

Subject: Public Hearing Comments

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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 am writing to you on the subject of electric vehicles in general and to implore you to stop DNREC's proposed regulatory path that will mandate a steadily increasing percentage of new vehicles on dealers' lots to be "zero-emission" vehicles up to 100% by 2035. The regulatory program, adopted from California, that calls for the forced increases in electric vehicles into the market, despite the very low consumer desire and demand, is based on pipe-dream premises that are entirely unsustainable, scientifically false and economically devastating. I urge you to consider the following points: 1. Unconstitutional deprivation of freedoms: The issue of unconstitutionally forcing citizens to purchase certain products against their will appears to be absolutely ignored. The same goes for forcing manufacturers to make a certain percentage of vehicles a certain way and for forcing dealers to stock a certain percentage of a particular type of vehicle, despite the consumer demand and rates of preference being far lower than those percentages. As alternative vehicle technology develops, the alternative choices must only be available by way of a free market, meaning that they present competitive choices and alternatives for consumers' choice. Government has no Constitutional authority to distort those market choices or to manipulate the market in any particular direction. Since you have sworn an oath to uphold the Constitution, it would seem obvious that you would understand this principle. However, the proposed regulations indicate a complete disregard for the Constitution and an arrogant abuse of government authority that is truly stunning and disgusting. Your disdain for, and willful dismissal of, Delawareans' Constitutional freedoms and your willingness to grossly exceed the scope of your agency's regulatory authority are appalling and unbecoming of your position. 2. No "consensus" regarding flawed scientific premises: Despite the term "consensus" that the media and government officials like to use, there is no scientific consensus that vehicle emissions are altering global temperatures or the amount of CO2 in our atmosphere. Also, although there are seasonal and decade-long variations and cycles in various climate metrics, there are no long-term trends indicating any significant increase in global temperatures or CO2 levels that are even remotely detrimental. Regardless, the temperature of our planet is controlled most dominantly by the sun and cycles of solar flares and sunspots. Global temperatures and CO2 levels have been fluctuating since the beginning of the planet and are, at most, insignificantly influenced by human activity. Therefore, the shift to "zero-emission" vehicles will not make any difference in the climate. 3. No stated goals or tangible benefits for the enormous costs: Not one government or environmental official or scientist has ever put forth any projections of any "end points" that we must reach in order to stop or reverse the alleged climate changes being claimed. David Turk, the Deputy Secretary of the US Department of Energy was plainly unable to respond to questions in a US Senate hearing about how \$50 trillion in spending over the next few decades will achieve carbon neutrality or any change in global temperatures. What are the goals for the climate, as if we had any influence on it? The entire premise is an absolute farce and a scam! Frankly, no amount of spending of taxpayer money will achieve such ends, or any meaningful change, and a condition of "net zero" is unattainable. (True scientists who are not influenced by politics or money understand this.) The only result will be a nation even more hopelessly weakened by unimaginable debt, which will be a crushing burden on future generations, except that a few wealthy interests will benefit handsomely. Also, all life forms on earth are carbon-based. Plus, CO2 comprises a surprisingly tiny percentage of the earth's atmosphere. CO2 is also food for all plants in photosynthesis. Slight increases in CO2 are not only not harmful but in some ways could be potentially beneficial in growing enough crops to feed a growing global population. Government and media attempts to make gullible people believe that there is a crisis relating to carbon and CO2 are insidious propaganda efforts and nothing more. 4. Environmental impacts and depletion of finite resources: Are you at all aware of the environmental

destruction and massive resource use required in the manufacture of batteries for electric vehicles? Are you also aware that there are not enough lithium and cobalt resources worldwide to support widespread electric vehicle implementation? Here is a brief summary – ONE electric car battery requires:

- 500 tons of ore to refine 25 lbs of lithium
- 900-1000 gallons of fuel to move the ore
- One electric battery for a Tesla requires 25 lbs of lithium, 60 lbs of nickel, 44 lbs of manganese, 30 lbs of cobalt, 200 lbs of copper, 400 lbs of aluminum, steel and plastic. That's a battery weighing at least 759 pounds.
- The production of one battery takes tremendous amounts of energy supplied by coal, nuclear or gas fired power plants. This is the farthest thing from “green” energy imaginable.
- Lithium is refined by using sulfuric acid; the mine at Thacker Pass requires 75 semi truck loads of acid per day. The high cost and energy requirement to “recycle” an electric car battery makes that process completely inefficient and essentially impossible economically.
- The disposal of large numbers of used batteries presents a tremendous environmental hazard. Will they be buried in battery landfills? Surely that would be an environmental nightmare. Will they be dumped in a place like Yucca Mountain, just like spent nuclear fuel? They would have to be transported there by petroleum-consuming trains or trucks, thus further negating any marginal environmental benefit they may have offered.

5. Wide-ranging economic impacts: Clearly, the economic impacts to average citizens, small businesses and especially lower-income citizens have not been considered in the least. The high cost of electric vehicles is much more than a large percentage of citizens can afford. Also, the high cost of replacement batteries (\$13,000-\$20,000+) effectively makes the vehicle worthless when the original battery reaches the end of its useful life. How are working people that currently can only afford an older used vehicle for a few thousand dollars expected to pay for an electric vehicle or a battery for a used electric vehicle? Alternatively, if the number of gas-powered vehicles in the fleet shrinks, the demand for, and availability of, fuel, parts and service will also decrease. First, those industries will be progressively damaged into extinction...with what to replace the massive economic ripple effect of the jobs and businesses lost? Second, the cost of the fuel, parts and service will increase, further hurting the average consumer. Electric vehicles are also completely impractical or even useless for many consumers and businesses. Traveling in these vehicles is inefficient as drivers have to stop every few hundred miles – or often much less – and wait long periods of time to recharge the vehicles. Also, the reduced capabilities of electric vehicles as compared to conventional vehicles will greatly limit towing trailers for work or recreation and will also limit many other recreational pursuits. Finally, electric vehicles and their batteries are less efficient in more extreme cold and hot temperatures, thus increasing electricity costs for owners in those climates and further limiting their economic opportunities.

6. Energy requirements to produce more electricity: One of the biggest questions about the move to electric vehicles is how will adequate amounts of electricity be produced and delivered in the grid? If you say that the current production system will be adequately supplemented by wind and solar power, that is blatantly false. Solar and wind equipment have many of the same pitfalls as electric battery production and lack of recyclability, not to mention the issues of intermittent effectiveness dictated by weather. The cost of increasing the power supply and necessary upgrades to the power grid will be passed along to consumers, hitting them economically again. The fact is that more fossil fuels will be needed to produce the ever-increasing amounts of electricity required, which ultimately contradicts the “zero-emissions” goal. The ultimate solution is nuclear power, but the multi-billion dollar cost of nuclear plants and their 15-year construction periods make that a much longer-term prospect.

7. Safety issues with electric vehicles: Are you aware of the hazards posed by electric vehicles that are above and beyond those of conventional vehicles? If a conventional vehicle catches fire, it takes an average of 500 gallons of water and a rather short time to extinguish the fire. If an electric vehicle catches fire, which is typically caused by the batteries, it takes an average of 10,000 gallons of water and a much longer time to extinguish the fire. Also, the fire is much more dangerous to approach by firefighters, as it can shoot out in all directions, and it burns much hotter than a fire in a conventional vehicle. In rescue operations in the case of a crash with a trapped occupant in an electric vehicle, often firefighters have to use the “jaws of life” equipment to extricate the trapped occupant. Part of the mechanism of the rescue machinery has to press on the floor to exert the force necessary to push the dashboard away from the occupant. The batteries are under the floor of the car, and exerting pressure on them causes a variety of hazards, including the risk of fire. Finally, the risk of fire posed by batteries in electric vehicles thus increases the risk of fire in owners’ garages if there is a malfunction with the battery or the charging system. Do you really believe that such increased risks are acceptable? An additional point must also be made, which is that electric vehicles weigh at least 20% more than equivalent conventional vehicles, thus putting more wear and tear on transportation infrastructure. This will increase road maintenance costs over time, costs which, again, will have to be passed on to consumers who are already being crushed by increasing costs in many other ways.

8. Impracticality of charging stations: It should be obvious that many people living in urban areas that do not have their own garages or driveways would not be able to have their own vehicle charging stations. Would there be community charging stations? Who pays for those? Also,

conventional vehicles take a rather short time to refuel at gas stations, and the process of handling volumes of vehicles at gas stations is relatively efficient. Meanwhile, electric vehicles take much longer for recharging. How will recharging stations – not to mention the power grid – handle an ever-increasing influx of vehicles needing to recharge? I know that the State of Delaware has received money from the federal government to pay for recharging stations to be built on the state's major highways. That means that taxpayers across the country are ultimately paying for Delaware's recharging station, and the same situation is most likely the case in other states. Does that mean that the burden to build more and more recharging stations across the country, necessitated by government-imposed demand, will continue to fall on the American taxpayer? The country is already \$31 trillion in debt, and the American taxpayers have seen their future prospects for generational prosperity greatly set back due to ever-increasing government spending and the resulting inflation. Yet government continues to impose these costly boondoggles on taxpayers. It's unforgivable.

9. Child labor abuses: Surely you are aware of the fact that child labor is being used in Africa and elsewhere in mining and other related efforts to obtain the raw materials for electric vehicle batteries. Typically the countries where the mining occurs have no child labor protections, and the owners of the mining companies are much more concerned about profits and cornering the market for the raw materials to be concerned with the labor abuses, not to mention the chemical toxicity and other dangers involved in such work.

10. National security and geopolitical adversaries: Surely you are also aware that the majority of many of the raw materials is being extracted by Chinese companies around the world, if not in China itself. Therefore, China, our most prominent geopolitical adversary, is gaining the advantage of being in complete control of the worldwide market for electric vehicle batteries and perhaps even the software that controls the vehicles as well. Why would any American government official in their right mind propose or enact policies that exacerbate this situation? That's not a naïve question, and it is common knowledge that many American officials are benefiting from financial arrangements for enabling this process. To allow this radical regulatory plan to move forward is entirely unconscionable and reflects a total and disdainful lack of economic concern for Delawareans, while demonstrating an allegiance to the most radical left-wing influences, which have been ruining this state in so many ways. I am urging you to suspend all implementation of this regulation, effective immediately.