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**From:** DoNotReply@delaware.gov

**To:** HearingComments, DNREC (MailBox Resources), johnfannan@hotmail.com

Comments on 2022-R-A-0011: Low Emission Vehicle Program

Name: John Fannan

Phone: 3025290405

Email Address: johnfannan@hotmail.com

Organization:

Comments:

The truth is, because of the nature of uncertainties in global industrial ecosystems, no one really knows how much widespread adoption of EVs could reduce emissions, or whether they might even increase them. While grid realities will indeed matter more than most realize, the relevant and surprising emissions wildcard comes from the gargantuan, energy-hungry processes needed to make EV batteries. Some automakers—notably Volkswagen and Volvo—have published their own studies that take into account both upstream emissions and grid realities. Those analyses found that an EV powered on Europe’s grid creates more CO2 emissions than a conventional car until at least 50,000 miles of gasoline-free driving. After 120,000 miles, the studies estimated that total cumulative emissions reductions finally reach about 15 percent and 25 percent, respectively. Hardly “zero.” Those savings shrink for cars using batteries significantly bigger than small one in the Volkswagen and medium-sized one in the Volvo. And the calculated CO2 reductions collapse, and even evaporate entirely, if one factors in the higher ranges of known values for upstream emissions in mining and processing, rather than the low, average values chosen in those studies. Meantime, hundreds of billions of dollars designated for wildly premature all-EV mandates will likely become stranded capital because the quantities of minerals needed won’t be available soon enough. Along the way, those stranded billions will do little or nothing to cut CO2 emissions. In the end, the rush to EVs could even increase global vehicle-related emissions. <https://www.city-journal.org/article/electric-vehicles-and-carbon-emissions> Where is the DNREC cost benefit analysis? The low emission vehicle program will be a disaster.