Thank you. I’m Rabbi Fred Scherlinder Dobb, Chair of the Coalition on the Environment and Jewish Life; we represent America’s broad spectrum of Jewish denominations and organizations, keeping religious values and sacred texts in dialogue with policy.

The science is clear: Mercury, even infinitesimal amounts, can permanently damage developing brains – life-long learning disabilities, lowered intelligence, neurological disorders, and more. Once in the air, from coal combustion and other sources, it falls into rivers, lakes, and the ocean – where as methylmercury it builds, up the food chain. Pregnant women or young kids eat mercury-tainted fish; life-long brain damage begins.

That’s just one set of cascading impacts, from one toxic substance; lead, cadmium, and (yes, even that “co”-benefit) particulate matter, are also *real* threats. To protect our children, and be enlightened stewards of this good Creation, we need concerted, consistent, strong standards.

That’s why, when MATS (Mercury and Air Toxics Standards) were first (Dec. 2011) finalized, hundreds of faith leaders from varied religious backgrounds celebrated, alongside parents, scientists, health care professionals, and others. These standards have greatly reduced mercury pollution from power plants, nearly 90 percent. Yet every state in the union *still* sees active fresh-water fish consumption advisories. For our children’s sake, if we really value their lives and their minds, we need to do more.

As a dad, and rabbi, I’m disturbed that Administrator Wheeler’s EPA seeks to roll back protections, rather than move them forward. Backwards *is* the proposed direction here (removing the “appropriate and necessary” designation from hazardous air pollution, and explicitly inviting “comment on whether [EPA] has the authority or obligation to remove coal- and oil-fired EGUs from the CAA list of affected source categories and rescind MATS”). Our comment: no—EPA’s obligation is Environmental Protection! Likewise, the Edison Electric Institute, National Rural Electrical Cooperative Association, and American Electric Power Co. object too. No needless invitation to years of litigation; no removal of key health protections.

And, importantly: “*co*-benefits” (reaffirmed by the Bush Administration in 2003) – they’re really just ‘benefits.’ To omit human lives from the equation, as if survival from related but distinct threats is extraneous?!—that’d be inhuman; immoral; and most irreligious. It could be my child, or yours, whose life is on the line, from mercury or something else. “From generation to generation,” *l’dor vador*, our tradition insists. As parents, people of faith, citizens, and human beings, we must protect them.

My colleague, COEJL’s Executive Director Rabbi Daniel Swartz, was on EPA’s Children’s Health Protection Advisory Committee, offering input on [quote] “Environmental Justice, Children’s Environmental Health and Other Distributional Considerations” – Chapter 10, of the 2016 revision of “Guidelines for Preparing Economic Analyses”, of EPA’s “Children’s Health Valuation Guidebook.” Let EPA fully implement its own guidelines for *benefits*, i.e. children’s lives, before reassessing the *cost* side of the equation.

I close quoting Rabbi Swartz, in a recent op-ed: “in May 2011, as I was preparing to testify at the EPA hearings that led to protections Administrator Wheeler is seeking to undo, my normally shy daughter, Alana, then 11, said she wanted to testify with me. On our way home, she said, ‘Dad, we did a good thing today for kids, didn’t we?’ She’s still right. Reducing mercury pollution isn’t anti-business, it’s just a good thing for kids. Join me in fighting to keep these standards intact.”