

ZEV Adoption

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To: Krall, Kyle (DNREC) <Kyle.Krall@delaware.gov>

Cc: Mihok Thomas <tmihok@winnerauto.com>; Shuey Patrick <Pshuey@winnerauto.com>

Dear Kyle,

Thank you for taking comments related to ZEV adoption. A few thought and forgive me if I do not have all my facts straight.

Currently, Delaware commerce is suffering under the non ZEV status as I see it. Manufacturers can produce a limited number of battery electric vehicles (BEV's) and they prioritize ZEV states to meet the various state requirements to do business in those states. Once those quotas are met, they have limited BEV inventory to allocate to Delaware dealers.

Some manufacturers see that they cannot abandon non ZEV states and allocate BEV's equally by market to each state and pay the inevitable fine to ZEV states since they cannot hit both the ZEV quotas and distribute the BEV's fairly across all states. However, many manufacturers (both Ford and Hyundai) in my case, leave Delaware behind and prioritize ZEV states. The result is a large selection of BEV vehicles for sale in both New Jersey and Maryland and nearly none in Delaware as is the case with Ford Mustang Mach E and F150 Lightning and Hyundai Ioniq. Delaware consumers simply go to New Jersey and Maryland to buy those cars.

But please consider carefully the direction of banning the sale of internal combustion engine vehicles (ICE) by 2035. If this occurs absent a federal mandate, there will simply not be enough BEV's to support vehicle demand in Delaware due to manufacturer production constraints and Delaware consumers will drive to spend their money in other states on ICE cars if none are available in Delaware by law.

If these decisions are being made simply on the basis of environmental impact with no consideration for consumer choice in Delaware I would also ask that you open your mind to the issues with BEV regarding the environment that do not get traction because the subjects aren't interesting at this time; environmental damage done mining battery components, environmental damage of disposing of end of life batteries, source of electricity for consumer BEV's (most will plug in to an electrical grid powered by carbon fuels).

Lastly, I ask you dive deeper into the ability for the state to support a full BEV mandate. California has issued guidance this summer to prevent BEV owners from charging. Switzerland is limiting the use of BEV's during the energy crisis created by the invasion of Ukraine. There are broad issues to consider beyond air quality.

All the best. I know this is a difficult path. In the short term, I support Delaware becoming a ZEV state and do not support a BEV only mandate for 2035.

