

**MY COMMENTS Clean Air Act Amendment**

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To: Krall, Kyle (DNREC) <Kyle.Krall@delaware.gov>

*"The purpose of this action is to amend 7 DE Admin. Code 1140, to update the adoption by reference of California's Advance Clean Car II (ACC II) low emission vehicle and greenhouse gas standards and add the requirements for zero emitting vehicles for model year 2026 and beyond. The ACC II regulations will reduce criteria and greenhouse gas emissions from new light- and medium-duty vehicles beyond the 2025 model year as well as add the new requirements for zero emission vehicles."*

Dear Mr. Krall,

THESE ARE MY COMMENTS regarding the above mentioned DE amendment. There are many questions that need to be addressed BEFORE we get embroiled in technologies that we do not yet know how to manage adequately.

I am very concerned about the new clean air act proposed amendment which is moving toward the elimination of fossil fuels related to automobiles. While initially, the idea of promoting the reduction of air pollution through elimination of fossil fuels seems good, there are also many unintended negative consequences mentioned in my comments below.

Therefore, I wish to express that I am advocating for a **vote against this amendment** at this time and definitely DO NOT wish for Delaware to adopt California's model or any model at all until the issues I mention below are adequately addressed in a public forum.

#1 COST -A Electric cars will impact the cost of cars in a negative way particularly the extreme costs of replacement batteries.

As a senior citizen on a fixed income, this will put my husband and me in a position of not being able to afford purchasing and maintaining a car.

#2 COST-B : The pressure to purchase electric cars will also negatively affect the cost of gas powered used cars at first and then eventually make gas powered used cars unavailable to used car buyers like myself.

#3 TOO MUCH PRESSURE ON ELECTRIC GRID: The increased use of electric cars will put too much pressure on available electric resources. We are already being threatened with brown outs because of increased pressure on the electric grid during extremes of cold or hot weather.

" In a release, PJM stated that on "Dec.23 a holiday storm generation outages, frigid temperatures and increased demand, led to a call for conservation efforts across the PJM region was the first since the Polar Vortex of 2014. PJM implemented several emergency procedures, including Max Generation Alerts and pre-emergency and load emergency management in the days leading up to Christmas." <https://delawarebusinessnow.com/2022/12/grid-operator-pjm-requests-delaware-residents-to- conserve-power-as-region-sees-period-of-bitterly-cold-weather/>

#4 Electricity generation is NOT clean energy under any circumstances. Using electricity to power automobiles is like the issue of the disproportionate high cost of feeding cows to provide beef.

#5 TOXIC waste disposal is an important issue with regard to disposal of batteries. Plus the costs of recycling the rare earth minerals from the batteries.

#6 OVERDEPENDENCE ON FOREIGN GOVERNMENTS FOR BASIC NEEDS Rare earth mineral mining is not only TOXIC but it is carried out often by foreign governments which may not be friendly to the U.S.

#7 TOXICITY Mining of rare earth minerals/ elements uses highly TOXIC processes. I have not done the studies on this but the toxicity issue may be more severe than the fossil fuel issues including toxic emissions.

#8 COBALT MINING: Cobalt mining has been involved with all kinds of horrible issues including human trafficking and slavery. Here is just one site that monitors such things:

<https://humantraffickingsearch.org/cobalt-mining/>

#9 RECYCLING?: Are our recycling technologies sufficient for recycling batteries in large quantities? <https://humantraffickingsearch.org/resource/can-we-get-clean-energy-without-dirty-mines/>  
VOTE NO!!!

Thank you for your attention  
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