

Clean Cars Minnesota Rulemaking

The following comments are from MN350 supporters who are under the age of 18 or needed to keep their personal information private.

Questions or follow-up regarding the comments may be addressed to madi@mn350.org or sent to Madi at the MN350 office, 4407 East Lake Street, Minneapolis Minnesota, 55406.

To Jessica

Palmer-Denig

ORH MAR12 '21 AM 8:52

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy.

Hannah Windschitl

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Ron Wetzell

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Ryan West

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. We don't have the luxury of waiting for a natural transition to electric vehicles that I believe would happen eventually (I believe EVs are superior products for many drivers' needs). Though it would be nice to have this happen naturally, unfortunately we need the government to step in greatly accelerate the process. One key aspect to this strategy should be to increase visibility of EVs by requiring manufacturers and dealerships to increase their production and stock of EVs. Many people who would normally buy an EV might not if they are unable to try one at their local dealerships due to lack of availability.

Evan Weiler

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy. Moving on with continued support for cleaner hybrid and non fossil fuels cars is the best way to limit climate impact. We need both direction and support from State and Federal govt.

Robert Walker

I pride Minnesota on being a state full of nature. We have many lakes, parks, and forests, including the Boundary Waters Canoe Area, my home away from home. Even in the city we have trees growing in the sidewalks and dog parks. This aspect of Minnesota is one of the many reasons why I love our state so much. It is incredibly important that we protect our state and the nature within it, especially from climate change. One way to do this is to support the move for Clean Cars. Please support it, I sincerely hope you do. Thank you for your time. Have a good day!

Margaret Walker

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy.

Luke Walker

I fully support Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system and reducing our dependence on fossil fuels. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to make the transition happen faster, so the positive economic and environmental affects happen sooner. Sincerely, Cory Wagner

Cory Wagner

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Tasha Votava

I wish I could purchase an electric vehicle at an affordable price or trade in the car I have so I can stop contributing to my community's poor air, but there are few electric vehicles offered, let alone used and affordable in the cities. We deserve to be able to access the tools we need to protect our health and the environment. I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy. Sincerely,
Clara

Clara von Dohlen

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Eleanor Vadnais

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Summer Thompson

I would love to purchase an Electric Vehicle (EV) but currently there are very few EV options available for purchase statewide. I care deeply about the environment & the impact that I myself have on the Earth. If I could afford an EV or have more options of EVs, I would definitely get one. Right now, the field of choices & options are so limited as well as charging stations across the state are limited. If we truly want to help the world by lowering emissions & our carbon footprint as a state we need to get onboard with Clean Cars Minnesota. Transportation is the largest source of GHGs in Minnesota, and passenger vehicles make up more than half of those emissions. Reductions in transportation emissions are essential in order to reduce the impacts of climate change in Minnesota. We all deserve to have options & we should be striving towards something for the greater common good. Please help us bring Clean Cars to Minnesota & help put our state on the path towards electric transportation.

Sara Thoen

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Isabelle T

As a Saint Paul, MN resident and someone who has to monitor air quality due to my asthma condition this issue is of great importance to me and my family. Don't we want to continue to be able to enjoy our great parks and recreation activities for generations to come?

Ava Suzuki-Lambrecht

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Patrick Stahl

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Noah Spielman

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Sam Shoemaker

I'm a just a kid, but I care about this rule. And I care about stopping climate change. Not just because it could mess up my and other young people's future. Because it's not just a threat for us humans, it threatens the animals that live on Earth. It hurts ecosystems and habitats. It causes natural disasters, like flooding, and makes the world hotter. It's bad for us to have dirty air and to breathe it all the time. Earth is young (it's only about 4.5 billion years old) and we still have so much to learn about it. So many places to explore on it that we've never been before. I've been in northern Minnesota and seen all the world life; the birds chirping, squirrels skittering, and deer hiding in plain sight. Imagine no birds chirping, no sign of wildlife. But if we establish this new rule, it would make Minnesota a lot more environment friendly. The world is a beautiful place that we need to protect.

Alma Sharp

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Teresa Schicker

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Mark Scannell

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Megan Saley

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Natalie Sabes

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Stacy Saathoff

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Rebecca Rose

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Ciclalis Rico

Climate change is impacting the country and the entire world and the fact that we could change how we are impacting these changes in our climate through the use of better, cleaner cars seems to show that we should make every effort possible to do so.

Dorislynn Quinones

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Katherine Pihlaja

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brook pederson

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Lucette Ow

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Ashley Ouellette

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Michael Oaks

It's so important to stop global warming, increase fuel security, and make our air more breathable. Please do everything you can to bring more clean vehicles to Minnesota's roads.

Kathy Oaks

There is more and more infrastructure being invested in electric vehicles, solar, wind and other non-fossil fuel energy. This is a needed change for the future that is going to happen (whether we like it or not). Fossil fuels will eventually run out and it's time to change.

Emily Neuharth

next election. That they will fail in blocking this necessary initiative moving forward is almost certain. But that does not mean they won't also be doing incalculable damage along the way by creating unnecessary fear and anger. By doubling down on a politics rooted in lies and grievance, they are creating for all of us a more difficult world.' <https://minnesotareformer.com/2021/02/17/opponents-of-the-clean-cars-plan-are-using-trumpian-disinformation-opinion/?emci=ae13f63f-bb72-eb11-9889-00155d43c992&emdi=5442e2c5-8774-eb11-9889-00155d43c992&ceid=1400107> I agree with his points and my husband supports this too as we are trying to purchase an electric vehicles this spring! My brother holds back from buying an electric vehicle (not because he does not want to) but because of the lack of choice in our state. He doesn't own a car right now and has limited means of getting around. Having the opportunity of buying an electric vehicle (and having an easier time of going about it) would improve his life a lot (an enable me to see him more often - which I would really enjoy).

Emily Neuharth

Sam Grant said it well: 'Their target at the state Legislature this session is the Minnesota Pollution Control Agency's (MPCA) Clean Cars initiative, which would require car manufacturers to provide more cars, light-duty trucks, and SUVs with lower or zero emissions of greenhouse gases and other air pollutants. A bill being heard in committee Wednesday in the GOP-controlled Senate would stop MPCA from developing the Clean Car initiative. That's a bad idea. Here's why: Due to the high demand for electric vehicles (EVs) in places like China, Europe and U.S. states that have already adopted clean car standards, automakers often don't send their EVs to non-clean car states like Minnesota because their supply is already used up. This leads to fewer options for EV buyers in Minnesota. Stories abound of prospective EV buyers left out in the cold here when it comes to purchasing the car they want. Some have even been forced to head out of state to buy the EV they want. Clean Cars Minnesota would mean more EVs are sent here, thereby increasing consumer choices for those who want them. The way the Clean Car initiative would work is that automakers would be required to produce a certain number of "credits" each year to comply. Credits are calculated based on the type of vehicle — plug-in hybrid or battery electric — and battery range. The lower the emissions and longer the range of the vehicle, the more credits a manufacturer gets. The credit requirements are indexed to an automakers total sales of traditional gas-powered vehicles, so the credit requirement will adjust itself to market conditions, i.e. if fewer gas-powered cars are being sold then the automaker will need to produce fewer credits. This proposal is a win-win for Minnesota. It provides Minnesotans more choices in the cars they drive and will significantly reduce our state's climate pollution, cleaning our air and helping us preserve what makes our state great for our kids and grandkids. It will also serve as an important market signal as the country heads full throttle toward an electric future. Last month, General Motors announced it intends to sell only electric cars and trucks by 2035. Minnesota can be in the vanguard of states adopting these standards and cement its place as a leader in innovation and the rapidly growing clean energy economy. Minnesota Senate Republicans, who for years have blocked any real action on climate change, have decided that they will try to block this one too. They have resorted to spinning ever more fanciful tales about the Clean Cars initiative. Some of them may even believe them. They are sending out videos and writing columns for their local news outlets with outright lies, saying that Clean Cars Minnesota will affect farm equipment (it will not); that it will affect heavy-duty trucks (it will not); that it bans combustion engines (it does not); that it is an end run around the Legislature (it is not); And plenty of others. Sen. Andrew Mathews, R- Princeton, has introduced legislation that would ban the MPCA from protecting Minnesota's air from any auto emissions. This bill is getting a senate committee hearing this Wednesday, and indications are it is a priority for Senate Republicans. Why in the world would we want to prevent the state agency charged with protecting us from pollution from protecting us from pollution? At a hearing of the Senate Transportation Finance and Policy Committee last month, Minnesotans testified about the proposed clean cars rule. Of the 17 testifiers, 11 were in favor of the clean cars proposal. Unfortunately, however, opponents parroted the disinformation they had clearly gotten from those peddling lies. We do a grave disservice to our fellow Minnesotans when we mislead them for political gain, and many of those pushing disinformation are doing so with their eyes on the

Please pass this and support Clean Cars MN so that electric vehicles are more affordable! A factor that holds my mom back in buying an electric vehicle is that they aren't very common. If electric vehicles become more common and accessible, she and others like her will feel more comfortable to get on board with this effort. I believe that electric vehicles are necessary for a successful future and that it will be a technology that leads to many benefits. Many didn't trust computers at the turn of the century and yet we now can't live without them. Please support Clean Cars MN and be a part of a brighter, better future.

Emily Neuharth

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Emily Neuharth

I fully support this and would really like to see Clean Cars MN pass!!

Emily Neuharth

Minnesotans clearly care about the environment. We have some of the healthiest/
most robust laws surrounding aquatic pollution and natural resource protection.
That needs to continue extending to our atmosphere. The political infrastructure
needs to be in place to help expand corporate growth with regards to cleaner cars.
It will both support that economic sector and keep our environment healthy in many
ways.

Brady Nahkala

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Melanie Mozingo

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Kelly Moreno

It is clear that we need to do everything we can to help with climate change. One option is ensuring vehicles are green and we need legislation that can make sure we get that. It is the job of our government to protect the people, and this is a place where we desperately need that.

Olivia Meyer

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Bethany MacDonald

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Marilyn Logan

I'm a Minnesota youth, and I believe it is necessary to limit our car use as a society to create a healthy environment and a healthy population. The health of humans is connected to the health of our environments.

Indigo Liu

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Grace Liu

I was an early adopter to the Prius back in 2004, I understood back then being on a waiting list, but almost 20 years later when electric cars have been proven and are readily available it's ridiculous Minnesota consumers have such limited choices. The demand is there, it's the supply that's lacking. My next purchase will definitely be an electric car and I don't want to have to go to out of state to purchase it! We absolutely need to get off fossil fuels for the sake of the world. I fully support MN adopting the Clean Cars rule.

Judy Lissick

We absolutely need to pass the Clean Cars rule in MN. Fossil fuels are one of the largest sources of greenhouse gas emissions. I purchased a diesel pick up truck 5 years ago because the state did not have adequate options for electric vehicles and I wanted to at least make one step in the right direction with higher miles/gallon. The demand for electric vehicles is there, we need to supply.

Greg Lissick

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Adam Levy

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy. I want my children to experience a better Earth than I do. We need to be reversing climate change in order for that to happen. Lowering emissions must be part of that initiative.

Ray Lauffer

I do not support the adoption of the Low Emission and Zero Emission vehicle standards. The current power source for electric vehicles is less efficient and dirtier than gasoline. Until we can find a viable alternative source to nuclear, coal, and natural gas to produce electricity, it doesn't make environmental sense to switch to electric vehicles. A switch to EV would harm the environment, not help it. Sadly, wind and solar alternative power sources can't replace the dirty but reliable power sources listed above. I personally had very high hopes they would. The Power Companies know this, fully support the alternative energy sources knowing that they will fail which further solidify their grip on the market (when they will say I told you so.) Yet another diabolical corporate plan to increase their power and money. We should be seriously investing the James McCanney Wing Generator (which recently won the xprize) which over comes many of the limitations of the 3 blade wind mill. It's going to be sad to see those giant un-recyclable blades in the landfills... As recently shown in the February 2021 Texas the power grid crisis, the electrical power grid in it's current configuration simply can't support the massive increase in electrical power usage the Low Emission and Zero Emission vehicle standards would impose. When you pull back to see the forest for the trees, you can see that the move to Low Emission and Zero Emission vehicle standards is designed to hurt the environment more, increase car prices so the common people can't afford them, introduce IOT into all cars for tracking and control, and cause power shortages\brown outs. Those proposing the legislation know this, are truly evil, and are take advantage of the well meaning people that support this legislation without knowing it's major disadvantages. I really do care about the environment. When a viable power source is made available and the power grid can handle this increase in distribution I'm 100% on board and will junk my gas vehicles. That being said I don't want to live in the Planned-opolise. I hope someone actually read this. Sadly, it will probably just go down the memory hole. Alex Knutson

Alex Knutson

I've grown up in Minnesota, and I always appreciate our attention to our natural environment. By adopting Clean Cars, we can support our environment and our people by improving air quality. I want my future and everyone's present to be safe, clean, and healthy. For that reason, I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy. Sincerely, Kathryn, 17 years old

Kathryn Kaiser

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy.

Carla Jung

I am a runner and active outdoor recreation enthusiast. As a life long Minnesota resident, I have witnessed the negative impact of air pollution on these activities and the quality of life in our state. I am in favor of the adoption of the Low Emission and Zero Emission vehicle standards. They will help to improve our air quality and provide a reduction in our emission of greenhouse gases.

Michael Joseph

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy.

Daisy Johnson

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Alexandra Johnson

I think supporting clean cars in MN is the right thing to do for the environment and MN consumers! I want more vehicle options in MN and hope to buy an electric vehicle in the future. Until car providers see MN is serious about Clean Cars residents will not have the same options as other states. I hope we can do what's best and keep MN competitive in the market.

Ellen Jaquette

Please pass the Clean Cars Mn proposal from Gov. Walz. Minnesotans want clean air and environment for our children. More future oriented jobs for all citizens and a stable climate are of critical importance. We need this rule so more Low Emissions Vehicles and Zero Emissions Vehicles for sale in MN.

Louise Jankowski

Moving away from fossil fuels as quickly as possible is common sense given the well documented realities of climate change and the potential consequences of it. EVs are also longer lasting and easier to maintain because they have considerably fewer parts than gasoline cars, and cost will only continue to decrease as higher demand will drive larger investment in batteries and other clean technologies.

Juan Izar Tenorio

I fully support Minnesota supporting both standards as a part of the Clean Cars Rule. I have seen firsthand how air pollution affects disadvantaged communities and I think Minnesota should work to protect already marginalized folks. This rule is a step in that direction. Best, Asiya Hussein

Asiya Hussein

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy.

Margaret Huemoeller

If we are going to have any chance of reaching the goals we have set in order to have a livable future for our children and grandchildren, we need to start taking bold action and incentivizing quitting fossil fuels to lower our emissions in the coming decades. We need to make climate friendly choices such as having clean cars easier and more accessible to all, and adopting these rules would be a step in the right direction.

Sarah Howe

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy.

Aija Hodges

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Ellen Hinchcliffe

Over the last decade a new term has entered the public lexicon, which was to my knowledge never really used before. That term is 'Polar Vortex' as emissions have increased the resulting warming of the arctic region has reduced the temperature gradient between the arctic region and the rest of the atmosphere in the northern hemisphere. This trend is responsible for among other things the sub-zero temperatures in texas, destruction of crops in areas not used to hard freezes, etc... So Yes I support the Low emission and Zero emission vehicle standards being adopted in MN. Furthermore, an often ignored aspect of global climate crisis, is that of US National Security readiness. Having plans to attack climate change, and being among the leaders of climate change put us in a more strategically defensive position, not only militarily, but also economically, and food chainwise. Climate change is coming. Scientists have been warning of this longer than I have been alive. Its time to do something about it.

Robert Hembree

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy.

Jennifer Hammer

We're in a critical moment where radical action can create a livable future on earth, or plodding on with the status quo and incremental change will seal our collective fate. I'm in support of adopting the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule as part of overall strategy to reverse negative impacts of climate change including CO2 emissions. As a 27 year old asthmatic in a pandemic, I'm especially compelled to share the intersections of climate change and health. I've lived along a corridor with concentrated vehicle emissions and experienced worse lung health in that location. As for pandemics, as shifting weather and increased human migration – due in part to climate change – alter urban/rural boundaries, opportunity for disease spillover from animals to humans rises. Examples of such spillovers include Ebola and corona viruses (SARS, MERS, COIVD). The impacts of climate change are integrated into daily life and health, and thus every solid and promising strategy to reverse negative impacts of climate change must also be integrated. I hope to live a long and healthy life, but my optimism dims with each missed opportunity for action. Let us work together to not miss this opportunity for change.

Madeleine Hallberg

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Isaac Hale

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy.

taryn gunderson

We need to reduce carbon emissions from vehicles in order to have an effect on climate change. Policy change is the most effective way to do this. Clean Cars are good for our health, our economy and our planet.

Gretchen Griffin

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Nick Gorman

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Barbara Gittens

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Christine Gamm

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Christian Fredrickson

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Emma Erdahl

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Kellie Engelman

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Charlie Egeland

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Zoe Edington

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy. We need more clean cars! More electric cars! Cars that are better for our future. We need to make it easier for everyone to get access to a clean green car. No more fossil fuels. No more dirty energy. No more harmful policies. People over profits.

Taylor Dugger

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy.

Kayla Dile

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Meg DeMarsh

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franny db

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Sydney Davis

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Sophia Curran-Moore

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Emily Corbid

The climate crisis is an immediate threat. I am scared for how climate change is going to destroy so many more lives than it already has. As a high school student who has been advocating for Minnesota climate action for three years, I find it frustrating that Minnesota has not taken bold climate action, we are lagging behind on our green house gas reduction goals. Electric cars is a great step towards reducing our green house gas emissions and air pollution.

Keriann Cooper

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy. Our climate is only growing more operatic. Adapting while ensuring life goes on working means clean cars or bringing back pervasive passenger rail.

John Cirilli

I am 110% in support of Minnesota adopting the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. The sooner we move toward full electrification of our transportation system, the better. We cannot depend on fossil fuels anymore in the face of overwhelming evidence of climate change and its impacts on us today, and on future generations. Taking this step for Minnesota would greatly reduce carbon emissions by one of the most polluting sectors of the economy: transportation. We have seen the significant impact that removing fossil fuel powered cars from the roads could have just in the last year during the stay-at-home stage of the pandemic. We have the electrification technology and capability to continue that trend. Why would we not choose to pursue that healthier, safer future for ourselves and those who come after us? Sincerely, Cecelia Cathcart

Cecelia Cathcart

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy.

Sophie Callahan

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Claire Bromley

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy. A commitment to clean energy is good for everyone, not just Minnesota. If we don't do everything we can, our planet will be uninhabitable by the end of the century.

Elizabeth Bonnemann

Poor air quality has not only affected my own health, but has also exacerbated (if not caused) my mother's asthma. The issue of air pollution will not go away in the coming years. If we want a livable and healthy earth for our kids, and our grandkids, Clean Cars Minnesota is a great step in the right direction. Folks need to be held accountable for their emissions, and be able to readily (and more easily) purchase electric vehicles. I urge you to pass this ruling.

Eva Bombeck

I am fully in support of Minnesota adopting both the Low Emission and Zero Emission vehicle standards as part of the Clean Cars rule. Adopting these rules is an essential step in the electrification of our state's transportation system. Vehicle emissions are the largest source of greenhouse gas emissions in the state, and this ruling would decrease the state's carbon emissions dramatically in the upcoming decades. It also brings important health benefits, decreasing the amount of air pollution our state residents breathe that accounts for 2,000-4,000 more premature deaths annually. We need to take rapid action to prevent the worst effects of climate change. We can and should pursue proven climate solutions throughout the economy.

Eula Blunt

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Abigail Barrs

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Dylan Albright



The Nature Conservancy in Minnesota, North
Dakota, and South Dakota
1101 West River Parkway, Suite 200
Minneapolis, MN 55415-1291
Tel (612) 331-0700
www.nature.org

March 15, 2021

RE: Proposed Permanent Rules Relating to Clean Cars

Dear Judge Palmer-Denig:

Thank you for the opportunity to comment on the proposed Clean Cars Minnesota rulemaking process conducted by the Minnesota Pollution Control Agency (Agency). I am pleased to submit these comments regarding the demonstrated need for vehicle emissions standards in Minnesota on behalf of The Nature Conservancy (the Conservancy). In response to the Agency's Notice of Intent to Adopt a Rule with a Hearing, the Conservancy supports the adoption of low emission vehicle (LEV) and zero emission vehicle (ZEV) standards. If implemented as proposed, the Agency's LEV and ZEV standards will improve climate and health outcomes in the state.

The Conservancy works to protect the lands and waters upon which all life depends to create a world where nature and people thrive. Climate change poses an urgent threat to this work—it threatens both human communities and natural habitats through warming temperatures and more extreme weather conditions. TNC's mission requires us to limit global warming to <1.5°C, and in addition to protecting nature, emissions reduction is a top priority for achieving that target.

Transportation emissions are the largest source of climate change-inducing greenhouse gas emissions in Minnesota. Within the transportation sector, passenger cars and light-duty trucks constitute roughly 60% of emissions. Clean car standards therefore represent a significant opportunity to reduce the largest source of emissions in Minnesota's highest-emitting sector. Implementing such standards are essential to meeting the state's goal of at least an 80% reduction in greenhouse gas emissions from 2005 levels by 2050.

Clean car standards would put Minnesota on equal footing with 14 other states and the District of Columbia, all of which have already adopted clean Vehicle Standards under Section 177 of the Federal Clean Air Act, representing over 30% of new light-duty vehicle sales:

California (2002); New Jersey (2004); Connecticut (2004); Washington (2005); Vermont (2005); New York (2005); Maine (2005); Rhode Island (2005); Massachusetts (2005); Oregon (2006); Pennsylvania (2006); Maryland (2007); Washington D.C. (2007); Delaware (2010); Colorado (2018)

The proposed Clean Cars rule is projected to reduce tailpipe and upstream emissions by 8.4 million tons during the first 10 years, as indicated in the Agency's Statement of Need and Reasonableness. Minnesotans will realize direct health benefits from the accompanying reductions of particulate matter, nitrogen oxides, and other ozone precursors emitted by traditional internal combustion engine vehicles. Negative impacts of air pollution on health outcomes are documented in a 2019 report published by the Minnesota Department of Health and the Agency—*Life and Breath: How Air Pollution Impacts the*

Health of Minnesotans. The report attributes between 2,000 and 4,000 deaths, 500 hospital stays, and 800 emergency room visits to heart and lung conditions related to fine particles in the air or ground-level ozone. Across Minnesota, particulate matter is associated with 10% of premature deaths, and ozone pollution contributes to 1% of all cardiopulmonary deaths. The rule would therefore have a direct bearing on reducing the state's thousands of premature deaths and improve the heart and respiratory health of Minnesotans.

The Conservancy recommends that the Agency proceed with the Clean Cars rulemaking process. We base our recommendation on the anticipated results for emissions reduction, associated direct benefits to human health, and indirect benefits to people and nature through mitigating climate change. We thank the Agency for its thorough scientific study of the implications of Clean Cars rulemaking for the State of Minnesota. These standards will benefit the well-being of Minnesotans and our environment.

Thank you again for the opportunity to provide comments on this important issue. If you have any questions about these comments, please contact me at 218-464-8649 or mcornett@tnc.org.

Sincerely,

A handwritten signature in dark ink, appearing to read "Meredith W. Cornett". The signature is fluid and cursive, with a large, stylized initial "M".

Meredith Cornett, Ph.D.
Director of Conservation Science
The Nature Conservancy in Minnesota

Recipient Information

To: Judge Palmer-Denig
Company: OAH
Fax #: 16515390310

RECEIVED

By: OAH on 3/15/2021 1:16 pm

faxZERO.com
send a fax for free

Sender Information

From: Brad Benn
Email address: Bwmbenn@comcast.net (from 174.53.130.233)
Phone #: 9529131187
Sent on: Monday, March 15 2021 at 2:15 PM EDT

I support Clean Cars MN. I drive an EV but it has been hard to find knowledgeable dealers. The rule does NOT mandate buying electric cars but it makes it easier to find one if you are interested. For health reasons and to keep our planet habitable it's important to cut emissions. This makes it easier for more people.

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By: OAH on 3/15/2021 1:18 p.m.

Fax

TO:	Jessica A. Palmer-Denig, ALJ	FROM:	Gary Anderson
COMPANY:	Office of Administrative Hearings	COMPANY:	Minnesota Assn of Wheat Growers
FAX:	6515390310	FAX:	
SUBJECT:	Proposed Permanent Rules Relating to Clean Cars OAH Docket #71-9003-36416	DATE:	Monday, March 15, 2021

Please accept the attachment as comments to
Proposed Permanent Rules Relating to Clean Cars
OAH Docket Number 71-9003-36416

From: Gary Anderson

Minnesota Assn of Wheat Growers

mnwheat@mnwheat.com

218-253-4311 ext. 1



Minnesota Association of Wheat Growers

2600 Wheat Drive • Red Lake Falls, MN 56750

Phone: 218-253-4311 • mnwheat.org

March 15, 2021

Jessica A. Palmer-Denig
Administrative Law Judge
Office of Administrative Hearings
600 N. Robert Street
P.O. Box 64620
St. Paul, MN 55164-0620

Submitted electronically to:

<https://minncsotaoah.granicusideas.com/discussions>

Re: Proposed Permanent Rules Relating to Clean Cars
OAH Docket Number 71-9003-36416

Dear Judge Palmer-Denig:

The Minnesota Association of Wheat Growers (MAWG) represents approximately 800 wheat growers across the state. On behalf of our members, the MAWG submits the following comments on the proposed Clean Car Rule referenced above:

Minnesota Would Be Ceding Regulatory Authority to California. The 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 (CARB). The CARB is an *unelected and unaccountable* body.

Proposed Rule Part 7023.0150, entitled “Scope and Incorporation by Reference”, contains several specific references to definitions contained in the California Code of Regulations. The California Code of Regulations can be changed at any time, by Californians, without any input or regard for the opinions of Minnesotans. By adopting this rule, the Minnesota Pollution Control Agency would be ceding its regulatory authority to the State of California. While the Minnesota legislature may have given the MPCA the authority to adopt air emissions rules, the legislature very clearly did not give the Agency the power to cede its rulemaking to another State. We believe the Agency does not have the authority to cede its rulemaking authority to another state.

Minnesota has better options than a mandate tied to California rulemaking. At a minimum, we encourage you to acknowledge that the CARB has no accountability to Minnesota voters, meaning that Minnesota lawmakers would have no say in the future of this misguided rule. Instead of ceding control to California, state leaders should work with Minnesota stakeholders to find market-oriented approaches that encourage competition in the vehicle marketplace, without the government dictating consumer behavior.

The CARB Will Eventually Regulate Diesel Engines. The MPCA is currently focusing its attention on gasoline-powered cars and light duty trucks. However, our members are concerned that the CARB will eventually adopt rules restricting or outright banning the sale of diesel engines. Diesel engines are necessary for agricultural work because they produce far more power than traditional gasoline engines, and they certainly produced substantially more power than electric engines. In fact, the CARB is already moving in that direction:

Headline: “California sets rule to add more zero emission trucks.” California regulators approved new rules on Thursday that would force automakers to sell more electric work trucks and delivery vans... The rules require a certain percentage of work truck sales each year to be zero-emission vehicles. Source: Minneapolis *Star Tribune*, June 26, 2020, p. A2

Headline: “Calif. phasing out gas-powered cars.” California will outlaw sales of new gasoline-powered passenger cars and trucks by 2035, Gov. Gavin Newsome announced Wednesday... Newsome’s order directs the California Air Resources Board to develop and approve regulations to meet the 2035 deadline. **He also ordered them to make a [new] rule requiring all medium and heavy-duty trucks be 100% zero-emission vehicles by 2045** “where feasible” (emphasis added). Source: Minneapolis *Star Tribune*, September 24, 2020, p. D1

As these articles indicate, the unelected and unaccountable CARB is already moving towards eliminating the use of diesel trucks pursuant to the directive of a single individual: the Governor of California. Our members are rightly concerned that the CARB will outlaw the use of diesel trucks, and eventually the use of off-road diesel engines in farm machinery such as tractors and combines.

The Clean Car Rule Would Put Minnesota Producers at a Competitive Disadvantage.

Because electric vehicles are more expensive than traditional internal combustion engines, our members would be at a competitive disadvantage with farmers in neighboring states who won’t be forced by the government to purchase electric vehicles for use on their farms. This counterproductive rule would harm Minnesota’s farmers, automakers and dealers, consumers, energy suppliers, among other constituencies.

The Proposed Rule Conflicts With the Goals of the Governor’s Advisory Council on Biofuels.

Governor Walz’s Advisory Council on Biofuels released a consensus report last fall. The 15-member Council was created to recommend policies to accelerate achievement of Minnesota’s biofuels and greenhouse gas reduction goals. The report outlines the steps need to grow the State’s biofuels industry, including an acceleration towards E15, adopting a low carbon fuel standard, increasing the use of biofuels in the State’s fleet, increasing public understanding and marketing of biofuels, and developing advanced biofuels. Members of the Council represented the biofuels industry, agricultural groups, the service station industry, the forestry industry, and environmental/energy organizations.

Rural Minnesota could be particularly hard hit along with the state’s agricultural sector. Data from the Agricultural Retailers Association shows that U.S. net farm income could decrease up to \$27 billion if bans on combustion-powered vehicles like California’s were to be established nationwide. If states adopt California’s path, demand for corn could fall by up to 2 billion bushels, while soybean consumption could decrease by up to 470 million bushels. And as

the nation's fourth largest ethanol producer, Minnesota has much to lose from reduced fuel use. Ethanol supports 19,000 full time jobs in the state and accounts for more than \$2.3 billion in state gross domestic product annually. Many of our members also produce corn and soybeans, and as a result they would be negatively impacted by the adoption of the proposed rule.

Emissions Decisions Are Best Left to the Federal Government. Adoption of this proposed rule will clearly make Minnesota an island. Any efforts made in Minnesota will ultimately help residents living East of our state due to the western prevailing winds. President Biden has made climate change a top priority for his administration. While we are not endorsing anything that may come forward from the Biden administration, we do believe that it is better to have this be a national policy rather than a state-by-state effort.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Anderson", with a long horizontal flourish extending to the right.

Gary Anderson
President
Minnesota Association of Wheat Growers

Recipient Information

To: Judge Palmer-Denig
Fax #: 16515390310

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By: OAH on 3/15/2021 1:50 pm

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Sender Information

From: Rebecca Larson
Email address: rebeccalarson2@me.com (from 98.240.210.54)
Phone #: 6512265570
Sent on: Monday, March 15 2021 at 2:49 PM EDT

SUBJECT: Clean Cars Minnesota, MINNESOTA Rules, chapter 7023; Revisor's ID Number 04626
OAH Docket No. 71-9003-36416

I SUPPORT the Clean Cars MN Rules. I think we should have more ZEV and LEV vehicles in our state, making MN the first state in the Midwest to lead the way on climate action. I recently tried to buy a hybrid Subaru and found that I could buy the model I wanted in Oregon or on the east coast, but not Minnesota. I don't understand why as a consumer I am not given the option to buy clean cars here.

We know that:

- Passenger vehicles (the cars, pickups, and SUVs we drive daily) create the largest share of #greenhousegas emissions in surface transportation in our state. Clean Cars MN will provide more options in electric/electric-hybrid options for consumers.
- Tailpipe pollution from vehicles causes smog (ground-level ozone) and contributes to health problems like asthma for thousands of Minnesotans.

We need Clean Car Action in Minnesota. Thank you.

Rebecca Larson

St. Paul, MN 55105

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Pipestone County
Pipestone MN 56164
507-825-1200
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www.pipestone-county.com

Pipestone County

Fax

RECEIVED

By: OAH on 3/15/2021 1:01 PM

To:	Honorable Jessica Palmer-Denig	From:	Steve Ewing
Fax:	651-539-0310	Pages:	4
Phone:		Date	3/15/2021
Re:	Docket #71-9003-36416	cc:	

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Judge Palmer-Denig

Please accept the attached letter on behalf of Minnesota Rural Counties Chairman, Luke Johnson for comment regarding the Clean Cars MN proposed rule.

Thank you,

Steve Ewing

Pipestone County Administrator

March 15, 2021

Docket Number 71-9003-36416

The Honorable Jessica Palmer-Denig,

Minnesota Rural Counties supports legislative review for issues of consequence to the culture and economy of rural counties. MRC opposes the proposed Clean Car Minnesota (CCM) rule based primarily, but not specifically, on the fact that it is being implemented through rule-making as opposed to the legislative process.

The proposed CCM rule is sweeping in scope, imposing changes that affect or potentially affect commerce, self-governance, environmental and national security concerns, utility demand and reliability, battery disposal costs, public and private costs per vehicle concerns, and humanitarian concerns over slave labor in foreign countries.

The rule making process is an effective tool in providing clarity and uniformity toward filling in the details of legislative intent that were not put directly into statute. But it is not a process designed to establish new law, and it is especially not a process to establish new law that would be considered controversial, or highly controversial if introduced in bill form – which is the format best-suited to address this far-reaching initiative.

The legislative process, with the inherent public awareness and public involvement it brings through local and state media, the healthy daylight and the give and take of committee hearings, and most importantly, the consideration by leaders elected to office for the purpose of making laws of the type that would effectively be put in place with the implementation of this rule is far and away the best process for this complicated and far-reaching policy and finance question.

The CCM rule proposes to reduce air-pollution from vehicles in the state by linking Minnesota standards to the California regulatory code, thereby affecting the type of vehicles allowed to be sold in the state.

The following are concerns we have in addition to those listed pertaining to process.

Self-Governance: Minnesotans have a north-woods, mid-west mentality, a long history of successful self-governance, and very little in common with California. One certainty about the California rules CCM is asking Minnesotans to adopt is that the next iteration will include Governor Newsom's total ban on gas-powered vehicles by 2035. If we decide to follow California's standards, Minnesota would have to wholly comply with this ban or revert back to the federal standards. We cannot amend or change California rules in order to address any Minnesota-specific concerns.

Jurisdiction: These are sweeping changes with the potential to bring significant, long-term impacts to rural citizens, businesses and local governments, and that demand the deep review, broad input and public scrutiny that can only be afforded through the legislative process.

Increased Cost: MPCA's Statement of Need and Reasonableness (SONAR) on CCM says ALL gas-powered vehicles will be made more expensive by the LEV rule, by an average of \$1,139. Further, it provides no indication of what the price increase will be for medium-duty trucks under ZEV. Allowing states to regulate car emissions artificially increases prices in states with higher standards. Currently the price difference between electric powered cars compared to gas-

powered cars vary from \$6,000 to \$17,000, or more in initial purchase price. Higher prices will make driving unaffordable for more Minnesota residents. While the LEV or ZEV standards will not apply to used vehicles, used vehicle prices are likely to increase as demand increases by people not able to afford a new vehicle.

Higher new vehicle costs also mean higher sales tax, vehicle registration fees, and insurance costs, which add to the financial burden for many residents.

Considering the state legislature has inadequately funded roads and bridges for decades, the question of who will pay for the additional electric generation, transmission and statewide network of charging stations needed to fuel the change-over from gas-powered to electric vehicles is significant.

Increased electric rates have already driven timber and other industry decisions to expand elsewhere, taking jobs and livelihoods with them. Consumers already burdened by increased rates cannot be expected to shoulder these potential additional costs.

Throughout the SONAR, MPCA makes claims that increased electricity demand will exert downward pressure on electricity rates; this seems contrary to the concept of supply and demand where increased consumption of a finite resource tends to increase prices. This has been the case for Minnesota's electric rates for many years now.

Add to that the fact that California gas prices are twice what gas prices are in Minnesota; Minnesota residents don't deserve to take on these costs when we have some of the cleanest air in the country.

Reliability: Reliance on electronic vehicles seems contradictory to reality when power outages occur. People with electric vehicles would not be able to charge their vehicles to respond to or flee a disaster situation. Additionally, while it would be cheaper to charge an EV battery at night when demand is low, for rural residents traveling longer distances it is likely they would need to charge during the day when rates are the highest.

Battery technology itself is a problem. The battery for a Tesla S model weighs 1,200 pounds and cost \$15,000. Cold weather decreases battery lifespan because it will require charging more often. Lithium-ion batteries optimally function between 32-80 degrees fahrenheit; a battery that provides 100% capacity at 80 degrees will typically deliver only 50% at zero degrees. Charging at temperatures of 40 degrees below zero are not practical or in many cases even possible. With EV battery costs between \$5,000 and \$15,000 or more, any reduced life will significantly burden EV owners financially.

Practicality: The time element of recharging the batteries is a significant burden. A level 2 charging station with an average cost to install of \$5,000 to \$6,000 usually takes 4 to 8 hours to fully recharge a battery. With many EV's having an electric only range of 50-125 miles, a trip from many parts of Greater Minnesota to the metro area would be measured in days rather than hours – reminiscent of travel time in stage coach days.

Even with the longer range EV's that may go 250-300 miles on a charge, it would still take all day and possibly into the night to make one round trip to the metro area from Greater Minnesota. Level 3 charging stations can provide an 80% charge in 30 minutes, but take longer in cold weather. They cost around \$50,000 per station but they are not compatible with all

vehicles since there is no industry standard. Faster charging also increases the rate which an EV's battery capacity will decline, leading to more costs in a shorter time frame.

Safety and Disposal Concerns: Lithium-ion batteries are known to pose a fire or explosion hazard and can release toxic fluoride gas if they do ignite.

Costs of material recovery is a challenge for recycled batteries and trying to recycle batteries of half a ton or more in weight is nearly impossible for most people. Disposal costs and long-term liabilities are a large concern to Minnesota counties.

Human Rights / National Security: EV batteries contain a number of rare earth metals and China, which has a terrible record of human rights abuse, mines 70% of all rare earth metal global exports, and refines 80% of rare earth metals. The U.S. imports a full 80% of its rare earth metals from China. China also controls 60% of the world's processing of Lithium.

Batteries also contain cobalt, 65% of which comes from the Democratic Republic of the Congo which uses child labor in production and is a country in which the United Nations still maintains a peacekeeping presence.

China has stated they are willing to use rare earth metals as trade leverage or possibly curtail the sale to countries who are not friendly. Do we as a nation want to rely on technology so heavily controlled by a foreign adversary, or that is produced on the backs of child or slave labor?

CCM vs. EPA: Not adopting CCM does not mean Minnesota emission standards are not regulated. It simply means Minnesota standards continue to be regulated by the EPA - just as they are now. We support retaining EPA standards and oppose adopting the Clean Car Minnesota proposed rule.

Sincerely:

A handwritten signature in black ink, appearing to read 'Luke Johnson', with a long horizontal flourish extending to the right.

Luke Johnson,
Chairman, Minnesota Rural Counties

F A X



**Minnesota Petroleum
Marketers Association**

3244 Rice Street
St. Paul, MN 55126-3047
(651) 484-7227 or (800) 864-3813

To: Judge Jessica Palmer-Dening
Fax number: 651-539-0310
E-mail:

From: Tim Gross
Fax number: 651.484.9189

Date: 3.15.21

Regarding: **Docket number 71-9003-36416**

Number of pages including cover __3__

Comments:

Attn: Denise Collins



MINNESOTA PETROLEUM MARKETERS ASSOCIATION

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By: OAH on 3/15/2021 12:53 PM

3244 RICE STREET
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March 15, 2021

Judge Jessica Palmer-Denig
Office of Administrative Hearings
ATTN: Denise Collins
P.O. Box 64620
St. Paul, Minnesota 55164-0620
FAX: 651-539-0310RE: **Docket number 71-9003-36416**

The Minnesota Petroleum Marketers Association (MPMA) is made up of 450 multi-generational, family businesses and farm COOPs that provide the liquid fuel needs to residential homes, businesses, and farms across all parts of Minnesota. Our members are also the owners and operators of the majority of the 2,300 convenience stores found in our state. The Association's members are the experts when it comes to providing the energy needs for Minnesota's transportation system.

All Minnesotans want clean air - that includes all MPMA members. We are all united in that cause.

That being said, our Association would respectfully like to raise four major areas of opposition and concern if Minnesota adopts California's Emission Standards and takes on the Clean Car initiative:

- 1) First, why is this important issue of adopting California's Emission Standards being done by rulemaking within the MPCA? The importance of this topic should clearly be addressed legislatively with input and discussion from our elective officials and all Minnesotans.
- 2) Our Association believes studies are needed to review the effect on all energy stakeholders in relation to the net effect on the environment before Minnesota adopts the California Emissions Standards. We know the high costs California residents pay for fuel. We fear the same high fuel costs may be experienced in Minnesota - with most of the burden shouldered by rural Minnesotans.
- 3) In addition, the Clean Car policy, with its electrification of the transportation sector, only provides for one solution for a reduction of air pollutants and carbon emissions. Our members are the liquid fuel suppliers for the state. We are proud to provide the renewable, clean burning biofuels for which Minnesota's energy consumers demand. These products include E15, E85 and B-20 (biodiesel). The Governor has provided the leadership to expand of the use of biofuels in Minnesota because biofuels provide:
 - a) A clean burning, lower emission fuel
 - b) A truly renewable fuel produced in Minnesota's own back yard
 - c) A product that supports our Minnesota farm families
 - d) A cost savings to consumers



MINNESOTA PETROLEUM MARKETERS ASSOCIATION

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- 4) Even without California's Emission Standards, electric vehicles will play a future role in transportation. When the EV demand requires charging infrastructure, the Association's members are the ones that will fill that need. Infrastructure funding provided by federal, state, and local initiatives should be directed to our industry - the industry that provides the current and future energy needs of Minnesota's transportation system.

Our Association wants to stress that there are other options to reduce air pollutants and reduce carbon emissions other than just moving our transportation system to electric vehicles. Every electric vehicle on the road reduces the opportunity and ability for our members to provide the renewable, clean burning biofuels in our state. Liquid fuels have an important role to play in Minnesota's transportation future.

Finally, to emphasize, the adoption of California's Emission Standards is far too important of a subject to not include our lawmakers. By going through the administrative rule making process, the MPCA and the administration is circumventing the legislature's input and the right of Minnesotans to have their voices heard. This process is not in the best interest of Minnesotans.

Thank you for considering our concerns.

Sincerely,

A handwritten signature in black ink that reads "Timothy Gross".

Timothy Gross
Executive Director