

Subject: ACC II Rule Comments

Date: Wednesday, April 26, 2023 at 8:58:33 AM Eastern Daylight Time

From: Ken Gigliello

To: HearingComments, DNREC (MailBox Resources)

Here are my comments on the proposed ACC II rule:

My name is Ken Gigliello and I live in Frankford, Delaware. I am commenting on this rule because I am very concerned about the future for my children and grandchildren. Specifically I am concerned about air pollution from internal combustion engines and the continued use of fossil fuels which is a major driver of climate change.

I worked for the USEPA for over 33 years and personally saw the environmental and health damage done by air pollution as an environmental inspector. Also I recently went to purchase a new car and no electric vehicles were on the lot to test drive. This needs to change to give people choices beyond gas powered vehicles.

The internal combustion engine is very inefficient. Only between 30-35% powers the vehicle. The remaining 65-70% is wasted in the form of heat. This should convince many people that gas versus electric engines is a no-brainer. Electric engines convert more than 80% of electrical energy into mechanical energy to move the vehicle, and they don't create toxic emissions that affect the environment and public health. .

Gasoline engines create fine particulate matter, sulfur dioxide, carbon monoxide, and nitrous oxides. These emissions cause both environmental and health related damage and they disproportionately affect communities located near highways, rail yards, ports, and warehouses.

If is estimated the ACC II standard would reduce light-duty NOx emissions by 79%, light duty PM2.5 emissions by 48%, and light duty SO2 emissions by 48% below 2021 levels in Delaware. That is a major reason the standard should be passed.

Transportation is currently the largest source of greenhouse gas emissions in Delaware. Passenger vehicles account for 61% of the total emissions from the transportation sector in the state. The transportation sector, specifically light-duty vehicles, are a major contributor to toxic air pollution. Exposure to air pollution can lead to health problems including increased risk of [asthma, lung disease and cancer](#).

The ACC II rules will open the secondary EV market so more of the 75% of car drivers who buy used vehicles will have more choices when purchasing a used car. Clean, electrified transportation is already a [fast-growing source of high-paying jobs](#), increasing exports and manufacturing in the state. Strong sales targets in Delaware can build on this progress. Over a quarter-million people were employed in the clean vehicle industry in 2019. As of today, over \$300 billion in global private investments have been directed toward electric vehicles. States in the US are poised to receive billions in the next decade for EV charging infrastructure. Delaware is set to receive around \$15 million over the next five years and is planning on building dozens of

rapid chargers, all of which will come online well before 2035.

Finally, Delawareans are interested in buying electric vehicles – over 5% of vehicle sales in Delaware in 2022 were EV, and these numbers are increasing each year. By adopting ACC II it will send the message to the auto industry that Delaware intends to sell EVs. This message entices private EV charging companies to invest in developing infrastructure in Delaware, because they know the demand will be here. Without ACC II, we are restricting our state to public funding for this buildout. We are also caught in a paradox for the cars themselves. Car companies will mainly focus on delivering electric vehicles to ACC II states and they won't work without adopting ACC II to increase the supply of those vehicles. Without adopting strong electric vehicle rules, Delawareans will be left out of electric vehicle benefits that nearby states like Maryland and New Jersey will have access to.

Thank you for the opportunity to comment.