

## Jim Rosemary

In the strongest possible terms, I urge the WA Department of Ecology to reject the proposed rules, Chapter 173-423 WAC ♦ Clean Vehicles Program, and Chapter 173-400 WAC, General Regulations for Air Pollution Sources.

1) The entire basis for even considering these proposals -- anthropogenic global warming -- has been thoroughly discredited and debunked. Even if it were true, Washington's share of CO2 emissions is microscopic compared to global human emissions. And human emissions only count for a few percentage points of total emissions, 90 % of which come from natural sources. And even if we eliminated ALL emissions from all of humankind, the impact on global temperatures over the next century would be virtually immeasurable -- certainly within the range of natural variability. And, CO2 is not only NOT a pollutant, but we're seeing a "greening" of the earth as our CO2 levels rise. More CO2 is actually a good thing! Warming results in fewer deaths, NOT more! Again, the entire basis for even considering such rules is based on poor science, ill-considered political ideology, and misconceptions or deceit.

2) Eliminating my choice to purchase a vehicle based on the type of engine is contrary to my freedom to do business with whomever I want. Because the number of electric vehicles is limited, this becomes a "forced choice" with the State of Washington putting its thumb on the scale of commerce. This is contrary to our national objective to have a free and fair marketplace.

3) Electric vehicles are an unaffordable alternative for many Washingtonians. Not only the cost of initial purchase, but the cost to maintain (such as more frequent tire replacement) is higher than gas or diesel-powered vehicles. Replacing a battery for an EV can range from \$10,000 to \$30,000! This ruling would impart an additional financial burden, especially on the poor and middle class citizens who cannot afford this option.

4) Electric vehicles actually have a negative impact on the environment. It starts with the mining of rare-earth minerals to manufacture the batteries used in EV's, to the additional increase of tire deterioration that introduces microparticles into the environment, to the disposal of non-recyclable batteries and other components. And what power source is going to charge the batteries? This may necessitate bringing more power plants online that consume more resources. EV's are NOT a "green" alternative, but just the opposite.

5) Washington's electric grid is not up to the task to support a massive increase in EV's. Washington has neither the power generation capacity nor the infrastructure in place to support the necessarily huge increase in electricity demand that will accompany this lurch toward EV's.

For these and many other reasons, I urge the Department of Ecology to reject these proposals and any others like them that may be introduced in the future. Thank you.