

Subject: Zero-Emission Vehicle Sales Mandate is the Wrong Choice for Delaware

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From: Jim Kenyon

To: HearingComments, DNREC (MailBox Resources), Carney, John (MailBox Resources), Garvin, Shawn M. (DNREC)

DNREC, should NOT be making a decision like Governor Carney has asked you to do concerning his EV mandate. The state legislature should be involved with A LOT MORE input and thought as to what impact a decision like this will do to our economy and way of life.

I am NOT anti-electric car, solar or wind. Currently, they can provide a supplement. What I am against is the narrow 'tunnel vision' that this state has embraced in stating goals that not only are unattainable, but incredibly detrimental to the citizens of Delaware. Any rational businessman would not throw out what works (or fire an employee) without already having a 'viable' replacement in the wings. I use the word 'viable' intentionally because that is exactly what we face right now with electric vehicles, solar and wind. Somewhere in the distant future these three will become more integrated into both energy generation as well as consumer usage, BUT they are nowhere close to being efficient enough now to throw out what works and put all our eggs in such a currently very costly, ineffective and impractical basket.

Many of these points are further explained in an earlier letter to Governor Carney.

The following statement by State Rep. Rich Collins points out a number of flawed suppositions and challenges in the ACCII regulation that will cost Delawareans dearly with no benefit.

As a member of the House Natural Resources & Energy Committee, I offer the following thoughts on why the mandate is bad public policy and call into question the Carney administration's position that the switch to EVs is needed to improve local air quality and fight global warming and climate change.

- While electric vehicles (EVs) do not have tailpipes, they use electricity from plants producing emissions and hazardous waste. The vast majority of EVs are charged from the power grid. According to the U.S. Energy Information Administration, more than 60% of the nation's electricity is produced using fossil fuels. Another 18% is generated with nuclear energy. While being zero-emission, nuclear reactors produce highly radioactive waste for which the nation has no long-term storage solutions.
- Gov. John Carney, who directed DNREC to start the process of promulgating the EV mandate regulations, concedes that most of the state's air pollution is not produced by Delawareans. Writing in a June 2018 opinion column the governor stated that "90% of Delaware's air pollution comes from other states." The column lamented that out-of-state power plants, south and west of Delaware, were not using pollution control equipment to reduce their emissions.
- DNREC maintains it must force the adoption of EVs because of the impact of Delaware's pollution on the downwind Philadelphia Metro Area. But according to Philadelphia's Air Quality Report 2021, "general trends show many air pollutants in Philadelphia to be decreasing. In 2021, Philadelphia attained the NAAQS for all pollutants, except for ozone." In fact, a review of the Philadelphia Annual AQI shows a steady, dramatic improvement over the last four decades, without EVs making any significant contribution. In 1981, 159 "unhealthy" days (the fourth worst category on a scale of six) were recorded. That number dropped to 53 days in 2001 and to just 6 days in 2019 (pre-pandemic). The number of "good" days

(the best category) recorded jumped from 18 in 1981, to 98 in 2001, to 244 in 2019.

- According to [federal data](#), there were 1.31 billion light-duty vehicles (LDVs) in the world in 2020. Delaware's 967,400 cars, trucks, and SUVs (2021) constitute less than eight one-hundredths of one percent of all light-duty vehicles on the planet. Even if Delaware were to entirely ban the operation of all Delaware cars, trucks, and SUVs tomorrow, there would be no appreciable difference in worldwide CO2 emissions, or any other pollutant linked to global warming or climate change. While we all have an obligation to be good stewards of the environment, the Carney administration's policy of forcing the adoption of EVs will carry huge costs for taxpayers and impose hardships on Delaware families for what amounts to global virtue-signaling.
- While Delawareans are being asked to surrender their freedom of choice and make huge personal and taxpayer-funded financial investments to embrace EVs and reduce global carbon emissions, China is doubling down on the use of carbon-rich coal. [From the Yale Environment 360 \(a publication of the Yale School of the Environment\) "Despite Pledges to Cut Emissions, China Goes on a Coal Spree": Coal remains at the heart of China's flourishing economy. In 2019, 58 percent of the country's total energy consumption came from coal, which helps explain why China accounts for 28 percent of all global CO2 emissions. And China continues to build coal-fired power plants at a rate that outpaces the rest of the world combined."](#)
- As is the case in Delaware, less than 1% of the nation's vehicles are EVs. As of the end of 2021, there were [967,400 vehicles registered in Delaware](#), of which [3,010 were EVs](#) (0.31%).
- While proponents of the EV mandate claim that used fuel-powered vehicles will still be available for sale and use, there is reason to question this. California's Advanced Clean Car II regulations are a major part of the broader ["2022 Scoping Plan for Achieving Carbon Neutrality"](#) that was released last November. The plan envisions reducing demand for liquid petroleum by 94% by 2045 (relative to 2022). The only way to achieve these goals is to take aggressive steps to eliminate the use of fuel-powered vehicles.
- The supply of affordable used fuel-powered vehicles is likely to be constricted because of higher emissions standards placed on these vehicles under the [Advanced Clean Car II regulations](#). Additionally, the EV sales mandates will drive up the cost of pre-owned internal combustion engine vehicles as their availability dwindles.
- According to an [analysis published by MIT Science Policy Review](#), the lack of home charging options for EV owners living in urban areas, apartments, and condos presents a troubling inequity. The questions of how home charging can function in a city environment with on-street parking, and what level of government involvement and spending will be required to deal with this issue, are unquantified and unresolved.

These points highlight just some of the flawed suppositions and challenges connected to Delaware's head-long rush into a poorly considered policy. The governor and DNREC Secretary Shawn Garvin should withdraw the proposed ACCII regulations before they make a costly mistake that all Delawareans will pay for.

In a letter delivered to DNREC Secretary Shawn Garvin, Rep. Ramone and Sen. Hocker noted that all Delaware counties are currently “in attainment of all National Ambient Air Quality Standards as set by the EPA.” They said the state is considered out of compliance only because DNREC has failed to petition the EPA with the updated data.

I urge you to act according to the constitution and not go beyond the bounds of your authority.

Sincerely, Jim Kenyon
Harbeson, Delaware