

National Highway Traffic Safety Administration (NHTSA),
Department of Transportation (DOT)

Re: Docket No. NHTSA-2022-0048
Exemptions From Average Fuel Economy Standards: Passenger Automobile Average Fuel
Economy Standards

In this comment set forth below, we will discuss:

1. Mr. Biden and Global Warming Policy Hypocrisy.
2. Anthropogenic CO2 Global Warming is Junk Science.
3. An Alternative Simplified CAFE Regulation.

1. Mr. Biden and his Global Warming Policy hypocrisy

This comment refers to Mr. Biden.

The 2020 presidential election was rife with rampant illegal fraudulent votes for Democrat Candidate Joe Biden. The movie "2000 Mules" documents tens of thousands of illegally harvested votes for Joe Biden in key swing states. In a deplorable repudiation of our democracy, dozens of courts have thrown out citizen's lawsuits demanding investigations of election fraud. Citizen's lawsuits were thrown out due to standing, meaning that regardless of the evidence of election fraud, citizens have no right to question the election result.

For example, in Georgia, there are six affidavits signed under oath documenting 30,000 fake ballots for Joe Biden and the two democrat U.S. Senate candidates. Fulton County Elections officials hired very expensive private criminal defense attorneys, Garland, Samuel & Loeb, PC to fight the suit to investigate the ballots. What are they hiding? The Georgia Bureau of Investigation is politically compromised and refused to fully investigate the ballots. The Georgia Court of Appeals dismissed the case due to standing. Until these ballots are examined by a credible investigator, we do not know who won the presidential election in Georgia.

Arizona counted 19,000 ballots submitted a day late on November 4th.

The Department of Justice and the Federal Bureau of Investigation are politically compromised and refused to investigate the 2020 presidential election fraud.

With election perfidy investigations blocked by democrat politicians, compromised agencies, and feckless judges, we just don't know if Joe Biden was duly elected president. We don't know if the two senators from Georgia were duly elected. The failure to ensure and unwillingness to verify a fair 2020 election has imperiled our democracy. What is our democracy if elections can not be trusted?

The disputed 2020 election has had a huge affect on Federal Global Warming policies.

As soon as Mr. Biden, a qua climatologist, took office, a locust swarm of Global Warming Alarmists infested the Biden administration. Candidate Joe Biden's campaign promise was to solve The Global Warming Crisis while at the same time creating millions of "good paying union jobs".

Mr. Biden's hypocritical and wasteful Global Warming policies are an enormous deadweight loss on the U.S. economy, costing jobs, costing taxpayers, and costing people's lives.

On day one Global Warming Alarmists hornswoggled a befuddled Mr. Biden into canceling the permit for the Keystone Pipeline, throwing 10,000 workers out of work. A nasty surprise for the hapless Pipefitters Union, which had endorsed Candidate Joe Biden.

Mr. Biden's hypocrisy was on full display with his comical 21-car motorcade to the November 2021 COP26 Global Warming Conference in Glasgow. The 21-car motorcade was a cutback from Mr. Bidens enormous 85-vehicle motorcade in Rome for his visit with Pope Francis. Many of these vehicles were flown across the Atlantic Ocean in kerosene-guzzling Air Force One and other air transports. Like Mr. Biden, Pope Francis has become a qua climatologist, pontificating that "we have no time to wait" on climate change.

If Mr. Biden was sincere about substituting renewable energy for fossil fuels he would do everything and anything to minimize the costs of renewables. Instead, he touts creating millions of "good paying union jobs", payback for union campaign money. More hypocrisy is evident in Mr. Biden's policies that needlessly increase costs of renewables or waste fossil fuels, thereby exacerbating the Global Warming Crisis:

A. China is the low-cost producer of solar panels by a significant margin. Cheap Chinese subsidized solar panels are a magnanimous gift from China to the world to accelerate renewable energy. Unfortunately, starting with Nobel Prize winner President Obama, tariffs have been charged significantly increasing the cost of Chinese Solar panels for U.S. buyers. Mr. Biden has kept Obama's solar panel tariffs.

B. A small California solar panel company, Auxin Solar, complained that cheap Chinese Solar panels were being shipped through other Asian countries to avoid the tariffs. In response, Mr. Biden's tariff regulators have shut down solar panel imports from all over Asia while the trade complaint is investigated. This regulatory kerfuffle and import ban have thrown the whole U.S. solar industry into chaos.

C. Starting with the Trump Administration, U.S. offshore wind power farms are finally being approved. A 1920 cabotage law, the Jones Act, mandates expensive U.S. flagged ships between U.S. ports. Mr. Biden has extended the Jones Act to mandate expensive U.S. flagged Jones Act supply ships for U.S. offshore wind farms. For Mr. Biden, "good paying union jobs" on expensive U.S. flagged ships are more important than low-cost offshore wind power.

D. The Federal Government's answer to its needlessly increased costs of renewables was designed many years ago by squadrons of expensive K-Street lobbyists. Massive subsidies of \$23 per MWH are paid to renewable power producers. These subsidies were initiated in 1999 to accelerate renewable development. Lobbyists promised to end subsidies when renewables reached full development, so the subsidies expired every few years. They have been extended 13 times. Every few years squadrons of expensive K-Street lobbyists infest Congress and the Department of Energy like hooked heroin addicts begging for extended subsidies. Squadrons of expensive K-Street lobbyists cleverly designed a lifetime career path for themselves of periodically begging Congress and the DOE for extending federal energy subsidies.

Wind subsidies are so high that unneeded wind power is frequently sold at negative prices. When power demand is low, grid operators are paid as much as \$20 per MWH by wind farms to take away unneeded wind power so wind farms can capture the \$23 per MWH federal subsidy.

E. Mr. Biden wants to spend \$66 billion on upgrading Amtrak. Every time I see a nearly empty Amtrak train thundering up the 6,887 ft Donner Pass, climbing the grade, hauling a string of heavy railroad cars, exhaust stacks blasting into the mountain air, I wonder about this colossal waste of diesel fuel. And Mr. Biden wants more of that. Amtrak is Exhibit A of Mr. Biden's "good paying union jobs", regardless of economic sense, and regardless of environmental impact. Somebody has to do a study of Amtrak's horrendous diesel fuel consumption and CO2 footprint per passenger mile.

F. Mr. Biden is about to sign the rediculously named "Inflation Reduction Act", a 755 page \$485 billion tax and spend monstrosity. This bill is every liberal lobbyist's wish list stapled together into a giant waste of tax money. Union lobbyists got repaid for helping elect democrats, almost everything in the bill is more costly with Davis - Bacon mandated union wages. Companies get socked with \$468 billion of new taxes, costing gobs of jobs. This is pure tax and spend madness.

The bill spends \$370 billion on "climate change". Renewable energy lobbyists got paid with a gusher of corporate welfare. How many more Solyndras will happen? Again, almost everything in the bill is more costly with Davis - Bacon mandated union wages. The United Nations' own climate modeling estimated a global temperature reduction at the end of the century by all of -0.028 degrees Fahrenheit in the optimistic case. In the pessimistic case, the temperature difference will be -0.0009 degrees Fahrenheit. Is this infinstimal temperature difference worth \$370 billion? That's \$1,000 per U.S. resident.

G. The 400lb gorilla in electric power generation is nuclear, at 19% of U.S. production. Nuclear power is the most obvious solution for reducing fossil fuel burning. Nuclear power plants do not emit any CO2, and radiation has never killed anyone in the U.S.A. Modern modular designs are very safe. Spent nuclear fuel could be recycled with very little waste if not for the 1980's ban on fuel recycling inspired by 13-year-old Amy Carter. Mr. Biden and another politically ambitious qua climatologist, California Governor Gavin Newsom, doesn't want to extend nuclear power plant licenses, letting them expire instead, thereby forcing these zero CO2 emissions plants to close. At least five nuclear power plant license extensions are currently in jeopardy at the U.S. Nuclear Regulatory Commission.

Global Warming Alarmists' quixotic rejection of nuclear power tells you all you

need to know about their real hidden agenda. Global Warming Alarmist's policy agenda always insists on big expensive government programmes for "climate change" but the real goal is income and wealth redistribution. The Global Warming Crisis is a convenient vehicle for forcing less freedom, more tax slavery, bigger government, more regulations, and ultimately income and wealth redistribution.

The disputed 2020 election has also affected Federal regulatory agencies. Michael S. Regan, appointed by Mr. Biden and approved by the Senate, was sworn in as the 16th Administrator of the United States Environmental Protection Agency on March 11, 2021, becoming the first Black man and second person of color to lead the U.S. EPA. Dr. Steven Cliff, Ph.D. was appointed by Mr. Biden and approved by the Senate as administrator of the National Highway Traffic Safety Administration.

In addition to EPA and NHTSA leadership, it is quite clear that Global Warming Alarmists have also infested the staff of these agencies. And they have been very very busy. On March 31, 2022 NHTSA Finalized new more drastic Corporate Average Fuel Economy (CAFE) Standards. The new rule, 49 CFR Parts 531, 533, 536, and 537 [NHTSA-2021-0053] RIN 2127-AM34 "Corporate Average Fuel Economy Standards for Model Years 2024-2026 Passenger Cars and Light Trucks" is a sea monster of regulations measuring a broddingnagian 383 pages of inscrutable nonsense that only an environmental lobbyist could love.

According NHTSA the final rule establishes standards that would require an industry-wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026, by increasing fuel efficiency by 8% annually for model years 2024 and 2025, and 10% annually for model year 2026. The agency projects the final standards will save consumers nearly \$1,400 in total fuel expenses over the lifetimes of vehicles produced in these model years and avoid the consumption of about 234 billion gallons of gas between model years 2030 to 2050. The agency also projects the standards will cut greenhouse gases from the atmosphere, reduce air pollution, and reduce the country's dependence on oil.

In other words, federal government diktats mandate ever higher and higher fuel economy, pressuring car companies to build more smaller, lighter, whimpier cars regardless of consumer demand. NHTSA's own data estimates thousands of people will die in mandated small cars, sacrificed to "cut greenhouse gases from the atmosphere, reduce air pollution, and reduce the country's dependence on oil."

In the current proposed regulation, seven specialty car companies are begging for relief from the latest CAFE rules. The regulation is titled "Exemptions From Average Fuel Economy Standards: Passenger Automobile Average Fuel Economy Standards."

2. Anthropogenic CO2 Global Warming is Junk Science.

A. Global Warming Data Fraud.

Global Warming Alarmists have used lies and doctored data for decades to promote their policy agendas toward income and wealth redistribution.

Global Warming Alarmists' perfidy was rampant in the infamous ClimateGate scandal. Leading global warming climatologists were caught fraudulently doctoring temperature data to increase Global Warming. The United Nations Nobel prize-winning Intergovernmental Panel on Climate Change (IPCC) used temperature data from East Anglia University's late Keith "Fudge Factor" Briffa, Ph.D. whose computer code contained what he called "fudge factors" adding up to 0.75 of a degree to increase the recent temperature data. In addition, climate scientists conspired to expunge the high historic temperatures of the Medieval Warming Period. In the MWP the Earth was so warm that Greenland was actually green. Deleting the MWP made the current warming look unique. It is not. Furthermore, Pennsylvania State University Prof. Michael "Hide the Decline" Mann, Ph.D. fraudulently spliced two temperature data sets. To make them match he raised the lower data set to match the higher data set where they overlapped. This hid a discrepancy that would have shown up as declining temperatures. Prof. Mann was nearly fired for this breach of the academic research protocol.

The ClimateGate Scandal showed there is an abundance of man-made global warming data. But not so much man-made global warming. Like the made-up temperature data, Nobel Prize winner President Obama made up a number when he said "97 percent of climate

scientists agree that climate change is real, man-made and dangerous."

In fact, there are a lot of respected scientists that disagree, and probably many more that silently disagree. What we have here is an Asch conformity syndrome. Pressure from a group leads people to conform, even when they know that the rest of the group is wrong. Pressure is endemic. The academic peer review process has been corrupted. It's a lynch mob. Doubting scientists can't get research grants, can't get their research published, and don't get hired for climate policy jobs. Among academia, these "Climate Deniers" are one cut above a leper with a bell. Nobel Prize winner Al Gore said Climate Deniers were just like the hundreds of police officers who stupidly stood by while Salvador Ramos shot and killed 19 people in Uvalde, Texas.

B. Proof that Man Made CO2 Has Not Warmed the Earth.

The science is not settled. Blaming man-made Carbon Dioxide, CO2 molecules, for The Global Warming Crisis is junk science.

We can agree that the Earth has warmed by about +1.0C degree during the Industrial era. We can also agree that CO2 has increased +0.013% from 0.028% of the atmosphere to 0.041% during the Industrial era. However, correlation does not prove causality.

CO2 is a tiny trace gas. Envision this: If you are in a room with a 9 ft ceiling and all the gasses were stacked, the pre-industrial CO2 layer would be as thin as a credit card. The raised letters on the credit card are as tall as all the extra CO2 added during the industrial age. It is this tiny thin layer of an invisible gas that has got potty mouth Greta Thunberg, Nobel Prize winner Al Gore, befuddled Mr. Biden, and all the other Global Warming alarmists panties in a bunch. An invisible layer of gas as thin as the raised letters on a credit card.

How an infinitesimal +0.013% increase in CO2 can cause a +1.0C degree increase in the remaining 99.987% of the atmosphere defies any explanation.

The Global Warming - CO2 gas math is quite simple. And physically impossible. The Earth's atmosphere has warmed +1.0C degrees during the industrial era. The added CO2 during the industrial era is one part in 7,700 of the atmosphere. To heat the atmosphere +1.0C degrees, the added CO2 molecules must contribute +1.0C x 7,700 or +7,700C degrees of heat. The surface of the Sun, 93 million miles away, is 5,700C degrees. It defies common sense, and physics, that the Sun's surface heat, at 5,700C degrees, can travel 93 million miles through space and then heat Earth's CO2 molecules hotter than the Sun at 7,700C degrees.

To make the CO2 heat pencil out, Global Warming Alarmists claim there is a CO2 greenhouse heat feedback effect which amplifies the Sun's warming, a gimmick with the fancy name of "Radiative Forcing". The extra heat is impossible. CO2 can't add more heat than it absorbs. CO2 is an inert gas. There is no exothermic chemical reaction.

The planet Venus has been hailed by climate scientists as an example of CO2 caused Global Warming. Yes, Venus is very hot, 460C degrees. But conditions on Venus are extreme. The dense atmosphere is 96.5% CO2. Surface air pressure is 1,300 Pounds per square inch, equal to 93 Earth atmospheres. That amounts to 220,000 times as much CO2 as the Earth. Plus, at 67 million miles from the Sun, Venus receives twice the sunlight energy per square meter as the Earth. The extreme CO2 density, high pressure, and strong sunlight conditions combine to make the Venus CO2 warming effect 4.1 million times greater than the Earth's CO2.

Man-made CO2 molecules are not the control knob for the Earth's temperature.

Don't be hornswoggled by Global Warming Alarmists. It's junk science!

3. An Alternative Simplified Global Warming Disclosure Regulation.

You gotta wonder who wrote the massive inscrutable 393-page CAFE regulation? Answer: Expensive K-Street lobbyists, expensive environmental consulting firms eager to get hired for projects, union lobbyists, lawyers eager for all the resulting lawsuits, and the nameless faceless Global Warming Alarmists bureaucrats that have infested the EPA, and NHSTA. It is 393 pages of dreadful hooley that only a \$450 per hour environmental consultant lawyer could love.

I propose an addition to the CAFE Regulations.

Mr. Biden has greatly increased the CAFE fuel economy mandates for cars and trucks. NHTSA data estimates CAFE mandated small cars will kill thousands of Americans. To help sell more small cars I propose a federal incentive programme for small car buyers: "The Fuel Efficient Car Crash Corpse Closed Casket Funeral Entitlement", known by the acronym "FEFE". FEFE pays for closed casket funerals for these lost lives, that have been sacrificed to save gas and save the planet. If you go in a Yugo, or are dying in a Scion, or left us in a Tesla, FEFE has you covered.

In summary, what we have here is a President and Senate that may have been fraudulently elected, infested the federal government with Global Warming Alarmists, using a global warming theory tainted with fraudulent junk science, to force-feed wasteful Global Warming policies that are a massive deadweight loss on the U.S. economy, costing jobs, costing taxpayers, costing people's lives, and in the instant case, appointing EPA and NHTSA officials mandating CAFE, a 393-page monstrosity of utterly useless global warming regulations.

Thank you for your consideration.