Anonymous Anonymous

I believe my comment would exceed character limit, so I have attached a document.

Thank you!

Dear Department of Ecology October 17, 2022

Thank you for having a period of input regarding your proposed recommendations. I am writing in response to Chapter 173-423 WAC , Clean Vehicles Program pertaining to Electric Vehicles. I am asking you NOT to adopt California's standard of changing to all electric vehicles by 2035. My reasons follow.

To the extent of my knowledge, which admittedly is not comprehensive:

1. There is only one lithium mine in the US that I know of (Nevada). Other lithium mines for EV batteries are in Australia and South America, and they go to China for processing. With the expected demand, and our supply chain issues, it is not feasible to expect that enough lithium for the large number of cars expected will be available.
2. Lithium mining is highly toxic and contaminates water sources. This is one of the reasons there are not more mines in the U.S. Placing a demand for lithium yet not finding a solution for this contamination is negligent on the part of the Dept of Ecology.
3. The creation of EV batteries and vehicles expels a large amount of carbon dioxide, uses large amounts of water or coal for electricity – more than the production of a gas powered car. Where is the energy for creating EV coming from? There is a drought with no end in sight for much of the western US, which will strain the production of the cars, and the overall electrical grid. Some places use gas to make electricity, and one has to ask – if gas is being used for electricity for an EV OR gas is being used to power a car, why impose a change?
4. It is estimated that if a gas powered car can be developed that can get about 51 mpg, it will have a smaller carbon footprint over its lifetime than an EV. Why are we limiting the option to EV instead of encouraging innovation in gas powered cars or other forms of fuel?
5. The average electric vehicle range is a little over 100 miles, causing users to charge almost every night. Where is this electricity coming from, if every household will be doing this? Right after California stated their goal of 2035 for EV, they had a strain on the power grid with a heatwave. We cannot predict the weather of the future, but if we are having this issue already, it is irresponsible to adopt this guideline at this time without a stronger power grid.
6. The practicality of adopting this when the range of an average electric vehicle is just over 100 miles is not sustainable. I personally have a lot of family in Spokane. It's almost 300 miles from my residence. Even if I had a vehicle that could go 200 miles in one charge (I would have to make about twice as much as I do to be able to afford one of these), I would have to stop somewhere in the middle to charge my car. And charging an EV can take easily over 3 hours if there is no Level 3 power charger. There are no EV charging stations at rest stops. The plan is to have an EV station that holds at least four vehicles. With a large majority having to charge their vehicles to get across the state, there is a slim chance one would be available. Not only is the potential for being stranded significantly higher, having to wait to find a spot, and then wait to charge, can extend a 5 hour trip into an 8+ hour trip.
7. Each year, Washington has a few storms with high winds or possibly snow that knock out power. I have had my power knocked out at least 5 times so far this year. The average outage was about 6 hours. One of them was overnight. A couple years ago in a snow event, we were without power for three days. With our gas powered cars, we drove to places with power, and were able to charge our phones, laptops, and do work. If the power is out and we cannot

charge our cars, we would have been stranded without heat or water (we are on a well) for 3 days and with no phone. We live about 2 miles from a bus stop, and a mile from the nearest gas station. I don't want to think about the suffering that would have been experienced.

8. I have a concern that this will now place too much power in the electrical companies. There seems to be a conflict of interest or a potential monopoly because we will be subject to the whims of the power company. Currently, we can hunt for gas at a place that has the most reasonable price for us. We will no longer have that choice, and there is only one power company per region. This is unsettling for a consumer.

I am asking the Department of Ecology to NOT adopt California's standards.

At the very least I am asking that they:

1. Set a date for a few years after California to learn from what was done
2. Not set a date until several pieces of infrastructure needed for daily functioning have begun to be implemented such as freeway charging stations, strengthened power grid, extensive grocery store/mall charging stations, checks and balances on fees charged by power company
3. Provide an 'out' to cancel if it becomes evident that the resources/effects are not feasible or are harmful.
4. Allow for the pursuit of other forms of fuel or for gas powered cars that exceed a 51mpg rating.

My references for some of the above information:

https://www.king5.com/article/news/local/electric-vehicle-charging-stations-washington-state/281-94f1eded-97c0-46c9-b032-10e9c5d28ea5

https://www.solarreviews.com/blog/lithium-mining-in-the-united-states

https://www.wheelspick.com/electric-car-batteries-environmental-impact/

Thank you for your time -

Resident of Issaquah, WA