

Rebecca Messinger

From: Douglas Tweet <douglas.tweet@comcast.net>
Sent: Monday, November 27, 2023 10:10 PM
To: Rebecca Messinger
Subject: Comment for the November 28, 2023 Public Hearing: Climate Change and Resiliency Public Participation Plan

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To the Clark County Council:

Every technology has pros and cons. When looking at wide, mandated adoption of EVs both the pros and cons need to be carefully considered. Recently I was made aware of a new paper dealing with the costs of electric vehicles (EVs), presenting data on the “con” side. It seems thoughtful with calculations and over 60 references so data and approach can be checked. The paper is called “Overcharged Expectations: Unmasking the True Costs of Electric Vehicles”, by Brent Bennett and Jason Isaac of the Texas Public Policy Foundation, October 2023

Key points presented are:

- The cost of producing electric vehicles (EVs) is far higher than the prices they are being sold for. Nearly \$22 billion in federal and state subsidies and regulatory credits suppressed the retail price of EVs in 2021 by an average of almost \$50,000.
- Thanks to an unlawful multiplier, EVs receive nearly seven times more credits under federal fuel efficiency programs than they provide in actual fuel economy benefits.
- Regulatory credits with bonus EV multipliers from federal fuel efficiency and greenhouse gas emissions standards and state EV sales mandates provide an average of \$27,881 in benefits per vehicle for producers of EVs.
- Home and public charging stations used by EVs put a significant strain on the electric grid, resulting in an average of \$11,833 in socialized costs per EV over 10 years, which are shouldered by utility ratepayers and taxpayers.
- Direct state and federal subsidies for EVs average \$8,984 per vehicle over 10 years.

The paper can be read in detail at:

<https://www.texaspolicy.com/wp-content/uploads/2023/10/2023-10-TrueCostofEVs-BennettIsaac.pdf>

Something that has concerned me is what happens to my neighborhood electric grid if everyone decides to buy an EV and charge it at home? I did a simple calculation: Assume a typical EV battery has a storage capacity of around 60 kW-hr (Tesla's usually have bigger batteries). How does this compare to a typical household daily electric usage? According to the US Energy Information Administration (<https://www.eia.gov/tools/faqs/faq.php?id=97&t=3>), the typical US household uses 889 kW-hr per month, or about 30 kW-hr per day. If you want to charge your EV, you need another 60kW-hr, so you have to triple your electric power usage. As for your local, neighborhood electric grid, there may be no problem if you are the only one on your block with an EV. But, once everyone is forced to buy an EV, clearly the capacity of the local grid has to be at least tripled. Otherwise, black-

outs could be common. Simultaneously, if natural gas appliances are banned (furnaces, water heaters, ranges), electric demand will be even higher.

Douglas Tweet, PhD (Physics)

Camas

Written Testimony – PPP Climate Change and Resiliency Element

November 27, 2023

Ann Donnelly, 4305 Oregon Drive, Vancouver WA 98661, adonnelly7@comcast.net, 360-921-1281

With regard to the proposed Public Participation Plan for the Climate Change Element of the Comprehensive Growth Management Plan, I support the concept of the three listed advisory groups, under the following conditions to assess costs and risks of proposed changes.

It is essential that the Council provide for a robust spectrum of voices, perspectives, and areas of expertise on each of the three advisory groups, but especially on the CAG. The advisors must include the business community, economic development leaders, individuals with knowledge of actual utility planning for energy resources, law-enforcement/first responders, and health providers, among many others.

The informed participation of these advisors is needed because some of the likely areas of climate actions may substantially impact their areas of responsibility and performance. If so, the exact same vulnerable communities that this plan is empowered to protect may be harmed.

I offer just three examples.

1. Mandates in the eventual Climate Plan, or even just guidelines for energy resource planning, may eliminate fossil fuel supplies that are in place, tested, reliable and affordable, and for which expensive infrastructure and transmission to customers have already been built and depreciated. Without expert input, changes to eliminate such sources could be implemented before reliable, affordable replacements are available with all the required infrastructure and transmission. Costs and timing of replacements must be analyzed. Otherwise, the net effect would be to greatly reduce reliable electricity or natural gas resources that work well, without a workable, cost-controlled substitute. If so, vulnerable communities will suffer the most from more costly, less reliable energy supplies. Utility planners and elected commissioners must be consulted in these cases because utilities hold their exclusive franchises under the condition that they will deliver energy supplies (electricity or natural gas) to every customer at an affordable rate every day of the year, 24 hours a day, no matter how variable the demand is. This obligation must not be abrogated even for the objectives of climate change. If it is, every customer will suffer, and disproportionately vulnerable communities.
2. If actions taken under the eventual Climate Plan place additional costs on the business community (e.g. the requirement to use electricity, not natural gas, for new homes), the construction community will have no choice but to absorb and likely pass on to the customer the likely additional costs that arise when competition among solutions is eliminated. The construction industry here is a leading employer of skilled and unskilled labor, which includes breadwinners in vulnerable, diverse communities. These populations depend on a thriving business community with affordable costs to employ them. So the business community must have a strong and effective voice on these advisory groups.

3. Law enforcement, first responders, and health care providers must be closely consulted on these committees to identify possible new burdens on their operations. Recommendations and decisions must include their input as to how changes, such as mandated replacement of their mobility with EVs, or cessation of use of natural gas, may impact their costs or ability to perform their essential duties. If law enforcement, fire, or EMTs are hampered or their responses slowed, or health care providers burdened with new costs, it will be vulnerable communities, small business, and large retail along with everyone else in Clark County who will be additionally harmed.

Thank you for considering these concerns when the three PPP advisory groups are set up.

Rebecca Messinger

From: Peter L. Fels <plfels@gmail.com>
Sent: Monday, November 27, 2023 8:59 PM
To: publiccomment
Cc: ACE; Don Steinke; Cathryn Chudy; Heidi Cody
Subject: Climate Change and Resiliency Element Public Participation Plan

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Peter Fels
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November 27, 2023

TO: Clark County Council

RE: Comments on Climate Change and Resiliency Element Public Participation Plan

Dear Councilors:

I agree with the proposed resolution to adopt a Climate Change and Resiliency Element Public Participation Plan (“Plan”). I suggest you vote YES on the resolution, BUT **I propose one simple change to the Plan.**

You should adopt a Climate Change and Resiliency Element Public Participation Plan because it is required by State law. Clark County has failed in the past to conform to state law with regard to its planning procedures and those failures have resulted in significant problems and expense to the County (and its taxpayers). A vote to adopt a Plan is to conform to Washington law, as explained in the staff report.

However, the proposed Plan, (Exhibit 1 to the draft resolution) at #5, calls for the Community Advisory Group (CAG) to “form consensus-based recommendations on Climate Change and Resiliency Element goals and policies.” This may be impossible or counter-productive to development of a good plan.

Your consultants advised the CAG be composed of a long list of various “stakeholders” and interested parties. It is likely that some of these parties may disagree as their interests naturally diverge. For example, environmentalists are likely to disagree with some business representatives, and vice-versa. Because of this, it may be impossible to reach consensus, or consensus may only be possible with a very vague plan.

The County should adopt the plan which best coincides with the Legislature’s mandates. Some commenters have already demonstrated they do not want the County to do that. Some of the parties recommended to be on the CAG have historically opposed actions to reduce global warming because doing so will reduce their profits.

For these reasons, I suggest you modify the Plan at Section 5 to read “*The CAG will make recommendations agreed to by a majority of its members on Climate Change and Resiliency Element goals and policies.*”

Thank you for your consideration.

Peter Fels

Rebecca Messinger

From: Clark County <webmaster@clark.wa.gov>
Sent: Monday, November 27, 2023 9:31 PM
To: publiccomment
Subject: Council Hearing Public Comment

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Clark County

Submitted on Mon, 11/27/2023 - 9:31 PM

Name

Susan Saul

Subject

2025 Update Public Participation Plan

Date of Hearing

Tue, 11/28/2023

Comment

As I reviewed the public comments submitted regarding the Public Participation Plan, particularly those from the fossil fuel and real estate industries, I was alarmed that they seem to miss the Plan's spirit and intent to facilitate "a thoughtful, open and equitable process to provide residents, workers and other interested parties meaningful opportunities to discuss climate change and resiliency and shape policy recommendations..." By demanding "executive" roles on the Community Advisory Group, rather than following the open recruitment process outlined in the Public Participation Plan, they clearly expect to steamroll the recommendations and shape them to their industries' financial objectives, which involve slowing the transition to clean energy and undermining the intent of the Legislature in its amendment to the Growth Management Act. Their disdain for the target "vulnerable [to climate change pollution and climate impacts] community member representatives" to have the knowledge, understanding and ability to develop recommendations without their guidance is explicit in their comments.

I urge you to adopt the Public Participation Plan as it is written and to adhere to the policies and procedures in it, including the open recruitment process to identify members of the Community Advisory Group by a neutral party. If you intend to yield to the demands of the fossil fuel and real estate industries to give them executive roles on the Community Advisory Group, you should change the Plan accordingly. Then we will know that "public participation" is a sham and that "a thoughtful, open and equitable process" for all the other citizen interests identified to be part of the Community Advisory Group will not happen.

I urge you to adopt the Public Participation Plan without delay. I look forward to helping plan for a clean fuels future that

protects our health, reduces our greenhouse gas emissions, and makes our county more resilient against climate change.

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Rebecca Messinger

From: Clark County <webmaster@clark.wa.gov>
Sent: Tuesday, November 28, 2023 8:46 AM
To: publiccomment
Subject: Council Hearing Public Comment

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Clark County

Submitted on Tue, 11/28/2023 - 8:46 AM

Name

Margaret Tweet

Subject

Public Hearing: Climate Change and Resiliency Public Participation Plan

Date of Hearing

Tue, 11/28/2023

Comment

Washington State Civil Rights Act was enacted by People as Initiative 200 on the Washington ballot in November 1998 and it passed with 58.22% of the vote. It prohibits racial and gender preferences by state and local government. Full text of current law .

RCW 49.60.400 Discrimination, preferential treatment prohibited.

(1) The state shall not discriminate against, or grant preferential treatment to, any individual or group on the basis of race, sex, color, ethnicity, or national origin in the operation of public employment, public education, or public contracting.

(2) This section applies only to action taken after December 3, 1998.

(3) This section does not affect any law or governmental action that does not discriminate against, or grant preferential treatment to, any individual or group on the basis of race, sex, color, ethnicity, or national origin.

(4) This section does not affect any otherwise lawful classification that:

- (a) Is based on sex and is necessary for sexual privacy or medical or psychological treatment; or
- (b) Is necessary for undercover law enforcement or for film, video, audio, or theatrical casting; or
- (c) Provides for separate athletic teams for each sex.

(5) This section does not invalidate any court order or consent decree that is in force as of December 3, 1998.

(6) This section does not prohibit action that must be taken to establish or maintain eligibility for any federal program, if ineligibility would result in a loss of federal funds to the state.

(7) Nothing in this section prohibits schools established under chapter 28A.715 RCW from:

- (a) Implementing a policy of Indian preference in employment; or
- (b) Prioritizing the admission of tribal members where capacity of the school's programs or facilities is not as large as

demand.

(8) For the purposes of this section, "state" includes, but is not necessarily limited to, the state itself, any city, county, public college or university, community college, school district, special district, or other political subdivision or governmental instrumentality of or within the state.

(9) The remedies available for violations of this section shall be the same, regardless of the injured party's race, sex, color, ethnicity, or national origin, as are otherwise available for violations of Washington antidiscrimination law.

(10) This section shall be self-executing. If any part or parts of this section are found to be in conflict with federal law, the United States Constitution, or the Washington state Constitution, the section shall be implemented to the maximum extent that federal law, the United States Constitution, and the Washington state Constitution permit. Any provision held invalid shall be severable from the remaining portions of this section.

[2013 c 242 § 7; (2019 c 160 § 3, Referendum Measure No. 88 failed to become law); 1999 c 3 § 1 (Initiative Measure No. 200, approved November 3, 1998).]

PDF version at this link <https://app.leg.wa.gov/RCW/default.aspx?cite=49.60.400&pdf=true>

From the CLARK COUNTY STAFF REPORT, DEPARTMENT: Community Planning, DATE: November 7, 2023

"The proposed PPP also outlines the approach for forming three advisory groups:

- The Clark County Council will appoint a Community Advisory Group (CAG) to develop goal and policy recommendations for the Planning Commission and County Council.
- The county will convene an Environmental Justice Coalition (EJC) made up of organizations who the county will hire to help design and implement community engagement with community groups who are most vulnerable to climate pollution and the impacts from climate change such as extreme heat, flooding, and wildfire smoke, and to guide the equity framework used throughout this project. Representatives of the EJC will also serve on the CAG."

My comment: The "Environmental Justice Coalition" consists of handpicked community members or groups who are paid by the county, which amplifies their voice. This coalition will also have the dual role of participation as a member of the Citizen Advisory Group also, which multiplies their voice even further. Meanwhile, some citizens & businesses are not included in lengthy stakeholder lists prepared by consultant. Please insure that the PPP fairly reaches out to all Clark County.

See article about costs of widespread and rapid EV adoption.

The Biden Administration's EV Goals Are an Expensive Fantasy November 21, 2023

The Biden administration is pushing for widespread electrification in less than 20 years through government subsidies and coercive regulations as part of its aggressive climate agenda. The truth is that President Joe Biden's goals are an illusion at the expense of the American people.

While EV proponents try to claim that EVs will soon be cheaper than gasoline vehicles, our new research demonstrates that EVs benefitted from hidden subsidies that total nearly \$50,000 per EV.

Who is footing that bill? Gasoline vehicle owners, taxpayers, and utility ratepayers are.

Electric vehicles primarily benefit from regulatory credits and generous fuel economy standards, which average \$27,881 per vehicle. EVs have been given an unlawful 6.67 multiplier to their rated fuel economy, so that an EV with a rated fuel economy of 100 miles per gallon is credited as if it is getting 667 miles per gallon. What's more, the EPA's proposed fuel economy standards are designed to require that 67% of new passenger cars sold be all-electric by 2032, demonstrating a clear government preference toward EVs without proper consideration of costs and benefits.

For gasoline vehicles, the price you see at the gas pump covers the cost of extracting, refining, and transporting the gasoline, but the same cannot be said for the cost of charging an EV. EVs require new charging infrastructure, and their large power draw increases the strain on electricity infrastructure. As our research highlights, a typical EV charging overnight at home consumes as much power as several homes, and an EV charging at a fast-charging station in 30 minutes consumes as much power as a small to medium-sized grocery store. A few extra EVs in the neighborhoods are manageable, but widespread EV adoption will require significant and expensive grid upgrades.

Adding insult to injury, EV owners alone aren't shouldering these increased electricity costs, which average \$11,833 per vehicle over 10 years. Until a utility starts charging EV owners for the extra infrastructure costs to serve them, those costs are shared among all the utility's customers. Residential electricity costs across the U.S. have risen 20% over the last three years, and a rapid forced adoption of EVs will only make this problem worse.

Direct federal and state subsidies provide EVs with another \$8,984 per vehicle over 10 years, including the widely publicized \$7,500 federal tax credit in the so-called Inflation Reduction Act and smaller state subsidies for EVs. Author: Brent Bennett, Ph.D., is policy director for Life:Powered and a former battery researcher & engineer. https://www.realclearenergy.org/articles/2023/11/21/the_biden_administrations_ev_goals_are_an_expensive_fantasy_994010.html

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