

Adirondack Council Appalachian Mountain Club Adirondack Mountain Club
Catskill Mountainkeeper Environmental Advocates NY
Protect the Adirondacks! Sierra Club Atlantic Chapter

May 13, 2022

Michael Regan, Administrator
US Environmental Protection Agency – 1101A
1200 Penn Pennsylvania Ave., N.W.
Washington, DC 20460

Re: Please DO NOT shut down North East Air Quality Monitoring

Dear Administrator Regan:

The above organizations wish to express our grave disappointment in your recent decision to stop funding the collection of air quality data from three air-science stations in New York, in addition to stations in Maine, New Hampshire and Vermont. These stations are responsible for monitoring air pollutants from power plant and industrial smokestacks that cause acid rain, soot, smog and climate change.

We believe this decision will have dire consequences for clean air, forests, fisheries and public health across the Northeast. We also believe that the decision runs contrary to the House Interior Appropriations Committee Report and a recent Government Accountability Office report calling for additional funding for air quality data collection, not reduced funding.

We ask that you meet with us to discuss this issue before cutting this funding. We further ask you not to make a final decision that would result in the permanent closure and removal of these vital research stations.

Acid rain from Midwest smokestacks has been a scourge to the forests, lakes and rivers of the Northeast, especially New York's priceless Adirondack Park for most of the 20th Century and beyond. By the 1980s, roughly 25% of the park's 2,800 larger lakes and ponds (10 acres or more) were rendered lifeless by air pollution that poisoned the soil and spread mercury pollution into fish and wildlife – in a region with no heavy industry. The Clean Air Act Amendments of 1990 brought the first federal acid rain control program, and the Cross-State Air Pollution Rule made additional progress.

Those pollution control measures were created because New York and other Northeast states had evidence to show regulators – first, evidence that cuts were needed; then, evidence that the cuts were working. Someday we hope to have evidence that no further cuts are needed because our once-tattered ecosystems have recovered. The one thing needed to collect all of that evidence is an air-quality monitoring network capable of measuring the progress of federally mandated air pollution cuts. We have one now. Please do not dismantle it. Invest in it.

There are currently some signs of recovery from acid rain beginning to emerge in the Adirondacks, where the worst damage in the nation has been documented. Some fish species are more plentiful. Some are losing their mercury contamination. Reduced mercury emissions can help reduce contamination of fish. But progress varies from lake to lake. To cut the funding for air quality monitoring now would leave this potential success story untold. Worse, New York and other states defenseless against all future pollution increases allowed by upwind state-level regulators. Losing the stations would also close the EPA's eyes and ears to violations of federal law.

The 2022-23 House Interior Appropriations Committee Report included the following language, referring to a request for \$5 million in additional annual funding for EPA's air quality monitoring network, which EPA gives out in grants to states that carry out the on-the-ground research:

"Despite continued progress under the Clean Air Act to improve air quality and curb the effects of acid rain, forests and watersheds throughout the Northeast are still experiencing long-term impacts from acid rain, smog, and mercury. To better protect these eco-systems, enhance data collection, and improve long-term monitoring of these threats on the Northwoods Region, the Committee provides increased funding, consistent with the request, within EPM and S&T for the Clean Air Allowance Trading Program to support such efforts. The Committee directs the Agency to provide a briefing on its critical loads approach for climate and acid rain damage documentation not later than 180 days of enactment of this Act. As part of this briefing, the Agency should discuss opportunities to partner with research institutions and scientists in the Region to improve its critical loads approach, to collaborate on water body and ecosystem restoration projects, and to advance acid rain mitigation and monitoring in the Northeast."

We believe this language was clearly seeking enhanced funding and a new EPA emphasis on measuring when "critical loads" of pollution have been exceeded for the sensitive ecosystems it is mandated to protect. To determine this, EPA needs to measure not just what goes up (out of the smokestacks in the Midwest and Appalachian region), but also what comes down (what is measured by the virtual drop-cloth that is the network of air quality monitoring stations across the Northeast).

In addition, the GAO warned Congress in December of 2019 that the nation's air quality monitoring network was becoming antiquated and needed an influx of capital for modern equipment. That modernization has not begun. The decision to close monitoring stations would seem to run counter to that advice. Importantly, sites in New York, New Hampshire, Vermont, and Maine include some that are coupled with some of the longest-running wet deposition sites, and located at high-value research locations such as Hubbard Brook, Huntington Forest, and Underhill, that have supported decades of science and monitoring for multiple institutions and agencies.

During your visit to the Ezra Prentiss public housing complex in Albany last September, some of us had the good fortune to meet with you and Congressman Paul Tonko to celebrate the modest increase in EPA's budget compared to the budgets of the prior administration. We had hoped we had made it clear that the air quality monitoring network should be expanded to better protect public health in urban areas, while continuing to monitor air quality in sensitive natural areas and the vast and ancient forests that help New York remain a leader in carbon sequestration, blunting the impacts of climate change.

We appreciate and applaud what you have done to keep these programs working during your first year or so on the job. We urge you to find a way to prevent these station closures. We request a meeting at your earliest convenience to further explain our position and to seek a way to keep this vital science alive.

Sincerely,

Ramsay Adams, Catskill Mountainkeeper, Executive Director
Michael Barrett, Adirondack Mountain Club, Executive Director
Peter Bauer, Protect the Adirondacks! Executive Director
Roger Downs, Sierra Club Atlantic Chapter, Conservation Director
Peter Iwanowicz, Environmental Advocates NY, Executive Director
William C. Janeway, Adirondack Council, Executive Director
Sarah J. Nelson, Appalachian Mountain Club, Director of Research