

Subject: Public Hearing Comments

Date: Wednesday, May 24, 2023 at 3:06:20 PM Eastern Daylight Time

From: DoNotReply@delaware.gov

To: HearingComments, DNREC (MailBox Resources), bill3@dohertyfh.com

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

Name: Bill Doherty

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Organization: Delaware State Funeral Director's Association

Comments:

Members of the Delaware State Funeral Directors Association (DSFDA), STRONGLY OPPOSE the adoption by reference of California's Advance Clean Car II Standards as it would pertain to the Delaware Low Emission Vehicle (LEV) and Advanced Clean Car (ACC) Program as it is outlined in DE Admin Code 1140. These new regulations will be detrimental to local funeral service providers with respect to our members ability to source, purchase, and effectively utilize and maintain, electric powered specialty vehicles such as first-call (decedent transfer) vehicles, hearses, and/or limousines. The Association also fears maintaining an EV fleet of vehicles will lead to greater payroll expenses and wasted personnel hours at charging stations, as well as negatively impacting our members' ability to effectively recover decedents from locations of any significant distance with respect to our establishments in Delaware. This mandate will force local funeral homes, a majority of them being small, family-owned and operated businesses, to absorb and ultimately pass on higher costs to the consumer. The trickle-down effect will erode the public's confidence and trust in our profession and cause irreparable damage to a multitude of multi-generational family businesses that have served their local communities for decades. Simply put: The Association does not feel that the technology or infrastructure is advanced enough to meet the demands of our profession in a cost-effective manner. Thank you for your careful consideration of our opposition.