

Submitted 8 January 2018 in Wilmington, Delaware.

EPA Docket Center,  
Environmental Protection Agency, Mail Code: 28221T  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Re: Docket ID Number EPA–HQ–OAR–2017–0355,

From: John E. Mateyko  
304 Pilottown Road  
Lewes, DE 19958-1230

Good morning, I am John Mateyko, 304 Pilottown Road Lewes, Delaware, president of Delaware Interfaith Power and Light: A Religious Response to Climate Change, but today I also speak as a architect practicing along coastal Sussex for the last 25 years. Climate is changing Delaware, and what I see deeply alarms me.

I have chaired the Delaware Board of Architects, been a director of the AIA Delaware, chaired its Sustainability Program, and currently chair the national committee of architects reviewing how the profession of architecture in the US will come to grips with the legal obligations of licensure to protect the public health, safety and welfare under the changing climate.

The medical community will document climate change as a dire threat to human health but I want to focus on the roles the design professions—engineers, architects, planners--must play to, as their license mandates, “**protect the public health and safety**” in stopping climate change by completely eliminating—call it, “**getting to zero**”-- the 46% of all GHG that the American Institute of Architects finds generated upstream, downstream operationally, by the built environment. In Delaware, and nationwide we can now make **net zero buildings**--we know how. We must.

Until carbon and other GHG emissions are **quickly slowed, and then stopped completely to net zero**, the climate change impacts of sea level rise on Bethany families, storm surge on Lewes businesses (and my home), extreme heat on Wilmington children,

new vectors of insect-borne disease everywhere, and other awful impacts on our drinking water and food, **will continue to only get worse in Delaware--get worse at an accelerating rate, among other impacts, flooding us.** This is life-threatening. The CPP is our lifeboat to safety.

Since sea level rise and storm surge are already flooding Savannah Road, Pilottown and New Roads of my Lewes, and in Dewey and Bethany and all along the coast of the state with the lowest elevation above sea level, this proposed rule change is **irresponsible, negligent, reckless—like destroying the lifeboat on a sinking ship.**

Way back on June 1, 2015, Philip Cherry, Director of DNREC's Office of Environmental Protection sent a letter to the Delaware Board of Architects' president, then myself, stating, in part, "Delaware is already feeling the impacts of a changing climate...**The public health, safety and welfare will continue to be challenged by the impacts of climate change.**"

Given these same grave risks nationwide, the American Institute of Architects and its counterpart in other design professions have concluded that that **zero emissions** in building design is an **"imperative"—imperative-- for public health and safety, reflecting the scale and urgency required by the science.** **The CPP supports this. Professions support this. The faith community supports this.** The Trump Administration **does not!**

Their proposed rule change is like a **"Dark Ages Rule" trying to roll-back knowledge, science, technology and observed reality** of disasters of increasing frequency and intensity from flooding streets of Delaware, Boston and Miami, to California drought, dying forests and record wildfires; record Houston deluge; Florida, Puerto Rico and Virgin Islands hurricanes the strongest on record, and every year the Lewes tidal gauge creeps higher threatening more homes, and average US annual air temperatures each year is the hottest ever recorded. The federal price tag for inaction from just the last decade of disasters cost \$1.5 trillion dollars.

This is also an attempt to **roll-back the law**. The U.S. Supreme Court has already ruled that carbon pollution—what the CPP stops--under the Clean Air Act is a risk to “public health and safety”. That is the law of the land. Normal regulation reflects it. **This rule change is thus lawless as well as science-less**. It would create legal contradiction with regard to protection of the public health and safety that licensed professions are legally required to uphold under Delaware law.

Professions cannot both follow the dictates of law and science, and this **“make-believe” Dark Ages rule not based on either**. This contradiction renders the proposed rule change arbitrary, capricious.

The rule’s authors apparently inhabit their own **Disney-like Fantasyland, which the rest of us have every right, and some cases, obligation, to reject** --and call out, **as madness**.

To conclude: Under a normal administration, Republican or Democratic, today’s hearing might well have been dedicated to application in Delaware of the Obama era, science-based plan, submitted to the UN under the Paris Climate Agreement advancing the CPP in even a more detailed form, **“The United States Mid-Century Strategy for Deep Decarbonization.”**

Our Delaware, and other states, the professions and faith community, the American people, **“We’re Still In”—and we’re getting to ZERO. as law, science and common sense dictates: Reject this rule change.**

Thank you for conducting this important hearing. ###

John Mateyko, R.A. and president,  
Delaware Interfaith Power and Light: A Religious Response to  
Climate Change  
Lewes, Delaware