

Sir:

You have directed DNREC to implement the Advanced Clean Car II standards, based specifically on California's laws. I have several concerns about this proposal:

1. How will the power to charge these electric vehicles be generated? Keep in mind that 86% of Delaware's electricity is generated by natural gas (a fossil fuel), and that 1% of generating plants account for 40% of CO2 emissions.
2. Is Delaware's infrastructure capable of handling the increased load? Are the transmission lines secure? (Power outages are wide-spread after any major storm).
3. Does Delaware's Constitution allow for bypassing the Legislature? I think not. Yet adopting these standards gives them the force of law, without benefit of the legislative process.
4. Finally, the cost. Not just the initial outlay for the vehicle and the charging station. The long-term costs to the individual: increased electric costs at home; increased taxation, likely from property tax increases (to meet the shortfall of decreased gasoline tax revenue). Statewide and federal tax increases to repair, replace and enhance an already-overwhelmed electric transmission system (powered by natural gas, a fossil fuel the mandate purports to eliminate).

I've come full circle. The proposed ACC II "standards" are a costly, counter-productive, unconstitutional mandate. There may be no immediate requirement that everyone purchase a zero-emission vehicle, but this proposal provides ample groundwork for a future regulation. If you must proceed, please put the proposal up for a referendum. At least make it legal.