

Delaware Standardbred Owners Association, Inc.

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December 26, 2022

SENT VIA EMAIL ONLY: kyle.krall@delaware.gov

Kyle Krall
Division of Air Quality
100 West Water Street
Suite 6A
Dover, DE 19904

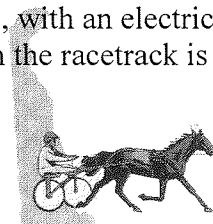
RE: Comments on (DRAFT) Proposed Regulation 1140 Delaware Advanced Clean Car Program

Dear Mr. Krall,

Thank you for the opportunity to attend the public workshop held on December 15, 2022, to present oral testimony, and to provide comments regarding the Draft Proposed Regulations r/t the Advanced Clean Car Program.

These comments are submitted on behalf of the Delaware Standardbred Owners Association (“DSOA”), a trade association of hundreds of Standardbred race horse owners, trainers, drivers, and grooms who make their livelihood racing horses in Delaware. Horseracing in Delaware is a significant part of Delaware’s agribusiness industry with a demonstrated economic benefit to the State of nearly \$200M annually, quantified in a study conducted by University of Delaware Economists and set forth in a report published by the Delaware Department of Agriculture.¹

While the DSOA supports clean air efforts, it opposes the adoption of the CA Advanced Clean Car Regulations because they mandate the use of technology that is incapable of meeting the transportation needs of the horse racing industry. Towing a loaded horse trailer, approximately 10,000 lbs., with an electric pick up for the distances that are required to transport horses to and from the racetrack is unworkable at this point and frankly, dangerous.



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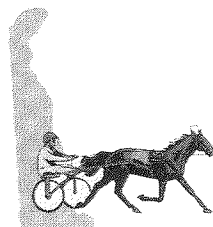
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In a recent test last summer to determine the towing capacity of Ford's most capable electric truck, the towing range was rated "dismal."ⁱⁱ To put it in perspective, the authors of the test explained that using the largest available battery pack, "a fully charged 2022 Ford F-150 Lightning electric truck has less energy onboard than a regular F-150 with four (4) gallons of gas."ⁱⁱⁱ In other words, the electric truck will provide about 35 – 40 miles of towing range when fully loaded with trailer, horses, and equipment.

This is completely unworkable for transporting racehorses. The nature of the Standardbred harness horse industry is that horses are maintained on farms throughout the state and trailered to racetrack destinations and back to their home farm on the same day as a race. Many horses will have more than a 35-mile trip one way to the racetrack, meaning that a round trip on one charge would be impossible and even a one-way trip would be questionable. For instances where racehorses need to travel out of state to compete, the repeated charging requirements would make the trip impossible.

Even for instate racing, the logistics are currently insurmountable. Horses are not permitted to stay on the racetrack grounds unaccompanied, thus the vehicle driver cannot leave the grounds and re-charge the truck while the horse is at the track. The only choice is to charge the truck on the road while hooked to a fully loaded trailer – that's assuming you can find a charging station that accommodates the length of a truck and trailer. In various tests, it was noted that the charging stations at this time accommodate cars but leave a trailer sticking out in the roadway. Not only does this pose a danger of causing an accident with another vehicle, but horses can become highly agitated loaded in a trailer that's standing still and hurt themselves. They are highly tuned athletes whose performance can be altered with the smallest of injuries so it's important to take all necessary steps to avoid injury and keep them competitive.



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Of note, horse racing is not a hobby; it's an industry providing the sole source of income for thousands of Delawareans. The CA standards are too stringent in a small state like Delaware and will pose insurmountable obstacles and economic harm to this important industry, which by the way, keeps thousands of acres open and undeveloped. The DSOA supports the adoption of the Federal emission standards but opposes the Draft Proposed 7 DE Regulation 1140.

Sincerely,

A handwritten signature in black ink that reads "Salvatore DiMario". The signature is fluid and cursive, with a long horizontal stroke at the end.

Salvatore DiMario
DSOA Executive Director

cc: Rebecca Kidner, Esq.

ⁱ*Economic Contributions of the Horse Racing Industry in Delaware to the State: 2014* by CABER (Center for Applied Business & Economic Research).

ⁱⁱ Tingwall, E. (2022, Jul. 31). *Tow No! The Ford F-150 Lightning Struggled in Our Towing Test.* <https://www.motortrend.com/reviews/ford-f150-lightning-electric-truck-towing-test/>

ⁱⁱⁱ Id.