



Alliance of Nurses for Healthy Environments

Bringing Science and Passion to the Environmental Health Movement

April 26, 2023

Department of Natural Resources and Environmental Control

RE: Docket #2022-R-A-0011

STEERING COMMITTEE

Azita Amiri, PhD, RN

Laura Anderko, PhD, RN

Adelita Cantu, PhD, RN

Lisa Campbell, DNP, RN, APHN-BC

Anabell Castro Thompson, MSN,
APRN, ANP-C, FAAN, FAANP

Cara Cook, MS, RN, AHN-BC

Kathy Curtis, LPN

Tammy Davis, BS, RN

Karen G. Duderstadt, PhD, RN

Tom Engle, RN

Robyn Gilden, PhD, RN

Anne B. Hulick, JD, MSN, RN

Katie Huffling, RN, MS, CNM, FAAN

Jeanne Leffers, PhD, RN

Ruth McDermott-Levy, PhD, RN

Kathy Murphy, EdD, MSN, RN

Barbara Sattler, RN, DrPH, FAAN

Kathy Simmonds, PhD, MPH,
WHNP-BC

Daniel J. Smith, PhD, RN, CNE

Beth Schenk, PhD, MHI, RN

Lisa M. Thompson, PhD, RN, FNP,
FAAN

Antionella "Shelley" Upshaw, PhD,
BS, RN

Jennifer Wasco, DNP, RN

Mary Jane Williams, PhD, RN

Sandy Worthington, MSN,
WHNP-BC, CNM

My name is Sarah Bucic. Thank you for allowing me the opportunity to provide comments today. I have been a Registered Nurse here in Delaware for over 20 years and today I am representing the Alliance of Nurses for Healthy Environments (ANHE). ANHE is the only national nursing organization focused solely on the intersection of health and the environment. One of our roles as nurses is to create healthy environments in which individuals, families, groups and communities cannot just survive but thrive.¹ Nurses have been ranked the most trusted profession for 20 consecutive years² and we are led by our professional obligations³ which make addressing health, environment and safety a professional focus of ours. It is for this reason that the Alliance of Nurses for Healthy Environments request Delaware's Department of Natural Resources and Environmental Control (DNREC) to amend regulations to update the adoption by reference of California's Advance Clean Car II (ACC II) low emission vehicle and greenhouse gas standards and add the requirements for zero emitting vehicles for model year 2027 and beyond.

DNREC is the EPA's arm in Delaware. EPA sets emissions standards, not electric vehicle (EV) standards or fuel economy standards. DNREC's proposed amended regulations are consistent with the long history of EPA regulating greenhouse gasses under the Clean Air Act. Within Delaware's proximity, Maryland, New Jersey, New York and Virginia have all already committed to adopting advanced clean car II (ACC II) standards.⁴

Greenhouse gas (GHG) emissions from motor vehicles are a major contributor to climate change. The largest source of greenhouse gas emissions in Delaware in 2018 was the transportation sector which

¹ American Nurses Association (2020). *Nursing: Scope and standards of practice, (4th ed.)*. ANA: Silver Spring, MD.

² Yale School of Nursing. (2022, February 7). *Gallup: Nurses are Most Trusted Profession for 20th Straight Year*. <https://nursing.yale.edu/news/gallup-nurses-are-most-trusted-profession-20th-straight-year>

³ American Nurses Association. (2020). *Nursing: Scope and Standards of Practice (4th ed.)*. Standard 18: Environmental Health. ANA: Silver Spring, MD.

⁴ International Council on Clean Transportation (ICCT). (2022, February). *U.S. states with ZEV and clean car standards*. <https://theicct.org/wp-content/uploads/2022/02/clean-car-infographic-feb22.pdf>



Alliance of Nurses for Healthy Environments

Bringing Science and Passion to the Environmental Health Movement

represented 30% of greenhouse gas emissions with passenger cars and heavy-duty vehicles representing the majority of these GHG emissions.⁵

Research shows that reducing air pollution saves lives and promotes healthier lungs in children and that burning fossil fuels through transport vehicles produces dangerous air pollutants that are harmful to human health.⁶ The American Lung Association, in their most recent State of the Air Report, ranked New Castle County with a “D” for ozone.⁷ Vehicle emissions contribute to this ozone formation. Ground-level ozone makes air quality worse.⁸ While Kent and Sussex counties fare better, we know that there are still many people throughout our state who have compromised respiratory statuses and those who remain vulnerable to air pollution and its health effects.

The cost of air pollution in economic and health terms within the U.S. is staggering. In 2014 alone, early deaths from air pollution cost the U.S. economy \$790 billion, roughly 5 percent of its yearly gross domestic product (GDP).⁹ Exposure to particulate matter and ozone are associated with increased risk of cardiovascular and respiratory disease, hospitalizations and emergency room visits, as well as premature death and improvements in air quality are shown to improve respiratory and cardiac health, save lives, and reduce costs associated with these diseases.¹⁰

Pollution from the transportation sector has been a long-standing obstacle to advancing environmental justice, as many communities of color and low-income families live near areas where pollution from vehicles and engines is abundant, and therefore experience disproportionate exposures to this pollution.¹¹ Numerous communities throughout our state live within close proximity to I-95 and Route 1 and communities near the Port of Wilmington have long experienced the health impacts of vehicle pollution.

These proposed standards are not a ban on gasoline cars but rather are a requirement on automakers, not customers. No one is being forced to buy anything under this proposal. Plug-in

⁵ DNREC, Department of Natural Resources and Environmental Control (2021). *Delaware's Greenhouse Gas Inventory 2018*. <https://documents.dnrec.delaware.gov/Air/Documents/2018-DE-GHG-Inventory.pdf>

⁶ Alliance of Nurses for Healthy Environments (ANHE) (2020). *What the science teaches us about common solutions to climate change and family health problems: The ANHE nurses guide: Addressing climate change yields healthy benefits*. <https://envirn.org/commonssolutions/>

⁷ American Lung Association (2023). *State of the Air Report 2023*. <https://www.lung.org/research/sota/city-rankings/states/delaware/new-castle>

⁸ Ibid (reference 5)

⁹ Ibid (reference 5)

¹⁰ Ibid (reference 5)

¹¹ American Lung Association. *Zeroing in on healthy air: A national assessment of health and climate benefits of zero-emission transportation and electricity*. <https://www.lung.org/getmedia/13248145-06f0-4e35-b79b-6dfacfd29a71/zeroing-in-on-healthy-air-report-2022.pdf>



Alliance of Nurses for Healthy Environments

Bringing Science and Passion to the Environmental Health Movement

hybrids, which have gasoline engines, are eligible vehicles under this program and the rule does not affect used vehicles which are the majority of sales nationwide.¹² Gas cars will remain beyond 2050.

Delaware is not being forced to follow all California regulations moving forward as there is no requirement for Delaware to adopt these standards. Instead, Delaware would be acting on the ability under federal law to adopt stronger standards that provide benefits to our state. People could still buy and sell used gas-powered cars, but new ones would no longer be delivered in ACC2 states after 2035 however, we also know that almost every auto manufacturer has already committed to not making and selling any more gas-powered cars after that year.¹³

Please support this health protective safeguard for Delawareans to have the choice to breathe cleaner air.

¹² Davies, E. (2019, October 28) Consumers three times more likely to buy used cars over new. MotorTrader.Com <https://www.motortrader.com/motor-trader-news/automotive-news/majority-buy-consumers-opt-used-new-cars-28-10-2019>

¹³ Delaware Sierra Club Blog by John Irwin. (2022, October 20). *Advanced clean cars II: What is it and why should I care?* <https://www.sierraclub.org/delaware/blog/2022/10/advanced-clean-cars-ii-what-it-and-why-should-i-care>