

Comment from Conrad Ko

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Climate change (more accurately known as the climate catastrophe) is an EXISTENTIAL threat to the human species! So, URGENT, DRASTIC action must be taken! This, along with chlorofluorocarbons ("CFCs"), are unlike other environmental protection matters besides because they are existential threats to the survival of the human species while others are not, especially due to the presence of climate tipping points. So, I strongly urge the Environmental Protection Agency ("EPA") and National Highway Traffic Safety Administration ("NHTSA") to require all newly produced light-duty vehicles ("LDVs") be zero-tailpipe emissions by no later than model year 2030 and heavy-duty vehicles ("HDVs") no later than model year 2035. Biofuel must definitely not be tolerated and be banned too, because they actually have even higher greenhouses gas emissions due to forests being clear-cut to make land available for biofuel plantations. So, the internal combustion engine ("ICE") must be banned entirely, even if they use exclusively biofuels. Hybrid electric vehicles ("HEVs") must not be tolerated and must also be banned because they are still entirely powered by fossil fuels, only that their fuel economy is moderately higher due to having regenerative braking to recover some of the lost energy during braking. On the highway at constant speed, HEVs have no advantage over the conventional ICE as a result. As a result, HEVs are mostly a scam because most driving is done cruising on the highway or suburban thoroughfares rather than stop-and-go city or rush hour driving.

Even the planned regulation in the stage of finalization by California to ban all new ICE LDVs by 2035 and HDVs by 2045 is nowhere near enough. Existing vehicles will be allowed to continue to operate. However, due to how long modern ICE HDVs last, a ban by that date will not make meeting the mandate of carbon neutrality by 2050 under the Paris Climate Agreement possible. Most modern ICE HDVs last around 1,000,000 miles before needing replacement, which is around 12-15 years with the normal annual mileage. So, it is recommended that the ICE ban for new HDVs be pushed forward to no later than 2038, preferably 2035, in order to be able to meet the target of net zero emissions by 2050 under the Paris Climate Accord. Even the vast majority of LDVs today last at least 250,000 miles, as said by General Motors. And that is from American manufacturers. Cars from top-selling Japanese automakers, who totally outsell American automakers besides full-size trucks, last even way longer, usually around 700,000 miles when people don't skimp on oil changes. The typical driver puts 13,500 miles per year on their LDV. So, we're looking at 18.5 years for American cars and 51.85 years for Japanese cars that they'll continue to be the daily driver on the road. So, registrations of new ICE LDVs should be banned no later than model year 2032, preferably 2030, in order to meet the carbon neutrality promise by 2050 under the vital Paris Climate Agreement of 2015, of which the United States ("US") rejoined in 2021 under the order of the current Biden Administration, which will likely continue to be so in 2025-2028. That is because the Republican Party is unlikely to win the Presidential election again because a large proportion of them are starting to die off from old age, especially nasty insurrectionist Trump supporters.

This is an extremely vital mandate to comply with because anthropogenic climate change ("AGCC") is an existential threat to the human species (unlike other environmental matters besides CFCs), which will do so by drastically worsening droughts, increasing wildfires, and

worsening floods by an unimaginably huge amount, consequently severely dwindling food supplies all over the globe. We've already seen the unprecedented string of wildfires and heat waves since 2017, and even that (the present) is still nothing compared to what will come if society continues on pumping out greenhouse gases at the current rate. As a result, I strongly urge not only the California Air Resources Board ("CARB"), but also the EPA and NHTSA to take urgent drastic action by banning all new ICEs outside of light-duty vehicles by 2035. Even Washington is doing so by just 5 years after that date (2030 for LDVs, 2040 for HDVs), so the State of California, which has historically lead on climate change regulations, should not let itself fall behind other states. California is so lackluster in climate change regulation nowadays that I think that even the federal government should step in and leapfrog California on such pressing matters. Most other developed nations such as our neighboring Canada, the United Kingdom and Ireland, have decided to ban registrations of new ICE LDVs by 2035, 2030, and 2030 respectively, with the date for HDVs being 2045, 2035, and 2035 respectively, with even the entire European Union confederation having decided to follow Canada's and California's dates on ICE bans.