



**Statement of Kevin M. Stewart  
Director, Environmental Health, Advocacy and Public Policy  
American Lung Association**

**Before the  
Delaware Department of Natural Resources and Environmental Control  
at its Public Meeting and Listening Session**

**Regarding  
the Proposed Rule of August 31, 2018 of the  
United States Environmental Protection Agency (EPA)**

**Regarding  
Emission Guidelines for Greenhouse Gas Emissions From Existing Electric Utility  
Generating Units; Revisions to Emission Guideline Implementing Regulations;  
Revisions to New Source Review Program**

**Under Federal Docket ID No.  
EPA-HQ-OAR-2017-0355**

**Chase Center on the Riverfront  
Wilmington, Delaware  
October 11, 2018**

Good afternoon.

I am Kevin Stewart and I serve as Director of Environmental Health for Advocacy and Public Policy with the American Lung Association. I'm representing millions of Americans who are at risk from air pollution, but especially today, the more than 100,000 Delawareans who suffer with chronic lung disease. We appreciate the opportunity you have provided for us to present comments, especially in light of EPA's decision to hold only one public hearing on such an important matter.

I was here in January to address this very issue, and I am here to amplify my statement at that time in defense of the Clean Power Plan.

In contrast, the proposed rule before us today is in direct opposition to protecting and improving public health. It is in direct opposition to fighting climate change. It is in

direct opposition to cleaning up the air we breathe. It is in direct opposition to reducing the burden of lung disease. Therefore, the American Lung Association strongly opposes this proposed rule.

The American Lung Association has championed past Federal efforts to set strong air quality and emission standards. Yet the proposed rule refuses to respect the scientific, public health and medical consensus. Ignoring these facts will not make them go away:

- Carbon pollution poses a current and growing threat to the health and safety of Americans now and in future generations. And many communities of color and low income face higher risks.
- Ozone pollution is likely to be worse here in Delaware because of climate change than it would otherwise be.
- Precipitation events and sea level rise mean that Delaware will experience more coastal and inland flooding.

The proposal throws out the Clean Power Plan—current law that should be defended—a regulation with a flexible and effective menu of options that begins to get carbon emissions under control, and achieve other important pollution reductions besides.

But what are we being offered instead?

- No concrete requirements to reduce carbon emissions. States could set no goals at all. Power plants could be exempt from being required to make any changes.
- A permanently weakened New Source Review process based on the illegal and deadly premise that efficiency—and not also total emissions—is the only thing that matters.

The proposed rule is not only weak and toothless. *By design*, it gives power plants a license to pollute. It is actively harmful.

- EPA's own analysis shows that the proposal will cause illness and premature death when compared with existing law. By 2030, *every year*:
  - Up to 1,400 more premature deaths.
  - Up to 120,000 more asthma attacks
  - Hundreds of thousands more days of restricted activity or missed school and work.
- Even more, an analysis from Harvard, Boston and Syracuse Universities found that a policy similar to the one being proposed would actually result in more premature deaths than doing nothing at all.

We testified in July in support of Delaware's Section 126 petitions to better control upwind power plants, yet the proposed rule goes in the opposite direction and clearly threatens to make the air coming into Delaware dirtier than it would already be.

Whether it's the millions affected by wildfire smoke in the West or the millions dealing with the aftermath of catastrophic storms, climate change has impacts on the health and lives of Americans now. It is not an abstract threat looming decades away.

Hurricanes Harvey, Irma, Maria last year, Florence last month, and what's left of Michael—arriving here in a few hours. So many have had the words “historic” attached to them. *Why* should not be a mystery. Evidence is clear that conditions due to climate change have worsened their severity.

Remember Superstorm Sandy? Delaware avoided being hit like New Jersey was, but how long will our luck hold out?

My point is that the collective decisions made around carbon emissions are having real and worsening effects. Delaware poses just one example of our vulnerability. The United States *should be* protecting our nation's health and safety in the long term rather than short-sightedly pandering to the narrow interests of a few. The United States *should be* leading the world in confronting this problem rather than burying its head in the sand.

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