



December 1, 2022

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 (ACC2) rule. The Lung Association believes that Delaware must continue to enact policies that will make meaningful reductions in greenhouse gas emissions and ultimately protect the health and well-being of Delaware.

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 [2022 State of the Air](#)¹ report revealed that four in ten Americans, more than 137 million people live in counties that had unhealthy levels of ozone and/or particle pollution. In Delaware there were mixed results. Ozone and particle pollution can harm the health of all Delaware residents and of particular risk are children, older adults, pregnant people, and those living with chronic diseases – approximately 15,250 children and 85,404 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.

Climate change is one of the most urgent threats to human health of the 21st 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 American Lung Association supports measures to reduce all emissions that contribute to climate change. Such measure should include but are not limited to transitioning away from fossil fuels to increased use of clean, non-combustion, renewable energy sources and zero-emission transportation technologies, expanding energy conservation and efficiency measures and establishing enforceable and science-based limits on emissions for all sectors including industrial, energy, commercial, residential and transportation. We support measures to reduce other outdoor air pollutants while reducing emissions that cause climate change.

The transportation sector is the leading source of air and climate pollutants. The American Lung Association recently issued our [Zeroing In on Healthy Air](#)² report which finds that a widespread transition to zero-emission vehicles powered by clean energy sources could result in up to 110,000 avoidable deaths 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 have \$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 would benefit residents across the United States and in Delaware and especially those most burdened by power plants and transportation hubs like highways, ports, and warehouses.

The ACC II rule represents a crucial step toward healthier air for all Delawareans through strong policies to reduce harmful emissions from the combustion vehicle fleet while accelerating the complete transition to zero-emission technologies. As proposed, the ACC II would require cleaner combustion engines and set the trajectory to full 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](#)³ 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 and encourages Delaware to 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 me at aleks.casper@lung.org or 202-719-2810.

Sincerely,



Aleks Casper
Director of Advocacy

¹ American Lung Association. State of the Air Report, 2022. Available at: <https://www.lung.org/research/sota>

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

³ 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>

