Subject: Regulation 7 DE Admin. Code 1140 - Docket #2022-R-A-0011 **Date:** Friday, May 26, 2023 at 2:57:51 PM Eastern Daylight Time

From: Paul Abel

To: HearingComments, DNREC (MailBox Resources)

Mr. Kyle Krall and DNREC Regulators,

I wanted to comment on the proposed regulation where Delaware intends to mirror the California ACCII Low Emission Vehicle standards.

I vehemently oppose this proposed regulation for many reasons, with the more significant reasons mentioned below. I believe that having partisan government officials push illogical regulations on the American public is radically unfair and unnecessarily punishes the American public. In addition, the technical, scientific basis for this policy is seriously flawed and is rarely publicized.

Below are some of the realities about Electric Vehicles (EV's):

- They are <u>not</u> Zero Emissions Vehicles as there is a significant amount of emissions from Power Plants across Delaware and the US (about 80% of which are fueled by clean burning fossil fuels and coal) that are directly associated with the power required to charge an EV's batteries. Just because there are no tailpipes on an EV, **does not** mean there are no related emissions.
- The electrical infrastructure of our country is already severely stretched. In its current state, it is clearly incapable of supporting a large influx of EV's and their associated electrical drain on an already overloaded system. The American public already has to endure "brownouts" throughout the country, particularly in the Summer with high electrical consumption with Air Conditioning loads. This would get dramatically worse if a large number of EV's were charging up and resulted in people enduring the sweltering heat and/or being left in the dark when their power goes out.
- EV's are in fact an **environmental nightmare** for several reasons:
 - Mining of lithium and other metals to produce batteries is destroying the countryside throughout the globe
 - Battery packs in EV's have a short life and will create a hazardous waste disposal nightmare when they reach the end of their useful life.
- EV's further increase our dependence on China as they have become the global leaders in battery production
- EV's are much more expensive than gas-powered vehicles and will realistically not be affordable for the
 vast majority of the American public. The independence and opportunities for many Americans will be
 taken away from them as they will lose the ability to have affordable transportation and mobility

Finally, gas-powered vehicles are affordable and consume clean-burning fuels, that are cleaner now than they ever have been. The refining industry has made remarkable strides over the last 30 years to provide clean, sulfur-free fuels. The remaining emissions, which is mostly carbon dioxide, water and nitrogen are not detrimental as many politically-driven people would have you believe. The amount of naturally occurring CO2 far exceeds the amount produced by the combustion of fossil fuels and the earth has flourished for centuries

with this vital component in the atmosphere.

Respectfully,

Paul Abel

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