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February 25, 2005

Ms. Jacklyn A. Brillling, Secretary  
New York State Public Service Commission  
3 Empire State Plaza, Albany, New York 12223-1350

Re: CASE 05-M-0090 - In the Matter of the System Benefits Charge III

Dear Ms. Brillling:

We are happy to respond to the Public Service Commission's request for comment on continuing the Systems Benefits Charge. We strongly support the PSC's efforts to provide essential funding for environmental monitoring and research on air pollution impacts from electricity generation to the Adirondack Park. Acidic deposition and its associated impacts continues as the most far-reaching ecological threat to the Adirondacks, an area long known to be the most sensitive region to acidic deposition in the northeastern U.S.

The SBC has been a major source of support of the Adirondack Long Term Monitoring program, which includes the year-round monthly sampling of 52 lakes across the six million-acre Adirondack Park. This is the longest, uninterrupted record (21 years) of lake chemistry of this scale in the U.S. Results have been published in peer-reviewed journals and the data publicly posted. The data have been extensively used to understand ecosystem response to atmospheric pollution and have become the foundation data for modeling of future **emission/ecosystem** response scenarios. This work has been recognized internationally and has continued to position New York as a leader in the field of environmental monitoring and the determination of environmental policy based on hard scientific data. The SBC funding has made that possible.

There is no other comparable year-round baseline-monitoring network of lakes in the Adirondacks. Additionally, the availability of specialized chemistry, which provides toxic aluminum measurements, is not being analyzed by any other laboratory in the Adirondacks. Toxic aluminum is one of the most relevant chemical indicators of biological survivability. The existing Adirondack Long Term Monitoring project staff and laboratory are uniquely qualified to carry out both the field and laboratory component to the required quality **control/quality** assurance levels.

We are in a critical time for Adirondack ecosystem response to air pollution changes. Many Adirondack lakes are showing the first signs of chemistry improvements while others have shown no change. With new air pollution legislation being considered, it is more essential than ever that the **long-term** lake record be continued and augmented as necessary (e.g. establish baseline for mercury).

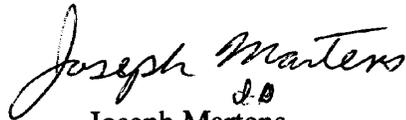
This time of atmospheric pollution changes and ecosystem response has caused other Adirondack areas needing examination. Many of these scientific data gaps have begun to be addressed but a shortage of funds required several sound proposals to go unfunded in the last round. Areas currently lacking include: baseline mercury monitoring in selected long term lakes; establishment of a biological response baseline; extension of the stream chemistry and biota baseline begun in the western Adirondacks; establishment of baseline hydrologic data; and funds to secure a data clearing house for long-term data and retrieval. These added benchmarks are essential. With various considerations for further emissions reductions underway, SBC program priorities should be shifted towards increased environmental monitoring for the Adirondack Park.

In summary, we offer comments on matters referred to in questions 2, 3, 4 and 7 in the Notice. We strongly recommend that the SBC program continue beyond its current expiration date and be extended at a minimum for another five years with funding to sustain the existing Adirondack acid rain long term monitoring work. Additionally, we advocate for increased funding to address the ecological response questions that have emerged in the Adirondacks over the last several years. The Adirondack long term monitoring work provides essential scientific data needed to evaluate electricity-related environmental impacts to support public decision-making.

Thank you for the opportunity to comment.

Sincerely,

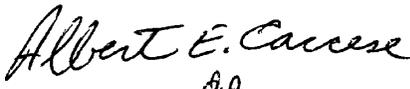
Adirondack Lakes Survey Corporation Board



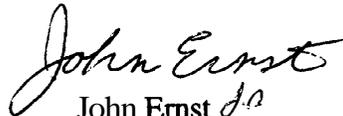
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