Statement of  
Kevin M. Stewart  
Director of Environmental Health  
American Lung Association in Pennsylvania

Before the  
Pennsylvania Department of Environmental Protection  
at its Public Listening Session  
on  
Clean Air Act Section 111(d) Guidelines  
for the Reduction of Greenhouse Gas Emissions  
from Existing Electric Generating Units  

Rachel Carson State Office Building  
400 Market Street  
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Good afternoon. I thank the panel for your work here today.

I am Kevin Stewart and I serve as Director of Environmental Health for the American Lung Association in Pennsylvania (ALAPA). I represent not only the one-and-a-half million people in the Commonwealth who suffer from chronic lung disease, but also the millions more who desire to breathe clean air and so protect their good health.

For the record:

We support the EPA’s proposal of September 20 to set carbon pollution standards for new power plants. Not only have we urged the EPA to set a final standard within a year, but also to establish similar standards for existing power plants.

There are standards, and properly so, for air toxics, acid gases, heavy metals, and smog-forming and soot-forming emissions from power plants, and there is no excuse for there not to be standards for carbon pollution as well. Anything less shortchanges our health and that of our children.
We therefore also counsel the Department to create flexible, efficient, and economically beneficial regulations that achieve meaningful reductions in greenhouse gases that truly protect public health. However, apart from encouraging the Commonwealth to avail itself of the goals, wisdom, and guiding principles of the member states of the Regional Greenhouse Gas Initiative, we defer to others today to speak at length on the specifics.

Rather, we are here to remind everyone of why we need strong controls on carbon pollution and on air pollution in general:

Carbon pollution will result in higher temperatures that can enhance the conditions for ozone (smog) formation. Even with the steps that are in place to reduce smog, increasing temperatures are likely to increase the risk of unhealthy smog levels in Pennsylvania, and to lengthen the ozone season.

Reducing carbon pollution will combat these effects, and will help protect public health. People at special risk of sickness or even death include infants, children, the elderly, persons with asthma or COPD (chronic obstructive pulmonary disease), those who are immune-compromised, and people in indigent and minority communities.

Moreover, the Lung Association’s concerns are not limited to the direct effects of temperature on smog formation; we also recognize other consequences of increased carbon dioxide levels:

- Increased production of biogenic ozone precursors.
- Increased pollen and mold spore production, exacerbating asthma and allergies.
- Higher temperatures resulting in increased energy production and electricity use—e.g., for air conditioning—and in concomitant emissions.
- An increase in the risk of wildfires and their pollution.
- Vector-borne diseases also show signs of increasing.
- Increased frequency of extreme events such as Superstorm Sandy—which has resulted in mold and health problems in tens of thousands of homes that people experience to this day.

Finally, ALAPA emphasizes that the populations potentially at risk are not a small minority of particularly sensitive persons, but in the Commonwealth are constituted of groups containing hundreds of thousands or even millions of individuals, altogether accounting for about half of the region’s population. They include the following:

- 2.8 million infants, children and teens under 18
- 2 million persons aged 65 and above
- 280,000 children with asthma
- 900,000 adults with asthma
- 670,000 persons with COPD
- 3.5 million persons with cardiovascular disease
- 950,000 persons with diabetes
- 1.7 million persons living in poverty
- Pregnant women and their developing unborn
- Persons who work or exercise outdoors, and many others with existing health problems.

As the Department develops the State Plan to implement Section 111(d), we ask that you consider all of these Pennsylvanians — their needs, their pain and suffering, and the corresponding costs due to absenteeism, lost work and productivity, illness and death.

The American Lung Association’s mission is to save lives by improving lung health and preventing lung disease. We trust that you share that ideal. Let’s get about the business of saving some lives.