Steven Silvey

Sirs,
I have attached some comments, so why are not hybrid vehicles not considered, and further the fact that vehicle production is not considered.

Comment on the proposed rules, Chapter 173-423 WAC – Clean Vehicles Program, and Chapter 173-400 WAC, General Regulations for Air Pollution Sources

RE: **Clean Vehicles Program and General Regulations for Air Pollution Sources**

25 September 2022

Sirs,

Under the law and the action to the various rules you are proposing, for implementation it all appears to confuse me, and makes no sense from a data standpoint.

Given that none of my representative would talk to me while this was before review and proceeding, and that the state of Califo0rnia does not reply to an out of state resident please answer:

Why are California politicians better to follow? Even our own reps cannot or will not reply. The following is the statement in your web site:

> **Under a 2020 law, Washington is required to reduce its overall greenhouse gas emissions 45% by 2030, 70% by 2040, and 95% by 2050. Since almost 45% of Washington's annual greenhouse gas emissions come from transportation, cleaner cars and trucks are essential to meeting these limits.**

Questions:

1- % of what? Meaning what is the baseline of this statement?
2- When establishing this baseline, what are all the other factors: meaning population of area studied? Wind factors that period of time, forest fires, time of year, and all data related to the collection of said data and by whom? Were they qualified?
3- Does any city or the state of Washington live under a bubble? Or controlled environment that we the people have absolute control of?
4- How does the state of WA regulate air quality from out of state? Meaning the wind does blow.
5- If in fact the actions to achieve these goals increase the green house gases in other parts of world is that taken into consideration?
6- Is 5 even in the calculation to establish where we are?
7- Is the statement true? Given data from EPA that shows one gas NOX is more from agriculture than transport.

Now one may seem to disregard the above statements and questions, but like so many things within large organization there is a bit of sloppiness, and generalizations made but at the same time they affect real people and lives in the real world.

Since in fact the premise of this law as passed is to eliminate green house gas by our transport methods, and since there is no bubble over any part of the state, then what we do and require in our state is now affecting not only our environment, but also the worlds, and vice versa.

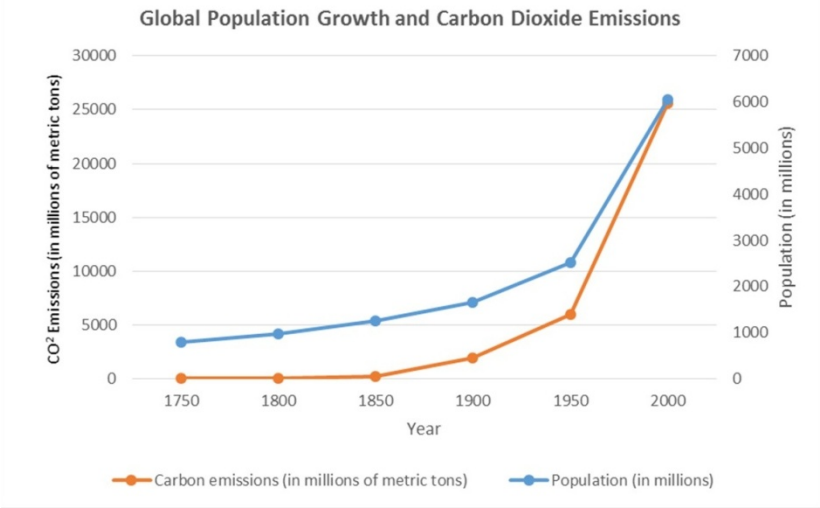
So please answer the following:

1- What is the life cycle analysis (LCA) of going to these electric vehicles?
    a. At what point in the life of the electric vehicle does it become green?

        i. Please understand it has to be built, what is that carbon content, environment content, green house gas content, and damage to roadways and rubber released to the environment content
    b. How many miles have to be driven to become green
        i. Meaning the building, mining and power consumption of vehicle used all factors.

2- Where is the power coming from? Remember hydro in the state of Washington is not to be thought of as green.
3- Since new mines must be dug, equipment built to mine and materials to be processed, and then transported, what is that LCA?
    a. Does this mean that WA State supports the mining in other states, such as Northern Nevada, or say in the Columbia Gorge due to demand for lithium or cobalt or other special mineral needed for electric cars?
    b. If in fact an area of mining or manufacturing is contributing to green house gas is that calculated into WA State calculation?
        i. Or is it the fact that green house gas produce to reduce WA in an out of state area it is okay?
4- Since the weight of a electric car is greater than that of an ICE vehicle, the wear and tear of the roads shall be greater, are they to be thus taxed at a higher rate, or weight rate?
5- Also since they weigh more and shall decompose rubber particles at a higher rate, has the drainage structure within our road system been upgrade or planned to be upgraded?
6- What is the plan for taking care of used up cars and batteries?
    a. Is there a recycling program in place?
    b. Is it within state?
    c. Is it allowed due to all the hazardous waste involved?
7- If California starts changing their rules, then ours are too?
    a. How is this a point of representative government?
    b. Does department of ecology have access and impute to California rules and regulations?
    c. Do the people of Washington have impute?

Population:



Taken from " How does Population Growth impact Climate Change?
BY KATIE LUOMA | *November 1, 2016*"

The above graph does a comparison of population and our Carbon Dioxide emissions, a green house gas.

So when deciding to cut our emissions, has population been taken into account? Per graph above it seems fairly evident that human population growth is a very large contributing factor and that when one is considering cutting something by 40% that all factors should come into play otherwise it is a lie, and based on false data. Are the calculations so complex that they cannot be explained? This is the case in Vancouver, WA on the auditor's web site, maybe if one cannot explain in a simple manner than the calculations are shall we say not correct.

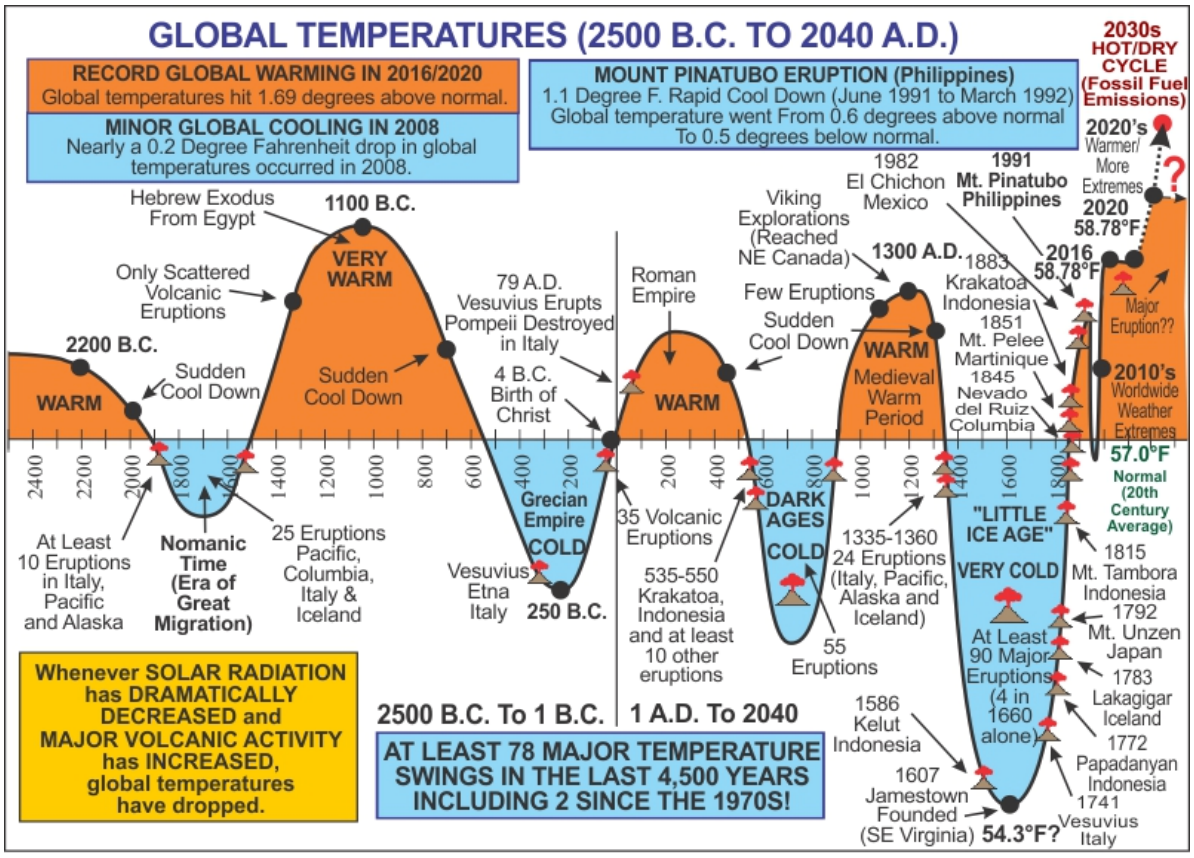
The population of Wa State is approximately 7.5 million people as of 2020, and that of the USA is 329 million, and that of the world is, 7.753 billion people. So the effect that is being instituted to our overall economy and environment is that since the state of Washington has 0.1% of the world's population that our effect of moving forward is going to change the world, (since we do not live in a bubble)

So my questions are:

1- Where are the numbers and the LCA effect of this action?
2- Is the state of Washington going to put into place border guards to limit access to the state, or has there been put into place a sliding scale based on population growth.
3- If in fact the cost in $$$ is prohibitive, to change to a non ICE vehicle does that mean ICE vehicles are kept longer and now pollute more?

4- Is there a factor in the calculations for the possible eruption of one or more of the volcanoes within our state? Given the particle matter and gases, and past history in which world climate was affected has this been taken into consideration in the 40 to 50% drop.
    a. Secondary are forest fires considered, due to continued mismanagement of said forest there undoubtedly shall be more major fires,

Since in fact the elimination of green house gas is so that we can maintain earth temperature...



The above is taken from http://www.longrangeweather.com/global_temperatures.htm,

Since the earth is and has cyclic periods, in geological sense has this been taken into consideration, and discussion? So recently much solar activity has been reported, is this taken into consideration. The other aspect though less known is earth tilt, what effect does this have on the issues.

So where is this power coming from?

Per a recent paper by Stanford: https://news.stanford.edu/2022/09/22/charging-cars-home-night-not-way-go/

> Once 50% of cars on the road are powered by electricity in the Western U.S. – of which about half the population lives in California – more than 5.4 gigawatts of energy storage would be needed if charging habits follow their current course. That's the capacity equivalent of 5 large nuclear power reactors. A big shift to charging at work instead of home would reduce the storage needed for EVs to 4.2 gigawatts.

So when considering the above statement do we have that study for WA as they consider WA part of the study. Further in another statement this is stated:

> "We considered the entire Western U.S. region, because California depends heavily on electricity imports from the other Western states. EV charging plus all other electricity uses have consequences for the whole Western region given the interconnected nature of our electric grid," said **Siobhan Powell**, lead author of the March study and the new one.

Thus since following CA in all things where do we stand?

What is our power source?

What is our costing?

Is this coming to a point like in Colorado recently that the utility locked thermostat settings inside individuals home to save energy, (https://nbcmontana.com/news/nation-world/company-locks-customers-from-changing-smart-thermostats-due-to-energy-emergencyso) is WA going to control the grid to limit whom charges and when?

> **"And it's not just California and Western states. All states may need to rethink electricity pricing structures as their EV charging needs increase and their grid changes," added Powell, who recently took a postdoctoral research position at ETH Zurich**

So on individual cost not only do cars cost more, but pricing for electricity goes up, and now the grid needs to be refurbished?

Does it not go to make HYBRID cars, that charge while driving, and get higher fuel economy?

The study has been done correct? What were the results? What were the reductions? The infrastructure exist to use these vehicles today.

Going all electric is the infrastructure capable? What is it going to cost to upgrade, what is the effect of that upgrade? Costs, LCA, effect on supply upgraded panels, circuits, copper wire thickness increases, wire manufacturing costs, transport of said wire now since weighs more.....

As the process moves forward, I would hope that consideration to the above points is taken into account. A final point may be that the state lead, what this means is that those vehicles in state use be changed, that those working for state institutions be restricted with their choice, and have to change. Show by example, and publish the facts. As the joke goes, the fire department, or police could not respond due to the fact the car or truck needed to be charged.

Thank you,

Steven Silvey
Vancouver, WA