

Subject: Public Hearing Comments

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From: DoNotReply@delaware.gov

To: HearingComments, DNREC (MailBox Resources)

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

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Organization: no

Comments:

I oppose the Advanced Clean Car II regulation DNREC has proposed for the following reasons: • 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. I side the governor and urge DNREC to improve Delaware's air quality by taking action against the out-of-state bad actors responsible for it. • 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. • 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%). It is unclear how the very aggressive ZEV sales mandates contained in the proposed regulations can be achieved and enforced. • 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. The ACCII regulations are poorly considered policy that should be abandoned, with Delaware instead following the emission guidelines set forth by the U.S. EPA.