



Date: October 19, 2022

Re: WSPA Comments on Washington Clean Vehicles Program (WAC 173-423) CR-102  
Proposed Rule - Proposed Adoption of California's Advanced Clean Cars II (ACC II)

To: Mr. Adam Saul

Department of Ecology

Air Quality Program

P.O. Box 97600

Olympia, WA 98504-7600

Mr. Saul,

These comments are from the Yakima County Farm Bureau (YCFB). YCFB is a grass roots organization with 2700 members consisting of farmers and ranchers with operations both large and small as well as other folks with interest in agriculture affairs in Yakima and Klickitat Counties.

Fundamentally, the YCFB is very opposed to any mandate that forces Washington State residents to buy Electric Vehicles (EV). The YCFB believes that EVs are not a suitable substitute for our current forms of transportation.

EVs in their present form impose a heavy burden on our planet's environment. The amount of CO2 generated in mining the necessary resource materials and manufacturing the required EV battery is roughly equal to what a petroleum powered vehicle produces over its lifetime. Many EVs will require a second (replacement) battery before the EVs useful life ends, thus doubling the generated CO2.

The required amount of mining to obtain the rare earth minerals to produce the battery is most significant. It is claimed that where these scarce materials are found in commercial quantities, it requires the extraction of 500,000 pounds of earth and 500,000 gallons of fresh water to aid in processing the extracted ore, all for just one battery weighing 1,000 pounds that is required for just a single EV car.

The YCFB believes that the electric grid is far from capable of supporting a significant shift to EV. Furthermore, the generating capacity is presently at capacity and there is little surplus capacity to add a new whole cloth use for electricity at present.

While the grid and its power sources are not able to absorb a large new use, there are plans to restrict generating capacity by retiring certain substantial traditional power sources such as petroleum, coal and nuclear. Also, there is serious consideration of removing certain hydroelectric sources through dam breaching. An electric grid that produces less power than what is expected from it will promptly result in brown outs, if not outright area wide black outs.

For agriculture, there are huge ramifications from brownouts and blackouts. Irrigation and all critical operations from tillage, planting, crop care during its growth and harvest can all be affected. If one can't function efficiently, workers arriving to their work without impediment (not waiting for a window to charge EV personal transportation) are necessary. EV Trucks waiting for a charge can't deliver critical supplies or transport crops, many being perishable, to proper storage or to market.

The cost to humanity is also high if we rush to EV and the so-called "renewables". The great majority of the mining and manufacturing of the batteries for EVs and the solar generating complexes envisioned is accomplished in countries under Chinese control or directly in China. It should be noted that these jurisdictions are noted for poor treatment of workers, if not abject slavery.

The COVID-19 Pandemic gave our nation a taste of food disruptions. Reckless mandates will cause much greater disruptions than during the Pandemic and that affects our humanity.

*While it may be satisfying to drive an EV and envision that one is environmentally enlightened but that could not be farther from the truth when the true cost of EVs to the world's humanity and environment are assessed.*

California has become the perfect example of this folly – brownouts, blackouts and restrictions when they can't even charge their EVs. Why would one want to repeat that condition? The YCFB believes the residents of Washington State deserve better and that the WS DOE should assess this issue in light of the real global cost of EV.

Thank you,

Mark Herke

President, Yakima County Farm Bureau