

**Subject:** Proposed EV Mandate

**Date:** Saturday, April 8, 2023 at 11:01:37 AM Eastern Daylight Time

**From:** Julie Cummings

**To:** HearingComments, DNREC (MailBox Resources)

My comments are in opposition to DNREC's proposed adoption of California's Advanced Clean Car Regulations.

Kyle Krall states in his RFA Exemption and Impact Statement that "This proposed regulation is not substantially likely to impose additional costs or burdens upon individuals and/or small businesses. The compliance obligation for this regulation is on automobile manufacturers." Automobile manufacturers will surely pass their increased regulatory compliance costs onto the consumer. Don't they always? This, in turn, will put the financial burden of this regulation squarely on the shoulders of the consumer. The California regulations state "Zero-emission vehicle buyers are likely to realize as much as \$7,500 in maintenance and operational savings over the first 10 years of ownership." "Are likely" is not good enough for me. Where's the proof? An EV battery replacement ranges from \$5,000-\$20,000 (not including labor for installation). A typical warranty for an EV battery is only 8 years or 100,000 miles. This is a very major expense for most people and would likely come at a time when they are enjoying the benefits of just paying off their car loan. EV battery disposal is also an environmental nightmare waiting to happen. Cobalt is the only material that is currently being recycled. Lithium, manganese and nickel are still a major problem with no clear path forward yet. Why are we rushing into this when there are still many questions that need to be answered. Let's answer the questions first, then pass the mandate. Wouldn't that be the prudent course of action?

There are many other valid points to be made against this mandate: Charging times are unreasonable for the average driver. There are a lack of charging stations all across the country. Lithium batteries are a known fire hazard and are already attributed to many deaths across the country. The driving range for an EV battery is unreasonable and extremely complicated to properly assess. (Cold weather can deplete a charge by 35%.) Long car trips will be much more difficult to plan and carry out. On a personal note, I have not read a single study that 100% convinces me that sitting so close to an electromagnetic field all day isn't a health risk. Right now, EV's are a rich person's folly. Any EV worth its salt starts at upwards of \$100,000. Nothing in this mandate will change that. Forcing a manufacturer to "hurry up" and change technology to meet a state imposed timeline will only create a rushed product not worth driving at a greatly increased price to the consumer. Manufacturers see the future and are moving forward to accommodate drivers that want the alternative. Change will come, but slow and steady always wins the race; and these regulations are hasty and rushed. California is driving off a cliff at at 90mph. Why does Delaware feel the need to follow?

Thank you for taking the time to consider my viewpoint.

Julie Cummings

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Sent from my iPad