

**COMMENTS OF THE GROUP AGAINST SMOG AND POLLUTION
REGARDING THE ALLEGHENY COUNTY HEALTH DEPARTMENT'S
DRAFT AIR MONITORING NETWORK PLAN FOR CALENDAR YEAR 2023**

The Allegheny County Health Department (“ACHD”) Air Quality Program (“Program” or “AQP”) published its Air Monitoring Network Plan for Calendar Year 2023 (“Draft Plan” or “2023 Plan”) for public comment on May 10, 2022.¹ The Group Against Smog and Pollution (“GASP”) has reviewed the Draft Plan and provides the following comments.

I. NCore Site Relocation

For the reasons detailed below, GASP opposes relocation of the ACHD Air Quality Program’s NCore, PAMS, NATTS, IMPROVE, and CSN monitoring sites (collectively “NCore Site”). Our opposition to the move stems from what appears to be a lack of foresight, transparency, and analysis surrounding the proposed move. The reason(s) for, cost(s) of, and benefit(s) of the move are neither public nor clear. This approach fosters distrust and fundamentally thwarts the public’s ability to provide meaningful, informed comments.

a. ACHD officials must explain the reason(s) for relocating ACHD’s NCore Site.

For the time being, ACHD’s NCore Site is located in Building 7 of the Clack Campus, a 5.2-acre parcel of land donated to Allegheny County in 1957 “in order to enable the [then newly established] Allegheny County Health Department to perform public health services.”² EPA AQS data show air quality monitoring began on this site in 1978, though it appears the majority of monitoring activities began in 2001.³ With decades of data, no lease to upset continuity, and free parking, this location – outwardly – appears to be an ideal location for an NCore Site.

GASP first learned of the potential for the County to sell the Clack Campus from a community redevelopment group in the City of Pittsburgh’s Lawrenceville neighborhood in April 2021.⁴ The news seemed noteworthy but given the factors above and lack of actual redevelopment plans it was not a source of great concern.

ACHD published its draft Air Monitoring Network Plan for Calendar Year 2022⁵ for public comment in July 2021. The draft did not list a potential relocation of the NCore Site in

¹ <https://www.alleghenycounty.us/News/2022/Health-Department-2022/6442477908.aspx>

² See Allegheny County Department of Real Estate: Deed Book 3619, pages 49 – 53; Assessment Lot and Block Number 49-K-62.

³ See “Monitoring Listing” spreadsheet at https://aqs.epa.gov/aqsweb/airdata/download_files.html (AQS site number 420030008).

⁴ <http://www.lunited.org/clackworkshops1/>

⁵ https://www.alleghenycounty.us/uploadedFiles/Allegheny_Home/Health_Department/Resources/Data_and_Reporting/Air_Quality_Reports/2022%20ANP%202021.6.16%20-%20DRAFT.pdf

that document's Proposed Changes to the Air Monitoring Network section, but GASP nonetheless raised the issue in our comments to the 2022 Plan. ACHD replied:

The Department is working with the EPA to determine a potential new monitoring station that could replace the Lawrenceville site if it is required to be moved. The Department will provide more information on any potential moves when any become available.⁶

This felt as though it came out of left field. There did not appear to be any need, impetus, or basis for the massive undertaking of relocating the NCore Site. Further, it was troubling that the initial news of a potential change at the Clack Campus did not come from ACHD.

At an April 2022 public meeting ACHD staff announced the County planned to sell the Clack Campus and that all Health Department programs with offices at the Clack Campus – including the Air Quality Program – would be relocated. This was the first public acknowledgement of the NCore Site relocation plan moving forward.

Section 3.4.1 of ACHD's 2023 Plan adds additional details regarding what appears to be the best possible new NCore Site should the relocation proceed, but more fundamental questions like, "why is ACHD undertaking this massive effort in the first place?" and, "did decision-makers understand or examine impacts of the decision?" have been skipped entirely. To provide anything approaching informed, meaningful comments, the public must have this sort of information. Without it, the public is being asked to comment on a proposal about which very little is known and that – in light of the opening paragraph to this section – appears to be wholly irrational.

b. ACHD must examine the costs and benefits of relocating the NCore Site, then make that information public.

Air quality monitoring is vital to public health. The data collected inform the public, support scientific research, and gauge compliance with federal air quality standards.⁷ Abandoning the Clack Campus will be a very significant alteration to Air Quality Program operations. Interruptions to services or new barriers to those services created by the move could have an adverse impact on public health. Yet, it is not clear that ACHD conducted any analysis of the impacts of its decision to relocate the NCore Site. This – again – prevents the public from offering meaningful comments on the proposed action.

Importantly, the criticism here stems from the lack of effort and transparency, not a predetermination that the relocation will only cause harm. There might very well be benefits to both public health and ACHD operations. Unfortunately, that is impossible to know unless ACHD provides the information. Accordingly, ACHD must – at a minimum – examine and report on:

⁶ 2022 Plan (Jan. 11, 2022), at 77.

⁷ See 40 C.F.R. Part 58, App. D § 1.1.

- i. Existing workload interruptions and impact on staff capacity to conduct its existing, critical, core (monitoring) tasks while tending to relocation tasks
- ii. Future efficiencies gained if any
- iii. Lease costs and potential future costs incurred if a repeat of this process arises due to lease disputes
- iv. Quantifiable benefits to Northside communities
- v. Specialized moving and set-up costs for delicate instrumentation
- vi. Improvements in monitoring technology and capacity at new facility
- vii. Adverse impacts on research, studies, etc., due to loss of monitoring site continuity (statistical comparability)
- viii. New research opportunities at a new location and or with newer facilities
- ix. Workflow effects on locating the monitoring staff geographically distant from other AQP operations

c. *Assuming relocation of the NCore Site proceeds, ACHD must make and disclose plans for minimizing potential impacts and gauging outcomes.*

Ideally, ACHD would undertake the strongly suggested analysis in the prior section and then, if the relocation proceeds, create a plan for public review addressing potential pitfalls or add those details to the Draft Plan. Even without an extensive analysis, GASP has identified three topics that should receive attention and at least be addressed in the Draft Plan Section 3.4.1:

- i. The Draft Plan notes that historic ozone and particulate matter monitoring occurred near to the Fulton Street site. The Draft Plan does not explain the significance of these statements but by implication they appear to address options for statistical comparability analysis. ACHD must plan to address the implications of comparability (differences, reasons, etc.), specifically from a public outreach perspective. Undoubtedly this is an issue for NAAQS compliance determinations and research studies. However, outside the technical and mathematical solutions, ACHD should ensure any changes can be explained simply for people used to seeing certain values of certain pollutants at the Clack Campus (Lawrenceville) location.
- ii. To address comparability, ACHD should consider locating monitors ahead of the final move at the Fulton Street site or leaving monitors at the Clack Campus behind after the move to better quantify differences. The Fulton Street site's closer proximity to downtown and interstate traffic seems likely to impact data and all available tools ACHD can deploy to detect details of that difference would be in keeping with the Appendix D goals. To some extent, it could itself be a special study.

- iii. The Draft Plan stated that locating the NCore Site in the Northside “would greatly benefit many underserved communities in that area.” We disagree, strongly but partially. ACHD’s recent efforts to expand air quality monitoring in many underserved communities in the Mon Valley have been outstanding (barring some delays in publish study data (see below)). Greater information and increased enforcement efforts have benefitted the community. However, we believe those benefits came about due to a combination of additional monitoring *along with* a commitment to engage with the local community(ies) and a plan of action to target (monitor for) pollutants of concern. Thus, ACHD should not hold out the mere relocation of a monitoring station to an underserved community alone as a benefit. However, we strongly agree additional monitoring is an important first step to providing a community benefit. If ACHD continues with the relocation, as part of the relocation plan, ACHD must commit to plan for exactly how the relocation will benefit the community.

II. Public Engagement Issues

In comments on prior years’ Annual Network Plans, GASP has raised several issues regarding ACHD increasing access to information. One issue – especially regarding the above-mentioned Mon Valley monitoring – does not appear to have been addressed over the past year. Accordingly, please explain ACHD’s planned efforts in the coming year to address a consistent, clear method for sharing air quality data generated as part of special studies (non-AQI data) with the public.