

May 23, 2023

SENT VIA E-MAIL ONLY: DNRECHearingComments@delaware.gov

Theresa Newman, Hearing Officer
DNREC – Office of the Secretary
89 Kings Highway
Dover DE 19901

RE: Proposed Regulation 1140 Delaware Advanced Clean Car Program

Dear Ms. Newman,

Thank you for the opportunity to submit written comments in response to the Proposed Regulations r/t the Advanced Clean Car Program.

These comments are submitted on behalf of the Horse Racing Industry and show horse owners/operators. Horse racing (in all forms) in Delaware is a significant part of Delaware's agri-business industry that provides thousands of jobs and generates substantial revenue for the State's economy annually.

Horse owners and operators support all reasonable measures to improve air quality but opposes the adoption of the CA Advanced Clean Car Regulations because they mandate the use of electric vehicle technology that is totally incapable of meeting the transportation needs of both the horse-racing and horse showing industries. Harness and show horses are trained and maintained at farms across the State and transported to and from the racetracks on the days that they compete. I have been involved in the harness racing industry in Delaware for over 25 years. In addition, as a proprietor of a show horse training facility, I am personally familiar with the towing demands associated with a loaded horse trailer. The weight of the horses, harness, equipment, race sulkies, and factors such as wind and terrain diminish the range for electric pick-ups pulling loaded horse trailers to the point that they are wholly inadequate.

In recent tests comparing the real world towing capacity of electric and traditional pick-up trucks, results have been disappointing for the EVs with batteries depleting more rapidly than expected and ranges being diminished by 2/3 when towing camping trailers.¹ Some estimates indicate an electric pick-up would only be able to tow the weight of a loaded horse trailer 35 – 40 miles on a single charge and then require 30 – 40 minutes at a Level 3 fast charging station for a meaningful partial charge. This would mean that many Delaware horsemen could not make a one-way trip to the racetrack on a single charge, nor could they make a one-way trip to New Bolton Center in Kennett Square, PA where injured or sick horses are taken for specialized care.

This isn't a mere inconvenience for horsemen, it poses a threat to the performance of their horses, and thus, the ability to earn a living, and could in many instances put the horse and truck driver in danger. This type of arrangement also poses a significant health and safety threat to horses and could easily be termed inhumane. Leaving horses on a stationary trailer during a 30 - 40 minute charging session on the way to the racetrack is highly inadvisable. In the summer, it can lead to

overheating, heat stroke, and at any time of year horses can become agitated and hurt themselves or hurt other horses in a parked trailer. For these reasons, prolonged stops are always avoided.

Additionally, it has been noted that current public charging stations are configured as single parking stalls to accommodate cars, but few are set up for pull-through access to accommodate the length of a truck and trailer, leaving the trailer partially in the roadway. Safety concerns with leaving a loaded trailer in the right of way are obvious. While EVs may provide adequate transportation for urban commuting and leisurely trips, when it comes to towing trailers, the technology is insufficient to warrant restricting the sale of pick-ups in Delaware to electric vehicles only. Thank you for your consideration of these comments.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Beth Steele". The signature is written in a cursive, somewhat stylized font. Below the signature is a horizontal line.

Beth Steele

¹ Sokol, M. (2022, Aug. 5). RVelectricity: Is towing a camper trailer with an EV truck practical? <https://www.rvtravel.com/rv-electricity-towing-camper-trailer-with-ev-truck-practical-rvt-1064/>