

Subject: Public Hearing Comments

Date: Wednesday, May 24, 2023 at 4:00:00 PM Eastern Daylight Time

From: DoNotReply@delaware.gov

To: HearingComments, DNREC (MailBox Resources)

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

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Comments:

I first endorse the following published comments by State Sen. Rich. Collins, after which I shall append additional points. Sen. Collins: While electric vehicles (EVs) do not have tailpipes, they use electricity from plants producing emissions and hazardous waste. The vast majority of EVs are charged from the power grid. According to the U.S. Energy Information Administration, more than 60% of the nation's electricity is produced using fossil fuels. Another 18% is generated with nuclear energy. While being zero-emission, nuclear reactors produce highly radioactive waste for which the nation has no long-term storage solutions. Gov. John Carney, who directed DNREC to start the process of promulgating the EV mandate regulations, concedes that most of the state's air pollution is not produced by Delawareans. Writing in a June 2018 opinion column the governor stated that "90% of Delaware's air pollution comes from other states." The column lamented that out-of-state power plants, south and west of Delaware, were not using pollution control equipment to reduce their emissions. DNREC maintains it must force the adoption of EVs because of the impact of Delaware's pollution on the downwind Philadelphia Metro Area. But according to Philadelphia's Air Quality Report 2021, "trends show many air pollutants in Philadelphia to be decreasing. In 2021, Philadelphia attained the NAAQS for all pollutants, except for ozone." In fact, a review of the Philadelphia Annual AQI shows a steady, dramatic improvement over the last four decades, without EVs making any significant contribution. In 1981, 159 "unhealthy" days (the fourth worst category on a scale of six) were recorded. That number dropped to 53 days in 2001 and to just 6 days in 2019 (pre-pandemic). The number of "good" days (the best category) recorded jumped from 18 in 1981, to 98 in 2001, to 244 in 2019. According to federal data, there were 1.31 billion light-duty vehicles (LDVs) in the world in 2020. Delaware's 967,400 cars, trucks, and SUVs (2021) constitute less than eight one-hundredths of one percent of all light-duty vehicles on the planet. Even if Delaware were to entirely ban the operation of all Delaware cars, trucks, and SUVs tomorrow, there would be no appreciable difference in worldwide CO2 emissions or any other pollutant linked to global warming or climate change. While we all have an obligation to be good stewards of the environment, the Carney administration's policy of forcing the adoption of EVs will carry huge costs for taxpayers and impose hardships on Delaware families for what amounts to global virtue-signaling. While Delawareans are being asked to surrender their freedom of choice and make huge personal and taxpayer-funded financial investments to embrace EVs and reduce global carbon emissions, China is doubling down on the use of carbon-rich coal. From the YaleEnvironment360 (a publication of the Yale School of the Environment) "Despite Pledges to Cut Emissions, China Goes on a Coal Spree": Coal remains at the heart of China's flourishing economy. In 2019, 58 percent of the country's total energy consumption came from coal, which helps explain why China accounts for 28 percent of all global CO2 emissions. And China continues to build coal-fired power plants at a rate that outpaces the rest of the world combined." As is the case in Delaware, less than 1% of the nation's vehicles are EVs. As of the end of 2021, there were 967,400 vehicles registered in Delaware, of which 3,010 were EVs (0.31%). While proponents of the EV mandate claim that used fuel-powered vehicles will still be available for sale and use, there is reason to question this. California's Advanced Clean Car II regulations are a major part of the broader "2022 Scoping Plan for Achieving Carbon Neutrality" that was released last November. The plan envisions reducing demand for liquid petroleum by 94% by 2045 (relative to 2022). The only way to achieve these goals is to take aggressive steps to eliminate the use of fuel-powered vehicles. The supply of affordable used fuel-powered vehicles is likely to be constricted because of higher emissions standards placed on these vehicles under the Advanced Clean Car II regulations. Additionally, the EV sales mandates will drive up the cost of pre-owned internal combustion engine vehicles as their availability dwindles. According to an analysis published by MIT Science Policy Review, the lack of

home charging options for EV owners living in urban areas, apartments, and condos presents a troubling inequity. The questions of how home charging can function in a city environment with on-street parking, and what level of government involvement and spending will be required to deal with this issue, are unquantified and unresolved. Now, me (Spong): Proponents of the EV mandate assert that its instantiation would increase consumer choice because right now, EV manufacturers aren't selling many in Delaware because of its lack of such mandate. I assert that that statement is transparently hypocritical because while possibly increasing consumer choice for EVs, it obviously would reduce, then eliminate, the consumer choice for fuel-powered vehicles. Further, there has just been a court decision that apparently gets around the ban on Tesla selling EVs directly in Delaware because of their lack of dealer franchising, albeit said decision relies on something akin to "words mean what I say they mean." Anyway, manufacturers other than Tesla, those that also sell fuel-powered vehicles, have franchised dealers in Delaware and would probably offer more EVs to the extent that the unmandated, free-market demand manifests itself, and it must be substantial, because I see Teslas on the roads nearly every day, and am unable to recognize some of the other makes of EVs. There are many credentialed scientists and other experts, including the former Delaware state climatologist, Dr. Leathers, who assert that climate change/global warming is, at worst, not as severe as many of the computer models have predicted. The statement that 97 (or thereabouts) % of scientists agree with the dire prediction of global warming and the urgency of "damn the torpedoes, full speed ahead" countermeasures has been challenged by a documented assertion that only those who explicitly said "no" were counted as against, and all those who did not respond, along with all who gave an ambivalent response, were counted as "yes" in arriving at that figure, and I am unaware of any refutation of this latter assertion. I am of the opinion that the sum total of benefits that may be realized by an accelerated phase-in of zero-emission vehicles is outweighed by the sum total of detriments that would also be realized by the premature phase-out of fuel-powered vehicles for range, lower purchase cost, trailer-pulling power and the existing base of maintainers and repairers, and in the face of a grossly insufficient installed zero-emission electric-power-generation base and a grossly insufficient electrical-power grid.