

Subject: Comment Regarding Potential Adoption of Clean Car Regulations

Date: Wednesday, April 26, 2023 at 3:30:59 PM Eastern Daylight Time

From: Eric Selden

To: HearingComments, DNREC (MailBox Resources)

Hello,

I write to express my strong opposition to the adoption of the Advanced Clean Car II (ACC II) regulations, and ask that you read this in its entirety. Citizens of Delaware should be free to choose whether they wish to purchase a gas-powered vehicle, electric vehicle, or some sort of hybrid model without imposition and coercion. That choice will be based on a number of factors, including, among others, cost, driving patterns, and environmental concerns. The number of electric and hybrid vehicles has increased in Delaware over the past several years, demonstrating that many Delawareans are choosing to make a change away from gas-powered vehicles. As both technology and infrastructure improve, it is reasonable to assume that trend will continue. But authoritarian imposition of ACC II regulations improperly removes that choice from each citizen and will have a dramatic negative impact on Delaware's economy writ large and individual circumstances.

I understand the objective of the ACC II regulations to be a reduction in the "carbon footprint" associated with automobiles driven in Delaware. There is nothing wrong with that goal. But as economist Thomas Sowell has noted on many occasions that "[t]here are no solutions, there are only trade-offs", and that is certainly the case here. Thus, the question is not whether overall carbon emissions may decrease as a result of implementation of the ACC II regulations, the question is how much will they decrease, and at what cost? In a desire to demonstrate that they are *doing something*, I do not believe that officials (elected and unelected alike) are properly engaging in this practical analysis.

The reality is that, putting aside differences in opinion regarding human impact on climate change, the technology and infrastructure needed to move away from fossil fuels at the speed being pushed by those making laws and regulations simply is not there. The result of an arbitrary push away from fossil fuels will be a devastating negative impact on the economic well being of the citizenry (putting aside other negative lifestyle impacts). Further, I believe that negative economic impact will be dramatically disproportionate to the net benefit of the policies. The fact is that based on the current make-up of energy production and the carbon emissions necessary merely to produce lithium ion batteries, electric vehicles must be driven for years (in some cases many years) just to "break even" in their carbon footprint. After that, they will have a reduced footprint, but it will still be a large percentage of the carbon emissions generated from gas-powered vehicles. One may argue that the break-even point is much shorter if electricity is generated by renewable sources. But good policies must be based on reality, and the reality is that the technology to support all renewable energy production does not currently exist. Further, pushing Delawareans to purchase electric vehicles beginning in 2027 will put enormous strain on our electrical grid and drive up energy costs.

As a practical matter, these regulations will also drive people and business out of Delaware. People will simply buy their cars elsewhere or, in many cases, simply leave. There is a reason California's population has been decreasing over the past several years for the first time since at least 1900. Why would Delaware adopt the trends that are causing that decline?

It would be beyond irresponsible to implement the ACC II regulations. More importantly, it would be an affront to the concept of individual freedom and liberty. People make informed decisions regarding their automobile purchase. We understand the trade-offs. We understand there is a cost to both electric and gas-powered vehicles. Do not make the mistake of thinking you know better. Let the market and technology continue their progress, which will naturally create more opportunities for carbon emission reduction in the future. The net benefit of these regulations is not worth the negative impact they will cause.

Sincerely,
Eric Selden