

August 9, 1982

The Honorable Robert Dole
United States Senate
Washington, D.C. 20510

Dear Senator Dole:

On July 22, the Senate Environment and Public Works Committee approved a "compromise" acid rain control provision in its package of amendments to the Clean Air Act. The "compromise" is no less onerous than earlier proposals.

If this provision were to become law, the United Mine Workers union estimates it could cause the loss or dislocation of nearly 90,000 coal mining jobs and an additional 225,000 associated jobs involving lost wages of \$6.6 billion annually when fully implemented. The proposal also would cause a dramatic rise in consumer electric bills in numerous Midwestern and Eastern states -- as much as 50 percent or more in the most severely affected areas.

A U.S. Department of Energy analysis of an earlier, but almost identical, proposal found the emission reduction program would cost \$3.6 billion per year. These costs, ultimately paid by consumers, would total \$200 to \$300 billion over the next 30 years assuming modest inflation. Even the Environment Committee estimated the cost of its proposal at \$3.9 billion per year. However, the costs are likely to be far higher because of the requirement that emissions from new plants be equally offset by further reductions at existing plants beyond the 8 million-ton-level reported by the committee. In fact, one coal company's analysis found that the offset requirement would increase the total reduction from existing plants from 8 to 12 million tons and would boost the annual cost to \$8.5 billion by 1995.

Despite projections that sulfur dioxide emissions will continue to decline in the future, these drastic new reductions would be on top of those already required by earlier Congressional action.

At the same time, there is little assurance that this new, massive control program will change the acidity of rainfall. The Environment and Public Works Committee has taken action based on only one of several developing theories about the formation of acid rain. It has acted in the belief that rainfall is rapidly becoming more acidic and that alleged damage caused by rainfall is increasing and spreading.

However, new reports from the U.S. Geological Survey and New York State's Department of Environmental Conservation call into question the premise that immediate action is required. In the longest continuous monitoring program of water quality, the USGS found that rainfall in New York State has remained virtually unchanged since it began its studies in 1965. Also, analysis of new data from New York State's lake monitoring program shows that in the last few years lakes have not become more acidic and in fact may be improving.

Other legitimate theories about acid rain were virtually ignored by the committee. Responsible researchers suggest that not enough is understood about this phenomenon and man's role in its formation to embark on yet another costly regulatory program with the results far from certain.

Some research implicates local emissions in the Northeast as a far greater and more likely contributor to the acidity of rainfall in that region than more distant sources. Yet, the bill would require little or no reduction in sulfur dioxide emissions in the Northeastern states. In fact, there is astounding inequity in the proposal. Kentucky, whose total sulfur dioxide emissions are almost identical to those of New York, would be required to reduce emissions within its boundaries four times as much as New York -- the very state most often cited as suffering damage from rainfall.

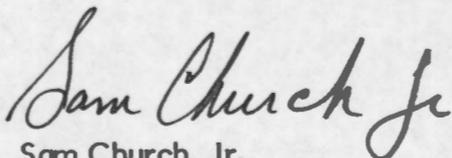
In addition to inequities in the committee's approach, a number of atmospheric chemists now state that new reductions in sulfur dioxide emissions will not bring an equivalent change in rainfall because other chemicals in the atmosphere control the acidity of rainfall.

Sen. Robert C. Byrd and numerous other co-sponsors have proposed an amendment which takes a far more responsible approach to the acid rain issue by providing for acceleration of the existing federal acid rain research program. We believe such an approach considers the broad national public interest in this matter. This approach, or a similar one proposed in the House which also authorizes funds to mitigate environmental effects immediately in lakes found to be acid, would provide Congress with a prudent course of action.

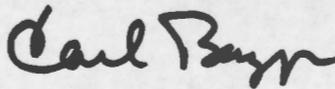
While such approaches are loudly criticized by some groups, they take into account the certainty of high economic and social costs which would result from the Environment Committee's approach along with the uncertainty that additional, new controls would bring about a change in the acidity of rainfall.

The coal industry -- miners and mining companies -- stand united in the strongest possible opposition to the Environment Committee's acid rain provision. Congress must reject such costly and premature proposals if it is to establish a sensible balance between the nation's employment, economic and energy needs and its need to protect the natural environment.

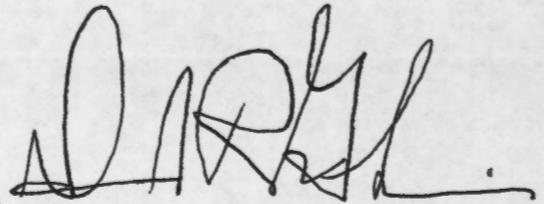
Sincerely,



Sam Church, Jr.
President
United Mine Workers
of America



Carl E. Bagge
President
National Coal
Association



Daniel R. Gerkin
President
Mining and
Reclamation
Council of
America