

**Subject:** Public Hearing Comments

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

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Comments:

I am opposed to the electric vehicle(EV) mandate for the following reasons: (1) The mandate is based upon misleading information suggesting that gas-powered passenger vehicle contribute 29% of greenhouse gases in the U.S. The truth is that gas-powered passenger vehicles only contribute about 16% of all greenhouse gases. The 29% figure is the amount produced by all transportation, to include planes, trains, and buses; (2) the data from the EPA suggesting that electric vehicles are more efficient and have a smaller carbon footprint than gasoline powered vehicles is also misleading because it is based upon the efficiency of driving an electric vehicle with a full tank of gas versus a vehicle with a fully charged battery and does not take into account the emissions stemming from the mining, manufacturing, and shipping of the vehicles. Volkswagen published an honest study that points out that for the first 60,000 miles of driving an electric vehicle it will have emitted more carbon dioxide than a conventional vehicle. In fact, according to the International Energy Agency, an electric vehicle requires six times the mineral inputs of a comparable internal combustion engine; (3) Electric vehicles are not as environmentally friendly as they seem - the environmental impact depends on the type of fuel used to generate the electricity and currently 30% of electricity production in U.S. uses coal, which is far dirtier than gasoline; (4) the horrific human rights violations and environmental devastation involved in mining for lithium, cobalt, nickel, and other rare minerals used in battery production are unacceptable; (5) the dangers inherent in the use of lithium and/or cobalt batteries and in the disposal of them at the end of their lives must be considered; (6) the energy grid in the U.S. is vulnerable and inadequate to sustain the additional charging stations that will be required; (6) there is a woeful lack of technicians trained to work on EVs (a shortfall of 38,000 technicians by 2030 according to Motor Trader.com); and (7) the safety of the EVs is also a major issue in that they weigh much more than gas-powered vehicles, have dangerously powerful toxic batteries that can ignite and cause a conflagration that cannot be contained. In sum, the current EV technology is not a win for the environment and may actually do more harm than good. There is woefully inadequate planning and preparation for EV rollout. Thus, to say an EV mandate is premature is an understatement. For all the foregoing reasons I am against the mandate.