts to this GREEN initiative. Before everyone gets up to protest this is simple truth. In the future with more refined processes, this may become justified in the future.

the rule will clean our air and improve public health, especially in inner city urban neighborhoods that already suffer from poor air quality and air pollution;

It may improve air quality to some degree where these vehicles are utilized, but with the carbon footprint to produce these types of vehicles, somewhere on the planet we all call

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home, will suffer from this pollution.

and our household is interested in having available a broader diversity of EV options available for purchase at Minnesota car dealers (at this point we may need to travel out of state to buy our next car).

With citizens in our state requesting electric, or other green vehicles our dealers will gain the ability to offer these types of vehicles, without a MANDATE, because it will be in their best interest to offer vehicles that consumers are requesting.

In summary the technology does not yet support these vehicles in the northern tier of our country. And consumers have and always will determine what is purchased by them, without the need for a government entity telling us what to purchase. Moving to the future with the hope of new and innovative technology, consumers WILL desire and purchase these vehicles, without a government MANDATE!

Response:

Mark Holman · Citizen · (Postal Code: unknown) · Feb 03, 2021 6:48 am

Thank you Carl for your solid insights in answering to Mr. Troutman's points above (some good analysis in there). If possible to edit your comments, could you add quotes or bullets to differentiate more clearly between HIS comments from yours? When I'd first read your post, it appeared as though his words were also yours in the body of the writing. ...and thusly looked as if you shared viewpoints in certain areas. Very respectfully & much agreed, - Mark

Don Ruzsa · Citizen · (Postal Code: unknown) · Feb 03, 2021 9:25 am

👍 4 Votes

I am against making the state like California i believe any and all big changes need to go through our legislators. I believe improving emissions should be a goal but mandating a change takes our voice away. I think what another state does shouldn't be a one size fits all. Rural Minnesota is different than the metro. Please say no to turning Minnesota into California. Thank You

Steve George · Citizen · (Postal Code: unknown) · Feb 03, 2021 12:50 pm

👍 5 Votes

Let's be clear: The MN government "mandate" in this rule is to require car dealerships to offer the same electric vehicles to Minnesota consumers that their companies currently offer to consumers in California and 12 other states. It doesn't mandate that people have to buy them. Our freedom is not being infringed upon.

I owned a Nissan Leaf EV. When I wanted to get a new all-electric small SUV with more range, i discovered that Minnesota's dealerships offered very few options. The Hyundai Kona EV looked particularly attractive but the nearest dealership that sold it was in Colorado. The nearest Kia Niro EV was in Georgia. I believe I'm not the only consumer who has chosen not to buy a new EV because of limited availability.

Several commenters have pointed out the drawbacks to all-electric vehicles. Their range

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can drop significantly during a Minnesota winter. That was certainly true of my Leaf and the primary reason I wanted to move to an EV with longer range. If I could have bought a Hyundai Kona Electric with the higher-capacity battery, I could have driven 200 miles a day in the middle of winter without recharging. I don't know about you, but I rarely drive more than 200 miles a day. In this case, I couldn't address my problem because the EVs I wanted to check out were not available in Minnesota.

As for those who argue that EVs are also bad for the environment, studies have shown that an EV drawing electricity from the dirtiest sources still generate less greenhouse emissions than a gas-powered vehicle, which means they not only contribute less to climate change but they also lessen the negative health effects of gasoline- and diesel-powered vehicles, which contribute to asthma, bronchitis, cancer, and premature death. A quick Google search of "electric car carbon footprint" will list the studies that support this.

I understand why dealerships don't want to offer EVs. The annual maintenance for my Leaf was a tire rotation. That's hundreds of dollars cheaper than the regular maintenance on a gas-powered vehicle. As the country moves from gas/diesel to electric, dealerships will lose a revenue stream. They're trying to hold that off by selling fewer EVs, which a big reason they oppose this rule.

They can't win this battle because we as consumers and as a country need to change our behaviors to stop climate change. I support this rule as an important early step on that journey.

Christine Gagne · Citizen · (Postal Code: unknown) · Feb 03, 2021 3:02 pm

 3 Votes

I am opposed to following California mandates. I am not opposed to a cleaner environment, I just believe that all the facts are not presented and people are making decisions based on fear and lack of facts and maybe even some untruths. I want to know how is China going to be enhanced by this decision to spend MN earned dollars in China for these upgraded cars and or other equipment? China I'm told, (because we have no way of filtering out the truth from the half truths the smoke and mirrors) is the biggest threat to clean air in the world. CA is being polluted not only by the cars driven by the huge population there, but by the air coming from China and the lack of regulation in China. I suspect that the air pollution will continue to be pushed into our state eventually from China, to the West Coast to Central US etc. I want to know who is going to make out big with the Green New deal as well as this new environmental issue? Are we going to send the manufacturing of these new ideas to China where the manufacturing is not regulated like in the USA? Is it true that China is not regulating manufacturers from polluting their water ways their air ways? What kind of sense is that? While we are spending our money to clean our air, we are giving money to China to make the air worse? When we allow China to get away with it our small population's effort is minimized and at great expense to the working class which of many are losing their jobs, livelyhoods and ability to feed their families, much less contribute to the huge expense of regulation.

Another reason we cannot utilize the same rules as CA is the weather. Being stranded in Mpls without power to drive your vehicle is maybe not life threatening but could really be in most of the other parts of MN. Who wants to be the one responsible for the death of a car full of teenagers out just trying to enjoy life a little. Or an elderly couple just trying to get home from a visit to the nursing home. Sorry this needs to be thought through a lot

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more. And don't forget the amount of jobs that are going to be lost and the tax burden left to the ones left with jobs. Another thought is land fill. What about the huge amounts of landfill now needed for unusable cars, battery replacement for the new cars every year to 2 years and of course the huge wind mill blades that are broken regularly and now filling up the land fills faster than plastic. How about a simple completely free to American taxpayers solution? At least until a better solution can be found. Why don't we just outlaw private jets? Is it because we are afraid of annoying the rich who spend their time joy riding around the biggest emission vehicles? Or why are we encouraging businesses by tax breaks to buy vehicles that are over 6000 pounds? May-be we could even limit the amount of air travel altogether. If the environment crisis is truly truly real, than why is is the whole burden of the little guy???? Why can congressmen fly back and forth to Washington DC on a regular basis when remote meetings are so readily available? Why not address that more and more people can just use their vehicles less by working from home???? Simple easy and completely free solutions to start with. We need to utilize our own thinking and not try to just copy a state that is nothing like our state.

Robyn Severson · Citizen · (Postal Code: unknown) · Feb 03, 2021 4:29 pm

👍 3 Votes

I support this initiative. Electric vehicles need to be available and accessible. They are proven to be better for the environment and safer for the occupants if involved in a collision. Please listen to the Minnesotans that are commenting on here and know they represent a larger constituency

Response:

Patrick Wolf · Citizen · (Postal Code: unknown) · Feb 05, 2021 10:27 am

Please site your sources that support your statement "... safer for the occupants if involved in a collision". Without the protection of a traditional engine block and the rigidity required to support a standard drivetrain, EVs with the same safety equipment of a standard vehicles are not any safer . Although there isn't any combustible fuel in EVs, their batteries create an entirely different risk, one that many first responders are not equipped to properly mitigate.

Have you ever seen the devastation caused by a lithium battery? I have and the extreme heat and resistance to standard fire suppression methods make them very dangerous. They burn so hot they will melt through the EV and 6" into the road surface below.

Margaret Dexheimer Pharris · Citizen · (Postal Code: unknown) · Feb 04, 2021 10:42 am

👍 4 Votes

As a nurse I strongly support approval of the proposed Revision to Minnesota Rules, chapter 7023, Adapting Vehicle Greenhouse Gas Emissions Standards, particularly with early action only credits. Time is of the essence. As the MNPCA's Statement of Need and Reasonableness (SONAR) points out, Minnesota is falling significantly behind on our goals for reducing greenhouse gases.

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Vehicle greenhouse gas emissions and associated chemical pollutants are dangerous to the health of the people of Minnesota. I write with particular concern for people in my North Minneapolis community where asthma hospitalizations are Minnesota's highest (MDH & MPCA Life and Breath Reports). Our community is bounded by Highways 94, 394, and 100 and crossed by Highway 55—all four are heavy traffic transit routes in and out of downtown Minneapolis. While vehicle emissions impact the health of all Minnesotans, they have a harsher effect in vulnerable communities (see SONAR pp. 83-91 for equity analyses data). To protect the health of the public and of the planet, we need to take swift action to make more zero emissions vehicles available and affordable.

Zero emissions vehicles are not readily available in MN. About three years ago, our family came to grips with our role in the planetary threat posed by greenhouse gases and the health effects of gasoline powered vehicle emissions; we stopped regular use of our gasoline powered car and moved instead to biking and walking—taking public transit when necessary. When the pandemic hit, we began looking to trade our automobile in for a zero-emissions vehicle (ZEV) so that we could safely and conscientiously travel when necessary. We came to the realization that a low emission vehicle was not sufficient to meet MN's goals or the mandate to safeguard local and global community health. We did not have the budget for a new ZEV and we could not find an appropriate used ZEV on the market. We asked Poquet Auto sales staff to keep a lookout for a used ZEV. Eventually, they found a couple who were both working from home and looking to sell one of their vehicles. Poquet procured their 2019 Nissan Leaf, which we were lucky enough to buy, trading in our gas-powered car for this wonderful electronic vehicle. It is a smoother and more reliable ride; we love this car. Two to three times a week we plug it in for three hours during the night, using Xcel Energy's wind generated power. In parking lots and on the street, many people approach us and ask us about our car, stating that they have been looking for a ZEV, but cannot find one. The more quickly we get ZEVs on lots, the sooner more affordable ZEVs will be available, our air will be cleaner, and our communities healthier. Thank you for the important role you are playing in the transition to clean cars in Minnesota!

Please approve the proposed revision to MN Rules chapter 7023 with early action only credits.

Margaret Dexheimer Pharris, PhD, RN, MPH, FAAN

Response:

Carrie Schroeder · Citizen · (Postal Code: unknown) · Mar 14, 2021 11:20 pm
People in rural Minnesota do not have access to public transportation. What works in the metro does NOT work in places like Caledonia or Bemidji.

James Bachleda · Citizen · (Postal Code: unknown) · Feb 04, 2021 12:04 pm

👍 2 Votes

I do not support this plan, copy and pasting a larger states emissions standards are not the solution, I recommend shaping an emissions bill that's more suitable for our population and needs.

Scott Cannon · Citizen · (Postal Code: unknown) · Feb 04, 2021 12:38 pm

👍 2 Votes

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Do not support this plan. It will burden costs on MN citizens that are not needed. California and Minnesota by no means have a similar climate. Ev's are not made for our climate. There is no reason to copy anything from the failing state of California. Us rural residents would not be able to afford the costs of vehicles that are required. not with this idea at all terrible idea do not adopt.

Scott Miller · Citizen · (Postal Code: unknown) · Feb 04, 2021 1:09 pm

👍 4 Votes

As a free American, I believe in our free market economy and allowing people to 'vote' with their dollars. If EV's are wanted, buy them but we do not need government to dictate what we can or cannot have. I am formally against this.

TIFFANY TOSCANO · Citizen · (Postal Code: unknown) · Feb 04, 2021 3:45 pm

👍 4 Votes

I have worked in the automotive industry for 7 years in the state of MN and I OPPOSE this plan.

From my experience and opinion, these standards are NOT feasible to force into law.

Many California-Emissions cars are incredibly expensive to maintain and purchase compared to what is available for purchase today. Adopting this as a new law WILL expand the already, massive gap between lower class and upper class. If the Clean Cars MN law is adopted, the choice of owning the proper private Transportation will no longer be an achievable privilege for most of us citizens as the cost to maintain an EV is incredibly expensive in comparison to a regular fuel or hybrid vehicle. The reliance on electronics is mostly to blame for the increase in costs; another factor is the inflation of labor costs to repair-- once shops spend thousands on new training and equipment, goodbye to the Mom and Pop \$60/hr shop. Therefore, choosing to vote in favor of adopting this law will unfairly and unnecessarily make private transportation a LUXURY 'option' for Minnesotans in the coming decades; many of whom are recovering from job loss, economic downturns due to Covid-19, and infrastructure changes due to the new Administration.

I highly recommend our legislature reconsider the clean car proposal -- We do not have the same Climate as C.A. and our terrain requires more options than what this law will allow. Many comments here in favor of EV are referencing the Metro area or other smaller metros. In the metro area, they have the luxury/are able to drive shorter distances between work and home and almost always guaranteed to drive on heavily maintained city and state highways/freeways for their commute. The majority of the state is considered rugged terrain with dirt roads, back roads, rugged mining towns or farm-land (where the majority of MN resides) and this type of travel is absolutely NOT suitable for a little electric powered vehicle. Many residents outside of the very few metros of the state have a 30-plus mile commute for something as simple as groceries or doctors appointments. Introducing CC-MN as a 'mandated law' would require an extreme abundance of charging stations or alternate fuel stations to be installed across thousands of acres of state owned land (where majority of highways reside)-- and at what expense to the state?

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Considering Gov. Walz has flaunted over \$3 million in raised funds (potentially) for reelection AND he is asking to raise taxes higher to rebuild a city he and Frey allowed to be destroyed is an insult to ALL of us residents. Discussing Clean Cars at this moment in time looks unwise and at the very least smug to the hard working citizens across Minnesota. Do you want us to farm, work, and raise our families in your state? Clearly, we have more daunting tasks to discuss at legislature aside from imposing new, suffocating laws on our transportation options as MN state citizens..

If a change must happen, a considerable alternative would be safety checks of vehicle safety equipment (D.O.T.style) every 2 years or between sales to ensure these vehicles are SAFE on the roads. NOT an Emissions standards increase.
Another option would be to encourage EV's available for purchase in highly populated, structurally sound CITIES for those with the luxury of living in the concrete jungle. Just for comparison, fewer than 20% of Minnesota roads are in urban areas which leaves 80% of roads across the state incomparable to urban area roads or opinions. 80% are categorized as as low maintenance, rural, unpaved, rarely traveled, or "off the grid". Again, I restate: "Introducing CC-MN as a mandated law would require an extreme abundance of charging stations or alternate fuel stations to be installed across Minnesota -- and at what expense to the state?"

Source: <https://www.dot.state.mn.us/roadway/data/fun-facts.html>

As an experienced automotive shop employee, I believe emissions equipment- OEM required are engineered poorly and the electronics involved are known to fail quite frequently; especially in sub-zero temps. Consumers/drivers are already wasting hundreds of dollars to fix a faulty sensor that has nothing to do with the safety and integrity of the vehicle- just to keep a vehicle from spitting out micrograms of particles.

The amount of emissions technology that is scrapped to landfills from failing parts is just as detrimental to our environment's health as excessive carbon emissions. Also, electrical vehicles use electricity which is currently majority-provided by coal with smaller alternatives to wind or solar power. Increasing wind and solar are available at a steep cost.

If we convert to majority of Wind energy, consider that a Wind generator uses anywhere from 10 gallons of oil for smaller machines to over 400 gallons of OIL for a large-scale turbine. Site sourced for reference. On the contrary, many internal components of solar panels are non-recyclable and extremely toxic to the environment and health of those near the landfills once they reach end of life. Site sourced for reference.

Without better alternatives to fuel our electrical sources, introducing EV vehicles are nothing more than a "feel good" attempt for a proud human to gloat. Forcing the EV clean law on all Minnesotans is the WRONG choice across the board. EV mandates will surely damage more than the air we breathe.

<https://www.power-eng.com/renewables/wind/keeping-wind-turbines-spinning/#gref>
<https://www.solarpowerworldonline.com/2018/04/its-time-to-plan-for-solar-panel-recycling-in-the-united-states/>

At the very least, reconsider this with mercy for the residents of this state who are now living paycheck to paycheck AND for the thousands of auto mechanic shops that will not have the finances/aid to convert from standard emissions equipment to extremely expensive equipment. A shop would incur astronomical costs from expensive training, new machines, certifications, and purchasing new computer technology required to

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repair EV vehicles.--

Business owners and residents alike are already anticipating the potential for higher taxes at your hands; from Walz's new proposals and Federal proposals.

As a Minnesota resident, take mercy on us and consider the bad will outweigh the good for a majority of your State's residents. I encourage the legislature to take the conversation for clean cars elsewhere.. This is not the right time nor right state to consider a roll-out mandate for EV.

Thank you for your time.

Eve Wallinga · Citizen · (Postal Code: unknown) · Feb 04, 2021 4:14 pm

 4 Votes

I strongly support this Clean Cars initiative, especially given Minnesota's failure, so far, to meet greenhouse gas emission targets. As others have pointed out, providing more charging stations will help increase demand for EVs, but having these cars available for consumers to see and test drive on dealers' car lots will also increase demand. My husband and I purchased an EV last year. There were none available for us to see at any dealers closer than an hour away. We were very fortunate to find a young car salesman who was a knowledgeable and enthusiastic EV owner himself. Dealers who have chosen not to carry these vehicles, even whose cars are supplied by car makers who manufacture EVs, we found to be of no help whatsoever in our shopping. Minnesota is not normally a backward state, but in this arena, it felt as though it was. Minnesotans deserve to have the full array of car choices available to us and which many other states enjoy. The Clean Cars Initiative will help move Minnesotans into the 21st century of technology and social responsibility. These cars, in addition to lowering carbon emissions (even when the electricity is still being supplied by fossil fuels), are often very reasonably priced, with lower fuel costs and much less maintenance costs (which may be one reason some car dealers are not enthusiastic about providing this choice for consumers), making them an attractive choice for lower and middle class consumers. As more car manufacturers commit to phase out fossil fueled vehicles, no doubt they will back up their commitments with greater advertising and promotion of these automobiles, which will create a win-win for car dealers.

Daniel Anderson · Citizen · (Postal Code: unknown) · Feb 05, 2021 1:49 am

 3 Votes

No. As a lifelong resident of Minnesota I oppose the Minnesota pollution control agencies Minnesota clean cars act 36416. This is legislation that does not need to apply to Minnesotans. We should publish our own thoughts, not from some other state or organization. Our mostly rural state does not need this type of legislation. The citizens do not want it. Do not pass the Minnesota clean cars act. Electric vehicles are available for anyone who wants them already. Do not pass Minnesota clean cars act. Thank you.

Patrick Wolf · Citizen · (Postal Code: unknown) · Feb 05, 2021 10:10 am

 3 Votes

I am strongly opposed to these proposed rule changes. This attempt at a "one size for

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all" and unilaterally adopting the unproven standards from state we share almost nothing in common with is not practical. There is a large part of Minnesota outside of the metropolitan area where EVs are not practical. Large families cannot afford to buy two EVs to replace the singular large vehicle to meet their needs. EVs are not practical to haul commercial or even recreational equipment any distance. The major automobile manufacturers have already committed to meet the needs of their customers and make more EVs; legislators and especially State Agencies have no business interfering with what is already happening organically through competitive business. If cities or counties want to adopt requirements or additional fees, that should be up to their locally elected officials. Minnesota does not need any more draconian rules that burden all of us to make a few feel good about themselves.

For all of those that are saying "I can't find any EVs" you are not looking. I purchased two during this pandemic, all online, and delivered to my front door. If an EV is practical for you, then buy one! Just because it works for you and you can afford to, don't expect that others can.

Aaron Plafcan · Citizen · (Postal Code: unknown) · Feb 05, 2021 11:02 am

 4 Votes

I would like to offer a unique opinion on this topic as I seen most people that have commented on here seem to speak about issues with dealers inventory and demand etc. I do work for a Chevrolet dealership and I am one of the Bolt salesman. One thing I have noticed in these comments is the assumption of demand for more EV's at least in my area we certainly have seen an increase in interest from people regarding the bolt and are one of the top sellers of them in Minnesota. On that note however there is a fallacy thinking of the high demand, the demand for customers coming in asking for trucks is higher than ever and I do respect many of your opinion's for a high EV demand level but compared to the truck market it's very insignificant. We simply live in a truck society here in Minnesota weather it's in the cities or certainly greater Minnesota, it's simply true. I feel the response I would receive is that if inventories being the same more people would choose EV's, I certainly don't have a crystal ball to make that guess. Simply put what is good for the goose isn't always good for the gander. EV's are great vehicles and I do enjoy them but they are simply another option not a replacement. Some of you on here speak about dealerships not wanting to stock EV's or not having inventory. It is partly on the dealership and mostly on the manufacturer. The manufacturer sends most of the EV inventory to big EV areas such as LA, Atlanta, Washington, Oregon etc. The cost that dealers incur from the manufacturer to make sure you have proper equipment, sales staff that's trained, Service technicians trained to work on them is about 25,000-50,000 depending on the requirements. That's a lot of investment that dealerships need to take a hard look at to see if they will get a return on. Right now dealerships aren't seeing a good return on that, will it change in the future? Some dealerships don't get anyone that comes in and asks about an EV. In regards to green houses gasses and climate change, I certainly am not a Scientist, and I don't study these topics, my only question is how can we take around 100 years of recorded data on "climate change" as irrefutable when earth has been in existence for and estimated 4 billion years? That's not a large sample size to go off of to make these types of big decisions on even though I certainly understand it's all they can go off of. Again I do enjoy EV's as well as Gas engine vehicle's, and if my opinion counts in some capacity I'm not in favor of the proposed legislation to adopt the new standards.

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Darren Durst · Citizen · (Postal Code: unknown) · Feb 05, 2021 11:59 am

👍 3 Votes

Regarding OAH Docket No. 71-9003-36416,

I am writing in opposition to this rule. Minnesota should not be abdicating its decisions regarding its environmental policies to any other state, let alone to a state with a vastly superior population density, different climate, and vehicle demands. These are decisions that must be made by Minnesotans through their elected officials. Unelected bureaucrats in California could decide to ban gas powered lawnmowers or gas grills and Minnesotans would have no say in the matter.

What is good and necessary for California, is not necessarily good and necessary for Minnesota. California had dozens of areas identified as having poor air quality, Minnesota has zero. The best-selling vehicle for the first quarter of 2020 in California is the Tesla Model 3; in Minnesota it the Chevrolet Silverado 1500. The vehicle needs of the people between the two states are entirely different.

I work at an automobile dealership in southern Minnesota. We sometimes do not have the specific inventory that the consumer wants. That means that we need to trade with another dealer to get that specific vehicle. We frequently need to trade across state lines. If this rule were to be adopted, we would only be able trade with Minnesota or California dealers. This means, in the immediate future, a lost sale for us and less choice for the consumer.

But the lack of choice doesn't end there. California has required, under their environmental regulation, all vehicle sold by 2035 must be electric vehicles. If this rule were to be adopted, the same requirements would hold for Minnesotans. They couldn't buy a new gasoline powered vehicle if they wanted to. Manufacturers will not retool their facilities to produce all electric vehicles just because 2 states have adopted EV only sales. That means that their will likely be a shortfall of inventory to be able to keep up with new vehicle demand and drive sales to gasoline powered vehicles. If Minnesotans wish for or have need of a gasoline powered vehicle, they would have to purchase a pre-owned vehicle which would only increase the demand for pre-owned vehicles because not everyone can afford a new vehicle. As demand rises, the cost of these pre-owned vehicles will also rise thereby increase the financial burden on those who already struggle to find the funds to purchase a vehicle.

Minnesota farmers are have been struggling for many years. The number of new markets for their products has been dwindling. The ethanol and bio-diesel market has breathed new life in the farming community. Adaptation 71-9003-36416 would not only ad financial burden to the farmers by forcing higher repair cost on aging assets, but would also hit the ethanol and biodiesel markets hard. This damage wouldn't just be felt by the farmers. Every rural town and community that depends on the success of the farmer would feel the pain. If the farmers don't have the income to spend in their local communities, many jobs would be lost.

Please consider the overwhelming negative consequences of adopting this rule and reject it. Leave the rule making on how best care for the Environment of Minnesota to the people of Minnesota through their elected officials.

Thank you,
Darren Durst

Gordon Weber · Citizen · (Postal Code: unknown) · Feb 06, 2021 12:35 pm

👍 2 Votes

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The MPCA should adopt the Clean Cars Minnesota rule, as proposed. It is a modest step in addressing the massive problem of greenhouse gasses and global warming. Do not be distracted by those making bad-faith process arguments that the rule should be taken up by the legislature. They are simply carrying water (perhaps unwittingly) for those who see the rule as potentially adversely impacting their short-term economic interests. The rule clearly is within the MPCA's current mandate to regulate pollution generally and greenhouse gasses specifically.

I am the happy owner of a Honda Clarity plug-in hybrid car. It now is only offered in California. If the MPCA adopts the Clean Cars Minnesota rule, maybe Minnesotans will once again have access to this car without having to special order it - and gain access to a wide range of electric vehicles in development.

We are way behind in fighting climate change and transitioning away from fossil fuels. This common sense, modest rule shouldn't be derailed by those carping about state sovereignty and delegation of legislative authority.

Thanks for the work of the MPCA. I wish them well in their continuing efforts to improve the lives of all Minnesotans.

Cheryl Ferguson · Citizen · (Postal Code: unknown) · Feb 06, 2021 1:14 pm

👍 3 Votes

Strongly oppose this and the lack of legislative involvement!

Response:

Jane Klemz · Citizen · (Postal Code: unknown) · Feb 10, 2021 10:09 pm

agreed

Kyle Travis · Citizen · (Postal Code: unknown) · Feb 06, 2021 3:54 pm

👍 3 Votes

I support Clean Cars Minnesota. Minnesota has emission goals and we have fallen behind on it. This idea provides more clean car options to people who want clean cars, it doesn't require people to give up their current vehicles. The electric energy that would power these vehicles may come from power plants that use coal to generate that electricity, but we have to take this one step at a time. We need to cut out sources of greenhouse emissions so we can focus on the next thing. The longer that we wait for that one idea that will fix everything, the more consequential things will become, not to mention that there won't be one idea that fixes everything. As people above have mentioned, Minnesota is not California. However this step could lead us in the right direction.

David Vorland · Citizen · (Postal Code: unknown) · Feb 06, 2021 4:41 pm

👍 3 Votes

I fully support the MPCA action to make Clean Car Minnesota rules. Minnesota's air quality and the natural world we desire are endangered by the continued use of vehicles

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that have unhealthy emissions. We must offer easy access and availability to encourage higher use of reduced or zero emission vehicles. Changing the direction away from gas powered cars will take time so change must start now to meet or exceed Minnesota 2050 emission goals. My partner is seeking an electric vehicle now and has few options to test and purchase locally.

Anne Reich · Citizen · (Postal Code: unknown) · Feb 07, 2021 10:09 am

👍 2 Votes

I support the Clean Cars Minnesota Rule. Energy efficient and electric vehicles help reduce air pollution, including climate altering carbon emissions. Action is URGENT - there is no time to waste on addressing climate change. LEVs and ZEVs cost less to fuel, saving Minnesotans like our family \$\$\$. We drive a Chevy Bolt, and love it. It doesn't pollute the air — we purchase renewable, Minnesota-made (JOBS! JOBS!) clean electricity. Many EVs are cheaper than most gas vehicles in the long run, due to lower fuel and maintenance costs. We were frustrated that when we went car shopping, we found our choice of EVs severely limited in Minnesota. Since we are not (yet) a Clean Car state, EV car makers don't sell many desirable models (like SUVs) here. By becoming a Clean Car state, our state won't be left behind - keep Minnesota on the map! Please promote freedom of choice, affordability, renewable energy jobs, and CLEAN AIR by supporting Clean Cars Minnesota - this is a win-win-win-win for Minnesotans, our state and our country!

Katherine Schafer · Citizen · (Postal Code: unknown) · Feb 07, 2021 3:53 pm

👍 2 Votes

I believe Minnesota and the MPCA should support a Clean Cars standard. Clean Cars Minnesota will usher in improved vehicle emissions standards that will help clean our air, improve our health, and save money for the people in Minnesota. The last air quality tests indicated that, not only have we not improved, but our air quality is worse. Cleaner air means less money is spent on medical costs to address the health conditions of asthma and COPD. EV and low EV cars cost less to operate and maintain. We need to lower emissions and thus lower greenhouse gases. We are at 1% increase in warming now and on our way to 2%. The effects of climate change are horrendous: ocean acidification, habitat loss-, droughts, floods, hurricanes, tornadoes, increases in wildfires. All of these effects will create food insecurity, major health problems and mass migrations. All of these issues will be very costly. The United States military has declared climate change to be a national security threat. Climate change will especially impact the poor and people of color. The wealthy will be able to more insulate themselves from these ramifications, just as they have been able to do during this virus. We can not wait on our MN legislature to pass these clean car standards. The senate is working to block the standards, if they pass, using SF 450. If these standards do pass they still do not take effect until 2024 which means three more years lost. The MPCA needs to pass the Clean Car Initiative and then the people of Minnesota need to stand up to our politicians and demand that the standards stay. The health of our planet and the economic well-being of the citizens of the United States demands nothing less.

Alena McNamara · Citizen · (Postal Code: unknown) · Feb 07, 2021 5:15 pm

👍 3 Votes

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I support the Clean Cars Minnesota proposal! Having emission limitations on new cars overall is obviously the correct choice given climate change. We are behind in not having adopted these standards already.

Also, availability of ZEVs is also key to moving our society toward a carbon-neutral future. I recently moved to Minnesota from Massachusetts, a state that has also adopted these regulations. When I next need to replace my car, I would love to be able to purchase an electric vehicle--and without regulations that mandate availability, it seems unlikely that I will be able to. Large car manufacturers are already operating under these requirements in other states, it isn't going to be a trial to them to comply here as well, and the requirements don't mean anybody HAS to buy a zero-emissions vehicle. It only says Minnesotans ought to have the option and I don't think anybody could disagree with that.

Ryan Schmotter · Citizen · (Postal Code: unknown) · Feb 07, 2021 10:22 pm

👍 2 Votes

There is obviously a lack of demand for EV's, or car manufacturers and dealers would have them available, as I think they are still in the business to make money. This bill would manipulate supply in order to create demand. If they are indeed practical for MN, and we the people decide(per the Constitution) we value our environment, believe internal combustion cars are to blame for its ills, and this is the best way to fix it, how about we first concentrate on the infrastructure and a power source that is both cheap, viable and has the least footprint like nuclear? This bill does none of that. Also, let's use a little critical thinking - how well are things working out for California in just about every empirical metric?

Isaac Orr · Citizen · (Postal Code: unknown) · Feb 08, 2021 2:40 pm

👍 1 Votes

Hello and good afternoon,

I was looking through the technical analysis, and I would like MPCA to provide me with some of the data used in the analysis, preferably in an Excel spreadsheet.

I would appreciate the estimated real-world per-mile fuel savings benefit (in gallons) for both passenger cars and light-duty trucks for model years 2025-2034 based on the differences between the LEV standards and the SAFE rule.

I would also be appreciative if MPCA would provide the exact figures used in EPA's MOVES model for LEV and ZEV vehicles in each model year. I'd also like the data described here:

"Finally, we calculated dollar savings per vehicle using the calculated fuel savings and projected gasoline prices from the U.S. Energy Information Association's 2019 Annual Energy Outlook from the Reference case in its Table 12: Petroleum and Other Liquids Prices. 51 These gasoline price projections are \$3.07/gallon (in 2018 dollars) in 2023 and grow at an average rate of 0.7% per year in subsequent years. The EIA, in fact, predicts that the price per gallon of gasoline will increase from now through 2050 under all scenarios (Figure 14)"

Also, there seems to be an inconsistency in the Annual Energy Outlook scenarios used. Some tables, like Table 19, use AOE from 2016, while the paragraph above uses the 2019 AEO. Is there a reason MPCA did not use the 2020 AEO instead of the 2019 version? These documents are released in January, so the agency would have had ample time to adjust the numbers.

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I was told by a representative at MPCA that I may be able to get answers to this before March 15th, the deadline for the first round of comments. I hope the ALJ will require the agency to make this information public much faster than that, preferably by the end of the week. I would assume these documents would need to be saved as part of the rulemaking process.

Given the scope of the rule, I guess I'm a little surprised that the spreadsheets were not offered as an appendix to the technical support document to make evaluations of the rules as transparent as possible.

Hopefully, these questions can be answered and data provided in a timely fashion to ensure a transparent process and instill confidence in the rulemaking.

Isaac Orr Policy Fellow Energy and Environmental Policy Center of the American Experiment

Lydia Murphy · Citizen · (Postal Code: unknown) · Feb 08, 2021 4:55 pm

👍 3 Votes

I support the Clean Cars Minnesota proposal. It is time for progress in regards to separating our society from the use of fossil fuels. Adopting the Clean Cars Rule would be a contribution to this progress. LEV's and ZEV's are not currently in high demand because they are unaffordable. It's difficult for someone to make the choice to purchase an LEV or ZEV if there is no way to afford one. This rule would allow for more folks to access these vehicles. It's time to be done with supporting fossil fuel infrastructure, and time to be bold and adopt this rule for the future of our planet.

Kathryn Jones · Citizen · (Postal Code: unknown) · Feb 08, 2021 6:26 pm

👍 3 Votes

I strongly support the Clean Cars Minnesota proposal, Possible Amendments to Rules Governing Passenger Vehicle Greenhouse Gas Emissions (Clean Cars Minnesota), Minnesota Rules, Chapter 7023. We would be hurting all of us by being blind to climate change and its effect on our health and our planet.

GM has announced that it will exclusively offer electric vehicles by 2035 and end production of cars, trucks and SUVs with gasoline or diesel powered engines. This is the future. We can wait to be one of the last states to facilitate this reality with a Clean Cars rule, keeping it difficult for people who want an electric vehicle to find one in Minnesota, OR we can join the more than a dozen other forward thinking states to adopt this common sense rule. Thank you Minnesota for putting this forward. I strongly support the Clean Cars Minnesota proposal.

Russell Jackson · Citizen · (Postal Code: unknown) · Feb 09, 2021 9:32 am

👍 3 Votes

I do not think this proposal is a good idea. The present cost of an electric car is presently way to high for most people. I will be going to another state to buy my car if this proposal is put in place. Let's keep on going with this clean air proposal. Maybe the people that want this act should:

1.) Get rid of their cell phones

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- 2.) Get rid of their computers
 - 3.) Use a wood burning stove to cook with
 - 4.) Cut wood for their natural gas furnace
 - 5.) Get rid of all street lights
 - 6.) Walk to work/Take a bike. It was -20 below at my house this morning.
 - 7.) Do not order stuff on Amazon. How do you think the products get to your house?
 - 8.) Have your mail delivered by horse
 - 9.) Make room for all of the solar panels your are going to need by clearing the forests.
 - 10.) I suppose you think the "clean air" that will be created will stay within the state's borders.
 - 11.) What about the neighboring states. Will their "dirty air" stop at the state's border?
 - 12.) Move to CA.
 - 13.) Light your house with candles.

I realize that my above statements appear draconian, but that is where we are headed. It starts out maybe harmless, but it keeps going.

Roger Zastrow · Citizen · (Postal Code: unknown) · Feb 09, 2021 2:30 pm

 3 Votes

I am not in favor of this rule because it ties us to another state that has very different needs than Minnesota. Any time they change the rule to fit California it would tie Minnesota to that rule change. I do not hear of them getting to 25 below 0 this week or ever, that greatly affects battery life. The same people that want this rule also do not want mining how do you get the materials to make the battery's? How do you dispose of the battery's when they ware out. These are questions that have to be answered. I am not against electric cars. I do think they have a place and technology will change to make them very useable but allowing another state a 1000 miles from us to make laws for us with no representation is not a good idea. I also think the federal laws will be changing soon that will require some of these changes. I would like to see the option of more electric cars at dealers and I think markets will be driving that very soon. (think GM) Maybe the state lawmakers should do that but not California.

GARY WALLINGA · Citizen · (Postal Code: unknown) · Feb 09, 2021 5:34 pm

 3 Votes

SUPPORT FOR THE CLEAN CARS FOR MINNESOTA INITIATIVE

Transportation is the largest emitter of greenhouse gases (GHGs), and thus a significant contributor to climate change, both nationally and in Minnesota, Our Minnesota winters are warming 13 times faster than our summers, and extreme weather is becoming more frequent, which is threatening the health and wellbeing of all Minnesotans. Northern Minnesota is particularly at risk. It has warmed almost twice as much as the national average. If we take no action, Minnesota is on track to lose our Northern boreal forests by 2070. We will look like Kansas.

The Minnesota Department of Transportation (MnDOT) Pathways to Decarbonization report published in 2019, laid out multiple initiatives needed to bring transportation GHG emissions in line with the state's goal of an 80% reduction in such emissions, from 2005 levels, by 2050. These goals were set out by the Next Generation Energy Act of 2007 and signed into law by Governor Pawlenty. Adopting clean car standards is a significant

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tool for reducing GHG emissions from passenger vehicles, which comprise almost 60% of all such emissions from the transportation sector.

Climate impacts are not the only reason clean car standards are urgently needed. Human health is also at stake. Air pollution in the form of fine particulate matter and ground-level ozone harms lungs and hearts especially when breathed in regularly, which is a burden that falls disproportionately on low-income communities and those of color. Rural communities are also at risk. A recent study by the MPCA found death rates attributable to air pollution were higher in rural areas than urban. Transportation is a major contributor of such air pollution and adopting clean car standards is a step in the right direction toward a healthier state. As an employee of CentraCare Health Systems, in Central Minnesota, I have witnessed increases in pediatric asthma related to poorer air quality. There have also been increases in vector borne diseases such as Lyme Disease, attributable to our warming climate caused by GHGs.

Further, without clean car standards, consumer choice is limited. Folks who are interested in buying or leasing an electric vehicle cannot find all available makes and models in Minnesota. In fact, such prospective vehicle customers may not find even one electric vehicle on a dealer lot. This is partly because automakers choose to not deliver their electric vehicles to states without clean car standards. States that do adopt the standards, however, have more electric options. Clean Cars Minnesota will give consumers the options they want so they can decide what's best for them. Personally, I have experienced this problem with availability. When looking for an electric vehicle in St. Cloud, I had to travel to Annandale to find a dealer with the car I wanted.

While Clean Cars Minnesota will do a lot for Minnesotans in the way of climate, health, and choice, there are a few key things it will not do:

- Clean Cars Minnesota will not impact farming equipment. Clean Cars Minnesota only affects new passenger cars and light-duty trucks for sale. It does not apply to heavy-duty vehicles like farming equipment or big rigs.

- Clean Cars Minnesota will not stop you from buying a gasoline car nor make you buy an electric vehicle (EV) but it will give you more choice. Clean Cars Minnesota does not require anyone to buy an EV - in fact, under its most stringent form, only about 8% of new vehicle sales in Minnesota would be electric. However, the standards will increase the availability of different makes and models on sales lots in Minnesota. In fact, adopting Clean Cars Minnesota would help ensure access to electric versions of some the most popular pick-ups, like the electric Ford F150 expected to come out next year.

- Clean Cars Minnesota will not make owning a gasoline-powered car or pick-up more expensive. The Low Emission Vehicle (LEV) standard of Clean Cars Minnesota, which applies to gasoline-powered passenger vehicles, will save consumers far more money at the pump than the program may cost by making available cleaner and more efficient vehicles. As with other technology improvements, such as those that increase safety, there will be a small impact to the upfront cost of new vehicles. However, in this case, the improvement will save drivers more money than it costs them. An analysis conducted by the Colorado Air Quality Control Commission found that the average vehicle customer can expect net savings of over \$1,600 over the life of a LEV-compliant gasoline-powered car. And for those who choose to finance their new vehicle purchase, as 86% of consumers currently do, savings are realized on day one.

- Clean Cars Minnesota is not just relevant to the metro area. Minnesotans living outside the Twin Cities Metro Area want Clean Cars Minnesota too. And people in Greater

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Minnesota stand to benefit the most from more fuel-efficient cars and trucks. Why? Because driving longer distances mean higher fuel costs, which means cost savings from more fuel-efficient cars and trucks accrue more quickly for rural residents.

Opposition to Clean Cars Minnesota has stemmed from those who traditionally oppose anything that reduces oil consumption, from general misinformation, and from anxiety over how the rule will be implemented. Two common objections are addressed here:

- “Air quality is ‘fine’ here in Minnesota.” Some opponents believe clean car standards were meant for states that have air pollution at levels that the US Environmental Protection Agency (EPA) deems as “nonattainment” per National Ambient Air Quality Standards (NAAQS). This is inaccurate for two reasons:

1. Air quality metrics from the US EPA do not include GHGs i.e. “carbon pollution” in their assessment. High concentrations of GHGs were found to endanger public health and welfare by the US EPA in 2009, and new motor vehicles were found to be a major source for them. This is a major reason why the clean car standards exist - to reduce carbon pollution in both gasoline-powered and electricity-powered vehicles.

2. Low levels of air pollution can still harm human health. In 2019, the MPCA published a report on the status of our Minnesota’s air quality called “The Air We Breathe”. It states that some levels of air pollutants that may fall below NAAQS can still harm health significantly. This is backed up by research that links the prevalence of diabetes with higher levels of soot. The MPCA’s 2019 “Life and Breath” report demonstrates that air pollution may contribute to 4,000 deaths each year in Minnesota, with higher rates of death from air pollution in rural areas than urban areas.

- “Auto-dealerships don’t want change.” They are worried that adopting clean car standards here will lead to dealerships holding cars that their customers will not want. But Minnesotans do want cleaner cars. A 2019 Consumer Report survey found 66% of prospective Minnesotan car buyers want more electric options. This includes rural residents, as mentioned above, who stand to benefit the most from both electric and more fuel-efficient vehicles.

The ability for each state to choose which set of emissions standards to enact is an assertion of states’ rights and choice. Fourteen other states and the District of Columbia have already adopted clean car standards, with many doing so 10 years ago, and the federal vehicle emissions standards have mirrored the LEV portion of clean car standards until this year, making Clean Cars Minnesota a tried-and-true set of standards. Minnesota isn’t even the only state considering adopting clean car standards at this time. States like New Mexico and Nevada are also exploring how these standards could benefit their residents in terms of cleaner air, cost savings, and more vehicle choices.

So how are two different sets of clean car standards possible? Under the federal Clean Air Act, two emissions standards were established: those set by the federal government and those created by California. Minnesota would be joining 14 other states and the

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District of Columbia in choosing the firmer standards created by California over the ones from the federal government, which were recently rolled back despite evidence that doing so would do more harm than good for Americans in terms of lost jobs and higher fuel costs.

Governor Walz has directed the Minnesota Pollution Control Agency (MPCA) to lead the rulemaking process for Clean Cars Minnesota which would explore a standard that's right for Minnesota. While some may object to the MPCA's role in this, I would point out that rulemaking is one of the many civic tools available to enact policy. While rulemaking is a tool of the Executive Branch, it derives its legal authority from statutes passed by the legislature. Minnesota Statute 116.07 lays out the prerogatives and powers of the Minnesota Pollution Control Agency (MPCA). Specifically, in Subdivision 2 "Adopting Standards," it states, "the agency shall also adopt standards of air quality, including maximum allowable standards of emission of air contaminants from motor vehicles...". This power, as granted by the legislature, enables the MPCA to conduct a rulemaking to adopt clean car standards in Minnesota.

In conclusion, I want to express my strong support for Clean Cars Minnesota. This is a bold step forward on the road to cleaner air for Minnesota communities and climate solutions for our planet.

Timothy Pera · Citizen · (Postal Code: unknown) · Feb 10, 2021 10:14 am

👍 3 Votes

I strongly support for the proposal to align Minnesota's Vehicle Greenhouse Gas Emissions Standards with California standards. It is scientifically clear that human activity is adversely affecting our climate. This represents danger to the well-being of future Americans. Electric power generation, gasoline powered vehicles, and methane gas leakage are the identified major sources of greenhouse gas emissions in the United States. So acting boldly on clean car standards is the best and possibly easiest way in the relatively short term to have a big impact on the emission of these life-threatening gases. Minnesota justifiably prides ourselves on leading the way on many issues both now and historically. The time is now to act boldly and aggressively on greenhouse gas emissions, and adopting the California standards for Minnesota states that Minnesota will help lead on this issue.

Opposing on the basis of loss of Minnesota autonomy by aligning ourselves with California seems like arguing about which size fire hose to use at a fire or of what material the fire hose should be made. The California standards are robust and effective as they stand and meet pressing needs NOW. Is it true that we would be forever tied to California with no chance of relief if we decide to modify our approach? I would think that in the future, as now, Minnesota can adjust our approach as needed.

Also, as to powering electric vehicles, of course there's no such thing as free energy. So yes we will need the capacity to charge an ever-increasing number of electric vehicles if the California standards go into effect here (and also if they do not). But Xcel Energy is already on a path to 100% clean energy I think by 2055. So I don't see the (even short term) availability of electric power as a convincing argument against.

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Dave Staples · Citizen · (Postal Code: unknown) · Feb 10, 2021 11:20 am

👍 2 Votes

I believe this will be an economic train wreck, what's going to happen to the used car market? What will happen to gas station/gas station owners? Small mechanic shops? Parts stores? This conversion will cost consumers 1000's and 1000's of dollars for what? What is the worldwide affect of the greenhouse gas Minnesota emits? Or percentage of pollution on a worldwide basis is almost immeasurable. We can move in this direction but not with such aggressive timelines.

Response:

Jane Klemz · Citizen · (Postal Code: unknown) · Feb 10, 2021 10:03 pm

Very good point!

Db CI · Citizen · (Postal Code: unknown) · Feb 10, 2021 12:23 pm

👍 1 Votes

I strongly support the Clean Cars Minnesota initiative.

Aligning Minnesota's vehicle emission standards with California's is a sensible proposal with both immediate and long-term benefits that far exceed potential costs. From an economic standpoint, the proposal makes sense because the externalities of atmospheric pollution from burning fossil fuels are enormous, nearly incalculable, and curbing emissions from our personal transport vehicles would cut that pollution, and trim those costs, considerably.

The proposal makes even more sense from a public health standpoint. The nearly imperceptible particles emitted by our cars have been shown by numerous peer-reviewed studies to cause substantial damage to lungs and other human organs, as well as to the natural environment. Cleaner cars would therefore contribute significantly to public and ecological health.

I hope you too, will support, and strongly advocate for this legislation.

Tim Ellis · Citizen · (Postal Code: unknown) · Feb 10, 2021 1:23 pm

👍 1 Votes

It seems like much of the regulatory language is borrowed from California but we don't have the same problems in MN. It is fine to require electric vehicles to be sold but what about the infrastructure? In other words, we need to have more charging stations! Without requiring charging stations to be available at every public parking lot (like handicap slots) then electric vehicles will not be feasible. Is there a comprehensive plan for the State to require and FUND charging stations to be as common as gas stations are now?

Christopher Erickson · Citizen · (Postal Code: unknown) · Feb 10, 2021 1:30 pm

👍 2 Votes

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I am a proud owner of an all electric EV (Chevy Bolt) which I bought locally new. It was very difficult when I was shopping to be able to find an EV with the greatest range and options because of the limited choices available in Minnesota. I am very pleased to be able to buy locally, but if Minnesota were to approve these proposed rules for ZEV and LEV, there would be greater choice. So many of the auto makers are already gearing up to increase their availability of electric vehicles, but if Minnesota does not participate in these rules, customers will have to go to other states to purchase the vehicles they desire, and the auto dealers in Minnesota will be out of a sale. Minnesota is a national leader in addressing renewable energy and we should be a leader in available of quality options in vehicles as well.

Nobody HAS to buy an electric vehicle, but those who do wish to should have the widest options available to them.

Thank you
Chris Erickson

Matthew Lafontaine · Citizen · (Postal Code: unknown) · Feb 10, 2021 1:43 pm

👍 2 Votes

I support the proposed rule for strong greenhouse gas emissions standards for cars. It is clear that strong action is needed because MN is not on track to hit its emissions reductions goals of 30% by 2025 and 80% by 2050

(<https://www.mprnews.org/story/2020/12/18/minnesota-moves-ahead-with-clean-car-rules>). This rule will certainly be a step in the right direction.

As for the carmakers association's assertion that the state should focus on bolstering demand instead, there's no reason this needs to be an either/or! (ibid) Do both.

I lived for 3 years in Oslo, Norway. There are electric cars all over the place and it's a great sight to see. These policies work, if our state is willing to put its money where its mouth is to fight climate change.

Don Arnosti · Citizen · (Postal Code: unknown) · Feb 10, 2021 1:53 pm

👍 2 Votes

I strongly support the adoption of the Minnesota Clean Cars Rules for several reasons:
1) These rules are about increasing access of Minnesotan's to existing "clean cars" - plug in electric and fully electric vehicles. Presently, manufacturers do not distribute all their models to Minnesota - offering many only in "Clean Car" states. I know, because I had to drive to Missouri to get our plug-in Ford C-Max in 2014 (I was told to my face by a Ford dealer in Minnesota that "no one wants those" when asking for their availability.) In 2019, we shopped on-line and selected a Hyundai Kona as best meeting our needs for a fully electric car. We could find none closer than Baltimore. Local Hyundai dealers could not order the car for us. We settled for a Nissan Leaf, which we like, but still wish we could have bought the car of our choice locally.

2) Living in the metro area, on certain days, the buildup of air pollution triggers an asthmatic reaction in me. It is very uncomfortable, and medically concerning. I've spent thousands on medical costs treating an avoidable circumstance. With these rules, we should reduce particulates and other pollutants from transportation in our air - improving the health of many. (The pollutants emitted even at coal-fired power plants are better controlled than from auto tailpipes.)

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3) As an owner of both a plug-in electric vehicle, and a fully electric vehicle I know that the operating costs are much lower than the many gas vehicles I've owned over decades. The slightly higher initial cost is more than paid-for by lower fuel and maintenance. It is in the public interest to allow Minnesotans access to these vehicles which are more affordable to own.

4) Clean Cars rules will help decrease green house gas emissions from personal transportation - through the voluntary purchases of many fellow citizens of the wider array of automobiles offered for sale after their adoption. I have children, and hope to have grandchildren: this is the least we can do to help assure a less-unstable climate for their future.

Josh Jacobs · Citizen · (Postal Code: unknown) · Feb 10, 2021 2:16 pm

👍 3 Votes

I'm against this as much as I'm against Tim walz, this is an absolute joke and needs to be stopped now. If you want California laws live in California, all this will do is add more tax and fines. If you want to do something to help Minnesota, get rid of walz and ditch this dumb idea!

Joe Fitterer · Citizen · (Postal Code: unknown) · Feb 10, 2021 2:50 pm

👍 2 Votes

I strongly disagree with the rule change. This would only cost the tax payers more money in everyday life. People that have a long commute , cannot use an EV, and cannot afford one. Plus the energy used to create the electricity isn't that clean itself. People that have older vehicles that aren't going to pass California style emissions are just going to find a way around the testing. This will be a giant waste of tax payer dollars running the testing sites.

Jason Gorr · Citizen · (Postal Code: unknown) · Feb 10, 2021 3:30 pm

👍 3 Votes

This rule change is

1) not following proper protocol and methodology, meaning through direction to the MPCA and without use of the elected representatives in State Senate and House, the Governor is attempting to circumvent the proper process and take advantage of his highly contested and progressively tyrannical 'Emergency Powers'. This is not how our 3-tiered, constitutional system is supposed to work with its checks and balances.

2) the 'California' standards are not appropriate for a MN environment. Both environmentally and politically speaking >> this was voted on by California lawmakers and NOT MN ones...

3) this 'cost be darned' process is not being suggested nor implemented properly either. Im this nation's current economic climate, this process would ultimately cost working households the most money,, with significant increases in both commuter and purchase costs, not to mention small business owners dependant on transportation costs...

Response:

Jane Klemz · Citizen · (Postal Code: unknown) · Feb 10, 2021 9:58 pm

Here here!! Thank you for bringing this up!

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Mary Master · Citizen · (Postal Code: unknown) · Feb 10, 2021 3:47 pm

👍 3 Votes

Re: Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards-Clean Cars Minnesota, Minnesota Rules, chapter 7A23; Revisor's ID Number 04626, OAH docket number 7 1-9003-36416

Dear Judge Palmer-Denig:

I do not support this proposed California emission law change. California's winter average 50 degrees. In Minnesota, our average is 15 degrees. The past week we have suffered through sub-zero nightly temperatures around ten below. We live in Minnesota, and all regular batteries struggle to maintain a charge in our frigid winters. Not everyone has a garage's luxury to house their car and its battery even minorly to protect it from the elements. These electric batteries currently run over 5,500 dollars to purchase. Many Minnesotans can not afford a \$5,500 car, much less a replacement battery costing that much.

Of environmental importance, electric batteries require cobalt in their manufacturing process. Cobalt manufacturing is exceedingly harmful to both the earth and the people mining it. In our enthusiasm to improve the environment in one location of the world, are we really ok with devastating the environment and causing lung disease and cancers to the 40,000 plus children that would be mining it for us? None of us should feel ok using child labor to provide us with the means for our clean energy car battery. Here is a new article.

Here is a clip from the United Nations Conference on Trade and Development dated July 22, 2020. The website is: <https://unctad.org/news/developing-countries-pay-environmental-cost-electric-car-batteries>

“ Nearly 50% of the world's cobalt reserves are in the Democratic Republic of the Congo, which accounts for over two-thirds of global production of the mineral. About 20% of cobalt sourced from the central African nation comes from artisanal mines, where some 40,000 children work in extremely dangerous conditions, according to UNICEF, the UN's children's agency. The dust from excavation may contain toxic metals, including uranium, linked to health problems such as respiration diseases and congenital disabilities and cancers.”

“The environmental risks are just as worrying. Cobalt mine sites may contain sulfur minerals that can generate sulfuric acid when exposed to air and water. This process, known as acid mine drainage, can devastate rivers, streams, and aquatic life for hundreds of years.”

After doing a few minutes of research, there is some Cobalt mining available here in Minnesota. So are we going to dig up and pollute our Northern Minnesota land around these cobalt mines and pollute our rivers and lakes? If this rule goes through, I hope jobs would be created here in Minnesota, and safety precautions for adult cobalt miners could be taken versus just using child labor in the Congo.

I think the option of more electric cars should be available but not mandated. I think a

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study regarding the loss of jobs and the negative economic impact of Minnesota no longer using ethanol or biodiesel should also be seriously studied and considered before any mandates are considered. Thank you for your time.

Lee Morgan · Citizen · (Postal Code: unknown) · Feb 10, 2021 4:03 pm

👍 2 Votes

I support adopting the California standards, formerly the U.S. standards.

A key piece to reducing transportation carbon emissions will be consumer behavior. Regulating suppliers will be much easier if consumers are "with the program".

As the owner of a Chevy Bolt, I want to share my insights.

Electric cars (zero emission) are the future. My Bolt is safer, easier to drive, vastly less expensive and more fun to drive than my English sports car.

Range anxiety is a serious issue, but we have found that over 95% of our driving is well within the range of our Bolt, even in the winter with a reduced range of about 132 miles.

We bought our Bolt from the Chevy dealer in Annandale. The Chevy dealer/s in St. Cloud do not carry the Bolt, presumably because of the cost to train their staff.

Two changes will really help with consumer adaptation of the electric cars (zero emission): 1) more charging stations, 2) more dealers, who represent manufacturers with EV's, make the cars available to their customers. If you can tackle these points it will go a long way in getting consumers on board. From my experience dealers seem to be more of an obstacle to EV's than the manufacturers.

I believe every Chevy dealer should double as a charging station, even if they do not sell the all-electric Bolt. Maybe that will encourage them to offer the electric cars for sale.

Lee Morgan

Response:

Nick Nohava · Citizen · (Postal Code: unknown) · Mar 11, 2021 11:45 am

People are fleeing California because of their terrible policies in record numbers. But yeah. Lets adopt them here.

Korey Cotter · Citizen · (Postal Code: unknown) · Feb 10, 2021 4:26 pm

👍 4 Votes

I do not agree with adopting California emissions standards. I have worked in the auto industry and have an education on why we have the emissions in place.

1) lets start with where they started, in the bay area of California there is a video called "clearing California Sky's" that explains how the California Air Resources Board (CARB) was originally put together to monitor vehicle emissions on humans back in the 1960's

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what the study found is that Nitrous gases (NOx) Hydro Carbons (HC) are the 2 main irritants in human lungs from combustion engines. Through the years since then we have learned how to clean up the tail pipe by adding catalytic converters and other emissions control devices to clean it up leaving H2O and CO2 coming out the tail pipe. The more of these to things you have coming out of an engine is the more efficient the engine is and the more complete the combustion process was.

2) Remember when the hybrids where all the rave about 10 years ago? Toyota sold more 3rd generation Priuses more then anything for a few years. Well here's the deal with ALL lithium ion batteries that are the core source of power they only last about 10 years before they need to be replaced. Selling someone a vehicle and telling them it will need a \$10,000 engine in a few years makes little to no sense and would deter me from buying any vehicle. Oh you will just trade it in/sell it and get a new one? Wrong law states it has to be in working order when you do that so you are out the cost of that battery.

3) As of right now we have no way of properly disposing of these Lithium ion batteries. They go sit and rot in warehouses right now as we have no idea how to dispose of them properly.

4) Is our energy grid up to the task? Californians is not, with the amount of money they have forced to have utility companies to switch to green energy they have not been able to update the power grid and multiple electrical companies have gone under as a result. The state also has massive rolling blackouts in the summer time. What if that happens here in the winter and families freeze to death. Who is responsible?

5) The cost of cars will go up. you can get into a cheaper gas vehicle for under \$20,000 EVs start in the \$30,000-40,000 tax range. This is harder on the poor and middle class trying to get into a car.

Remember when you where a teenager and your parents said if you could find a cheap car or get the old clunker in the driveway running its yours? that will no longer happen. again hurting the poor and middle class as they cant afford these vehicles.

6) taxes. People get rebaits now for owing a fuel efficient vehicle like a Hybrid or EV how long can we sustain that? where is the money coming from? Also with no gas and no gas tax where are we getting money to repair and create new roads? are you going to raise taxes? we're already taxed high enough as is. Are you going to charge me my the mileage i drive? that's unfair what if I live an hour out from work? that will again hurt the poor and middle class.

7) how much is emissions testing going to cost. is there infrastructure in place for shops to fix this issue?

8) it will hurt our farmers. Redline diesel is hard on modern day diesels emission systems. It is supposed to be the same as regular diesel now just dyed red for tax purposes. Again my auto background comes into play. It may be regulated that way but is still a sub par fuel. It's it so bad that farmers risk the fines of removing the emissions system so they can get a better life out of their diesel trucks.

Paul Ba · Citizen · (Postal Code: unknown) · Feb 10, 2021 4:27 pm

 3 Votes

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I have read the proposal and read many things about emissions from news stories to studies. I recently read an article on NPR that stated that the MPCA is not meeting the goals it set out for emissions. However, it also indicated those were "lofty" goals. CO2 emissions have been declining in the United States. The NPR article indicated that rates are down about 8% in Minnesota. Other countries like South Korea, Iran and China have rising rates of CO2 emissions. As a matter of fact South Korea grew 124%, Iran grew 137% and China grew 243%. This is important to note because I think people in the United States believe that if we fix the problem in the U.S. the problem will be solved. Legislators want us to bear the cost of low emissions and there isn't a way to guarantee that the world will get there.

Another poster noted: "According to a press release by the Walz administration, the CA car regulations would reduce annual CO2 emissions by 2 million tons a year--about 1.3 percent of total state emissions of 2016, according to the MPCA's website." That isn't very much. Furthermore, these so called ZEV's would still use fossil fuels to charge them and those do cause emissions--was it taken into account that these ZEV's would be charging with fossil fuels further driving up emissions from electricity generation? Also, we are not taking into account the future of energy--just kicking that can down the road as our politicians always do. What about the lack of ability to recycle solar panels, or turbines? What about the pollution the lithium batteries pose to the environment? Are we just going to say "be damned to anything else! We must adopt California emissions!"?


What about the light rail that is going to reduce traffic and pollution from cars? Did we spend billions on rail to just move on to the next thing to not determine how much that helps?

Walz and the MPCA want our emissions issues to be resolved now. Unfortunately, that simply isn't going to happen. We know it takes time to see the impacts of the changes we have made. We are headed in the right direction and we need to do more but this is a very drastic approach that will harm Minnesota families and those who with low income. Furthermore this will likely drive businesses from Minnesota.

We need to promote ZEV's and ensure people can "fuel" those vehicles when they drive them with electricity that doesn't compound the problem. We need to incent people to want those vehicles, like California did. People do not choose electric vehicles because they are different and in their mind difficult to deal with--it needs to be easy.

Finally, simply pointing to the California regulations and saying "yeah, us too" is reckless. If the MPCA wants to adopt regulations from other places those need to be a part of Minnesota law--not pointing to another states website and saying that Minnesota must to adhere to those. I am not in favor of adopting every rule from California because many of those simply don't apply here for many reasons. For the MPCA to say that we must adopt all the California regulations by pointing to another states website tells me that everyone working on this project should be fired because you don't know what you are doing. You are just passing the buck to have someone in another state dictate our regulations in Minnesota. That isn't ok.

Robb Fehrman · Citizen · (Postal Code: unknown) · Feb 10, 2021 5:29 pm

 2 Votes

Why do we need to adopt new standards? Current vehicles actually are pretty fuel efficient and clean. If we eliminate greenhouse gasses the temperature will actually rise, which I believe is the current argument, which is actually a false narrative. Warmest year temps in MN on record, 1897 i believe, 1931 is #2, 2001 is #3 warmest year temps on record. The climate IS changing & always will, we humans are powerless to halt it, foolhardy to think we can, stupid to adopt rules that will have no effect on the climate. If

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the climate never changed where would we be living now? Atop a glacier? Contrary to popular belief, WE ARE NOT IN CLIMATE CRISIS!!! We just are now numerous enough & some people live in enviroments not meant to support the people are living there

John Moore · Citizen · (Postal Code: unknown) · Feb 10, 2021 5:34 pm

👍 2 Votes

horrible plan. plastic intake manifolds, turbos, direct injection, 8 speed transmissions...all of the technologies that were pushed by the emissions standards have resulted in reliability problems that have been more costly than the scant amount of fuel saved. cars only last a few years now because of it, it is horribly destructive to the environment to replace them so frequently as a result, and all it accomplishes is to make it harder for poor people to survive because the car prices are astronomical. those ivory tower legislators don't know the first thing about cars and have the hubris to tell people how to make them.

Response:

Scot Adams · Citizen · (Postal Code: unknown) · Feb 22, 2021 6:35 pm

The car makers are already making the electric vehicles. The only question is whether any of them get sent to MN. I also have some problems with regulations that push up the cost of vehicles, but Clean Cars MN isn't part of that. It simply requires that zero emission vehicles be available in MN, so that people who want to buy them have that choice. Currently, unless you want to buy a Tesla, it's difficult to find such cars because the automakers send them to ZEV states. This simply puts MN on an equal footing with those states, so that we can have more choice.

Steve Wilson · Citizen · (Postal Code: unknown) · Feb 10, 2021 7:34 pm

👍 1 Votes

I strongly support adopting the Minnesota Clean Car Rules. I have read all the anticipated problems identified in the comments above if the rule is adopted. If looked at without regard to the future, yes, some seem significant. However, if we don't adopt the rule, twenty or so years from now they will seem trivial in comparison to the climate-disruption consequences we will all suffer.

Jane Klemz · Citizen · (Postal Code: unknown) · Feb 10, 2021 9:48 pm

👍 1 Votes

I do not support Minnesota Clean Car Rules. If we adopt this in Minnesota, we, the citizens, will lose freedom of choice on which automobile we can drive. We live in a state that often receives a great deal of snowfall and subzero temperatures.. I do not foresee many electric cars being able to handle the snow well. Buying cars, of any sort, that are even partially electric, hikes the price a considerable amount. To top this off, the transfer of the majority of citizens driving electric cars will require that places install charging stations, which will cost the state and businesses more money to accommodate the higher population of battery operated cars.

Now, we must also consider the outstate areas. Many of our citizens are farmers or a

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variety of other trades that are stuck driving large vehicles to tote the tools of their trade around with them. How is this going to affect them? These citizens have a great deal of money invested in the vehicles and machinery that they MUST use simply to earn their livelihood. The Clean Car Rules could also affect the type of fuel blends that will be available for use. Often farmer's equipment requires a specific kind of fuel to keep the machinery running well. Even if it is available, will they be taxed because they are bound by the equipment they have to use? We must make decisions taking every citizen into consideration.

Minnesota is a recreational state. We fish, we hunt, we camp, we spend our time in a variety of ways enjoying the many lakes that span the entire state... This is the thing that makes Minnesota so alluring! Because of this, many citizens have items of recreation that they have to trailer around. I am afraid that those citizens will be forced into choosing a vehicle that does not fit their needs, simply to follow the Clean Car Rules. It can not be assumed that everyone that has some form of recreational item, is affluent enough to purchase yet another form of transportation for daily use. It concerns me that those citizens will be penalized for driving vehicles to support their form of recreation. This is not right.

Respectful submitted,

Response:

Scot Adams · Citizen · (Postal Code: unknown) · Feb 22, 2021 6:31 pm

Those who do not want to buy an EV should simply not buy one. There are plenty of gas-powered cars and that would not change under Clean Cars MN. The problem is that, for those who *do* want to buy electric, it's hard to find anything except a Tesla. Why not opt for more choices?

Clean Cars MN would allow MN to work on an even footing with all the ZEV states, where, currently, automakers send their electric cars. What makes MN so much less important than, say, Colorado? It's really our own choice.

Jane Klemz · Citizen · (Postal Code: unknown) · Feb 10, 2021 11:00 pm

👍 1 Votes

RE: Everyone that says that the vehicles are fine to charge at night at home... There are many citizens that drive all day, stopping at many different locations. I have a family member that is a pest technician and in the warmer months he is out from sun up to sun down. He tells his scheduler, His only limitation is that he can't do pest control after dark. That is how he rolls. Do not assume that everyone drives to work in the morning and home at night.

Response:

Scot Adams · Citizen · (Postal Code: unknown) · Feb 22, 2021 6:24 pm

EV tech is changing so fast that I have to think that it'll soon be advantageous for almost everyone to own an EV, if they can find one. However, to the extent that that is not yet the case, the car buyer who does not want an EV should simply not buy one. Nothing about this rule will change that.

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Debra Riggs · Citizen · (Postal Code: unknown) · Feb 11, 2021 11:33 am

👍 2 Votes

I would have bought an EV in 2018, but could not as the charging limitations for long trips made this impossible. Friends advise they cannot buy the EV model of their choice in MN. If MN joins the 14 other states and DC in adopting the Clean Car guidelines, availability of fast charging stations would improve and drivers will be able to buy the car of their choice.

The reduction of carbon emissions will improve quality of life and save lives. As transportation is the leading cause of climate pollution, we must encourage new modes of travel to reduce said pollution. EV's are the way forward. GM and other auto makers have committed to EV's and MN should too.

Jo Miller · Citizen · (Postal Code: unknown) · Feb 11, 2021 2:32 pm

👍 1 Votes

I support this MPCA rule because it lowers emissions, has minimal negative economic impact and quite large positive economic impact, plus improves the health, climate and environment in Minnesota more equitably:

7023.0150 SCOPE AND INCORPORATION BY REFERENCE.

1.4 Subpart 1. Scope. To reduce air pollution from vehicles in the state, parts 7023.0150 1.5 to 7023.0300 establish standards for low-emission vehicles and zero-emission vehicles.

The point of the rule is to reduce tailpipe emissions. Does it do that? Yes.

Per the MPCA attached documents (page 25, Appendix 1: Technical Support Document), Adopting this rule for LEV and ZEV cars will reduce Greenhouse Gas emissions by 8.4 Million tons CO₂equivalent overall and reduce GHG by 7.1 Millions tons CO₂e as measured from tailpipe emissions.

MN revenue from lost gas tax is made up by higher sales tax on vehicles. Car buyers benefit from lower operating costs of EV cars. "Consumer Reports" in 2020 articles says Electric Cars have 10% less maintenance costs and 50% less fuel costs than Internal Combustion Engine Cars. DriveElectric.org lists 40 EV models in 2021 across the US, but fewer than half of those models are commercially available in MN - due to a lack of a ZEV rule. Lack of availability encourages buyers to use internet car-buying companies like Carvana, and MN Car Dealerships lose sales.

\$560Million to \$3.2 Billion in health benefits to all people in Minnesota is significant, as referenced on page 81 of MPCA documents. The maps show tailpipe pollution disproportionately impacts BIPOC people, especially in cities. Passing this rule would increase MN's health in an equitable way.

Thank you for considering my comments in favor of Rule (aq-rule4-10o).

Steve Jorissen · Citizen · (Postal Code: unknown) · Feb 11, 2021 2:40 pm

👍 1 Votes

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I support the Clean Cars Rule for Minnesota for two reasons:

1. Minnesota is falling behind the emissions reduction goals set in the 2007 Next Generation Energy Act largely because the transportation sector has not reduced emissions (MPCA 2018).
2. Over 60% of Minnesota consumers would consider an EV for their next car purchase but supply of EVs is limited in Minnesota. Automakers bring their EVs like the Subaru Outback PHEV to the 13 states that have adopted similar standards and you can't find them in Minnesota. Adopting this rule would bring more choices to consumers.

Jord Kel · Citizen · (Postal Code: unknown) · Feb 11, 2021 4:26 pm

👍 2 Votes

I do not support this. What do people do in winter months? It is fact the there's 40% battery drainage in cold weather with EV. What happens if we too get rolling blackouts (like CA) because we don't have the energy to support them, except there's no threat of death in CA because they don't get deadly cold. This is MN not CA. We should not be making decisions based on data completely different from ours, weather, population, and emissions all are different.

Response:

Nick Swanson · Citizen · (Postal Code: unknown) · Feb 20, 2021 4:58 pm

While there are some vehicles under some conditions that can see range reductions as great as 40%, this does not tell the whole story. Many newer EVs are now including heat pumps to improve cold weather efficiency such as Tesla's Model 3 and Y as well as the Hyundai Kona. Additionally, preconditioning batteries (warming them up) while connected to a charger further reduces the range impacts of cold weather. If we want to make decisions based on similar weather, Norway, Iceland, Sweden, and Finland make up four of the top five countries for (PH)EV as a percentage of total sales. Clean Cars MN does not match what is being accomplished in these countries, but it is a step in the right direction.

Cynthia Brekke · Citizen · (Postal Code: unknown) · Feb 11, 2021 7:50 pm

👍 3 Votes

To: Honorable Judge Palmer-Denig

From: Cynthia Brekke
Tamarack, MN

RE: Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards—Clean Cars Minnesota, Minnesota Rules, chapter 7023; Revisor's ID Number 04626

OAH Docket No. 71-9003-36416

I am against adopting California's emissions standards and will outline some of my reasons.

First, the Governor seeks to accomplish these changes via executive fiat instead of allowing it to go through the legislative process. This isn't an extension of his emergency powers and it should, actually, go up to the ballot and be decided by the entire population, since it will affect all of Minnesotans. If the Governor would like to make these changes applicable to densely-populated areas, to reduce the pollution around the larger cities, that's one thing. However, that's not what he's proposing. I am against

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having another state impose it's standards on our state. We have our own, sovereign state and we the people can decide what we need to do in Minnesota. Through the Governors executive fiat, we don't even have a voice or representation.

State Rep. Dale Lueck, R-Aitkin, put it best: "Walz is asking the citizens of Minnesota to outsource Minnesota's environmental policy to an unelected board in California, rather than bringing the matter before Minnesota's elected representatives to actually decide on the best way forward. Mandating electric vehicles and banning gas powered vehicles is where this appears to be headed, as what California does Minnesota will also have to do." I agree with his reasoning.

Second, I agree that this will increase not only the cost of vehicles, but cut off freedom of choice. The technology is still not where it should be and only looks to increase the cost of transportation of goods, services and individuals. Whether or not it will actually make a big difference in our state, regarding air quality, isn't clear. The only real problems in that regard seem to be situated in the higher population areas, bigger cities, where emissions and smog are prevalent.

One point I noticed Rep. Lueck didn't make - added fees for EV's. According to myev.com, 18 states now have added fees to make up for lost gas tax revenues. Illinois was the most recent addition to the list, with their legislature proposing a levy of \$1,000.00 annual registration fee on all EV's, up from a previous standard charge of \$17.50. Cooler heads prevailed, but one can see how this could easily be abused. How many fees can politicians find to impose? As many as they can justify to increase their spending.

Third, Consumer Reports and Triple A performed tests on two of the top EV's. Their conclusions were much the same: EV batteries lose range due to the added power demands that come from operating the car in cold weather, not due to cold weather itself.

"When it comes to range reductions, this is largely a factor of increased electrical loads on the battery," said Sam Abuelsamid, senior analyst at Navigant, an automotive research and consulting firm. "In a typical gas-powered car, the engine generates a lot of heat, which is then used to warm the cabin. An EV doesn't have an engine, and so it must rely on other devices to produce that hot air— those are a direct drain on the battery. The colder it is, the more energy is needed to keep the cabin at a comfortable temperature.

"Unfortunately, cold temperatures will always have a negative impact on range," Abuelsamid continued. That plays out in all sorts of ways. "Breathing means condensation on cold glass, which requires use of electric defoggers. Longer nights mean more use of headlights. And cold tires, snow, and slush will increase rolling resistance, all of which will reduce range." He concluded: "Sadly, no matter how sophisticated your software is, Mother Nature and physics will always win out in the end."

In closing, electric vehicles may yield an advantage with short-range transport, which would benefit large, populated areas, but are not suited for individuals in the outstate areas where they perform dismally due to six months of cold weather and inclement road conditions. Minnesotans can determine when/if we desire stricter standards and what those standards are. People already have a choice to own EV's, most prefer not. There's a reason for that. The technology hasn't been perfected, they are expensive to produce and run for the average person, and are not yet practical or efficient from a financial or operating perspective.

I respectfully request that the Governors proposal to adopt California's emissions

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standards be refused.

Response:

Scot Adams · Citizen · (Postal Code: unknown) · Feb 22, 2021 6:21 pm

The rule-making process is not legislative, and it would be nice if the MN Senate were up to the task of dealing with climate change. For now, the process of deliberation has to be done here in this forum. I hope we can involve the legislature at some point.

The argument about choice is exactly backward. Right now, without Clean Cars, we in Minnesota do not have the choice to buy electric vehicles, except Teslas. The point of Clean Cars MN is to increase the choice so as to make electric vehicles available for those who want to buy them. Why should we not have as much choice in our state as the ZEV states do?

It's unlikely that Clean Cars MN will have much effect in Greater MN, unless demand for electric vehicles increases dramatically there. I expect most car companies will simply put their EVs in the metro area. Anyway, if an EV does show up in Greater MN, nothing requires anyone to buy it.

Cole Williams · Citizen · (Postal Code: unknown) · Feb 11, 2021 7:57 pm

👍 0 Votes

I support the Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards—Clean Cars Minnesota, Minnesota Rules, chapter 7023; Revisor's ID Number 04626. Carmon emissions is a driving force for climate change and vehicles emissions in the U.S. is the largest contributor to carbon emissions, near 29%. This would give consumers options and allow them to make choices for that are right for them while not diminishing those that want to continue to own and operate gas vehicles.

Rhonda Hopkins · Citizen · (Postal Code: unknown) · Feb 12, 2021 8:38 am

👍 3 Votes

Is anyone missing the fact that Governor Walz is making this move through the administrative rulemaking process - bypassing the legislature to get this bill passed? Your voices are not even being heard, except here, where most Minnesotans will not see it.

Response:

Scot Adams · Citizen · (Postal Code: unknown) · Feb 22, 2021 6:14 pm

No, I have not missed this and it bothers me a little, too, though I'm willing to live with it.

This is our chance to deliberate, so we should make the most of it.

Do you have any objections to the rule?

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Debora Plumley · Citizen · (Postal Code: unknown) · Feb 12, 2021 9:16 am

👍 1 Votes

Both my husband, Roger Plumley and I strongly advise our MN legislators to insist this adopting the State of California's car emission standards needs to be thoroughly investigated by our legislative body. It is foolish to take on another's state's standard who's has such vastly different environment: weather, population, % of land that covers large cities and traffic to name only a few differences. Minnesota has unique challenges and we need to use information from all sources to make wise choices for ALL the people of our great State of Minnesota.

Ron Thomas · Citizen · (Postal Code: unknown) · Feb 12, 2021 11:03 am

👍 0 Votes

I am pleased to support the proposed rules adopting vehicle greenhouse gas emissions standards. The rule makes sense. It will help reduce the carbon emissions from the transportation sector which is the primary source of climate pollution and it will help improve the quality of air that we all breathe.

Thomas Moran · Citizen · (Postal Code: unknown) · Feb 12, 2021 12:49 pm

👍 0 Votes

I am strongly in favor of the Clean Cars Minnesota proposed rules.

Adam Lee · Citizen · (Postal Code: unknown) · Feb 12, 2021 1:12 pm

👍 2 Votes

My name is Adam Lee, I am a 3rd generation car dealer whose family has been selling cars in Maine since 1936. When we started selling cars the model T was the most popular car on the road. Most years we sell roughly 10,000 new and used vehicles. We are Maine's number 1 volume Ram Truck Dealer, Jeep dealer, and Hybrid and electric car dealer. I am here to tell you that you can do both; sell huge trucks that may not get the best gas mileage and electric cars that burn no gas.

The ZEV program has been good for Maine, both for car dealers, our customers and for our environment.

Electric cars and plug-in electrics are not only "clean cars" they are fun to drive and less expensive to maintain. Most fully electric cars require almost zero maintenance, no oil, no radiator, no transmission, no gears, no spark plugs and best of all, no gasoline. While the upfront cost may be a little higher, our customers have found that they are consistently cheaper to operate.

I understand Minnesota is considering joining the 12 states that have adopted the Zero Emission Vehicles (ZEV) program starting with 2025 models, I strongly recommend you do this.

Keep in mind, the burden of complying with this program falls on the manufacturers.

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The dealer, that's me, has no obligation to sell anything other than what their customers ask for. No benchmarks, no targets, I sell what they want and right now they want electric cars.

I expect Minnesota dealers will see the same success I've had under the program, and see the same steady EV sales growth I have. And if you are worried about the cold, well Maine gets pretty cold too. The cars will have a slightly shorter range, but they still work just fine.

If lawmakers or local dealers have any questions about my experience, feel free to reach out.

Sincerely,

Adam D. Lee
Chairman
Lee Auto Malls

Response:

Kyle Nelson · Citizen · (Postal Code: unknown) · Feb 13, 2021 6:39 pm
Thank you for this perspective.

Response:

Alyssa Lee · Citizen · (Postal Code: unknown) · Mar 10, 2021 10:16 am
Your comment may offer a unique perspective, but I feel this thread should be open to only Minnesotans, as we will be the ones affected by this rule. I find it strange how people across the country know about this thread, but many Minnesotans have no idea where to voice their concerns on this issue. And that's where part of the problem lies. As you had commented on my post, I will address a few points here. 1) No, I am not a lobbyist, and I don't appreciate people just assuming that about someone who is in opposition. I'm a Minnesota citizen who takes the time to talk with employees from our local dealerships. And what I had stated in my original post when it comes to the dealerships were their same concerns as well. It's interesting how local MN dealerships don't know about this thread, but a dealership in Maine does. 2) Minnesota has much different circumstances than Maine. Especially with the surrounding states providing much economic competition for vehicle sales. 3) Many Minnesotans want this to go through the legislation. Right now this is being pushed through the back doors, and nobody knows how to voice their concerns on it, or where to voice their concerns on it, or that it's even happening. 4) Many people simply don't want to adopt rules from California. And if clean air is the goal we should have people capable in Minnesota to figure out rules specific to our state. 5) Angela Carlson brings this up in all of her comments. "I agree that many different factors affect air quality and that the link between emissions and air concentrations is complex. This is precisely the reason we need to look at air quality/concentrations - to determine if the hypothesis (that reducing CO2 emissions from cars will improve air quality) was correct. If this policy has not produced a measurable effect in other states, I would be skeptical of its effectiveness in MN". Many people are concerned about this exact thing, and you can read her comments for deeper understanding. But if we're not actually going to compare the effectiveness of these rules, it doesn't make sense to add more rules and regulations.

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Isaac Orr · Citizen · (Postal Code: unknown) · Feb 12, 2021 3:23 pm

👍 0 Votes

Does the MPCA consider the emissions involved with manufacturing electric cars vs ICE vehicles? The measurements of well-to-wheel will make more sense if the agency considers the life-cycle emissions for manufacturing ICEVs and EVs, as these can lead to significant up-front emissions that should be considered in determining whether the ZEV rule is reasonable.

Andrew Kirchoff · Citizen · (Postal Code: unknown) · Feb 12, 2021 7:46 pm

👍 2 Votes

I am from Hutchinson, MN and opposed to this for several reasons. First, it avoids the legislative process. As citizens we elect legislators to enact laws on our behalf. The topic up for discussion completely circumvents our representative government and places too much power in bureaucrats and appointed panels. Second, tightening the emission standards will increase the cost of motor vehicles which ultimately hurts the lower income class the hardest. Call it unintended consequences. Third and my final point, emissions have been decreasing for decades due to improvements within powertrain technology. This downward trend will continue and could very likely increase its pace as EV's become more common place. It seems this is an attempt to solve a questionable problem that is naturally dwindling.

Response:

Scot Adams · Citizen · (Postal Code: unknown) · Feb 22, 2021 6:10 pm

I have some agreement with your first point. We need a legislature that is prepared to deal with climate change.

The second point about costs: For anyone who thinks EVs are too expensive, they have a way out. They can simply buy a regular gas-powered car. Nothing in the rule would require anyone to buy electric. It would only require that the cars be available.

For the third point, much depends on your concerns over climate change. If we had started the EV transition fifty years ago, then we could afford to move slowly. I don't see this as a "questionable" problem.

Bill Kaemmerer · Citizen · (Postal Code: unknown) · Feb 13, 2021 12:06 am

👍 2 Votes

I am strongly in favor of the Clean Car Rule proposed by the Minnesota Pollution Control Agency. I believe many comments from persons expressing opposition to the rule have made erroneous points, and I ask the judge to consider the following:

- Some comments are from persons reacting as if the rule will force them to purchase an electric car they do not want. However, the rule applies only to vehicle manufacturers, not to dealerships, let alone consumers. If the rule results in requiring 7.5% of vehicle sales (fleet-wide) to be zero-emission vehicles in 2025, that still leaves 92.5% of sales inventory for persons to choose from if they won't consider an electric car.

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- The concern that the rule will result in dealerships in rural areas of Minnesota being “stuck” with vehicles they cannot sell ignores the fact that, as I understand it, the rule’s requirements are on manufacturers, not individual dealerships, and they are fleet-wide across the whole state. It seems quite possible that a manufacturer’s ZEV and LEV sales in urban and suburban areas could attain the rule’s requirements even if none of these vehicles were provided to rural dealerships, let alone sold by them. It is not for the MPCA to determine how manufacturers and dealerships do business with one another, and the proposed rule does not do so.
 - Some comments are from persons offended by the notion that Minnesota’s standards should be following practices in California. These comments ignore the fact that, as I understand it, our state’s choice is either to follow the Federal standards of the EPA, as they have been rolled back under the last administration, or to adopt the California standards – we have no other choice. The comments also ignore the fact that over 10 other states have adopted the California standards, including “cold winter” states such as Vermont. Thus, the argument that Minnesota should instead adopt Minnesota-specific standards because of our cold winters or in order to be independent of California is specious.
 - Some persons have complained that the MPCA should not be making these rules, and that the legislature should be the rule-maker. Based on my reading of the Statement of Need and Reasonableness (SONAR) made public by the MPCA, I believe that the MPCA is within their authority to be proposing the rule, not to mention the fact that, in general, making rules is a major part of their job. Furthermore, if citizens desire that their elected representatives make the rule instead, then it is already within the purview of the legislature to hold hearings on the rule if they chose to do so. If the legislature does not choose to hold hearings on the rule, that it not a reason for the rule to be rejected.

I believe that the rule is reasonable and not overly burdensome on vehicle manufacturers for at least three reasons. First, manufacturers are already complying with the California standards in making sales not only in California, but in over ten other states. Second, the ZEV part of the rule specifies that manufacturers will begin with a year’s worth of “credits” toward their quota of percent of zero-emission vehicles sold in a given year. Third, manufacturers might readily exceed the requirements of the rule since these requirements don’t even go into effect until model year 2025, and manufacturers are already moving in the direction of increasing their zero-emission vehicle offerings. For example, as announced by an advertisement aired during the Superbowl on February 8, 2021, General Motors plans to sell nothing but zero emission vehicles by the year 2035. (The same advertisement disclosed that electric vehicles already comprise about 50% of sales in Norway, providing a rebuttal to the argument that the rule should be denied because electric vehicles are not suitable for Minnesota due to our cold winters).

I own an all-electric car (Nissan Leaf) and my experience in seeking and purchasing this car in 2019 was that its availability in Minnesota was very limited. There were only two of these cars available on the southwest side of the Twin Cities metro area, one at each of two Nissan dealers, despite the fact that the Leaf has been produced by Nissan for U.S consumers since 2010. I believe the rule requiring manufacturers to make zero emission vehicles a greater percentage of their sales in Minnesota would greatly improve their availability and enhance their adoption by the public. Based on my experience with the car, two of my personal friends expressed an interest in acquiring a Leaf, and one has already proceeded to make his purchase. This bolsters my belief that the demand for zero emission vehicles is growing. The proposed rule will prevent limited availability and limited choices of models of zero emission vehicles from continuing to be an impediment

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to the adoption of this technology, which has the potential to reduce carbon emissions and contribute to the mitigation of climate change, to the benefit of us all.

David Homans · Citizen · (Postal Code: unknown) · Feb 13, 2021 3:31 pm

👍 2 Votes

I support the clean car rule. While this is not a perfect rule, it does constitute an important step in the right direction by ensuring that consumers have more options and more availability to help reduce climate warming by making informed choices when purchasing automobiles. This does not mandate that we all purchase ZEVs, so it does not represent unreasonable governmental interference. While we must not remain indifferent to the concerns of car dealers, we can not allow those concerns to thwart the needs and desires of the general population to live in a more habitable climate. Survey data clearly demonstrate that the general populace is very concerned about climate change - so this rule is not an example of catering to a small special interest group - rather, it reflects the will of the people. Transportation is now the number one source of greenhouse gases in MN, and converting to low emissions vehicles is one of the many necessary steps to control those sources. The auto industry understands this, and is already heading in that direction (reference GM's recent commitment). Car dealers would be best advised to understand how they can prosper in this changing economic environment; innovation, not obstruction, is the cornerstone of a healthy economy. As Louis Pasteur quipped; chance favors the prepared mind! The consumer demand is there, and as these cars are made more widely available, the associated services (charging stations etc) will follow. We did not wait until the country was already populated with gas stations before we started driving internal combustion engine powered cars. Change can be hard, but we the American People, can do this. Thank you for the opportunity to comment.

Diane Bublitz · Citizen · (Postal Code: unknown) · Feb 13, 2021 4:27 pm

👍 2 Votes

We currently are driving one hybrid vehicle and would love to be able to replace our gas powered SUV with an electric SUV. This rule would increase the availability and types of vehicles to chose from in Minnesota. Transportation is the #1 source of climate pollution in Minnesota and cleaner cars is the best and perhaps only way to significantly reduce this source.

It is my understanding that the Clear Air Act allows us two choices: stay with the current, lowered standard or adopt the California standard. As a consumer I want more clean car choices and as a citizen I want clean air, clean water and an environment that continues to support human life.

Hilda Martinez-Salgado · Citizen · (Postal Code: unknown) · Feb 15, 2021 6:02 pm

👍 0 Votes

I am in favor of the Clean Car Minnesota Rule, because it will not only stop our dependence on fossil fuel, but will bring other social benefits, like breathing a cleaner air. Outdoor air pollution was responsible for more than 4 million premature deaths around the world in 2018 (<http://breathelife2030.org>). The Life and Breath Report, published in

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2019 by the Minnesota Department of Health & Minnesota Pollution Control Agency, accounts that during 2013, air pollution in Minnesota was responsible for 2,000 to 4,000 additional deaths, 500 additional hospital stays, and 800 emergency room visits. One of the main sources of air pollution is the burning of fossil fuels, like the gasoline used in the cars that move us around.

By adopting this rule, the state would enable both, a Low-Emission Vehicle (LEV) and a Zero-Emission Vehicle (ZEV) Standard, that would bring health benefits to our communities and economic benefits to the owners of vehicles that are manufactured and sold under those standards.

It is very important to understand that a LEV standard seeks to commercialize internal combustion engine vehicles (ICE) with a higher fuel efficiency. Bringing to the market cars designed to maximize their miles per gallon (mpg), therefore costing the owner the least amount of money per mile traveled. As an example, a car with a 30mpg rate will cost less money in fuel over time than a car rated 20mpg. And as less fuel is burned, less air pollution emissions are produced that would affect our health.

At the same time a ZEV standard would bring both climate and air quality benefits since we won't be depending on fossil fuel to power our vehicles, they would be powered by electricity produced by renewable energy.

On top of that, there would also be an economic benefit. Based on information from the Department of Energy eGallon tool (<https://www.energy.gov/articles/egallon-what-it-and-why-it-s-important>), in Minnesota the cost of a gallon of gasoline is \$2.28, while a cost of eGallon is \$1.18. This means that it is cheaper to drive the same distance with an electric vehicle. (Note: eGallon is the cost of fueling a vehicle with electricity compared to a similar vehicle that runs with gasoline). At the same time the cost of operating an EV is almost half compared to that of a gasoline car. A study done by the University of Michigan in 2018, found that the average cost of operating an EV was \$485 per year compared to \$1,117 per year for a gasoline vehicle.

The economical rationale is there. Already 14 states and the District of Columbia, have adopted these types of standards and the Biden administration has asked the Environmental Protection Agency (EPA) to revise the current energy efficient standards for light-duty vehicles to make them much stricter and similar to those that California already has. Why does Minnesota want to go backwards instead of forward? Why can't the state be the progressive leader it was in 2007, when it adopted the Next Generation Energy Act??

Charles Shulock · Citizen · (Postal Code: unknown) · Feb 15, 2021 6:31 pm

 0 Votes

Attempt #2 to post a comment, apologies if it shows up twice. The attached PDF provides preliminary comments on the MPCA cost analysis. The technology cost of meeting the LEV III tailpipe standards in the analysis is too high. When corrected costs are used the regulation provides a lifetime net benefit at both the 3% and 7% discount rates.

Roger Rehnelts · Citizen · (Postal Code: unknown) · Feb 16, 2021 4:11 pm

 2 Votes

I am opposed to the rule making in this manner. If it were good for all it should go through the house and senate and then on to the governor to be signed into law with

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bipartisan support; much like it was in 2007. I am not opposed to electric vehicles but do think it's a bad idea to push them on to those in rural Minnesota where driving distances are much greater and the need for refueling during the work day increases. I would recommend doing a test/trial period for the metro area only before expanding to rural areas and possibly avoiding the "one size fits all" scenario. You also mention light and medium duty vehicle's, I operate a construction company and frequently pull trailers, there is nothing currently available that's capable of doing this job. I recommend removing "Medium Vehicle's" at least until there is something capable of pulling a 14,000 pound trailer 300 miles without the need for a charge. I would also like to recommend proper rule making like sending this though the house and senate. This is not a dictatorship!

Response:

Scot Adams · Citizen · (Postal Code: unknown) · Feb 22, 2021 6:04 pm

This is an administrative rule. It does not go through the legislature. As someone with some conservative leanings, this bothers me, too, but, facing climate change, we need to use all the tools we have.

No one in rural Minnesota needs to buy an electric vehicle if they don't want to. This rule would simply require that some dealerships make electric vehicles available, in case someone wants to buy one. Presumably the car companies would decide that, in MN, most of those dealerships should be in the metro area, unless they perceive a large demand in Greater MN.

Wilma Skar-Jones · Citizen · (Postal Code: unknown) · Feb 16, 2021 10:16 pm

👍 0 Votes

I strongly endorse this rule change. Our future as a species is at risk if we don't address climate change, and it is vital that consumers have more eco-friendly options available.

Emily Ziring · Citizen · (Postal Code: unknown) · Feb 17, 2021 9:59 am

👍 1 Votes

Please see the attached comments from the City of St. Louis Park.

Dan Loveridge · Citizen · (Postal Code: unknown) · Feb 17, 2021 11:24 am

👍 2 Votes

I oppose this rule for a number of reasons....many are included in previous comments. However, the most significant reason is that delegating the writing of Minnesota's air emission standards to another state is NOT the right thing to do. This essentially leaves Minnesotan's with no voice, no representation with regard to the states air emission standards. Don't we have qualified people at the MPCA that can write standards that are specifically tailored to Minnesota? California is a very different state with a very different climate. I think it would be wiser to have the MPCA work with our neighboring states to have standards that are compatible with our neighbors. Do we want to be an island in the upper Midwest? How would this affect all Minnesotan's with regard to buying and selling cars in neighboring states? I see problems and cost increases for consumers with no real affect on our air quality.

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Response:

Scot Adams · Citizen · (Postal Code: unknown) · Feb 22, 2021 5:59 pm

We do have people who could write such rules, but, unfortunately, at the moment, by law, we have to either choose the CA standards or the federal standards. I even think that the car companies might oppose a proposal to change that law to have fifty different sets of standards. So it would be a challenge to go the route that you suggest.

Kathryn Murray · Citizen · (Postal Code: unknown) · Feb 17, 2021 12:00 pm

👍 1 Votes

Please see the attached comments from St. Anthony Park Community Council, District 12 - St. Paul, MN.

Stefan Collinet · Citizen · (Postal Code: unknown) · Feb 17, 2021 6:41 pm

👍 0 Votes

I strongly support the Minnesota clean car rule for several reasons:

-This will help reduce air pollution that has been shown to contribute to poor health outcomes (it makes people sick and can shorten how long people live).

-It will create new more modern jobs. Certain current jobs may become obsolete and no longer needed, but this has always been the case whenever humanity has made advances. People who took care of horses lost their jobs when cars, buses and tractors were invented. The great thing here is that those who stand to lose their jobs are being given fair warning decades ahead of time.

-It will reduce the greenhouse gas emissions footprint of Minnesotans along with the other states that latch on to this rule.

-Given the size of the California economy, changes there will force automakers to make changes to their fleets anyway. This added to changes in Europe and elsewhere mean that these changes are ultimately going to happen. Having two separate standards is the worse thing imaginable for businesses. It wastes resources and costs more. Might as well get it over with now.

Thank you for this very forward thinking piece of legislation.

Bryce Ostenson · Citizen · (Postal Code: unknown) · Feb 18, 2021 9:53 am

👍 1 Votes

I support this initiative.

This is a complex issue but we have precedents we can look to – CO and VT come to mind first – which have achieved broader adoption of EV's with knock on effects associated to infrastructure.

It was a very frustrating experience realizing how little choice there was compared to elsewhere when we purchased our LEAF in 2018. More choice will jump start a virtuous circle of effects. Talking to friends and family that are very interested, that's clear.

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Juli Ras · Citizen · (Postal Code: unknown) · Feb 18, 2021 12:45 pm

👍 0 Votes

I support adoption of the clean car emission standards. I bought a used hybrid in 2017 and loved it. When my car was totaled, I wanted to replace it with an electric option. I went to several used car dealers and new and found nothing. This was in the twin cities. I didn't have tons of time to go out of state and did find a dealer that literally had one hybrid on the lot. I bought it, however I want to have choices. I think it's important to note that these standards also would reinstate the choices we've had on low emission vehicles between 2012- 2020.

Deana Dennis · Citizen · (Postal Code: unknown) · Feb 18, 2021 2:00 pm

👍 0 Votes

On behalf of 6 employers and businesses with operations and investments in Minnesota, I write to express support for the Clean Cars Minnesota proposed rule. Clean vehicle standards are proven tools for strengthening the market for clean cars and ensuring consumers and businesses have access to clean vehicles at dealerships across the state.

The Advanced Clean Car (ACC) program has been adopted or is in the process of being adopted in 17 states and the District of Columbia. By increasing the availability and development of more efficient as well as electric vehicles in Minnesota, the ACC program would enable a more competitive marketplace and provide greater consumer choice and access to clean, cost-saving vehicles for the benefit of all Minnesotans. With businesses responsible for more than half of the vehicles on the road today, these cleaner, more fuel-efficient vehicles would not only support the state's efforts to meet the bipartisan emissions reduction targets of the Next Generation Energy Act, but also enable businesses to realize cost savings.

Clean vehicle standards are an important tool for businesses to reduce operating costs while making progress toward goals to reduce their carbon footprints. Vehicle fleets are often a major expense and source of greenhouse gas emissions. The deployment of low- or zero-emission vehicles allows businesses to cut costs and minimize the risks associated with fuel price, maintenance downtime, and supply volatility.

Adopting the ACC Program would enable automakers to plan ahead to offer clean vehicle options while providing companies and investors with policy certainty to make long-term in-state investments and catalyzing the development of new technologies and associated local jobs.

In addition to the significant and far-reaching economic benefits of clean vehicles, the public health benefits from adopting clean vehicle standards are immediate and tangible. The ACC program would put cleaner vehicles on the road—thereby improving local air quality, reducing healthcare costs, and tackling Minnesota's top source of greenhouse gas emissions.

I encourage you to read the full letter of support for the Clean Cars Minnesota proposed rule via the comment attachment. Thank you for your time and consideration.

Sincerely,
Deana Dennis

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Response:

Terry Carlson · Citizen · (Postal Code: unknown) · Mar 13, 2021 7:58 pm

Please list these employers and businesses you are speaking "on behalf of" so that we can call them to confirm.

Dave Wager · Citizen · (Postal Code: unknown) · Feb 18, 2021 3:31 pm

👍 1 Votes

Please don't California our Minnesota

John Larkin · Citizen · (Postal Code: unknown) · Feb 18, 2021 4:09 pm

👍 0 Votes

Please see attached comments.

Thomas Bullington · Citizen · (Postal Code: unknown) · Feb 18, 2021 5:44 pm

👍 0 Votes

Please support this clean air initiative. This will not only improve our air quality and the overall health of our citizens and environment, but will add to consumer choice. By making more EVs available in Minnesota, more Minnesotans will have the option to buy these popular vehicles - something they most often don't have now. When EVs are not available in our state, those who want them will go elsewhere, with all sales taxes and related employment going to other states. Many automobile manufacturers are already getting on board, stating they will only make EVs within 10-15 years. The future of transportation in Minnesota is electric. Please support this initiative. Thank you!

Dave Wager · Citizen · (Postal Code: unknown) · Feb 19, 2021 8:31 am

👍 0 Votes

Please see attached document

Response:

Scot Adams · Citizen · (Postal Code: unknown) · Feb 22, 2021 5:52 pm

Propane produces CO2, except in low oxygen, where it does something even worse.

You write: If, as MPCA believes, the number of electric vehicle (EV) models currently available in Minnesota is insufficient, the likely reason is that there simply is a lack of demand for EVs from consumers.

This is, at the very least, unclear. The biggest problem is that, if you go to most dealerships and ask to see their EVs they'll say that they've all been sent to ZEV states to get the ZEV credits offered there. They may then suggest that, if you want, you can fly to a ZEV state to do the purchase, but not every consumer is willing to go through that.

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I recently had someone explain to me that the reason EVs are unavailable is that every car maker except Tesla had decided to stop selling them. He said that Chevrolet sold Volts for a while, but then gave up. In a ZEV state, it's hard for me to believe that that misinformation could exist, because he'd probably know people who were buying electric Hondas and BMWs and Chevrolets and etc. My point is that the lack of supply can actually create the environment for a lack of demand. Clean Cars MN would help alleviate that. Why should the people of MN not be able to buy electric? What's so much better about, say, Colorado? Or any of the ZEV states?

Response:

Scot Adams · Citizen · (Postal Code: unknown) · Mar 13, 2021 9:33 pm

Those of us who actually drive electric know that this is not so. It is tremendously difficult, if you go to most dealerships, to test drive any electric vehicles. The car companies simply know that they will get no ZEV credit whatsoever, for selling electric vehicles in MN. So they don't send them here. This has become a serious problem in the last two years. This remark doesn't apply to Tesla, but it does to every other car company.

Lloyd Keller · Citizen · (Postal Code: unknown) · Feb 19, 2021 8:54 am

👍 2 Votes

I appose adapting Minnesota to the California Clean Air act. For all the reasons previously mentioned. I am for cleaning up our air, but we are not California and what fits there won't fit here. Vehicles are already too expensive, adding this act will make them even more so.

Minnesota is already one of the highest taxed states to live in, behind HI, CA, NJ, and tied with Oregon. Minnesota is also one of the top 10 (10th) most expensive states to retire in. If Gov. Waltz get his way, small businesses in MN will be the #1 highest taxed in the country.

1. I drove by the Tesla dealer on Hwy 61 in Maplewood yesterday and saw at least a dozen cars on their lot. At least.
2. Where is all the electricity to power these going to come from? Renewable energy? How is that working out in Texas right now with millions out of power. Their grid including coal and gas couldn't handle the spike. How did it work out in California when they lost a lot of power due to forest fires. Anyone with an EV was stranded when they ran out of juice. Does Minnesota have constant wind and solar power to keep us from the blackouts that CA. and TX deal with? I don't think so. We don't have the infrastructure yet to get the majority of us in EV's or the power companies completely green. Minnesota Power has stated there is no way they can become completely green by 2035 or 2040. I am for cleaner air, but adopting the standards that fit in a completely different state doesn't make sense. We should come up with our own standards that fit for Minnesota.

Response:

Scot Adams · Citizen · (Postal Code: unknown) · Feb 22, 2021 5:40 pm

Not everyone who is interested in driving electric wants to buy a Tesla. Why shouldn't people in Minnesota have the same choices as people in, say, Colorado?

Using the disasters of climate change as a reason to oppose EV availability in Minnesota is illogical.

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Closed Mar 15, 2021 · Discussion · 448 Participants · 1 Topics · 615 Answers · 152 Replies · 377 Votes

Brian Bergeron · Citizen · (Postal Code: unknown) · Feb 19, 2021 9:15 am
👍 0 Votes

Regarding OAH docket number 71-9003-36416

Dear Administrative Law Judge Jessica Palmer-Denig,

I fully support the advancement of new clean car standards as proposed in the Minnesota Pollution Control Agency's Proposed Permanent Rules Relating to Clean Cars 7023.0150.

According to the MPCA, transportation is the largest source of climate-changing pollution in Minnesota.

We need to be doing more in Minnesota, indeed the nation, to reduce greenhouse gas emissions as well as mitigating the climate warming effects of these gases.

Adopting these new rules would be an important step in achieving these goals.

Sincerely,

Brian Bergeron
Hermantown, MN

Jan Baune · Citizen · (Postal Code: unknown) · Feb 19, 2021 1:40 pm
👍 3 Votes

I oppose the proposed rule 36416. We are not California. I believe this rule focuses on metro Minnesota and does not consider Greater Minnesota's population, clean air and our needs. This proposal should be discussed in the legislature to consider all ramifications and the effects on all Minnesota people, businesses, costs and availability.

Response:

Scot Adams · Citizen · (Postal Code: unknown) · Feb 22, 2021 5:35 pm
What effect on Greater MN are you worried about? The electric vehicles will probably mostly go to the metro area, or wherever the demand is. Even if the rule is adopted, why would a car company send a car where it's not wanted? The problem is that, right now, people who *do* want to buy electric are prevented from doing so, because MN gives no credit for EVs sold here. We need to fix that.

Lois Bjorlie · Citizen · (Postal Code: unknown) · Feb 19, 2021 3:16 pm
👍 0 Votes

I strongly support this rule implementation. It is a fair and equitable way to begin changing the greenhouse gas emissions that affect our entire state.

Vicki Smith · Citizen · (Postal Code: unknown) · Feb 19, 2021 5:04 pm
👍 0 Votes

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I strongly support Clean Cars MN. We are not now on track to meet the GHG reduction goals established by the legislature in 2007; transportation is our largest source of these emissions. This rule would increase access to more models of EVs in Minnesota, which would reduce GHG emissions, save money for families through lower maintenance and fuel costs, and improve health outcomes for all Minnesotans, especially those who live near busy highways and who have suffered disproportionately from transportation pollution.

Lyle Dahlin · Citizen · (Postal Code: unknown) · Feb 19, 2021 8:55 pm

👍 3 Votes

I strongly OPPOSE Clean Cars MN. Nobody saves any money by forcing a major change like this through. Our cars today, with modern catalytic converters, are much more advanced and cleaner burning than years before. I don't see this as the major advantage that green party supporters would like everyone to believe. Low income people cannot afford a new car, nor should they have to. The same for students learning to drive and forcing parents to buy new electric cars for them as well. I see this as a burden on Minnesotans. Those that feel that strongly about the laws in California are more than welcome to go out there and see for themselves how "good" everything is there. People are LEAVING CALIFORNIA IN RECORD NUMBERS TO OTHER STATES that are less taxing and dictatorial to their residents. I can see this turning out to be a major factor that could start the exodus of residents from Minnesota.

Response:

Scot Adams · Citizen · (Postal Code: unknown) · Feb 22, 2021 9:27 pm

I am old enough to remember the angst over catalytic converter requirements, with people telling me that it was the end of freedom in the United States. So it's with some amusement that I read a comment like this.

Clean Cars MN does not require anyone to buy electric. It requires some dealerships to make electric cars available, enforced by requirements on the car companies. Why should people in MN be told that they are not allowed to buy electric cars? What makes us worse than the ZEV states?

It's simply because we haven't passed this rule that puts us on an equal footing with, e.g., Colorado, or Maine, or Vermont, or Oregon.

Response:

Scot Adams · Citizen · (Postal Code: unknown) · Feb 22, 2021 9:37 pm

Lyle put a response, and I somehow accidentally caused it to be deleted. I apologize. He expressed that a co-worker of his was able to buy electric, and that the ZEV states I mentioned are as bad as California in telling their residents what to do.

The ZEV requirements went into effect in 2018. I was lucky to buy electric before that happened, and, if your co-worker bought at that time, it was easier.

My wording was too strong: It's possible to buy electric in MN, but it's been very difficult since 2018, unless you want to get a Tesla. From the experience of friends, I can say that, to get a new Honda Clarity plug-in or a new Chrysler Pacifica plug-in is a significant challenge in MN. The reason is that auto makers send their plug-ins to ZEV

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states to get credits. So Minnesotans do literally fly to other states to get the EVs that they want.

I'm conservative enough that I also feel negative about government telling us what to do, but there **have** to be exceptions. We can't allow people to simply dump motor oil down the sewer and, analogously, I should not be allowed to treat the atmosphere as an open sewer into which I can dump as much CO₂ as I want. The long term problems caused by this lax approach to carbon pollution are going to burden our children and grandchildren enormously.

Nick Swanson · Citizen · (Postal Code: unknown) · Feb 20, 2021 12:32 pm

👍 0 Votes

I strongly support Clean Cars MN. It is clear that availability of PHEV and EV vehicles is far lower than it should be, especially outside of the metro area. We are at an inflection point where numerous manufacturers are releasing vehicles in the coming years that are designed to meet customer demand such as GM's Hummer line; Ford with the Mach-E and F-150; and pickup trucks, vans, and SUVs from the likes of Workhorse, Rivian, and Lordstown. Without action on Minnesota's part, these sought after vehicles will be destined for states where rules and/or legislation incentivizes or requires electrification. While I don't believe that this proposal goes far enough to address the climate crisis we are facing, it is a step in the right direction and worth supporting.

Spencer Schaber · Citizen · (Postal Code: unknown) · Feb 20, 2021 5:56 pm

👍 0 Votes

I strongly support the proposed Clean Cars MN rule. Contrary to some comments above, electric vehicles **are** less greenhouse gas intensive per mile than current gasoline-powered vehicles over their lifetimes. True, they do incur higher greenhouse gas emissions when produced, but over their lifetimes, the emissions (CO₂e per mile) are lower. See Figure 3 of <https://www.sciencedirect.com/science/article/abs/pii/S1361920919310466> (you can get a full text article with the full resolution figure at <https://escholarship.org/content/qt6j87b5vj/qt6j87b5vj.pdf>, also attached here). It shows that even a high performance SUV (Tesla Model X P100D, which has All Wheel Drive and accelerates faster than almost any other vehicle on the road, 0-60 in 3.1 seconds), and even with today's US average grid GHG intensity, emits around 320 g CO₂e per mile. If the grid power in MN becomes as clean as that in CA, you would be emitting 200 g CO₂e per mile over the lifetime of the vehicle (again, including the extra emissions required to produce the batteries). In contrast, an SUV with an internal combustion engine emits about 500 g CO₂e per mile over its lifetime. Moving from a typical hybrid electric vehicle to a performance sedan (based on Tesla Model S P100D, also a ridiculously nice and fast vehicle) gives a slight GHG reduction per mile over the lifetime of the vehicle with today's US average grid. As our grid gets cleaner, that will yield a bigger reduction in lifetime GHG emissions. If you go with something more economical like a Nissan Leaf or a Chevy Bolt, you would emit around 230 g CO₂e/mile with today's US average grid or 110 to 130 g CO₂e/mile if/when the grid becomes as clean as CA's.

And yes, more vehicle charging stations would be a great addition, but let's get this approved and add that next.

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Bob Guggenberger · Citizen · (Postal Code: unknown) · Feb 21, 2021 12:32 pm

👍 2 Votes

I strongly oppose the proposed Permanent Rules Relating to Clean Cars 7023.0150 - 7023.0300 for many reasons beginning with the implementation process. When did Minnesota cease being a democracy? It is time for our Governor to give up his emergency powers and return legislative duties back to our elected representatives. We certainly do not want to be legislated by another state. If we are looking to another state for some good ideas, at least choose one that is growing.

Edger Fox · Citizen · (Postal Code: unknown) · Feb 21, 2021 12:41 pm

👍 1 Votes

I do not support this proposed rule. Does driving an electric car sound good? yes. I would get one myself if they perform as well or better than my current vehicle for the same price. but they don't as far as i am aware. the open market should determine what is produced based on demand. The government should not dictate what that product is. government should work with manufactures to convince them that producing a certain type of vehicle would be a good idea. initially this rule looks like it will decrease the amount of new vehicles that will be sold as well as raise the price. any proposed changes should be adopted by government first. you deal with changing out your vehicles and see how it woks(busses snow plows etc.). build charging stations, build up demand for manufactures to produce these vehicle. Then let it trickle down to the public once all the up front costs and bugs are worked out. all these "green" laws are very much like a bait and switch. they sell them as "eco friendly" etc.. but fail to give clear data and facts of what it will end up costing you vs what the net benefit will be. only in government does this work (research how Paris Climate Accord really functions it will piss you right off.). try doing this at your job when you want to make a change. your boss will ask for a break down of cost/time/benefit before making a decision. then a follow up meeting will be scheduled to discuss the effectiveness of the change down the road to see if it is working the way you said it would.

Mark Sanstead · Citizen · (Postal Code: unknown) · Feb 21, 2021 2:01 pm

👍 1 Votes

Feeling compelled to personally act with the climate change crisis, I researched electric cars and started shopping. I was surprised and disappointed that Minnesota dealers offered only about half the models compared to states having adopted CA standards. I ended up purchasing a Chevy Bolt and enrolling in the Xcel Energy program to charge at night with a second meter.

I fully support the proposed rules adopting vehicle greenhouse gas emissions standards —Clean Cars Minnesota, Minnesota Rules, chapter 7023; Revisor's ID Number 04626. OAH Docket No. 71-9003-36416. I believe Minnesota must take immediate action to meet the goals established in the 2007 Next Generation Energy Act. This rule change is a commonsense and critical step toward meeting our own clean air standards.. In addition, the rule should increase electric vehicle options for Minnesotans. We must take action now to protect our health and environment.

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Jared Madsen · Citizen · (Postal Code: unknown) · Feb 22, 2021 8:24 am

👍 2 Votes

I am writing in regards to Doc. No. 71-9003-36416. I am strongly OPPOSED to this rule change. For one I feel if this is going to get voted on our legislators should be voting on it and for two what works in one part of the country does not mean it is going to work in another part, let alone what works in one part of the state does not mean it is going to work in another part of the same state.

Katie Izzo · Citizen · (Postal Code: unknown) · Feb 22, 2021 12:49 pm

👍 0 Votes

Please see attached file for the MPCA's preliminary response to comments submitted through 02/12/21. This document will also be placed on the MPCA's Clean Cars Minnesota rulemaking page at <https://www.pca.state.mn.us/air/clean-cars-mn-rulemaking> as soon as possible.

Kahla Gleason · Citizen · (Postal Code: unknown) · Feb 22, 2021 12:55 pm

👍 0 Votes

I am interested in obtaining an electric car and believe the clean car rule will make them more available in Minnesota.

Doug Seaton · Citizen · (Postal Code: unknown) · Feb 22, 2021 3:10 pm

👍 0 Votes

Upper Midwest Law Center
8421 Wayzata Boulevard, Suite 105
Golden Valley, MN 55426
(612) 428-7000
www.umwlc.org

February 22, 2021

Via E-filing
The Honorable Judge Jessica Palmer-Denig
Office of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, MN 55164-0620

Re: In the Matter of Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards-
Clean Cars Minnesota, Minnesota Rules, chapter 7023; Revisor's ID Number 04626
OAH Docket No. 71-9003-36416

Dear Judge Palmer-Denig:

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Center of the American Experiment (CAE) opposes the adoption of the proposed Clean Cars Minnesota rules because they are illegal and bad for Minnesotans. CAE, through its attorneys at the Upper Midwest Law Center, attaches here a letter brief which demonstrates that the rulemaking is illegal under Minnesota and federal law. Before the end of the initial comment period, CAE will provide additional comments from Mr. Isaac Orr of CAE, which will demonstrate the harm these proposed rules will cause Minnesotans. CAE urges the Administrative Law Judge to prohibit the adoption of the proposed rules.

Respectfully,
Douglas Seaton, Esq., President of UMLC
Attorney for Center of the American Experiment

Attachment

cc: James V.F. Dickey, Esq. (UMLC)
Isaac Orr (CAE)

Response:

Bill Kaemmerer · Citizen · (Postal Code: unknown) · Mar 02, 2021 6:39 pm

In item Roman numeral I. of the attachment, the claim that the proposed Clean Car Rule violates Federal Law is based on the notion that offering early action credits within 5 days after the publication of the rule while the authority of the California waiver has not been restored (allowing the rule to be effective) constitutes an illegal enforcement mechanism. This confuses a "carrot" with a "stick." Offering a credit that might not be redeemable in the future (if the California waiver is not restored, and thus the Rule would not go into effect) is hardly a coercive enforcement mechanism by any reasonable understanding of "enforcement." I am often offered coupons for credits or savings for which I ultimately do not reap the benefits, but that does not mean that the provision of such coupons to me by a retailer has constituted an effort at coercive enforcement of my behavior.

In item Roman numeral II. of the attachment, the Rule is mischaracterized as forcing auto dealers to sell certain vehicles and otherwise regulate what cars auto dealers may sell in Minnesota. This is clearly not the case, since the rule pertains only to fleet-wide averages and/or percentages of sales. Thus, the claim that the rule should not be adopted because of insufficient state statutory authority "to regulate what new motor vehicles may be sold in Minnesota" is based on a propping up a "straw man" only to then knock it down.

Martha Wittrock · Citizen · (Postal Code: unknown) · Feb 22, 2021 3:56 pm

 0 Votes

I'm a Minnesota EV owner and I support Clean Cars Minnesota. I have driven my electric car for 5 years and over 40,000 miles.

First I will speak to the Need for and Reasonableness of the rules:

I support Clean Cars because I think we need to enable consumer choice and make sure Minnesotans are not left behind in the availability of EVs (electric vehicles) from car manufacturers. When my husband and I started looking for our first EV back in 2016, we had a difficult time finding something that we liked. We weren't satisfied with the

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current EV selection in MN and found ourselves wanting a VW eGolf which was only sold in states with ZEV rules. We almost purchased and shipped in a new eGolf from a California dealer which would have cost thousands more dollars from shipping costs, and would have put our dollars in the pockets of a CA dealership instead of a MN dealer. Luckily, we found a dealer in MN who sold used eGolfs that they bought and shipped in from CA, and fortunately they had one that we were happy with. Fast forward to now, my husband and I are currently in the market again for a new EV to replace our second car which is gas. Again we are struggling to find a vehicle that meets our needs. Currently the qty of EVs we have available in MN that meet the criteria of what we are looking for is half of what is available in other parts of the country. So we are currently waiting and crossing our fingers that something becomes available in MN by the time our current car bites the dust, and we are forced to purchase out of state. My coworker has a Kia Niro EV which would fit our needs but he shipped it in from upstate NY. He loves it and I'd be interested in one but they just aren't available here and I don't want to hassle with an out of state purchase if I can avoid it - nor should we have to. If MN was the first Midwest state to enact ZEV rules such as what is proposed in Clean Cars MN, not only would Minnesotans have the same choices that others in the US have, but we'd also be the first state in the area with those choices and availability. Just think of how many cars our dealerships will sell to our neighbors in surrounding states who don't have those choices.

Also, to touch on the health benefits of EVs in general, I am writing this on Feb 22, 2021. There was an air quality alert this past weekend for SE and South Central MN, including the metro. Picture all the gas cars seen idling in the winter to warm up and keep passengers warm. EVs have zero tailpipe emissions. I don't need to elaborate further - the rest speaks for itself on that topic!

Finally, to comment quickly on other two key issues that arise regarding the Agency's Authority and Compliance. The MPCA was established by the MN Legislature to give the MPCA the authority to control pollution problems in the state. Its mission is to "Protect and improve the environment and human health." It is a known fact that transportation, including private passenger cars and trucks, is MN's #1 source of greenhouse gas emissions. Tailpipe emissions are a major source of pollution, and the MPCA is well within their authority to put rules in place that aim to reduce this pollution and protect and improve human health.

Thank you!
Martha

Scot Adams · Citizen · (Postal Code: unknown) · Feb 22, 2021 5:24 pm

 0 Votes

I support the Clean Cars Initiative.

Why should people living in MN be unable to go to a dealer and purchase an electric vehicle, if that's what they want? What makes Maine or Colorado or Washington so much more important than Minnesota? I was lucky, in that I purchased a plug-in before 2018, when the Clean Cars availability requirements went into effect. Since then the availability of EVs has plummeted in our state (except for Tesla), and it's simply because other states will give credit for EV availability at dealerships, and ours will not. This can be fixed at the stroke of a pen, following this review.

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I would also like to speak against a statement from Ellen Wald at the hearing earlier today (Monday 22 February). Electric vehicles are emphatically NOT powered by coal. The only way to get to such an assertion is to assume that all electricity comes from coal-fired power plants, and this is not true.

Response:

Terry Carlson · Citizen · (Postal Code: unknown) · Mar 13, 2021 9:09 pm

"Why should people living in MN be unable to go to a dealer and purchase an electric vehicle, if that's what they want"? That's a big "IF." IF Minnesotans wanted EVs, then they would have them in abundance. There are absolutely no restrictions on buying EVs. Plus, there is not a dealership in the world that wouldn't have them on hand if someone -- anyone -- would want one. It's Economics 101, Scot -- good old supply and demand. If there is no demand, one could hardly expect a dealership to tie up its money by displaying a lot full of EVs. The few they have tried to sell just sat in showrooms until, after several months, an equitable dealer trade could finally be made -- no easy feat. There isn't a dealership in the world that will turn away a sale, EV or otherwise. Minnesotans don't want them -- and they especially don't want their tax money to prop them up, either.

Scott Ickes · Citizen · (Postal Code: unknown) · Feb 22, 2021 8:59 pm

👍 0 Votes

My car is a 2006 hybrid. My next MN car will be 100% electric. In order to increase the ease with which I will make this purchase, I totally support this rule change. I also support this rule change as it will help MN meet its ethical obligations to protect our climate for future generations, including my own children.

Sara Benzkofer · Citizen · (Postal Code: unknown) · Feb 23, 2021 7:30 am

👍 0 Votes

Attached is a letter of support from the Como Community Council in Saint Paul, MN.

Marlin Fay · Citizen · (Postal Code: unknown) · Feb 23, 2021 9:50 am

👍 1 Votes

To The Honorable Judge Palmer - Denig, I would like to comment specifically on the Need and Reasonableness of the Clean Cars Rule. A lot of things were talked about in the presentation by MPCA in relation to air pollution, greenhouse gases and carbon footprint. One of them was that we wouldn't have to follow "California rules". In section 5 (c) it says this:

C. Section 177 requires that states adopt standards identical to those adopted by California
Section 177 allows states to adopt the 209(b) standards only if "such standards are identical to the California standards for which a waiver has been granted for such model year." The standards—LEV and ZEV—that the MPCA here proposes to adopt are identical to the California standards. Manufacturers

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
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would be required to meet the same certification and fleet emission standards in Minnesota as they do in California and the other section 177 states under LEV. Likewise, manufacturers would be subject to the same ZEV targets in Minnesota as they are subject to in California and the other section 177 states. Then in section 6 (i) it talks about reasonableness of the amendments. It says they are reasonable because they are readily available to people online. The part they don't highlight is that we DO have to follow future California rules if we want to keep using their standards. 6 (i) The MPCA is proposing to adopt the LEV and ZEV standards "as amended." Incorporation "as amended" means that any future amendments to the incorporated California regulations automatically become part of Minnesota rules. The other issue I have is the "NEED" portion of the rule. I agree with lowering emissions and cleaner air and electric vehicles. We are being led to believe that we need this rule to get manufacturers to deliver more LEV and EV vehicles to Minnesota so consumers have more choice in LEV or EV models. Right now, manufacturers are ramping up production of these models. By 2035 General Motors plans to be all electric vehicles. We don't NEED to put this rule in to effect to get more electrical vehicles to Minnesota. As stated by the rulemakers, these rules won't take effect for a couple years, maybe not until 2025. By then more electric vehicles will be available, we can work on the electrical grid infrastructure that is needed, and we can do it with ALL Minnesotans working together. What I don't want is to live in Minnesota and live under California rules, and as I pointed out above, that is what is in the rules. Sincerely, Marlin Fay Grand Meadow Mn

Response:


Marcus Luniewski · Citizen · (Postal Code: unknown) · Mar 08, 2021 8:50 pm
Marlin. I too have the same suspicion but you did the work in quoting the California rules. I did ask this question to the MPCA of if in the future California would make changes would Minnesota be forced to follow? they did say no. but your kind of states otherwise. I would like to know more.

Julie Sanstead · Citizen · (Postal Code: unknown) · Feb 23, 2021 1:45 pm

 0 Votes

I fully support the proposed rules adopting vehicle greenhouse gas emissions standards —Clean Cars Minnesota, Minnesota Rules, chapter 7023; Revisor's ID Number 04626. OAH Docket No. 71-9003-36416. This is a commonsense and much needed step toward a cleaner future for all Minnesotans. It allows for more electric vehicle options for consumers, protects our communities from excessive air pollution, helps reduce greenhouse gases that cause global warming, and does not put any burdens or restrictions on regular Minnesotans who currently own or want to buy gas powered cars or trucks. Thank you!

Nathan Moe · Citizen · (Postal Code: unknown) · Feb 23, 2021 2:32 pm

 0 Votes

My name is Nathan Moe, I'm a Minnesota EV owner and I support Clean Cars Minnesota. - Electric cars are better vehicles and we should do everything we can to offer everyone in Minnesota an opportunity to choose an EV. Right now, the EV availability is poor at

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dealers and limits your choices to just a few select vehicles. Many of which are premium cars which are inaccessible to many Minnesotans.

- EVs don't produce tailpipe emissions, so increasing EV adoption improves the air quality, especially in areas where vehicle traffic produces a lot of pollution. The pollution created to provide electricity is more efficient than each individual car producing energy by burning fossil fuels.

- EVs also use much less energy than ICE cars so the overall emissions are considerably lower, and they improve our trade balance since we don't need to import so much oil.

- Since EVs consume less energy, they are much cheaper to drive, and EVs have considerably lower maintenance costs so they are also much cheaper to own.

- Used EVs are the most affordable cars to own.

- In 2020, the average EV sold in Minnesota had over 250 miles of range, and when we have more choices everyone can find one that works for them. EVs are quieter and provide better performance, leading to a better driving experience.

- Safety is important to me and IIHS test results clearly show that EVs are very safe.

- Home charging is the most convenient and affordable way to power driving. Public charging is valuable service, but I don't use public charging very often, so the current public charging infrastructure works well for me. I also feel that confident that we will have more public charging infrastructure available in the future.

- EVs reduce our dependency on imported oil so we can keep our dollars in Minnesota and don't need to inhale the emissions caused by refining oil and burning gas.

- Electric utilities are moving away from coal and adding clean renewable electricity production. EVs gets cleaner every day. I am able to get all of my electricity from renewable sources today.

- Auto manufacturers are bringing dozens of new EV models to the US market before 2024, and I want to make sure that Minnesotans have access to all these options.

- Used EVs are the most affordable cars to own and drive. Even though Clean Cars Minnesota rules apply only to new vehicle sales, this also has an impact on the number of more affordable used EVs, since we first have to get the new EVs to build a healthy used EV market.

I would like to see Minnesota be a leader in addressing climate change and will continue to vote for people who will further that mission.

Michael Huber · Citizen · (Postal Code: unknown) · Feb 23, 2021 4:09 pm

 0 Votes

My name is Michael Huber, my wife and I are Minnesota EV owners and we support Clean Cars Minnesota.

We have driven electric cars for 4 years and over 40,000 miles.

We purchased our cars in Oregon while we lived out there and brought them back with us when we moved back to Minnesota in July 2019. We have a 2014 Nissan LEAF and a 2018 Honda Clarity plug in hybrid. We have heard from others that they would like to purchase a Clarity, but they are not available in Minnesota.

We have met people who have had their electric cars shipped across the country to Minnesota because they are not available here.

More electric car options are coming out every year and I would like to have more electric car options to purchase. Dealerships on the border will get more business as

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Wisconsin car shoppers will come to Minnesota to purchase EV cars. We would love to see more electric charging station options within Minnesota as well, although we primarily do our charging at home.

Some of the things we love about driving electric cars are charging our cars overnight and not having gas fumes polluting our garage when we start the car in the morning. We can preheat the car before leaving on cold days.

We contribute to having cleaner air because we have zero emissions and unlike gas cars, our cars will keep getting cleaner as the electric grid relies more on renewable energy sources.

I feel better when in rush hour traffic, because I am not wasting gas and polluting the air, my fuel efficiency actually increases.

Electric cars are superior to gas cars in almost every area, they are a smooth, quiet ride, fun to drive, less expensive to maintain (no more oil changes), better safety features than traditional internal combustion engine (ICE) cars.

Please support clean cars Minnesota and give Minnesotans the opportunity to discover the joys and benefits of driving electric.

Winston Cavert · Citizen · (Postal Code: unknown) · Feb 23, 2021 5:15 pm

👍 0 Votes

I vigorously support this rule. There is untapped demand for fuel-efficient and electric vehicles in this state -- dealers that fail to move toward that will miss out. Dealerships that begin to feature these cars will see demand increase in their areas. In attempting to purchase an EV last year, I found the selection of cars and dealerships carrying them was very limited -- that inhibits demand. If all dealerships are uniformly required to carry EVs for sale, consumers will perceive the broader selection and consider the viability -- that will drive market demand upwards, which is what is needed for our future, to mitigate the worst effects of climate change and emitted air pollution-induced ill-health for future generations of our state, our country, and our world. EVs are now a fully functional option for almost all automobile owners in Minnesota and, as technology and manufacturing commitments advance, these cars are positioned to become even more so over the next few years -- the proposed MPCA rule will provide an accelerating nudge.

Christopher Waits · Citizen · (Postal Code: unknown) · Feb 23, 2021 6:01 pm

👍 1 Votes

My comments pertain to the need for and reasonableness of the rules.

I fully support the proposed rules adopting vehicle greenhouse gas emissions standards —Clean Cars Minnesota, Minnesota Rules, chapter 7023; Revisor's ID Number 04626. OAH Docket No. 71-9003-36416.

I support it because it does not put any burdens or restrictions on regular Minnesotans who currently own or want to buy gas powered cars or trucks. This is a much needed step toward a cleaner future for all Minnesotans. It incentivizes dealers to make more electric vehicles options available in the state and helps reduce air pollution so we can enjoy camping, fishing, skiing and hunting in our state.

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Electric vehicles work great in this state. I have owned an electric vehicle here in Minnesota for over 4 years, and my all-wheel drive electric vehicle routinely gets me to my shift-work job through the cold and snow before the plows are out when many of my coworkers can't make it in or they can't find a place to plug in their diesel block heaters in our -30F nightshifts. I believe in a free-market society, but dealerships and auto manufacturers have proven that they will maintain the status quo unless incentivized to change. We need to provide a clear incentive for dealers to become educated and to educate the public when shopping for a new car, for the good of the state and my children.

One of my favorite things about owning an electric vehicle is that as time goes by, my car gets cleaner as the energy sources for the grid move to cleaner sources. This point is essential for why we need to act now to make it easier for Minnesotans to have access to electric vehicles for a cleaner Minnesota in the future.

Minnesota is rich in our natural resources and our love of the outdoors, we should also be leaders in this environmental initiative to keep our state beautiful for generations to come.

Response:

Marcus Luniewski · Citizen · (Postal Code: unknown) · Mar 08, 2021 8:42 pm

I would disagree with your statement

"it does not put any burdens or restrictions on regular Minnesotans who currently own or want to buy gas powered cars or trucks"

both sides of this argument agree that his rule will increase the cost of normal vehicles in the state by \$1,000-\$2,500. The MPCA estimates are the lower number and the Minnesota Auto Dealers are around the upper number.

Sean Gosiewski · Citizen · (Postal Code: unknown) · Feb 23, 2021 6:16 pm

👍 0 Votes

February 23, 2021

To The Honorable Judge Palmer-Denig, Doc. No. 71-9003-36416. Via E-filing

RE: Resilient Cities and Communities statement supporting MPCA's Legal Authority and the need for and reasonableness of Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards- Clean Cars Minnesota, Minnesota Rules, chapter 7023; Revisor's ID Number 04626 OAH Docket No. 71-9003-36416

Dear Judge Palmer-Denig:

Resilient Cities and Communities supports a growing network of leaders from 40 Minnesota cities working together to equitably achieve their climate goals on time (www.rccmn.co)

Need and Reasonableness

Transportation is now the largest emitter of GHGs in Minnesota. To reduce our emissions, the MnDOT 2019 Pathways Report In 2019, showed that action will be needed across many areas of transportation including:

- Improving vehicle efficiency standards - reducing emissions from gasoline and diesel vehicles,
- Fuel switching - transitioning to electricity and biofuels as vehicle energy sources, and

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- Reducing vehicle miles traveled.

The Pathways Report (www.dot.state.mn.us/sustainability/pathways.html) and updated listed adopting the LEV and ZEV standards as a recommended next step in addressing GHG emissions from vehicles. The Governor's Climate Subcabinet Transportation Action Team also recommends establishing consumer rebates for electric vehicles (www.dot.state.mn.us/sustainability/docs/tat-policy-theme-descriptions.pdf.)

Air Emissions from Vehicles Impact Communities of Color - Vehicle emissions, specifically fine particulate pollution - caused 2,000 to 4,000 premature deaths in MN in a recent year. Air emissions are disproportionately impacting communities of color who often live adjacent to high volume roads.

Many Minnesota Cities have adopted city wide climate goals and are depending on the State of MN to adopt rules to accelerate vehicle efficiency improvements and the adoption of electric vehicles to meet their city GHG reduction goals related to transportation. Over the past four years through our Resilient Cities workshops 40 metro cities (and four cities in greater MN) accessed resources to include climate mitigation, resilience and energy goals in their new 2040 Comprehensive Plans.

During our conversations with 30 metro cities in 1/22/20 (West Metro) and 2/13/20 (East Metro) <http://rccmn.co/county-clusters/> 100 local leader including city staff, city council members and environmental commissioners discussed high impact ordinances they would like to work together to implement to meet their city's energy and resilience goals for energy, buildings, and transportation.

MN Cities are working to expand E.V. charging infrastructure to be prepared for expanded E.V. adoption. Many of the cities we are working with are adding electric vehicles to their city fleets, installing public E.V. charging stations and adopting ordinances to require new developments to include E.V. charging spots.

Minnesotans deserve greater access to electric vehicle choices - including the coming models of E.V. sedans, cross overs, SUVs and trucks to save money on transportation and vehicle maintenance. E.V.s will soon achieve price parity with the upfront purchase price with traditional vehicles and have much lower life time fuel and maintenance costs. Our Minnesota electricity GRID will be strengthened and improved as electric vehicles become more prevalent. The costs of maintaining and updating our electric grid will be able to be spread out across electricity sales for homes and businesses and transportation.

Resilient Cities and Communities concurs that the MPCA has the legal authority in Minnesota law to address vehicle fuel efficiency standards and to address air quality. Section 177 of the Federal Clean Air Act enables states to choose between adopting national standards or CA vehicle fuel efficiency standards. The MPCA has fulfilled the administrative rulemaking steps needed to adopt the California LEV and ZEV standards. Resilient Cities and Communities concurs with the need and reasonableness of the MPCA adopting California's LEV and ZEV clean cars rules for Minnesota the MPCA to

- provide Minnesota residents with wider choice and increased access to purchase E.V.s
- reduce air pollution health impacts in communities of color, and
- help MN Cities to reduce GHG emissions from transportation by increasing E.V. adoption.

Sustainably,

Sean Gosiewski, Program Director, 612 250-0389 sean@rccmn.co
Resilient Cities and Communities,
2801 21st Ave S. Suite 100,
Minneapolis, MN 55407 www.rccmn.co

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Background

Over the past four years through our Resilient Cities Workshops and our statewide workshops for City Environmental Commissions 40+ metro cities and cities in greater MN (including Duluth, Faribault, Northfield, Rochester) accessed resources to include climate mitigation, resilience and energy goals in their new 2040 Comprehensive Plans. See a the list of participating cities at www.rccmn.co/county-clusters/

Patrice Tetta · Citizen · (Postal Code: unknown) · Feb 24, 2021 6:37 am

👍 0 Votes

Electrifying cars and trucks is a step that is long overdue and while it's only one step on the path to dealing with climate change, it's an important one. Transportation is the largest contributor to greenhouse gas emissions and a major cause of smog-forming pollutants (we had a poor air quality alert in the Twin Cities just days ago). The issue is also one of environmental justice, as pollution from vehicle emissions harms lungs and hearts especially when breathed in regularly, disproportionately harming communities of color who are most likely to live in proximity to freeways and major arterial roadways.

Although fossil-fuel vehicles have become somewhat more fuel efficient and less polluting, people are buying larger cars and -- pre-COVID -- driving more because of the low cost of gasoline. At the same time, Minnesotans lack options when they want to purchase electric vehicles. Less than half of the vehicles currently on the market and available to others in the country are offered for sale here in Minnesota, limiting the choices for those who want to make environmentally-responsible car-buying choices. The proposed clean car standards would benefit Minnesota because such standards would not only reduce greenhouse gas emissions but also provide customers with more vehicle buying choices.

The proposed new standards would to reduce greenhouse gases and other polluting emissions from passenger vehicles by reducing tailpipe emissions from new, primarily gasoline-powered or "internal combustion engine" (ICE) cars and light-duty trucks; and by increasing the number of electric vehicles (EVs) for sale.

With the crisis of climate change become more evident with every climate-driven disaster, and the undisputed impact of pollution on people's health, we need to hit the brakes on fossil fuels and move toward a cleaner, healthier, and more sustainable future.

Rita Chamblin · Citizen · (Postal Code: unknown) · Feb 24, 2021 10:28 am

👍 1 Votes

I listened to the MPCA presentation on Monday. Thank you for a thorough and understandable review of these rules. I'm glad to have learned the details so I can respond more confidently to those who would fear monger about this.

I live 11 miles northeast of Bemidji and would like an EV for trips into town. Contrary to what my state rep says, many of us in the north country are excited about having an EV for one of our vehicles. Yes, indeed, my neighbors use pick-up trucks to haul boats, ice houses, snowmobiles, etc. And, we use our Subaru to carry our kayaks. But, we all have a second vehicle. My neighbors all have small sedans for taking kids to school and for

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one of the parents to go to work. That's a prime EV market and doesn't require that we give up our trucks and SUVs while waiting for auto manufacturers to bring EV trucks and SUVs into wider use.

I might be able to afford a used EV (I was looking at a Nissan Leaf), and the closest place to find one is in the Twin Cities. I called last week and learned that I'd have to buy it sight unseen, as they sell quickly. Then, when we were trying to figure out how to even get it here, learned that I'd have to have it brought in on a flat bed, which was going to add \$300 to the cost. That's because the infrastructure isn't built out for the earlier EVs with less range, even though an EV with less range works for me in this setting. All of this is a barrier to entry for some of us. A more robust EV market will both bring in new dealers and provide a bigger used EV market. Maybe one of the dealers would even be a bit closer to me, for example in St. Cloud or Duluth.

And, with these new rules, we'll have more EV choices, as auto manufacturers add us to the states with priority for new releases. That helps the market grow, too, benefiting both new and used car buyers.

As more EVs are sold, more infrastructure will be built. And as we build out the infrastructure to encourage EVs, we can better welcome visitors and support summer residents who are EV owners.

I was surprised by the long time period allowed for auto manufacturers to meet the targets. I suppose that was necessary to get buy-in, but certainly takes the wind out of those who claim that this is such a dramatic change.

Others have spoken more eloquently about the climate change and justice impacts. We need to act on those issues in all the ways we can, and this is one way.

Let's do this!


Ellen Wald · Citizen · (Postal Code: unknown) · Feb 24, 2021 4:35 pm

 1 Votes

Please see my attached letter which addresses the reasonableness of the proposed regulation, specifically the section related to Zero Emission Vehicles. The proposed rule is not in the best interest of the state of Minnesota or Minnesotans. Adopting the California zero emission vehicle (ZEV) mandate would be a mistake for Minnesota. It would adopt California's ZEV standards without consideration for the differences between consumer needs in Minnesota and in California. California may have taken the Lakers, but Los Angeles is a hot desert, and Sacramento does not understand or consider the needs of the people of the Land of 10,000 Lakes.

See attached.

Glenn Marston · Citizen · (Postal Code: unknown) · Feb 24, 2021 4:54 pm

 0 Votes

I support Clean Cars Minnesota because rules to enable more choice of EVs across Minnesota are necessary because the defacto rules and incentives that make fossil fuel vehicles the defacto standard for transportation over the last century will be forever at

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odds with the change that needs to be made to move transportation and all other energy consumption to some form renewables. We can either continue deny the world is changing around us, or we can embrace a future where energy is plentiful and does not cause the environmental damage fossil fuels create. We can either be proactive or reactive and I applaud Governor Waltz choosing to make us choose our future and not allow the future be the similar to Texas.

My household has two EVs (Bolt EVs) and one PHEV (Pacifica E-Hybrid) and we subscribe to Xcel energy time of day plan and the Windsource plan. Purchasing these vehicles was a challenge because I had to purposefully ask to see them and explain how they work to the salesperson and how its the best choice for my family.

I have been asked many times when I plugging in at public charger how they have never seen a vehicle that could be plugged in and how amazed a vehicle can run on a battery. This is why we need this rule, the incentives should be set to encourage EV adoption as a society and discourage fossil fuel vehicles. Why wouldn't you want to have a future where Minnesotans are "free" from the energy markets? With electricity you can gather you own energy or stay on the grid. Staying with fossil fuels you are forever beholden to the fossil fuel industry. In Minnesota, we don't have petroleum in the ground, but we have lots of wind and solar, let's use that and make our state stronger for future generations.

Diane Horsager · Citizen · (Postal Code: unknown) · Feb 25, 2021 9:56 am

👍 0 Votes

I fully support the Clean Cars Minnesota initiative. Clean, renewable energy is the future. Yes, it will preserve clean air and clean water, but it also makes economic sense. These are the vehicles of the future, and Minnesota could be a leader. Freedom of choice also applies to people who would like to purchase EVs but currently are limited in the choices available to them at dealerships. Please pass this bill for the good of our state.

Dennis Brech · Citizen · (Postal Code: unknown) · Feb 25, 2021 5:25 pm

👍 2 Votes

The Clean Cars initiative that Gov Walz is proposing is very expensive and unnecessary. I lived in California for 12 years and know what California is about with their pollution. Yes, it is bad but there are reasons for it that are not the same for Minnesota. California doesn't have the winds we do. Yes, they have the Santa Anna winds which clear the smog out occasionally, but generally all the winds do is back the smog up against the mountains. We don't have mountains to stop any smog we may have. The regulations and costs to the motorists were oppressive. Now to get electric cars there is still pollution involved. It takes fuel of some kind to recharge them, be it coal, etc. The people who live along the state lines of Minnesota will resort to the neighboring states to get their products which is going to cause many businesses in those stateline towns to close down due to loss of business. The farmers are going to be highly impacted with equipment that is inadequate to do the job. It costs just as much to produce an electric car and what to do about the spent batteries which also fail on a regular schedule. I was talking to a senator this last Saturday and asked him what the legislature can do about overriding Walz's rule-making process. He said that there really wasn't anything he could do, but that the people need to contact

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MPCA and let them know what they think. The people still have a say so, but what we really need is the process of initiatives that we can get on the ballots for the people to be able to speak up with a vote.

Sincerely

Jerry Thomasson · Citizen · (Postal Code: unknown) · Feb 26, 2021 1:59 pm

👍 2 Votes

I totally disagree with the MPCA proposal to force electric vehicles on Minnesota citizens. It's strong arm tactics like this that has bankrupted California. We do not need to copy their stupidity. The free market place will drive demand if and when it's practical. Mandates such as this will also bankrupt small car dealerships across the state who won't be able to afford the necessary changes to support the new mandates. I frequently travel to northern Minnesota (500 miles round trip) which is well beyond the range of any current electric vehicle. It's not acceptable. Hey MPCA, why stop at mandating electric vehicles with no supporting infra structure, let's mandate hydrogen vehicles too! Wake up and let the market place drive common sense demand.

Elizabeth Goodney · Citizen · (Postal Code: unknown) · Feb 27, 2021 3:42 pm

👍 0 Votes

I strongly support the Low Emissions and Zero Emissions standards and support the full implementation of both. I live in Minneapolis and I am planning to buy an electric vehicle when my current car dies and this rule will help ensure I can access them without having to travel out of state. As a mother of a seven year old, I want our planet to be as healthy as possible as far as possible into the future, and moving quickly away from emitting green house gasses is necessary to stave off the worst of climate disaster. Air pollution caused by vehicles is the United States biggest single contributor to global warming, and this rule change will help Minnesotans do our part to transition away from reliance on fossil fuel burning vehicles. I am interested to see my neighbors concerns about rural Minnesota and hope the MPCA takes those into account when implementing this rule, to ensure rural needs and concerns as well as those of folks in the metro are met.

Gail Loverud · Citizen · (Postal Code: unknown) · Feb 27, 2021 7:21 pm

👍 0 Votes

I'm asking the MPCA to adopt the clean car standard with early action only. I want my next car to be an EV. I have been fighting against the fossil fuel industry for 4 years, especially the Enbridge Line3. I understand the 70% of or GHG emissions are from cars/ lite trucks. I read in the Star Tribune Sunday, Feb 21,2021, that our north central Minnesota Lakes are becoming murkier from the worst kind of algae bloom, the blue green toxic algae. This algae is because our lakes are becoming too warm as is our climate. Our fish can't live in water like this nor would you want to swim in this so there goes our tourism industry, who wants to come here to fish for dead fish or swim is such water. Dr. Michael E. Mann, a distinguished professor of Atmospheric Science at Penn State says we now have many zero carbon alternatives to fossil fuels that are cost competitive. Those that still believe we need fossil fuels need to open their eyes and look at our rapidly changing climate and the cost of record breaking weather events. Paul Douglas a senior meteorologist at TPT and the Star Tribune has been trailing weather-related events since 1990s. There have been 4 separate 1000 year floods since

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2000 and 14 mega rains since 1858 and 7 since 2002. Minnesota now has the growing season of Wichita, Kansas. If we don't turn this around, Texas will have to learn how to endure Minnesota-type winters and Minnesota will have to learn how to endure Texas-type summers. I did a quick survey and called 6 dealerships in the Twin Cities asking how many electric vehicles they had on their lot, out of the 6, most had 0, one had 1 and one had 14. The car I have researched and that I want I can't get here, I would have to go to Washington State or California. When I finally am able to get an EV and plug it into my 120 volt outlet, my electric will be run by all wind power as I have Connexus energy for my electric company. Our climate is an existential threat, we all know it and we must deal with it now.

Kevin Tholen · Citizen · (Postal Code: unknown) · Feb 28, 2021 1:21 pm

👍 0 Votes

OAH docket # 71-9003-36415
The Honorable Jessica Palmer-Denig:

I fully support the Clean Car Rule proposed by the MPCA that will enable consumer choice in MN, reduce greenhouse gases and toxic tailpipe emissions.

I have owned a Tesla Model 3 for 2 ½ years. I bought the model with 300 miles range and AWD. My longer trips take me from Lake Elmo, MN to Marshall, in southwestern MN where I am able to choose between 2 locations to recharge. Even when it is approaching 0 degrees, if I stay at the Sleep Inn I use their Level 2 charger and it takes about 8 hours to recharge from near 0 miles back up to 300 miles. If I use the DC fast charger installed from a grant by the MPCA near Tall Grass Liquors and Pizza Ranch it takes about 2 hours to charge and I typically head over to the Pizza Ranch for a slow, casual meal while I wait. In either case these businesses are getting a revenue stream that they would otherwise not have from me.

My mother-in-law was in the market for a Subaru Crosstrek Hybrid PHEV but they are not available in MN. She ended up buying a Nissan Leaf, not her vehicle of choice. She is fine with the range because she no longer drives very far at one time and simply uses 110 power in her garage to recharge. When Subaru makes their PHEV available in MN she may consider a trade.

My wife has range anxiety and was interested in a PHEV which would switch over to gasoline if the battery was depleted. We wanted a Toyota RAV4 Prime PHEV but were told there is a 2-year waiting list. If we want one sooner we should fly out to CA, buy it there and drive it home.

Neither of these outcomes for PHEVs available in MN seem reasonable and these auto manufacturers don't seem to be allowing free market choices for MN consumers.

In addition to expanding choice for MN the clean cars rule will help reduce the threat posed by climate change and its escalating hidden costs to MN consumers. MN has an over 70% increase in extreme storms from 2009-2019, driving up insurance premiums as companies struggle to keep up with increased claims. This crisis seems to be in slow motion to the non-scientist but to those who study climate it is happening at breakneck speed. It is not uncommon for stakeholders to deny or otherwise minimize science if it causes them to invest or change behavior. This is just human nature.
<https://www.tpt.org/the-cost-of-climate-change-in-minnesota/>

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There are also negative health effects of tailpipe emissions that do not seem to get much attention. Both gasoline and diesel represent a mixture of hydrocarbons that when burned in an ICE emit a cocktail of gases, some of which are toxic and even carcinogenic which include:

<https://www.theaa.com/driving-advice/fuels-environment/emissions>

CO₂ (greenhouse gas)

CO (carbon monoxide, an odorless and colorless gas that can cause headaches and respiratory problems)

NO_x (nitrogen oxides) that are oxidized in the atmosphere and contribute to acid rain and can cause inflammation of the airways, reduced lung function and trigger asthma

SO₂ (sulfur dioxide), sulfur occurs naturally in the crude oil from which petrol and diesel are refined. It forms acids on combustion leading to acid rain and engine corrosion. It also contributes to the formation of ozone and of particulate matter.

HCs (Hydrocarbons) are emitted from vehicle exhausts as unburnt fuel and also through evaporation from the fuel tank, from the nozzle when you fill up and also at stages through the fuel supply chain. They react with NO_x in sunlight to produce photochemical oxidants (including ozone), which cause breathing problems and increased symptoms in those with asthma.

Benzene is emitted from vehicle exhausts as unburnt fuel and also through evaporation from the fuel system although modern fuel systems are sealed and have carbon canisters to hold the vapors. Benzene is toxic and carcinogenic and long-term exposure has been linked with leukemia.

Particulate matter or soot - particulate matter is partly burned fuel associated mainly with diesel engines and is also formed by the reaction between other pollutants. Smaller particles can pass deep into your lungs causing respiratory complaints and contributing to the risk of developing cardiovascular diseases. Modern diesel cars are fitted with Diesel Particulate Filters (DPF) to stop these particles passing into the atmosphere.

<https://www.epa.gov/mobile-source-pollution/research-health-effects-exposure-risk-mobile-source-pollution#:~:text=Motor%20vehicle%20emissions%20contribute%20to,and%20for%20immune%20system%20damage.>

Motor vehicle emissions contribute to ambient levels of air toxics known or suspected as human or animal carcinogens. Exposures to air toxics can also cause noncancerous health effects, such as neurological, cardiovascular, respiratory, reproductive and/or immune system damage.

These represent some of the reasons why our family is migrating to EVs and PHEVs. There are additional efforts to provide incentives and build out the EV charging infrastructure as well as a grant program to alleviate costs to dealerships for employee training and equipment. This proposal is at the MN legislature sponsored by Representative Zach Stephenson. If passed it will help eliminate some of the objections to moving from ICE vehicles to clean cars.

With all of this in mind, our family has taken a lot of personal actions to reduce our carbon footprint. In addition to my electric car and my wife's pending purchase of a PHEV when they become available in MN, we have geothermal heating and cooling (we have not used any natural gas for heating in our house for over 10 years) and we have installed solar panels on our roof. Although we still have an energy deficit for our house we use Windsource from Xcel Energy meaning that our electricity is theoretically 100% from wind energy.

For these reasons we find that the clean cars rule proposed by the MPCA is not only

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necessary but very reasonable. We wish it went further to enhance the speed at which clean cars are adopted in MN but it is a great first step.

Colin Watkins · Citizen · (Postal Code: unknown) · Mar 01, 2021 10:58 am

👍 0 Votes

I strongly support the Clean Car Rule proposed by the MPCA.

I have been using an EV (VW eGolf) as my daily driver for going on three years. I have seen first-hand the benefits of electric vehicles:

- * No tailpipe emissions
- * Lower fuel cost (I don't even use any of Xcel's incentive programs for electric vehicles, just pay market rate for the electricity. If I decided to install a second meter or change plans I could get it for half the cost but have opted not to)
- * Minimal maintenance -- no oil changes, fewer wear parts
- * Year-round performance has met expectations

I'm sure many who have not owned electric vehicles (and perhaps some who do) will push back on the last point and say that batteries don't work in Minnesota winters. That would be a false statement. An informed consumer will be able to make the decision as to whether an electric vehicle will work for them in the winter. The fact is that electric vehicles will have a reduced range in the winter, especially if you use the heater. However my commute is 20 miles round-trip, so even in the worst case scenario of -20 degrees and full blast heater, I can still make two full round-trips in my EV. All it takes is a little bit of forethought. I will agree with the other commenters that this rule change should be implemented along with additional rules/incentives to improve the buildout of electric vehicle infrastructure, but the fact remains that this car has been ideal for me even only being able to charge it at home.

Just because electric vehicles aren't perfect for 100% of use cases is an asinine argument against increasing availability of electric vehicles for the general public!

From a societal standpoint, we need to be doing everything we can to curb emissions. I have seen a lot of comments saying "What about the emissions from power plants that charge the batteries." Using MN/Xcel energy as an example, they have been steadily reducing the carbon footprint of their grid. So switching to an electric car means over time my net emissions are going down EVEN IF I didn't subscribe to the renewable programs that Xcel offers. In addition, EVEN IF my car is powered 100% by a gas plant, the efficiency of the plant/efficiency of the electric drivetrain even with distribution loss is greater than the efficiency of an ICE vehicle. And the electric vehicle removes tailpipe emissions from cities/residential areas. There's a significant public health benefit.

Catherine Lexau · Citizen · (Postal Code: unknown) · Mar 01, 2021 12:07 pm

👍 0 Votes

I support the Clean Cars Minnesota initiative promoting the use of electric vehicles (EVs) through the Permanent Rules Relating to Clean Cars now under consideration for the following reasons:

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We need to adopt electric vehicles (EVs) because they reduce overall carbon emissions. We need to reduce this important source of carbon emissions to slow/limit the extent of climate change that has been caused by human sources. EVs can be powered by renewable energy. The problem of climate change can only be meaningfully impacted by large-scale emission reduction and it is an appropriate role of government to ensure these reductions.

Automobile manufacturers will only expand their investments in EV technology and produce more of these models if demand increases. Waiting for public demand and dealer marketing to expand the number of EVs available for purchase is not working fast enough in Minnesota. My husband and I have shopped for EVs and except for prohibitively expensive cars, models that we'd like to purchase are just not available here in the Twin Cities metro. It is incredibly disappointing to see that these models are so much more available in states like California. There, supply had been supported by the government initiative upon which this proposed Minnesota rule is modeled. We also prefer to buy used cars, and the supply of used EVs will be even further delayed until after the supply of new EVs is increases.

While it's certain that a major expansion in charging infrastructure is also needed to help support EV adoption, this rule does not exclude the possibility of government support for this expansion, either through direct support or incentivizing business support. It only makes common sense that wider adoption of EVs will influence further public and private investment in charging infrastructure. Likewise, it's highly unlikely that those investments will be made if the number of EVs on the road don't increase. Even now we don't think that the relatively limited options for public charging would be a barrier for our family's purchase of an EV because we would charge it at home almost exclusively.

Finally, I don't believe that this rule poses an undue burden on citizens, small businesses or automobile dealers. There are ample exceptions built into the rule, such as exclusion of off-road vehicles, heavy-duty equipment and farm vehicles. The waiting period built into this rule will give Minnesota auto dealers ample time to prepare for this reasonable regulatory requirement. I am personally hopeful that if the rule is passed that dealers might start carrying more of these vehicles in anticipation of its implementation.


Thank you for the opportunity to submit these comments for consideration by the court.

Simon Townsend · Citizen · (Postal Code: unknown) · Mar 01, 2021 6:41 pm

 0 Votes

I support the Clean Car Rule proposed by the MPCA.

Kurt Schultz · Citizen · (Postal Code: unknown) · Mar 01, 2021 8:57 pm

 0 Votes

I support the proposed Clean Cars Minnesota standard because we, as Minnesotans and as residents of planet earth, are facing a climate crisis. A crisis that can only be averted through a societal transformation and rapid implementation of ambitious greenhouse

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gas reduction measures. Understanding this urgency, the State of Minnesota and cities throughout Minnesota have set aggressive greenhouse gas emissions reduction goals. Measures, such as the Clean Cars Minnesota standard and countless other public initiatives and personal measures may make it possible to achieve those goals and prevent the next generations from experiencing the most devastating impacts of climate change.

Michael Bearfoot · Citizen · (Postal Code: unknown) · Mar 02, 2021 11:17 am

👍 0 Votes

I support the proposed Clean Cars Minnesota standard. I leased electric cars to try them out and found that I really enjoy electric cars and all their many benefits. Including but not limited to: lack of maintenance cost, improving the neighborhood air quality(a lot of children in my neighborhood have asthma), decreasing reliance on fossil fuels that is literally destroying our planet, and being a hoot to drive. So I decided to purchase a new vehicle in 2020 and in my price range I had exactly three options. Two of which I had to throw out right away because of personal reasons (Not enough room for me, the driver, and not enough range). So I had one choice to buy electric. Now granted, I technically had three, but had this rule been in effect, I would have had eight vehicles to choose from. This not only would ensure that I keep driving electric which is in the best interest of ALL Minnesotans, but it would ensure that as a consumer, I have the most amount of choice.

Bill Watkins · Citizen · (Postal Code: unknown) · Mar 02, 2021 3:41 pm

👍 1 Votes

I strongly support this rule change. I purchased my first plug in vehicle in December 2012 - A 2013 Chevy Volt. At the time I had a very difficult time finding a Minnesota dealer with the inventory, or even the desire, to sell me the car. Upon calling several dealers, few had any Volts in stock and those that did had only one or two units. I was able to test drive one and decided to purchase, but due to their low stock, the dealers could not find the options or color I was looking for in Minnesota. In addition, their pricing could not compete with out of state dealers who had significant stock and sales volume. In the end I purchased my Volt from a dealer in California that had the color and options I wanted and at a price that saved money - even after paying to have the car trailered to Minnesota.

Three years later in 2016, when getting my Volt serviced at a dealership, I approached a group of salespeople and asked if they had any new Volts that I could take a look at. I was told they had one back in the back of their lot at which point they resumed their conversation. This was several years ago and I'm still amazed that I asked a group of salespeople about a new car and no one was interested in even showing it to me. My experiences purchasing in 2012 and again shopping for an EV in Minnesota in 2016 gave me the impression that the dealers I spoke to had no incentive to sell electric vehicles even when presented with a motivated customer. If a dealership does not have cars for people to see and test then you'll never drive demand - especially for something like this that is a change to how people have done things their whole life. Instead, you will only get customers like me, who through independent research, already knew exactly what they wanted and went above and beyond to purchase that car. An average consumer, who visits a dealer to find a new car, would likely never have known the Volt I purchased existed.

We have since replaced both of our cars with long range electric vehicles (no gas

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backup) and do not envision ever purchasing another gasoline vehicle. Owning that Volt, even with its small electric range and backup gas engine, showed me that an EV can easily work in Minnesota. Now, with advances in the last decade, not only can EVs work but they provide a far better ownership experience than a traditional gas car. I've not pumped gas in the winter, climbed into a very cold or hot car, or needed an oil change in the last several years. Instead, I charge in my garage, wake up with a full "tank" every day, can warm or cool my car in the garage before I leave, and I don't need to take my EV in for multiple maintenances per year. The lack of options on the dealer's lot or any incentive for dealers to sell EVs in Minnesota is preventing other families from having our wonderful experience. It is holding consumers back from a better ownership experience and its holding Minnesota in a past of inconvenient, higher cost of ownership combustion vehicles.

Marion Pelton · Citizen · (Postal Code: unknown) · Mar 02, 2021 7:49 pm

👍 0 Votes

I support the rule change for these reasons:

1. Climate change is already affecting us and auto exhaust emissions are a significant part of this problem.
2. I want my children, grandchildren, and great grandchildren to be able to live in a clean world with clean air and water.
3. I have a lung condition (bronchiectasis) and air pollution negatively affects my ability to be active outdoors.

Thank you

Michael Overend · Citizen · (Postal Code: unknown) · Mar 02, 2021 8:12 pm

👍 2 Votes

Dear Administrative Law Judge Palmer-Denig,

We appreciate your efforts to best serve the people of Minnesota in your pending ruling on the Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards—Clean Cars Minnesota. I am strongly in favor of the adoption of the Clean Cars Minnesota Rules by the MPCA. This proposal is a simple, but critically beneficial step to help move Minnesota toward reducing the excessive Greenhouse Gas Emissions from our transportation sector. These Greenhouse Gas Emissions are costing all of our citizens dramatically in terms of our health, our economy and our environment. There is no valid argument against this policy. Thank you for carefully weighing the facts, not just the opinions expressed, with regard to the benefits of adoption of this policy. Based on the facts we hope that you will rule in favor of the policy in order to give our children, and many generations to come, a better, cleaner and healthier future.

For your reference, I have attached a two page Climate Change Facts document that highlights the need for our society to embrace urgent action, like the adoption of this important Clean Cars Minnesota policy, in order to address global warming as rapidly as possible.

Respectfully,

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Michael Overend, DVM
557 Scenic Drive
Two Harbors, MN 55616

Michael Overend · Citizen · (Postal Code: unknown) · Mar 02, 2021 8:48 pm

👍 0 Votes

My apologies, the file I wished to attach should be below.

Mike Overend

Rachel Belvedere · Citizen · (Postal Code: unknown) · Mar 02, 2021 9:33 pm

👍 0 Votes

Dear Administrative Law Judge Palmer-Denig,
I wholeheartedly support the Minnesota Pollution Control Agency's intent to adopt the Clean Car MN Standards - both the Low Emission and Zero Emission vehicle standards - and join the growing list of states taking the lead on reducing greenhouse gas emissions. Adopting this rule is essential if the MPCA is to uphold its commitment to protecting the health of Minnesota residents and the environment. As the largest source of greenhouse gases in the state, vehicles represent a significant opportunity for our state to reduce its contribution to climate change; implementing this rule and requiring manufacturers to produce more ZEV and LEV options is estimated to reduce greenhouse gas emissions by 8.4 million tons in the first 10 years. This reduction and other emission reduction measures are imperative if Minnesota is to do its part in preventing climate change's most severe consequences. Additionally, taking steps to electrify our state's transportation system presents massive health benefits by reducing air pollution; not only does this improve the health of all Minnesotans, but it especially benefits the health of communities of color that are disproportionately harmed by air pollution due to a history of racist housing and urban planning practices. Reducing greenhouse gas emissions is imperative to pursuing health and justice for Minnesotans and adopting the Clean Car MN Standards is one step in the right direction in realizing this necessity. I urge the MPCA to adopt the Clean Cars MN standards.

Sincerely,
Rachel Belvedere

Beth Kallestad · Citizen · (Postal Code: unknown) · Mar 03, 2021 11:44 am

👍 1 Votes

On behalf of the City of Northfield I am submitting a Resolution of support for this rulemaking which was adopted at the March 2, 2021 City Council meeting and is also supported by our Environmental Quality Commission.

Daniel Thornby · Citizen · (Postal Code: unknown) · Mar 03, 2021 12:41 pm

👍 0 Votes

As a business owner in the state of Minnesota, I appreciate my opportunity to comment

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on important legislation like Clean Cars MN. I support the adoption of the proposal. I see the benefit that lowering vehicle emissions from petroleum based vehicles will have both environmentally and economically. A common way Manufacturers comply with lower emissions standards is by increasing fuel efficiency and that puts money back in the pockets of Minnesotans while reducing harmful greenhouse gas emissions. I also see the demand for increasing EV sales in Minnesota and I believe we should meet that demand for consumers (UCS, 2019). I understand that this will not force anyone to give up their current petroleum vehicles and that it will not force anyone to buy an EV. A recent study projects EV charging emissions to decline significantly as renewable energy continues to become more economic and is further adopted by electric utilities (Knobloch et al., 2020). This is an important step in battling climate change. I also see the benefit to the health of Minnesotans through reduction of air pollution which the MPCA has shown to cause thousands of deaths in Minnesota (MPCA, 2019). I hope Minnesota will join the 14 other states that have adopted clean car standards and become a model for other midwestern states to follow.

Thank you for your time,

Daniel Thornby


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Knobloch et al., 2020. <https://dx.doi.org/10.1038%2Fs41893-020-0488-7>

MPCA, 2019. <https://www.pca.state.mn.us/sites/default/files/aq1-64.pdf>

Brian Peterson · Citizen · (Postal Code: unknown) · Mar 03, 2021 12:59 pm

 2 Votes

Dear Administrative Law Judge Palmer-Denig:

I oppose the proposed "clean car" standards for the following reasons: 1) It is not needed in Minnesota- our air is clean and Minnesota is not experiencing global warming. 2) It will drive up the cost of all cars by mandating unwanted ZEV onto car dealerships who must pass the cost on to us peasants. 3) The expense of ZEV is much higher than its counterparts-- us poor and middle class peasants cannot afford these ZEVs. 4) ZEV is a misnomer because the charging of these massive batteries requires massive electrical production which is not reliable with solar and windmills in the foreseeable future. 5) Minnesota cold temperatures definitely shorten the lifespan of ZEV batteries versus warmer states. Old dead batteries will be an environmental liability. 6) There are already lots of ZEV choices for MN consumers--- allow the the free market to choose what cars we peasants buy. We peasants will certainly try to circumvent any new expensive mandates imposed. 7) Agriculture and trucking cannot sustain economic feasibility if MN continues down the path of mandated battery-run machinery. I appeal for you to defend the financial health of Minnesota's lower and middle class who simply cannot afford these expensive mandates in these challenging economic times. Minnesota is green and clean already- lets keep it that way with automobile choice!

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Michael Wallace · Citizen · (Postal Code: unknown) · Mar 03, 2021 1:04 pm

👍 0 Votes

I strongly support this legislation. We are already on the tipping point of irreversible climate change and need this legislation enacted as soon as possible.

Mary Caskey · Citizen · (Postal Code: unknown) · Mar 04, 2021 8:50 am

👍 1 Votes

I am writing today to tell you that I oppose adopting the California omissions standards for the state of Minnesota.

For many years I traveled to California for business, and each time I went, I was impressed by how different that state was from Minnesota.

California - Palm trees and tropical ferns line their highways

Minnesota - Birch and pine trees line our highways

California - Hot sun and waves of heat bounce off the buildings and concrete

Minnesota -Freezing temperatures and severe winters

California - Dense, fast traffic that winds through the cities and state on 8 to 12 lanes

Minnesota - Two to four lanes of traffic, unless you are in Minneapolis

California - Their car dealerships feature lots filled with status options like Mercedes-Benz, Porsche, BMW, Jaguar, Audi, Alfa Romeo, Tesla, Rolls-Royce, and Lincoln to name a few. The lots are predominately loaded with cars, not a pickup in sight.

Minnesota - Because of our state's severe winters and passion for outdoor sports, our dealerships are loaded with SUV's and pickup trucks and more mid-line, dependable brands like Honda, Toyota, Ford, Dodge, Jeep, Subaru, and Chevy.

What does someone from California carry in their car? A sun shield to put on their dash so they can touch the steering wheel.

What does someone from Minnesota carry in their car? Jumper cables, shovel, scrapers for our windshields, sand or cat litter to help with traction. We have to have winter tires to get around in the winters. We have to have sturdy batteries that will start our cars in the subzero temperatures.

I understand why California needs strict omissions laws; the population density and the serious lack of adequate public transportation forces people to drive everywhere. They live with constant air quality warnings...this is not the situation in which we find ourselves. Yes, our environment is very important to us, and yes, we treasure our lakes and parks, but adopting the same omissions standards as California doesn't make sense for our lifestyles in the northern climate. How will these laws affect the workings of our cars in our climate? How can we think about passing this law without the state that surround us doing the same thing?

In conclusion, please do not pass this law. It doesn't support our needs in Minnesota; it supports the needs of the people living in a very different situation in California.

Thank you,

Bruce Anderson · Citizen · (Postal Code: unknown) · Mar 04, 2021 10:56 am

👍 1 Votes

I serve as the chair of the City of Northfield's Environmental Quality Commission. The EQC passed a resolution of support on February 17th for the proposed Clean Cars Minnesota rule, and urged the Northfield City Council to pass a resolution of support as

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well. The City Council passed such a resolution on March 2nd. I've attached the EQC resolution. The City Council resolution of support will be added as a comment separately by the City of Northfield staff liaison for the EQC, Beth Kallestad.

Bruce Anderson · Citizen · (Postal Code: unknown) · Mar 04, 2021 10:58 am

👍 0 Votes

I personally strongly support the proposed Clean Cars Minnesota rule. The transition away from fossil fuels in all sectors of our economy needs to happen as rapidly as possible. This is one modest step in the right direction that will make it easier for Minnesota consumers to make the right choice and purchase an electric vehicle that meets their needs.

Deb Whalen · Citizen · (Postal Code: unknown) · Mar 05, 2021 6:56 am

👍 2 Votes

My name is Deb Whalen, and I am here today representing the Minnesota Agri-Women. Thank you for taking the time to consider the concerns of Minnesota's rural residents.

Unfortunately, so many decisions in our state capital and major cities are made without adequate consideration of the likely impacts of such policies on the state's rural residents. The zero-emission vehicle mandate under consideration is yet another example. Our state's decision to consider a one-size-fits-all vehicle mandate needlessly diverts scarce state resources away from rural communities.

Few of our state's residents care as deeply about the environment as our rural residents, as many of us have made our livings off the land through agriculture. Others simply prefer the peaceful tranquility that living closer to nature provides. But the decision to live a more remote lifestyle comes with a cost. Most rural residents must travel farther for basic needs, such as education, health care services and groceries. Banking, voting, and most forms of entertainment are not just around the corner for us - it can often require a drive of an hour or more. This issue is particularly problematic for Minnesota given the hours long far distances that Minnesota residents are forced to drive from various parts of the state to get to work or for other requirements. The cold winter weather our state experiences annually renders the electric vehicle conditions pretty much unfeasible. Bad weather, including flash floods, high winds, and snow make these journeys more difficult or impossible.

The range of electric vehicles make these challenges even greater. Extreme temperatures, which we often experience, can further limit the range of an EV. According to data from AAA, cold temperatures can reduce EV battery range by as much as 40 percent and hot temperatures by as much as 17 percent. For an EV with an above-average battery capable of traveling 200 miles, that would reduce that vehicle's fully charged range to 120 miles and 166 miles, respectively. Rural residents need safe, reliable transportation to get their work done and protect their families from harm. The thought of cold weather sapping battery life and stranding individuals on the side of a state or county road is enough to give most rural residents pause. Poor cell service in rural areas could mean having to wait hours for help to arrive.

And speaking of safe and reliable transportation, rural roads are often the last to receive necessary repairs. According to the transportation research group TRIP, 36 percent of all

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rural U.S. roads are in poor or mediocre condition. We all pay for road maintenance through the federal gas tax, yet EVs are not paying their fair share: because EVs do not use gas or pay the gas tax, they don't contribute to road and bridge maintenance. That's simply not right.

It is not our place to say whether electric vehicles make more sense in an urban environment. But what we can say is that mandating the sale of EVs statewide has impacts on all state residents, few of them positive. Attempting to force automakers to produce certain types of vehicles for consumers who do not want them is likely to only increase the retail purchase costs for all other vehicle types so that manufacturers can attempt to recoup any losses. That means a rural driver who buys a new Chevy Silverado is paying more than they should to subsidize the purchase of a Chevy Bolt in the city. That Bolt driver should be free to buy whatever car they choose, but they should pay market value.

All rural residents of Minnesota are looking for is a fair and level playing field. Few residents care more for the quality of our air, land, and water than the families that make up our rural counties. And we applaud the governor and Minnesota Pollution Control Agency for trying to find ways to improve the environmental quality of our state. But ultimately, the zero-emission vehicle mandate does little to accomplish environmental gains while adversely impacting our state's rural residents.

Regards,

Deb Whalen
Oklee, MN 56742

Chris Saffert · Citizen · (Postal Code: unknown) · Mar 06, 2021 11:50 am

 1 Votes

I strongly support Minnesota Clean Cars.

Our family in Bloomington has over 150,000 miles on our only vehicle and will be looking to buy an EV within the next few years. When we get to that point, we hope to have a better experience than the frustrations described by so many other commenters. And the option to buy an EV should be easily available throughout the state and not just in the Twin Cities.

It's undeniable that the climate crisis has been imposing tremendous costs -- from increased wildfires, flooding, and hurricanes to warming seas and melting ice caps that threaten coastal areas and islands, topped by the fact that the greenhouse gases being released now will trap more heat and intensify future effects. In response, the Biden Administration has wisely restored setting a true social cost of carbon that federal agencies should use in their rulemaking to consider the impact of pollution on climate change (<https://arstechnica.com/science/2021/03/biden-administration-puts-a-price-on-carbon/>).

The same principle of the social cost of carbon should apply here. Generally speaking, few businesses privatize their profits while externalizing their social costs as much as auto dealerships. In addition to many dealerships and their trade organizations trying to

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block EV sales to continue pushing sales of gas-powered vehicles with their much higher and deadly emissions (<https://www.cbsnews.com/news/fossil-fuel-air-pollution-emissions-1-in-5-deaths-worldwide-each-year/>), most of them heavily promote the sales of SUVs and trucks with designs that are increasingly dangerous for people out walking and bicycling (<https://www.iihs.org/news/detail/new-study-suggests-todays-suvs-are-more-lethal-to-pedestrians-than-cars>).

Ensuring that EVs are readily available to Minnesota residents is an important step for our state to take in moving to a safer, healthier carbon-free economy. Minnesota has led on many important environmental initiatives in our history and should use MN Clean Cars to catch up to the more than a dozen other states leading the way on making the transition to fresher air and fewer of our children dying from asthma -- I can't find the news posting about a student who died from asthma at my daughter's old school, but here's another sad story about the effects of our vehicle emissions and other pollution: <https://www.startribune.com/anytrea-baker-upbeat-lunch-lady-in-minneapolis-schools-dies-at-45/600012990/>.

Separately, I find it disrespectful and offensive how some posters are repeatedly suggesting that supporters of the rule should move to another state. Such comments have nothing to do with the rule and should be taken down or result in the comment being disregarded by MPCA.

Thanks for your consideration, Chris Saffert, Bloomington, MN

Melissa Wenzel · Citizen · (Postal Code: unknown) · Mar 07, 2021 12:02 pm

 0 Votes

After listening to 7 hours of the public testimony, I would like to share my thoughts in support of the rulemaking:

1. We currently have limitations on which cars on the market we can buy, at least locally. Minnesotans want more EV choices! (this will also allow for a flood of good quality used EVs to be available).
2. Not everyone wants to or will be buying an EV. But everyone benefits from cleaner air when those who want to, buy an EV.
3. I had leukemia 14 years ago, when I was 28. While I'll never know how it was caused, I did live near freeways or busy highways most of my early adult years. Auto exhaust (particularly diesel exhaust) contains benzene and benzene is one of the main causes of leukemia. I never want anyone to go through what I went through. And yes, our household owns 1 used short-range EV and an electric-assist bike. And an electric lawn mower and an electric snow blower, from the money we saved by not having a 2nd car.
4. One of the public testimonials included a statement that with increased in the opportunity to use renewable energy (Xcel offering wind energy, people having solar panels or belonging to a solar community system), one's own electric car electric use is locally generated and increasingly cleaner.
5. When we drive or I bike with our EVs, I feel good knowing I'm not contributing to the problem, but am part of the solution. Our neighborhood has had a HUGE increase of families with young kids in the neighborhood in the last 3 years, and my choices today will impact their entire lives. I hope to try to make choices that support a healthier neighborhood and planet.

Thank you for any thoughtful responses to this post and for having this comment be a part of the formal rulemaking record.

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Respectfully,
Melissa Wenzel, Saint Paul, MN

Angela Carlson · Citizen · (Postal Code: unknown) · Mar 07, 2021 12:50 pm

👍 0 Votes

I want to thank the MPCA team for their response to my first question and follow up with a few additional questions/comments:

In response to my initial question, the MPCA team stated that, "Examining the quantity of emissions of greenhouse gases rather than air concentrations is a standard and reasonable approach." I agree that this is a standard approach, but I disagree that it is a reasonable approach. One of the major arguments in the SONAR is that air pollution is causing health problems (Figure 5 in the SONAR) and that the Clean Cars mandate will result in better air quality (specifically lower PM2.5 levels, Figure 15 in the SONAR). The SONAR hypothesizes that reducing CO2 emissions from cars will improve the air quality (Figure 15 in the SONAR). Tracking CO2 emissions will demonstrate whether CO2 emissions from cars were reduced, but the original question remains - was the hypothesis correct that reducing CO2 emissions from cars improves air quality? Given that several other states have been enforcing the Clean Car regulations for many years, we should be able to look and see if their air quality (atmospheric PM2.5 levels, atmospheric CO2 levels, etc.) has improved.

In their response, the MPCA team objected to using air quality improvement in Clean Car states to determine if the Clean Cars regulations are effective, by stating that, "The air concentrations of these pollutants and the link to direct emissions is complex. For example, in addition to vehicle emissions, the localized concentration of air pollutants is influenced by other emission sources, air pollution that migrates from other regions and states, chemical reactions in the atmosphere, and weather." I agree that many different factors affect air quality and that the link between emissions and air concentrations is complex. This is precisely the reason we need to look at air quality/concentrations - to determine if the hypothesis (that reducing CO2 emissions from cars will improve air quality) was correct. If this policy has not produced a measurable effect in other states, I would be skeptical of its effectiveness in MN. To be clear, I am not saying that it has not produced the desired effect in other states, I am simply asking that the MPCA team puts together the graphs/figures and adds them to the SONAR so that we can analyze the effectiveness of the plan in other states.

I want to thank the MPCA team again for their response to my initial question and their effort to analyze many important aspects of the Clean Cars regulations in the SONAR. I would appreciate if they could analyze one more aspect of the plan and provide graphs of the atmospheric PM2.5 levels in Clear Car states over the past ~20 years as a way to help persuade Minnesotans that this is an effective policy.

Kat Rene · Citizen · (Postal Code: unknown) · Mar 07, 2021 5:43 pm

👍 2 Votes

I OPPOSE this rule. And I strongly oppose adopting any rules from California.

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As someone who works and lives near the North Dakota/Minnesota border, it's rules like this that make North Dakota a more desirable place to live. Implementing more rules and regulations like this is only going to cause people to leave Minnesota. This means lost taxes, and finances for Minnesota. Rules like this will only hurt Minnesotans, especially those that are low income and rely on a vehicle for transportation. This will only bring increasing costs, to an already costly part of a person's budget. If we look at the people who are trying to buy a car, we often see the families, that simply want something reliable and affordable as well. These electric cars are luxury items.

With the widespread power outages obvious in Texas due to blizzards, is Minnesota's power grid ready to handle intense demands of more electricity usage from electric cars? Even with adopting more "green" energy technology, how will that ensure that our power grid is reliable? What will be our backup when the green energy sources fail? Government subsidies are steering our energy sources to wind and solar which is misleading and creates an illusion. The reliable sources will always be coal, natural gas, and nuclear. So, if these electric cars will create a greater demand for electricity, where will that be coming from?

What about the air from other states? How can one actually measure air emissions for an entire state when we are bordered by other states, let alone another country? Do people expect our clean air to stay put in state lines or vice versa? These electric cars will just increase electricity demands, and ultimately make us look for more ways to create electricity. And the green electricity we often turn to, is really not that green. Exactly how much land is Minnesota willing to give up for windmill farms? Or for solar panel farms? How can anyone claim that covering pieces of land with metal structures is environmentally friendly? Where is Xcel energy planning to put all their wind mills and Solar panels for their new green deal? Will they be destroying farmland, forests, prairie habitat, the NATURAL environment? Solar panels and windmills have short life expectancies. For example, each wind turbine blade weighs about 27,000 lbs, and over the last 2 years over 30 million pounds of fiberglass and plastic are being buried because of these blades. Thus causing them to be pollution to the environment when they are no longer useful. How can we be so fast to claim that in the long run they are actually better? Has everyone considered what Xcel's energy costs are going to look like in the future?

What about states who HAVE NOT passed laws like this? What's their air quality like? Have we compared our graphs to theirs? Angela Carlson brought this up in her comments, " In their response, the MPCA team objected to using air quality improvement in Clean Car states to determine if the Clean Cars regulations are effective, by stating that, "The air concentrations of these pollutants and the link to direct emissions is complex. For example, in addition to vehicle emissions, the localized concentration of air pollutants is influenced by other emission sources, air pollution that migrates from other regions and states, chemical reactions in the atmosphere, and weather." I agree that many different factors affect air quality and that the link between emissions and air concentrations is complex. This is precisely the reason we need to look at air quality/concentrations - to determine if the hypothesis (that reducing CO2 emissions from cars will improve air quality) was correct. If this policy has not produced a measurable effect in other states, I would be skeptical of its effectiveness in MN. To be clear, I am not saying that it has not produced the desired effect in other states, I am simply asking that the MPCA team puts together the graphs/figures and adds them to the SONAR so that we can analyze the effectiveness of the plan in other states." Thank you, Angela.

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Electric cars will also require batteries that use lithium. Lithium mines are some of the most dangerous and environmentally hazardous mines out there. Currently, South America has some of the most abundant mines for lithium. However lithium mining often requires using fresh water. Many communities in South America have had to give up their fresh water supply in order to make these mines work and meet the demand. How can the MPCA justify this if it's also hurting the environment elsewhere? And lithium mining done in the United States requires the use of chemicals. Chemicals that have been found in water supplies hundreds of miles from the mining location. To reprimand one thing, but to okay another is wrong.

Bypassing legislation sets a dangerous precedent for future concerns on this matter. By bypassing legislation already, you've lost the trust of many Minnesotans to talk through concerns. People have commented how this isn't "that big of a deal" or "you can still buy your gas car" or "you don't have to buy one then". Please stop. This is a rule that's being pushed through the backdoors and you've lost many people's trust. How are people supposed to trust that California will go forward with concerns for MN in their future rules? How are Minnesotans supposed to trust that more won't be added to this rule? We don't have people capable of making rules particular for MN here? This is an unnecessary rule. If people want an electric car, they can already get one. I've known many people in our area who travel across states to buy vehicles, goods and other services because it's worth it to them. But, they don't reprimand others because traveling to get their item cost them time and money.

It's time we start abandoning rules like this, otherwise Minnesota will continue to be a less desirable place to live. Please abandon this rule. And please do NOT adopt any rules from California. Many of us in opposition to this rule are not against clean air, but we are against more rules and mandates that don't actually solve a problem, especially those that originate from California

Joel Troumbly · Citizen · (Postal Code: unknown) · Mar 08, 2021 11:14 am

👍 2 Votes

I absolutely oppose the Minnesota Clean Car rule. This rule will not improve Minnesotan's lives. In fact, it will make them worse for many Minnesotans. This rule will have a huge negative effect on Minnesota's middle, low, and extremely low income earners. As it is now, it is getting very hard to afford a reliable vehicle to get to work. Adding these California rules will make so that owning a vehicle will be impossible for many. When you live in rural Minnesota, a vehicle is a must if you have a job. Let what our fore-fathers dreamt of be the determining factor for electric vehicles. We live in a capitalist nation. If there is a demand for electric vehicles, there will be a supply. Having big brother force them on us is the wrong way to go. In conclusion, vote this harmful rule down. This is Minnesota, not California.

Ellen Biales · Citizen · (Postal Code: unknown) · Mar 08, 2021 12:15 pm

👍 0 Votes

Please see attached comments from the Bloomington Sustainability Commission.

Am Johnson · Citizen · (Postal Code: unknown) · Mar 08, 2021 3:23 pm

👍 1 Votes

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I strongly oppose the Minnesota Clean Cars Rule-making that would remove Minnesota's authority to make standards that are applicable to the needs of Minnesotans and our environment and delegate that authority to California standards for not only the near future but for the long-term. Furthermore, MN emission standards and regulations which highly impact Minnesotans should be decided by the MN House and Senate!

Scott Olson · Citizen · (Postal Code: unknown) · Mar 08, 2021 4:16 pm

 4 Votes

Dear Administrative Law Judge Jessica Palmer-Denig,

I oppose the Minnesota Pollution Control Agency's proposed regulations on vehicle emission standards. I am not opposed to electric vehicles, but I am opposed to laws and regulations that could force these cars on Minnesotans before the state is ready.

These regulations could decrease the availability of cars popular with Minnesotans, while essentially forcing electric vehicles on consumers long before they are practical - or affordable.

I believe strongly that lawmakers should be involved. By going through the administrative rule making process, this administration is circumventing the legislature's input. Neither the mandate nor the method through which your administration is implementing this rule into law are in the best interest of Minnesotans.

I oppose these regulations and urge the state to significantly amend or scrap them all together.

Response:

Marcus Luniewski · Citizen · (Postal Code: unknown) · Mar 08, 2021 8:21 pm
well said

Gillian Innes · Citizen · (Postal Code: unknown) · Mar 08, 2021 6:07 pm

 0 Votes

I support the Clean Cars legislation. Climate change and greenhouse gas emissions are very pressing issues and gasoline-powered vehicles are a huge source of air pollution. The new tailpipe emissions would ensure GHG reduction in the future and improve air quality, especially in communities that are disproportionately impacted by pollution (communities of color, etc.). It would also bring more light- and medium-duty EVs to the state and encourage dealerships to educate themselves on the technology. This rule would not require anyone to get rid of their current cars, so I think it's time to embrace developing technology and take a big step towards cleaning up our air.

Marcus Luniewski · Citizen · (Postal Code: unknown) · Mar 08, 2021 8:19 pm

 2 Votes

I oppose the proposed rule
Eliminate: Subp. 3. Fleet average emissions. A. and all subsequent sections that would

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apply to this. There is no need for language change, just eliminate it.

The government should not dictate the demand of types of vehicles this way. These are private businesses that will be negatively affected by this rule. Thus, passing the extra cost onto the buyer. This will also disproportionately affect the middle and lower class. The rich will be able to afford these changes; the poor will not. Both sides of this argument have agreed on this price increase for LEV's. If the government wishes to influence the increased sales of ZEV's, then they should do things that promote the buyer to purchase them, for example: investing in infrastructure for reliable charging, tax incentives, etc. A private business is in the business of making a profit. They are smart and can figure out on their own if Minnesotan's want these vehicles or not. There is no incentive for Minnesota dealerships to not want to make money. There are plenty of documents out there that prove the demand for ZEV's will dramatically increase on its own through the free market.

Below is a list of issues I have with the proposed rule. There is no section of the rule to reference other than throw out the whole thing. These are based on my opinion from life experience and values.

It looks like none of this rule change applies to: military, emergency vehicles, large commercial vehicles, etc. I agree with that, but it also raises my suspicion of this rule being complicated and cumbersome. It reminds me of when the emission standards would shut off an idling truck automatically after too much idle time. This was applied to emergency vehicles. After production of these types of emission reducing ideas, the exemptions were placed because of the cost and more importantly the unreliability of these systems. Because none of the exempt categories can handle the new complications, this is going to bring to the people that can least afford it. The middle and lower class.

If the lay person actually reads the "California Code of Regulations, title 13....." Its complicated and has "durability" language with graphs of "standard operating periods" that only read 150,000 miles. I don't know what this means, but I do know that the more complicated vehicles get, the more they break. This may not apply to ZEV's, but it does to LEV's. Manufacturing of new products or in this case the need for replacement parts for more complicated systems produces pollution. None of this is included into the total carbon footprint of the life for LEV's. If you don't understand this, tour a foundry that makes auto parts. Using less, keeping something longer, and not having a throw away society will help the environment more than the California Code of Regulations will. They also say this does not apply to used vehicles. Maybe not right now, but it eventually will. Meaning when all these new vehicles become old and sold to second and third owners, they become used vehicles. So, for people who can't afford a new vehicle this is their only option. And being in Minnesota we have salt and rust on our vehicles. Many Minnesotan's purposefully buy out of state "rust free" or rust reduced vehicles to promote the longevity of these their cars. Longevity of a product also reduces pollution. So, when this rule is 10+ years old, will Minnesotan's be able to go and buy a vehicle from a non-compliant California Code of Regulations State and register it in Minnesota? If not, Minnesota cannot afford to buy into these rules when most of the States in the Union do not and are currently not planning on it. It restricts us and isolates us. I only believe this to be true because my 2014 ford focus has an emissions tag on the inside of the hood that reads "does not meet California emission standard and cannot be sold in California." This is a flex fuel gas motor that gets 35 MPG. The Minnesota Pollution Control even stated cars manufactured after 2012 meet this standard. Then how come mine does not?

This rule is also going to affect rural counties of the state more adversely than the metro counties. Infrastructure for ZEV's will always be better in higher populated areas. Even when the state establishes rural infrastructure for these types of vehicles, rural

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Minnesota residents use their vehicles in a completely different manner than metro Minnesotans. Again, don't force all Minnesota dealerships to act in the same manner. Let the demand and the profitability of these types of vehicles to drive the sales. If Minnesota wants to increase sales of ZEV's, tackle it with consumer confidence of batteries and reliable grid systems, tax incentives, and infrastructure investment. People who can afford these ZEV's will buy them. Don't increase the price of the LEV's in the process. People who can barely afford LEV's now will surely struggle more in the future if the Government decides to intervene in the free market.
I want a cleaner world for all. It's just not in these rules that's going to get us there.

Deana Dennis · Citizen · (Postal Code: unknown) · Mar 09, 2021 1:24 pm

 0 Votes

On behalf of the Ceres BICEP (Business for Innovative Climate and Energy Policy) Network - a coalition of nearly 70 major employers and manufacturers across the United States, many of whom have operations and facilities in Minnesota - I share the attached letter expressing support for the adoption of the vehicle emission standards in Minnesota in alignment with the Advanced Clean Cars program ("clean car standards").

Clean car standards are important for the many leading businesses and institutions that have set ambitious goals to reduce their carbon footprint and also seek to realize cost savings. Vehicle fleets are a major component of companies' emissions reduction efforts and represent a significant operating cost. The deployment of low- and zero-emission vehicles is an important means of mitigating climate impact while also creating savings and reducing the financial risks associated with fuel cost and supply volatility. Adoption of the clean car standards will drive the availability and development of new models, unlocking the potential of these advantages and supplying the marketplace with clean, cost-saving vehicles for the benefit of all Minnesotans.


We recommend strengthening the MPCA's draft rule to modify the zero-emission vehicle (ZEV) Credit Bank proposal by removing the credit "one-time allotment" and including only "early action credits." Early action credits incentivize automakers to bring electric vehicles to the market sooner. In contrast, a one-time allotment does not provide such an incentive since automakers benefit regardless of their electrification efforts. In addition, automakers' regulatory burden has already been reduced; the original ZEV Credit Bank proposal was designed in anticipation of CY2023 enforcement, however now the clean cars rule will not go into effect until CY2024. Any additional leniency would only weaken the benefits of clean car standards.

The businesses in our coalition recognize that climate change is a business risk; that the economic benefits of robust clean car standards are significant; and that the transition to clean transportation is valuable for companies' bottom lines and all Minnesotans.

I encourage you to read the full letter of support for the Clean Cars Minnesota proposed rule via the comment attachment. Thank you for your time and consideration.

Sincerely, Deana Dennis

Jamie Long · Citizen · (Postal Code: unknown) · Mar 09, 2021 1:31 pm

 1 Votes

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Please see attached comments from 58 legislators in support of the Clean Cars rule.

Amy Koch · Citizen · (Postal Code: unknown) · Mar 09, 2021 1:38 pm

👍 3 Votes

March 9, 2021

Administrative Law Judge Jessica Palmer-Denig
600 North Robert Street
St. Paul, MN 55101

Re: Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards – Clean Cars
Minnesota, Minnesota Rules, chapter 7023; Revisor’s ID No. 04626

I am writing you in response to the request for comments related to the Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards – Clean Cars.

Throughout my career, sustainable energy has been a personal and professional priority. While serving on the Senate Transportation & Energy Committees, I championed legislation that put Minnesota ahead of the curve on renewable energy. For example, in 2007, I supported legislation to get Minnesota to 25% renewable energy by 2025. I voted to pass the updated Next Generation Energy Act, which required both electric and natural gas utilities to reduce energy sales and spend a minimum percentage of their annual revenues on activities to advance energy efficiency, demand-side management, and renewable energy. Most importantly, we did this through vigorous debate in divided government. Following my time as a legislator, I served as the Chair of the Minnesota Conservative Energy Forum where I continued putting into practice my belief in clean, sustainable energy.

It is my experience working on energy policy that has given me pause regarding the new Clean Cars Minnesota rules that are being proposed. Arbitrarily mandating more electric vehicles on dealer lots in the hope that people purchase them is like putting more broccoli in front of a toddler in hopes that he will eat it. Just because the cars are available will not ensure a corresponding demand amongst Minnesotans. Numbers bear this out. Despite growing momentum toward cleaner cars, less than 1% of vehicles on the nation’s roads are electric. Minnesota dealers currently sell about 2,000 electronic vehicles each year, but under the California standards, dealers would have more than 18,000 electronic vehicles dropped annually onto their lots.

I have always been a firm believer in the market. As a state, we may very well reach a point where it is feasible to have 18,000 electronic vehicles on lots. That shift in demand will come from consumers, not the government. I imagine that there are several reasons why Minnesotans don’t think an electric vehicle is an appropriate fit for their lifestyle. It might be someone like my sister, who has 8 children and is unable to fit their family into a compact car. Perhaps it is someone who has valid concerns about making it through a Minnesota winter without four-wheel drive. Perhaps it is someone who lives in rural Minnesota, where there is no battery charging infrastructure to support these vehicles. These are all valid concerns for Minnesotans.

Ultimately, technology and the market are responding to these concerns. General Motors

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announced its goal of moving to a fleet of all electric vehicles by 2035. General Motors has backed up its goal by investing heavily in electrification, along with Volkswagen and other car manufacturers. There is still much work to be done to lengthen driving ranges, speed up battery charges, and invest in charging infrastructure, but before these technological innovations come forward, electric vehicles will still not be an option for many consumers – especially in a sometimes frigid, rural state like ours.

Finally, I think we should step back and fully evaluate our goals and how we should achieve them. Americans want to live in a world with less pollutants and lower emissions. However, this piecemeal approach by individual states will not have the impact that we hope. First, climate change is a global phenomenon. Car mandates in Minnesota will have an inconsequential impact on worldwide emissions, but they will have a significant economic effect on consumers and workers through increased costs. Moreover, car manufacturers will be able to offset any carbon reductions brought through additional electric vehicle placement in states with mandates by selling more SUVs and trucks in other states, keeping them in compliance with national average vehicle mileage rules, despite the introduction of more electric vehicles. This has shown to be the case as carbon-cutting progress has come to a halt even though electric vehicles are more popular than ever before.

The more effectual approach is to let the market work – allowing consumer demand drive the shift from gas to electric instead of a top-down state mandate that harms our state’s families and businesses.

Sincerely,

Amy Koch
Former Majority Leader, Minnesota Senate & Chair of the Minnesota Conservative Energy Forum

Response:

Bill Kaemmerer · Citizen · (Postal Code: unknown) · Mar 11, 2021 8:23 pm

I applaud General Motors' goal of selling only zero-emission vehicles by 2035, and their investments toward this goal. However, industry's commitment to stated goals can change. It is a reasonable role for government regulations to continue to provide a complement to the forces of the marketplace. A totally free market approach is not always in the public's best interest. (Consider the recent experience of Texans with regards to their hands-off approach to electric power regulations).

Mike Hirsch · Citizen · (Postal Code: unknown) · Mar 09, 2021 3:06 pm

 0 Votes

My name is Mike Hirsch, a resident of the Longfellow Neighborhood of Minneapolis. I am a member of the Justice & Peace Committee of my church, St. Frances Cabrini Catholic Church in Minneapolis and I am guided in submitting this public comment to the proposed Clean Cars Minnesota Rule by my responsibility to be a good steward for our earth. I am also guided by the teaching of Pope Francis in his encyclical, Laudato Si, which among other things, instructs us that the poor are disproportionately affected by climate change and that widespread indifference and selfishness worsen environmental

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problems.

I am older, but it would be a false assumption for me to take the easy attitude that I can ignore what is happening to the environment because I will be long gone before the world experiences the full effects of climate change. For one thing, I have children and grandchildren, and it would be immensely irresponsible for me to ignore the impacts of climate change that they and millions of others will surely experience if we do not take bold and immediate action to start addressing the increasing amount of auto emissions and other sources of pollution and carbon in our atmosphere. Many of those who will be most impacted are those who are poor, who are most unable to protect themselves from the impact of climate change.

I also cannot simply ignore the impacts of climate change because the signs are all around us of the increasingly severe weather events that we are experiencing around the world. Three severe weather events in 2011-2013 had a profound effect in convincing me that climate change is upon us. In 2011, I visited Joplin, Missouri, and saw the devastation created by the EF-5 Tornado that destroyed that community. The next year in 2012, my wife and I made a trip to Duluth and visited the local zoo. Soon thereafter, torrential rains hit Duluth and I remember reading about this 100-year weather event (which are becoming increasingly commonplace, and which cause millions and millions of dollars in damage), which resulted in the seals making their escape in the storm waters that swept through and destroyed the zoo. The following year in March 2013, I was doing research at the state archives in Jackson, Mississippi, and my car was severely damaged by a powerful hailstorm that struck that city (severe thunderstorms with hail, which used to be quite rare in winter, are becoming all too common.) Other examples of climate change up to the present day abound, and in the last few weeks, I have seen pictures of gigantic cracks opening-up in the ice at the South Pole and the reporting that the rapid melting of the glaciers in Greenland may be releasing sufficient cold water into the Atlantic that the natural transportation of warm waters northward by the Gulf Stream could be disrupted with catastrophic impacts on world climate patterns and agricultural production.

I could go on and on about the signs that are before us as to why it is imperative that we take bold action now, while we still can, to reduce auto emissions and encourage the protection of our planet. The proposed Clean Cars Minnesota Rule through its reduction of automobile emissions will help protect our health, address climate change, provide additional consumer choice for Minnesotans by encouraging auto makers to make more electric car options available in our state, including electric SUVs and crossover vehicles, and help grow our economy through creating transportation infrastructure, including encouraging outside investment and developing a network of public charging stations in our state.

I urge the adoption of the proposed Clean Cars Minnesota Rule by the Minnesota Pollution Control Agency. Transportation is one the main sources of emissions harming our environment and cleaner cars is a clear opportunity for us to reduce emissions. The time to act is now to combat climate change and cut back on auto emissions.

Benjamin Zycher · Citizen · (Postal Code: unknown) · Mar 09, 2021 4:37 pm

 2 Votes

Comment on the Proposed Electric Vehicle Mandate for Minnesota

Benjamin Zycher

Benjamin Zycher is a resident scholar at the American Enterprise Institute.

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It is unsurprising that the mandate for sales of electric vehicles in Minnesota is being proposed by unelected bureaucrats at the state Pollution Control Agency, thus bypassing the legislature. They would not have to face the voters as the mandate imposes sizable new costs on residents while yielding no benefits in terms of any rational public policy objective. And Governor Tim Walz will be out of office when those adverse effects emerge in force. Democratic accountability? What's that?

The climate "crisis" justification for the EV mandate is deeply dubious. Put aside the absence in the climate data of support for assertions of a "crisis" whether ongoing or imminent. Minnesota greenhouse gas emissions are 1.7 percent of the U.S. total (Table 2). Net-zero emissions by the entire U.S. would reduce global temperatures by 0.1 degrees by 2100, using the Environmental Protection Agency climate model under assumptions consistent with the modern peer-reviewed literature on the temperature effects of reduced GHG emissions. (The entire Paris agreement: 0.17 degrees.) Elimination of all Minnesota GHG emissions would reduce temperatures by about 17 ten-thousandths of a degree. Elimination of all Minnesota GHG emissions from the transportation sector (about 35 percent of the total) would reduce global temperatures in 2100 by about 6 ten-thousandths of a degree. How large are the costs that the state's residents ought to bear to achieve such laughable outcomes?

The "clean" label usually applied to EVs is dishonest: EVs create their own set of serious environmental problems, among which are the emissions from the production processes for the EVs, and from the power generation needed to charge the batteries. (A power system based mostly on wind and solar power cannot work simply as a matter of electrical engineering.) There is the "rare earth" and other toxic metal pollution attendant upon the production of the batteries, the massive disposal problem for the batteries at the end of their useful lives, and on and on. EVs are anything but "clean."

The costs of the mandate would be enormous. The proposed artificial increase in the market share of EVs will require indirect subsidies in the form of higher prices for conventional vehicles, with part of those sales revenues used to reduce the prices of the EVs. As a result of the mandate, Minnesotans should prepare to pay \$1,139 more for all vehicles regardless of fuel type according to the Pollution Control Agency's own proposal. Overall, consumers across the country spend approximately \$13,000 extra for the EVs, according to January 2021 transaction prices. Accordingly: The argument that the EV mandate will offer consumers "more choices" comes with a sizable price tag. The MPCA claims that by 2034 EVs will cost almost \$7,000 less than conventional vehicles. Really? Then why is a regulatory mandate necessary?

A regulatory requirement is necessary because EVs cannot satisfy consumer needs and preferences. EVs have poor range, particularly in cold climates, long charging times, and other major disadvantages. Such vehicles simply are preposterous for the agricultural sector, for people with lengthy commutes, and for many others who would be forced to pay higher prices for conventional vehicles so as to subsidize EV purchases by urban residents.

The EV mandate, by making personal and business transportation much more costly and difficult, will create over time a household and business location shift away from rural, exurban, and suburban regions toward urban centers. The mandate, therefore, is little more than a surreptitious but standard effort to transfer wealth to favored constituencies. More fundamentally, it would serve the broader leftist goal of making massive numbers of ordinary people ever-more dependent upon government, by making


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personal transportation vastly more difficult.

The proposed mandate is being modeled after a similar policy that has been implemented in California, as part of that state's implementation of climate policies. It is no accident that prices for electric power in California now are the fifth-highest in the lower 48 states, and the California EV mandate is creating similar adverse effects that are beginning to emerge. Precisely why should Minnesota emulate this?

Lauren Deutz · Citizen · (Postal Code: unknown) · Mar 09, 2021 8:11 pm

 1 Votes

The City of Marshall Economic Development Authority has passed a resolution opposing the California's Clean-Car Initiative on Feb. 17th 2021.

Marshall, Minnesota has 2 automotive dealerships that sell new vehicles which equates to nearly 148 jobs and in 2020 these dealerships generated sales of \$116.6 million, and had a payroll of \$8.6 million and the pandemic resulted in an approximate 20% drop in vehicle sales and affected jobs in the automobile market.


That on a national average, approximately 5% of vehicles purchased in a state are registered to customers from outside that state and in Minnesota that number of vehicles purchased in Minnesota, but registered outside the State of Minnesota is approximately 10% of total sales and that some dealerships dependent on customers from neighboring states for a significant portion of their sales.

It has been estimated the price of all vehicles will increase by a minimum of \$1,139 with the adoption of the California emissions standards, and that the price increase would negatively affect sales that Minnesota automotive dealers make to customers from surrounding states.

Cross-border sales and the inability to locate certified dealers and mechanics will be a hardship on dealers and consumers and would adversely affect communities in greater Minnesota and if the federal government plans to restore the stringent vehicle emission standards the MPCA has historically relied on, the Minnesota Auto Dealers Association has advocated opposition to Minnesota moving forward with a plan to follow the California regulations and standards, instead of waiting for the Biden Administration to reinstate the previous standards.

Minnesota's auto dealers are requesting the Walz Administration drop this rule making plan and work with our legislators and stakeholders for homegrown solutions to address climate change and advance cleaner vehicles; and the Minnesota Auto Dealers Association and the Marshall Economic Development Authority believe that the rule making process is an inappropriate process to address the automotive emissions issues and further believes that legislative action, discussion, and vigorous debate on this matter is a more legitimate process to follow for the adoption of appropriate rules and regulations for automotive emissions.

Guy Caruso · Citizen · (Postal Code: unknown) · Mar 10, 2021 10:03 am

 1 Votes

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OHA Docket Number: 71-9003-36416

RE: Proposed Revisions to Minnesota Rules, Chapter 7023 Adopting Vehicle Greenhouse Gas Emissions Standards (Clean Cars Minnesota)

Dear Administrative Law Judge Palmer-Denig:

The risks of climate change are certainly real and the need to take bold and pragmatic action is clearly pressing. Like many people in Minnesota, including Governor Tim Walz, I am an advocate of responsible environmental stewardship and effective climate action. I am a senior advisor in the Energy Security and Climate Change Program at the Center for Strategic and International Studies, a Washington-based think tank. Prior to that, I was Administrator of the U.S. Energy Information Administration from 2002 to 2008. In 2018, I served as president of the U.S. Association for Energy Economics, a non-profit forum.

I write in regard to a proposed rule in Minnesota that would tie the state's policy on electric vehicles to California's Zero Emission Vehicle program. The rule, first recommended by the Minnesota Department of Transportation in August 2019, was this past December officially proposed by the Minnesota Pollution Control Agency. If implemented, the rule would require vehicle retailers in Minnesota to stock a certain number of electric vehicles, all for the purpose of mitigating the risks of climate change and improving public health through pollution reduction.

As someone who has devoted my career to prioritizing the reliance on credible and accurate data for informing sensible policymaking, particularly on climate-related issues, I was most very concerned to learn about the Minnesota Pollution Control Agency's miscalculation of data related to a government mandate on dictating the sale of electric vehicles in the state. A series of miscalculations, all of which are now publicly available, was used by the agency to advance this mandate, which resulted in gross overstatements of environmental and health benefits and which distorted for the public and policy makers the value of the mandate itself.

First, the agency's miscalculation grossly overstated the costs of particulate matter (PM) emissions, which are a mixture of solid particles and liquid droplets found in the air and a term used as a general proxy for air pollution. As the agency has now admitted by publication of its addendum to Statement of Need and Reasonableness, its calculations were off by any entire decimal point on their calculations of the PM tailpipe emissions rates. While the agency has attempted to minimize this error by stating that it "does not impact the overall need for and reasonableness of the rule," the result is a significant distortion of the proposed rule's effect on PM emissions.

For example, the agency initially projected that the electric vehicle mandate would reduce net cumulative well-to-wheel PM emissions by 3,245 tons over 10 years. After admitting its error, that number is just 552 tons. A page later on its addendum, on Page 4, the agency altered its table assessing "PM emissions costs and benefits from the proposed rules over time (with average electricity generation mix) in tons." The result was that tailpipe emissions benefits were downgraded by a factor of about 10, and in many cases, far more. For 2025, the first year the rule would go fully into effect, the benefits were revised from 20.6 tons of PM emissions avoided to 2.1 tons. Looking at projections for 2034, the most distant year in the projections, the mandate's projected benefits fell from 597.7 tons of PM emissions avoided to just 66.5 tons. This is a staggering difference.

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Second, the miscalculation had a similar effect on projections related to avoided health outcomes. On page 6 of the addendum, a table shows “Estimated health benefits of the proposed rule over first 10 years of implementation.” After the agency discovered and fixed its error, premature deaths avoided fell from as many as 348 lives saved to somewhere between 28 and 65. Another figure, respiratory emergency room visits, fell from 82 to just 15, while projections for work loss days fell from 18,453 to just 3,555. Regarding avoided asthma exacerbation, that figure was downgraded from 4,405 incidents to 857.

While every life in Minnesota is worth saving and every day of work lost hurts the economy, the differences in these projections are remarkable and the value for the state’s citizens much less attractive. Moreover, such basic errors and their extrapolations into specific data, e.g. lives saved, should lead officials to call into question the methodology used to determine this data. At the end of the day, the agency’s carelessness with data led to a remarkable overstatement of the mandate’s benefits, any of which were designed to emotionally appeal to citizens and policy makers alike.

Third, in addition to the overstatements of fact the agency has now admitted and revised, the agency has improperly and unprofessionally used data from Cars.com to make its case about the unavailability of electric vehicles for sale in Minnesota. As Amber Backus with the Minnesota Auto Dealers Association has explained, the agency’s reliance on Cars.com as a data source is inappropriate, as such data offers an inaccurate picture of electric vehicle unavailability.

“The MPCA vastly undercounts the EV supply by pulling data from cars.com. Cars.com is not an aggregator of vehicle supply,” Backus states. “It’s a third party advertising platform dealers pay to use if they want to list their vehicles for sale.”

The use of this data distorts the reality in Minnesota when it comes to electric vehicles. The Minnesota Auto Dealers Association’s own analysis of electric vehicles pulled from manufacturer websites shows at least twice as many electric vehicles on Minnesota car lots as those listed on Cars.com. Furthermore, Backus explains that while the agency claims car lots in Duluth, Bemidji and Marshall had no electric vehicles available for sale on July 9, 2020, dealers themselves have affirmed that they did, in fact, have such cars on their lots for sale. But since those dealers don’t advertise on Cars.com, the agency overlooked those vehicles and, as a consequence, presented a false picture of reality.

Finally, it cannot be overlooked that the California model, on which Minnesota’s electric vehicle has been modeled, has itself overstated its own value. A February 23rd report from the California State Auditor has found that the California Air Resources Board (CARB) “has overstated the GHG emissions reductions its [low- and zero-emission vehicle] incentive programs have achieved.”

“One effect of this overstatement is to obscure the programs’ cost effectiveness in reducing GHG emissions,” the report states. Even without making the basic errors the Minnesota Pollution Control Agency made in its calculations, California itself, ground zero for electric vehicle mandates, has overstated the benefits of its own mandate.

I believe that electric vehicles can be part of the climate change solution, but the miscalculations made by the Minnesota Pollution Control Agency are appalling and call into question the very basis of the rulemaking. If the agency made errors of such a basic nature in calculating benefits, what other basic misuse or miscalculations lie waiting to

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be discovered? At a minimum, this rule should be examined by the state legislature in a manner in which accurately depicts the costs and benefits so that all elected lawmakers can weigh in with a legislative approach rather than rush through with administrative rulemaking. In this case, such additional scrutiny and diligence seems warranted and necessary.

Sincerely,

Guy Caruso
Former EIA Administrator (2002-08)

Response:

Bill Kaemmerer · Citizen · (Postal Code: unknown) · Mar 11, 2021 8:14 pm
So if the proposed rule has less of an impact on reducing particular matter emissions and avoiding premature deaths than originally calculated, doesn't that mean that the rule needs to be even stronger in its provisions for the sake of our air quality and public health? not abandoned?


Charissa Verdoorn · Citizen · (Postal Code: unknown) · Mar 10, 2021 10:13 am

 1 Votes

I strongly support the Clean Cars MN ruling. As a Christian, I believe it's our duty to care for our planet and each other, and moving toward electric vehicles is a key way to live this out. Not only does air pollution (partly from all the fossil fuels being burned in combustion engines!) kill a staggering 8.7 million people annually, but transportation is a huge source of greenhouse gases, adding to the climate crisis. We need to move toward electric vehicles as quickly as possible, and that includes increasing the accessibility and affordability of electric cars. The next car we purchase will absolutely be electric, and we hope that when that happens, we'll have a large selection of both new and used models here in MN to choose from.

Thank you,
Charissa

Greg Stuedemann · Citizen · (Postal Code: unknown) · Mar 10, 2021 10:44 am

 2 Votes

If the metro area people believe Walz's green ideas are so great let the metro libs pass a Hennepin County rule and let us Rocks and Cows alone!

Dan McElroy · Citizen · (Postal Code: unknown) · Mar 10, 2021 11:40 am

 2 Votes

The goals of the proposal are laudable but the rule itself is unnecessary and could be counter productive. Abdicating this opportunity to improve our environment to California is a very bad idea. Inserting a complex bureaucracy into a marketplace that is already working isn't helpful, particularly when the states around us aren't likely to adopt this

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approach. I've attached a letter with my more detailed concerns.

GLENN NELSON · Citizen · (Postal Code: unknown) · Mar 10, 2021 3:13 pm

👍 2 Votes

I stand opposed to the rules to be set forth. I have several concerns on the proposal of this mandate to be put into regulation law to citizens of Minnesota. I will admit that I am concerned about the Climate Change direction of many of our leaders and others around the country. However, I am trying to objectively present pros and cons on the proposed changes to emission rules of our state.

Why does Minnesota set up a agency that is already provided by the Federal Government? This process of establishing a agency is more than a double cost to the taxpayer. I heard within one of the public meetings was provided a cost of over \$500,000. As a taxpayer, I seek the help of state employees and elected officials to save me money, not to promote additional costs and taxes that have to be raised to pay for this regulation. Could our State not spend \$1M to find advertising programs that would fairly allow the citizen to come up with a owner's decision to purchase a electric car? Could not the State send a delegate to Washington to lobby for rules that would not be redundant. This is the number one concern.

During the meetings, I felt a biased approach to the meeting speakers. For positive comments that were provided by citizens, these comments were promoted and spoken of positively. However, when negative or challenging comments were noted, then those that comments were instructed to go to certain pages of the report to get their answer clarified.

THE ELECTRIC CAR PROMOTION

Yes, there will be future for the electric car. However, the industry and technology is still going thru numbers of changes. I have a lawn and garden business, and the provided battery voltage for several types of handheld equipment has changed over the last 5 years. This leaves the consumer frustrated in trying to find a replacement battery. Often times, the replacement handheld equipment battery is more than the total product to be replaced. The consumer then has to throw away a product that could have remained in use, but the battery cost or obsolete or discontinuance of the battery due to technology changes has made the product obsolete. What is the cost of replacement batteries for the electric car or even the hybrid vehicle?

As a business owner of lawn and garden equipment, I recently was provided training in electric lawn mowers. Concern over the use of this equipment is the amount of time (driving range) of the lawn mower to approximately one hour before a charge is required. Life of the battery was expected to be seven years. Conditions of battery charge were related to height of grass, thickness of the grass, flat ground, or other conditions that would shorten the usage time of the machine. Battery usage was also temperature restricted for cold conditions and hot temps. Temperature protection was installed in the battery to shut it down if those temps were reached.

Now think about the electric car. Most manufactures provide information on driving range, but now think of those conditions that will shorten the range. Temperature, starting and stopping, driving conditions, driver and number of passengers, accessories of heating and A/C, power steering, on board computer, or even the use of the radio. If these cars are so good for us, how about the State providing their own trail period of electric car usage as a report to the public?

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How are these cars going to be taxed? I saw on the report of the State charging a flat rate fuel tax permit. Obviously, the consumer will not be paying gas taxes to improve roads or other transportation costs of the state. I read the report that supports a yearly fuel tax. But what about those consumers that may have different miles of usage? I surmise that eventually there will be a odometer reading to charge a tax.

Myself as a taxpayer and others, are now being taxed to subsidize the electric cars purchased. The subsidy is promoted to the original owner as a boost to purchase the car. I have to pay for that give away money. States by law must balance their budgets, but the Feds are burning up the credit card and for out of control spending, there will be a greater result of tax increases on our kids. I am pushing back.

We live in a more rural area of the state. Electric car purchases must be made thru only interstate sales. What about service? Again, mostly larger dealerships will be the only point of service for these vehicles. As a mechanic and business owner, why should I get trained on a electric car that I may or may not see within a year's time? Why should I go thru that expense of training and special tools? The broken EV, if that car breaks, I or the owner may have to consider sending the car 100 miles or more to get serviced? The suggestion here would be to promote the electric cars in a large city populations where service and other customer help EV consumers where ownership and service would be easily available. The State regulators are pushing for EV cars.

I see a number of groups of people that were interested in the electric car program. Those that are concerned of a personal nature and desire to seek clean air and water conditions due to emotion of the public information that has been provided to them. Another group is the lobby group that will promote the car. And then there are the concerns of those against the car. If I consider a EV, I will seek dealership employees that will provide me with the model desired, costs, concerns, and other ownership facts of a electric car in the different areas of the state. I reviewed the information provided and found facts to be missing that would be important for ownership.

Charging stations will be set up around the state. When you consider the number of stations that will be eventually required or needed, due to consumer considerations, this cost will be enormous.

Electric cars should be advertised as a "second" car approach. Present facts such as range, usage, and other factors of a limiting vehicle should be known. This car is not the answer to all. As a consumer, I will consider the car, at present, a car that could be used as a vehicle to be used locally only on a limited mileage basis and as a savings.

Are we going to see gasoline prices raise because of the push for electric cars? In the past, we have seen the cigarette price increase to very high amounts, but the sales are still around today. Are our state officials going to nudge other costs of fuel powered vehicles to promote another product? Will they give up their boats, snowblowers, campers, side by side off road vehicles, pontoons, or other gas fueled equipment they use everyday or is this a double standard?

There was talk of a dream for electric school buses. Would there be a fair discussion on this type of transportation. These buses break down, and often times in the rural areas. No battery power means no heat. See concerns of temperature on vehicle batteries. Or other breakdowns that present a new list of possible problems for the school or bus owners. This type of transportation will come, but not at the drop of a pen. Technology still coming.

These rules were taken from California. We are from a different state and different location in our country. Emission standards will be set up by Minnesota. Now, this is a one state leading approach that will set up these standards. Air does not stop at state lines and as a result the conditions of surrounding states will affect the air quality within Minnesota. This was addressed by the report, however I have to comment on the topic. I have been involved with a frustrating condition of MN dispensing rules of diesel fuel being sold in Minnesota. I own a 2006 truck, which the owner's manual states that I

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must use only 5% or less bio blended fuels or diesel engine damage will occur. I visited with state officials from Dept of Commerce, Bio Fuels, or others related to fuel quality and regulation. I was unsure of their fuel requirement response. Their comments promoted the permissible use of a fuel (B20) and would not provide a convincing decision that B20 would not result in possible engine damage. I visited with General Motors on the manual instructions. GM confirmed the owner's manual directions on specified fuels, provided me with a case number, and stated to me that I can only use a fuel with 5% or less bio fuel. I have made my comments known to my state representative or others stating I now have a truck that is obsolete in usage in MN at different times of the year. Repairs are very expensive to diesel engines. If fuel related repairs are made to the engine of the truck, those parts that are replaced will be 5% bio fuel limited. This was because Minnesota was going to be a leading state for bio fuels. Now we have a leading state that is promoting rules that are redundant of a federal agency.

I could use the bio fuel in MN, but considering the cost of repairs and the advice of the manufacturer for the specified fuel, I will fuel the truck in states that can provide me the specified fuel. This will affect the fuel taxes, but will save me the repair costs of fixing the truck. This rule change on emissions is a state one sided approach.

EV and the cost of repairs can be less costly to the owner. This information was provided by the report and I am confident that this statement is true. As a battery issue, I am not sure of the life of the battery for each of the manufactured vehicles. I have knowledge that lithium ion batteries have a life expectancy and number of charges they will accept. Also the batteries are subject to temperature limits. If a car in the summer sets in the open sun, because of high inner temperature of the car, will the car battery provide electricity with the high temps? During the winter, will batteries remain alive and provide a amount of operation time for the vehicle at very low temps? I have knowledge of electric mowers operation that will shut the battery power source down if temperature limits are met and exceeded. This was installed as a safety protection feature. And again, as the battery is providing power for heating/AC, computer, power steering, or other power requirements, the range of the vehicle will be limited. But, with a limited battery life to consider, the owner must save and consider money for future battery repairs. A electric car could be a car of second car ownership? Allowable, but customers must know the limitations and warnings before a loss of battery power or limits of operation because of the electric car means to move the car.

Climate Change approach? I still find a large number of research responses either for or against the climate change theories. For the State to approach the consumer on a basis that we can control the climate, I strongly will question the theory. Yes, with the approach that the consumers of this earth can affect the clean air or other factors that affect air that can be trapped by mountains that help promote smog or other physical problems of communities, as for California, I would promote the effort. However, I question the amount of money required to so call move the line that will change our climate to make better living conditions. That small amount of a percentage movement result could be either moved by a natural climate change, or earth's change over years of temperature changes. Regulators could state that their efforts were the result of the change, but these scientists could not specifically state that this was the result of the effort to control emissions. Those moves are controlled by the Lord and faith that he will provide the people a great place to live.

So, I stand not to support this rule making. The sense that I surmise is that the state government is promoting a company or product in order to achieve a goal. Our state is not in the business nor shall it be used to promote a business. Within the proposed rule, their creates a credit system for vehicle dealers in order to promote the EV car. We also see tax dollars spent to allow consumers discounts or promotions by the State to purchase vehicles. We also see that a industry would not exist except for the grants and

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monetary support provided by government. I see a electric vehicle will come about in time, but not at every tax payers expense.

Judith Kassa · Citizen · (Postal Code: unknown) · Mar 10, 2021 4:18 pm

👍 2 Votes

Forcing the market to comply with these ridiculous standards will not deliver the results we all want and cost Minnesotans thousands of dollars. Additionally, this needs to be transparent and not snuck through as it is attempting to be now.

Judith Kassa · Citizen · (Postal Code: unknown) · Mar 10, 2021 4:23 pm

👍 1 Votes

If you want to drive an EV, go ahead, but don't force people to do so.

Judith Kassa · Citizen · (Postal Code: unknown) · Mar 10, 2021 4:23 pm

👍 1 Votes

If you want to drive an EV, go ahead, but don't force people to do so.

Judith Kassa · Citizen · (Postal Code: unknown) · Mar 10, 2021 4:23 pm

👍 2 Votes

If you want to drive an EV, go ahead, but don't force people to do so.

Mindy Granley · Citizen · (Postal Code: unknown) · Mar 10, 2021 4:37 pm

👍 0 Votes

Please see attached comments from the City of Duluth, in support of the Clean Cars rule.

Mindy Busch · Citizen · (Postal Code: unknown) · Mar 10, 2021 5:52 pm

👍 1 Votes

I agree with Judith. After researching EV vs Gas/Diesel vehicles, the choice is clear to me. Found this in Forbes and totally agree.

"To begin with, about half the lifetime carbon-dioxide emissions from an electric car come from the energy used to produce the car, especially in the mining and processing of raw materials needed for the battery. This compares unfavorably with the manufacture of a gasoline-powered car which accounts for 17% of the car's lifetime carbon-dioxide emissions. When a new EV appears in the show-room, it has already caused 30,000 pounds of carbon-dioxide emission. The equivalent amount for manufacturing a conventional car is 14,000 pounds.

Once on the road, the carbon dioxide emissions of EVs depends on the power-generation fuel used to recharge its battery. If it comes mostly from coal-fired power plants, it will

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lead to about 15 ounces of carbon-dioxide for every mile it is driven—three ounces more than a similar gasoline-powered car. Even without reference to the source of electricity used for battery charging, if an EV is driven 50,000 miles over its lifetime, the huge initial emissions from its manufacture means the EV will actually have put more carbon-dioxide in the atmosphere than a similar-size gasoline-powered car driven the same number of miles. Even if the EV is driven for 90,000 miles and the battery is charged by cleaner natural-gas fueled power stations, it will cause just 24% less carbon-dioxide emission than a gasoline-powered car. As the skeptical environmentalist Bjorn Lomborg puts it, "This is a far cry from 'zero emissions'".

As most ordinary people mindful of keeping within modest budgets choose affordable gasoline or diesel-powered cars, experts and policy advisors the world over have felt compelled to tilt the playing field in favor of EVs. EV subsidies are regressive: given their high upfront cost, EVs are only affordable for high-income households. It is egregious that EV subsidies are funded by the average tax-payer so that the rich can buy their EVs at subsidized prices.

The determination not to know or to look away when the facts assail our beliefs is an enduring frailty of human nature. The tendency towards group think and confirmation bias, and the will to affirm the "scientific consensus" and marginalize skeptics, are rife in considerations by the so-called experts committed to advocating their favorite cause. In the case of EVs, the dirty secrets of "clean energy" should seem apparent to all but, alas, there are none so blind as those who will not see." (Tilak Doshi)

Response:

Lisa Schreifels · Citizen · (Postal Code: unknown) · Mar 12, 2021 4:34 pm


I disagree with your modest budget comment as EV's have reduced maintenance costs for the consumer. Sales of traditional non-plug in hybrids, which work great for us in Greater Minnesota will still benefit the manufacturers in getting compliance with the emission portion of this rule. Your premise of a vehicle only lasting only 90,000 miles is much, much too low. I do agree with your concerns over emissions in the manufacturing, and the end-of-life battery recycling.

Response:

Diana Schleisman · Citizen · (Postal Code: unknown) · Mar 14, 2021 12:27 pm

Are electric vehicles the perfect answer? No, not the way they are now. They have issues and concerns as you and Lisa mentioned. However, electricity is a more available and reliable resource than gasoline. If I were given a choice of a solar charger for my cell phone or a filled gas generator that had to last me a year I would choose the former in a hot second. Plus, it would reduce some of our oil dependency which is a huge aspect that does not affect the environment. So, from a macro economic perspective that adds value to this proposal as well.

Dave Reichert · Citizen · (Postal Code: unknown) · Mar 10, 2021 5:58 pm

 0 Votes

I urge support of the Clean Cars rule changes. We must take these additional actions to decrease greenhouse gas emissions from our transportation sector.

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Bill Nieters · Citizen · (Postal Code: unknown) · Mar 10, 2021 8:18 pm

👍 2 Votes

If Minnesota residents truly wanted to purchase electric vehicles the dealers would have lots full of them. If we wanted to purchase them the government would not have to force the rest of the population to cough up tax credits so the elites can drive in their \$100,000 Tesla while taking \$7500 in tax money for doing so. Let the free open market determine what people will buy and drive.

Laine Crump · Citizen · (Postal Code: unknown) · Mar 10, 2021 8:23 pm

👍 0 Votes

I fully support the proposed rules adopting vehicle greenhouse gas emissions standards. This is a commonsense and much needed step toward a cleaner future for all Minnesotans. It allows for more electric vehicle options for consumers, protects our communities from excessive air pollution, helps reduce greenhouse gases that cause global warming, and does not put any burdens or restrictions on regular Minnesotans who currently own or want to buy gas powered cars or trucks.

Nate Brown · Citizen · (Postal Code: unknown) · Mar 10, 2021 8:31 pm

👍 2 Votes

I believe this rule will unfairly penalize rural Minnesotans. As many have already stated, EV's are not a great fit for rural MN as of now. Car dealers in rural MN should not be FORCED to carry vehicles that don't fit their market. It will raise their costs, which will they will pass on to their consumers - their fellow rural Minnesotans. Furthermore, many rural folks have already felt the economic pain caused by emission regulations directly. Anyone that uses diesel equipment to produce the food and fiber that benefits society has been FORCED to use dubious emission technology that has increased their cost of production reduced the reliability of their equipment. Forgive me when I get a bit suspicious of government regulation designed to improve emissions. Anyone who has watched their tractor burn several gallons of diesel while "regenerating" understands what govt mandated emissions sometimes leads to.

Nellie Berkenpas · Citizen · (Postal Code: unknown) · Mar 10, 2021 8:45 pm

👍 1 Votes

I oppose this rule. The economic impact of this rule will be detrimental to rural Minnesotans.

Betty Wheeler · Citizen · (Postal Code: unknown) · Mar 10, 2021 9:12 pm

👍 1 Votes

To The Honorable Judge Jessica Palmer-Denig:

I strongly support the MPCA's "Clean Cars MN Rule". OAH Docket No. 71-9003-36416

This rule is entirely legal and necessary. The Minnesota State Legislature has given the

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MPCA the authority for promulgating this type of rule, and that authority is long established in law. The need for this rule was well-researched and authored by air quality and other experts, acting on behalf of the best interests of Minnesotans state-wide. Unfortunately, there are many comments submitted to you which ostensibly result from a misunderstanding of the legal basis which gives the MPCA the authority to write this rule.


This rule has the support of a vast number of Minnesota's residents, most of whom are very concerned with the kind of Earth we will bequeath our children and grandchildren. Many of us actually think this rule is extremely modest in scope. After reading this rule, I cannot tell you how many people asked me why the MPCA is only offering such a timid approach.

There is no longer any question that the deleterious effects wrought by humans on our one and only planet is dramatically warming its atmosphere. Such warming is creating the potential for runaway heating that might not be able to be stopped, if we don't make serious changes now. This rule is a small but significant step toward addressing those threats.

I am attaching a letter in support of this rule that more systematically explains my support. Please accept all of my comments into your consideration.

Thank you for considering public comments on this rule.

Rachel Daberkow · Citizen · (Postal Code: unknown) · Mar 10, 2021 9:34 pm

 1 Votes


While I am a huge supporter of clean air for Minnesota, I cannot support this administrative rule making process put forth by MPCA. I am in support of the legislature holding hearings, passing House or Senate files and working in committees that have debated and considered all sides of an issue. I am not in support of the administration bypassing the legislative process for rule making.

As I looked to update my 3 year old flex fuel vehicle this year, I realized that automakers no longer are producing the flex fuel vehicles like they did even 2 years ago. We have an available clean air option TODAY with E85 and we are not even utilizing it! Incentives went away for automakers but demand didn't and now consumers are forced to take 10 steps backwards to have vehicles only intended for E15.

As a greater MN traveler & worker, I have days where I do not even pass through towns larger than 300 population much less see opportunities on how to utilize an electric vehicle.

This rule making is not to be taken lightly and by sidestepping the legislature to accomplish it, I cannot support it in anyway. Nor do I feel this is in the best interest of all Minnesotans.

Julie Jones · Citizen · (Postal Code: unknown) · Mar 10, 2021 10:09 pm

 1 Votes

In 2007, when I decided to purchase my second hybrid vehicle, I waited for 6 months on

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a waiting list. When I inquired as to what was taking so long, the salesman laughed and told me I needed to go to California to get the particular model I wanted. Now, years later, I want to trade in my hybrid for an EV, and I fear the same thing is going to happen. I want the freedom to buy an EV, and to have a reasonable selection to choose from. It is very apparent that this rule is needed to give Minnesotans free choice in vehicle selection.

I recently remodeled my kitchen and spent thousands of dollars plumbing in a natural gas connection to switch from an electric to a gas stove. Wonder if I made that investment, and then was told I had to go to California to buy the gas stove I need for my newly remodeled kitchen because manufacturers only sell those in California? The same crazy thing could happen to me on plans to switch to an EV. I will need to spend thousands of dollars installing an EV charging station in my garage before I purchase the vehicle, because I can't bring it home with no means to charge it. I may make that investment and not be able to get an EV for years. Manufacturers should not have the right to limit my freedom to purchase the product I want to buy.

Kathy hicks · Citizen · (Postal Code: unknown) · Mar 10, 2021 10:24 pm

👍 2 Votes

I do not support this act. California can stay in California. In fact you should build a fence along the California border and give that back to Mexico. In time when you can show and prove that you have a good plan than we as citizens should be able to apply to these things. If people want to smoke pot than they can move to colorado. If you hate the smell of pot than move to minnesota. Can't stand abortions than live in south dakota. Don't want to pay state tax than move to florida. We in minnesota cannot because of the weather rely on solar, wind mills, and electric cars. It takes six batteries to charge a golf cart. Needs to be charge daily. Charging takes electricity which comes from fossil fuel. All of this is a scam for state and federal government to steal money from the middle and low class americans. Also all these things that you propose should be commercial on free TV. I call free TV democrat TV. Blast this out to all the people loudly on our local TV so we all have a chance to voice our opinions. Our government are crooks trying to take every penny you can get. What is wrong with letting people have money especially those that earn it. I believe this country is quickly ruined by democrats. Brain washing our children to believe the world is going to end soon. I was told the world was going to end in 1979 by my history teacher. California doesn't have the grid and enough electricity to support electric cars. Admit that your agenda is only to charge everyone more money using our natural resources to punish us for your gain. God gave all of us the sun, earth, wind, rain, water, and air. He did not give it to the governments to gain profits off of these things. That is called scamming the american people for profit.

Bill Wilson · Citizen · (Postal Code: unknown) · Mar 11, 2021 7:15 am

👍 2 Votes

There is no place for CA levels of controls for cars in MN. For every study saying one thing there is another that holds the same validity saying the opposite. I will support the side of this issue saying no to the CA levels of controls based on the studies and common sense.

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Rick Swenson · Citizen · (Postal Code: unknown) · Mar 11, 2021 7:26 am

👍 2 Votes

I strongly OPPOSE adopting this rule as it could have future consequences. To adopt a rule like this is insanity. Minnesota is not California and never will be. Our average temperature year-round is around 47 degrees and not a good environment for batteries. Cities are far different than out state, many days we travel 300 plus miles and need a dependable predictable fuel source. Do not force people, or dealerships to purchase something, this is an overstep of free commerce.

The charging infrastructure is not here. Who is going to pay for the infrastructure of charging? How long does this equipment last? This sounds like a very long-term heavy tax burden we do not need.

How long do the batteries last, if they are anything like our phones its not more than a few years. What happens to the batteries then? How are they disposed? I cannot imagine any electric vehicle will travel very far when the temperature is -20 for a week straight. Being stranded on the side of the road with a dead battery and my wife and child is not acceptable.

If charging takes 6-12 hours this is unacceptable in the business world, when we need to get work done, we need to get now not sit at home and wait for a charge.

I travel 45K miles per year for work, what are the long-term costs of a vehicle like this? It sounds like a whole lot more moving parts to break.

Climate change is made up and only meant to control and tax us in the future. The earth changes thru time that's what it does. Man made climate change is a hoax. 10,000 years ago, Minnesota was under ice. Finding fossil shells across Minnesota and the Dakota's show how different the climate can be. Taking a snapshot of just over 100 years in the scale of a billion years is poor science and bad unacceptable data.

Response:

Steve Fuchs · Citizen · (Postal Code: unknown) · Mar 11, 2021 8:34 am

Rick - I agree. You nailed the argument opposing this stupidity. I could not have written my response any better.

Conley Janssen · Citizen · (Postal Code: unknown) · Mar 11, 2021 9:13 am

👍 1 Votes

I am not opposed to EV or different standards....however, they need to make sense for the end user. That can mean "I just want to buy an EV" or whatever. It should not be rammed down the throats of tax payers. In the area of Minnesota I live in and in my business....an EV is NOT possible. Any new vehicle restrictions or requirements will kill my business...(small-business independent). Rather than penalize those of us who can't or don't want to participate in this "program" maybe consider incentives to those that do. The infrastructure and incentives should be paid for by an electric tax on charging use. We pay a gas tax, no reason that there shouldn't be a E-tax.

Response:

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Bill Kaemmerer · Citizen · (Postal Code: unknown) · Mar 11, 2021 7:53 pm

Under this rule, you will still be able to choose among the 92.5% of new cars available for sale that are not among the 7.5% of EVs to be available for sale, fleet-wide. I don't think that should be characterized as "ramming" an EV down anyone's throat.

Admittedly, though, by 2035, you may not be able to buy anything but an EV from General Motors. ("G.M. will sell only zero-emission vehicles by 2035" reported by Neal E. Boudette and Coral Davenport, New York Times, January 28, 2021).

Scott Luhman · Citizen · (Postal Code: unknown) · Mar 11, 2021 11:07 am

👍 0 Votes

I am strongly opposed to the standards proposed. The added cost to transportation in rural and low income families will be too great. Most high emissions vehicle are being removed from the market and replaced by modern low emissions vehicles. The market is already heading in the direction of low emissions vehicles and government is not needed to force us to comply. Other problems are that EV vehicles lose 20% battery capacity in cold weather. Which does not make them appealing to most people that do not have heated garages. Replacing vehicles with EV will not effect the amount of emissions enough to notice. There has been studies that show the change in carbon emissions is less than 1% if all vehicles were changed to electric. If you want encourage sale of EV vehicles at the dealership offer it through tax breaks. I am not opposed to adding charging stations, but again do it through tax breaks, not using our tax dollars. Use the free market to push the change that is already happening.

Greater Minnesota does not want the extra cost and we have no interest in virtue signaling to others through poor policy that should be passed at the Legislative level. If you want to reduce emissions build more nuclear power plants and lower the cost of power for everyone. Do not rely on expensive and unreliable wind and solar energy.

Response:

Bill Kaemmerer · Citizen · (Postal Code: unknown) · Mar 11, 2021 7:48 pm

I would appreciate your providing citations for the studies you claim show that the change in carbon emissions is less than 1% if all vehicles were changed to electric. In contrast, I will cite Bill Gates' book ("How to Avoid a Climate Disaster", 2021) which indicates that although transportation isn't the number one cause of greenhouse gas emissions worldwide (responsible for 16%), it is the number one cause in the United States, with passenger cars being responsible for almost half of the emissions in the transportation category. I'll also cite the study by Williams et al [Williams, J. H., Jones, R. A., Haley, B., Kwok, G., Hargreaves, J., Farbes, J., & Torn, M. S. (2021). Carbon-neutral pathways for the United States. AGU Advances, 2, e2020AV000284. <https://doi.org/10.1029/2020AV000284>] which concluded that, among possible pathways to net-zero carbon emissions by 2050 (needed to slow the warming of the earth), "the highest-priority near-term actions are similar across pathways and have clear quantitative benchmarks for policy: renewables build-out (>500 GW total wind and solar capacity by 2030); coal retirement (50% of LDV sales by 2030) and buildings (heat pumps >50% of residential HVAC sales by 2030). I don't believe that so people who have delved into the topic of global warming deeply would conclude that electrification of light-duty vehicles is a high priority, if "replacing vehicles with EV will not effect the amount of emissions enough to notice," and "there has been studies [sic] that show the change in carbon emissions is less than 1% if all vehicles were changed to electric." Wherever did you get that information?

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Richard Thielen · Citizen · (Postal Code: unknown) · Mar 11, 2021 12:22 pm

👍 1 Votes

I am writing to oppose the Clean Cars Minnesota adoption by the MPCA as a rural Minnesota Resident, an outstate businessman and as President of the Minnesota Charter Bus Operators Association(MCBOA) representing 40 Minnesota motor coach companies. There are many reason to oppose this rulemaking process by the MCPA which will detail later in this comment.

The most grievous reason for my opposition to Minnesota adopting the California Air Resources Board regulations (CARB) is the backdoor method Governor Walz is using to impose these onerous regulation on Minnesotans, bypassing our elected representatives in the Minnesota House & Senate and giving citizens very little opportunity to weigh in their opinions, except this simple comment period. This rulemaking comment exercise can easily be ignored, particularly when the final decision for the CARB adoption is likely pre-determined.

The final insult is for this process to be decided by a single administrative law judge, an elected bureaucrat and political appointee. The administrative law judge will simply decided the appropriateness and legality of the rulemaking process, thus simply 'rubberstamp' the CARB regulations into law with no citizens or elected Representative input and 'Zero' recourse to its final implementation.

Minnesota has enjoyed a national reputation of having clean politics but this backdoor approach by the Governor does not meet up to that standard.

The adoption of the of the California Air Resources Board will take the decision making process out of Minnesota and put it in the hands of CARB, an unelected bureaucratic organization 1800 miles away. California has a population over 7 times that of Minnesota and Los Angeles Metro area alone has more than double that of our entire state. There is very little for Minnesota to gain when we have only the fraction of the population and the problems of California.

The adoption of CARB Rules has been estimated to increase the cost of other non-EV vehicles by \$800-\$2,500 to set up the infrastructure and training for EVs.

In addition to increased cost of vehicles, the largest provider of electricity in Minnesota, Excel Energy is also proposing to the Public Utilities Commission to adopt a \$2,500 incentive for electric vehicle buyers, which would be paid by us, the 'Rate Payers' of the energy companies by way of increased costs for electricity.

As I read through the comments from citizens who propose adopting the CARB rules, one common thread that I find is that most already own EV's or Hybrid vehicles. So apparently it is not impossible to find the vehicles they desire. I can understand that the Metropolitan areas where density is greatest, the opportunity to find the desired vehicles is easier. The problem is exacerbated in outstate Minnesota where automobile dealers have a great deal less density of potential buyers. Forcing these dealers to invest vast sums of resources for a much smaller market share makes this purely a political decision, not a business decision. This is not the role of government.

The American economy is 'Market Driven'. Supply vs Demand. As demand rises, the supply of desired products rises accordingly. The decision for dealers to invest in EV infrastructure and employee training must be able to see some light at the end of the tunnel. As these dealers see the demand increase, they will make the decision whether or not to make that investment. Electric Vehicles may very well play a significant rule in future transportation but it must be 'Market Driven', not forced by government regulation.

Another disturbing aspect of this CARB rule is that it must be adopted in entirety without deletions or changes. Furthermore, any new changes California may make to their CARB

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Rules in the future must also be adopted in entirety by all the states who adopted CARB Rules.

This is not just a 'One Shot Deal', it will be a bad rule "That just keeps on giving". So far, I have only talked about electric vehicles and hybrids that the CARB rules are proposing. But the CARB Rules in California also include Buses and Heavy Trucks. According to CARB Rules, Buses and truck must be quipped with Diesel Particulate Filters(DPF) in order to run in California. Therefore this precludes running older vehicles in the state. For even out of state companies running into the state, such as our MCBOA members, we are only able to run in California with Non-DPF equipped buses and trucks with special permission from CARB and then only for a maximum of 1,000 miles per year total.

The question is whether adoption of these CARB Rules will prevent our own bus and truck operators from operating this equipment unless it is equipped with the minimum of clean air technology. It may or may not be in these CARB rules, now or in the future. Whether the adoption of this CARB rule includes heavy vehicles is open but if not, I am certain it will be not far behind if this rule is adopted.

In September 2019, the Federal Pollution Control Agency revoked its permission for California to set their own clean air rules and must follow the federal standard. A patchwork of clean air rules from state becomes an untenable situation.

Therefore, all this CARB activity may be moot simply because it is against Federal Regulations.

Furthermore, on January 6, 2021, the Minnesota Automobile Dealers Association (MADA) has filed a lawsuit in Federal Court to halt this rulemaking process because Minnesota, along with California, lack the authority to regulate motor vehicle emissions under the Clean Air Act.

We Minnesotans are perfectly willing and able to set our own standards and we certainly do not need a state like California to dictate to us what rules we need to adopt and follow.

Response:

Bill Kaemmerer · Citizen · (Postal Code: unknown) · Mar 11, 2021 8:30 pm
Scroll up to the entry by Jamie Long on March 9 2021 at 1:31 pm and its attached file Clean_Car_Legislator_Letter__3_9_21_.pdf, containing a letter signed by 58 legislators, and reading in part: "the entire 2020 regular session as well as seven special sessions have occurred subsequently to MPCA's initial request for comment on the proposed Clean Cars Minnesota rules in October 2019. The Legislature has had ample opportunity to enact statutory changes in response to this administrative action and has not done so."

John Anderson · Citizen · (Postal Code: unknown) · Mar 11, 2021 12:25 pm

👍 0 Votes

The following is a motion approved by board of the Minnesota Valley Chapter of the Izaak Walton League that is located in Bloomington, Minnesota in support of the proposed new rules being discussed. It is submitted via this website by John Anderson an employee of Conservation Minnesota on behalf of the board.

Brad James · Citizen · (Postal Code: unknown) · Mar 11, 2021 12:35 pm

👍 1 Votes

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My comment relates to the process of rulemaking as a means to work around the spirit behind fiscal notes in the legislature.

Because this rule will have a disproportionate effect on the most vulnerable among us due to the rise in the cost of used vehicles, a fiscal note and economic impact study should be concluded prior to the further analysis of this proposed rule.

Further, when the California standards (incorporated by reference) are modified, a further fiscal analysis should be completed including a study of disproportionality to those who are among the most vulnerable among us.

The request is that the rule making agency submit evidence showing the financial impact of those in the lowest income groupings in the effected class prior to proceeding to the next phase of the rule making process

Response:

Bill Kaemmerer · Citizen · (Postal Code: unknown) · Mar 11, 2021 7:31 pm

It is not at all clear to me how requiring fleet-wide sales of new cars to achieve a certain average level of low-emissions or certain (very low, less than 10%) proportion of new vehicle sales will raise the cost of used vehicles.

Brad James · Citizen · (Postal Code: unknown) · Mar 11, 2021 12:38 pm

👍 1 Votes

Additional Comment: Highway Trust Fund

Enactment of this rule without a corresponding study of the impact on the highway trust fund account and a resulting change to the funding of road building and maintenance is irresponsible.

Further, if the intent of the Agency is to force the legislature into increasing the taxes on non-electric vehicles to cover lost gas tax revenues, the rule has a disproportionate impact on multiple classes of public resource users. Thus, this makes the case that the rule making process is inappropriate for the modification of the standards as outlined in the proposed rule.

Response:

Bill Kaemmerer · Citizen · (Postal Code: unknown) · Mar 11, 2021 7:33 pm

It is not at all clear to me how increasing the percentage of electric vehicles among new car sales from about 2% to about 7.5% is going to result in a huge loss of gas tax revenues, nor that a future road-use tax on EVs could not be a remedy if that were ever to be the case.

Ben Walker · Citizen · (Postal Code: unknown) · Mar 11, 2021 1:04 pm

👍 0 Votes

I think this is a great idea. The low-emission vehicle (LEV) standard sets limits for tailpipe pollution for auto manufacturers, meaning it requires manufacturers to deliver new light- and medium-duty vehicles to the Minnesota market that produce lower emissions of greenhouse gas and other air pollutants. The auto industry has been successfully

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meeting this standard since 2012.

The zero-emission vehicle (ZEV) standard requires auto manufacturers to deliver more vehicles with zero tailpipe emissions for sale in Minnesota, increasing each year.

So for clarity: the clean car standards only apply to new light- and medium-duty vehicles for sale in Minnesota. The clean car standards:

- Do not apply to off-road or heavy-duty vehicles or equipment like farm equipment or semi-trucks
- Do not apply to existing vehicles or used vehicles for sale
- Do not require emissions testing
- Do not require anyone to purchase an electric vehicle (EV)
- Do not affect biofuels or prevent Minnesota from supporting cleaner fuels

Daniel Tikk · Citizen · (Postal Code: unknown) · Mar 11, 2021 2:13 pm

 0 Votes

Dear Administrative Law Judge Palmer-Denig,

I am writing in full support of the proposed adoption of both the LEV and ZEV standards in Minnesota. The Legislature wisely granted the Pollution Control Agency explicit authority to "adopt standards of air quality, including maximum allowable standards of emission of air contaminants from motor vehicles" (Minnesota Statutes section 116.07, subdivision 2). The LEV and ZEV standards are practical, reasonable, and effective tools to limit air pollution and improve air quality for all Minnesotans.

I am the father of a 2-year-old girl. She has no control over the environment in which she grows up, including what cars are driven and the pollutants emitted into the air she breathes. Rules and air quality standards are in place to protect her, myself, and all of my fellow Minnesotans, and the Clean Cars rules are just another component of this regulatory environment.

Passenger vehicles are a major emitter of pollutants that negatively harm public health, in particular the young and vulnerable, and also those who live in close proximity to busy roads. All of these individuals have the right to clean air, and reducing the harmful emissions from vehicles is a concrete way to improve public health, improve people's lives, save money on health care costs, and reduce human suffering. This is precisely what the MPCA has authority to do, and I applaud the MPCA's proposed Clean Cars Rule, a rule that has been effectively tested and bettered the environment in more than a dozen states across this country.

The benefits of adopting the rules go beyond the reduction of pollutants and cleaner air for every resident of this state, regardless of their age or status as a vehicle owner or driver. There will be significant financial savings for drivers at the pump and over the life of their vehicles, and reduced greenhouse gas (GHG) emissions in a transportation sector where Minnesota is failing to meet its own statutory reduction targets. In addition, vehicle models that are only made available by manufacturers in LEV/ZEV-adopted states will become available in Minnesota, providing a broader range of plug-in hybrid and electric vehicle options for consumers.

The supposed negative impacts of the proposed rule are quite narrow in comparison to its widespread benefits. Future car buyers would continue to be free to choose whatever vehicle best meets their needs. In addition, the concerns of automotive dealers that they would be forced to take on unwanted vehicles that will not sell is not based on the reality

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of this rule.

There are no requirements under the proposed rule for each individual dealer to stock specific types of vehicles. Any requirements for sales are set at the manufacturer level, and there is no reason to believe that manufacturers would not facilitate, incentivize, and coordinate the sale of vehicles in a way that ensures success for all parties. Manufacturers have every financial incentive to ensure that dealers are successful with this rule, as has been shown across the country in states where this rule has already been implemented. Currently, there is variety across dealers of the same brand within the state to stock different models, and this would continue under the proposed rule as well. Local markets and preferences can and will continue to be served under this rule.

In conclusion, I strongly support the adoption of the LEV and ZEV standards in Minnesota to bring air quality improvements, health benefits, financial savings, and reduced greenhouse gas emissions to benefit all of our residents.

Thank you,
Daniel Tikk

Jay Johnson · Citizen · (Postal Code: unknown) · Mar 11, 2021 3:06 pm

👍 0 Votes

I support the passage of this rule. While it will not stop the problems caused by our changing climate, it will be a start. The first step in any journey is to start. By using the rules being used by California and other states we will minimize the effort needed by the manufacturers to comply with the rules. I am currently driving a Prius Prime plug-in hybrid. I have previously owned two other Prius hybrids. I am thrilled with the responsiveness of my car while on electric mode. It is disappointing when it drops to standard hybrid mode. I generally will go one to one and a half months between buying gasoline when I am not driving cross country. I have recently been looking to buy the RAV4 plug-in hybrid but was disappointed that I could not find one in Minnesota to test drive. We have a trip to California planned in April and will do a test drive there. The greater electric range on the RAV4 vs the Prius I will go even longer between stops at a gas station. In two or three years we hope to trade in our Prius Prime for an all electric. We will have our future RAV4 for cross country trips until the all electric vehicles achieve the range and the electrical infrastructure for recharging is available for all electric travel.

I strongly believe that the gas powered motor vehicle will be replaced with some form of electric just like the horse was replaced by the gas engine. Minnesota can be a leader with this rule change. Leaders always do better than the followers and those we have drag along.

Taylor Dugger · Citizen · (Postal Code: unknown) · Mar 11, 2021 3:42 pm

👍 0 Votes

I think we should pass this rule. Clean cars are a necessity for our future. This is only just a start, but we 100% should be going this direction. Fossil fuels are dirty, corrupt, and need to be replaced as soon as possible. Clean, electric cars need to be easy and affordable to buy for all people.

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Karen Umphress · Citizen · (Postal Code: unknown) · Mar 11, 2021 9:23 pm

👍 2 Votes

I do not support this rule in its entirety. This rule will circumvent the process we have in Minnesota to decide what is best for us here in this state and not to blindly follow the rulemaking of another State. Not every single item and rule which is created for California should be or needs to be adopted by Minnesota. This rule would take away any choices we have in our State.

By supporting and adopting this rule, you are taking away our rights as Minnesotans to decide what is best for us, to be able to make comments regarding future actions, and to have any say in the policies our State adopts. This rule is not about cleaner cars or cleaner air, but about taking the decisions for our State and giving them to another State.

We can adopt laws and regulations in Minnesota to bring in more electric cars if we wish to do so, without blindly adopting, with no input from Minnesotans, rules created for California.

Gregg Kelley · Citizen · (Postal Code: unknown) · Mar 11, 2021 9:24 pm

👍 0 Votes

Electric cars are better vehicles and we should do everything we can to offer everyone in Minnesota an opportunity to choose an EV. Right now, the EV availability is poor at dealers and we need to change that. We need more plug-in stations across the State and nation. We need to do everything possible to allow greater production of these vehicles to make them less costly to purchase for the average buyer.

Deb Frentress · Citizen · (Postal Code: unknown) · Mar 11, 2021 10:50 pm

👍 2 Votes

OAH docket # 71-9003-36416

I am writing to voice my opposition to the Clean Car Rule proposed by the MPCA. Minnesota is not only a very cold state but also a very rural state. It's no question that electric vehicles lose range in cold weather which would require a range double that of their daily driving needs. New research from AAA reveals that when the mercury dips to 20 degrees Fahrenheit, the average driving range of an electric car decreases by 41 percent. In a rural area this becomes a challenge.

Now add to the fact that Minnesota is also a very recreational state with numerous boat owners, fish house owners, and trailer owners driving all over the state. Towing further reduces an electric vehicle's range.

There's also the question of disposal of the lithium-ion batteries which would have to be addressed.

Lastly but not least is the fact of the cost. The added cost to an electric vehicle may not sound like a lot but will be prohibitive to many consumers.

I think people should buy an electric car when it suits their needs and budget but to mandate that be Minnesotan's only choice doesn't seem to be taking the needs of all the residents into consideration.

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Study Shows Electric Cars Become Practically Useless in Cold Weather.
<https://anewspost.com/electric-cars-useless-in-cold-weather/>

Jennifer Borowicz · Citizen · (Postal Code: unknown) · Mar 12, 2021 7:34 am

👍 1 Votes

I oppose this bill.

Ron Bergemann · Citizen · (Postal Code: unknown) · Mar 12, 2021 7:57 am

👍 2 Votes

I do not support this bill. Minnesota's residents are smart enough to make our own rules to protect our resources. It would be a terrible idea to bind ourselves to rules made by a different state with a very different environment and population density.

Ken Schindele · Citizen · (Postal Code: unknown) · Mar 12, 2021 8:31 am

👍 1 Votes

I am opposed to this bill. I am not convinced that electrical vehicles will solve the environmental concerns this bill is intended to address. It would be unwise to enact legislation that would be more detrimental to the environment as opposed to a solution for a problem that didn't exist. And I am especially opposed to permitting the Governor to administratively direct this rule. This is serious business and should be thoroughly discussed in our legislative bodies so the voices of the people can be heard.

Andy VanDerBill · Citizen · (Postal Code: unknown) · Mar 12, 2021 9:14 am

👍 2 Votes

I am opposed to this action. The precedent that this sets, a state agency enacting such sweeping changes to policy and way of life in this state without any real input from our elected representatives, is deeply concerning to me. Our legislature has been largely blocked from any input on many topics for the last year, that is not how this state should be run. In time, if electric vehicles prove to be a valuable tool the market will figure that out and state mandates will not be necessary.

Chris Kahl · Citizen · (Postal Code: unknown) · Mar 12, 2021 9:20 am

👍 2 Votes

I am strongly opposed to this bill. I along with thousands of others of Minnesota residents will be moving out of MN to South Dakota or Iowa if this bill gets passed. Small business will get pushed out of the state. I have friends in the ethanol industry that tell me that the ethanol produced in Mn will not be able to be used in Mn because it doesn't meet radical requirements of the California emission rules. That's just one example of how stupid California's emission rules are. There is a lot of waste in renewable energies that people forgot about. Some of these include huge mines needed to extract the limited minerals to make electric batteries, the hundreds of acres destroyed for large

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solar panel farms. The large landfills full of windmill blades and land destroyed by windmill farms. What makes the most sense is a heavier use of ethanol. We have the industry built up and it is very effective. If this bill passes, this great state of Mn will become the struggling state of California. Small businesses along with small family farms will be no longer. Governor Walz is overstepping his executive powers and if this bill gets passed, the state of Mn no longer has a voice.

Brittany VanDerBill · Citizen · (Postal Code: unknown) · Mar 12, 2021 9:23 am

👍 1 Votes

I am opposed to this action. My first objection is that our elected officials have been largely cut out of this process. Secondly, Minnesota is vastly different from California, and electric vehicles are not practical here right now. I believe exploring how to get to a point where electric vehicles are practical is an excellent idea. However, issuing mandates that will have so many negative consequences on citizens and businesses in Minnesota is a terrible idea.

Mary O'Brien · Citizen · (Postal Code: unknown) · Mar 12, 2021 9:28 am

👍 0 Votes

I support a strong Clean Cars rule because it would reduce greenhouse gas emissions, improve public health, and reduce costs for Minnesota households. In a recent study, Harvard researchers found that in 2018 nearly 1 in 5 deaths globally resulted from exposure to outdoor air pollution from burning fossil fuels, including in vehicles. In Minnesota, it has been found that air pollution contributes to 2,000 to 4,000 deaths each year. Clearly, burning gasoline in passenger vehicles wreaks havoc on the climate and human health. Minnesotans need transportation to be both reliable and clean. We need a strong rule because we're falling behind on our greenhouse gas reduction targets and because Minnesota's communities are being harmed right now by air pollution.

Response:

Brandon Reed · Citizen · (Postal Code: unknown) · Mar 12, 2021 10:30 am

The 10 largest cargo ships in the world make more emissions than every single vehicle combined... penalizing Minnesotans is not the solution to fixing emissions. We are not the known contributor

Jason Davidson · Citizen · (Postal Code: unknown) · Mar 12, 2021 9:55 am

👍 1 Votes

As a Minnesota native, who has lived in both states (Minnesota for 27 years and California for 21 years), I strongly oppose adopting the California plan for the Clean Cars Minnesota initiative. While protecting the environment is a noble pursuit, squashing freedom isn't. Ramming through this massively-impactful policy outside of the legislature, and deterring public debate by hiding behind Covid-19, is weak. Minnesotans deserve better.

Here's what Californians experience under these rules: Annual or biannual smog checks, at a cost of about \$75, six times the cost to register a truck (I speak from experience), and \$1100 added to the cost of an average car. The cost of 87 octane gasoline in CA is

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also often above \$4 per gallon.

While electric and small cars might be a suitable fit for city-dwellers, they often aren't for rural citizens. I've pulled enough of those cars out of ditches over the years with my truck to know.

Brandon Reed · Citizen · (Postal Code: unknown) · Mar 12, 2021 10:19 am

👍 1 Votes

I do not agree with adopting these regulations. On top of mandating that car manufacturers sell certain percentages of EV, this is going to prohibit buying used vehicles from outside the state of Minnesota in the future. If you want a rust-free vehicle from down south that will not be allowed as it doesn't meet the "standard" and that in itself is no okay with me. Minnesotans should have the freedom to shop around and this is just adding another restriction to our state. This is also going to add testing fees, licensing and everything else. Not to mention new vehicle registration is around 400 dollars a year for the first 10 years. This is going to hurt the working class! There is no reason to adopt this!

Donald Rumpza · Citizen · (Postal Code: unknown) · Mar 12, 2021 10:33 am

👍 1 Votes

I strongly oppose the proposal to adopt the California Air Resources Board LEV and ZEV standards through the Clean Cars Minnesota initiative. What makes us think that the adoption of California rules would be good for Minnesota? The Governor has reached way beyond his duties trying to push through this the back door way. Please just abandon this rule!

Peter Huether · Citizen · (Postal Code: unknown) · Mar 12, 2021 10:40 am

👍 0 Votes

The American Council for an Energy Efficient Economy (ACEEE) strongly supports the Clean Cars rulemaking.

Mitchell Rogalsky · Citizen · (Postal Code: unknown) · Mar 12, 2021 10:58 am

👍 2 Votes

I strongly support this ruling. I used to think our options would organically grow but I've been waiting since 2018 and have seen little to no change.

My wife and I were in the market for an electric car in 2018 and at the time we only had 3 fully electric options available (Nissan Leaf, Chevy Bolt, Tesla), and incredibly limited stock to boot. Most dealerships had 1-3 EVs on their lot if that. We spent 6 months deliberating, made several spreadsheets and even looked at buying out of state. In the end we chose the Tesla Model 3 even though it stretched our budget, but there weren't any better options out there that fit our lifestyle! We sold our other car and have been a single car household since but as our family grows we're looking at a 2nd car again. I'd love to have more electric options to choose from when we make that decision.

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As for EVs in general, we now have 72,785 miles on our 2018 Tesla Model 3. We've gone all over the country in it. We charge it overnight under our co-op's off-peak charging program which is a win-win for us and our electric utility. They get my fuel expenses and load at a good time for them and I get a good rate. Plus here in MN our nights get quite windy! I've even taken to watching the MISO grid stats and charging my battery on particularly windy nights when our transmission system can't get all that clean energy out of the state. We did put solar on our roof in 2019 but, as mentioned above, we charge the car overnight to avoid straining the grid during peak times.

Sierra Swenson · Citizen · (Postal Code: unknown) · Mar 12, 2021 11:06 am

 1 Votes

Logically it does not make sense to go full electric especially in vehicles. We do not have the advanced technology to withstand the amount of electricity if we went full electric. It would take 30 years for us to recycle all of the gas vehicles today. It also wouldn't be efficient because if we can't even utilize solar power and wind power to its fullest extent first. It is not in the best interest of the planet to bite off more than we can chew. We aren't even advanced in our solar power energy or wind. Going full electric and checking emissions you're just tearing the planet down a different way. Utilizing electricity is still harming the planet. This shouldn't even be a discussion until there's more technology and more advancement in wind and solar energy. That's been around for years and hasn't gotten anywhere. Not to mention, electric vehicles do not do well in Minnesota winters. Their battery life is cut in half and the distance it takes us to get down to the cities. Try riding an electric scooter. Yeah it's fun and all but logically you're still killing the planet. Because now, you're making more batteries for vehicles. Talk to any mechanic that actually knows the in and outs of vehicles and their ideas on going electric. It is logically not a good idea. There are already many mechanical problems with the hybrid vehicles. We want things instantaneous, we get mad when they don't work. Just because you think it's saving the planet doesn't mean it is. Manufacturers still process things for these vehicles. Battery acid. The casing itself. It all gets manufactured and still produced in the air. Going full electric in vehicles just isn't smart. It's not solving any problems. It's only long term adding to the problem.. just a different way. The planet can't be saved because we as humans are the problem. We are the pollution to a world that's been damaged so bad it's unrepairable. Going electric should not be talked about until you're running every city's homes off of solar and wind. Utilize what you already have instead of reinventing the wheel thinking the grass will be greener. Nobody understands the fundamentals of what going full electric vehicles really means. There's so much more than just saying yep let's go electric. Our vehicles have a hard enough time starting with alternators and batteries as it is and you're saying it's smart to go completely full electric? Let's focus on solar and wind more first before biting off more than we can chew.

Daniel Rainer · Citizen · (Postal Code: unknown) · Mar 12, 2021 11:12 am

 1 Votes

I strongly oppose the proposed regulations. This will hinder all tow vehicles, and pose many new problems for rural residents. It will also make it difficult to maintain current

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vehicles longer, (which is economical and environmentally friendly) and complicate any out-of state purchase of salt-free vehicles, etc.

Kathleen Schuler · Citizen · (Postal Code: unknown) · Mar 12, 2021 12:30 pm

👍 0 Votes

Health Professionals for a Healthy Climate strongly supports Clean Cars Minnesota to protect the health of Minnesotans from air and climate pollution. See our detailed comments, attached.

John Hausladen · Citizen · (Postal Code: unknown) · Mar 12, 2021 12:45 pm

👍 1 Votes

The Minnesota Trucking Association (MTA) submits the attached comments with regards to the Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards Clean Cars Minnesota, Minnesota Rules, chapter 7023; Revisor's ID Number 04626, OAH Docket No. 71-9003-36416 (the "Proposed Rules").

The MTA believes that the Proposed Rules to adopt California's vehicle emission standards set a terrible precedent. The MPCA is using statutory authority granted to it by the Legislature in 1967 to bypass the legislative process effectively allowing California to regulate Minnesota's passenger and medium-duty vehicles. If this is allowed, it is but a short step for the MPCA to soon use same authority to adopt California's inefficient, unnecessary and costly heavy-duty truck regulations. Both are dangerous usurpations of Minnesota's legislative process effectively sidestepping citizen control and input of the things affecting their everyday lives.

Lorraine Bartlett · Citizen · (Postal Code: unknown) · Mar 12, 2021 1:06 pm

👍 2 Votes

I strongly disagree with the implementation of this rule by the MPCA. While it may or may not have merit for vehicle greenhouse gas emissions, a rule of this nature MUST be discussed by the elected State Legislators. The House and Senate members, along with the Governor are elected to deliberate this type of action per the constituents they serve. MPCA is not the proper channel to determine the best interest of Minnesotans. A few public comments does not gather enough public opinion on the matter.

Frank Zimmerman · Citizen · (Postal Code: unknown) · Mar 12, 2021 1:11 pm

👍 1 Votes

This unproven proposal, ID # 4626, has done little to nothing to improve the quality of the air or water in California; why would we expect different results in Minnesota? If this were a good idea don't you think other states would have enacted it long ago? Even if there were a measurable benefit in California, results in Minnesota would be a small fraction based on our size and number of vehicles. If approved this action would have a dramatic negative impact on almost every industry associated with auto manufacturing,

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new car sales, used car sales, car repair and financing, part manufacturing and inventory cost. Its an answer looking for a problem that is not as significate a contributor to our carbon foot print as other industrial pollution. The Carbon Footprint Council stated that any changes made today would take up to 40 years to have a significate impact on the environment. In other word; today we are feeling the impact of actions taken some 30-40 years ago. The Council also stated that food production is actually the largest contributor to our carbon foot print world wide! Minnesota is faced with far greater issues like taxes and the continued loss of our population as it moves to people friendly states with lower taxes and less government looking to control our every move, for our own good, of course.
Vote NO to R4626!

Steve Barthel · Citizen · (Postal Code: unknown) · Mar 12, 2021 1:53 pm

👍 0 Votes

Comments submitted on behave of Dustin Trail (via Representative Peggy Bennett's office)

Sam Benson · Citizen · (Postal Code: unknown) · Mar 12, 2021 2:05 pm

👍 0 Votes

Minnesota Interfaith Power and Light strongly supports the Minnesota Pollution Control Agency's proposed rule to adopt Clean Car Standards

Minnesota Interfaith Power is a grassroots organization that is committed to promoting equity, clean energy, and environmental stewardship in our state. We do this by working with faith communities and people of faith from various backgrounds across our state to advocate for policy changes and to support practical changes in our local communities. Our members are guided by their faith to care for and protect the planet we all share.

As part of our work, we are proud to support the Clean Car MN standards that the Minnesota Pollution Control Agency has put forward. Our members have spoken out clearly in support of the rule, both in writing and through the public comment process. This proposal is a strong step towards improving air quality in our state, reducing greenhouse gas emissions, while also expanding consumer access to electric vehicles.

A 2019 report by the MPCA¹ found that the deaths of 4,000 Minnesotans are attributable to air pollution. By reducing vehicle-based emissions, MPCA's proposed rule can improve the quality of life in our state.

As of 2019, emissions from the transportation sector have now exceeded emissions from electricity generation and are the largest source of emissions in our state². If Minnesota is going to meet its emissions reduction goals and do its part to address the climate crisis, the proposed vehicle emissions standards are one step towards reducing our transportations sector's carbon footprint. By providing consumers with more low emission and zero-emission vehicle options, we can accelerate the transition to a decarbonized transportation sector.

Our members have indicated strong support for Clean Cars Minnesota. Our organization has hosted multiple informational webinars on the topic and we have heard from people across the state who are interested in the prospect of having more choices around

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electric vehicles. We have had over 100 faith leaders sign on indicating support for the rules with an additional 450 of our members submitting comments or signatures in support. These signatures and comments can be found in our attached documents.

Our organization fully supports the MPCA's effort to reduce vehicle emissions in our state and we look forward to the rule being adopted and implemented.

Sam Benson
Policy Associate - Minnesota Interfaith Power and Light

¹<https://www.health.state.mn.us/news/pressrel/2019/air061119.html>

²<https://www.mprnews.org/story/2019/01/05/transportation-agriculture-edge-out-electricity-minnesota-largest-emissions-sources->

Adam Reinhardt · Citizen · (Postal Code: unknown) · Mar 12, 2021 2:19 pm

👍 0 Votes

The Minnesota Center for Environmental Advocacy (MCEA) is a nonprofit organization with almost 50 years of experience using law and science to protect Minnesota's environment and the health of its people.

Attached to this PDF are 354 individual public comments from our members in support of Clean Cars Minnesota Standards collected by MCEA, through an online action, from December 18th 2020 through March 12th 2021.

To protect the privacy of the individuals who submitted comments, only the commenter's full name and comment are included on the spreadsheet.

Adam Reinhardt, Communications Associate - Minnesota Center for Environmental Advocacy

JT McGregor · Citizen · (Postal Code: unknown) · Mar 12, 2021 3:28 pm

👍 2 Votes

I strongly oppose this rule.

These new regulations would increase the cost of cars in Minnesota which harms all Minnesotans, but especially low-income and minority households. These regressive regulations will hurt poor families who desperately need economic stability.

Meanwhile, the rule will produce zero measurable environmental benefits. Using the Obama administration's Clean Power Plan calculations, these rules would avert only 0.000052 degrees C of future global warming by 2100, an amount far too small to measure.

During the recent government-imposed shutdown of Minnesota's economy, which resulted in 40% less traffic, air pollution was actually higher than the previous five-year average. If the stay-home order was unable to produce any environmental benefits, then

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there is simply zero justification for these regulations.

For these reasons, I'm asking the MPCA to withdraw this rule from consideration.

Kim Havey · Citizen · (Postal Code: unknown) · Mar 12, 2021 3:34 pm

👍 0 Votes

Please see the attached document for Comments on behalf of the City of Minneapolis.

Greg O'Leary · Citizen · (Postal Code: unknown) · Mar 12, 2021 3:55 pm

👍 2 Votes

I strongly oppose ANY administrative law, regulation, or legislation that simply aims to copy a California standard. By following this process my rights and the rights of every other resident of Minnesota are being trampled. Issues such as this should be handled through the legislative process or better yet a BALLOT INITIATIVE, then we would see what the people of Minnesota really want.

Response:

Lisa Schreifels · Citizen · (Postal Code: unknown) · Mar 12, 2021 4:56 pm

Federal Policy lets states choose which emission standards to follow, either the EPA's or California's. This oddity exists because California started regulating vehicle emissions before the EPA. So your proposal isn't allowed by law.

Eyal Li · Citizen · (Postal Code: unknown) · Mar 12, 2021 4:11 pm

👍 1 Votes

Please see the attached document for comments on behalf of the scientists and activist supporters of the Union of Concerned Scientists in Minnesota.

Gary Olson · Citizen · (Postal Code: unknown) · Mar 12, 2021 4:17 pm

👍 2 Votes

From what I can tell, the comments mostly relate to either the highly probable increase in cost for personal vehicles (particularly in rural areas), or an overwhelming group of people that believe that anything done to improve the environment is a good thing.

Both groups miss the major point:

The bottom line is that the governor's primary job is to manage the state government, not to arbitrarily pass sweeping new rules that have not been considered and forwarded to him by the state legislature.

This is not an emergency, like the Covid situation, where fast action was needed to prevent serious repercussions. This is something that needs to be carefully considered and not steamrolled into place because the governor's voting base thinks it is a good idea.

I believe that with the advances in the design of "clean" vehicles and better costs, the

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marketplace will make them more popular and more people who can effectively use them will do that. Those that can't will stick to current technology until something more usable comes along.

Don't allow the governor to cram this down our throats.

Gary Olson · Citizen · (Postal Code: unknown) · Mar 12, 2021 4:37 pm

👍 2 Votes

From what I can tell, the comments mostly relate to either the highly probable increase in cost for personal vehicles (particularly in rural areas), or an overwhelming group of people that believe that anything done to improve the environment is a good thing.

Both groups miss the major point:

The bottom line is that the governor's primary job is to manage the state government, not to arbitrarily pass sweeping new rules that have not been considered and forwarded to him by the state legislature.

This is not an emergency, like the Covid situation, where fast action was needed to prevent serious repercussions. This is something that needs to be carefully considered and not steamrolled into place because the governor's voting base thinks it is a good idea.

I believe that with the advances in the design of "clean" vehicles and better costs, the marketplace will make them more popular and more people who can effectively use them will do that. Those that can't will stick to current technology until something more usable comes along.

Don't allow the governor to cram this down our throats.

Response:

Lisa Schreifels · Citizen · (Postal Code: unknown) · Mar 12, 2021 5:03 pm

Federal Policy lets states choose which emission standards to follow, either the EPA's or California's. This oddity exists because California started regulating vehicle emissions before the EPA. Over reaching federal executive branch authority lowered the EPA standards Minnesota had previously adopted. The only way to keep our tailpipe standards were to adopt California's. Yes, I understand this rule also adds the EV sale minimum. But that was already happening in 14 states and we need to capture those sales in Minnesota too.

Jerome Grudem · Citizen · (Postal Code: unknown) · Mar 12, 2021 4:52 pm

👍 3 Votes

My comment is very generic.

Making law on such a subject as this should be done only through the legislature by people we have elected to make laws.

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Stanley Johnson · Citizen · (Postal Code: unknown) · Mar 12, 2021 4:52 pm

👍 3 Votes

I do not agree to or support this proposal. This is yet another example of government way overstepping its bounds. Under no variance should this ever be considered. Gov. Waltz needs to dial back his dictatorship and focus on opening the state back up and hopefully some of the small businesses will still be around to unlock the doors.

Lisa Schreifels · Citizen · (Postal Code: unknown) · Mar 12, 2021 4:54 pm

👍 2 Votes

After closely considering both sides of the proposed Clean Car Rule I support it's passage for the following reasons:

- Electric vehicles are so much easier to find in the 14 states that have adopted this rule. We are losing state jobs and revenue when buyers are shopping in other states.
- Consumers save money with reduced maintenance on electrics and hybrids. We want those electric vehicles for sale in Minnesota and without this rule, manufacturers won't be required to sell them here.
- This rule will reduce greenhouse gas emissions and other air pollution. Cars and light trucks are the largest source of these emissions in Minnesota.
- Manufacturers have flexibility. A formula is used to meet reduced emission requirements. They have a combination of electric vehicles, plug-in hybrids and other ways to increase mpg efficiency to comply.
- GM announced they will be selling electric vehicles exclusively by 2035. Ford is investing heavily in electric. This will go into effect in 2025 which allows business models to adapt.

The Minnesota Rule process is the best way to go with this. Rule changes require measured public input and legislative authority. Surprisingly to me, the federal EPA standards were quickly gutted by the federal executive branch. Our state had only two choices, adopt the lower new EPA standards or California's. For the reasons above, adopting California's makes the most sense. Our state rules are meant to be stable so that industry can operate without worrying about the whims of legislators or overstepping federal executive authority.

Brad Greskowiak · Citizen · (Postal Code: unknown) · Mar 12, 2021 5:01 pm

👍 3 Votes

I oppose this administrative rule. If debated at all, this should be taken up by our legislators, our elected representatives. Our state should not relinquish control or regulation to another legislative body, especially California. Minnesota is not the same as other states and this regulation would be burdensome both to our car dealers and car buyers. Clean cars are coming, that's a fact. Market demand will bring us to where we need to be. There is no reason to impose undue burden and regulation. That only hurts those not economically positioned to afford an EV right now. Simply put, the state does not need to force companies to sell a product that the market is demanding. Minnesota should be allowed to manage under the current Federal guidelines so our car dealerships, employing thousands, can remain competitive in our unique marketplace, climate, and city/rural setting.

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Scott Price · Citizen · (Postal Code: unknown) · Mar 12, 2021 5:13 pm

👍 3 Votes

Once Upon a Time...

Someone said, "Let's recycle. It's good for the environment!" So we did because after all, we ALL want a good place for our kids to live. Fast forward the story to today. We can't get rid of all the plastic because no one will take it. Not us, not China. Noone. So we put our heads down and 'do the right thing," but the plastic sits. And rots. Well sort of.

Once Upon a Time...

Someone said, "Let's make electric cars." They're good for the environment. They don't create carbon emissions. Fast forward to the days when the batteries wear out and the electric parts fail because those things WILL happen. All that garbage will have to go somewhere. But who's going to want it? Not us. Not China. So it will rot. Well, not really. It will end up in landfills and pollute the water supply much the way the chemicals of the mid 20th century did. Think it's far fetched? I don't.

It's so sad to see everyone argue about "facts" that aren't and fallacies that are perpetuated as facts. Recycling being a prime example. Wind power being another. There ARE better ways to work on improving the land we live on, but there's NOT just one way.

Finally, anytime a government agency wants to force the people into a certain path, you can almost guarantee it is not good in the long run. Forced change is never good. At one point, we were treated like adults - free to make choices. Now we're becoming a society of "my group/party/platform/idea/gender/race/you name it knows better than you so 'you must comply.'

If we continue down this road of forced change, you all better get used to the word "comply."

Response:

Lisa Schreifels · Citizen · (Postal Code: unknown) · Mar 12, 2021 6:08 pm

Of course there is not one way to improve the health of our land, water and air. But solutions are needed and passing this rule is part of the solution. I disagree with your premise that a forced path cannot be good in the long run. Seatbelts, airbags, designated smoking areas, and lead-free gasoline were all great changes, Adopting this rule allows Minnesotans to retain the tailpipe emission standards we already had through the EPA. But when the EPA lowered the standards in 2020 we had a choice to keep our standards or go backwards. This is actually staying the course. The amazing thing about the rule making process in Minnesota is that it does allow for public comment and discourse.

12012038 7480 · Citizen · (Postal Code: unknown) · Mar 12, 2021 5:39 pm

👍 3 Votes

Why is this a topic? There is no demand for EV cars. No infrastructure to ensure the consumer is stuck with a car that does not work. The infrastructure cannot be paid for. More money down the black pit of "Public Good"

IF a person wants to buy the car and drive it given the parameters the car requires, good

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for them. I do NOT want to pay for upgrades, so they can enjoy their car more. IF the public demand is there, then it will get built. Just let me drive, what I want and leave me alone. Unless you are willing to subsidize MY demand for transportation!!

Jared LaDuke · Citizen · (Postal Code: unknown) · Mar 12, 2021 5:42 pm

👍 3 Votes

I strongly oppose this rule. I believe the market should stay open and free. If a person wants to buy a hybrid or other fuel efficient vehicle that is their right. If a dealership sees fit to have more or less hybrids on their lot or showroom floor that is their prerogative. Minnesota is not California, we have dramatically different climates and geography. The market and choice of the people should be the deciding factor, not governor walz.

Kent Larson · Citizen · (Postal Code: unknown) · Mar 12, 2021 5:48 pm

👍 2 Votes

The number one source of pollution in this country is from hot air emissions of liberal environmentalist radicals. America has experienced a livable future for over 200 years without electric cars, and despite their "sky is falling" narrative, a livable future is still quite viable without an EV dominance. This "clean energy" push is fueled by the "climate change" warning (formerly known as "global warming" and before that "global cooling") hoax. If either of these past "prophetic" scenarios were true the end of planet earth was at least 10 years ago. So much for that augur of validity. At some point these EV batteries will deteriorate as they age and will their disposal lessen pollution or create a new hazard? I can get twice the miles per fill on my Chevy HHR with an odometer reading 400,000 miles than an EV will ever get in my lifetime. Also I can fully refuel (think "fully recharge") in less than 2 minutes vs. what, 4 hours to fully recharge an EV? Seriously? I fiercely oppose governmental mandates when "of the people, by the people, and for the people" is the jurisdiction to which this nation is bound. My job puts me on the road 5-6 days a week in 3 states so any stat that spews out an "average" for all drivers is irrelevant. Truck drivers are going to need their fossil fuel to keep America's economy rolling. Living in out state Minnesota my air quality is just fine and my breathing ability is great. Minnesota is not California. The "window is closing very rapidly" rhetoric is fear mongering hyperbole. Fossil fuels are an essential ingredient to nourish the lifeblood of this civilization's future. With technological innovations in recent years we have expanded the availability of energy resources to the point of being energy independent under the Trump administration. The trajectory of any government under liberal oversight can only lead to a dismantling of once cherished liberties and that hallowed "pursuit of happiness."

Patrick Stevens · Citizen · (Postal Code: unknown) · Mar 12, 2021 5:57 pm

👍 1 Votes

It is crucial that the Environmental Protection Agency for the State of Minnesota adopt standards that will help slow global human caused climate change. The proposed rule changes will do so. therefore, these rule changes should be put into effect as quickly as possible so that future Minnesotans have a place to live on this planet.

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Kevin Dens · Citizen · (Postal Code: unknown) · Mar 12, 2021 6:02 pm

👍 3 Votes

I am not in favor of the California emissions rule in Minnesota. With the natural move to more efficient and longer range electric vehicles, this will take care of itself with people gradually migrating to those vehicles as they become more readily available and less expensive. It rarely does any good for the government to push mandates like this through without the market being ready for them. As has been noted before, we are Minnesota and not California. Let market forces work and less burdensome regulations and cost for our residents by forcing something like this regulation on us. Those that want this now can choose to pay for it themselves by their choice of vehicles.

Chad Gardner · Citizen · (Postal Code: unknown) · Mar 12, 2021 6:50 pm

👍 2 Votes

As a Minnesota resident I strongly oppose this proposal of added regulations to vehicle emissions. California is not a model for Minnesota, California has much more densely populated cities and has major emissions issues due to those large cities being on the coast and the topography of the state impedes the removal of emissions as prevailing winds attempt to move the pollution east but the mountains keep a majority of those emissions from continuing east enabling dilution and cleansing via natural weather cycles. Minnesota does not have the population nor the topography that makes these emissions at any level approaching a concern. This is just another attempt by government to insert regulations into the lives of free citizens with no prevailing reason to do so.

Carole Joyce · Citizen · (Postal Code: unknown) · Mar 12, 2021 7:18 pm

👍 1 Votes

I support regulations on vehicle emissions. Our environment needs to be protected. it may already be too late, but I would like to invest in the environment on behalf on my grandchildren and all those who follow us.

Bruce Nelson · Citizen · (Postal Code: unknown) · Mar 12, 2021 7:29 pm

👍 2 Votes

I don't think it's a good idea to blindly follow California's rules. Our state has different environmental challenges. We're do we put batteries? What kind of effects does this have on environment? How much mining is done to make batteries and is it less then using fossil fuels? Need more info on unintended consequences.

Gary Clark · Citizen · (Postal Code: unknown) · Mar 12, 2021 7:32 pm

👍 2 Votes

Please do not add 1000 to the price of a new car. I already buy fuel efficient cars. My VW Jetta gets around 48 mpg on the highway. If 1000 is added to the purchase price I very possibly wouldn't be able to afford a new vehicle. My honest opinion is we are not

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California. Have you been to California. It is not a beautiful state it's a waste land with the exception of the north east part of the state. MN can find other ways to incentivize the public into buying electric and fuel efficient vehicles. My question to state leaders is this. If we switch to all electric vehicles where will we get the money to fix our roads and bridges. Will it mean our electric bills go up because you will tax us on that for our roads. Please don't let Minnesota become a far left state. Minnesota is a state of common sense with a middle of the road approach at things. Instead of adding a 1000 to everyone's new vehicle perhaps a rebate for vehicles that achieve or 40 mpg or run on electric. As much as everyone is heading towards electric vehicles it's moving to fast and happening to soon. Please think of all the consequences of your actions.

Paul Blomquist · Citizen · (Postal Code: unknown) · Mar 12, 2021 7:53 pm

👍 1 Votes

I support Governor Walz' decision to adopt the vehicle emissions standards originally set by California and now adopted by 14 other states and D.C. I am a second-generation owner of C & M Ford, Chrysler, Dodge, Jeep, and Ram of Hallock and a first-generation owner of Roseau County Ford in Roseau. I support this decision, because I believe it's right for Minnesota's economy, for Minnesota's citizens, and for Minnesota's future.

Rebecca Olson · Citizen · (Postal Code: unknown) · Mar 12, 2021 8:38 pm

👍 2 Votes

I'm a driving instructor, we use gas efficient cars as it is and passes state inspection yearly. The mileage on those electric cars are horrible (220 miles per charge and hate to see what winter does) takes two hours to charge the thing, a used Tesla from 2015 with 47k miles and they want \$37k for it? Yeah right and this will make my job absolutely impossible and especially during the winter months. Majority of new cars are already compliant with emissions. Instead of forcing the impossible because many cannot afford those electric cars, let the bad cars die/phase out naturally and people will buy what's new. In fact those electric cars have batteries, how are we to power millions of electric cars and expect our power grid to charge every car? I recently bought a newer car and meets every single emission that California demands and I am absolutely disgusted that I will have to give that up? Unreal.

Jeffrey Shoemaker · Citizen · (Postal Code: unknown) · Mar 12, 2021 9:00 pm

👍 3 Votes

I oppose Governor Walz's decision to adopt the vehicle emissions standards originally set by California. I oppose it on grounds that it is an end run around the legislature. On it's face this seems more about being able to say to California "me too!". Whether it actually does something or who and how it impacts seems to be much further down in terms of consideration. This is an issue that should be subject to a rigorous public hearing through the legislative branch. This needs to be thought through taking the current economic dynamics into consideration. And we should not rush this through without careful consideration of the complexities of the issue. More people are working from home and many will not be going back to driving to the office every day. How many is that and what is the effect on reducing carbon emissions? We do not know yet. Does the public understand that the magnets used in electric vehicles come from? They are rare earth materials commonly found in a very certain part of the world. How stable

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is that supply chain? Or how stable is the supply chain for the Lithium batteries used in electric vehicles? I bet very few have even considered it. These are just a couple of issues that people have not even considered. There are plenty more. Let us do our due diligence before knee jerking on this rule change. Let us allow our legislature to have hearings on this so fact finding can be done so we can determine what these rules really mean and whether they are appropriate for Minnesota.

Henry Schreifels · Citizen · (Postal Code: unknown) · Mar 12, 2021 10:22 pm

👍 2 Votes

As a Greater Minnesota resident I strongly support the proposed clean car rule. We are at a tipping point of irreversible climate change. The transition away from fossil fuels needs to happen as rapidly as possible and this is a step in the right direction.

Byron Kuster · Citizen · (Postal Code: unknown) · Mar 12, 2021 10:30 pm

👍 1 Votes

Please pass the MPCA's Clean Car MN rule to help reduce the carbon being introduced into our atmosphere! We need to take real action to reduce the rate of global climate change. This reminds me of the issue over seat belt use many years ago and the argument that seat belts would make cars more expensive. At the time, it was controversial. Now that controversy is hard to understand. It will soon be this way with measures taken to make cars run cleaner. It may cost a bit more, but everyone benefits. Pass the rule!

Response:

Bill Gausman · Citizen · (Postal Code: unknown) · Mar 13, 2021 4:03 pm

Do you understand that there is actually more carbon put in our atmosphere from an electric car? The energy doesn't come from thin air, it comes from a power plant with a smokestack.

Jack Sewpersaud · Citizen · (Postal Code: unknown) · Mar 12, 2021 11:39 pm

👍 1 Votes

I strongly support the proposed Clean Cars Minnesota rule. I believe this rule has the potential to cement Minnesota as the leader in the Midwest for zero-emission vehicle regulations and become the next large market for electric vehicle producers. Some of the potential benefits include thousands of dollars avoided in environmental damages per year, a decrease in the price of zero-emission vehicles over time, and significant progress towards carbon emission reduction goals we set out to achieve in 2005.

Patricia Moulton · Citizen · (Postal Code: unknown) · Mar 13, 2021 7:42 am

👍 3 Votes

Clean Cars Minnesota rule = GREEN all things green are never the issue of environment but CONTROL. Understand that the issue is NEVER the issue. It is like emergency powers CONTROL. To not understand this is to derelict in our duties as citizens. I oppose Clean Cars Minnesota.

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Tom Holford · Citizen · (Postal Code: unknown) · Mar 13, 2021 8:05 am

👍 3 Votes

I strongly oppose Gov. Walz's California Car Mandate. This is just another example of this administration's executive overreach. We are Minnesota not California, and air quality and economic conditions are quite different here. The idea of putting the financial burden on car dealerships to force them make electric available to a public that doesn't want them is wrong. It is inflationary and the burden of this wrong-headed policy will be born by the car buying public. It is estimated the it will increase the cost of all new vehicles purchased in Minnesota by \$1000. If people want to buy an electric car in Minnesota, they already can. The fact is Minnesotans do not want to buy electric cars. Only 1% of cars purchased in Minnesota are all-electric. If this policy is to be considered it must be debated in the legislature in a democratic way.

J.s.n. ex hippie · Citizen · (Postal Code: unknown) · Mar 13, 2021 8:27 am

👍 2 Votes

I oppose this rule. I AM NOT opposed to EV's. In principal, I am neutral on it, BUT:
--The people of MN can decide to buy or not buy. I see many EV's on the road, more than in any other MidWest state I travel in, and the people of MN can decide for themselves.
--The rule must apply to ALL vehicles, including motorcycles and other recreational vehicles, or I will not support it. Some of the most polluting vehicles are not passenger-style.
--I do not own one because they do not fit my family, my budget, or my travelling needs. As EV's continue to evolve, more of them will become attractive to people like me.
--Crawl, walk, run--do not nuke the population with this rule. We will get there and the world will not blow up. However, if we ram through rules such as these, without considering the costs of the entire technology and fallout from alienating future supporters, it will be a loss.

Response:

Lisa Schreifels · Citizen · (Postal Code: unknown) · Mar 14, 2021 6:51 pm

Unfortunately we cannot pick and choose which vehicles this rule applies to. Federal policy only gives us two options. We can pick EPA standards or California's. This is because California started regulating emissions before the EPA. So if you don't support this measure, you support Minnesota staying with the EPA's standards. Those standards were lowered in 2020, which will allow an increase in greenhouse gas emissions from vehicles. 14 states have operated successfully under the California standards. Federal policy has created this conundrum. Please consider supporting this measure so we don't fall further behind on our greenhouse gas emission goals.

Marlys Dunne · Citizen · (Postal Code: unknown) · Mar 13, 2021 8:35 am

👍 3 Votes

I oppose the mandate for two reasons...we are NOT California and our seasons, environment and current climate are not to the levels of CA to require such restrictions. Furthermore, Gov. Waltz is once again violating our rights to allow such decisions to be made by our legislative representatives. When will he learn that we are the voice and decision makers through our elected officials, NOT through him alone or his executive

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staff.

Alex Peterson · Citizen · (Postal Code: unknown) · Mar 13, 2021 9:02 am

👍 3 Votes

I strongly oppose this mandate. Let free markets decide what vehicles dealers want to supply. Central government control over markets has never worked. BTW, allowing comments from anywhere in the world is truly wrong for a Minnesota rulemaking/mandating process. Comments should only be taken from those confirmed to live in Minnesota. Kind of says it all, doesn't it?

Zachary Bodenner · Citizen · (Postal Code: unknown) · Mar 13, 2021 9:12 am

👍 0 Votes

I fully support this rulemaking change. The time for radical energy reform was 20 years, and we need to make what changes we can, as quickly as possible.

Without support from the rest of the energy production industry though, this measure alone will not be enough. Until electricity is generated by a much higher proportion of renewable energy sources, clean electric cars only "clean" in name. We still need greater emissions standards and investiture in electric cars, but it is only a small step.

Curtis Sellman · Citizen · (Postal Code: unknown) · Mar 13, 2021 9:19 am

👍 2 Votes

Please adhere to the federal standards, I oppose this mandate. People are already doing the right thing and I am seeing more EV's on the road every day. Trust in your population and they will not let you down. Free markets and innovation will drive this well.

Alexander Knoll · Citizen · (Postal Code: unknown) · Mar 13, 2021 9:39 am

👍 2 Votes

This is about access to technology. This is about consumer choice. This is about energy and economic efficiency, climate leadership, and the health of those living in our urban areas. I strongly support this measure to govern greenhouse gas emissions and adopt California's LEV and ZEV standards for these and other reasons.

Minnesota is ready; the state's largest utility has reduced carbon emissions by 51% since 2005. Numerous days of the year, the majority of our electricity is generated from wind & nuclear sources, with solar growing at an exponential rate. Our EV charging infrastructure is expanding to where it's now possible to take road trips across the state in EVs using the CCS charging standard. We're ready to embrace a future where our commutes are fueled by in-state renewable resources, not imported "oil" from Canada.

The auto industry is ready. General Motors is committing to having 30 new global electric vehicles by 2025. Electric vehicle technology is rapidly advancing to solve many of the

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concerns shared by the public. For example, heat pumps found in the cheapest Tesla cars greatly improve cold weather efficiency. Lithium Iron Phosphate (LFP) batteries contain zero cobalt or nickel, and have a much longer life cycle (think millions of miles). At the end of an EV's life, I believe we can achieve the 96% battery recycling rate we already do for lead acid batteries. In essence, the technology is here and consumers want it.

For these and many more reasons, I would be thrilled to see Minnesota join other leading states by adopting these rules to help accelerate EV adoption pursuant to California Code of Regulations, title 13, section 1962.2. Furthermore, adopting § 1961.3 levels the playing field by recognizing the external costs of internal combustion vehicles from a greenhouse gas and particulate pollution perspective. Apart from the imminent need to address climate change, this rule is an investment in technology that will help keep the state economically, socially, and technologically competitive.

Kathleen Stephan · Citizen · (Postal Code: unknown) · Mar 13, 2021 12:05 pm
👍 3 Votes

It's quite simple...we are Not California! Our pollution issues do not mirror California. Minnesota is among the cleanest States. This is another ploy to add taxes without representation! Tea party, anyone? Why ask for more government control when there is no consensus of the public? No, no, no more burden of taxes for made up needs disguises. Reduce control...don't add more!

Gregory Swanstrom · Citizen · (Postal Code: unknown) · Mar 13, 2021 12:51 pm
👍 2 Votes

I concur with Kathleen, and would add that while electric vehicles work in a metro area, they are not practical in out state Minnesota. This is an area where distances are measured in 10s of miles not single miles. It can take an hour at 60mph to get to a major town and another to get home. I've owned an electric car and couldn't count on it to make it to the closed town and back on one charge. Charge time was hours not minutes.

Also this should be Legislation that comes from the Legislative branch and not an Executive Order. The people should have input through their representatives, not dictated from the Administrative branch.

Bill Gausman · Citizen · (Postal Code: unknown) · Mar 13, 2021 1:18 pm
👍 2 Votes

California has specific purposes for their regulations, mainly high population density, and frequent temperature inversions which trap and concentrate their smog. In Minnesota, we do not have either of those conditions. Our regulations should reflect our needs, not those of California.

Transportation energy is about 25% of Minnesota's total energy consumption. To add an all-electric vehicle mandate means that we have to increase our generation, and NOT decommission our base load generation like we are doing now, on our way to being more

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like what we saw in Texas this winter.

People need to understand that electric vehicles do not pollute less, they just move that pollution to a smokestack somewhere else. If we need to build 25% more base load generation, and we want it to be clean AND reliable, we had better make it nuclear, and had better start now. They take a long time to build.

If we want vehicle energy to be clean, solar and wind only, we need to be smart about it, otherwise we are setting ourselves up for commonplace disasters like Texas had. How about earmarking the intermittent generation like solar and wind for vehicle charging, and when we have reached the capacity of such generation, shut off the chargers. Size our base load generation to our base load, and leave it alone. Then, if we have excess wind and solar, maybe offer some relief to the base load generation. But it is incredibly foolish to count on an energy source that we know is intermittent to power our critical infrastructure like Texas did.

Lastly, do we really believe that this big expense and inconvenience is going to contribute anything? Isn't it really just a raindrop in the ocean? Seems like a very expensive way to virtue signal.

Dave Nei · Citizen · (Postal Code: unknown) · Mar 13, 2021 2:26 pm

👍 3 Votes

Please work to stop this legislation proposed by Governor Walz to force Minnesota into adopting the California emissions standards program. Our cold weather is not yet compatible with the short battery range of Electric Vehicles.

Please share how much worse the container and private Jets, like Mr Kerry's, pollute the air than our current gas and diesel cars.

When the cars can consistently travel at least 300 miles in the winter, People will buy them because they make sense and are a better value.

Even the electric bus program here in Minnesota is proving to be a bust because the batteries do not yet provide the needed output for winter driving, (documented loss of 40% of battery life with heaters running in the winter.

Also promote the new generation of mini nuclear power plants so we can power the coming wave of electric vehicles. I watch our electric costs raise every year, even though our usage goes down because we are spending so much prematurely on renewal undependable energy sources.

Thank you

Dave Nei

Avery Hildebrand · Citizen · (Postal Code: unknown) · Mar 13, 2021 4:05 pm

👍 0 Votes

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I fully support adopting the Clean Cars Minnesota rules. Climate change is a serious threat to the safety and prosperity of future generations and transportation is one of the single largest sources of climate pollution. Air pollution and smog from tailpipes adversely affects children and some of our most vulnerable populations and contributes to asthma, lung disease, and more. Minnesota should continue to lead by example on these fronts. I'm also concerned to see the amount of confusion and misinformation surrounding this rule. Over a dozen other states besides California have adopted Low Emission Vehicle and/or Zero Emission Vehicle standards, this doesn't force anyone to buy electric, it gives consumers more choice, and sets very achievable emission standards for the industry. Anything that we can do to try and meet our carbon reduction goals set forth by the Minnesota legislature through the bipartisan Next Generation Energy Act is a needed step in the right direction.

Dan Olson · Citizen · (Postal Code: unknown) · Mar 13, 2021 4:08 pm

👍 2 Votes

I'm opposed to a non-elected agency making changes that impact Minnesotans so greatly. These measures should be brought through the legislative process and voted on with a 2/3 majority.

Gas prices will skyrocket if these changes are made, jobs will be lost and Minnesotans will see little or no actual benefit from these arbitrary rules.

Response:

Lisa Schreifels · Citizen · (Postal Code: unknown) · Mar 14, 2021 6:43 pm
Respectfully, Statute 216H.02 Greenhouse Gas Emissions Control has been law since 2007.

David Dudycha · Citizen · (Postal Code: unknown) · Mar 13, 2021 4:50 pm

👍 0 Votes

The Clean Cars Minnesota rule parallels standards in other states requiring two levels of improved customer options- Low Emissions (LEV) and Zero-Emission Vehicle (ZEV) standards

I support this rule because it will allow the MPCA to implement actions that will expand consumer choices and significantly improve the environment and the clean air of all Minnesotans.

The increased availability of EVs at dealerships will increase sales. I currently drive a EV and will be looking at new models this year. I wish to have multiple options and not limited by existing auto dealers reluctance.

Dorle Vawter · Citizen · (Postal Code: unknown) · Mar 13, 2021 4:53 pm

👍 0 Votes

Dear Honorable Judge Palmer-Denig;

I strongly support Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. It is sound policy to join with numerous other

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states and require vehicle manufacturers to expand the range of low- and zero-emission vehicles available for purchase in Minnesota.

Concerns that adopting these standards will threaten and restrict Minnesotans' options to purchase vehicles that meet their needs are unconvincing. Adopting the Clean Cars standards expands purchasing options; it does nothing to limit or restrict vehicle purchasing options.

Our household has been enjoying an electric vehicle for the past three years. Our EV offers remarkable benefits to us as drivers and owners, as well as to Minnesota's beloved environment. We would gladly welcome more EV purchasing options, as well as an enhanced infrastructure to support EV transportation across this great state.

Expanding the variety of electric vehicles available serves multiple exceedingly critical public goals. It helps those Minnesotans who choose to do so, to effectively reduce their carbon footprint, lower their emission of greenhouse gases, improve the quality of the air we breathe and the health of the population, protect against catastrophic changes to our climate, and realize Minnesota's long-held goals to reduce emissions.

Thank you for the opportunity to express my support for the State's effort to adopt these eminently reasonable standards. Many thanks for your consideration.

Linwood Fiala · Citizen · (Postal Code: unknown) · Mar 13, 2021 5:03 pm

👍 1 Votes

The state of Minnesota lacks a safe and affordable means of public transportation. This fact alone shows the world the hypocrisy inherent in this state's government. Neither does Minnesota share California's particular climate conditions which tend to trap, concentrate, and enhance noxious gasses produced by polluters.

The added expense of vehicle ownership will be borne by the wealthy with little adverse effect. Likewise it will be borne by the taxpayer in the case of added expenses incurred by the lower income classes. The people who will be truly hurt by this proposal will be the middle income working class. As usual.

Kathy Schendzielos · Citizen · (Postal Code: unknown) · Mar 13, 2021 5:35 pm

👍 2 Votes

I disagree with this plan. We don't have the infrastructure to support E Vehicles. I don't see charging stations all over MN to be able to go long distances and charge. Without, this cars will only sell in the twin cities and areas where there are charging stations. Also, don't make an issue for the dealerships, If the demand is there, the cars will sell. Obviously the demand isn't there. Probably because we don't have the infrastructure. I couldn't get to the cities and home again therefore, I would not buy an E vehicle.

Eric Yancy · Citizen · (Postal Code: unknown) · Mar 13, 2021 5:42 pm

👍 1 Votes

I am opposed to the rule change.

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Terry Carlson · Citizen · (Postal Code: unknown) · Mar 13, 2021 6:08 pm

👍 2 Votes

The State of Minnesota should NOT adopt the Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards—Clean Cars Minnesota, Minnesota Rules, chapter 7023; Revisor's ID Number 04626.

At this stage, EVs are MORE dangerous than fuel-powered vehicles in accidents, are astronomically more dangerous -- and thus more expensive to repair -- than fuel-powered vehicles, and few dealerships are equipped and trained to safely repair them.

The Green New Deal never seems to mention that.

As to pollution, the materials in EVs are far more toxic to the environment than carbon dioxide -- both to produce and to dispose -- than fuel driven vehicles.

EVs are far more expensive than fuel-driven vehicles -- both to purchase and repair-- leaving middle class and poor people unable to have reliable transportation, particularly those in Greater Minnesota, where they don't have light rail and bicycle hubs to pedal 30 miles to work.

Cars today are clean enough. The people of Minnesota would be better served if the politicians in St. Paul -- notably Gov. Walz -- cleaned up their act and ceased from continually piling impossible financial burdens on the backs of their hardworking constituents.

I am 70 years old and should be retired. Not only does Minnesota tax my Social Security (and other expenses hostile to would-be retirees), but this is a back-breaker.

Like others, I have a mortgage, car loans -- and ever-increasing utility bills (thanks to wind turbines that don't even pay for themselves before they have to be overhauled or replaced) to pay because of wrong-headed ideological elites in St, Paul whose Job No. One seems to be keeping themselves in office and fattening the kitty so that they'll never have to struggle to meet their bills like we have to.

Isn't it time to throw us a bone, if for no other reason, to keep yourselves in office for another term?

Sincerely,

Terry Carlson

Gaye Sorenson · Citizen · (Postal Code: unknown) · Mar 13, 2021 8:34 pm

👍 1 Votes

The air quality has been noticeably worse this winter. It smells like pure car exhaust in my St. Paul neighborhood and the Maplewood park I frequent when the wind is not moving the car exhaust out. I use to only experience this downtown Minneapolis and I'm very concerned. We should all be able to enjoy outdoors every day and not have our long

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and short-term health effected. This is just one of the many appalling things have changed in MN in my 70 years here due to climate change. Why in our uber-capitalist society do we have limited choices in vehicles? Because car dealers aren't interested in selling zero emission vehicles because they see it as risky? Not moving towards zero emission vehicles is the biggest risk. Dealers and car manufacturers need a nudge. Things will happen at a snail's pace without pressure. Selling more low and zero emission vehicles is a relatively easy way to make a big change. Once people know more about electric cars' lower maintenance and fuel costs, and the number of plug-in places goes up, zero emission car sales will soar. 65% are interested all ready. Car dealers will have 2-3 years to adjust to the new rules. We all need to be part of the solution. And big improvements are needed in the next 10 years.

Barbara DeVries · Citizen · (Postal Code: unknown) · Mar 13, 2021 9:32 pm

👍 0 Votes

I am writing in opposition to the Clean Cars Minnesota Initiative. Civics 101 teaches us the constitutional process by which government serves the people. Laws are made by the legislative branch, not the executive branch. Calling it an "initiative" instead of a "bill" doesn't change that fact that the people are being robbed of their voice in the matter through an unconstitutional process.

Minnesota is already suffering from the past year of lockdowns and business closures. Our economy cannot handle this very expensive proposed mandate of paying for all the infrastructure necessary to support the suggested charging stations for electric cars.

Another great concern is that our current power grid is not equipped to supply energy to the proposed charging stations. In Minnesota we already struggle with power outages during the coldest days of winter and the hottest days of summer when electricity usage is highest. Our energy supply needs to be more diversified before the additional power drain is added from charging electric cars.

The batteries used in electric cars are harmful to our environment and to the people who manufacture them. By attempting to be more virtuous by saving the environment with less emissions during the operation of the vehicle, we would actually be doing more harm to the earth and its citizens, because the manufacturing process of the batteries emits more carbon than diesel engines. In comparison a gasoline engine that runs on 10% ethanol is better for the environment. Additionally, in the operating of the electric vehicle more electricity would need to be made to charge said battery on a regular basis. Therefore, more emissions would be produced manufacturing electricity.

The politicians presenting this initiative with such urgency are putting this into the laps of the Minnesota citizens as if the citizens had not fulfilled some promise they made in 2007. In reality it was politicians who proposed these changes and signed them into law in 2007 to reduce emissions by 80% by 2050. Conservation Minnesota claims, "Clean Cars Minnesota will help Minnesota fulfill the promise it made nearly 15 years ago, by getting us back on track to climate leadership." Who made this promise? To whom was this promise made? Once again politicians are using the hard-earned wages of the citizens of Minnesota to pay for goals they set in place that were, perhaps, loftier than they could realistically achieve. There is no proof that electric cars will solve the problem and reduce carbon emissions in our state. In fact, it seems the opposite is true, and electric cars will only increase the emissions load.

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As I understand it, "the adoption of this initiative" would put the state of California in authority over Minnesota's emissions regulations. Let California rule over California. Let the people of Minnesota be free from such rule. More mandates from the governor are not the answer for a better Minnesota.

Ken Pearson · Citizen · (Postal Code: unknown) · Mar 13, 2021 10:44 pm

👍 1 Votes

I strongly support the adoption of the LEV and ZEV rules for a number of reasons. These rules will be very helpful in reducing GHG emissions, fine particulates and other harmful pollutants. Some of the comments in opposition to the rule suggest that climate change is a hoax and that pollution exists only in California. While it would be nice if that were true, it isn't. The big debates on climate science ended years ago because the science has become overwhelmingly clear and the climate changes are increasingly obvious. There is no meaningful debate that particulates and other combustion pollutants are deadly and cause both human suffering and high health costs. It's time to move forward. Bringing cleaner cars to Minnesota will help us do that.

The clean car rules will also result in cost savings for Minnesotans that outweigh any added upfront vehicle costs. Defining "cost" as only the purchase price isn't realistic, and it's unfair to those who want to base their buying decisions on the life cycle costs of their products. EVs are often incorrectly perceived as a luxury product because they were very expensive in the developmental phase. High-end EV models are still being made, but there are also many EVs available today that are already at cost parity with ICE vehicles over the life of the car. Cost parity on the purchase price of EVs and ICEs is expected within the next few years across many vehicle segments (see, e.g., Bloomberg's EV Outlook). The clean car rules will not take away a consumer's right to buy an ICE vehicle even when it is more expensive than an EV, but they give EV buyers significantly more choices for vehicles that are cheaper to own than ICE cars.

It is also frustrating not to be able to easily buy the vehicle that you want when you know it's available in other states. If you wanted an F150 but you had to go to California to get one, you wouldn't be very happy with the availability of your preferred vehicle in Minnesota, and that's the situation for EV buyers. It's also important to understand that it is not a lack of "demand" that results in many EVs not being available here. It would not be fair to say there was no "demand" for F150s in Minnesota if they weren't available for purchase in the state. The fact that sales can't occur when the product is not available does not mean there's no demand. The demand for LEVs and EVs is there and growing in step with society's growing awareness of the costs of climate change and pollution. This has been confirmed by numerous studies and consumer surveys. It's time we made a comprehensive supply of clean cars available to satisfy the increasing consumer demand.

We're moving toward an EV future. GM recently announced an aspirational goal of selling all EVs by 2035. Volvo just announced that it will sell only EVs by 2030. Other manufacturers are setting similar goals. States and countries are also setting phase-out dates for ICE vehicles, generally within one to two decades. Those who prefer ICE vehicles will be able to drive them for years to come, but those who prefer EVs have surprisingly few options in Minnesota. The clean car rules proposed by the MPCA will fix that problem, help address climate change, reduce pollution, improve our health, and save money for Minnesota consumers. That's why I strong favor the adoption of the

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clean car rules.

Kathy Ahlers · Citizen · (Postal Code: unknown) · Mar 14, 2021 4:43 am

👍 0 Votes

I support Clean Cars Minnesota. Beyond the main need to drastically reduce emission of GHGs that are behind climate change, a switch to EVs will simultaneously reduce particulates and ozone emissions that negatively impact human health here in Minnesota. A relative of mine has asthma, so I am especially motivated to press the government of Minnesota for bold policies now to give my loved one a chance to live a long and healthy life.

Christina Ahola · Citizen · (Postal Code: unknown) · Mar 14, 2021 7:52 am

👍 0 Votes

I agree with the proposal. Please approve.

Becca Kellander · Citizen · (Postal Code: unknown) · Mar 14, 2021 9:10 am

👍 0 Votes

I appose this please do not approve!

I oppose this new greenhouse gas emissions standards.

electric cars are more harmful to the environment in the mining of the metals to make the batteries and disposal of them is also toxic. Plus this will have more of a demand on our electrical grid. picture this all Minnesotans come home after work when it's -30 charge their vehicle and need heat for their house during peak times of electrical use further straining the system causing rolling blackouts.

Kyle Foss · Citizen · (Postal Code: unknown) · Mar 14, 2021 9:13 am

👍 0 Votes

I would hope that we can see this as a bigger issue. Government implementing rules versus putting them up for a vote is huge. This is a very controversial subject that absolutely can not be decided by one person.

Hopefully the judge can see how important this issue is based on the comments listed in this section and considers another course of action.

Also, I am unsure why people from out of state (Maine), are allowed in these comments section.

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Angela Smith · Citizen · (Postal Code: unknown) · Mar 14, 2021 11:02 am

👍 2 Votes

I am writing to express my strong support for the proposed Minnesota Pollution Control Agency's Clean Cars Minnesota standards. These standards would help the state make considerable progress in meeting its greenhouse gas emission reduction goals. They would also provide relief from air pollution for communities of color who are overburdened with poor health impacts from the transportation sector and who are least likely to have decent health care to help over their care. I am fortunate to have mostly clean air to breath and to have decent health care, and I want every other person in this state to benefit from these things as well, even if that means that I may have to pay a little extra of my own money to ensure that happens.

As far as how I have been impacted by some of these things, I am a farmer in southeast Minnesota and I have dealt with the effects of climate change firsthand. My farm field has flooded four times in the past five years, thanks to rainfall events showering the land upstream with up to 7.5" of rain in one day. (This is not normal, by the way.) The most recent flood saw my production field under 12 feet of water for three days, completely ruining my crops (and therefore my entire income) for the year. The frequency and severity of these types of weather events have been tied directly to climate change, and while we are probably too late to stop them entirely, we can certainly work to keep things from getting worse by adopting standards like these. I saw comments from other entities arguing that the increased costs associated with adopting these standards was too high, especially during a pandemic, but I do not believe they have taken into account the increased costs of inaction on climate change and air pollution. Yes, vehicles may cost slightly more. However, cleaning up natural disasters on a regular basis, having to find housing and work for people fleeing other areas of the country and the world where it will no longer be possible to live due to climate change impacts, dealing with the northward spread of invasive plants and disease-carrying insects who could not previously survive here, etc. will cost much, much more.

Finally, my family bought a Chevrolet Volt in 2013 and a Chevrolet Bolt in 2019 in order to try and do our part to reduce air pollution and greenhouse gas emissions in our household. While we are happy with our vehicles, the lack of choice that we had in finding an electric vehicle here in Minnesota was frustrating. A number of other manufacturers and models were available in other markets on the east and west coasts and to some extent in Chicago, but there was no way for us to get them here. Why should consumers in California and New York have more purchasing options than people in Minnesota? We should have more choices when it comes to buying electric vehicles; this will likely increase the number of people who would consider buying them and thereby increase the number of those on the road, reducing air and greenhouse gas pollution.

Becky Iverson · Citizen · (Postal Code: unknown) · Mar 14, 2021 11:31 am

👍 0 Votes

I oppose the Clean Cars Minnesota rule. Rules should not be decided on without the right of all Minnesotans to vote. Allowing rules to be decided upon with only a comment submittal in which anyone from any state can comment does not promote views or concerns from Minnesotans. Minnesota's climate does not match California's climate nor

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does it even compare in population density. The damage and climate concerns from battery creation to disposal far out weighs the use of gas powered vehicles. I implore you to please consider allowing Minnesotans to vote on such a large change that will have an economic and financial impact.

Larry Popovich · Citizen · (Postal Code: unknown) · Mar 14, 2021 11:37 am

👍 0 Votes

I oppose Minnesota joining in on California plans of any sort. EV's are available and people can purchase them if they do desire. Do not put more laws, requirements and expense on the backs of Minnesota residents. Economics and market demand will take care of this, not to mention improved battery technology.

Loras Holmberg · Citizen · (Postal Code: unknown) · Mar 14, 2021 11:55 am

👍 0 Votes

I oppose the Minnesota Clean Cars rule. Government is forcing us to buy vehicles that they "ok". I actually would support a carbon tax but that still gives people the freedom to buy what they want. Metro Transit recently decided to purchase no more electric buses because they do not function well. It gets cold here in the winter in case you have not noticed...electric vehicles operate at diminished capacity in winter. The state legislature should be involved.

Mike Iverson · Citizen · (Postal Code: unknown) · Mar 14, 2021 11:56 am

👍 0 Votes

I oppose the clean car Minnesota rule. Enacting more rules and regulations on a state with no comparisons to California does not make economic or financial sense.

Response:

Diana Schleisman · Citizen · (Postal Code: unknown) · Mar 14, 2021 12:37 pm

What evidence do you have that suggests this makes no economic sense? Do you have an alternative suggestion to offer that would benefit our economy as well as protect people and wildlife from pollution? If there were a magical answer I would be thrilled. Until then this is a step in a better direction. It equates to only 2.2% of all car sales since used cars are not affected and comprise 71% of that market.

Michael Van Valkenburg · Citizen · (Postal Code: unknown) · Mar 14, 2021 12:31 pm

👍 2 Votes

I strongly support the MPC rule making process and the rule that they have developed. The majority of US and Minnesota citizens want action to ameliorate the worst effects of unabated climate change. This is one positive mechanism towards that end. I've owned and been happy with an all electric car, the Chef Bolt, for the past year. It works well, summer and winter. One of the reasons I purchased it was to show others that electric cars are nothing to be afraid of. Lets get this done!

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Diana Schleisman · Citizen · (Postal Code: unknown) · Mar 14, 2021 12:39 pm

👍 2 Votes

I support this proposal. We can do better for our economy, our people, and nature on this planet. Using renewable solar energy for chargers can reduce pollution via fewer emissions and also reduce our dependence on foreign oil. This is a win-win-win and I am all for it!

Jerry Ewing · Citizen · (Postal Code: unknown) · Mar 14, 2021 2:23 pm

👍 1 Votes

I am sorry, but the whole point of this rule is to "reduce global warming" and according to the official climate models from the IPCC and US EPA, this rule will reduce global warming somewhere near four ten-thousandth (.0004) of a degree over the next 100 years. It is negligible and immeasurable! There is ZERO scientific justification for this rule!!

Repeat: THERE IS ZERO SCIENTIFIC JUSTIFICATION FOR THIS RULE!

mike hetteen · Citizen · (Postal Code: unknown) · Mar 14, 2021 3:10 pm

👍 1 Votes

I am not in favor of this rule. Minnesota does not have the same climate issues that California does that needs this type of arbitrary action without approval from the legislature. Also, Minnesota climate does not work for electric powered vehicles. In Northern Minnesota a battery operated vehicle in the winter season will only get 50% of available power output. If Minnesota or should I say "the metro area" wants more electric vehicles, then create an incentive for those counties and not punish the rest of the state. Also look at how poorly the electric buses of the Metro Transit have worked for them. Minnesota can take care of it's self and should not give up our rule making to another state.

Scott Olson · Citizen · (Postal Code: unknown) · Mar 14, 2021 3:37 pm

👍 1 Votes

Dear Administrative Law Judge Jessica Palmer-Denig,

I oppose the Minnesota Pollution Control Agency's proposed regulations on vehicle emission standards. I am not opposed to electric vehicles, but I am opposed to laws and regulations that could force these cars on Minnesotans before the state is ready.

These regulations could decrease the availability of cars popular with Minnesotans, while essentially forcing electric vehicles on consumers long before they are practical - or affordable.

I believe strongly that lawmakers should be involved. By going through the administrative rule making process, this administration is circumventing the legislature's input. Neither the mandate nor the method through which your administration is implementing this rule into law are in the best interest of Minnesotans.

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I oppose these regulations and urge the state to significantly amend or scrap them all together.

Sam Seller · Citizen · (Postal Code: unknown) · Mar 14, 2021 3:47 pm

👍 0 Votes

Oppose the California approach to mandating electric vehicle demand. Instead, give incentives to the Minnesota citizens and create Minnesota standards that can replace CA Emissions as the gold standard for the United States.

Response:

Lisa Schreifels · Citizen · (Postal Code: unknown) · Mar 14, 2021 6:38 pm

Federal policy does not allow Minnesota to create our own standards. We can only choose the EPA's or California's. This choice only exists because California started regulating emissions before the EPA. 14 states currently use the California standards. The EPA lowered their standards in 2020. Minnesota committed to reducing greenhouse gas emissions in 2007 with a law signed by Gov. Pawlenty. So to keep consistent with our goals of reducing our greenhouse gas generation, we must adopt the California standards.

Katrina Schleisman · Citizen · (Postal Code: unknown) · Mar 14, 2021 4:15 pm

👍 1 Votes

I strongly support this rule change. In just the last 10 years, the US population has grown by 20 million people, and continues to increase: <https://www.census.gov/popclock/>. I've lived in Minneapolis my whole life and seen the roads get more and more congested in my lifetime. We need to make it easier for residents of MN to make transportation decisions that reduce emissions and greenhouse gases, and this bill is a step in the right direction. No one is being forced to buy an electric car if they don't want to, but this bill will make it easier for those who do.

Teresa Martinson · Citizen · (Postal Code: unknown) · Mar 14, 2021 4:42 pm

👍 0 Votes

Honorable Judge Jessica Palmer-Denig,

Phil & I strongly oppose the creation of a "California Code of Regulations" rule in Minnesota. It is not prudent or lawful for the residents of Minnesota. California's emission restrictions were created because of the topography of the state of California with ocean & mountains trapping gasses in a more populated area without the ability to dissipate, which Minnesota has none of.

The earth's atmosphere requires Carbon dioxide for us to survive, and to call for extreme acts is purely nonfactual or scientifically accurate. Using this fear tactic is incomprehensible.. As our air currently is at about 400 ppm when optimum for plants to thrive is 1600 ppm.. The green movement goal of 150 ppm puts plant life at critical

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levels for survival.

Creating sweeping air quality changes, business & health mandates should ALL be debated by the State Legislature elected by the people of Minnesota. Though Minnesota may be the only divided legislature in the country, that does not mean the process should be ignored to achieve this important policy objective.

We the people, have a right to be part of the decision through our legislative process. We believe by foregoing the required legislative process our state constitution requires, the Minnesota Pollution Control Agency is only aiding more illegal unilateral gubernatorial actions, which are devastating to the people of Minnesota.

Respectfully Submitted,
Life-long Residents,

Philip & Teresa Martinson

Ted Blakley · Citizen · (Postal Code: unknown) · Mar 14, 2021 4:57 pm

👍 0 Votes

Thank you for taking and considering comments from the public.

If this rule is enacted, the California Car Mandate would raise the cost of all new vehicles in MN by \$1,000 or more, reduce consumer choice, and make MN the only state in the Midwest to place burdensome regulations on auto dealerships.

I would assert that not only is this mandate needed but it would have a harmful affect on the state of Minnesota at a time when we are still reeling from the impacts of COVID-19. I would prefer to see incentives given to guide our citizens than using the force of mandates. As electric cars become more affordable, they will become more mainstream although we all know that the energy has to be produced some where. Also, I believe we are going to see the amount of driving permanently reduced as a result of the COVID-19 affect. My employer has had its employees working remote for the last year reducing the daily commute for 99% of the company to zero. Even after COVID-19 is over, we will be allowed to continue to work remote or come into the office infrequently. My employer is not unique in this regard.

My hope is that this mandate will be put to the side. It is simply not needed right now and will cause more harm than good. The desired affect is going to happen on its own as people continue to migrate to electric cars and as a natural result of more people no longer being required to commute to the office daily as before.

LuAnn Fredrickson · Citizen · (Postal Code: unknown) · Mar 14, 2021 5:19 pm

👍 0 Votes

I am opposed to the rules being considered. The 2 goals stated are: Decrease greenhouse gas. Water contributes to 90% of the greenhouse effect. Of the remaining 10% Co2 contributes to roughly 63%. In 2009 the EPA labeled Co2 a pollutant. Increased temperature does not necessary follow increased Co2. <150ppm of Co2 greatly affects the viability of plant life. The second stated goal is to offer more choices. Choices are fine, but without subsidizing the product. The State had a hardy goals of

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switching all their vehicles to Ethanol run vehicles. What did that cost the taxpayer of MN. How much water did it take to make a gallon of ethanol. Where are all those plants today?

Amy Enga · Citizen · (Postal Code: unknown) · Mar 14, 2021 6:17 pm

👍 0 Votes

I am opposed to the Clean Cars Minnesota proposed rule. It does not make sense that this mandate puts an unelected board based in California making decisions about Minnesota.

That Governor Walz is seeking to implement this policy through administrative rule rather than consulting Minnesota Legislature is very concerning. Also, the timing of this mandate is troubling in that it is during a global pandemic.

Topics as complex as this one should be discussed and decided on by the Minnesota Legislature. Discussion by the Minnesota Legislature allows open communication with all residents in a manner that makes it easy to participate in.

Creating barriers to consumer choice violates a free market. If the demand for Electric Vehicles in Minnesota or the incentives to purchase them, is greater than the demand for gas fueled vehicles, the supply will adjust to meet the demand.

A few of the reasons for why I am not currently interested in a 100% Electric Vehicle are the performance degradation in cold temperatures, lack of travel range, time to charge, lack of charging stations, lack of towing capacity and battery replacement cost.

California has one of the more temperate climates in the world. Electric Vehicles are going to perform better in California than they will in -20 Fahrenheit winter temperatures and running the heater will deplete it quicker. When looking at the travel range data of (150-323 miles depending on vehicle model), the data has the disclaimer that it was collected in 60-73 degree Fahrenheit temperatures. Degradation of battery performance in cold weather is listed between 41% (AAA) and 50% (Consumer Reports).

I wouldn't want to road trip in an Electric Vehicle. It has a charge time of 6-12 hours.

Even if a Level 3 fast charging station was available, it would take 30 minutes to recharge and has a risk of overheating the battery possibly effecting its long-term performance and longevity. However, since other midwestern states are not adopting this rule, it is likely to be difficult to locate charging stations for electric vehicles.

Road tripping aside, the somewhat more affordable models (when compared to other Electric Vehicles) would have difficulty making it to my relatives' homes in outstate Minnesota without stopping to recharge along the way. Having a battery die on an outstate rural backroad in a Minnesota winter is dangerous. Members of a board in California are not likely to have experienced this nor will understand it.

Battery replacement costs around \$15,000. Battery life is dependent on the number of recharge cycles. With our colder climate, batteries will deplete faster requiring more recharge cycles which then leads to quicker degradation.

I am against adding burdensome regulations to auto dealerships right after the economic effects of state shutdowns and the pandemic. Also, the higher purchase price of Electric Vehicles puts an unreasonable burden on Minnesota families who are experiencing increased economic stress. I am also against limiting consumer choice through the use of mandates.

There have been statements that mandating electric vehicles is to improve air quality. This is ignoring the impact on air quality and the environment caused by generating more electricity to power these electric vehicles. This includes coal and gas fired power plants, nuclear power plants, wind power and solar power. Coal and gas fired plants are a source of CO2 emissions. Solar panels are difficult to recycle. It isn't that the materials they are made from are hard to recycle; rather, it's that they are constructed from many

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parts all used together in one product. Separating those materials and recycling them each in a unique way is a complex and expensive process. How it should be recycled or disposed of is still in the research stage by the Minnesota Pollution Control Agency. Also, there aren't many options to recycle or trash turbine blades, and what options do exist are expensive (npr.org). If this decision was discussed by the Minnesota Legislature, unintended consequences affecting our environment could be reviewed thoroughly.

Cheryl Ferguson · Citizen · (Postal Code: unknown) · Mar 14, 2021 6:44 pm

👍 1 Votes

It's a wonder why Minnesota residents want to move to South Dakota! Many people I know either have moved or want to move due to the exact nature of this type of regulation. In the 70's and 80's many companies moved across the SD border and that is what is happening now! We don't need this type of "administrative authority" in our state! Adamantly opposed!

CS Hennek · Citizen · (Postal Code: unknown) · Mar 14, 2021 7:53 pm

👍 1 Votes

I oppose the Minnesota Clean Cars Rule. There is a current and growing variety in the EV marketplace available to consumers which negates the need for Minnesota State regulatory intervention. Furthermore, such intervention would serve to stifle innovation in the EV marketplace by legislating compliance and disincentivizing technical improvements in EV technology that is currently brought about by marketplace competition between EV technology and legacy fossil fuel options. EV technology will require significant innovation to meet Environmental improvement goals. The mining of lithium and nickel required to produce one average battery for a current EV vehicle produces a twenty fold carbon footprint over its current fossil fuel counterpart. Also the disposal of solid waste EV batteries remains unresolved. Government intervention stifles EV innovation gained through market competition and directly increases pollution and environmental impact of transportation in Minnesota. Next, if the deciding body embraces the value of democracy and free market than it must acknowledge that Minnesotans can vote with their wallets. If Minnesotans want EVs they can buy them and there is no need to compel them to do so. California's decreasing if not fleeing population should serve as a cautionary tale not a motto to live by. Oppose Minnesota "Clean" cars proposal!

Kathi Gruenhagen · Citizen · (Postal Code: unknown) · Mar 14, 2021 8:32 pm

👍 0 Votes

I am in opposition to the proposed Clean Cars Minnesota and to have it fully removed from ever being a Minnesota rule or statute. Minnesota has been a leader in the past, and Minnesota individuals and businesses need to be provided guidance and accessibility to resource so they can step up and do what is right and affordable for them. The proposal is also somewhat deceptive to the ordinary citizens of a total ban by 2035 on fossil fuel vehicles. This ban cannot be revoked or amended. Without testing, evaluation, and seeing actual factual results, making this type of move is unacceptable.

Something of grave concern to me is the fact that this significant change is being done without full integrity in that it has not been given the typical legislative process. This is

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going to have substantial impact on the citizens of Minnesota and should have been afforded better public scrutiny and for them to voice their opinions to their legislators. I struggled with this process, and it would probably not be out of line to say that there will not be many comments from citizens because of its difficulty. Additionally, now is NOT the time to put something like this in place. People and businesses are still trying to get back to some sense of normal from the impact of COVID-19 and its regulations.

Rebecca Dudley · Citizen · (Postal Code: unknown) · Mar 14, 2021 8:33 pm

👍 0 Votes

I am against this. Anything that the government want to do that involves the word "Standards" is asking for trouble. We are all adults here and hopefully history and experience has proven this to be true. This is not a demand-side issue, but a supply-side issue. When car manufacturers decide to make green cars affordable, people will start to buy them. The issue will solve itself. I care about the environment and drive a Hybrid Toyota. I can afford it. Not every one can. I definately have my thoughts and feelings in regard to auto makers that cannot or will not make an affordable low emissions car. More government control by way of programs like this is not the answer.

Mike Gude · Citizen · (Postal Code: unknown) · Mar 14, 2021 8:46 pm

👍 1 Votes

I support Clean Cars Minnesota because it will help us address several urgent problems.

- We need to dramatically reduce our greenhouse gas emissions to prevent the worst effects of climate change. Cutting carbon emissions from cars and trucks will make a significant contribution to fighting climate change.
- We need to reduce the deaths and health problems caused by pollution. Cars and trucks that pollute less will improve the health of all Minnesotans.
- Our communities of color and low-income households are more exposed to tailpipe emissions than other communities in our state. Minnesota must take strong action to reverse the many ways that these marginalized groups have been harmed, and reducing tailpipe emissions is one way to bring justice to them.

Clean Cars Minnesota will benefit me personally because I plan to buy an electric vehicle in the future, but there are few options available to me right now. Requiring automakers to make more electric vehicles available in this state will give me more choices.

Janie Baker · Citizen · (Postal Code: unknown) · Mar 14, 2021 9:06 pm

👍 0 Votes

We are against energy that is not reliable and expensive. It will not work on a farm and we don't have the power grid to even handle this. Will it even work in 20 below temperatures?? We already have clean energy in our new vehicles with everything they add too stop pollution. We say no to California emissions standards!!!!

Gena Gerard · Citizen · (Postal Code: 55347) · Mar 14, 2021 9:18 pm

👍 1 Votes

I am in favor of the rule change. Our family has been searching for a plug-in hybrid in the Twin Cities, and they are almost completely unavailable to us here. For example, the

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Toyota RAV4 plug-in hybrid, the Honda clarity, the Ford fusion plug-in hybrid, and the Hyundai ioniq are nearly impossible to come by. The plug-in hybrid cars are a good transition when charging infrastructure is limited, because it enables a family to travel without needing to recharge. They serve as great commuter vehicles because they have a decent range to get a person to and from work on electric only. Our house is carbon-free Using the Excel energy wind source program, so our transportation can be zero emission for charging if we have those vehicle options available to us in this state. Our second car is a Nissan leaf, which we charge at home, but a plug-in hybrid to replace our regular gas SUV would give us the option for a longer travel range on road trips. Thank you for your consideration.

JIM ANDERSON · Citizen · (Postal Code: unknown) · Mar 14, 2021 9:35 pm

👍 0 Votes

We are not California and don't need their standards here. We can develop our own as we build infrastructure to handle the need and as the vehicle technology improves to the point that it is a viable alternative to gas and diesel. Batteries need to improve so they are competitive with the driving range of gas and diesel vehicles. The charging technology needs to be fast, not an overnight ordeal. It has to be as fast as the current process to fill a gas/diesel tank. We are nowhere near that point so we shouldn't try to implement California rules here.

Zac Willette · Citizen · (Postal Code: unknown) · Mar 14, 2021 9:45 pm

👍 1 Votes

As a former canoe guide, I strongly support this rule change because of the respectful foundation it lays for the protection of the clean water and air that makes this state so great. Our wilderness needs us to make hard choices for its protection.

As a two-time owner of an electric vehicle (first a Chevy Volt plug-in hybrid, now and Chevy Bolt full EV), I am grateful for the case laid out in the Statement of Need & Reasonableness. This is not knee-jerk policy -- it is well-studied and uses more 'carrot' than 'stick.'

Finally, as a healthcare administrator, I want to highlight that helping people (as others have said, not compelling them) to switch to EVs will reduce the "neurological, cardiovascular, respiratory, reproductive and/or immune system damage" that can come from motor vehicles. Source: <https://www.epa.gov/mobile-source-pollution/research-health-effects-exposure-risk-mobile-source-pollution>

I'm proud of our state for thinking ahead on this one. The Clean Cars Minnesota changes to rule 7023 are ones we will be very glad we made.

Thanks for hearing my voice.

Dawn Bartylla · Citizen · (Postal Code: unknown) · Mar 14, 2021 10:08 pm

👍 3 Votes

I believe the State of Minnesota has a public interest in promoting the use of EVs, as these new rules will benefit Minnesota's economy as well as it's air quality. I have been

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looking for this type of vehicle and they are few and far between in our state. In believe adopting the CA standard will make a positive difference.

Marc x · Citizen · (Postal Code: 55123) · Mar 14, 2021 10:19 pm

👍 0 Votes

I am against California standards for vehicles. I am especially against ZEV and EV requirements. California, ironically, serves as the best example and support for my position. People are leaving the State for other locales that make sense, and work FOR them, not against them. Near as I can tell, an EV is currently the only ZEV on the market, and likely to be be for foreseeable future. I feel ZEV/EVs would be vulnerable to blackouts, other power outages in ways gas, diesel, and other internal combustion drive vehicles are not. This reflects yet another irony. A core element of proposal is to deal effectively with climate change. Yet, the likelihood of power outages, and interference with ZEV/EV operation increases with increase of thunderstorms, fallout of climate change. Lastly, the fluctuations in State and national economy, vicissitudes of parts and energy supply mean an increasing possibility of "point of service" rationing. Looked at from this perspective, ZEV/EV mandates shift yet more power away from the individual to the Gov't, corporations, and banks. Enough already.

Phil Kugler · Citizen · (Postal Code: unknown) · Mar 14, 2021 10:33 pm

👍 0 Votes

I am very much against this. I think the citizens of Minnesota should be able to choose what they drive. We are not California nor do we want to be! The myth about EV technology has been driven by the liberals and the media . Vehicle costs will skyrocket, they will become smaller and much less safe. The emissions to manufacture an EV is higher and the energy to propel the vehicle is just shifted to the power grid so they are not zero emission v hi Les. They are mostly coal powered vehicles. It is ridiculous For a non elected body to make these changes . This is something that should be voted on . This is a non solution for a non problem! Please do not be an oppressive government.

Deb Dornfeld · Citizen · (Postal Code: unknown) · Mar 14, 2021 10:41 pm

👍 2 Votes

I strongly support Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. It is sound policy to join with numerous other states and require vehicle manufacturers to expand the range of low- and zero-emission vehicles available for purchase in Minnesota.

Adopting the Clean Cars standards expands purchasing options; it does nothing to limit or restrict vehicle purchasing options.

Expanding the variety of electric vehicles available serves multiple exceedingly critical public goals. It helps those Minnesotans who choose to do so, to effectively reduce their carbon footprint, lower their emission of greenhouse gases, improve the quality of the air we breathe and the health of the population, protect against catastrophic changes to our climate, and realize Minnesota's long-held goals to reduce emissions.

Federal policy EPA does not allow Minnesota to create our own standards. We can only choose the EPA's or California's. To keep consistent with our goals of reducing our

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greenhouse gas generation, we must adopt the California standards.
Thank you for the opportunity to express my support for the State's effort to adopt these standards.

Carrie Schroeder · Citizen · (Postal Code: unknown) · Mar 14, 2021 10:54 pm

👍 0 Votes

DO NOT SUPPORT!!
MINNESOTA IS NOT CALIFORNIA!

Our land mass is 206,189 Sq miles, theirs is 158,706.

Meanwhile, our population is a mere 5.6 million verses their 39.5 million.

Beyond the Twin Cities, Rochester, and possibly Duluth, the rest of Minnesota is RURAL. Our small town communities do not have technology for internet let alone resources or funding to accommodate city folk in these types of "cars".

Minnesota CANNOT MANDATE CHANGE when 99% of us people living in the land of rocks and cows can barely afford a new, even used, vehicle because our wages are much lower than the city dwellers.

Take a look at Wadena County median income \$35,767 versus Scott County at \$84,571. Naturally, the tax base is much, much lower.

It is unfathomable that anyone could justify squeezing the entire state into one size fits all.

Please open your eyes and have mercy on those of us who do not have the means to pay more when we're making less!!

Nathan Miller · Citizen · (Postal Code: unknown) · Mar 14, 2021 11:17 pm

👍 2 Votes

To the Minnesota Office of Administrative Hearings, regarding Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards—Clean Cars Minnesota.

As Minnesotans, we are proud of the quality of life that we enjoy. Incredible systems came together over the course of the twentieth century to create this incredible quality of life. Economic systems, democratic systems, and technological systems. These systems were built by partnerships between industry, government, and individual citizens. That quality of life is currently under threat. Our quality of life is under threat from the breakdown in trust in our democratic systems. Our quality of life is under threat from the decreasing economic prospects for many. Our quality of life is under threat from the degradation of our natural resources.

I am a citizen of Minnesota who believes that our government programs and regulations need to greatly improve in efficiency, effectiveness, citizen experience, and trust to meet this moment.

To that end, the proposed rules and the process taken to arrive at them seem effective and well done.

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Based on the documents presented, I believe that:
The Minnesota Pollution Control Agency has legal authority to adopt these rules.
The Minnesota Pollution Control Agency is in compliance with legal and procedural requirements.
MNPCA has demonstrated the need for and reasonableness of these rules.

Thank you.

Nikki Krawczyk · Citizen · (Postal Code: unknown) · Mar 14, 2021 11:49 pm

👍 0 Votes

I am opposed to this proposal for a number of reasons.

We cannot compare ourselves to the climate of California and there are weather and other environmental factors to consider here before we implement these changes.

I am all for lower emissions, but we need to have the research completed and a solid infrastructure in place to support the changes before we start passing legislature.

John Harkness · Citizen · (Postal Code: unknown) · Mar 15, 2021 1:03 am

👍 1 Votes

Please adopt the new Clean Cars Minnesota rules. We are dangerously behind in meeting global warming reduction goals. It is time to implement much stronger greenhouse gas emission standards in Minnesota now. Each state must do its part because what we do here affects the whole world. It does not matter which state was the first to create the standards. The future of our children and grandchildren and the survival of the planet is at stake. Clean low cost energy sources that will replace fossil fuels are available right now. For example I quite easily signed up for Xcel Energy's Renewable Connect Program. All my electricity now comes from 100% renewable sources like wind and solar at no extra cost to me. I then purchased 2 new electric vehicles and now all our family's driving is done with 100% clean renewable energy. Electric cars are wonderful, fun to drive, lower in total cost of ownership, and much more reliable than gasoline cars, but the process to obtain them is often more difficult than in other states. Most car shoppers would not go through the trouble I had to obtain the cars I wanted. My eGolf I could not purchase in Minnesota because Volkswagen does not allow their dealers to sell them new here. I had to purchase and ship mine from a California dealership. Mini Cooper dealers are allowed to sell new electric cars in Minnesota, but they have none in stock and do not even bother to stock a demonstrator model to test drive. I had to order and pay for mine sight unseen, and then wait months for it to arrive. If electric cars were available in more dealerships, more Minnesotans would purchase and drive them. By the way, car dealers' argument that they would be stuck with excess inventory is false. This is dependent upon how many cars they choose to order and stock. Requiring them to keep at least one electric vehicle on hand for test drive or for sale would not be a significant burden. At the end of each year dealers have excess inventory for most gasoline engine car models so this is nothing new for them. Transportation is now the #1 source of greenhouse gas emissions. Minnesota should join the rest of the world and the other states that believe in science by taking the actions necessary to slow global warming and protect our

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children's future. Please adopt the Clean Cars Minnesota rules. Thank you for reading my comment.

Karen Kerrigan · Citizen · (Postal Code: unknown) · Mar 15, 2021 9:00 am

👍 0 Votes

Comments are attached regarding small business concerns about the proposed rule, and its impact on small business costs and operations.

Raymond Louwagie · Citizen · (Postal Code: unknown) · Mar 15, 2021 9:10 am

👍 0 Votes

I oppose. The Geographic's and population of MN is totally different than California. Green power is great, and perhaps is sufficient to operate a house off grid. How are you going to run a factory, hospital or entire city on green power? No wind, no power. Solar panels are great, however how about the manufacturing process to produce them? When they have reached their end of life what to do with the panels? We are currently burying used up wind turbine blades in the ground. That makes a lot of sense. Our cars are producing less pollutants than they have in previous years and getting better mileage. Why are we not building new nuclear plants? They are the most reliable and contrary to belief do not pollute when they are producing electric. True, eventually the spent fuel has to be dealt with. But new plants with improvements in technology can overcome safety issues. I find it interesting that people that scream the loudest about pollution and green energy still expect their lights to come on when they need them. Where do they think their energy comes from?

Perhaps Governor Waltz should consider moving to another state and push his liberal viewpoints somewhere else.

Tyler A. · Citizen · (Postal Code: unknown) · Mar 15, 2021 9:17 am

👍 0 Votes

I believe that the clean car initiative has a desirable goal, but I also feel that if passed it would be nothing more than a law that makes a portion of our politicians/citizens feel good about themselves, while not actually doing anything to help our environment; which is why I oppose this rule.

For starters, as with so many rules put forth by our state government, a one size fits all approach rarely has the same impact on those in the metro as the rest of us. I live in the Northern corner of the state and even though EV's may be becoming more common in the metro area, they have yet to find a following up here. A search online tells me the nearest public-use EV charging stations to my location and to the thousands of people that live in the northern tier of the state are as much as a 2 hour drive. When I read the miles per charge estimations for some of these EV's, I'm not sure we could even make it that far on a cold winter day. For this reason alone, until the charging station availability is significantly more widespread, nobody should expect our dealerships to carry these vehicles that will almost certainly never sell.

I'm not trying to say we in greater Minnesota see no need for environmentally friendly

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improvements, however I think this problem needs to be tackled from the beginning of the energy production process, not at its end user (the vehicle). For the sake of argument lets pretend the infrastructure was there and we can charge up anywhere we go. If we replaced even a fraction of our vehicles with EV's, what would happen to the energy grid as it currently operates? We'd be adding millions of kWh of demand to a grid that already is prone to failure when over used. That is why power companies incentivise 'off-peak' and 'ripple' electrical current options that allow them to shut off current to certain individuals/properties during periods of high usage in an attempt to eliminate these failures. The added demand of EV's would certainly cause a real strain on the grid system. So what's the answer to this problem? I think this is the question that needs to be answered before vehicle mandates be considered.

Of course we would need more electricity, the problem is, for most of Minnesota, the most widely used creator of electricity is coal, and we all know what environmentalists think about coal. If we replace our gas/diesel vehicles with EV's, what we are also doing is creating more demand for a hated fossil fuel. This is obviously a conflict of interest. I realize renewables are gaining ground in energy production, however their dependability and cost effectiveness has yet to outdo their fossil fuel counterparts. Right now the US flares off immense amounts of natural gas which could be utilized for energy production. It's getting burned anyway so we could just as well make use of it and it would be a step up from coal. Propane, which is a by-product in the extraction of natural gas and oil, is also an underutilized resource that should be considered. It's already widely available, and it is a totally green fuel. Environmentally it's non-hazardous. Not many people know that it's relatively simple to convert almost any vehicle to run on propane, and there are a number of vehicles out there that already do. The US exports vast amounts of it that could be utilized here to make the vehicles we already have cleaner until the renewables technology and power grid have advanced to keep up with the demand of a mostly EV fleet.

As I write, only 512 comments are on this thread. The population of MN is about 5.6 million. 512/5.6 million is 0.0000914. To make a decision for the entire state with such a minimal piece of the population is absolutely unfair. This issue has not been well publicized in the media and many people have no idea where to voice their concerns. And, why are people from other states commenting on here? Minnesotans deserve for this to, at the very minimum, go through legislation.

I believe there are reasonable ways to clean our environment in ways that don't burden certain populations or hinder progress, but this initiative looks like a naive attempt by a group of people. I am firmly against how this rule is structured and being pushed through. Please abandon this rule.

Timothy Rudnicki · Citizen · (Postal Code: unknown) · Mar 15, 2021 9:44 am

 0 Votes

Please see the attached file for a detailed statement of some legal issues, an analysis of technical matters and recommendations for amendments to make the LEV portion of the rule effective so as to fulfill the intended purpose of the rule. Submitted on behalf of the Minnesota Bio-Fuels Association.

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Anjali Bains · Citizen · (Postal Code: unknown) · Mar 15, 2021 10:05 am

👍 0 Votes

Hi there, I am the Senior Clean Transportation Manager at Fresh Energy (and also a resident of Saint Paul), and I'm submitting the written version of remarks I gave at the public hearing on February 23. More written comments will follow. Thank you!

NESCAUM Admin · Citizen · (Postal Code: unknown) · Mar 15, 2021 10:19 am

👍 0 Votes

Attached please find comments submitted by Northeast States for Coordinated Air Use Management (NESCAUM) regarding: Clean Cars Minnesota Rulemaking, OAH Docket No. 71-9003-36416.

Josue Aguilar · Citizen · (Postal Code: unknown) · Mar 15, 2021 10:27 am

👍 1 Votes

Dear Minnesota Pollution Control Agency,
Please accept these 412 public comments from members and online activists of the Natural Resources Defense Council (NRDC) in support of strong clean car standards for Minnesota.

Minnesota is already feeling the effects of climate change firsthand. Winters are warming, and extreme weather is becoming more frequent, which is threatening the health and wellbeing of urban and rural communities alike.

But these new clean car standards would help fight climate change by increasing Minnesota residents' access to cleaner vehicles while helping the state continue the vital task of improving our air quality. Dangerous air pollution caused by the transportation sector is a burden that falls disproportionately on low-income communities and those of color.

But these new standards will benefit public health and save new vehicle purchasers an average of \$1,600 over the life of their vehicle. That's why we support Minnesota adopting advanced clean car standards that will help fight climate change, improve air quality, save Minnesotans money, and expand our clean energy economy.

We urge you to support the strongest possible Minnesota Clean Cars program and to reject provisions by industry lobbyists that would significantly weaken the number of electric vehicles brought to the state.

Please help ensure that the state moves quickly to adopt these critical standards.

Thank you so much for your time.

Best,
Josue

Todd Carroll · Citizen · (Postal Code: unknown) · Mar 15, 2021 10:32 am

👍 1 Votes

I strongly support this rule change. Many of these changes have been needed and supporting a stronger environmental policy can have a higher cost up front, it can also have lower costs in the future. We tend to look at what is happening now, will current

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jobs be lost, how does this affect "me"? While this is important, there should be other considerations also made, like what types of jobs will these new rules support? Do they pay better than the current jobs? Is there demand, but because we don't have the network, does it just look like people only want trucks/SUV's?

Life is constantly moving. We can either be stuck in the past or be part of the new solution, and have a voice in how this technology evolves in our state.

Katie Izzo · Citizen · (Postal Code: unknown) · Mar 15, 2021 10:42 am

👍 0 Votes

Please see attached file for the MPCA's second preliminary response to comments. This document will also be placed on the MPCA's Clean Cars Minnesota rulemaking page at <https://www.pca.state.mn.us/air/clean-cars-mn-rulemaking> as soon as possible.

Chris Meyer · Citizen · (Postal Code: unknown) · Mar 15, 2021 10:51 am

👍 0 Votes

Trying to be like California is absurd!! These type of regulations affect the poorest people in the state. Most poor people can't afford a new car to pass emissions. They live on a fixed income and can barely afford to fix the car they have! Quit targeting poor people oh wait are you going to give them all new cars for votes? Is that what is happening here? You politicians should actually focus on things that matter like jobs and how to keep cities like Minneapolis from burning down!

ERIK LUNDSTROM · Citizen · (Postal Code: unknown) · Mar 15, 2021 10:56 am

👍 0 Votes

I strongly support the adoption of California's emission standards. See attached document for my supporting arguments.

Derek Kelley · Citizen · (Postal Code: unknown) · Mar 15, 2021 10:57 am

👍 0 Votes

Attached are my opinions on the proposed rule changes.

Pippin Brehler · Citizen · (Postal Code: unknown) · Mar 15, 2021 11:15 am

👍 0 Votes

Please see attached.

Mike Litzau · Citizen · (Postal Code: unknown) · Mar 15, 2021 11:38 am

👍 0 Votes

We should not try to copy California in anything they do. Since Minnesota is separate let's make our own standards and have a plan put together that benefits Minnesota. Minnesota has very different wether than California along with different landscapes let California do them and we do something else. I do not own an

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EV I have considered them for my wife and I know people that own hybrids that are very happy with them. I drive a lot of pick up truck and pull heavy loads I don't want anything to do with emissions of all the vehicles and equipment we own our biggest repairs and reliability issues are from DPF and DEF systems. No thanks on trying to add more emissions.

I do think there is a market for more emission friendly vehicles but we should not do what California does let's come up with something that says we still like Minnesota.

Thomas Kingston · Citizen · (Postal Code: unknown) · Mar 15, 2021 11:45 am

👍 1 Votes

To: Honorable Jessica Palmer-Denig

Re: MPCA's Rulemaking: Clean Cars Minnesota [Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards—Clean Cars Minnesota, Minnesota Rules, chapter 7023; Revisor's ID Number 04626, OAH docket number 71-9003-36416]

I am writing to express my support for the MPCA's proposed rule for Clean Cars Minnesota. To inform myself, I attended information meetings, the recent hearings of February 22-23, 2021, and viewed the various video presentations. I read multiple documents, ranging from "Notice of intent to adopt rule with a hearing" to the "SONAR addendum". It is clear to me that the MPCA has addressed the issues regarding their legal authority, followed the legal procedural requirements, and fully articulated the needs and reasonableness regarding this proposed rule.

Thank you for considering my comments.

Tom Kingston, Fergus Falls, MN

Todd Hay · Citizen · (Postal Code: unknown) · Mar 15, 2021 11:51 am

👍 0 Votes

We are Minnesota, not California. If we want to create a Rule or Law which pertains to our way of life than work with our Legislatures to create a bill Minnesotans have been able to provide input. Do not COPY another State (especially California) and rubber stamp what they do.

I agree we need to make electric vehicles more available to all Minnesotans but we need to do it in a business friendly way and not Dictate business practices for private businesses. If the State Government wants to have all electric vehicles, then proceed down that path but do not require all Minnesotans to have to conform. In the rural areas, bio-fuel hybrids would be a better path to use a renewable fuel and the benefit of the electric for in town short trips.

Jon Hunter · Citizen · (Postal Code: unknown) · Mar 15, 2021 11:54 am

👍 0 Votes

Attached are comments submitted on behalf of American Lung Association in Minnesota, Health Professionals for a Healthy Climate, Health Students for a Healthy Climate, and Minnesota Public Health Association.

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Karl Ramey · Citizen · (Postal Code: unknown) · Mar 15, 2021 12:04 pm

👍 0 Votes

I also am opposed to this proposed rule for many of the reasons listed previously. While I am in favor of clean air, etc. this needs to be done with the legislature involved. A new law such as this with this much impact on the people of this state needs to have the process done the way it was intended, not from one single agency or one branch of government.

Janell Miersch · Citizen · (Postal Code: unknown) · Mar 15, 2021 12:08 pm

👍 1 Votes

I live in rural Minnesota and own a hybrid car that I bought in the Twin Cities. I believe we all need choices regarding which vehicle we want to own. I am also alarmed at the rate of climate change and realize that incremental changes in human use of fossil fuels will result in not only cleaner air but a small and NECESSARY change in our accelerating rate of climate change. I think the passage of this rule will allow choices.

Bruce Larson · Citizen · (Postal Code: unknown) · Mar 15, 2021 12:10 pm

👍 0 Votes

I very strongly oppose proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards—Clean Cars Minnesota, Minnesota Rules, chapter 7023; Revisor's ID Number 04626

- The California stds. should NOT be applied to Mn. We simply do not have the same density of population as California.

- if we were to adopt such legislation it should be via federal legislation & all states should be the same.

- This rule now would cause a very wasteful phase out of our current vehicles and impose an extra cost burden on mn families who can not afford it.

Let free market capitalism drive what cars can be sold in MN. When the manufacturers get those cars desirable and efficient they will be implemented.

Again I and my entire family, strongly oppose adopting any vehicle emissions developed for California to be applied to Minnesota.

Benjamin Stafford · Citizen · (Postal Code: unknown) · Mar 15, 2021 12:19 pm

👍 0 Votes

Comments submitted on behalf of Clean Energy Economy Minnesota by Benjamin Stafford, Director of Government Affairs

Dean Sammon · Citizen · (Postal Code: unknown) · Mar 15, 2021 12:22 pm

👍 0 Votes

I would like to go on record opposing the proposed revisions to Statute 7023 regarding Clean Cars Minnesota. These revisions should be adopted through the legislative process and associated hearings. This issue is important to all people in Minnesota and they should be given the opportunity for input through their elected representatives.

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Kevin Kahler · Citizen · (Postal Code: unknown) · Mar 15, 2021 12:23 pm

👍 0 Votes

Strongly against this new rule. Minnesota is not California and nobody had thought to how this all works out in reality. Higher costs for gasoline, uncertainty about electric cars such as battery mfg, foreign labor mining some of these materials and how it applies to out state mn where there is not same problems. Mr Walz is going around our legislature to do this under his Covid powers. This has nothing to do with covid and should go thru legislature so that all Mn has a voice. I have some friends that worked for a major energy supplier to California and their system is very inefficient because they have own standards which makes fuel delivery very expensive. I don't think this rule is in best interest of Minnesota until more study and input is done.

Liz Deering · Citizen · (Postal Code: unknown) · Mar 15, 2021 12:30 pm

👍 1 Votes

Conservation Minnesota works to protect the Minnesota we all love. We support the Clean Cars Minnesota rule as it's an important step to address our largest source of climate pollution and improve the air all Minnesota breathe. During the public comment period, we asked our members to sign their names in support of the following statement or create their own message. Attached are two documents, one listing the 1,783 supporters who signed on in support of the statement below and a second file with individual comments.

"I support the Clean Cars Minnesota Rule. By adopting these standards, Minnesota would join 14 other states and the District of Columbia in reducing vehicle emissions and increasing consumer access to electric vehicles. Transportation now accounts for the largest source of climate change-causing pollution in our state, and these standards are an important step in helping us reach existing emissions reduction goals."

Laurie Resch · Citizen · (Postal Code: unknown) · Mar 15, 2021 12:35 pm

👍 1 Votes

Honorable Judge Jessica Palmer-Denig

I am writing in support of the Clean Cars MN rule. I support both key areas of focus addressed by the rule, the reduction of greenhouse gas emissions and increased consumer choice for electric and vehicles. Since transportation is the largest contributor to greenhouse gases and personal light and medium duty vehicles contribute half of the emissions, this rule will move MN closer to the goals set in the bipartisan Goals 2007 Next Generation Act, signed by Governor Pawlenty. I want my children and grandchild to experience the wonders of Minnesota's natural beauty and have clean air to breath. Beyond my concern for my own family I believe each of us a responsibility to be good stewards of the environment.

Please consider my comments as you make a decision regarding this rule.

Sincerely,
Laurie J. Resch, EdD

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Stacy Anderson · Citizen · (Postal Code: unknown) · Mar 15, 2021 12:44 pm

👍 1 Votes

I strongly oppose the MN Clean Car rule. First, Walz should not be making rules bypassing the legislators. Second, cobalt for these cars isn't mined ethically; the mining process is using a new generation of slave labor in Africa. People who have the means to purchase EV can,, but most do not have the financial resources to buy these cars. It is wrong to force families to sacrifice more money and time to purchase vehicles that don't make sense to use in our climate.

<https://www.bloomberg.com/news/articles/2021-03-13/electric-cars-will-cost-more-using-ethically-sourced-batteries>

Roxanne Hillard · Citizen · (Postal Code: unknown) · Mar 15, 2021 12:54 pm

👍 1 Votes

I strongly oppose this new rule. The Governor is seeking to implement this policy through administrative rule, rather than the legislature. If enacted, the California Car Mandate would raise the cost of all new vehicles for Minnesota families by \$1,000 or more, reduce consumer choice, and make MN the only state in the Midwest to place burdensome regulations on auto dealerships.

I have been to California and the smog is horrific. This mandate puts an unelected board based in California in charge of Minnesota's auto standards. Minnesota is not California and we have much cleaner air than the Golden State. Furthermore, electric vehicle sales only make up 1% of all auto sales in MN compared to 6% in CA. Allowing a body thousands of miles away to make decisions about Minnesota makes no sense. What would be the governor's reason for going around the legislature and when does what is best for Minnesota come into play? Make Minnesota a priority based on studies and input not a copy based on another state. Apples too Apples.

SUSAN TOMTE · Citizen · (Postal Code: unknown) · Mar 15, 2021 12:55 pm

👍 0 Votes

I oppose the MPCA rule-making proposal to adopt the California Air Resources Board LEV and ZEV standards through the Clean Cars Minnesota initiative.

This type of mandate would best be addressed in a legislative session and not a rule-making action. I would prefer to see this type of proposal debated in our Legislative branches so the representatives we elect can be the voice of the communities they serve. Many Minnesotans are not even aware of this proposal or the economic and tax impact that would occur in their communities. The ramifications to the rural communities need to be discussed and addressed. Must the transition to EV be mandated by state government? Beyond just the commuter vehicles - the infrastructure and support required to make the transitions to EVs need to be in place especially in remote/rural areas. Small communities' budgets are limited and replacing, updating, renewing county, city and municipal vehicles will be a tremendous burden and must be considered and discussed.

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The method that the MPCA and our State government is taking to mandate this initiative effectively by-passes the legislature and the legislative process, and that is of considerable concern to me.

STEPHEN DAVIS · Citizen · (Postal Code: unknown) · Mar 15, 2021 12:57 pm

👍 0 Votes

I strongly oppose this rule. My concern is with 7023.0250 Subpart 2. Exceptions A. and B. (used vehicles and vehicles sold to another dealer).

I am a Full Professor, Ph.D. qualified Economist, with teaching and research experience at both the University of Minnesota and Minnesota State Universities. I was a founding board member and treasurer of one of the Minnesota Regional Sustainable Development Partnerships. I have been a paid consultant for Xcel Energy in helping them meet their alternative energy goals.

As an economist, I say adopting the California Standards will not address our unique environmental needs and opportunities. We have much colder weather, a far greater supply of Ethanol, Bio-diesel and similar low and zero emission fuels, and a very different transportation infrastructure than California or most of the "California Standard" States. This rule will unambiguously increase the cost of new vehicles sold in Minnesota, because it is an unfunded mandate on new car dealers. Used cars, and cars purchased (and possibly licensed) in other states are close substitutes for new vehicles sold in Minnesota. As a result of this rule, more Minnesotans will be driving older, used cars, often originally sold in other states. The Minnesota vehicle fleet, as a whole, will be older, emit MORE pollution (as is true of older vehicles generally) and provide fewer environmental benefits than if this rule is delayed and reviewed further.

Minnesota, instead, should CONTINUE TO adopt standards relevant to Minnesota's sustainable development goals, especially biofuels, which can continue to make a far greater impact on air quality and the health of Minnesotans. Instead of harming Minnesota vehicle dealers and the vast majority of car buyers, this would also help Minnesota farmers. I would be happy to serve as Principal Investigator on research quantifying these results upon request.

Mark Landes · Citizen · (Postal Code: unknown) · Mar 15, 2021 12:57 pm

👍 0 Votes

I DO NOT support adoption of the Clean Cars Minnesota proposal. This rule is little more than a shell game for virtue signalers. Here are a few points that illustrate this fact:

- China controls the majority of the world's lithium mining, including mines in Afghanistan.
- American soldiers protect China's mining interests and infrastructure in Afghanistan.
- The manufacture of a ZEV produces a carbon footprint magnitudes larger than a gas car.
- The majority of electricity in Minnesota is produced by coal-fired plants.
- The electric power transmission line loss to charging stations is not factored into the equation.
- Electricity production capacity would have to be increased to meet demand. A new coal-fired plant?
- "Free electricity" from charging stations is paid for by taxpayers who most likely don't own a ZEV.

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- A "ZEV" is NOT zero emissions when auto manufacturing and power generation are factored in.

To everyone who supports this initiative and/or owns an electric car: Just remember that every time you put on the clean white gloves to charge your car: you are using electricity generated with gas/ coal/nuclear (wind & solar negligible) brought to your charging station at a transmission loss, with lithium twice purchased from China with US Dollars AND the blood of American soldiers.

NATHAN JOHNSON · Citizen · (Postal Code: unknown) · Mar 15, 2021 1:00 pm

👍 0 Votes

I think it is ridiculous to adopt anything that is written in another state with a completely different weather climate and completely different industries. It is obvious that there is a demand for more EVs so why not let our state legislators come up with something that will work for all of MN. There is so much industry, mining and farming going on in rural MN when the temps are -20 that by enforcing CA laws on those industries could be devastating to our states economy. I think we need to use common sense and take our time coming up with something that will work for all of our state and will not effect the businesses that we need for our economy.

Stuart Frazier · Citizen · (Postal Code: unknown) · Mar 15, 2021 1:09 pm

👍 0 Votes

I oppose the MN Clean Car rule for a number of reasons. Point one is that as this will affect all of Minnesota this is an issue for the legislature to consider, not a rule to be enacted by adoption by an agency. While I understand that Minnesotans can make comments through this portal, it is not as open and honest as speaking with a representative or senator. I do not see that due process and consensus building has occurred. Secondly, as I read through the comments, specifically those from the 22nd and 23rd of February, many of the comments voice a frustration of Minnesotans not being able to find electric vehicles for sale. Adoption of the Clean Car Rule is not the correct means to make those cars available to Minnesotans, as the effect of the rule has other consequences. Looking at the average age of cars in the U.S. (11.9 years CNBC 7-28-2020) shows that many older cars are on the road. I believe many of these are "clunkers" that economically challenged people can afford. I question if consideration has been given concerning the effects on Minnesotans struggling economically.

Skip Foster · Citizen · (Postal Code: unknown) · Mar 15, 2021 1:14 pm

👍 1 Votes

I oppose adopting the California emissions standards for Minnesota.

We in Minnesota have a different climate and different Social and Economic conditions than California, we must protect these for all Minnesotans.

We need input from all sectors in Minnesota to accomplish and protect this. Business,

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law enforcement, auto dealers, trucking and all transportation sectors, to name a few, need to be a part of this rulemaking.

Since CARB in California, freight rates to and from California have increased 12 to 15% depending on location. Not only has the increase in equipment cost, but equally important the number of trucks and carriers that have discontinued service to California because of this rule has lowered supply with equal or increased demand and therefore increased cost. There is only one place to pass this increase on to, the ultimate user, you and I!

I do not believe we can take this quick shortcut merely to supply a policy. We need to utilize all Minnesotans to protect the future for us. As a Grandfather, I certainly want a clean environment, but also a job climate that protects and establishes all working classes in the future.

This needs to go through the established legislative process to protect all of us in Minnesota!

Madi Johnson · Citizen · (Postal Code: unknown) · Mar 15, 2021 1:34 pm

👍 2 Votes

The following names are individuals connected to MN350, a grassroots organization with a base of 40,000. The MN350 Clean Transportation Team is a team of 50 dedicated Minnesotans who volunteer their time to organize for transportation-related climate solutions in Minnesota. The team has been working for nearly a year to increase public awareness of Clean Car Standards, through informational events, engaging with rulemaking and the legislature, and having conversations with Minnesotans. Through these conversations, over 1300 individuals have signed petitions or written comments in support of Clean Cars Minnesota. Their names are comments are attached.

Attached are the comments & petition signers from MN350 supporters.

Madi Johnson · Citizen · (Postal Code: unknown) · Mar 15, 2021 1:38 pm

👍 1 Votes

MN350 is strongly in favor of adopting Clean Car Standards. Our letter is attached.

Dave Ladd · Citizen · (Postal Code: unknown) · Mar 15, 2021 1:50 pm

👍 0 Votes

We appreciate the opportunity to provide comments regarding the Minnesota Pollution Control Agency's proposed Clean Cars Rule, in particular the potential impacts it could have on rural Minnesota and the infrastructure of the re-emerging industrial hemp sector.

David Aafedt · Citizen · (Postal Code: unknown) · Mar 15, 2021 2:02 pm

👍 0 Votes

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Alliance for Automotive Innovation's Rulemaking Comments and Legal Memorandum attached hereto.

JoAnn Sternberg · Citizen · (Postal Code: unknown) · Mar 15, 2021 2:03 pm

👍 2 Votes

Governor Walz should not have done this without going through the legislature. It will not work in MN with longer distances to drive and no place to charge, or if battery fails. If Biden hadn't reversed everything we would not be dependent on foreign countries for oil. The way they process oil is not as clean as the way the US processes oil, so there are more emissions. Also, we should NOT be using California as example. They want to only produce electric cars in the future!. This report from Institute for Energy Research on impact of lithium batteries, etc., shows China is the one who will benefit and they are one of worst polluters. Also, the process used to mine the lithium and cobalt is causing toxic materials put back into ground polluting the rivers, etc. See below from November 2020.

"During the Obama-Biden administration, hydraulic fracturing was accused of causing a number of environmental problems—faucets on fire, contamination of drinking water, etc.—but the administration's own Environmental Protection Agency could not validate those accusations. Now Biden is planning to transition the transportation sector to electric vehicles that are powered by lithium batteries and require other critical metals where China dominates the market. Mining and processing of lithium, however, turns out to be far more environmentally harmful than what turned out to be the unfounded issues with fracking.

In May 2016, dead fish were found in the waters of the Liqi River, where a toxic chemical leaked from the Ganzizhou Rongda Lithium mine. Cow and yak carcasses were also found floating downstream, dead from drinking contaminated water. It was the third incident in seven years due to a sharp increase in mining activity, including operations run by China's BYD, one of the world's biggest supplier of lithium-ion batteries. After the second incident in 2013, officials closed the mine, but fish started dying again when it reopened in April 2016.

Lithium prices doubled between 2016 and 2018 due to exponentially increasing demand. The lithium ion battery industry is expected to grow from 100 gigawatt hours of annual production in 2017 to almost 800 gigawatt hours in 2027. Part of that phenomenal demand increase dates back to 2015 when the Chinese government announced a huge push towards electric vehicles in its 13th Five Year Plan. The battery of a Tesla Model S, for example, has about 12 kilograms of lithium in it; grid storage needed to help balance renewable energy would need a lot more lithium given the size of the battery required.

Processing of Lithium Ore

The lithium extraction process uses a lot of water—approximately 500,000 gallons per metric ton of lithium. To extract lithium, miners drill a hole in salt flats and pump salty, mineral-rich brine to the surface. After several months the water evaporates, leaving a mixture of manganese, potassium, borax and lithium salts which is then filtered and placed into another evaporation pool. After between 12 and 18 months of this process, the mixture is filtered sufficiently that lithium carbonate can be extracted.

South America's Lithium Triangle, which covers parts of Argentina, Bolivia and Chile,

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holds more than half the world's supply of the metal beneath its salt flats. But it is also one of the driest places on earth. In Chile's Salar de Atacama, mining activities consumed 65 percent of the region's water, which is having a large impact on local farmers to the point that some communities have to get water elsewhere.

As in Tibet, there is the potential for toxic chemicals to leak from the evaporation pools into the water supply including hydrochloric acid, which is used in the processing of lithium, and waste products that are filtered out of the brine. In Australia and North America, lithium is mined from rock using chemicals to extract it into a useful form. In Nevada, researchers found impacts on fish as far as 150 miles downstream from a lithium processing operation.

Lithium extraction harms the soil and causes air contamination. In Argentina's Salar de Hombre Muerto, residents believe that lithium operations contaminated streams used by humans and livestock and for crop irrigation. In Chile, the landscape is marred by mountains of discarded salt and canals filled with contaminated water with an unnatural blue hue. According to Guillermo Gonzalez, a lithium battery expert from the University of Chile, "This isn't a green solution - it's not a solution at all."

China is among the five top countries with the most lithium resources and it has been buying stakes in mining operations in Australia and South America where most of the world's lithium reserves are found. China's Tianqi Lithium owns 51 percent of the world's largest lithium reserve in Australia, giving it a controlling interest. In 2018, the company became the second-largest shareholder in Sociedad Química y Minera—the largest lithium producer in Chile. Another Chinese company, Ganfeng Lithium, has a long-term agreement to underwrite all lithium raw materials produced by Australia's Mount Marion mine—the world's second-biggest, high-grade lithium reserve.

Recycling Lithium-Ion

In Australia, only two percent of the country's 3,300 metric tons of lithium-ion waste is recycled. Unwanted MP3 players and laptops often end up in landfills, where metals from the electrodes and ionic fluids from the electrolyte can leak into the environment.

Because lithium cathodes degrade over time, they cannot be placed into new batteries. Researchers are using robotics technology developed for nuclear power plants to find ways to remove and dismantle lithium-ion cells from electric vehicles. There have been a number of fires at recycling plants where lithium-ion batteries have been stored improperly, or disguised as lead-acid batteries and put through a crusher. Not only have these batteries burned at recycling plants, but auto makers are seeing battery-related fires leading to vehicle recalls and safety probes. In October, U.S. safety regulators opened a probe into more than 77,000 electric Chevy Bolts after two owners complained of fires that appeared to have begun under the back seat where the battery is located.

Because manufacturers are secretive about what goes into their batteries, it makes it harder to recycle them properly. Currently, recovered cells are usually shredded, creating a mixture of metal that can then be separated using pyrometallurgical techniques—burning—which wastes a lot of the lithium. Alternative techniques, including biological recycling where bacteria are used to process the materials, and hydrometallurgical techniques which use solutions of chemicals in a similar way to how lithium is extracted from brine are being investigated.

It is estimated that between 2021 and 2030, about 12.85 million tons of EV lithium ion

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batteries will go offline worldwide, and over 10 million tons of lithium, cobalt, nickel and manganese will be mined for new batteries. China is being pushed to increase battery recycling since repurposed batteries could be used as backup power systems for China's 5G stations or reused in shared e-bikes, which would save 63 million tons of carbon emissions from new battery manufacturing.

Cobalt Extraction Also Poses Environmental Problems

Cobalt is found in huge quantities in the Democratic Republic of Congo and central Africa where it is extracted from the ground by hand, using child labor, without protective equipment. China owns eight of the 14 largest cobalt mines in the Democratic Republic of Congo and they account for about half of the country's output. While China has only 1 percent of the world's cobalt reserves, it dominates in the processing of raw cobalt. The Democratic Republic of Congo is the source of over two-thirds of global cobalt production, but China has over 80 percent control of the cobalt refining industry, where raw material is turned into commercial-grade cobalt metal.

Like lithium, the price of cobalt has quadrupled in the last two years.

Conclusion

Environmentalists expressed unfounded concerns about fracking, but they need to be worried about replacing fossil fuels in the transportation and electric generating sector with electric vehicles and renewable energy where lithium, cobalt and other critical metals are needed to produce these technologies. Mining, processing, and disposing of these metals can contaminate the drinking water, land and environment if done improperly as seen from several examples. And, since China dominates the global market, it just switches what once was U.S. reliance on the Middle East to U.S. reliance on the People's Republic."

Madeline Renneke · Citizen · (Postal Code: unknown) · Mar 15, 2021 2:15 pm

 0 Votes


Please see attached for comments collected by Minnesotans for Clean Cars.

JoAnn Sternberg · Citizen · (Postal Code: unknown) · Mar 15, 2021 2:20 pm

 0 Votes

I definitely OPPOSE the MN clean car rule! If you read the above you will see that electric batteries are made with lithium. Lithium extraction harms the soil and causes air contamination, among other things, and that is what we don't want. That is what this discussion is all about, right?!

Thad Kurowski · Citizen · (Postal Code: unknown) · Mar 15, 2021 2:25 pm

 0 Votes

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On behalf of Tesla, please see the attached submittal in support of Clean Cars MN with proposed rule amendments (also attached). Thank you.

Laurie Houg · Citizen · (Postal Code: unknown) · Mar 15, 2021 2:29 pm

👍 0 Votes

JoAnn Sternberg's comment on mining and processing tells me we need to not go any further with electric cars and as a newly retired American I don't have money to invest in a new electric car or update my current automobile and I am sure there are many seniors who will agree with me.

Terry Cook · Citizen · (Postal Code: unknown) · Mar 15, 2021 2:33 pm

👍 0 Votes

I want to first state that I don't oppose the OAH.... as a matter of fact as a retired Police Chief I suggested long ago that police officer disciplinary hearings go thru OAH instead of Arbitration... we need an unbiased 3rd party to make decisions instead of an arbitrator who won't have work if either of the two sides strike them. I listened to one of the OAH public hearings. Almost first to comment was a Car dealer from Maine. Then a man from Mpls who doesn't own a car and bikes everywhere. I believe it is important to listen to the people most likely to be immediately and directly affected by any law or rule. The car dealer said he can't get enough electric cars to sell, while at the same time stating MFR's have announced 20 new models for 2021-2022.... with a similar number coming to market in the next two years. Really? Doesn't seem to me that Gov't intervention is required.... if there is demand the market can most efficiently and will respond. This rule has such widespread implications I don't feel the OAH is the place for it, it belongs with the Legislature, and the MPCA is using the rulemaking process to bypass our elected bodies in forcing a decision that can have wide-ranging personal and economic effects on ALL Minnesotans.... not just the Twin Cities.. I don't oppose electric vehicles... metro areas are the site of most of our CO2 emissions, and the best place to implement these vehicles. Lost in this discussion is where all of this additional electricity is going to come from. We are moving away from coal (good) but we can't also simultaneously move away from nuclear and gas too. I am on the board of directors for an electrical Co-op and stay on top of this issue. Supply and reliability are important (see Texas and California). While it sounds good, due to their intermittency and NIMBY attitudes we can't build enough Solar farms or on-shore wind-farms (which TC residents want to benefit from but don't want to see or hear, see Connexus Energy's attempt to site a solar farm in Blaine) to meet our needs and also power our transportation sector. Rural MN is almost invisible in this discussion yet the TC wants their needs met by siting current clean energy technology mostly there. We need to develop new, more efficient generation technologies, and additional transmission systems to make this work going forward. I want and will tirelessly work for a carbon free future but trying to force it today without the actual ability to accomplish it is foolhardy. This issue belongs in the Legislature not one unelected rulemaking body, and the people of MN should decide this..... not people or money from other states. Thank you for the opportunity to comment.

Allison VanDerWal · Citizen · (Postal Code: unknown) · Mar 15, 2021 2:41 pm

👍 0 Votes

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Attached are comments from the Minnesota State Cattlemen's Association. We appreciate the opportunity to comment.

Anna Richey · Citizen · (Postal Code: unknown) · Mar 15, 2021 2:44 pm

👍 0 Votes

I am strongly in favor of the Clean Cars Rule. Not only is it essential that we begin to seriously address the role transportation plays in our greenhouse gas emissions, but lower/no emission vehicles are cheaper to maintain over time and will also reduce our dependency on oil. Living in Greater Minnesota, I had limited options when I was looking to purchase a hybrid or EV large enough for a family with three kids and a large dog. Local dealerships definitely didn't have much to offer and even places in the cities were limited. Time and again I kept finding my preferred vehicles out of state. It took more than six months and being on a list at multiple dealerships before I was finally able to get a hybrid vehicle that would work and I could afford. We can do better. Also, I think there are so many exciting options for reinvigorating tourism in smaller towns in Greater MN by expanding charging infrastructure. Unlike a "turn and burn" gas station stop, EV charging gives people time to get coffee at a local bakery, browse a shop, or get a bite to eat at a local restaurant. It brings an entirely new clientele to stagnant towns all across the state, potentially. Quite simply, the Rule will send an important market signal that can only benefit our state and our environment.

James Kelly · Citizen · (Postal Code: unknown) · Mar 15, 2021 2:46 pm

👍 0 Votes

Submitted on behalf of the Minnesota Department of Health.

GLENN NELSON · Citizen · (Postal Code: unknown) · Mar 15, 2021 2:51 pm

👍 0 Votes

I recently found additional information to further the discussion on electric cars.
THE PINEHURST PRESS NEWS & VIEWS (From Canada)

Interesting Take on Electric Cars

As an engineer I love the electric vehicle technology However, I have been troubled for a long time by the fact that the electrical energy to keep the batteries charged has to come from the grid and that means more power generation and a huge increase in the distribution infrastructure. Whether generated from coal, gas, oil, wind or sun, installed generation capacity is limited A friend sent me the following that says it very well. You should all take a look at this short article.

IF ELECTRIC CARS DO NOT USE GASOLINE, THEY WILL NOT PARTICIPATE IN PAYING A GASOLINE TAX ON EVERY GALLON THAT IS SOLD FOR AUTOMOBILES, WHICH WAS ENACTED SOME YEARS AGO TO HELP TO MAINTAIN OUR ROADS AND BRIDGES. THEY WILL USE THE ROADS, BUT WILL NOT PAY FOR THEIR MAINTENANCE!

In case you were thinking of buying hybrid or an electric car: Ever since the advent of

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electric cars, the REAL cost per mile of those things has never been discussed. All you ever heard was the mpg in terms of gasoline, with nary a mention of the cost of electricity to run it. This is the first article I've ever seen and tells the story pretty much as I expected it to.

Electricity has to be one of the least efficient ways to power things yet they're being shoved down our throats. Glad somebody finally put engineering and math to paper.

At a neighborhood BBQ I was talking to a neighbor, a BC Hydro Executive. I asked him how that renewable thing was doing. He laughed, then got serious.

If you really intend to adopt electric vehicles, he pointed out, you have to face certain realities. For example, a home charging system for a Tesla requires 75 amp service. The average house is equipped with 100 amp service. On our small street (approximately 25 homes), the electrical infrastructure would be unable to carry more than three houses with a single Tesla, each. For even half the homes to have electric vehicles, the system would be wildly over-loaded.

This is the elephant in the room with electric vehicles. Our residential infrastructure cannot bear the load. So as our genius elected officials promote this nonsense, not only are we being urged to buy these things and replace our reliable, cheap generating systems with expensive, new windmills and solar cells, but we will also have to renovate our entire delivery system! This latter "investment" will not be revealed until we're so far down this dead end road that it will be presented with an 'OOPS...!' and a shrug.

If you want to argue with a green person over cars that are eco-friendly, just read the following. Note: If you ARE a green person, read it anyway. It's enlightening.

Eric test drove the Chevy Volt at the invitation of General Motors and he writes, "For four days in a row, the fully charged battery lasted only 25 miles before the Volt switched to the reserve gasoline engine.

"Eric calculated the car got 30 mpg including the 25 miles it ran on the battery. So, the range including the 9-gallon gas tank and the 16 kwh battery is approximately 270 miles.

It will take you 4.5 hours to drive 270 miles at 60 mph. Then add 10 hours to charge the battery and you have a total trip time of 14.5 hours. In a typical road trip your average speed (including charging time) would be 20 mph.

According to General Motors, the Volt battery holds 16 kwh of electricity. It takes a full 10 hours to charge a drained battery.

The cost for the electricity to charge the Volt is never mentioned, so I looked up what I pay for electricity.

I pay approximately (it varies with amount used and the seasons) \$1.16 per kwh. $16 \text{ kwh} \times \$1.16 \text{ per kwh} = \18.56 to charge the battery.

$\$18.56 \text{ per charge divided by } 25 \text{ miles} = \$0.74 \text{ per mile to operate the Volt using the battery. Compare this to a similar size car with a gasoline engine that gets only } 32 \text{ mpg. } \$3.19 \text{ per gallon divided by } 32 \text{ Mpg} = \0.10 per mile.

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The gasoline powered car costs about \$25,000 while the Volt costs

\$46,000 plus. So the Canadian Government wants loyal Canadians not to do the math, but simply pay twice as much for a car, that costs more than seven times as much to run, and takes three times longer to drive across the country. wonder how much it costs to replace a battery and how long does the battery last or how often does it need to be replaced.

GLENN NELSON · Citizen · (Postal Code: unknown) · Mar 15, 2021 2:52 pm

👍 0 Votes

I am not the engineer that wrote this article above.

Bruce Kleven · Citizen · (Postal Code: unknown) · Mar 15, 2021 2:53 pm

👍 0 Votes

Please see attached.

CHRIS NEVERS · Citizen · (Postal Code: unknown) · Mar 15, 2021 2:58 pm

👍 0 Votes

Please see the attached comments regarding the Clean Cars proposal from Rivian Automotive.

Joseph Hauger · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:01 pm

👍 0 Votes

I appreciate the chance to comment on MPCA's proposed "Clean Car Rule." Overall I am opposed to adoption of the rule. My specific objection is to 7023.0300 which would mandate the percentage of zero-emission vehicles (ZEVs) available for sale in Minnesota. At best I feel this part of the rule would have little effect on anything, and at worst would raise prices for consumers of other types of automobiles, require dealers to hold un-sold vehicles in inventory, and increase demand for and cost of conventional electrical power generation. I also disagree philosophically with governments setting supply mandates for commercial products.

My main practical problem with the percentage mandate is that it makes no sense because the emissions taken off the roads would just be replaced by emissions from electrical power generation. Unless the electricity for the vehicles was made with nuclear power, or personal off-grid solar panels, there still would have to be emissions of some sort. (My understanding is that the expansion of renewable energy simply requires more demand for conventional backup power generation that results in emissions anyway.) In my mind this rule simply results in a tradeoff of emissions, with the likely consequence of added costs to consumers. I believe also it would also lead to an increase in the cost of electricity due to increased demand.

Secondly I don't believe that an electric vehicle would be cheaper to maintain for the

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owner as stated on the MPCA's Clean Cars web page. I see no numbers provided to back that up. I wonder how the price per mile of operation of an electric car compares to that of a conventional car. The most expensive way I've found to heat a space is with electric heat as compared with gas, propane, or wood, so I would assume using an electric car would also be more expensive per mile than a conventional modern gasoline vehicle. As a consumer, I would not choose to raise my electric bill voluntarily to save money at the gas pump.

Lastly, I disagree philosophically with governments mandating the availability of consumer products. This is not a role State government should have. Such mandates don't seem to do what they are intended and lead to inefficiencies in the market (for example, un-purchased inventory sitting on the shelves going to waste). Supply and demand should be left to the individual liberty of freedom of consumer choice. To me, the same philosophy applies with a car as with food, groceries, and beverage items. If a store doesn't carry a product I like, I tell them I would like them to carry it, and tell a bunch of my friends to tell them the same, until they carry the product and hopefully it sells well and stays on the shelves. If not, so be it.

I think a better approach for the State, if it desires to support the manufacture of ZEVs, would be to forget about passing a rule and instead lead by example and convert an ever increasing percentage of its own fleet of State vehicles to ZEVs. I would expect that the Governor's fleet of vehicles would be the first in the State to obtain these ZEV and ensure the Governor's vehicle and motorcade were ZEVs. I feel confident that if the State were to make these intentions known to manufacturers and dealers with whom the State does contractual purchasing and leasing, the manufacturers would be happy to supply those vehicles. Then, the State government could determine first hand if the vehicles were practical and saved cost and pass that data on to the Public, good, bad, or otherwise. An added bonus would be that used State vehicles could be auctioned off to private parties after the State replaced them, as happens with conventional vehicles now as I understand it.

Thanks again for the chance to comment.

Doug Seaton · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:02 pm

 0 Votes

Center of the American Experiment (CAE) opposes the adoption of the proposed "Clean Cars Minnesota" rules because they are illegal and bad for Minnesotans. CAE, through its attorneys at the Upper Midwest Law Center, attaches here CAE's full initial comments, along with an additional letter brief from the UMLC, which show that the proposed rules should be disapproved. CAE therefore urges the Administrative Law Judge to do exactly that.

Matt Belford · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:10 pm

 0 Votes

Please see attached letter.

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Sarah Anderson · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:11 pm

👍 0 Votes

Submitted on behalf of Minnesota Turkey Growers Association. Please see attachment.

Amber Backhaus · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:15 pm

👍 0 Votes

Attached please find comments (and two appendices) submitted by the Minnesota Automobile Dealers Association.

Jonathan Berry · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:23 pm

👍 0 Votes

Attached please see the comments of the Clean Fuels Development Coalition.

Anne Borgendale · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:26 pm

👍 0 Votes

Attached is an organizational comment from CURE (Clean Up the River Environment) in support of the adoption of the Minnesota Clean Cars rule. It is CURE's position that Minnesota Clean Cars is a very reasonable and needed measure to address some of the present energy, transportation, economic, climate, and air pollution issues currently facing rural places.

Amber Glaeser · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:26 pm

👍 0 Votes

Submitted on behalf of Minnesota Farm Bureau. Please see attached.

John Beath · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:27 pm

👍 0 Votes

Attached are comments by JBE, an environmental and sustainability consulting company. We appreciate the chance to provide comments.

Joshua Houdek · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:28 pm

👍 1 Votes

Dear Judge Palmer-Denig,

On behalf of 6,630 members of the public (see attachment), I would like to submit the following comments in support of the Clean Cars Minnesota program.

The Clean Cars Minnesota program will make it easier for Minnesotans and residents of neighboring states to purchase cleaner vehicles in Minnesota. This is a huge economic opportunity for Minnesota that we cannot pass up. The Clean Cars Minnesota program

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will reduce climate pollution, air pollution, and dependence on imported dirty oil. More vehicle choice will help Minnesota families save money and lower carbon footprints. And zero emission electric vehicles (EVs) are increasingly charged with Minnesota-made clean energy! The Clean Cars Minnesota program is a win-win.

The attached letter — as well as the accompanying personal notes from 1,674 signers — emphasizes that the Clean Cars Minnesota program is a critical and common-sense policy that would help reduce air pollution, tackle climate change, save Minnesota consumers money, and increase the number of clean, zero emission electric vehicles that are available for sale in Minnesota.

Many signers express a desire for greater access to cleaner vehicle options. If adopted, Clean Cars Minnesota would improve access to cleaner cars, light vehicle trucks and SUVs for these 6,630 signatories and all Minnesotans.

We thank you for the opportunity to submit this comment letter, and respectfully request that you take these public comments into consideration as you evaluate the proposed rule.

Sincerely,
Joshua Houdek
Senior Program Manager, Transportation
Sierra Club Minnesota North Star Chapter

Jim Landes · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:29 pm

 0 Votes

I DO NOT support adoption of the Clean Cars Minnesota proposal. This rule is little more than a shell game for virtue signalers. Here are a few points that illustrate this fact:

- China controls the majority of the world's lithium mining, including mines in Afghanistan.
- American soldiers protect China's mining interests and infrastructure in Afghanistan.
- The manufacture of a ZEV produces a carbon footprint magnitudes larger than a gas car.
- The majority of electricity in Minnesota is produced by coal-fired plants.
- The electric power transmission line loss to charging stations is not factored into the equation.
- Electricity production capacity would have to be increased to meet demand. A new coal-fired plant?
- "Free electricity" from charging stations is paid for by taxpayers who most likely don't own a ZEV.
- A "ZEV" is NOT zero emissions when auto manufacturing and power generation are factored in.

To everyone who supports this initiative and/or owns an electric car: Just remember that every time you put on the clean white gloves to charge your car: you are using electricity generated with gas/coal/nuclear (wind & solar negligible) brought to your charging station at a transmission loss, with

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lithium twice purchased from China with US Dollars AND the blood of American soldiers.

Kirsten Welge · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:33 pm

👍 0 Votes

Hi, this is Kirsten Welge, resident of Saint Paul, MN. I moved here from Los Angeles, CA in 2009, in my 2009 Toyota Camry Hybrid.

Los Angeles has come a long way since the smog of the 1970s, but the air quality & strong presence of polluting vehicles still caused constant respiratory stress and lowered immunity to disease during my residence from 2000-2009. I moved to Saint Paul seeking less traffic, less noise, and cleaner air, and found all three here.

In recent years, as the Metro grows, Minnesota has fallen behind its annual greenhouse gas emissions reduction goals. I want to make sure my adopted home state & city remain a good, clean, safe place to live for future generations, and that this community never comes close to what Angelenos currently experience.

Here in Minnesota, I have noticed that fewer electric vehicle models are available than in California. When I replace my car in another few years, I want the choice of LEVs & ZEVs I'd have if I were still living in California -- because I want to be a good neighbor in Saint Paul, and minimize my contribution to greenhouse gas emissions.

I have worked in both pediatric hospitals and adult outpatient health care since arriving in Minnesota, with one focus on asthma rates and disease burden for patients. 32% of the population of Minnesota are above risk guidelines for exposure to air pollution. Seen through the lens of health equity, this looks even worse: with 46% of low income community members and 91% of communities of people of color exposed to greater-than-recommended levels of air pollution. Air pollution also robs us of our neighbors, causing 2,000-4,000 premature deaths in Minnesota annually.

Our current situation poses a tremendous health burden for our population. Adopting Clean Cars would reduce air pollution -- plus reduce our contribution to greenhouse gas emissions -- reducing annual carbon emissions by 2 million tons by 2030.

And, it just makes good business sense. Adopting the Clean Car standards would save the average Minnesota family \$2,850 in gas over the life of the car. Additionally, electricity is a more price-stable, less expensive source of energy. Plus, LEV/ZEV maintenance and repair costs can be up to 60% lower than traditional vehicles. In sum, we can do better -- and reduce costs for ALL of us.

In summary:

- 1) I strongly support the MPCA adopting both the LEV & ZEV standards.
- 2) I strongly support implementing early-action only credit banking.

- 3) I am not in favor of the Early Action Plus One-Time Allotment. Auto makers will already have 3 years to adopt the change -- let's not encourage further delays in offering these vehicles for purchase in Minnesota.

Thank you for your consideration.

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Drew Lyon · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:34 pm

👍 0 Votes

This comment is submitted on behalf of the Minnesota Soybean Growers Association. Thank you.

Michael Maten · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:48 pm

👍 0 Votes

Please see attached comment submitted on behalf of General Motors.

Tim Schaefer · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:50 pm

👍 0 Votes

Attached are comments on behalf of myself and Environment Minnesota. Additionally, I urge the Office of Administrative Hearings to adopt a much more accessible format for commenting, such as a dedicated email for each comment period. Requiring each commenter to register for an account and to navigate this fairly confusing website is simply not adequate.

Simon Horowitz · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:53 pm

👍 0 Votes

Dear Judge Palmer-Denig,

I'm with Environment Minnesota, we're a statewide environmental advocacy group. I'm writing on behalf of Environment Minnesota members who want clean air and a healthy climate. Attached below is 108 grassroots comments in strong support of the proposed clean cars rule. We ask that these names be entered into the official record and considered as separate public comments.

Thank you for the opportunity to comment.

Sincerely,

Simon Horowitz,
Global Warming Associate,
Environment Minnesota

John Wiese · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:54 pm

👍 0 Votes


The vehicle cost increase to meet the new standards is significantly under estimated by the MPCA. Yes, the base costs came from the EPA, which is based on 5 year old data. The EPA documents states that the improvements can be met with "such as improvements in engines, transmissions, light-weighting, aerodynamics. In the past 5 years auto manufactures have already implemented most of these strategies (turbochargers,

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variable valve timing , 9 speed transmissions, CVT's, engine off at stops, switch from 6cyl to 4 cyl engines) to improve fuel economy. Additional improvements will cost significantly more because early all of the lowest cost changes have already been adopted. Future vehicle changes to improve fuel economy with be exponentially more expensive. the EPA has a history of underrating the cots of emissions improvements. I have professionally been involved with the design and manufacture of vehicle emission control products for over 25 years. In my experience EPA under estimates the cost by at least 200 - 300%...sometimes as much as 400%. The cost analysis needs to be updated with real world 2021 cost, not use a projected cost that 5 years ago. Technology changes too much in 5 years.

Todd Johnston · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:56 pm

 0 Votes

On behalf of ConservAmerica, please see the attached comments to OAH docket number 71-9003-36416 (Clean Cars Minnesota).

Sara Wolff · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:57 pm

 1 Votes

Judge Palmer-Denig,

Please see the attached letter, signed by 12 organizations and the Minnesota Environmental Partnership, supporting the proposed rulemaking to accelerate the availability and adoption of clean cars.

We appreciate the opportunity to comment.

Sincerely,
Sara Wolff
Advocacy Director
Minnesota Environmental Partnership

John Wiese · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:58 pm

 0 Votes

The Biden administration has just started to review vehicle emission standards with the EPA. it is highly likely the]US EPA standards will change before this proposal implemented. The proposed legislation need to be put on hold until the new changes are known. It makes no sense to implement this if the US EPA rules are going to change.

John Wiese · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:58 pm

 0 Votes

The Biden administration has just started to review vehicle emission standards with the EPA. it is highly likely the]US EPA standards will change before this proposal implemented. The proposed legislation need to be put on hold until the new changes are known. It makes no sense to implement this if the US EPA rules are going to change.

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Anne Borgendale · Citizen · (Postal Code: unknown) · Mar 15, 2021 3:59 pm

👍 0 Votes

The attached files are the 200 individual comments on Minnesota Clean Cars from CURE supporters and members. CURE (Clean Up the River Environment) is a 30-year-old rural grassroots organization based in Montevideo, MN. CURE's work focuses on Climate, Energy, Water, and Rural Democracy.

Ryan Houlihan · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:01 pm

👍 0 Votes

Please see the attached comment submitted on behalf of Representative Dean Phillips.

Jukka Kukkonen · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:04 pm

👍 1 Votes

I think that the Clean Cars MN rule is needed and reasonable.

I have driven over 8 years with electric cars. I'm an automotive industry professional and teach EV Market and Technologies at the University of St Thomas.

In this written testimony I will focus on the ZEV part of the rule making.

For years both Europe and US markets had very similar EV sales numbers and the EV sales growth was relatively slow (<https://www.iea.org/reports/global-ev-outlook-2020> .) During recent years public surveys have been showing consistently that about 30% of people would consider an EV. (e.g. <https://www.consumerreports.org/hybrids-evs/cr-survey-shows-strong-interest-in-evs/> .) At the same time, EV market share was just a couple of percentage points both in Europe and in the US. Why the sales were so low even though third of the public says they would consider buying an EV? We learned the answer last year.

Over the years customers in the US and Europe have had very few models to choose from and auto manufacturers have also provided EVs for sale in very limited numbers. Most manufacturers have not advertised EVs or made any real effort to promote their existence, and limited vehicle availability has prevented local dealers from advertising them as well. Even though people said that they would consider buying an EV, when they started choosing their next car they didn't think that EVs would be an option since manufacturers were not promoting them.

In 2020 the European Union tightened their vehicle emissions so that the EU fleet-wide average emission target for new cars was 95 g CO2/km. This was a sizable drop since the average emissions of new cars registered in 2019 in the EU28, Iceland and Norway were 122.4 g CO2/km. (https://ec.europa.eu/clima/policies/transport/vehicles/cars_en) The only way that auto manufacturers could meet the new standards was to actively bring EVs to the market. This changed things rapidly in Europe, and EV market share in Europe tripled from 3.3% to 10.2%. Manufacturers and dealers learned that the customer demand was there so they sold 1.4 million EVs and now the auto industry forecasts that EV market share in Europe will be 40% in 2025.

At the same time, US EV sales in 2020 were just slightly up with 328 000 units sold

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compared to 316 000 year before. (<https://cleantechnica.com/2021/02/08/2020-us-electric-vehicle-sales-report/> .) A big reason for this was that auto manufacturers put a lot of effort into the European market, so EV availability was even worse in 2020 in the US compared to previous years. This goes to show that even though we know EVs are the future of transportation, the rate of adoption depends strongly on the actions taken by the markets. The US is already finding itself at a competitive disadvantage, and the slower we move, the further we drop. This same dynamic is applicable to Minnesota's standing among other US states.

Another perspective on vehicle availability and customer demand is to look at how the only auto manufacturer that sells just EVs, Tesla, did last year. In the US, light duty vehicle sales were down on average by 14.4%. The only major auto manufacturer who saw double digit growth in the US was Tesla, with sales up over 20%. So, Tesla was able to grow even in a year of pandemic. This shows that customer interest is there if manufacturers provide EVs to the market.

These numbers clearly show that vehicle availability is the biggest reason why EV market share has not increased, even though a considerable portion of the public would consider buying one.

Clean Cars MN will also help Minnesota auto dealers to stay competitive in the future. Tesla has been quickly gaining market share in Minnesota. In 2020, their market share was already over 1% and they have passed a lot of well-known brands like Audi, Chrysler, Lexus, Lincoln, Mercedes, Mitsubishi and Volvo. Even more concerning is that Tesla sold over 70% of new EVs in Minnesota last year. In the coming years Rivian, Lucid and other new EV manufacturers will provide their vehicles to the Minnesota market and this will further erode traditional auto dealers' market share. Auto dealers will need auto manufacturers to start providing them more EVs for Minnesota along with training, support and EV advertising budgets. Clean Cars MN will help with this and will therefore help Minnesota auto dealers to compete in this growing segment.

Clean Cars MN is a small step to the right direction and provides auto makers plenty of time to comply. It doesn't require them to do anything until 2024 and still is giving them one year worth of free credits, which is totally unnecessary because it just allows them to further postpone their action. Auto manufacturers could reach these sales already this year if they wanted to. Last year we had some auto dealers in Minnesota with EVs over 10% of their sales and Tesla sells 100% EVs and keeps increasing its market share in Minnesota.

Latest announcements from Ford, GM, Jaguar and Volvo have made it clear that EVs will replace internal combustion engines weather oil companies like it or not. But local industries should also rest assure that no matter how much we work on this it will be a slow transition. We have over 5 million internal combustion engine vehicles in Minnesota right now. This rule will only require automakers to make sure that about 6% of their sales is zero emission vehicles in 2024 and 8% in 2025. If we would continue with similar annual 2 percentage point increase trajectory from there it would take over 60 years to replace our fleet of oil burners with electric vehicles which we can be powered with renewable energy. So industries have plenty of time to adjust.

We are expecting 17 new EV crossover, SUV and pickup truck models to hit US market this year, but we have no idea which of those will be available in Minnesota. All in all, we should have over 100 EV models, of which over 70 will be crossovers, SUVs and pickup trucks, available in the US market in 2023. Again, we have no idea how many of those

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will be available in Minnesota and that is why we need Clean Cars MN. This rule sends a clear signal to auto manufacturers that Minnesota wants access to all of these latest models.

Alyssa Tsuchiya, Union of Concerned Scientists · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:05 pm
👍 0 Votes

Dear Judge Palmer-Denig,

Thank you for the opportunity to comment on the Clean Cars Minnesota rulemaking. The Union of Concerned Scientists (UCS) is the nation's leading science-based nonprofit putting rigorous, independent science to work to solve our planet's most pressing problems. On behalf of UCS's 6,800+ supporters in Minnesota, we strongly recommend adoption of the Low Emission Vehicle (LEV) standard and Zero Emission Vehicle standard (ZEV).

Please find our technical comment attached.

Sincerely,

Alyssa Tsuchiya

Clean Transportation Program

Union of Concerned Scientists

Joshua Houdek · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:05 pm
👍 1 Votes

Sierra Club Minnesota North Star Chapter Comments delivered at February 22, 2021 Hearing:

Good afternoon, Judge Palmer-Denig.

My name is Joshua Houdek. I am the Senior Manager with the Sierra Club Minnesota North Star Chapter. Sierra Club is the nation's oldest and largest grassroots environmental organization.

I am speaking today on behalf of Sierra Club and its 80,000 members and supporters in Minnesota and more than 3.8 million nationwide. I am also speaking as a father and a proud Minnesotan concerned about the threat that tailpipe pollution poses to our State's climate, health, and economy.

The Sierra Club strongly supports the Clean Cars Minnesota program.

I want to make two points in support of Clean Cars Minnesota, and flag one concern with the proposed rule.

First, Minnesota is falling behind on its climate goals. To meet our goals we must electrify

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the transportation sector--our state's leading source of climate pollution. Shifting to EVs means consumers need access to them. In 2019, Sierra Club conducted a nationwide study of the EV shopping experience. Unsurprisingly, we found significant differences in EV inventory between states with a Clean Cars program and those without one, despite the increasing number of EV models. This customer experience results from manufacturers focusing their delivery of EVs on specific states or regions. Clean Cars Minnesota will help overcome that problem.

Second, tailpipe pollution dramatically harms our public health. Our own Minnesota Department of Health estimates that tailpipe emissions contribute to 2,000-4,000 deaths per year in the Twin Cities alone. Tragically, this pollution disproportionately affects communities of color and lower income communities. The State's 2019 Life and Breath report showed that rates of premature death and ER visits are dramatically higher in these communities. Clean Cars Minnesota will help support environmental justice objectives by reducing dangerous pollution.

Finally, I want to share a concern with the proposed rule: the "one-time credit allotment" found in subpart 5 of the Zero Emission Vehicle Standards. This provision is essentially a giveaway of the credits required for compliance with the program in the first year. Sierra Club strongly opposes this credit giveaway because it is not necessary for program feasibility and will needlessly weaken the rule. This provision should not be a part of the final rule.

We urge you to continue to move toward adoption of Clean Cars Minnesota. Thank you.

Conor Sexton · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:07 pm

 0 Votes

I want Minnesota to be a leader when it comes to offering its residents transportation options and meeting emissions goals, so I support this ruling. Already, 14 states have adopted these standards—it's not just California. In fact, states with northern climates including Maine and Vermont have adopted these standards.

Already, auto makers are providing more options for EVs but those options are not necessarily available to Minnesotans, even if there's demand. This ruling doesn't stop anyone from purchasing gas vehicles, vehicles with 4WD, nor does it force anyone to buy an electric vehicle if it doesn't suit their needs.

But for those of us that do want to buy LEVs and ZEVs to save money on gas and reduce pollution, we deserve the market choices those in other states enjoy.

John Wiese · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:08 pm

 0 Votes

The MPCA cost analysis assumes vehicle manufactures will meet the proposed standards without any non-compliance penalties. it is highly unlikely the manufactures will be able to meet the standards without penalties on many vehicles, especially light trucks. Yes, there are credits and other means to avoid the penalty, but they will be quickly used up. Additional cost analysis needs to be done with varying penalty costs added to the vehicle cost increase value (which is already too low).

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Madeline Renneke · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:09 pm

👍 0 Votes

Please see attached for additional comments collected by Minnesotans for Clean Cars.

Wanda Patsche · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:09 pm

👍 0 Votes

The undersigned community stakeholders would like to express our concerns regarding the Minnesota Pollution Control Agency's proposed Clean Cars Minnesota rulemaking (OAH docket number 71-9003-36416). This proposed rule would unfairly mandate vehicle manufacturers to distribute electric vehicles (EV) into the Minnesota market and eventually adopt the Low-Emission Vehicles (LEV) and Zero-Emission Vehicles (ZEV) standards established by the California Air Resources Board. This counterproductive rule would harm Minnesota's farmers, automakers and dealers, consumers, energy suppliers, among other constituencies. At minimum, we strongly urge you to delay the adoption of the Clean Car Minnesota Rule so there can be more careful consideration among Minnesota residents and lawmakers.

See uploaded PDF for our open letter detailing these positions.

The letter includes the following signatories:

Brad Gruhot, President, Marshall Area Chamber of Commerce
Brad Meier, President/CEO, Owatonna Area Chamber of Commerce & Tourism
Bud Stone, President, Grand Rapids Area Chamber of Commerce
Christie Ransom, President & CEO, Winona Area Chamber of Commerce
Deb Whalen, Past President, Minnesota Agri-Women
Elaine Hansen, President, Austin Area Chamber of Commerce
Gus Ortis, Owner-Operator of Executive Transportation, 2021 President of Minnesota Chauffeured Transportation Association
Isaac Orr, Policy Fellow, Center of the American Experiment
James Jirava, County Delegate, Minnesota Soybean and Corn Growers for Becker/Mahnomen Counties
Jennifer Harmening, President, Burnsville Chamber of Commerce
John Hausladen, President & CEO, Minnesota Trucking Association
Karolyn Zurn, Past President, Minnesota Agri-Women
Ken Warner, President and CEO, Willmar Lakes Area Chamber
Lance Klatt, Executive Director, Minnesota Service Station & Convenience Store Association
Lawrence Sukalski, corn and soybean farmer in Martin County, MN
Maureen Scallen Failor, President, Dakota County Regional Chamber of Commerce
Rick Thielen, President of the Minnesota Charter Bus Operators Association
Ronny Reitmeier, Human Resources Manager / Crookston Chamber of Commerce Board Member
Shannon Full, President, Fargo Moorhead West Fargo Chamber
Shari Wilson, IOM, Executive Director, White Bear Area Chamber of Commerce
Tim Gross, Executive Director, Minnesota Petroleum Marketers Association
Tony Kwilas, Director of Environmental Policy and John Reynolds Director of Energy Policy, Minnesota Chamber of Commerce

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Wanda Patsche, corn, soybean and hog farmer, and the Editor of MNFarmLiving.com

Madi Johnson · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:09 pm

👍 1 Votes

Attached are the final comments and petition signers from MN350 supporters.

Kathryn Lozada, ISIAIH · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:11 pm

👍 0 Votes

Please see attached comments in support of Clean Cars Minnesota rulemaking from ISIAIH faith leaders and members. ISIAIH organizes people of faith and shared values towards racial, economic, and climate justice in Minnesota.

Sincerely,
Kathryn Lozada
Southern MN Organizer, ISIAIH

Jo Olson · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:11 pm

👍 1 Votes

The attached comments are submitted by Fresh Energy on behalf of 743 Minnesotans Regarding Clean Cars Minnesota Rulemaking

Elizabeth Van Holt · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:14 pm

👍 0 Votes

On behalf of American Petroleum Institute and American Fuel and Petrochemical Manufacturers, please see attached joint comments to Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards—Clean Cars Minnesota, Minnesota Rules, chapter 7023; Revisor's ID Number 04626, OAH docket number 71-9003-36416.

Anjali Bains · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:19 pm

👍 1 Votes

Hello, on behalf of Fresh Energy, Minnesota Center for Environmental Advocacy, Natural Resources Defense Council, and Sierra Club, I submit our initial comments on the proposed rulemaking to adopt Clean Cars Minnesota. Thank you.

Amanda Bilek · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:20 pm

👍 0 Votes

Attached please find comments from the Minnesota Corn Growers Association.

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John Wiese · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:21 pm

👍 0 Votes

The proposed rule will adversely affect non-metro residents of the state. Especially those in border towns in the Northwest (Moorhead), Southwest (near Sioux Falls) and Southeast (near Lacrosse). The residents of these areas have very limited MN auto dealers there area. Most of these residents purchase their cars in another state in which dealers will not have vehicles that can be sold in Minnesota. As a result these residents will have travel long distance just to purchase a car and have it serviced. If these residents can't purchase a new vehicle in an adjoining state isn't this restricting inter state commerce, which is illegal!! The small auto dealers in greater Minnesota will suffer significant costs in inventorying EV's as very few people there will purchase them. the added cost will just be passed on to those buying non-EV's which is not fair.

Nels Paulsen · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:22 pm

👍 0 Votes

On behalf of Conservation Minnesota members in all 87 Minnesota counties, I write in support of the entire Clean Cars Rulemaking proposal. A more detailed explanation of our support can be found in the letter attached.

Sincerely,
Nels Paulsen
Policy Director
Conservation Minnesota

Consumer Reports · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:23 pm

👍 0 Votes

The attached files represent comments from Consumer Reports. CR, and the members it represents, write in support of adopting the LEV and ZEV programs.

Key Statistics from Consumer Reports findings:

- 55% of adult Minnesota drivers 'agree' or 'strongly agree' that the state should require automakers to offer plug-in electric vehicle options; 20% 'disagree' or 'strongly disagree.'

- 64% of adult Minnesota drivers 'agree' or 'strongly agree' that incentives and tax rebates for EVs should be targeted towards low and moderate income consumers.

- 70% of adult Minnesota drivers 'agree' or 'strongly agree' that electric utility providers should offer discounts to charge EVs at times when electricity demand is low.

- 63% of adult Minnesota drivers 'agree' or 'strongly agree' that automakers should make a variety of vehicle types available as plug-in EVs, including pickup trucks and SUVs; only 7% disagree or strongly disagree.

- Owning an electric vehicle will save the typical driver \$6,000 to \$10,000 over the life of the vehicle, compared to owning a comparable gas-powered vehicle

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- The average EV driver will spend 60% less to power their vehicle than the owner of a gas-powered vehicle.

- EV owners are spending half as much to repair and maintain their vehicle as owners of gas-powered vehicles; with much of that savings benefiting used car buyers.

Diane Schaffer · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:23 pm

 0 Votes

Dear Administrative Law Judge Jessica Palmer-Denig,

I oppose the Minnesota Pollution Control Agency's proposed regulations on vehicle emission standards. I am not opposed to electric vehicles, but I am opposed to laws and regulations that could force these cars on Minnesotans.

Mn has a majority of trucks and suvs on our roads.

Those who want to drive battery operated vehicles can fund their own charging stations.

Cell towers were installed by companies not tax payers.

Also, all the mining for the chemicals needed to make batteries and disposing of them are detrimental to our land.

Stop CA laws coming into MN!

Joanne Schmidt · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:26 pm

 0 Votes

I oppose the MPCA proposal to adopt the California Air Resources Board LEV and ZEV standards through the Clean Cars Minnesota initiative. I also do not agree with our current Governor and his administration taking back door methods to get unpopular agendas into law. This topic should be decided in the legislature - not by beauracrats that we have not elected.

Anne Borgendale · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:28 pm

 0 Votes

Another group of individual comments submitted to CURE.

Jordan McGillis · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:28 pm

 0 Votes

Institute for Energy Research
Comment on Clean Cars Minnesota
March 15, 2021

The foremost justifications offered by the Minnesota Pollution Control Agency (MPCA) in its Statement of Need and Reasonableness (SONAR) for the adoption of the California rules on low emission and zero emission vehicles are that adoption (1) would reduce greenhouse gas emissions that contribute to climate change and (2) would increase vehicle choice for Minnesota consumers. In the section of the SONAR subtitled "General

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reasonableness of the proposed rule amendments as a whole,” MPCA alludes specifically to the state’s collaborative project known as the Pathways report, which identified as key themes a climate crisis and Minnesotans’ desire for more transportation options.

MPCA fails to convince the Institute for Energy Research that it is either capable of or prepared to address these two key themes via the adoption of the California rules.

On emissions reduction and climate change damages, MPCA inadequately presents the costs and benefits of the proposal. On transportation options, MPCA suggests it is more capable than Minnesotans are of making vehicle purchase decisions.

Emissions Reductions and Climate Change Damages

MPCA estimates that under the proposed rule by 2034 annual well-to-wheel emissions reductions will be 1.4 million tons of greenhouse gases. Even if accurate, this figure does not eclipse any threshold of significance when Minnesota’s transportation emissions are put into the context of the global economy.

In the most recent year on record, 2018, global emissions were around 40 billion tons. That total is likely to climb yet higher through 2034, meaning that Minnesota’s transportation reductions would bring global totals down by less than one-one hundredth of one percent. The emissions reductions, even in the best-case scenario, will be so trivial on the global scale as to render measurement of the policy’s success impossible, in terms of the key theme of a climate crisis.

Despite this, MPCA estimates the total reduction of emissions resulting from the proposed rule over the first ten years of implementation would equate with an economic benefit of approximately \$500 million. This figure requires far more context than MPCA offers in the SONAR.

According to the SONAR, the \$500 million in economic benefits is based on MPCA’s use of “the federal social cost of carbon (fsc) produced by the Interagency Working Group (IWG),” which for the purposes of its analysis was set at \$51. MPCA fails to inform Minnesotans that the social cost of carbon is a metric rife with contention.

The IWG figure used by MPCA is the estimate generated by President Obama’s environmental regulators during his second term in office and recently adopted on an interim basis by the current administration. The Obama-cum-Biden figure has faced sharp criticism for its selective following of clear rulemaking guidance on the use of a key parameter known as the discount rate.

The Executive Branch Office of Management and Budget (OMB) writes instructions for federal agencies in regulatory analysis. These instructions are delivered in the form of OMB “circulars.” OMB Circular A-4 establishes clear guidelines for making rules with intergenerational effects, such as the social cost of carbon, directing agencies to employ constant discount rates of both 3 percent and 7 percent.

(https://obamawhitehouse.archives.gov/omb/circulars_a004_a-4/)

As described by the Obama administration in its Technical Support Document for the social cost of carbon, “According to OMB’s Circular A-4, it is appropriate to use the rate of return on capital when a regulation is expected to displace or alter the use of capital in the private sector. In this case, OMB recommends Agencies use a discount rate of 7 percent. When regulation is expected to primarily affect private consumption—for instance, via higher prices for goods and services—a lower discount rate of 3 percent is appropriate to reflect how private individuals trade-off current and future consumption.” (<https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/for-agencies/Social-Cost-of-Carbon-for-RIA.pdf>)

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Despite this instruction, the Obama administration opted to omit the 7-percent estimate. The result of this omission was profound, controversial, and now reverberates in this Minnesota proposed rule. MPCA claims the federal social cost of carbon "is the most credible estimate of the global damages from the emissions of one ton of carbon in any given year" yet fails to communicate to Minnesotans that estimates vary wildly. Suggesting that an estimate of \$500 million as indubitable is to ignore the very process that MPCA deems "most credible."

Amid the controversy sparked by the Obama administration omission of the OMB-directed 7 percent discount rate, Dr. David Kreutzer and Dr. Kevin Dayaratna of the Heritage Foundation produced a research paper addressing the elements of confusion. (<https://www.heritage.org/environment/report/loaded-dice-epa-model-not-ready-the-big-game>)

Utilizing the DICE model of Nobel-winning economist Dr. William Nordhaus, Kreutzer and Dayaratna found that the 7-percent discount rate reduces the estimate of the social cost of carbon by more than 80 percent. Under identical climate change parameters, while a 3-percent discount rate yields the MPCA cited figure of \$51, a 7-percent discount rate yields less than \$10.

MPCA's context-dropping deployment of its \$500 million in damages figure does an injustice to the field of climate economics. A range of estimates can be reached by following federal government guidelines. Minnesotans deserve to see that range, rather than just the figure MPCA finds most convenient.

Lest readers of this comment fall under the misapprehension that this is a controversy solely in the minds of politically conservative Beltway operatives, consider the way the social cost of carbon discussion has been characterized by Dr. Noah Kaufman, appointed recently to President Biden's Council of Economic Advisors. On August 17, 2020, Kaufman was the top-billed author of a paper appearing in the journal *Nature*, in which the social cost of carbon was essentially tossed to the analytical rubbish bin. Kaufman wrote that the social cost of carbon "cannot be credibly estimated with sufficient precision to provide practical assistance to policymakers" and that "large uncertainties come from parameters that are inherently uncertain, such as the appropriate discount rates, risk aversion levels, issues around inequality and attempts to assign monetary values to non-economic climate damages." (<https://www.nature.com/articles/s41558-020-0880-3>)

Kaufman will now be among the leading drivers of the Biden administration's refiguring of carbon regulation, rendering MPCA's claims about the credibility of the federal social cost of carbon effectively null and void.

On Consumer Choice

The second claim lacks even the first claim's modicum of validity. Meaningful consumer choice emerges from the complex web of economic decisions that only free actors can make. Forcing a product onto a market, on the other hand, is rank paternalism. The Institute for Energy Research recognizes that some vehicle purchasers will find electric vehicles (EVs) appealing, but it stresses that government intrusion into the vehicle marketplace yields economic distortions that tend to benefit the wealthier segment of consumers for whom electric vehicles are a prudent choice. MPCA believes it has special knowledge that Minnesotans are unable to see for themselves. But there are good reasons why many will not leap towards EVs and why manufacturers and auto dealers will thus be reluctant to feature them as prevalently as other vehicles.

Electric vehicles perform poorly in the cold weather that Minnesotans experience each

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winter, electric vehicles have shorter range than most internal combustion engine vehicles, and electric vehicles cost more than comparable alternatives. For example, the MSRP of the 2021 Hyundai Kona Ultimate is close to \$47,000, while the gasoline version has an MSRP of \$15,000 less.

Lastly, California is a peculiar state for Minnesota to attempt to replicate. The geographies of the respective states could not be more different. One is coastal and mountainous, while the other is continental and has a maximum elevation of 2,300 feet. One has its population centers in mild climates; the other's population center is among the coldest major metropolises in North America each winter. Further, California, once an emblem of the American Dream, has become largely unaffordable for the middle class and has begun to suffer from out-migration of residents squeezed by policies such as it has implemented in transportation.

In conclusion, the Institute for Energy Research finds MPCA's SONAR unconvincing in its presentation of two main justifications for the adoption of California vehicle rules.

Sincerely,

Jordan McGillis
Deputy Director of Policy
Institute for Energy Research

Dwight Wagenius · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:28 pm

👍 0 Votes

The Intergovernmental Panel on Climate Change tells us that the world must reduce greenhouse gas emissions by 45% by 2030 in order to avoid the most catastrophic impacts of climate change. Minnesota needs to do its fair share.

Right now, according to the Minnesota Pollution Control agency, Minnesota is not close to meeting our now outdated greenhouse reduction goals. Science tells us our goals must stronger. MPCA also tells us that the transportation sector is the largest emitter of greenhouse gases in Minnesota.

Denigrating science is no longer an option if we are to leave our children and grandchildren the same promising future that we inherited.

"Clean Car" rules will help Minnesota do its fair share to reduce greenhouse gas emissions.

John Wiese · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:29 pm

👍 0 Votes

The proposed rule states that its implementation will not affect our buying choices. The proposed rule will significantly changes vehicles as we know them. Most of cost effective fuel economy changes have already been implemented. The only way to meet the proposed changes will be through significant engine power reductions will significantly change their performance. As a result people will buy more heavy duty light trucks that are not affected by these rules.

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Margaret Miller · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:29 pm

👍 0 Votes

I am concerned that the proposed Clean Cars Rulemaking proposal will increase the cost of ownership for minority and low income families. That it will impose burdensome regulations on the auto industry and force them to stock vehicles on their lots for which there is not consumer demand. I do not believe it is in the best interest of Minnesotans to base our rulemaking on another state's rules. We should come up with our own policies that take into account the unique needs of our state and its climate. What may be right for California does not make it right for Minnesota.

Brad Kodet · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:31 pm

👍 0 Votes

NO California style vehicle emissions policies/mandates in MN.

Something like this needs to go thru the legislature - it should NOT be done via administrative rule and unelected bureaucrats.

No other midwestern state burdens its vehicle dealers with such mandates. This would diminish buyer choice, and significantly increase the price of each new vehicle by approx. \$1000.00.

Why push a "mandate" anyway? In the end real-life car shoppers (not mandates, not the say-so of proponents) will determine how much call there is for vehicles of this type.

Unwarranted CA style vehicle emissions policies/mandates should NOT be imposed in MN.

Aaron Miller · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:32 pm

👍 0 Votes

I strongly encourage not adopting the CA emissions laws. This is very simple - a vast majority of comments in here supporting the adoption of these laws is complaining about needing more options to purchase ZEV, LEV, EV, etc vehicles. There is nothing stopping you from purchasing these vehicles from any state you wish, including California, and bringing it to MN.

Whereas, you will be prohibited from purchasing a vehicle from another state that does not meet the stringent requirements set forth by another State's governing body, and registering it here.

The cost implications will have a ripple effect across major economic resources for the State negatively impacting people of all income levels, many of which that affording newer transportation that would meet these laws just isn't possible. This, in a time where economic stimulation is needed more than ever.

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Glen Mathiason · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:33 pm

 0 Votes

My name is Glen Mathiason. I am a former 20 yr. County Commissioner. This is the Midwest we grow corn, we make Ethanol, we produce it right here in this state. Adding to the economy rather than something that would detract from it. Use any blend of Ethanol from E15 to E85 to help solve Emission problems. PLEASE don't follow a state that we have nothing in common with and have no common sense

Amber Backhaus · Citizen · (Postal Code: unknown) · Mar 15, 2021 4:50 pm

 0 Votes

Attached find signatures from over 14,000 Minnesotans opposed to the rule.