

DE Sierra Club  
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**Delaware Chapter of the Sierra Club**

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September 23, 2013

Secretary Collin O'Mara  
DNREC  
Office of the Secretary  
89 Kings Highway  
Dover, DE 19901

Mr. Ali Mirzakhilili  
DNREC  
Air Quality Management Section  
715 Grantham Lane  
New Castle, Delaware 19720

Re: Delaware Advanced Clean Cars Program

Dear Secretary O'Mara and Mr. Mirzakhilili,

On behalf of the Delaware Chapter of the Sierra Club and our over 1,400 members in the state of Delaware, I applaud the Department of Natural Resources and Environmental Control for its efforts to reduce health-threatening pollution from our cars and trucks. We strongly support the Division of Air Quality's efforts to reduce smog-forming pollution from motor vehicles and urge you to build on these efforts by advancing policies that will speed the adoption of zero emission vehicles within Delaware. Specifically, the Delaware Sierra Club urges the Department to do the following:

**Adopt low emission vehicle standards as soon as possible.**

Motor vehicles remain the leading source of smog-forming pollution in Delaware, contributing to health-threatening high ozone days. In a recent report, the American Lung Association awarded air quality in Delaware's three counties two F's (New Castle and Sussex) and one D (Kent) due to the frequency of high ozone days. The proposed standards will reduce smog-forming pollution from our passenger cars and trucks by 75%, preventing premature death, reducing asthma attacks and giving Delawareans cleaner air to breathe.

**Engage the public when designing incentive programs for electric vehicles and other zero emission vehicles.**

In a meeting held July 31, the DNREC Division of Air Quality informed stakeholders that an incentive program was being developed to drive the adoption of vehicles that emit little or no tailpipe pollution and that this program was being established by the DNREC Division of Climate and Energy. While this is a laudable goal, the program must be designed in a way that does not detract from other efforts to clean Delaware's environment and that supports communities facing the worst effects of pollution. DNREC should move forward in designing this program.

It is absolutely critical that the Department engage stakeholders and the public in designing this incentive program. We recommend that the Division of Energy and Climate do this by establishing a working group where representatives of the automobile industry, the University of Delaware, state environmental and clean air advocates, the Division of Air Quality and members of the public may have a voice. Because the Division of Air Quality has taken the lead on this issue to date, we feel it is important that their expertise and the relationships of trust that they have established with stakeholders continue through the development of an incentive program for electric vehicles.

**Adopt the Zero Emission Vehicle program.**

While we applaud the Department for proposing to design incentives that will speed the adoption of vehicles that emit little or no tailpipe pollution, this should not be seen as a replacement for adopting the Zero Emission Vehicle program. Delaware must move forward with the process of adopting the Zero Emission Vehicle program as soon as possible, which would set a clear goal for the adoption of plug-in electric vehicles within the state and ensure that Delaware consumers have cleaner choices at the showroom.

Again, we applaud the Department of Natural Resources for moving forward with common sense standards that will reduce health-threatening pollution from our cars and trucks. We urge the Department to adopt these standards as soon as possible, and look forward to working with the administration to advance policies that will increase the adoption of plug-in electric vehicles within Delaware.

Respectfully submitted,

Stephanie Herron  
Sierra Club, Delaware Chapter