

March 5, 2021

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Office of Administrative Hearings Attn: Denise Collins PO Box 64620 St. Paul, MN 55164-0620

Dear Ms. Collins,

I'm writing to provide comments related to the MN Clean Cars Rulemaking on behalf of Greater Mankato Growth.

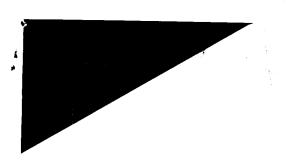
In December of 2020, the attached letter was sent to Governor Tim Walz. This correspondence is being provided to include as a written comment as part of the public hearing process where comments are being taken now through March 15.

Thank you for your consideration of this letter/feedback.

Sincerely,

Jessica A. Beyer

President & CEO, Greater Mankato Growth





December 18, 2020

Governor Tim Walz 130 State Capitol 75 Rev Dr. Martin Luther King Jr. Boulevard Saint Paul, MN 55155

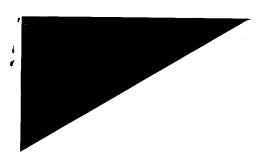
Dear Governor Walz,

Greater Mankato Growth serves as Mankato area chamber of commerce and represents nearly 1,000 businesses throughout the Greater Mankato area, with a mission to support and promote the economic growth and vitality of our members and the regional marketplace. On behalf of our organization, I am writing today in to provide comment on the Clean Cars rulemaking.

Greater Mankato Growth, Inc. understands that climate change is an issue and that there is a need to lessen our carbon footprint. However, we respectfully request that the MN Pollution Control Agency (MPCA) does not proceed with the proposed rulemaking regarding the California motor vehicle emissions standard. We believe that a significant new set of rules, such as this, should be deliberated by the elected legislators who live and work in our shared communities. This specific change in public policy would allow another state to dictate our regulations that could put Minnesota businesses at a competitive disadvantage, especially with bordering states. Instead, Minnesota policy makers should work with impacted stakeholders to find ways to address climate change in ways that minimize adverse economic impacts and take into consideration the needs of Minnesota residents and businesses.

Our organization believes that this is not the time to impose additional uncertainty and regulations. Our economy has taken a serious hit by COVID-19 and our job creators, their employees, and our communities are hurting. Imposing new costs on our business community and workforce during a time like this would have a tremendously negative impact on our ability to revive this economy.

info@greatermankato.com 3 Civic Center Plaza, Suite 100 Mankato, MN 56001 507.385.6640 greatermankato.com





We ask that you reconsider imposing these regulations and that you strongly consider the ramifications and precedent of the proposed rulemaking.

Sincerely,

Jessica Beyer, President & CEO Greater Mankato Growth, Inc.

info@greatermankato.com 3 Civic Center Plaza, Suite 100 Mankato, MN 56001 507.385.6640 greatermankato.com Office of Administrative Hearings ATTN: Denise Collins PO Box 64620 St. Paul MN 55164 – 0620

Dear Denise,

My name is Case Muscatell. I am a fourth generation auto dealer with locations in Moorhead and Hawley, MN. I grew up in the great state of Minnesota and the automotive business has always been a part of my life. Our family has been a part of the automotive industry since the time horses were traded in on cars. We have been proud to call Minnesota home to our family business.

The reason I am writing this letter is make my families voice heard in regards to the potential radical change the Minnesota Pollution Control Agency has proposed in regards to vehicle sales in the state of Minnesota. Adopting the California Emissions standards would have a devastating impact on our family business. Equipping every new vehicle sold with dual Catalytic converters or partial zero emissions technology is expensive. It would on average raise the price of every new vehicle we sold \$800 in the current market. This is without figuring in rising prices of materials especially coming out of COVID. We are a border city to North Dakota and only 60 miles from the South Dakota border. A customer could drive a mile over to North Dakota or 60 miles to South Dakota to save \$800 on the price of a vehicle. Our industry is hyper competitive and only getting more so with the internet making it possible for any consumer to get multiple quotes from multiple dealers in minutes. We gain or lose deals over a couple hundred dollars, much less \$800.

The problems don't stop at price. It would not only hit consumers in the pocket it would also knock out vehicle availability for our consumers. This problem is twofold. First off, we would have to start carrying more vehicles consumers really don't want in our market. The average turnaround time from delivery to sale on a hybrid vehicle at our dealerships is currently double that of a standard gas engine. Being this far north many of our consumers don't trust the limited capability of battery power in severe cold. The second issue this causes is we would no longer be able to trade vehicles with our dealer partners in North Dakota or South Dakota. They would not be willing to take back our higher cost vehicles on trade. Minnesota consumer choice and inventory options would be cut in half.

Owning a Subaru franchise we do our best to follow the corporate mantra and try to leave the world a better place than we found it. My family and our staff members enjoy and give back to our many state parks and waterways through multiple programs we fund and are an active part of. The issue we have is our state is a very clean place. This is <u>NOT NECESSARY</u> as our air quality is currently some of the best in not only the country, but the world. We do not currently have a single area in the state where air pollution is a problem.

It is totally unreasonable to take control out of our own hands and hand it over to the California Pollution Board. We are Minnesota we are not California and we take pride in land and air. Our family also doesn't see a point in having California become our oversight when the federal government has already said they will be looking at the very issues we are discussing.

Again, we have enjoyed being a Minnesota dealer, but with the clear competitive disadvantage this would cause for us we may consider leaving Minnesota and relocating to a more common sense and business friendly environment.

Thanks,

Case Muscatell

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

OAH MAR15 721 AM 8:59

Re: 36416 Pollution Control Agency Notice of Hearing: Greenhouse Gas Emissions

I am writing in opposition to the rules being proposed to adopt the California standards for vehicles. As a 58 year resident of this great state I implore you to put more thought into this and not put us at the mercy of California one of the "dirtiest" states for air quality in the nation. Kind of makes one wonder if this even works for them?

For a majority of Minnesotans, the upfront price is the most important factor when considering what vehicle to buy. California-certified vehicles will cost anywhere from \$800-2,500 more, putting newer and cleaner cars out of reach of some Minnesotans.

- California will decide how many electric vehicles must be offered for sale in Minnesota, limiting the availability
  of top-selling pick-up and SUV models from showroom floors.
- Minnesotans strongly prefer to buy trucks, with annual sales rates of over 82% versus California's 55% purchase rate. The reason behind this is a rugged car is necessary for what is needed to drive in Minnesota weather, specifically winter weather, and to perform many of the required tasks needed for certain jobs requiring larger vehicles. I know of people here who are unable and scared to drive with a car that meets these standards. I can only imagine there are many more.
- CARB's rules are meant to address California's worst-in-the-nation air quality. Minnesota boasts 10 of the
  cleanest counties for ozone air pollution; California has 18 of the dirtiest. Yet the MPCA wants us bound to
  California's tailpipe emissions rules. If we're a clean air leader, why would we subject our state to the rules of
  the dirtiest one?

Minnesotans are overwhelmingly opposed to this idea, too. A statewide survey shows:

- Only one out of nine Minnesotans want to bypass the legislature and move quickly to adopt the California standards.
- Two-thirds of the respondents believe that if the state wants to promote electric vehicles, it should pursue a system of incentives, which it can control, rather than mandating supply as California tells us.
- Just 5% of Minnesotans are very likely to include electric vehicles among the choices for their next car while
   California has decided dealerships must stock anywhere from 8-12% electric vehicles in the coming years.

With motor vehicle sales down over 40% due to COVID and affordability concerns, the Walz Administration's commitment to move forward with a California policy that will increase the cost of vehicles by hundreds, and potentially thousands, of dollars is tone deaf.

Higher costs, less choice, and no voice. There is a better way for Minnesota to go than becoming one with California. Why not put together a commission to find that better way? One that includes both sides of the political realm, representatives from the public and other agencies that represent professions that require a larger vehicle.

Sincerely,

Bonita Harvieux Lino Lakes, MN March 11, 2021

RE: Submission of a Public Comment on the MPCA Clean Cars MN

Administrative Law Judge Jessica Palmer-Denig,

OAH MAR15 \*21 AM 8:58

PO Box 64620.

St. Paul, MN 55164-0620.

Dear Administrative Law Judge Palmer-Denig:

I would like to submit my personal comments in regards to the MPCA proposed adoption of the Clean Cars Minnesota rule as follows:

I strongly support the Minnesota Pollution Control Agency's intention to adopt "Clean Cars Minnesota."

I am a concerned Minnesota citizen that cares deeply about the environment. I feel as Minnesotan we need to do something to reduce the level of air pollution in our state and in my local community. I understand that transportation is the largest contributor to greenhouse gasses in Minnesota. I feel that this proposed rule change is necessary to help us reduce emissions in our state by providing Minnesota consumers increased options for electric and hybrid vehicles.

The air pollution causes major health problems for many Minnesotans and disproportionally affects low income communities and communities of color. I feel that a strong clean cars rule is necessary to reduce gas pollution, improve air quality in our communities, and ease the health burdens being placed on many Minnesotans. As someone that lives in the Urban core, air pollution from transportation is very noticeable and personally impacts my health and the health of my neighbors on a daily basis.

I support the MPCA's intent to adopt "Clean Cars Minnesota" as a critical way to make real progress in Minnesota to reducing greenhouse gas emissions from transportation in Minnesota. By adopting a strong "Clean Cars Minnesota," Minnesota can become a leader in the Midwest and generate important benefits across our state. We need to do more to reduce air pollution and protect the environment for all Minnesotans and for the next generations as well. The adoption of the Clean Cars Minnesota rule is one Marty Roers necessary step to doing this.

Thank you, Marty Roers

1034 Milton Street North St. Paul, MN 55103

Mike Ullmer and Family 27201 County Highway 9 Lake Park, MN 56554 3-8-21

Sincerely, Mike Ullmer

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

OAH MAR15 721 AM 8:56

Honorable Judge Palmer-Denig,

Respectfully, I am asking for your denial to accept the clean cars act as written. I believe that the SONAR is skewed to make the BEV's look better than they actually are with the technology and the statewide infrastructure that we have at this time. BEV's have their place and it is in the states larger cities with concentrated populations and where there is a charging station and road assistance nearby. Logically, the urban cities (St. Cloud, Duluth, MpIs/St.Paul, Rochester) are where a greater amount of the transportation pollution takes place. Start there and please stop treating the entire state as equal offenders to climate change. Ideally, the MPCA would start with requiring every state agency to solely use EV's to do tests to create real data on the viability of EV's for the remainder of the state, not the hypothetical data that is proposed in much of their report.

Consider this, according to the American Automobile Association (AAA), the average battery drive time is reduced by 41% when the temperature drops to 20F (see Consumer Affairs). If you have lived in Minnesota for any duration, you will know that 20F (or colder) lasts from late November to Mid-March. The average EV battery is good for 200miles under ideal conditions. From a safety standpoint, if one did a bit of math, the average daily drive to work and back could be no longer than 128 miles under Ideal winter conditions. I was trained to watch the fuel gauge when driving in winter, 1/3 tank to destination, 1/3 tank return from destination, 1/3 tank reserve. In this scenario one would be pushing into the reserve every day on the way home from work. That would have been me for a majority of my teaching career as I live in very rural MN. For daily driving I could not trust a vehicle for such knowing that I could be putting my family's welfare in jeopardy due to the small reserve capacity of the battery. In general, my bet is inexperienced EV drivers will succumb to exposure of the elements in rural MN where I live. I have daughters that are learning to drive, this would be the last type of vehicle I would put them in during the winter.

One final word, the SONAR report talks about manufactures achieving "Credits" for the sale of electric vehicles. It obscurely states that if enough electric vehicles aren't sold as compared to internal combustion engine vehicles (ICE), the manufacture will be charged for negative credits. This is WRONG for businesses to be punished for a product that the consumer will not purchase. I know that there are many that have stated that they want them (at least in the SONAR and in the Chat room) but, in reality, how many people are willing to take the risk of driving one of these in greater MN with the elements and the lack of charging stations in rural areas for wintertime travelers.

**Reference: Consumer Affairs** 

https://www.consumeraffairs.com/news/electric-vehicle-batteries-perform-worse-in-cold-weather-aaa-study-finds-020819.html

To: Judge Jessica Palmer-Denig Company: Office of Administrative Hearings Fax #: 16515390310

Sender Information

From: Jennifer O'Brien Company: J. OBrien Design, Ilc Email address: jobrienreg@gmail.com (from 68.46.2.208) Phone #: 6128196347

Sent on: Saturday, March 13 2021 at 4:05 PM EST



Dear Honorable Judge Palmer-Denig

RE DOCKET NO 71-9003-36416 Clean Cars MN

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

**OAH Docket No.** 71-9003-36416

I'm writing in SUPPORT for Clean Cars MN

Honorable Judge Jessica Palmer-Denig, Administrative Law Judge Office of Administrative Hearings
Attn: Denise Collins
600 N. Robert Street
P.O. Box 64620

St. Paul, MN 55164-0620 Fax: 651-539-0310

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

OAH Docket No. 71-9003-36416

Dear Honorable Judge Palmer-Denig,

I'm writing to share my **support for Clean Cars MN**: the proposed amendments adopting low emission and zero-emission vehicle air pollution standards which would deliver vehicles to Minnesota that produce lower greenhouse gas emissions and air pollutants.

Currently transportation exhaust from cars is the largest contributor of carbon and pollution in our state. Remember those air quality warnings recently? Even with fewer people commuting during COVID, the Twin Cities still battles with air pollution and the fallout of poor health in our communities. Switching to electric cars & vehicles will make a huge difference and something the average person can do in our communities (whenever they're ready).

Clean Cars MN will make it easier to even FIND an affordable electric car in our state. Having gone through the process of buying my electric car recently, it was a huge hassle to even find one available in my price range since there are NO dealers with any incentive to bring them to our state. In the end, after much research and hunting, I was able to find a reasonably priced car in *New York City*. Clean Cars MN will make it easier for the average consumer to find more options *locally* and make a significant action toward lowering greenhouse emissions.

Minnesota needs to be a leader in the midwest on taking meaningful steps on climate action, and Clean Cars MN is a path in that direction.

Sincerely,

Jennifer A. O'Brien Edina, MN 55435

FaxZero.com

p.1



To: Judge Jessica Palmer-Denig Company: Office of Administrative Hearings Fax #: 16515390310 Sender Information

Recipient Information

From: Jennifer O'Brien Company: J. O'Brien Design, Ilc Email address: jobrienreg@gmail.com (from 68.46.2.208) Phone #: 6128196347

Sent on: Saturday, March 13 2021 at 3:36 PM EST

To Honorable Judge Palmer-Denig,

Attached is my letter in support for Clean Cars MN: Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards - Clean Cars Minnesota, Minnesota Rules, chapter 7023; Revisor's ID Number 04626. Docket No. 71-9003-35415.

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Honorable Judge Jessica Palmer-Denig, Administrative Law Judge Office of Administrative Hearings
Attn: Denise Collins
600 N. Robert Street
P.O. Box 64620

St. Paul, MN 55164-0620 Fax: 651-539-0310

13-Mar-2021 20:37

RE: Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards - Clean Cars Minnesota, Minnesota Rules, chapter 7023; Revisor's ID Number 04626. **Docket No. 71-9003-35415.** 

Dear Honorable Judge Palmer-Denig,

I'm writing to share my **support for Clean Cars MN**: the proposed amendments adopting low emission and zero-emission vehicle air pollution standards which would deliver vehicles to Minnesota that produce lower greenhouse gas emissions and air pollutants.

Currently transportation exhaust from cars is the largest contributor of carbon and pollution in our state. Remember those air quality warnings recently? Even with fewer people commuting during COVID, the Twin Cities still battles with air pollution and the fallout of poor health in our communities. Switching to electric cars & vehicles will make a huge difference and something the average person can do in our communities (whenever they're ready).

Clean Cars MN will make it easier to even FIND an affordable electric car in our state. Having gone through the process of buying my electric car recently, it was a huge hassle to even find one available in my price range since there are NO dealers with any incentive to bring them to our state. In the end, after much research and hunting, I was able to find a reasonably priced car in New York City. Clean Cars MN will make it easier for the average consumer to find more options locally and make a significant action toward lowering greenhouse emissions.

Minnesota needs to be a leader in the midwest on taking meaningful steps on climate action, and Clean Cars MN is a path in that direction.

Sincerely,

Jennifer A. O'Brien Edina, MN 55435

To: Judge Palmer-Denig Fax #: 16515390310

Sender Information

From: Sue Scott

Email address: suescottmn@gmail.com (from 68.46.101.29) Phone #: 9529421858

Sent on: Monday, March 15 2021 at 4:14 PM EDT

RECEIVED

I am wirting in support of Clean Cars Minnesota, MINNESOTA Rules, chapter 7023; Revisor's ID Number 04626 OAH Docket No. 71-9003-36416 , Passenger vehicles create the largest share of greenhouse gas emissions and it is critical we do all we can to tranistion to cleaner vehicles.

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

**Sender Information** 

By: OAH on 3/15/2021 3:21 PM

From: William Slerks
Company: Personal
Email address: wsierks@comcast.net (from 75.73.194.76)
Phone #: 6125087106

Sent on: Monday, March 15 2021 at 4:18 PM EDT

I STRONGLY SUPPORT THE MPCA'S CLEAN CAR RULE! See attached comment

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15-Mar-2021 20:20

I STRONGLY SUPPORT the proposed Clean Cars MN Rules. We need more all-electricZEV and more choices for LEV vehicles in our state. Minnesota needs to be a leader on climate change in the Midwest. Passenger vehicles create the largest share of greenhouse emissions via surface transportation in our state. Emissions from transportation have grown as Minnesotans are driving more miles annually in larger, less efficient vehicles, such as SUVs and pickups.Clean Cars MN will provide more options in electric/electric-hybrid options for consumers.

Tailpipe pollution from vehicles causes ground-level ozoneand contributes to health problems like asthma for thousands of Minnesotans. CleanCarsMN aims to reduce these emissions.

The Clean Cars Minnesota proposal is an opportunity to make real progress towards reducing greenhouse gas emissions from transportation. All types of new passenger vehicles sold in the state would be more efficient and produce less pollution. Also, there will be more options for ultra-low or zero-emission vehicles (like electric and plug-in hybrid models) for people who want to buy them.

Right now, Minnesota is not on track to meet its greenhouse gas reduction goals outlined in the Next Generation Energy Act. This 2007 legislation directed our state to reduce greenhouse gas emissions by 15% by 2015, 30% by 2025, and 80% by 2050 (from 2005 levels). Minnesota did not hit the 2015 target and is not on pace to meet future goals.

Minnesota has made progress towards our Next Generation Energy Act goals in the electricity sector. The energy production sector has reduced emissions by almost 30% through a mix of targeted state policy and independent market actions.

By adopting clean car standards, we will get to choose vehicles that are right for us and our families. While setting higher standards opens the door to cleaner, more efficient car options, it does not force anyone to give up their current vehicle or choose one that doesn't work for their lifestyle.

Presently, there are more than 40 models of electric vehicles sold in the U.S., but less than half are available at Minnesota auto dealers. The Clean Cars proposal will increase access to and demand for electric vehicles. The states that have adopted the Zero-Emission Vehicle standard account for a third of all electric vehicle sales in the U.S., which is considerable given how few states have these standards.

The bottom line: If we are to decrease the output of climate-changing pollutants, we need access to less-polluting car options that fit our individual budgets, preferences, and business needs. As Minnesotans ask what significant actions they can take, the Clean Cars Minnesota proposal will increase consumers' purchasing options.

Clean car standards have saved drivers in other states over \$88 billion and counting. As electric vehicles are cheaper to operate and maintain than gasoline vehicles, increasing access to these vehicles will save Minnesotans thousands of dollars over their car's lifetime.



March 15, 2021

To: The Honorable Judge Jessica Palmer-Denig OAH Docket No. 71-9003-36416

I want to write in support of Clean Cars Minnesota, Minnesota Rules, Chapter 7023; Revisor's ID number 04626

Minnesota needs to keep moving ahead in the fight against climate change and protection of the planet. I have driven a Prius for years, but when it comes time to buy a new car I will look for a fully electric car. I have a lot of concerns about air quality, and more electric cars means better air to breathe for all.

Thank you.

Sincerely, Lisa Habeck, St. Paul, MN

To: Judge Jessica Palmer-Denig Company: Office of Administrative Hearings

Fax #: 16515390310

**Sender Information** 

From: Paul Bastvr

Email address: paulbastyr@gmail.com (from 68.46.2.208)

Phone #: 6128018745

Sent on: Monday, March 15 2021 at 4:31 PM EDT

RECEIVED
By: OAH on 3/15/2021 4:00 PM

Send a fax for free

Honorable Judge Jessica Palmer-Denig, Administrative Law Judge

Office of Administrative Hearings

Attn: Denise Collins

600 N. Robert Street

P.O. Box 64620

St. Paul, MN 55164-0620

Fax: 651-539-0310

RE: Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards—Clean Cars Minnesota,

Minnesota Rules, chapter 7023; Revisor's ID Number 04626

OAH Docket No. 71-9003-36416

Dear Honorable Judge Palmer-Denig,

I'm writing to share my support for Clean Cars MN: the proposed amendments adopting low emission and zero-emission vehicle air pollution standards which would deliver vehicles to Minnesota that produce lower greenhouse gas emissions and air pollutants.

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

Fax: 651-539-0310

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

OAH Docket No. 71-9003-36416

Dear Honorable Judge Palmer-Denig,

I'm writing to share my **support for Clean Cars MN**: the proposed amendments adopting low emission and zero-emission vehicle air pollution standards which would deliver vehicles to Minnesota that produce lower greenhouse gas emissions and air pollutants.

As an EV driver and someone living with asthma, curbing greenhouse gas emissions via Clean Cars MN makes sense for our state and for the health of our communities:

- Passenger vehicles (the cars, pickups, and SUVs we drive daily) create the largest share of carbon emissions in surface transportation in our state. The Clean Cars MN rules 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. These rules are structured to reduce these emissions.

When I went to purchase my electric car, it was difficult to find one in the metro area that met our needs and our budget. The discovery of how many more options there are available in states which have adopted similar Clean Car measures was a major frustration. In the end, we bought and shipped ours from the East Coast. Recognizing that there is little an average consumer can do to help curb climate change, our vehicle purchase and use is one area that will make a big difference to our communities. The demand for more efficient and electric cars is here in Minnesota, but the supply has been stifled. This morning, when we stopped at the dealer for some routine maintenance, there were again no electric vehicles on their lot.

Minnesota needs to be a leader in the midwest on taking meaningful action on climate change, and Clean Cars MN is a big step in that direction.

Sincerely,

Paul Bastyr 4512 Balfanz Rd Edina, MN 55435