



Clean Air Task Force
8 Museum Way
Brunswick, ME 04011

August 25, 2021

The Honorable Tom Carper
Chairman
U.S. Senate Committee on Environment and
Public Works
410 Dirksen Senate Office Building
Washington, D.C. 20510-6175

The Honorable Frank Pallone, Jr.
Chairman
House Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington, D.C. 20515-6115

Re: Clean Air Task Force Support for \$500 million in the Reconciliation Package to Support and Upgrade the Nation's Air Quality Monitoring System

Dear Chairman Carper and Chairman Pallone:

We write today to encourage you to include funding for air quality monitoring in the reconciliation package. A recent report from the Government Accountability Office ("GAO") evaluated the national air quality monitoring system and identified significant challenges in managing the system as well as demands for additional information. While the recent American Rescue Plan provided funding to the Environmental Protection Agency ("EPA") supporting monitoring in communities dealing with the dual threats of COVID-19 and excessive air pollution, we encourage you to take a historic step in the reconciliation package by providing \$500 million in additional funding for long-overdue critical investments across the system, including improvements to infrastructure and equipment, additional personnel, and more robust capabilities.

The air quality monitoring system is critical to tracking progress under the Clean Air Act, including programs that have yielded significant public health benefits, as combined emissions of six key pollutants in the United States declined 78 percent from 1970 to 2020. This system has enabled regulators to identify areas and pollutants of concern, focus resources, and put in place measures to address them. Indeed, "the monitoring system has characteristics of critical infrastructure, including that it is essential in the protection of national public health." GAO report at 9 n.18.

Unfortunately, over the years investments in the system have not kept pace with the demands of public health and welfare, and alarming weaknesses in the system, due in part to old equipment, have been exposed. According to the GAO report, "agencies face challenges with aging infrastructure and the resulting increases in maintenance and operation costs," and officials "said that they had to use monitoring equipment well beyond its design life," in some instances more than twice the amount of time it is generally designed to last. Id. at 28. It is also worth noting that "[o]fficials and representatives [GAO] interviewed from all of the selected state and local agencies and all of the nation's regional air quality associations said that the current funding levels for air monitoring make it a challenge to sustain their monitoring programs and the level of service their networks provide." Id. at 27. With state agencies facing a number of challenges managing the air monitoring system, "federal funding for state and local monitoring programs has declined by nearly 20 percent in real terms over the past 16 years, and state and local funding for these programs has also generally declined." Id. at 25.

In addition to concerns about the condition of existing air quality monitors, investments in new infrastructure to upgrade the system's capabilities are also needed. The GAO report noted that

"[a]ir quality managers, researchers, and the public need additional information so they can better understand and address the health risks from air pollution." Id. at 37. The GAO report identified at least three areas that require additional investment to provide more information to evaluate air pollution health risks: monitoring of local-scale and real-time air quality, air toxics, and persistent and complex pollution. Id.

With regard to the first need for investment in monitoring for local-scale, real-time air quality, the current system is unable to provide adequate information about air pollution hotspots, short-term air quality changes in real-time, and air quality in rural areas.

Investment is also needed in air toxics monitoring equipment to allow a better understanding of the level of risk posed by these pollutants particularly in key locations, in a timely fashion, and at low levels. Locations near potential hotspots, including cancer clusters, environmental justice areas, and industrial facilities lack adequate monitoring. Also, funding for the Office of Research and Development is required to develop methods for monitoring air toxics, as current methods may not be able to detect them at low enough levels to identify public health threats.

The third need is for upgrades to the system to allow the collection of adequate information about pollution precursors, atmospheric chemistry, and transport of pollutants. According to the GAO report, many EPA, state and local officials identified PM2.5 and ozone formation and transport and the effects of wildfires on air quality and public health as areas with specific needs.

Congress must act now in this historic infrastructure package to provide the desperately needed additional funding for EPA and state and local agencies to update, maintain, and expand the air quality monitoring infrastructure. In addition to funding required to purchase equipment, it is important that resources be provided for hiring and retaining staff with the necessary skills to work with modern equipment and data systems, as the GAO report noted that "several state and local agency officials told [the GAO] that personnel costs can be the largest cost within a monitoring program and, as officials from one agency noted, these costs are increasing." Id. at 32. Therefore, we ask that adequate funding be allocated for air quality monitoring, equipment, infrastructure, and personnel to maintain the monitors and collect and interpret the data. Funding for this infrastructure can help to address problems early and encourage investments that will be more beneficial in the long term.

We ask that Congress allocate funding through the reconciliation process to fix problems with the current system, and to develop additional monitoring capabilities to fill gaps and provide the information required to protect public health and the environment from persistent and emerging threats posed by air pollution. We urge you to provide \$500 million in funding to cover expenditures to modernize infrastructure (including purchase of monitors and other equipment), ongoing costs related to running the network (especially adequate staffing), and funding for expansion of the monitoring system to provide additional information beyond baseline requirements (including funding to cover expanding monitoring into communities known to be disproportionately exposed to pollutants due to embedded local sources).

Thank you for your work throughout this process and for considering this request.

Clean Air Task Force

Conrad Schneider

A handwritten signature in black ink that reads "Conrad Schneider". The signature is written in a cursive style with a large, prominent 'C' at the beginning.

Advocacy Director