



May 26, 2023

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

RE: Docket #2022-R-A-0011, 7 DE Admin. Code 1140 – Delaware’s Low Emission Vehicle Program

The Delaware Low Emission Vehicle Program should not be implemented as proposed until several studies and steps are taken by the state to assure a reasonable transition to low emission vehicles can be proven. We suggest there is a need for a review of the state’s electrical grid capacity and what upgrades need to be put in place, and this should be shared with the public. Charging infrastructure must be planned, and implementation costs should be shared with consumers. The state should propose a road funding program that encompasses fuel taxes that include Zero Emission Vehicles (ZEVs) and make it available for public review. Consumers should know on a continual basis the cost differential for the proposed transition to ZEVs from Internal Combustion Engine (ICE) vehicles.

**GROWMARK FS** is a subsidiary of the third largest agricultural retailer (GROWMARK, Inc.) in the United States and provides retail sales of seed, plant nutrients, lime, crop protection materials, custom application, turf, propane, fuel, and precision agriculture to customers in the Mid-Atlantic region of the United States (New York, Pennsylvania, New Jersey, Delaware, Maryland, and Virginia). We are headquartered in Milford, Delaware, and operate over forty full service agricultural retail locations.

We are very concerned that the citizens of Delaware will be put at a significant disadvantage in operating their businesses and households with the timeline proposed in the Low Emission Vehicle Program. Reducing emissions is everyone’s goal, and it must be done on a timeline that makes economic sense for compliance. Goals without realistic economic and technology baselines are unlikely to be achieved.

Agriculture uses heavy duty equipment and light duty trucks to conduct its operations. Farmers use trucks to take products to market, bring supplies to their fields, and move livestock. While emerging ZEV technology may be showing some promise, the expense of moving to electric heavy-duty vehicles can force consolidation of farm operations to increase the economy of scale for coping with increased fixed costs. Because the market dictates the price that farmers get for their products, they will not be able to pass costs on like other businesses will. Furthermore, farmers are themselves consumers, meaning the inputs they rely on will also be more expensive because of this transition.

Supply chain durability is critical to all consumers. Most supply chains rely on heavy duty trucks to move products to where they are needed. The timeline proposed by the Low Emission Vehicle Program will bring increased costs to farmers, consumers, and state government, and everyone needs to know those costs and how the state plans to deal with them. The studies suggested in our opening paragraph will provide needed information to Delaware to position the state for the best outcome.



We recommend the proposed Delaware Low Emission Vehicle Program not be implemented as proposed until the suggested studies and steps are taken by the state to assure a reasonable economic transition to low emission vehicles can be proven.

Sincerely,

A handwritten signature in black ink, appearing to read 'John A. Richman', written in a cursive style.

John A. Richman  
Retail Division Manager  
GROWMARK FS, LLC