

November 16, 2022

DNREC
Division of Air Quality
100 West Water St., Suite 6A
Dover, DE 19904
Emailed to: kyle.krall@delaware.gov

Re: Low Emission Vehicle Program: Proposed Amendments for Advance Clean Car II

Hi,

My name is Audrey Lyke. I live in Wilmington. I am commenting to support Delaware's adoption of Advance Clean Car ii regulations and zero-emission vehicle targets. In my view it will be good for the climate, good for human health, and good for business.

Climate change is already impacting our state. I am lucky to not have personally experienced flooding from stronger storms, but as Delaware is the lowest lying state, numerous communities are at risk. Flooded and submerged roads are already more frequent throughout the state. The severe flooding from Hurricane Ida in 2021 left several Wilmington residents homeless, and Ida may have only been a preview.

In addition to flooding, the build-up of greenhouse gases in the atmosphere is causing other harm. There are wildlife impacts, larger tick populations, harm to shellfish and the shellfish industry, and significant impacts to Defense Department missions and installations.

Transportation is the leading source of greenhouse gas emissions in Delaware. More than half of those emissions are from passenger cars and light duty trucks addressed by ACC ii. Adopting ACC ii is a straightforward and effective step to reduce Delaware's contribution to this harmful climate pollution.

The ACC ii standards, and the ZEV requirements, will also reduce tailpipe pollutants that harm human health more directly. Traffic-related air pollution aggravates asthma and acute respiratory illness, especially in the most vulnerable populations. An asthma attack can be a terrifying experience.

Cutting tailpipe emissions would reduce the incidence of asthma attacks, hospital and emergency room visits, and school and workdays lost to respiratory illness. In the age of COVID-19, RSV, and other assaults on our lungs, it is doubly important to act.

On a commercial note, ACC ii and ZEV requirements will translate to more car sales in-state. Electric vehicles are a hot item when they make it to car lots, including both plug-in hybrids and zero-emission vehicles. Demand for them is growing. States that adopt stronger requirements have an advantage in

getting these cars to dealerships and available to car shoppers who might otherwise cross state lines to find what they want.

For the climate, for human health, and for commercial opportunity, I urge DNREC to continue the process to strengthen tailpipe emission rules. Specifically, I support Delaware's adoption by reference of California's Advance Clean Car ii standards, and the addition of the requirements for zero emitting vehicles for model years 2027 and beyond. ACC ii and the ZEV requirements are the state's best opportunity to cut harmful tailpipe emissions.

Thank you.

Respectfully,

Audrey J. Lyke

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