



P.O. Box 9997, Newark, DE 19714
302-455-VETS (8387)
info@devma.org
devma.org

May 25, 2023

SENT VIA EMAIL ONLY: DNRECHearingComments@delaware.gov

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

**RE: Comments in Opposition to Proposed Regulation 1140
Delaware Advanced Clean Car Program**

Dear Ms. Newman:

Thank you for the opportunity to provide comment regarding the Delaware Advanced Clean Car program.

The Delaware Veterinary community is comprised of practitioners encompassing a wide range of medical facets. While many practitioners in our state work out of brick-and-mortar offices, there are numerous veterinary medical professionals that provide mobile medical services. Some practitioners tend to our our small companion animals in a home setting, providing necessary services to the elderly and those residents that may have difficulty traveling to a veterinary office. Delaware veterinarians providing care to equine and farm animals in our state practice on site, traveling to multiple farms on any given day. Additionally, several practitioners travel between hospitals to provide specialty or emergency services to multiple locations.

Our diverse veterinary community is highly dependent on reliable means of transportation to service the health care needs of the animals in Delaware. While we appreciate the effort to convert to electric vehicles and reduce the carbon footprint, we oppose the regulations currently proposed. The veterinary community opposes the adoption of the CA Advanced Clean Car Regulations because they mandate the use of technology that lacks the full capability and dependability to meet the transportation needs of veterinary providers.

Often large animal providers are called out to farm calls in the middle of the night to assist with birthing, address an injury, or evaluate a down animal. If their vehicle is drained from a full day traveling between farms, they may not have the ability to transport the necessary equipment in a timely fashion to provide adequate care to an animal in need. Veterinarians that provide mobile services will be limited in the number of house or farm calls they can complete in a day due to the necessity to charge their vehicle in the middle of the day. This will be exacerbated in times

of temperature extremes, which is also when animals tend to suffer from weather related issues such as heat stroke or hypothermia. This will provide yet another barrier to appropriate medical care in a state that is already suffering veterinary shortages.

The mandatory transition to electric vehicles has a significant potential to increase the cost of services for veterinary medical care. The veterinary industry will potentially face less productive workdays, higher costs of goods and services from our product suppliers, and challenges in finding accessible charging stations. These increased financial burdens to veterinarians will ultimately be passed on to the pet owning population. In an industry where health insurance is not as commonplace as in the human healthcare market, this will likely result in an increasing number of Delaware pet owners being unable to afford the cost of basic health care for their pets.

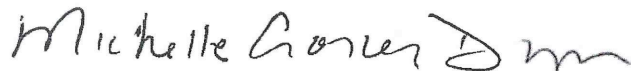
The veterinary community appreciates the State's efforts to be a proactive participant in climate awareness and the shift toward alternate energy sources. We do however believe that it is not practical for the veterinary community. Maintaining the ability to utilize a variety of energy sources to fuel our vehicles will help to prevent undue cost increases and financial burdens to Delaware consumers.

We appreciate your consideration regarding this matter.

Respectfully submitted,



Jeffery E. Bowersox, DVM, DACVO
President, Delaware Veterinary Medical Association



Michelle Crosier, DVM
Chair, Government Relations Committee, Delaware Veterinary
Medical Association