



# Resilient Cities & Communities

Visionary People. Vibrant Places. Regenerative Futures.

February 23, 2021

To The Honorable Judge Palmer-Denig,  
Doc. No. 71-9003-36416. Via E-filing

Office of Administrative Hearings 600 North Robert Street P.O. Box 64620 Saint Paul, MN 55164-0620

**RE: Resilient Cities and Communities statement supporting** MPCA's Legal Authority and the need for and reasonableness of Proposed Rules Adopting Vehicle Greenhouse Gas Emissions Standards - Clean Cars Minnesota, Minnesota Rules, Chapter 7023

Dear Judge Palmer-Denig:

**Resilient Cities and Communities** supports a growing network of leaders from 40 Minnesota cities working together to equitably achieve their climate goals on time ([www.rccmn.co](http://www.rccmn.co).)

### **Need and Reasonableness**

**Transportation is now the largest emitter of GHGs in Minnesota.** To reduce our emissions, the MnDOT 2019 Pathways Report In 2019, showed that action will be needed across many areas of transportation including:

- **Improving vehicle efficiency standards** - reducing emissions from gasoline and diesel vehicles,
- **Fuel switching** - transitioning to electricity and biofuels as vehicle energy sources, and
- **Reducing vehicle miles traveled.**

The **Pathways Report** ([www.dot.state.mn.us/sustainability/pathways.html](http://www.dot.state.mn.us/sustainability/pathways.html)) and updated listed adopting the LEV and ZEV standards as a recommended next step in addressing GHG emissions from vehicles. The **Governor's Climate Subcabinet** Transportation Action Team also recommends establishing consumer rebates for electric vehicles ([www.dot.state.mn.us/sustainability/docs/tat-policy-theme-descriptions.pdf](http://www.dot.state.mn.us/sustainability/docs/tat-policy-theme-descriptions.pdf).)

**Air Emissions from Vehicles Impact Communities of Color** – Vehicle emissions, specifically fine particulate pollution – caused 2,000 to 4,000 premature deaths in MN in a recent year. Air emissions are disproportionately impacting communities of color who often live adjacent to high volume roads.

**Many Minnesota Cities have adopted city wide climate goals** and are **depending on the State of MN to adopt rules to accelerate vehicle efficiency improvements and the adoption of electric vehicles** to meet their city GHG reduction goals related to transportation. Over the past four years through our Resilient Cities workshops 40 metro cities (and four cities in greater MN) accessed resources to include climate mitigation, resilience and energy goals in their new 2040 Comprehensive Plans.

During our conversations with 30 metro cities in 1/22/20 (West Metro) and 2/13/20 (East Metro) <http://rccmn.co/county-clusters/> 100 local leader including city staff, city council members and environmental commissioners discussed high impact ordinances they would like to work together to implement to meet their city's energy and resilience goals for energy, buildings, and transportation.

**MN Cities are working to expand E.V. charging infrastructure** to be prepared for expanded E.V. adoption. Many of the cities we are working with are adding electric vehicles to their city fleets, installing public E.V. charging stations and adopting ordinances to require new developments to include E.V. charging spots.

**Minnesotans deserve greater access to electric vehicle choices** – including the coming models of E.V. sedans, cross overs, SUVs and trucks to save money on transportation and vehicle maintenance. E.V.s will soon achieve price parity with the upfront purchase price with traditional vehicles and have much lower life time fuel and maintenance costs.

**Our Minnesota electricity GRID will be strengthened** and improved as electric vehicles become more prevalent. The costs of maintaining and updating our electric grid will be able to be spread out across electricity sales for homes and businesses and transportation.

Resilient Cities and Communities concurs that the **MPCA has the legal authority** in Minnesota law to address vehicle fuel efficiency standards and to address air quality. Section 177 of the Federal Clean Air Act enables states to choose between adopting national standards or CA vehicle fuel efficiency standards. The MPCA has fulfilled the administrative rulemaking steps needed to adopt the California LEV and ZEV standards.

Resilient Cities and Communities concurs with the **need and reasonableness** of the MPCA adopting California's LEV and ZEV clean cars rules for Minnesota the MPCA to

- provide Minnesota residents with wider choice and increased access to purchase E.V.s
- reduce air pollution health impacts in communities of color, and
- help MN Cities to reduce GHG emissions from transportation by increasing E.V. adoption.

Sustainably,

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## Background

Over the past four years through our **Resilient Cities Workshops** and our statewide workshops for City Environmental Commissions 40+ metro cities and cities in greater MN (including Duluth, Faribault, Northfield, Rochester) accessed resources to include climate mitigation, resilience and energy goals in their new 2040 Comprehensive Plans. See a the list of participating cities at [www.rccmn.co/county-clusters/](http://www.rccmn.co/county-clusters/)

### RCC County Clusters – [www.rccmn.co/county-clusters/](http://www.rccmn.co/county-clusters/)

Local Leaders meeting to plan ways their cities can work together to accelerate climate action  
During our conversations with 30 metro cities in early 2020 100 local leaders (including city staff, city council members and environmental commissioners) discussed high impact actions their cities can take together meet their city's energy, climate and resilience goals [www.rccmn.co/high-impact-actions/](http://www.rccmn.co/high-impact-actions/) for [Clean Energy](#) ; [Efficient Buildings](#) ; [Low Carbon Transportation](#) & [Resilience](#)



### West Metro Climate Action Conversation –

**Jan 22, 2020** at the St. Louis Park City Hall  
60 leaders from 14 cities discussed high-impact low-carbon cities their cities can take together - Bloomington, Champlin, Chanhassen, Edina, Eden Prairie, Hopkins, Golden Valley, Minneapolis, Minnetonka, Plymouth, Richfield, St. Anthony Village, St. Louis Park, Wayzata  
[www.rccmn.co/hennepin-communities/](http://www.rccmn.co/hennepin-communities/)



### East Metro Cities Climate Action Conversation –

**Feb 13, 2020** at the Roseville Library – 60 leaders from 16 cities discussed high-impact low-carbon cities their cities can take together - Arden Hills, Falcon Heights, Maplewood, North Oaks, Roseville, Shoreview, St. Paul, St. Anthony Village, White Bear Lake, Vadnais Heights, Columbia Heights, Fridley, Mahtomedi, Stillwater, Eagan, Mendota Heights.  
[www.rccmn.co/ramsey-communities/](http://www.rccmn.co/ramsey-communities/)