

**Subject:** Public Hearing Comments

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**From:** DoNotReply@delaware.gov

**To:** HearingComments, DNREC (MailBox Resources), ra\_bell3@yahoo.com

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

Name: Robert Bell

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Organization:

Comments:

I am writing today express my position NO regarding Advance Clean Car II. DNREC is an administrative agency, and have not been authorized by the legislature to interfere in the free-trade and free-travel of its citizens. You are seeking to change and expand regulation that will affect current and future citizens of Delaware in numerous ways, to prevent the purchase of suitable, reasonably-priced vehicles, and vehicles that have the ability to be used in the manner and distance for travel and etc that car-owning citizens have come to rely upon. The fact is that ZEVs are largely electric cars, which prices are currently astronomical, on the order of gasoline-powered luxury class vehicles; they are not attainable for large families (such as mine), or for citizens of more meager means. Further, there are few vehicle options that provide capabilities permitting families to travel and tow according to their interests. The Delaware Legislature has not increased your regulatory authority. There has NOT been robust debate in our legislature, where the people's voice has some semblance for hope to be heard through OUR elected representatives. What authority DNREC -does- have stems from our legislature ceding responsibility, to adopt rules that were created in California, and created by a board that owes no voice to DELAWARE citizens. It goes without saying, of course, but California is much larger and more affluent state than Delaware, so perhaps their due-process works for them. But I am not Californian, and for what its worth I don't live in California for a reason, so requiring me to follow THEIR rules is out-of-line. Regardless, when I heard about the coming ZEV rules, I posed a number of questions to Kyle Krall in December of last year, and have received no response. - I inquired as to the raw data; I would like understand how the determinations were made throughout your workshop/presentations. I was specifically interested in the actual calculations of GHG from transportation correlate to alleged data at the 03 monitor sites. I am particularly concerned that the entire state will suffer from a bias of monitoring in New Castle County, which also is home to the majority of heavy industry producers... how does one square this new rule absent answers to realistic questions? - I inquired what the plans are for DNREC and GSS/the state to replace the entire fleet? If ZEV rules are good enough for the people, it MUST be good enough for the people's employees. - I wanted to know what direction was given to deal with EV batteries; EV batteries are large, numerous, more dangerous than typical batteries. It's imperative to know the plan for when: - EVs -WILL- be involved in accidents, and/or other opportunities for batteries to become unstable - batteries -WILL- need to be replaced; what is the plan to manage that The battery problem needs to be addressed, and I saw no mention of it in the presentations. In my email to Mr Krall, which once again went unanswered, I expressed that I was not averse in theory to cleaner emitting vehicles, but I would hope that there would be a more gradual move, and one that instead state government could lead itself by converting its own fleet first. I think that would persuade manufacturers to bring more and cheaper LEV and ZEV vehicles to market, which would thus make them more affordable for lower-income Delawareans. The plan as DNREC has proposed specifically exempts the heavier duty vehicles; I think doing so is short-sighted, and will leave manufacturers to ignore a critically important segment of municipal and commercial operations. Respectfully, Robert Bell, citizen, Dover DE.