

Subject: Public Hearing Comments

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From: DoNotReply@delaware.gov

To: HearingComments, DNREC (MailBox Resources), Donpopeinsure@gmail.com

Comments on 2022-R-A-0011: Low Emission Vehicle Program

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Organization:

Comments:

I am a supporter of the transition to EVs, however, what proposed implementation of EV mandates will devastate the RV industry and create very dangerous towing situations on our highways due to the limited towing capabilities of EV pick-up trucks. The legislation is well intended but not well thought out as it relates to the vehicles weight and safe towing capabilities. Currently, a small fifth wheel RV with an average weight requires a 3/4 or 1 ton rated diesel truck in order to legally tow. There are some newer gas trucks that can safely tow an average fifth wheel also. 1 ton diesel pick-up trucks with single rear wheels weigh around 9800 lbs. Many dual rear wheel (AKA Dually) typically weigh less than 14,000. Based on what Delaware is proposing, no trucks would be available to tow RVs like a 5th wheel. Additionally, many 3/4 and 1 ton dually trucks are used for as transport or car haulers. These would be eliminated. If one were to conduct market research, you will find that there are no 3/4 ton or 1 ton EV pick-up trucks in development. The current EV technology is focused on the range of the vehicle. The focus on range ignores the torque and frame rigidity required to safely tow. Diesel trucks along with some new gas powered trucks can produce high torque numbers for an extended period of time. If Delaware were to query EVs engineers, they would openly share that EVs can't safely tow weights in multiple of their own weight. Here is an example of how problematic this situation can be with the most successful EV pick-up truck to day. Currently, the EV Ford F150 Lightning has a range of approximately 300 miles. That range cuts in half when towing a simple 7000 lb trailer. That is only 150 miles before recharging would be required. This data is from credible reports or reviews by professionals and can be easily found online. To complicate the matter, imagine if this vehicle attempted to tow a 5th wheel of average weight. In this scenario, a small 12000 lb fifth wheel would cut the range to 75 miles. The above towing scenario would not be practical for any driver. Additionally, the combined weight of the EV and the trailer would put it over-weight and in violation of Title 21. There literally is no EV truck that can tow a fifth wheel trailer of any reasonable distance because there are no such thing as 3/4 ton or 1 ton EV truck. The Ford F150 Lightning and the Chevy Silverado EV are the only pick-up EVs with any reasonable tow capacity yet neither can tow a small 12,000 lb fifth wheel trailer. In fact, neither can tow more than 10,000 lbs regardless of configuration. It should be noted that many of these trailers weigh in excess of 18,000 lbs. RV Dealerships may be asleep at the wheel and don't realize how this will impact their businesses. As the used diesel 3/4 and 1 ton diesel trucks age away, there won't be a EV product that can tow higher weights. Consider this, EVs pick-up trucks can't tow loads greater then their own weight. In many cases, diesel trucks can tow weights greater than their own weight sometimes in multiples. Many times, these multiples of weight vs tow capacity is required to safely tow. This legislation will force owners tow with any remaining gas or diesel truck regardless of its payload and tow capacity. This is unsafe and would create significant liability to the drivers should they be involved in an accident. Here is a solution, change the weight for guidelines to the transition. Currently, the proposal says all vehicles and pick-up trucks 14,000 pounds and under. A change to cars 14,000 lbs, pick-up trucks 8,999 lbs and under, would be a workable solution. Most registered pick up trucks in the country are considered 1/2 ton such as the Ford 150 Lightning EV or Chevy Silverado EV. This would create a "carve out" for 3/4 ton and 1 ton rated trucks to safely tow. Please don't destroy the RV business and the RV experience. Please don't destroy the small business person that hauls large heavy loads with diesel or large gas trucks. Please don't force drivers to use vehicles that are underrated for towing as it is unsafe. While there may be a significant technology jump in the coming years as it relates to EV towing, it is short sighted to put the legislation ahead of the technology. Not all vehicles are delivered to dealerships on 18 wheeler trucks. Many are moved regionally with smaller car carriers being towed by diesel pick-up trucks under 14000 lbs truck weight. In a final bit of irony, this legislation would eliminate the small car

carriers being towed by diesel pick-up trucks that deliver the new EVs to the dealer's lots. If an 18 wheeler is not available or practical, how would the new EVs get to the dealerships under this new proposed legislation? Thank you for your consideration, Don Pope