

cc: Shawn Garvin, DNREC
Governor John Carney
Mike Ramone, State Representative
Chris Coons, U.S. Senator
Mark Luszcz, DelDOT

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DNREC
Office of the Secretary

Theresa Newman, Hearing Officer
c/o DNREC Office of the Secretary
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Re.: Public Comments Regarding Delaware EV Mandate

After listening in on the virtual DNREC public hearing regarding the EV mandate for Delaware which is being proposed for the very near future, I have a number of "public comments" related to that article and other miscellaneous thoughts. I was disappointed at "who" was allowed to speak at that meeting because "public" to most of us means the people that live in Delaware who would be most impacted by this "mandate", NOT those who forcing EV's on regular citizens (such as representatives from Tesla, Environmental Groups outside of Delaware, Natural Clear Cars Commission, Al Gore's Group Representative, EV Hybrid Noire based in Atlanta, Mid Atlantic Alliance for Health, and others from similar organizations). I was originally against this "EV Mandate" but after listening to some "logical public comment", my biggest complaint about it is calling it a "mandate". IF you had described it as "The implementation or adoption of ACCII in Delaware" instead of "Delaware EV Mandate", it would have been a lot gentler way of presenting it to the actual "public" of Delaware. I also would have liked it IF all those that registered to speak would have been told to "state their name, what vehicle they currently drive, what state they lived in (since you allowed out-of-staters to call themselves "our public"), and THEN stating why they agreed or disagreed with the proposed directive."

I do agree that, by having Delaware (DNREC) officially "adopt" ACCII, it will invite some EV companies (e.g., Tesla and Rivian) to locate a business here so Delawareans could test drive one plus will facilitate that more EV's will be available from the big car manufacturers (Ford, Chevrolet, Subaru, Toyota, Nissan, etc.) and not have horrendous wait times to purchase one, if desired. Subaru has a Crosstrek Hybrid that was only sold in a few states (I asked because I would was considering buying a hybrid and wanted another Subaru). Now Subaru is discontinuing that hybrid model after 2023 because they had very few sales...no wonder, because it wasn't readily available in every state!

Now my comments:

- > EVERY major car company should have been required to produce all their gas vehicles as ONLY PZEV's long before this "EV mandate" should have been brought up for Delaware. And they should have made their Hybrids more reasonably priced and not so small that many people can't comfortably fit into them.
- > There are genius scientists and engineers that have created rocket ships that can go to outer space and back, and even land so as to fly again, but there isn't anyone smart enough to create a catalytic-type converter (under \$1000) that can dispel ALL bad emissions from gas powered vehicles which could be retrofitted onto any existing gas powered vehicle without costing an arm and a leg??? I cannot believe that rocket ships are more important than "fixing" the emissions from ALL existing gas powered vehicles without "mandating" that only new EV's be available after a particular year!!! Maybe THAT'S where the research funds should be directed??
- > Much of the air pollution in Delaware is caused by diesel-powered tractor-trailer traffic that has increased exponentially (and will continue to do so) due to the numerous new warehouses (Amazon and others) that are being approved for construction throughout Delaware, and particularly in New Castle County. Also, if the approvals that DNREC keeps giving for the transport of various kinds of solid waste by out-of-state companies into, out of, and through Delaware (by trucks that pollute and will never be replaced by EV's) are NOT actually STOPPING and LEAVING their waste in Delaware's landfills, then allowing them to travel "ONLY THROUGH" Delaware on I-95 or Rt. 1, etc. is acceptable, but still polluting our air quality. However, each state should be required to KEEP their own solid waste in their own state IF they aren't already. Our tiny state has enough to deal with on our own.

My Subaru is a PZEV, which supposedly reduces the emissions much more than normal catalytics do and was mandated in California in 1998 before EV's became "a thing" to buy (In 2020 in CA). If Delaware wants to emulate California, then they should be phasing in these regulations first, not EV's in 2-12 years! It took California from 1998 until now to get their air quality to ~67% out of 100% while Delaware right now is supposedly at ~77% without any of those restrictions yet. Why can't Delaware phase in PZEV's and hybrids for many more years before being at such a rush to crack down on Car Manufacturers to sell primarily EV's? Delaware has a large retired population, many of who are living on fixed incomes. (See attached article on PZEV's) PLUS comparing anything Delaware with anything California is ridiculous...except maybe to compare the amount of OPEN space in the state of California to the amount of OPEN space in our small state. And comparing any of this for each state doesn't mean anything if you don't also factor in the average wealth/income of all residents (which should include ANYONE who is filing a tax return...so millionaires, CEO's, minimum wage earners, retirees on fixed incomes, etc., etc.). California's cost of living is very much higher than Delaware's which also figures into whether EV's are affordable or desirable. California's population is 39,000,000+ compared to Delaware's at 1,000,000+. The News Journal article referred to how few registered EV's Delaware has compared to those registered in California. That number quoted means nothing when not taken into context with the percentage of EV's registered in either state compared to the total number of registered cars/SUVs/trucks in each state.

- > California JUST passed a "first in the nation" emission rule for trains. (See attached) It proposes to ban train engines more than 23 years old by 2030 and ban them for idling longer than 30 minutes if they have an automatic shutoff. If the proposed Newport Train Station is approved, that puts more "stopped trains" closer to my house with emissions once again (see later comment regarding the diesel truck situation we had for 10+ years until recently).

The average car loan to purchase an EV costs more per month than many residents can afford to pay or are even able to secure a loan for due to income limitations and already existing mortgage or rent expenses plus the need to pay for food. Giving a federal tax credit of up to \$7500 to those purchasing an EV (most of which are \$40,000+, other than the tiny ones!) doesn't help someone trying to qualify for that huge car loan! Better if the EV manufacturers would lower the cost by the \$7500 even though that would still be outrageous! A car loan for 7 years (84 months) on a \$45,000 car is roughly \$657/month at 6% plus the cost of installing a charging station IF you have a garage or needing to live near a charging station if you don't have a garage.

All the jobs that Delaware is bringing in with the construction of all the warehouses are just over minimum wage and mostly younger employees. Those don't have enough income nor the credit ratings to qualify for a decent rate even if they could afford to purchase an EV at \$600+/month especially if they have to pay taxes, rent, and eat!

The gas stations will lose business and possibly will close, and many will become brownfields (due to prior gas leakage) and car dealers will be letting salespersons go because not enough sales of EV's will keep them afloat, in fact, much of the sales of EV's will likely be done over the internet as many cars are now already sold. Will bringing in the warehouse workers balance out the number of gas station owners/employees and car salespersons that will be out of work? Delaware already has enough closed businesses but construction of new office buildings and housing projects keeps getting approved. Also, where will all the "soon-to-be defunct gas vehicles" go to die??? Will they go to the same place where the "some-day-dead EV batteries" go to die???

- > The current infrastructure of most states currently cannot sustain the advanced use of electricity to charge the number of EV's that ACCII hopes to get on the road (consider what happened in Texas a few years back and, with global warming, that is going to put an increased demand on air conditioning usage in many more states).

And my final observation on this mandate...I am a single elderly female that travels to visit family in other states that would require recharging of an EV during my trip IF I had one. I do not feel comfortable even now going into rest stops at night yet alone into a charging station that requires me to stay there solo while my EV recharges especially if it's 95+ degrees outside and I have to leave my car windows down in order to sit inside my car. Delaware (and I'm sure many other states) has way too many random shootings, car jackings, abductions, and rapes to make me feel comfortable traveling alone in a car that needs to "find" a charging station before it's out of "juice" rather than just stopping at the first gas station I see when I'm down to ¼ or ½ tank.

I am a retired senior on a fixed income. I own a 2017 Subaru Legacy PZEV (that looks brand new) with 49,398 miles on it. I likely will not buy another vehicle in my lifetime nor could I anyway since the payments would be a hardship for me. I have some cash available to use on a new vehicle but not nearly enough to afford an EV and a charging plug in my garage. There are a lot of residents of Delaware just like me and many more that are worse off than I am. This mandate that is endorsed by President Biden and also Governor Carney and soon by DNREC Secretary Shawn Garvin may not be a hardship to each of them. But for the newly employed young high school and college graduates and those retired residents living mostly on Social Security, this EV mandate is going to cause excessive hardships on them.

The EV mandate may not affect me before I die but my children and grandchildren will have to deal with all of this. I just hope that some of what I've put in this letter will make you think about your decisions at least until the price of EV's is reduced to what a normal gas powered vehicle should cost and wages are increased for at least the lowest paid workers. Even the cost of some of the gas powered vehicles these days is way out of the range that many can afford. In 1972, I special ordered a brand new 1972 Dodge Charger through the Dodge Dealer with a 4-speed, a/c, special paint color, and a special vinyl roof for \$4400 (which would have been ~\$83/month at 5% for 5 years), I was making about \$1000/month and still had to pay \$200/month for an apartment. So my car and rent was 3.5% of my salary. Based on those numbers, someone today who has a \$662/month car payment (6% 6 year loan on a \$40,000 car loan) plus average rent of \$1,500-2,000 would have a hard time surviving with a \$20/hour job (~\$3716/month before deductions for taxes, health insurance, 401K, etc.). You can do the math.

- > And lastly, the residents of my neighborhood had to put up with poor air quality from excessive diesel-powered tractor-trailer traffic due to the public notice having a "typo on the street name of where the Highline/Twinco Company was having chemical tanks installed" which happened in January 2013. The residents at that time tried to get something done through local legislators with no success. When I moved to Silview in 2019, I started trying to get some relief for our horrendous air quality and, although DelDot has "promised" that an alternate road should be completed in 2024 to take those trucks out of Silview and Pleasant Hills, the company has now left so we've had peace and quiet since April 1. However, the owner of that property is actively trying to get a new leasee which could be equivalent or even worse than what we had with no urgency by DelDot to get this alternate road before a new leasee is found, and no one seems to care completed (if the alternate route actually does happen). However, the problem with diesel emissions effects on air quality was mentioned in the virtual public hearing as a reason for mandating EV's!

There is no need to contact me about my letter. I just wanted to be sure that you all had taken all these things into consideration. And to sign off....since President Biden has been in office, the Rt. 141 & I-95 shutdowns when he's at home for the weekends often cause hours of backed up idling traffic jams along his entire route and also the Rt. 1 shutdowns when he's traveling about while at his vacation home in Rehoboth do the same thing especially in the summer.

Respectfully submitted,



Anne Y. Koiv

Attachments:

- PZEV article from Car and Driver
- Quick Guide to PZEV's
- News Journal Article on California emissions rule for trains
- Cost of new and used EV's
- NCC proposes amending code that governs warehouse development