

April 18, 2023

Angela Marconi, Director
Division of Air Quality
Delaware Department of Natural Resources and Environmental Control
100 W. Water Street, Suite 6A
Dover, DE 19904

Dear Director Marconi,

The undersigned organizations, representing both state and national interests, write in opposition to proposed amendments to regulation 7 DE Admin. Code 1140 – *Delaware Low Emission Vehicle Program*. The proposal seeks to bring California’s Advance Clean Car II (ACC II) emissions standards to Delaware by mandating that all new cars sold in the state be electric by 2035. The proposal would also require a set percentage of hybrids and electric vehicles on dealer lots beginning in 2027.

Several concerns draw us to this opposition, including the initial cost and upkeep of electric cars, the infeasibility of electric vehicles in rural areas, and the effect of a government-imposed mandate on the free market.

With inflationary pressures already putting the squeeze on household budgets, it is completely unreasonable to ask Delawareans to shoulder even more daily costs. Delaware’s average per capita income is \$38,917, according to the latest numbers from the U.S. Census. The Kelley Blue Book reports the average price for a brand-new electric vehicle at \$55,000, while the average four-door sedan cost around \$35,000. Going beyond that initial \$20,000 price difference, the American Automobile Association (AAA) also estimates that electric vehicle owners spend, at minimum, \$600 more annually than combustion engine-powered cars. The initial cost and maintenance of electric vehicles is an overwhelming burden to ask of the average Delawarean.

Despite its size, Delaware is still mostly rural below the Chesapeake and Delaware Canal. At a U.S. House Agriculture Committee hearing in January 2022, Mark Mills, senior fellow at the Manhattan Institute, testified that EVs “can’t meet the overall practical performance requirements, especially in rural areas.”

Specifically, there are a number of hidden costs in rural areas, including more power grid outages which are already 50% more frequent than in urban areas. Rural residents are still able to travel in a power outage with a full tank of gas. However, if a grid outage happened and the only available vehicle was electric, the homeowner would have had to spend over \$30,000 on installing a home-based battery storage system that could hold enough backup power to fill up just half of the pickup truck's battery.

By definition, rural areas are sparsely populated, and as such, those living in these regions are largely self-sufficient. Therefore, it is not only the lower driving performance of electric vehicles

that worries rural Americans, it's the unreliability of these vehicles in the case of a natural disaster or emergency situation that causes concern.

Lastly, electric vehicle ownership shouldn't be a decision made by the government. A free market is one that operates voluntarily, with little or no government control. The proposed amendments give the executive branch the authority to choose winners and losers in the marketplace by supplanting traditional auto manufacturers through the subsidizing of electric vehicle manufacturers.

For consumers seeking to purchase electric vehicles, we recognize their place in the greater automobile marketplace. However, not all Delawareans would like to own a costly electric vehicle. [Recent surveys](#) have indicated a substantial majority of residents are opposed to the mandate.

The undersigned organizations would like to join the majority of Delaware residents in opposition to proposed amendments to the Delaware Low Emission Vehicle Program in accordance with California's ACC II standards. We urgently request that this proposal be abandoned by the DNREC to address the above concerns expressed by its own residents.

Sincerely,



American Agri-Women



Delaware Equine Council



The Rural & Agriculture Council of America



Mid-Atlantic Soybean Association