

Jan 10, 2021

DAH. Docket Number 71-9003-36416

Dear Administrative Law Judge Palmer-Denig
I hereby send my full support for The
Rule adoption.

RCVD DAH '21 JAN 13

Proposed Rule 7023.0150

The adoption of This rule would help The citizens
of Minnesota reduce our carbon emissions.
We are already experiencing climate change
noticeably in The winter. This climate change
affects us all. Increased intensity of storms
is costly. Pollution harms health. Minnesota
is behind in its climate goals. We need
to do more.

By adopting This rule we will be doing
our part in saving. We can make a difference
and be stronger than what our federal
government sets as standards for car emissions.

Please adopt and apply These California Standards
for car emissions as soon as possible.

Sincerely,

Carolyn Law
505 2nd Ave SE #215
Little Falls MN 55435

RCVD OAH *21 JAN 22

My name: Ellen Schousboe

page 1.

Comment: Clean Cars MN, OAH docket # 71-9003-36416

I very strongly endorse and support the proposed ZEV Standard and LEV Standard. We need less traffic pollution and more EVs available, especially the most affordable models. Dealers aren't meeting the demand in MN.

Air pollution has been proven to cause cancer, heart disease, diabetes, asthma, and Chronic Obstructive Pulmonary Disease. Air pollution is also linked to Alzheimers, other dementias, Multiple Sclerosis, Parkinson's Disease, and Motor Neuron Disease. Air pollution is a big reason that people of color in inner cities die from COVID more than five times as often as white people. These diseases drive up health care costs for everyone, and they kill people. (1,2,3,4)

We're also in a climate emergency. Climate change is not being debated among scientists - it is proven, and it's happening now. Over 95% of climate scientists agree. Climate disasters have already cost our economy billions of dollars per year, (5,6,7) and get more expensive every year. We're almost out of time to reduce greenhouse gas pollution.

Electric cars have been shown to pollute less than gas cars, even when the electricity is from coal. (6,7) Mining the minerals for batteries isn't as clean as we want it to be, yet. But current batteries cause less pollution than drilling for oil and fracking. And the only way

to invent cleaner batteries is to buy EVs now, so investors can afford to support research and development. If too few EVs sell, investors won't finance battery improvement. Most EV drivers charge at home, but companies also won't build charging stations until more people buy EVs. They need economies of scale.

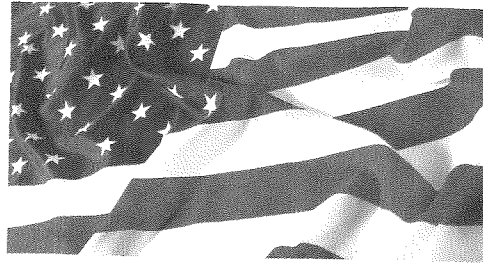
References Cited

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Scientific American E&E News, 1/11/2021.
[www.scientificamerican.com/article/
billion-dollar-disasters-shattered-u-s-record-
in-2020/](http://www.scientificamerican.com/article/billion-dollar-disasters-shattered-u-s-record-in-2020/)



Dear Judge,

We live in a cold state.
Batteries do NOT do well
in cold and below 0 weather.
We do NOT want battery
vehicles. Do you see many
Tesla's in Minnesota?
We don't want to follow
California!!!

Respectfully
Doreen Dahl
Larson

NO ONE DOES MORE FOR VETERANS.

St. Anthony Park Community Council/District 12
P.O. Box 8124
Saint Paul, MN 55108

ST. ANTHONY PARK



To: The Honorable Jessica Palmer-Denig
% OAH Legal Assistant Anne Laska
Office of Administrative Hearings
600 North Robert Street
P.O. Box 64620
St. Paul, Minnesota 55164-0620

February 11, 2021

ORH FEB18 '21 AM 9:57

RE: OAH docket # 71-9003-36416

Dear Honorable Judge Palmer-Denig:

The St. Anthony Park Community Council (SAPCC) supports the proposed MPCA rule change (the Clean Cars Minnesota rule) that will make electric vehicles (EVs) much easier to find for purchase in Minnesota. We believe this proposed rule would have almost no adverse aspects, while essentially all impacts would be positive. Our support stems from the mission of SAPCC to enhance our neighborhood's quality of life, the vitality of our community, and the effectiveness of our government.*

In particular within the proposed Clean Cars Minnesota rule, **we support the Early Action Only Credit Banking System option**. We feel the Early Action Plus One-Time Allotment option goes too slowly and is too timid to address the urgent need to reduce greenhouse gases (GHGs). Our reasons for supporting the rule and the credit banking system are as follows:

1 - **Consumer choice**: The proposed rule only adds choices to the marketplace in Minnesota; it does not decrease choices. Research polling has already shown that 60% of Minnesotans want to buy an electric vehicle. Of those, 66% want more choices than are available in Minnesota now.

2 - **Federal tax credits**. All of the remaining federal tax credits for the different cars not delivered to Minnesota are essentially unavailable to Minnesota citizens. This is truly unfair to us. It skews national competition for cars and disproportionately hurts Minnesotans, compared to residents of states that already receive those cars.

3 - **Equity**: Minnesota's BIPOC, low-income, and other underserved communities most often carry the largest burdens of health effects from decreases in air quality and increases in noise, vibration, and congestion from transportation. All of these factors create individual as well as synergistic health challenges. We have also seen the horror of these increased health burdens creating disparate excess COVID-19 mortalities and more severe illness.

EVs can offset these negative impacts. Over time, greater adoption of EVs will cumulatively decrease these impacts, especially in underserved communities. Minnesota has a significant duty to improve the environment for these communities in our state.

4 - Climate change: There is no question that climate change is real, and that heat-trapping carbon from burning fossil fuels is one of the worst offenders. Taken together, transportation now makes up the single largest percentage of carbon sources in the U.S. as a whole and Minnesota specifically.

5 - Air quality: Good air quality is critical for maintaining a healthy place to live. Internal combustion engines (ICEs) produce not only carbon and heat, but also other deleterious pollutants, such as fine particulate matter (PM2.5 and PM10), carbon monoxide, low-to-the-ground ozone, and sulfur- and nitrogen-oxides. EVs produce none of these air pollutants.

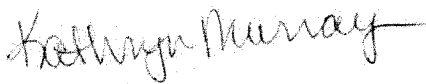
6 - Minnesota has not done nearly enough to mitigate its generation of GHGs in the last 15 years: Minnesota has dropped below the national average in adopting the use of electric vehicles. It has lost its place near the top in improving the environment or in mitigating climate change. During the 2005-2020 period, Minnesota had pledged to reduce greenhouse gases by 15%. However, through 2020, we have only been able to reduce them by a mere 8%, about halfway to our stated goal. We feel Minnesota needs to act now to reclaim its leadership in this, and the rule would help us to do that.

All of these problems are seriously threatening our country, both today and in increasing ways in the future. We cannot afford to wait any longer to ramp up the opportunity for Minnesotans to buy EVs and help change the trajectory toward ruin that we are currently on.

In order for consumers to purchase more clean cars, however, such cars *must be available*. Consumers can show their support for sustainable energy and for decreasing the use of carbon-producing ICE vehicles *only* if the state requires vehicle manufacturers to deliver them to Minnesota, so they are accessible for purchase.

Because of all these factors, our Community Council supports the MPCA rule change, as approved by our board on February 11, 2021. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, reading "Kathryn Murray".

Kathryn Murray, Executive Director
kathryn@sapcc.org | 651-649-5992
www.sapcc.org

The Honorable Jessica Palmer-Denig:

OAH FEB18 '21 AM 8:52

I fully support the Clean Car Rule proposed by the MPCA. In short:

- Improved availability of EV and PHEV models on car lots will lead to
- Higher adoption of electric modes of private transportation, which will indisputably result in
- Greatly reduced CO₂ emissions, which will reduce the rate of global climate change, and
- Greatly reduced particulate and NOx emissions and traffic noise, which will
- Improve the health and living conditions for all, especially the underprivileged among us.

I own an EV and want to share my experience.

I have been active in environmental protection for about a half-century during my profession as a USDA scientist and adjunct faculty member at the University of Minnesota and in volunteer capacities. Despite my knowledge of managed and natural ecosystems and my understanding of Earth systems, I am embarrassed to admit that I did not fully appreciate the causes and impact of global climate change until about 2009. The speed of change is breathtaking.

The disruption we see already pales in comparison to what is to come — I wish this weren't true.

Humans are almost incapable in keeping slowly approaching threats in mind, especially those with invisible causes. So, despite the frequent depictions of climate change and discussion of how to reduce it on nightly TV news, on the radio, and in print, it is easy to discount it, to feel that individuals cannot make a difference. I find that even among my highly educated, well informed friends. But we simply must change our behavior as soon as possible.

My wife and I have taken a lot of personal actions to reduce our carbon footprint – installed solar photovoltaic panels on our garage roof, reduced food waste to nearly zero, stopped subscribing to print versions of the newspaper, reduced and then stopped meat consumption, taking the bus or light rail for local trips whenever possible, never flying unless it's necessary to see family quickly, but instead take Amtrak for long trips, moving to a smaller home, subscribing to Windsource, etc. We are part of a Transition Town group that informs our neighborhood residents and businesses about ways to reduce greenhouse gas emissions – our motto is "Smaller footprint, Stronger community."

The next step was to change what we drove, even though we had cut back to about 500 miles a month. I did a lot of research. I main goal was to avoid use of fossil fuel, if possible. Almost all our driving is in town, but we do like to visit state parks, the North Shore, and friends who live outstate. There were no plugin hybrid vehicles available in Minnesota that had sufficient electric range to cover all of our local driving and we could not afford a new, long-range EV. We finally settled on a used Nissan Leaf with a summer range of about a hundred miles, about 70 in winter.

This vehicle has worked well for us most of the time, but my wife is really stressed by range anxiety, so we're beginning to look for a PHEV. As I experienced a few years ago, it is extremely frustrating that many models are available only in states with clean car rules. I am loath to purchase a vehicle out of state, since I know the need for sales taxes to support government activities here and I am willing to pay them. However, I must admit that I have considered either renting a vehicle to drive one-way or even flying and then drive the new vehicle back. But that's ridiculous and should be unnecessary. The Clean Car Rule would make that unnecessary.

A primary, and crucial outcome of the Clean Car Rule is that more PHEV and EV models would be made available to the dealers and therefore be on the lot for buyers to try. Once someone drives an EV, which is quiet except for the tire noise, which has impressive torque so that getting up to speed when entering a freeway is easy, and which has almost no regular maintenance requirements, I am confident many more will be sold. Once we have a wider range of EVs and PHEVs to choose from, competition will help drive prices down. Increasing new EV and PHEV car sales will generate more used EV and PHEV and hybrid cars at more affordable prices, allowing more people to obtain one. Lower emissions and less traffic noise will benefit people living close to heavily trafficked roads, but also those trying to enjoy the out of doors at restaurants or parks.

The proposed Clean Car Rule will bring benefits locally and globally. The continuing increase in climate-forcing gases like CO₂ is evidence that education and voluntary behavior change is insufficient to reduce the rate of global climate change — some government intervention is required. The Clean Car Rule proposes reasonable and necessary actions toward helping Minnesotans achieve a smaller footprint.

Thank you,



Michael Russelle
2265 Luther Place, Unit 303
Saint Paul MN 66108

February 17, 2021
197 Isabel Street West
Saint Paul, Minnesota 55107

reference: Clean Cars Minnesota
OAH 71-9003-36416

Judge Jessica Palmer-Denig
OAH
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

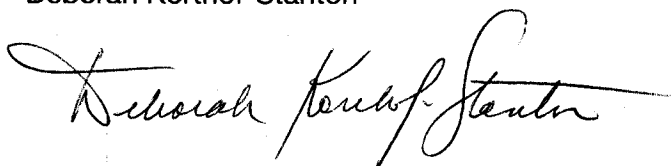
RCVD OAH *21 FEB 19

Judge Palmer-Denig:

I support Clean Cars Minnesota. Clean Cars Minnesota enhances vehicle choice for consumers, it does not limit choice. General Motors, Volkswagen, and Ford are committed to an electric fleet of vehicles and are already reducing manufacturing greenhouse gas emissions (GGE) as well as vehicle GGE. GM announced on January 28, 2021 that all GM passenger cars and sport utility vehicles will be electric by 2035! I want to be able to go to a Minnesota vehicle dealership and purchase the car of my choice, not the car of the dealer's choice: I have had the misfortune of going to a dealership inquiring about a specific zero-emission vehicle (ZEV) only to be told the vehicle is not available in Minnesota and if bought in another state would not be serviced at the dealership.

Purchasing the ZEV of my choice is important because I believe in science and climate change. Minnesota needs to step up and join the fourteen states which are reducing GGE through efforts similar to Clean Cars Minnesota. Minnesota does not have a unique climate or terrain. What is unique to Minnesota: multiple 100-year flood events (during a compact time frame) along the Mississippi and Red Rivers and reduced ice on Lake Superior causing erosion and severe economic damage. Climate change is real and GGE are real; Minnesota needs to be a leader in the Upper Midwest supporting vehicle choice and reduction of GGE toward the goal of lessening human impact on our environment. Clean Cars Minnesota is a small step toward a better future. Let's do the right thing for the environment and adopt the Clean Cars Minnesota rules.

Sincerely,
Deborah Korthof-Stanton

A handwritten signature in black ink, reading "Deborah Korthof-Stanton". The signature is written in a cursive, flowing style with a large, prominent "D" at the beginning.

February 18, 2021

The Honorable Jessica Palmer-Denig
% OAH Legal Assistant Anne Laska
Office of Administrative Hearings
600 North Robert Street
P.O. Box 64620
St. Paul, Minnesota 55164-0620

RE: **Minnesota Pollution Control Agency's Clean Cars MN Rule**, OAH Docket No. 71-9003-36416

I strongly support adopting this rule on electric vehicles (EVs).

In particular, I support the "Early Action Only Credit Banking System" option. I believe that the "Early Action Plus One-Time Allotment" option is too weak. The latter option cannot move Minnesota fast enough to attain our state's reduced emissions goals.

I also support adopting both, the Low Emissions Vehicle (LEVs) and the Zero Emissions Vehicle (ZEVs) standards in the rule. Here are the reasons for my position on this rule:

#1. Lack of Choice: As of 2019, I understand there were only 19 models of EVs available in Minnesota, compared to 43 models available on the national market. But a 2019 *Consumer Reports* (link below) poll found that 60% of Minnesotans who were looking to buy a car were interested in EVs, and 66% said they want more choices in EVs. **How could anyone be against more choices?**

<https://advocacy.consumerreports.org/press-release/minnesota-plan-to-adopt-low-and-zero-emission-vehicle-standards-is-a-win-for-consumers/>

Without this rule, **MN consumers are now losing out on choices.** Extremist fears are unjustified; claims this is an inappropriate 'one-size-fits-all' rule do not pertain. **Creating barriers to consumer choices violates a free market.**

#2. My Own Experience: In November (2020), I tried to find a new Honda Clarity Plug-in Hybrid (PHEV) in Minnesota. I called around to seven Twin Cities Honda dealers, and there were none on any of their lots. I later found out that fewer than 0.7% of all available vehicles were EVs at Minnesota dealerships at that time. Just last night, I did a search on [cars.com](https://www.cars.com) and found out that, again, there are no new Clarity PHEVs available in Minnesota.

#3. Tax Credits: If Minnesotans can't get more EV models which have associated tax credits and other incentives, then **we are being unfairly discriminated against**, compared to residents of other states.

#4. Innovators ('Davids') vs. Special Interests ('Goliaths'): Many people are willing to invest in new innovations and want to leapfrog old technologies. The oil and gas industry (and other special interests) are now spending a lot on media to convince everyone that a 'go-slow' transition from internal combustion engines (ICEs) to electric vehicles is the only safe way to do so. They try to frighten people into thinking that EV technology is not ready yet. **It is unfair for special interests to hold back the choices of MN consumers, just because it could hurt their industry.**
<https://www.vox.com/22260311/oil-gas-fossil-fuel-companies-climate-change>

#5. Climate Change and the Future: I know climate change is real, and I think most Minnesotans do also. *We have seen undeniable trends of warmer and wetter winters here (remember January 2021?), more intense heat and humidity in summers, and greater frequencies of astonishing deluges of rain and all sorts of other extremes in weather (Texas, now!). Across the country, new historic records are being set many times every year.*

The Honorable Jessica Palmer-Denig
February 18, 2021
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Worldwide, the hottest years on record were the last six years. The vast majority (>90%) of all scientists and scientific research on climate indicate these changes have been largely caused by humans. **The future we leave to our children and grandchildren will be dire** if we don't move *much faster* on reducing our fossil fuel emissions.

#6. Better Air Quality: EVs produce significantly fewer emissions than internal combustion engines (ICEs). Our urban air quality (especially where low-income and other disadvantaged groups live) is significantly worse than air quality in high-income areas. **Minnesotans rightfully demand clean air. EVs can make a significant improvement in everyone's air quality as more EVs are adopted.**

https://www.huffpost.com/entry/fossil-fuel-air-pollution_n_6022a51dc5b6c56a89a49185

#7. Pollution and National Security: Less oil means: fewer oil pipelines, fewer oil ('bomb') trains, fewer oil spills, less pollution, less foreign oil, and less stress and spending on our military. Less pollution is a win for our national health. Removing dependence on foreign countries' oil is in our national interest.

#8. New Technologies are Here Now: Recent reports show significant innovations in batteries that will make electric vehicles cheaper and much more competitive to ICEs in only the next few years. (See the articles at the links below.) In one article, the results of a recent poll of 2,000 EV owners show that 91% would never go back to ICEs. Another article cites the vehicle market in Norway reached 54% EVs in 2020. In 2021, Norway is on a trajectory to nearly 75% use of EVs because of the availability of new models and incentives there. A third shows that a battery with a 200-mile range has been developed in a lab with a 5-minute charging time.

<https://www.theguardian.com/environment/2021/jan/22/electric-vehicles-close-to-tipping-point-of-mass-adoption>

<https://www.theguardian.com/environment/2021/jan/05/electric-cars-record-market-share-norway>

<https://www.theguardian.com/environment/2021/jan/19/electric-car-batteries-race-ahead-with-five-minute-charging-times>

#9. Jobs and Displacements: Many opponents to this rule are fearful of job losses. If it might personally affect you, fear is understandable. *But there will be many new job opportunities in moving to EVs; maybe even for you.* Consider that GM has now committed to changing its entire fleet of light duty vehicles to EVs by 2035.

This country has led on many technological changes throughout its history. We have adapted our jobs as well as our economy. Through each transition, we became leaders in the world. China is currently the world leader in solar power. I don't want to see China be the world's leader on EVs and clean energy. **The U.S. should aspire to be the leader in adopting EVs, clean energy and all innovations to reduce the drivers of climate change.**

#10. Environmental Catastrophe Myths: Some opponents of this of rule say that they have read about child labor or horrible environmental degradation where lithium is being mined for the lithium-ion batteries. The truth is that lithium is much more prevalent worldwide than the precious metals in ICE catalytic converters. Lithium can be extracted from ocean water or salty lakes, or it can be mined in Australia or other countries. So lithium does not need to be purchased from countries that exploit children or that refuse to mine using environmentally ethical methods.

<https://youtu.be/2JYNOWOqecE>

The converse of the opponents' argument is actually more accurate. Rhodium and palladium, components in catalytic converters, are extremely expensive because they are rare. They are found in only a very few places in the world; Russia and South Africa produce the most by far. The actual circumstances of precious metal extraction in both countries is difficult for us to know, so it is likely that the production of catalytic converters for ICEs exploits more children and causes worse environmental degradation, compared to lithium batteries.

February 18, 2021

The Honorable Jessica Palmer-Denig
c/o OAH Legal Assistant Anne Laska
Office of Administrative Hearings
600 North Robert Street
PO Box 64620
Saint Paul, MN 55164-0620

OAH FEB22 '21 AM 9:22

RE: Minnesota Pollution Control Agency's Clean Cars MN Rule,
OAH Docket No. 71-9003-36416

Dear Judge Palmer-Denig,

I am writing to express my complete support for the adoption of MPCA's Clean Cars Rule, the proposed standards for low and zero-emission vehicles. More LEVs and ZEVs need to be available to Minnesota consumers, and we need to be able to take advantage of tax credits that exist to make them as affordable as possible.

I have a friend who has made himself the "electric car whisperer," helping people get access to the most affordable EVs wherever they might be available in the Twin Cities. But you shouldn't have to happen to know someone who can be a personal guide in order to find an EV. Doing the right thing for clean air and less green greenhouse gas output should be the *easiest* choice for people who drive personal vehicles, not the *hardest*.

If we are going to have personal vehicles on the road at all as the climate crisis intensifies — as it clearly is, based on the scientific consensus so clearly presented from multiple sources — they should be run from electricity, not internal combustion engines.

Finally, to have this change from ICE vehicles to EVs happen as quickly as possible, I support the Early Action Only Credit Banking option.

Minnesota needs to at least meet — and hopefully exceed — its commitments to reducing greenhouse gas emissions. Transportation is the largest part of our state's emissions, and right now we are badly lagging on our commitments.

I want to be proud of my state's part in fighting climate change, not ashamed. We need the Clean Car Rule and the fastest option to begin to catch up on the commitments we have made.

Sincerely,


Patricia Thompson
Saint Paul

Judge Jessica Palmer-Denig
PO Box 64620
St. Paul, MN 55164-0620

RCVD OAH *21 FEB 19

Dear Judge Palmer-Denig:

I am concerned about the level of air pollution in my community and I understand that transportation is the largest contributor to greenhouse gasses in MN. There are many people, often older adults like myself, who have breathing or lung issues for whom air pollution is a quality of life issue. Just talking about it or yielding to the special interest groups who favor fossil fuel as energy sources is not a sustainable solution I urge you to support a strong "clean cars" rule will reduce greenhouse gas pollution, improve air quality in our communities, and save Minnesotans money at the pump.

I support the MPCA's intent to adopt "Clean Cars Minnesota" as a way to reduce emissions and to increase consumer options for electric and hybrid vehicles. This will help increase the development of electric powered vehicles which will become more affordable through increased demand. By adopting a strong "Clean Cars Minnesota." Minnesota can become a leader in the Midwest and generate important benefits across our state.

Thank you,

Larry Luck
7341 Lyric Lane
Fridley, MN 55432