Banning Gasoline Powered Vehicles

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

Re: Delaware's Low Emission Vehicle 7 DE ADMIN. CODE 1140 - Proposed amendments for Advance Clean Car II

I am opposed to the state of Delaware adopting California ZEV standards (or any California standards) on the citizens of Delaware. We should be complying with whatever the national standards and regulations are.

I live in Sussex County and it would appear that the majority of the problem (if there is any) is in New Castle county and is related to oil refining and power generations, NOT passenger vehicles.

In review of your public presentation I have the following comments / questions. If you can answer any of them, it would be appreciated.

- Why do we need to go to ZEV (Zero Emission Vehicle) in Sussex County when it looks like Sussex county has had ZERO O3 emissions for the last several years? ... See page 10.
- Sussex County is NOT in a Non-Attainment area that means we have met the goals. ... See page 12. Put the electric burden on New Castle County if you must.!
- Page 8 says that transportation contributes 75% of NOx that when combined with VOC's creates Ozone. How bad is Ozone? I thought that the ozone layer was a good thing. A couple of decades ago we had a hole in the Ozone layer and that was bad. You can't have it both ways.
- The chart on page 13 is interesting.
 - Passenger cars are only about 15% of the GHG (GreenHouse Gas) problem (mostly CO2 I think). Why pick on cars?
 - Petroleum Refining is over 20% of the problem. Why not fix that? All of it in New Castle County!
 - Electricity generation accounts for about 25%. Why not fix that? Also, if we get 12% of our electricity from "Imports", how does that generate ANY CO2? Seems to me that the importers should be accountable for that.
 - I get the concept that if the use of electric cars goes up, GHG from cars and petroleum refining go down, BUT, the emissions from electricity generation would go up! Are we just trading one problem for another? Why put the burden on every citizen through higher auto costs and higher taxes? Why not put the burden on the industry to reduce or eliminate emissions?
- Some of the rules for compliance include PHEV's. I looked at the Wrangler 4xe PHEV. You can only go 21 miles on all electric (less than my scooter) and the rest of the time you are running a 4 cylinder gas engine that gets maybe 25 mpg. How does that qualify as a ZEV?
- I really think we should be driving the conversion to electric vehicles through the market economy. I believe that folks will gladly convert to electric when they become cheaper to own and operate than the equivalent gas powered car. Today the economics do not make sense. All the analysis I have seen indicates that they might only be cheaper if you skew the analysis with rebates and high gas prices (gas is now back down below \$3).

And a couple more questions:

- Can I go out of state if I choose to buy a gasoline powered vehicle? Is there an extra tax for that?
- Why should I the taxpayer provide rebates to folks who choose to buy an EV?

Thanks for listening, and I would encourage you to drop the California ZEV plan and allow the market economy and consumers to dictate what vehicles can be purchased in our state.

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