

May 6, 2023

Theresa Newman, Hearing Officer
c/o DNREC Office of the Secretary
89 Kings Highway
Dover, DE 19901

Emailed to: DNRECHearingComments@delaware.gov

Re: Comment on Delaware Low Emission Vehicle Program

I am commenting to support Delaware’s Amendments to 7 DE Admin. Code 1140, the Delaware Low Emission Vehicle Program.¹ These Amendments and associated zero-emission vehicle provisions will be good for human health, good for the climate, and good for business.

By way of background, I am a long-time resident of New Castle County. I can often be found enjoying the trails in our parks, and I am a hobbyist gardener. I have years of experience in the energy industry. I am an economist by training with a doctorate in natural resource and environmental economics. Through my firm Better Measures LLC, I offer consulting services on energy and environmental regulation and policy.

Low Emission Vehicle Program Will Be Beneficial to Human Health

One reason I support the Delaware Low Emission Vehicle Program is because it will reduce tailpipe pollutants that harm human health. Traffic-related air pollution can trigger asthma attacks, induce acute respiratory illness, and harm the most vulnerable people. With evolving respiratory threats such as variants of COVID-19 and Respiratory Syncytial Virus (RSV), it is doubly important to act. Cutting tailpipe emissions will reduce the incidence of asthma attacks, hospital and emergency room visits, and school and workdays lost to respiratory illness.

High heat days compound the health risks from air pollution stemming from tailpipe emissions, and we are experiencing more high heat days than in the past. Since I moved to New Castle County thirty-plus years ago, there’s been a 50% increase in days when the “feels like” temperature exceeds 90°F, from 32 days to 48 days.² These high heat days are called “health-caution days.” According to risk assessments for New Castle County, this count will rise to 67 days in the next 30 years, amplifying the health benefits from any tailpipe emission reductions the Delaware Low Emission Vehicle Program achieves.

¹ Amendments to 7 DE Admin. Code 1140, Delaware Low Emission Vehicle Program, accessed 5/6/2023, <https://regulations.delaware.gov/register/april2023/proposed/26%20DE%20Reg%20823%2004-01-23.htm>

² Risk Factor Heat Risk Overview, https://riskfactor.com/county/new-castle-county-delaware/10003_fsid/heat

Low Emission Vehicle Program Will Reduce Climate Pollution

A second reason I support the Delaware Low Emission Vehicle Program is because it will reduce greenhouse gas emissions. Transportation is the leading source of greenhouse gas emissions in Delaware. More than half of those emissions are from passenger cars and light duty trucks addressed by the Delaware Low Emission Vehicle Program. Adopting the Delaware Low Emission Vehicle Program is a straightforward and effective step to reduce Delaware's contribution to this harmful climate pollution.

Delaware is the lowest lying state. It should be a leader in reducing climate pollution. Climate change can literally put Delaware property underwater, and several communities are already experiencing increased flood risks. Flooded and submerged roads are already more frequent. While some of the most damaging hurricanes of recent years missed the state, there was a lot of luck involved. The severe flooding from Hurricane Ida in 2021 left several Wilmington residents homeless. Delawareans also remember the flooding after Hurricane Irene and Tropical Storm Lee in 2011. While it's not a silver bullet, the Low Emission Vehicle Program is a positive and practical step Delaware can take to reduce climate pollution that makes these damaging storms more common.

In addition to flooding, the build-up of greenhouse gases in the atmosphere is causing other harm. There are wildlife impacts, larger tick populations, harm to shellfish and the shellfish industry, and significant impacts to Defense Department missions and installations.

Low Emission Vehicle Program Will Promote In-State Car Sales

The third reason I support the Delaware Low Emission Vehicle Program is because it will be good for business. It will translate to more car sales in-state. Electric vehicles are very much in demand when they make it to car lots, including both plug-in hybrids and zero-emission vehicles. Their prices are coming down, more models are being added, and major car manufacturers like GM are phasing out non-electric models. States that adopt stronger requirements have an advantage in getting plug-in hybrid and zero-emission cars to dealerships and available to car shoppers who want them. The proportional and early action credit provisions will provide incentives for getting such cars to dealerships right away and give businesses greater flexibility with compliance.

For human health, for the climate, and for commercial opportunity, I urge DNREC to strengthen Delaware's tailpipe emission rules. Specifically, I support Delaware's Amendments to 7 DE Admin. Code 1140, the Delaware Low Emission Vehicle Program. The Delaware Low Emission Vehicle Program is the state's best opportunity to cut harmful tailpipe emissions.

Thank you.

Respectfully,

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