



PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY

962 Wayne Ave • Suite 610 • Silver Spring, MD 20910

August 14, 2022

Deb Haaland
Secretary
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Tom Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

RE: Cease Research Work on Public Lands Using Potent Greenhouse Gases

Dear Secretaries Haaland and Vilsack:

I am writing you on behalf of Public Employees for Environmental Responsibility (PEER) to bring to your attention the climate implications of research projects taking place on National Park Service (NPS) and U.S. Forest Service (USFS) lands. Specifically, I am referencing National Science Foundation (NSF) funded projects using sulfur hexafluoride (SF₆), a greenhouse gas 22,800 more powerful at trapping atmospheric heat over a century than carbon dioxide and with an atmospheric lifespan of 3,200 years. SF₆ is the most destructive greenhouse gas ever known. **We request that your agencies cease allowing the use of SF₆ on public lands.**

During 2021, NSF's the National Ecological Observatory Network (NEON) used approximately 18 pounds of SF₆ on 22 sites, most on NPS and USFS sites. Over the life of the project, NEON used six times as much SF₆ – 108 pounds on a total of 24 sites – on these projects. That is equivalent to burning over a million pounds of coal. (<https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator> accessed on 7/28/22)

Concentrations of SF₆ in the atmosphere have been steadily rising since the mid-1970s. The U.S. Environmental Protection Agency has a program designed to lessen use of SF₆ by the electrical industry due to its ultra-potency as a greenhouse gas.

According to records PEER has obtained under the Freedom of Information Act (FOIA), research scientists from both NPS and USFS began expressing concern about usage of SF₆ with NEON researchers beginning in 2020. For two years, these protests did not draw a response from NEON. Ultimately, this year, NEON has agreed to reduce its SF₆ usage to 4 pounds a year at ten sites for up to another three years.

Those FOIA records indicate that the NPS and USFS researchers were uncertain over their authority to curtail or minimize SF₆ releases. Nor were they aware of any agency policy or guidance on the question.

What makes this situation stand in greater relief is that NEON admits that there are alternatives to SF₆, notably argon, which is not a greenhouse gas. While NEON contends that the collection process for its re-aeration research is more difficult to implement, that difficulty does not preclude

the continuation of this type of research. Moreover, it is our understanding that similar research projects have switched to argon without issue.

I am sure that you will agree that scientific research is important but is not a justification for environmental irresponsibility. PEER is asking you to review the research activities conducted on Interior and USDA lands to determine if they entail similar release of ultra-potent greenhouse gases, such as SF6.

As you know, President Biden's "Executive Order on Tackling the Climate Crisis at Home and Abroad" (Exec. Order No. 14008) declares a "climate crisis." That order directs an "all-government" approach in which every agency must "prioritize action on climate change in their policy-making and budget processes."

To that end, we request that your agencies cease allowing research projects using SF6 on public lands.

We further ask that your agencies review the release of other potent greenhouse gases in any research permitted on DOI and USDA lands and whether your agencies can reduce the carbon footprint of these activities without diminishing their research value.

Finally, PEER requests that you consider adopting guidance to empower your senior research scientists to take steps to minimize the climate impacts flowing from research work on these public lands.

If you have any questions about these requests or wish to see supporting documentation, please do not hesitate to contact me. We are interested in setting up a time to discuss this issue with you.

Thank you,

Tim Whitehouse
Executive Director

Cc: National Climate Taskforce