



May 22, 2023

Secretary Shawn M. Garvin  
Delaware Department of Natural Resources &  
Environmental Control (DNREC)  
100 W. Water Street, Suite 6A  
Dover, DE 19904

RE: Delaware Draft Adoption Advanced Clean Cars II

**The American Lung Association in Delaware strongly supports Delaware’s adoption of the Advanced Clean Cars II (ACC II) rule.** The Lung Association believes that Delaware must continue to enact the most health protective policies that will make meaningful reductions in criteria air pollutants, curb greenhouse gas emissions and ultimately protect the health and well-being of Delawareans.

The American Lung Association is the leading organization working to save lives by improving lung health and preventing lung disease, through research, education and advocacy. The work of the American Lung Association is focused on four strategic imperatives: to defeat lung cancer; to improve the air we breathe; to reduce the burden of lung disease on individuals and their families; and to eliminate tobacco use and tobacco-related diseases.

The American Lung Association’s [2023 “State of the Air”<sup>1</sup>](#) report revealed that one in three Americans — more than 120 million people — live in counties that had unhealthy levels of ozone and/or particle pollution. In Delaware, there were mixed results with New Castle County receiving a D and Kent and Sussex Counties receiving a B and an A respectively. Ozone and particle pollution can harm the health of all Delaware residents and are of particular risk are children, older adults, pregnant people, and those living with chronic diseases – approximately 13,740 children and 79,104 adults are living with asthma in Delaware. Both ozone and particle pollution can cause premature death and other serious health effects such as asthma attacks, cardiovascular damage, and developmental and reproductive harm. While this year’s report noted some progress, the report is a snapshot in time and ongoing progress is not guaranteed. Adoption of ACC II is a critical step in reducing ozone-forming emissions, particle emissions and greenhouse gas emissions to protect the health of Delawareans now and in the future.

Climate change is one of the most urgent threats to human health of the 21<sup>st</sup> century. Reduction of harmful pollutants caused by burning fossil fuels and other combustion is critical to improving the local health today and ensuring a stable climate for future generations. Climate change is first and foremost a public health issue and one that creates disproportionate impacts across Delaware’s diverse communities. Further, climate change is making the job of cleaning our air much more difficult as temperatures rise and drive conditions for unhealthy ozone pollution days, among other health challenges.

The transportation sector is a leading source of harmful air and climate pollutants. The American Lung Association’s [Zeroing In on Healthy Air](#)<sup>2</sup> report issued in 2022, found that a widespread transition to zero-emission vehicles powered by clean energy sources could result in up to 110,000 premature deaths avoided and \$1.2 trillion in public health benefits across the United States over the next 30 years. In Delaware specifically, the report found that transition to clean energy transportation could yield \$5.1 billion in public health benefits including 462 avoided deaths, 11,200 avoided asthma attacks and 55,100 avoided lost workdays. Achieving these public health benefits requires strong policies and investments at the local, state, and national levels to spur the transition to zero-emission vehicles and non-combustion,

electricity generation. The transition to zero-emission technologies — including ACC II — would benefit residents across the United States and in Delaware and especially those most burdened by emissions from power plants and transportation sources.

The ACC II rule represents a crucial step toward healthier air for all Delawareans through strong policies that will reduce further harmful emissions from the combustion vehicle fleet while accelerating the transition to 100 percent zero-emission vehicle sales by 2035.

The Lung Association would also encourage Delaware to consider as a complementary policy adoption of Advance Clean Truck Standard (ACT). The American Lung Association's [Delivering Clean Air](#)<sup>3</sup> report found that heavy-duty trucks deliver major doses of pollution to communities throughout the United States. The transition to zero-emission trucks is a significant opportunity to reduce health impacts and disparities in pollution-burdened communities' home to major truck traffic areas. By moving to zero-emission trucks and power, the public health benefits in U.S. counties with major trucking routes could reach \$735 billion in public health benefits due to cleaner air, 66,800 fewer premature deaths, 1.75 million fewer asthma attacks and 8.5 million fewer lost workdays. Adopting policies to advance zero-emission trucks will reduce regional air pollution impacts, disparities in pollution burdens and emission of greenhouse gases that cause climate change.

The American Lung Association believes that all people are entitled to breathe healthy air and to be free of the adverse health effects of air pollution. We support the protection of all people from the harm of air pollution, especially those who suffer disproportionate exposure from local sources of emissions. We recognize that major sources of air pollution are often located near where many people especially communities of color or lower income, live and work which means their exposure to pollutants emitted can be more immediate and disproportionately harmful.

**The Lung Association strongly supports Delaware's efforts to adopt the Advanced Clean Cars II regulations because they are the most health protective standards available. We encourage Delaware to also consider adoption of Advance Clean Truck Standard as a complementary policy.**

We thank you for the opportunity to provide comments and if you need any additional information, please do not hesitate to contact Aleks Casper, Director of Advocacy at [aleks.casper@lung.org](mailto:aleks.casper@lung.org) or 202-719-2810.

Sincerely,



Deborah P. Brown  
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American Lung Association



Dr. Albert Rizzo  
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American Lung Association

<sup>1</sup> American Lung Association. State of the Air Report, 2023. Available at: <https://www.lung.org/research/sota>

<sup>2</sup> American Lung Association. Zeroing in on Healthy Air, 2022. Available at: <https://www.lung.org/clean-air/electric-vehicle-report#>

<sup>3</sup> American Lung Association. Delivering Clean Air: Health Benefits of Zero-Emission Trucks, 2022. Available at: <https://www.lung.org/getmedia/e1ff935b-a935-4f49-91e5-151f1e643124/zero-emission-truck-report>