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*Defending the East's Last Great Wilderness*

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February 28, 2005

Secretary, United States Section  
 International Joint Commission  
 1250 23<sup>rd</sup> Street, N.W., Suite 100  
 Washington, DC 20440

Via Fax and Email

Dear Secretary:

On behalf of the Adirondack Council, I would first like to thank you for the opportunity to provide these comments on the United States/Canada Air Quality Agreement Progress Report 2004. As the Adirondack Council is celebrating its 30<sup>th</sup> anniversary this year, we have spent nearly all of that time addressing the very serious threat of acid rain. In addition, as 80 percent or more of the acid rain-causing emissions that fall in the Adirondack Park originate from outside New York's borders, we are very conscious about the challenges concerning transboundary pollution.

From our perspective, the progress reports are not only useful, but a crucial way to receive feedback on the success of the agreement. We also believe that the agreement has had successes, but much more still remains to be accomplished.

In terms of reductions of the emission levels for sulfur dioxide (SO<sub>2</sub>) and nitrogen oxides (NO<sub>x</sub>), we are pleased with the goals that have been achieved to date. However, we see that there is still much more to be done, as is indicated on page 38 of the report. We have supported the levels of cuts that are proposed in the EPA's Clean Air Interstate Rule (CAIR) and Clear Skies legislation. Both countries should consider taking further action to again reduce their emissions for the well being of both nations.

International Joint Commission  
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The mission of the ADIRONDACK COUNCIL is to ensure the ecological integrity and wild character of the ADIRONDACK PARK.

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The use of continuous emission monitoring systems (CEMS) is crucial to data collection and extrapolation of the information to make policy decisions in the future. We suggest that improvements to both countries' systems be considered and that no erosion of the current U.S. system should be considered.

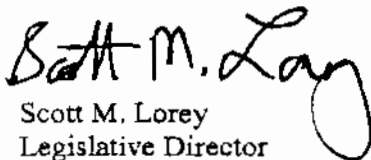
We would also encourage a strong consideration of NO<sub>x</sub> reductions on a year-round basis. New York, via state regulation, began mandating a year-round nitrogen cap that went into effect October 1, 2004 after the SIP Call season ended. The New England Governors and Eastern Canadian Premiers (NEG/ECP) have been vital in providing a template for cooperation between the two countries. Their joint efforts led to significant results already and should be continued in the future as both seek to further reduce the effects of sulfur and nitrogen emissions.

Monitoring and reporting efforts are critical to provide the necessary feedback to determine if the emissions reduction programs are having the desired effects. That is why programs like CASTNET and others (NADP, TIME/LTM) are so desperately needed. In fact, the budgets for such programs needs to be increased over the next several years, instead of facing cuts as has been the case.

In addition to the important work of programs that monitor the water chemistry of impacted areas, biological recovery studies are also necessary. While much is known about the changes to water including its pH and acid neutralizing capacity (ANC), much less is clear about the recovery of the plant and animal life in these water bodies. Funding for expanded research is again crucial to help determine the success of programs and future actions to be taken when reducing sulfur, nitrogen and mercury.

Thank you for the opportunity to comment on these important issues to both Canada and the United States. We look forward to your continued efforts to protect the Adirondack Park from the damages of acid rain.

Sincerely,

  
Scott M. Lorey  
Legislative Director