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AN ASSESSMENT QF THE **RISKS** OF STRATOSPHERIC MODIFICATION

Volume I: EXECUTIVE SUMMARY

Submission to the

Science Advisory 8oard U.S. Environmental Protection Agency

By

Office of Air and Radiation U.S. Environmental Protection Agency

October 1986

Comments should be addressed to:

John S. Hoffman U.S. Environmental Protection Agency, PM 221 401 M Street, S. W. Washington, D.C. 20460 **USA**

The following report is being submitted to the Science Advisory Board and to the public for review and comment. Until the Science Advisory Board review has been completed and the document is revised, this assessment does not represent EPA's official position on the risks associated with stratospheric modification. This report has been written as part of the activities of the EPA's congressionally•established Science Advisory Board, a public group providing extramural advice on scientific issues. The Board is structured to provide a balanced independent expert assessment of scientific issues it reviews, and hence, the contents of this draft report do not necessarily represent the views and policies of the EPA nor of other agencies in the Executive Branch of the Federal Government. Until the final report is available, EPA requests that none of the information contained in this draft be cited or quoted. Written comments can be sent to the Science Advisory Board and would be appraciated by November 14, 1986. Pub lic comments should be submitted to John Hoffman by December 15, 1986.

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SUMMARY

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Rising concentrations of chlorofluorocarbons (CFCs) and Halons have the potential to deplete stratospheric ozone and to allow additional quantities of the biologically damaging part of the ultraviolet radiation spectrum (UV-B) to penetrate to the earth's surface, where it would harm public health and the environment. While considerable scientific uncertainties remain, substantial advances have taken place in understanding of this issue since the development of the theory linking CFCs to ozone depletion in 1974.

Over the past decade, non-aerosol CFC use has risen as the global economy has grown. A variety of studies indicate that the long-term growth of CFCs, in the absence of additional regulation, is likely to be between 1% and 4% annually.

Atmospheric concentrations of other trace gases (e.g., carbon dioxide, methane, and nitrous oxide) are also growing. The sources of carbon dioxide increases can be linked primarily to expanded use of fossil fuels, and secondarily to deforestation. In contrast, far less is understood about the sources and sinks of methane and nitrous oxide. Unlike CFCs and halons, these gases either add to the amount of ozone or reduce the rate of depletion. Like CFCs, these **gases** are greenhouse gases that are predicted to increase global temperatures and change global climate. Since future trends in emissions of these gases are important factors in determining ozone modification and climate change, assumptions about their growth must be carefully considered.

Models of stratospheric chemistry and physics are used to predict future changes in the ozone layer. While these models fail to accurately reflect all the complex forces which interact in the atmosphere to create and destroy ozone, nonetheless, they represent the most advanced tools for understanding possible changes in the ozone layer that could be related to future scenarios of trace gases. One-dimensional models predict that average global ozone will decline for all scenarios in which CFCs grow. Two-dimensional models analyze ozone depletion for seasons and latitudes. These models predict depletion at higher latitudes even if CFC use is reduced to 1980 levels and other trace gases continue to grow at recent rates.

Model estimates of total column depletion are sensitive to the continued release of greenhouse gases that counter ozone loss. If an assumption is made that emissions of these gases are eventually limited in order to reduce the magnitude of future global warming, the depletion expected from any scenario of CFC emissions would be larger.

Because the current models oversimplify or fail to include processes that occur in the atmosphere, a critical question relates to how useful they are as a predictive tool. One method of testing their validity is to compare their predictions against observations of the atmosphere. Models currently closely reproduce most atmospheric measurements, but fail to accurately reproduce some, including ozone in the upper stratosphere and the rapid depletion of ozone in Antarctica in the last six years. These inconsistencies lower our

confidence in models, making us less certain that they are not underpredicting or overpredicting depletion. At this time, however, analysis of Antarctic data has not proceeded far enough to justify abandoning current models as the best tools for risk assessment.

Many inputs to these models are based on laboratory measurements. Uncertainty about the accuracy of these measurements is one potential area responsible for the inadequacies of current model predictions. Analyses of the implications of this class of uncertainties indicate that if CFCs grow, there is only a small chance of no depletion even if laboratory measurements change within the ranges tested. The chances of a depletion significantly greater than the average predicted appears larger than the chances of one significantly smaller.

If depletion in column ozone takes place, increases will occur in basal and squamous skin cancer cases and are considered likely for melanoma skin cancer. Deaths from these cancers would also increase. If depletion occurs, additional cataract cases could be expected, along with increased suppression of the immune system. The effect of this immune suppression on infectious diseases like herpes and leishmaniasis would be to reduce the body's capacity to prevent spread or outbreaks. Little is known about effects on other cutaneous infectious diseases.

While quantitative assessments of the risk to crops and terrestial and aquatic ecosystems from higher UV-B associated with depletion are not yet possible, evidence appears to indicate that significant risks exist. While some cultivars of plants are less susceptible and photorepair mechanisms may reduce losses, field tests to date have shown damaging effects on yield. In the case of aquatic organisms, experimental design is far more complicated . Initial studies suggest that some species are damaged more than others . The net effect on productivity and any implications for the aquatic food chain cannot yet be determined.

If ozone depletes, polymers would be expected to degrade more quickly, although quantitative estimates are available for only one polymer. Finally, based on one study, depletion is predicted to increase both tropospheric ozone (i.e., smog) in urban areas and the production of hydrogen peroxide (an acid rain precursor).

Increases in CFCs and other trace gases and re3ulting stratospheric modification all are expected to contribute to global warming and climate change. According to the National Academy of Science the magnitude of future warming is very uncertain. The currently accepted range is $3^{\circ}C + 1.5^{\circ}C$ for doubled CO2 or its equivalent in radiative forcings from other gases. Cloud response to warming is the major uncertainty with regard to the magnitude of warming. The timing of the warming is also uncertain. Oceanic heat absorption is the major question with regard to the speed which the world's temperature can expect to increase.

Global warming is likely to cause thermal expansion of the oceans and alpine melting, raising sea level. The contribution of ice deglaciation to sea level rise is much more uncertain.

Sea level rise can be expected to innundate land, especially wetlands, erode recreational beaches, and cause increased flooding and saltwater intrusion into freshwater areas. River delta areas are expected to be most at risk. Case studies in two U.S. cities indicate that sea level rise can be expected to cause significant economic damage, some of which could be mitigated by anticipatory actions .

The climate change **(e.g.,** shifts in rainfall, storm tracks, etc.) that would be associated with global warming is more difficult to predict than sea level rise, as are the effects of that climate change. Nevertheless, studies suggest that forests, water resources, agriculture, and health will all be affected.

An integrated analysis of the likely emissions, atmospheric response, and effects (based on a one-dimensional model) indicates that under the central case assumptions the U.S. can expect 40 million additional skin cancer cases and 800 , 000 deaths for people alive today and those born during the next 88 years if there is no further action taken to limit CFCs. Two-dimensional models, because they include estimates of depletion by latitude, may be more suitable for estimating impacts. Preliminary analysis using these models suggests that the effects could be twice as high. In addition, estimates of ozone depletion would be much higher if greenhouse gases are eventually limited, approximately doubling for a case which assumed that greenhouse gases are limited in order to hold warming to 3°C (assuming 3°C for doubled CO2; the actual limitation imposed by such a reduction in greenhouse gases ·could be 1.5°C or 4 .5°C, based on the NAS range).

Integrated analyses show that estimates of damages are sensitive to the rate of CFC and other trace gas growth. Quantitative estimates of damage are also sensitive to assumptions underlying relationships between exposure and impact in each of the effects area.

A further underlying uncertainty exists about risk estimates -- no experiments can be conducted with the earth to validate these models. Thus, there is no guarantee that models are not under or overpredicting the magnitude of the risks.

SUMMARY OF FINDINGS

- 1. IN THE ABSENCE OF REGULATION, ATMOSPHERIC CONCENTRATIONS OF POTENTIAL OZONE-DEPLETING CHEMICALS ARE LIKELY TO INCREASE WITH WORLD ECONOMIC GROWTH .
	- la. Estimates of chlorofluorocarbons (CFCs) 11 and 12 based on economic analysis indicate that average long-term growth is likely to be 2.5% per year; growth of CFC 113 and 22 is expected to be higher.
	- lb. While significant uncertainty surrounds long-term growth estimates, a variety of studies indicate that growth is unlikely to be negative nor greater than 5%; several studies indicate that a long-term growth rate between 1.2% and 3.8% is more likely.
	- le. Halon 1211 and 1301, two brominated fire extinguishants, may grow fast enough to become significant contributers to ozone depletion.
- 2. CONCENTRATIONS OF OTHER TRACE SPECIES (CARBON DIOXIDE, METHANE, NITROUS OXIDE) THAT COUNTER OZONE DEPLETION ARE ASSUMED TO INCREASE AT APPROXIMATELY THE SAME RATE AS IN RECENT YEARS. THESE TRACE SPECIES ARE ALSO GREENHOUSE GASES THAT WILL ADD TO GLOBAL **WARMING.**
	- 2a. A variety of studies based on future fossil fuel consumption have estimated carbon dioxide (CO2) growth. Assuming moderate economic growth and technological change, CO2 emissions were predicted to grow at 0.6% annually.
	- 2b. Recent measurements of nitrous oxide (N20) show growth of 0 . 25% per year. Continuation of the trend was used in the central case.
	- 2c. Recent measurements of methane (CH4) show 1.0% per year increase. Continuation of the trend was assumed in the central case.
	- 2d. Significant uncertainty surrounds all these trends. Because little is understood about the sources and sinks of methane, and it has a relatively short atmospheric lifetime, assumptions about future trends of .this gas are particularly uncertain.
	- 2e. The standard assumption the modeling community has used in developing scenarios has been that long-term projections of trace gases that counter ozone depletion will not be limited by future decisionmakers in order to reduce the magnitude of global warming.
- 3. MODELS OF THE STRATOSPHERE PREDICT DEPLETION FOR SCENARIOS IN WHICH CFCS AND OTHER TRACE GASES CONTINUE TO GROW. MODELS PREDICT DEPLETION AT HIGHER LATITUDES EVEN FOR SCENARIOS IN WHICH THE EMISSIONS OF POTENTIAL OZONE DEPLETERS ARE LOWER THAN TODAY'S EMISSIONS.
	- 3a. While different models produce slightly different changes in ozone for the same scenario, they generally provide roughly consistent estimates.

- 3b. Estimated changes in ozone levels are dependent on assumptions about trace gas growth. For example, if CFCs do not grow and other trace gases continue to increase, greater amounts of ozone are likely.
- 3c. Based on a two-dimensional model, depletion with 3% growth of CFCs and standard assumptions for gases that counter depletion is predicted to be 7% by 2030 at 50°N.
- 4. PREDICTED OZONE DEPLETION IS SIGNIFICANTLY GREATER FOR SCENARIOS IN WHICH GROWTH IN CO2, N20, AND CH4 IS NOT ASSUMED TO CONTINUE UNABATED FOR THE NEXT CENTURY.
	- 4a. Depletion estimates would be doubled if greenhouse warming were ultimately limited to 3°C (the limitation assumes 3°C temperature sensitivity for double CO_2 ; the actual limit could vary by $\pm 50\%$).
	- 4b. Depletion would be even greater for a more stringent temperature limit.
- s: A NUMBER OF INCONSISTENCIES BETWEEN OBSERVATIONS AND PREDICTIONS LOWERS OUR CONFIDENCE THAT MODELS ARE NOT UNDER OR OVER PREDICTING DEPLETION. HOWEVER, CURRENT MODELS DO ACCURATELY REPRESENT MANY ELEMENTS OF THE ATMOSPHERE AND STILL APPEAR TO BE THE MOST RELIABLE METHOD OF ESTIMATING THE RISKS ASSOCIATED WITH FUTURE SCENARIOS OF TRACE GAS EMISSIONS.
	- 5a. Models reproduce most observations of the current atmosphere relatively well, supporting the belief they can usefully be used as tools to predict the future.
	- Sb. Discrepancies exist between some predictions and both observations and measurements of various species in the current atmosphere thus lowering our confidence that the models will not under or over predict depletion.
	- 5c. From 1970-83 models have predicted depletion in upper layers of the stratosphere. This is consistent with actual measurements at 40 km.
	- Sd. Analyses of the uncertainties of laboratory measurements used as one class of inputs to atmospheric models indicate that if chlorine grows, depletion is likely. The analyses also demonstrate that a depletion significantly larger than that yielded by the standard inputs is more likely than a depletion that is significantly lower.
- 6. THE FAILURE OF MODELS TO PREDICT THE ANTARCTIC OZONE DEPLETION RAISES SERIOUS QUESTIONS ABOUT MODEL RELIABILITY. HOWEVER, UNTIL A BETTER UNDERSTANDING AND ANALYSIS OF THIS PHENOMENON IS ACHIEVED, CURRENT MODELS ARE STILL THE MOST APPROPRIATE TOOLS FOR RISK ASSESSMENT.
	- 6a. The seasonal Antarctic depletion has beeri verified by several different types of instruments; models with conventional chemistry cannot explain the Antarctic depletion.
- 6b. Several chemical and dynamical theories have been proposed to explain the seasonal Antarctic depletion. Current observations are insufficient to•determine which, if any, are true or false.
- 6c. At this time, it is unclear whether the seasonal Antarctic depletion is a precursor to a general atmospheric phenomenon, will be an anomaly that remains in this unique and geographically isolated region, or will disappear altogether.
- 6d. Satellite measurements from Nimbus 7 appear to indicate a depletion in recent years in the Arctic. The scientific community has not analyzed this data sufficiently to reach a consensus on the validity of the data as its been interpreted, its meaning, or even to conclude it is not part of a cyclical trend. Until this data and its interpretation are verified, and causality is determined, it cannot be used as a basis for considering the risks from CFCs .
- 7 . OZONE DEPLETION WILL CAUSE AN INCREASE IN SQUAMOUS AND BASAL SKIN CANCERS; A GREATER RISE WILL OCCUR IN SQUAMOUS SKIN CANCER.
	- 7a. Squamous skin cancer can be anticipated to rise between 2 and 5 percent for each one percent depletion of ozone. Squamous skin cancer is generally more serious than basal cancer and proves fatal in a higher percentage of cases.
	- 7b. Basal skin cancer can be anticipated to rise between 1 and 3 percent for each one percent depletion of ozone.
	- 7c. Although only a very small percentage of cases of these skin cancers result in mortality, the large number of additional cases will **aggregate** to create a substantial increase in total number of skin cancers.
- 8. OZONE DEPLETION IS LIKELY TO CAUSE AN INCREASE IN MELANOMA SKIN CANCER, ALTHOUGH SOME UNCERTAINTY REMAINS ABOUT THIS CONCLUSION .
	- 8a. Melanoma is a deadly form of skin cancer that currently kills 5,000 people in the United States a year.
	- 8b. Although conclusive evidence does not yet exist, many factors suggest that UV-B radiation plays a substantial role in the incidence of melanoma skin cancer.
	- 8c. Melanoma incidence is likely to rise between 1 and 2 percent for each one percent increase in ozone depletion.
	- 8d. Melanoma mortality is likely to increase about 0.8 to 1.5 percent for each one percent increase in ozone depletion.

9. OZONE DEPLETION IS LIKELY TO SUPPRESS THE IMMUNE SYSTEM OF HUMANS.

- 9a. Laboratory evidence and case studies demonstrate that exposure to UV-B radiation has the effect of suppressing the immune system.
- 9b. Although quantitative estimates are impossible, depletion is likely to increase outbreaks of herpes and the severity of leishmaniasis.
- 9c. The impact of immune suppression on other infectious cutaneous diseases has not yet been studied.

10. OZONE DEPLETION IS LIKELY TO CAUSE AN INCREASE IN CATARACTS.

- 10a. Laboratory evidence and epidemiology studies have shown that exposure to UV-B radiation is one cause of cataracts.
- 10b. A 1% ozone depletion is likely to cause between a 0.3% to 0.6% increase in cataract cases.
- 10c. In the U.S., cataracts are treatable, but are still the third leading cause of blindness. In developing countries they are also a primary source of blindness.
- 11. OZONE DEPLETION IS LIKELY TO REDUCE CROP YIELD IN CERTAIN CULTIVARS, AND ALTER COMPETITION BETWEEN PLANTS. THE DIMENSIONS OF THE CHANGES ARE NOT YET QUANTIFIABLE.
	- lla. Information on the effects of increased UV-B exposure on plants is very limited. Few plants have been tested under natural conditions.
	- llb. Some cultivars appear to be more susceptible to UV-B than others. Inadequate information exists to determine why this occurs and if selective breeding could be an effective defense to mitigate damages from ozone depletion.
	- llc. Two out of three cultivars of soybeans tested were sensitive to enhanced UV-B. One cultivar that was tested extensively showed a yield loss of up to 25% for a 20% depletion.
	- lld. Field experiments show UV-B may affect competition between plant species. Ozone depletion, particularly in conjunction with other stresses, might alter ecosystems in ways not yet understood.
- 12. OZONE DEPLETION IS LIKELY TO ALTER AQUATIC ECOSYSTEMS AND POSSIBLY AFFECT THE AQUATIC FOOD CHAIN. THE DIMENSIONS OF THE POSSIBLE CHANGE ARE NOT YET QUANTIFIABLE.
	- 12a. Limited experiments suggest that increased UV-B can alter the community composition of phytoplankton that form the base of the aquatic food web, can curtail the survival of zooplankton, and can shorten breeding seasons.

- 12b. Uncertainties in the lifecycles of these organisms prevents quantitative estimation of effects, although some data exist which suggest that relatively low thresholds of tolerance to increases in UV-B could affect commercially important species. However, movement to limit exposure, and turbulence or mixing may limit damage to organisms.
- 13 . OZONE DEPLETION WOULD DEGRADE POLYMERS, SHORTENING THEIR USEFUL LIFE. COUNTERMEASURES WOULD ADD COST AND POSSIBLY REDUCE PRODUCT QUALITY .
	- 13a. Current usage shows that UV-B damages physical and chemical properties of certain polymers.
	- 13b. Stabilizers can be added to mitigate damage from increased UV-B, but at a price and possible loss in product quality.
	- 13c. Uncertainty exists about effects of higher UV-B on polymers due to a lack of an adequate experimental data base relating UV-B dose to degradation.
	- 13d. One study that examined the effects of UV-B on polyvinylchloride showed substantial losses from future ozone depletion.
- 14. BY INCREASING UV-B, OZONE DEPLETION MAY INCREASE URBAN OZONE, A POLLUTANT REGULATED UNDER THE CLEAN AIR ACT. IT MAY ALSO INCREASE HYDROGEN PEROXIDE, AN ACID RAIN PRECURSOR.
	- 14a. The only study on this issue stated that increased UV-B could cause increases in ground-based ozone (i . e., smog) . In addition, because the ozone formed earlier in the day, it would affect larger populations.
	- 14b. It also showed that global warming could enhance the negative effect of enhanced UV-B on ground-based oxidants.
	- 14c. The study also predicted that hydrogen peroxide production was extremely sensitive to increased UV-B.
	- 14d. Continued studies on the effects of UV-B on ground-based oxidants and hydrogen peroxide formation are needed to validate this initial effort .
- 15. INCREA3ES IN TRACE SPECIES THAT MODIFY OZONE ARE ALSO EXPECTED TO CAUSE A SIGNIFICANT GLOBAL WARMING.
	- 15a. The National Academy of Sciences estimated a warming or $3^{\circ}C +$ 1.5°C for doubled CO2. This range is attributable to uncertainty as to whether changes in clouds will amplify or dampen global warming.
- 15b. The timing of the warming is expected to lag the emission of **gases** by 10 to 40 years. Uncertainty about the timing is due to a lack of knowledge about the rate of oceanic heat absorption.
- 15c. Changes in stratospheric water vapor would raise global temperatures. Changes in vertical structure of ozone would add to warming until depletion became large, at which point it would begin decreasing temperatures.
- 15d. Due to deficiencies in model representations of a variety of . phenomena, regional characteristics of the climate change that would accompany the global warming are largely uncertain. In general, temperatures will increase the further one goes from the equator, the hydrological cycle will intensify, and areas of wetness and dryness will shift. Little else about climate changes can be stated with certainty.
- 16. SEA LEVEL IS LIKELY TO RISE AS A RESULT OF GLOBAL WARMING. PREDICTIONS ARE UNCERTAIN, BUT SEVERAL STUDIES HAVE ESTIMATED A RANGE FROM 50 CM TO 200 CM BY 2100 IF GREENHOUSE GAS GROWTH IS NOT CURTAILED.
	- 16a. The primary cause of sea level rise will be thermal expansion and alpine ice melting. Only for the higher estimates will Antarctic deglaciation contribute significantly.
	- 16b. Sea level rise can be expected to innudate and erode coastal land, to increase flooding, and to produce saltwater intrusion into freshwater areas.
	- 16c. Wetlands and river deltas will be most adversely affected. By 2100 the U.S. could lose up to 50% to 80% of its coastal wetlands.
	- 16d. Preliminary studies suggest adverse economic effects, which could be substantially reduced by anticipatory planning.
- 17. GLOBAL **WARMING** CAN BE EXPECTED TO ALTER REGIONAL CLIMATES AND AFFECT MANY ASPECTS OF THE ENVIRONMENT.
	- 17a. Based on analyses of past climatic changes of roughly similar magnitude (but which occurred over far longer periods of time), forests will be altered significantly .
	- 17b. Limited assessments suggest that important changes in farm productivity can be expected throughout the world.
	- 17c. The location and design of water resource projects are likely to be altered by climate change.
	- 17d. Human morbidity and mortality could be influenced. According to the one study on this issue, in the absence of full acclimatization (which is doubtful in built-up cities like New York) mortality from extreme temperatures is likely to increase.

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- 18. FOR THE MOST LIKELY ASSUMPTIONS ABOUT EMISSIONS, ATMOSPHERIC RESPONSE, AND EFFECTS, SIGNIFICANT IMPACTS ARE EXPECTED FOR HUMAN HEALTH AND THE ENVIRONMENT . HOWEVER, MAJOR UNCERTAINTIES EXIST ABOUT EACH AREA. CONSEQUENTLY THE SENSITIVITY OF RISK ESTIMATES TO THOSE UNCERTAINTIES MUST BE EXAMINED. ESTIMATES OF RISKS IN THIS STUDY ASSUME NO ACTION IS TAKEN TO REDUCE DEPLETION.
	- 18a. For the central case (2.5% CFC growth, 0.6% CO2 growth, and recent trends for other gases), an additional 40 million skin cancer cases and 800,000 deaths are projected for people alive today and those born in the next 88 years in the United States. An additional 12 million cataract cases could occur.
	- 18b. The earth's equilibrium temperature would rise from 3°C to 9.5°C by 2075.
	- 18c. Estimates of risk from ozone depletion are highly sensitive to the assumptions about growth in greenhouse gases that counter such depletion. Limiting equilibrium global warming to 3°C (assuming 3°C sensitivity for doubled CO2) would more than double the risks of ozone depletion from CFC and halon growth.
	- 18d. Estimates of risks are highly sensitive to CFC and halon growth rates. If one assumes half the CFC growth rate of the standard case, that is 1.2% instead of 2.5%, estimated damage can be reduced by 90%. If one assumes a growth rate of 3.8%, estimated damages would increase 400%.
	- 18e. Damage estimates are sensitive to the atmospheric model used. With two-dimensional models, estimates of all damages would approximately double.
	- 18f. Uncertainties about dose-response relationships lead to changes in estimates of the number of cases by 35% for nonmelanoma and by as much as 60% for melanoma.
	- 18g. Quantitative estimates of damages for other areas -- crops, aquatics, ground-based ozone, sea level rise, and polymers - cannot yet be calculated.

Moving from the surface of the earth towards space, the temperature falls until the stratosphere is reached at 10-15 kilometers above the earth's surface. At this point temperatures begin to rise (Exhibit 1). The stratosphere sustains unique conditions in which ozone (03) is constantly produced and destroyed, providing an abundance that varies latitudinally, seasonally and annually around long-term means.

EXHIBIT 1

Temperature Profile and Ozone Distribution in the Atmosphere

alzi**m**

Small quantities of chlorine, nitrogen, hydrogen, or bromine can combine in chemical reactions with ozone molecules to produce bimolecular oxygen (02). These substances act as a catalyst. They are freed following a series of reactions and can repeatedly combine with ozone. Chlorofluorocarbons, methyl chloroform and carbon tetrachloride can carry chlorine to the stratosphere, halons can carry bromine, and nitrous oxide can carry nitrogen. The chlorine and bromine from chlorofluorocarbons and halons act as strong depleters of ozone. Nitrous oxide, in the face of growing chlorine, can interfere with the destruction of ozone by chlorine. Carbon dioxide cools the stratosphere, reducing the destruction rate of ozone. Methane creates ozone in the troposphere (which contains 10% of the column ozone) and interferes with ozone destruction in the stratosphere. It also increases stratospheric water vapor. All of these molecules are greenhouse gases. Exhibit 2 summarizes their atmospheric effects.

Stratospheric Perturbants and Their Effects

1 Ramanathan et al., 1985.

² Connell and Wuebbles, 1986.

3 Isaksen, personal communication.

⁴ National Academy of Sciences, 1984.

5 Isaksen and Stordal, 1986.

'National Academy of Sciences (1984) notes the direct effect of N2O on column ozone. In the presence of high levels of chlorine, N2O may interfere with the catalytic cycle of chlorine, reducing net depletion (Stolarski, personal communication).

Depletion of ozone would allow more ultraviolet radiation to reach the earth's surface where it could harm human life, plants and aquatic organisms, and materials. Less ozone would allow for increased penetration of the biologically damaging, shorter, part of the ultraviolet radiation spectrum, generally referred to as UV-B radiation (Exhibit 3).

EXHIBIT 3

Percent Increase in UV-B Radiation for a 10% Depletion

Results for Washington, D.C., for clear skies in June. Source:NASA UV model results

RISING CONCENTRATIONS OF TRACE SPECIES

Past emissions of CFC 11 and 12 have caused a rise in their atmospheric concentrations (Exhibit 4). These CFCs have been rising at 5% annually . Atmospheric measurements show that CFC 113 has grown at 10% annually, and Halon 1211 at 23% annually. Chlorofluorocarbons are used in foam blowing, refrigeration and air conditioning, as a solvent in electronics and metal industries, as aerosol propellants, and in a variety of specialty applications . Halons are used in many applications as a fire extinguishant.

Historical Production and Atmospheric Concentrations of CFC-11 and CFC-12

Historical Production of CFC-11 and CFC-12

900 $300 700 -$ **ILLIONS OF KILCGRAMS** 600 500 400 300 Africant $\mathbb{C} \cap \mathbb{C}$ $.2₀$ \circ $.950$ 1965 1970 1975 1980 1985 **YEAR**

Total reported production of CFC-11 and CFC-12 increased rapidly throughout
the 1960s and 1970s, reaching a maximum of 813 thousand metric tons in 1974.
Aerosol applications declined since the mid-1970s, while nonaerosol applications continued to increase. (Note: aerosol/nonaerosol divisions prior to 1976 are estimates.)

CFCL, (P) RAGGED POWT. BARBADOS $\frac{1}{3}$ 210 $CFC-11$ CF.CL. RAGGED POWIT, BARBADO manggunaanananaganaan $CFC-12$ 11111 1978 ٠.

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Measured Increases in Tropospheric Concentrations of CFC-11 and CFC-12

Average concentrations of CFC-11 and CFC-12 are increasing at approximately five percent per year. Date are from the Atmospheric Lifetime Experiment.

Source: World Meteorological Organization, 1986

1979

Based on past trends, emissions of CFC 11 and 12 have closely tracked GNP, growing about twice as fast (Exhibit 5) since the early 1960s. CFC-113 has grown at an even faster pace.

EXHIBIT 5

Nonaerosol Production Per Capita of CFC-11 and CFC-12 Has Been Correlated With Gross Domestic Product (GDP) Per Capita in Developed Countries (1962 to 1980)

Production per capita of CFC-11 and CFC-12 for nonaerosol applications has been correlated with GDP per capita in the United
States and other OECD countries.

CFC production, population, and GDP data obtained from: Glbbs, Michael J., (1986), <u>Scenarios of CFC Use: 1985 to 2075,</u>
ICF incorporated, prepared for the U.S. Environmental Protection Agency. Source:

Concentrations Are Predicted to Rise

Market studies based on extensive economic analysis by several authors for a variety of geographic areas predict continued growth in these chemicals. Longer-term studies suggest growth rates of between 1-4% per year. Based on these analyses, from now until 2050, an average growth of 2.5% appears most likely.

 $-15-$

Source: "Overview Paper for Topic #2: Projections of Puture Demand," UNEP Workshop, May 1976

> Based on these projections, the future growth of CFCs would be below historical levels. Exhibit 7 shows that world GNP per capita in 2050 is expected to roughly be equivalent to that of Europe today and slightly more than half that of the U.S. Despite the growth in world income, global CFC use. would be considerably less than that of either the U.S. or Europe today. This analysis suggests that, in the absence of regulation, CFC use will continue to grow, but at reduced rates as technological change improves the efficiency of use or shifts consumers to alternatives.

> > EXHIBIT 7

Current and Projected Future CFC-11 and CFC-12 · Use Per Capita and GNP Per Capita

Projections of future trends in CO2 are based on extensive energy modelling and analysis. Exhibit 8 shows a wide range of estimates based on varying assumptions about economic growth, non-fossil alternatives, energy conservation, etc. For the purposes of the central case, we have relied upon the 50th percentile case developed by Nordhaus (NAS 1983).

EXHIBIT 8

Projected Carbon Dioxide Emissions and Doubling Time of Concentrations

CO2 emission projections are shown for EPA (Seidel and Keyes 1983); NAS (Nordhaus and Yohe 1983): and Edmonds (Edmonds et al., 1984). The brackets indicate the approximate time at which concentrations reach twice the pre-industrial level.

N2O measurements and analysis of sources and sinks have been more limited. However, recent atmospheric measurements show a 0.25% annual increase. For the purposes of developing scenarios, this annual growth rate has been extended into the future.

Future trends in methane concentrations are difficult to determine. Scientific understanding of its sources and sinks is limited. However, its relatively short atmospheric lifetime (of about 10 years), suggests that changes in emissions over time could substantially influence atmospheric levels. In the absence of better information, we assume that recent increases of approximately 1.0% per year will continue in the future.

For evaluating risks, a critical relationship exists between emissions and atmospheric concentrations. CFC 11, 12, and 113 have atmospheric lifetimes of 75, 110, and 90 years respectively. This means that about 1/3 of current emissions will still be in the atmosphere for that length of time into the future. Since current emissions greatly exceed losses to the stratosphere, concentrations will rise even if emissions stop growing (Exhibit 9).

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reduction of 85% in CPC-12 emissions (A) would be required to hold
pncentrations constant (B). Computed with simplified model of
purce and loss terms. See Appeadix to Chapter 2.

ATMOSPHERIC RESPONSE

To explore the effects on ozone of changes in the atmosphere's chemical composition two approaches are utilized. First, measurements of recent changes in ozone levels and other atmospheric constituents can be compared to measured increases in CFCs and other trace gases. Second, models can be developed which attempt to replicate atmospheric processes affecting ozone levels. Moreover, the first approach can be used as an important source of information and validation of the second .

Ozone Monitoring

A range of monitoring using balloons and Umkehr readings show small, but significant, decreases of approximately 3 percent in the upper atmosphere at mid-latitudes and a 12 percent increase in ozone (from a smaller base) in the lower troposphere. Because of a lack of global distribution of ozone monitoring equipment, no acceptable method has yet been developed to aggregate stations to determine if net change has occurred on a global basis . Analysis using data for the period from 1970-80 suggests, however, that no significant net change in total column ozone has occurred.

Model Predictions

A relatively good consensus exists among models that treat the world as a single column of air (one-dimensional models), and among two-dimensional models (2-D) that consider seasonality and latitude. Of these model types, 2-D models project higher average depletion and show more depletion the further one moves from the equator (Exhibit 10).

modeling groups for a common scenario of:

Compound

 (1986) .

CFCs

CH4

N20

 $CO₂$

 $1-D$ model.

EXHIBIT 10

Growth Rate (% per year)

1.0 (concentrations)

0.25 (concentrations)

-0.60 (concentrations)

3.0 (emissions)

Results shown for 2-D models of Isaksen and AER, 1-D models of

Brasseur and Wuebbles, and Connell's parameterization of the LLNL

Source: Chemical Manufacturers Association, (1986); World
Neterorological Organization, (1986); Connel, (1986);
Brasseur and DeRudder, (1986); and Iaakaen and Stordal,

Model Comparison for Coupled

Scenario: 1-D and 2-D Model,

Global Average

Two Dimensional Model: CFC Emissions Rolled Back to 1980 Levels

Depletion by Latitude for 3% Growth CFCs

Results shown from constant CFC emissions at the 1980 level (approximately 10% less than current emissions for time dependent seasonally-averaged change in osone for 1980 CFC emissions and coupled perturbations); CH4 concentrations at Paper year, N2O concentrations at 0.25% per year, and CO2 concentrations at approximately 0.5% per year. Changes shown for 40°N, 50°N, and 60°N.
Temperature feedback considered in model.

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Source: Isaksen (personal communication).

Results shown for time dependent seasonally-average changes in ozone for 3% growth per year in CFC emissions; 1% growth in CH4 concentrations; 0.25% growth in N2O concentrations, and approximately 0.5% growth in CO2 concentrations. Changes shown for 40°N, 50°N, and 60°N. Temperature feedback considered in model.

Source: Isaksen (personal communication).

Testing Model Validity

As one test of their validity, model predictions can be compared against current atmospheric observations and historical changes. These comparisons show that current models do a relatively good job replicating most observations, but inconsistencies with some measurements of atmospheric constituents do occur. These inconsistencies reduce our confidence in the predictive capabilities of the current models.

Comparisons of models against upper stratospheric depletion estimates from the 1970 to 1980 timeframe show relative consistency (Exhibit 11).

EXHIBIT 11

In contrast, comparison of model results to the Antarctic ozone hole and to the alleged Arctic hole suggest that factors influencing this seasonal loss of ozone may not be incorporated in current models (Exhibit 12).

EXHIBIT 12

Until more information is available concerning the cause of the changes in Antarctica, revisions to these models would be unwarranted. Inadequate scientific evidence is available to determine whether the phenomenon is a precursor to future atmospheric behavior or merely an anomaly created by special geographical conditions unique to Antarctica.

Scientific analysis of the alleged "Arctic hole" has not proceeded far enough to draw any conclusions about whether it is real or temporary, or to determine its cause. Consequently, neither phenomenon provides a basis for revising model depletion estimates, although they clearly raise the possibility of missing chemistry (or aerosols, for example). Continued research and analysis could in the future necessitate a revision of risk estimates.

Uncertainties in Laboratory Inputs

The uncertainties about kinetic rates based on laboratory experiments were examined in several studies. This represents one possible area of uncertainties in current model configurations. These studies suggest that depletion is likely if CFCs grow, and that depletion significantly greater than predicted in the standard case is more likely than depletion significantly smaller .

Global Warming

Global warming is considered likely as a result of increases in these trace gases, including vertical reorganization of ozone in the stratosphere and increased water vapor. As a benchmark, the magnitude of warming has been estimated as $3^{\circ}C + 1.5^{\circ}C$ for doubled CO2 or the radiative equivalent in other gases. The primary source of uncertainty is the feedback from clouds. The timing of this warming is considered uncertain because of delays currently estimated of 10-40 years due to oceanic heat absorption. Regional climatic change cannot yet be reliably predicted. Only gross characteristics are possible such as, increased warming the further one moves toward the poles, intensified hydrological cycles, and changes in the wetness or dryness of most of the world's regions. The global warming predicted for standard scenarios is shown in (Exhibit 13).

RISKS TO HUMAN HEALTH

Because UV-B varies by latitude under current conditions, a natural experiment exists with more UV-B radiation affecting those living closer to the equator than those located nearer the poles. Based on extensive laboratory studies and epidemiological analysis, basal and squamous skin cancer have been demonstrated to be related to UV-B radiation and can be expected to increase with ozone depletion (Exhibit 14). Death is fairly infrequent for these cancers -- about 1% of cases are fatal with the preponderance of deaths resulting from squamous cancers.

A 3-D Time Dependent Model Projection Realized Temperature Increases

A 1-D Time Dependent Model Projection of Equilibrium Temperature

Exhibit 13

Only two time-dependent simulations have been conducted using a general circulation model. The results, shown above, indicate an increase in global average temperature of approximately 0.9°C by the year 2000 for Scenario A (which is a continuation of current rates of growth in trace gases). Scenario B (which reflects reduced rates of trace gas growth) indicates a warming of about 0.5°C by 2000. Scenario A achieves a radiative forcing equivalent to that of doubled CO2 about 40 years from now; Scenario B requires 75 years. Temperature equilibrium warming in this model is 9°C for doubled CO2.

* Computed assuming that the climate sensitivity to a doubling of carbon dioxide is 3°C. This assumption is in the middle of the NAS range of 1.5°C to 4.5°C (see Chapter 6). Note that the actual warming that may be realized will lag by several decades or more.

Relationship Between UV and Skin Cancer Incidence

Project Percentage Change in Incidence of Basal and Squamous Cell Skin Cancers for a Ten Percent Depletion in Ozone for San Francisco Using DNA Action Spectrum

Setlow DNA

Mid

30.41

16.43

51.87

57.93

High

40.45

26.97

72.19

84.68

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Low

21.15

33.95

35.34

6.72

Basal Male

Penale

Penale

Squanous

Male

* According to annual UVB measurements at selected areas of the United States, with regression lines based on an exponential model.

Source: Scotto and Fraumeni (1982).

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Melanoma is a more deadly form of skin cancer and there is greater uncertainty attached to its relationship to UV-B. While there is not proof that UV -B causes melanoma, overall the evidence supports a judgment that it is an important contributing factor (Exhibit 15).

EXHIBIT 15

Information That Has Been Interpreted As Supporting the Conclusion that Solar Radiation is One of Causes of Cutaneous Malignant Melanoma (CMM)

- Whites have higher CMM incidence and mortality rates than blacks.
- Light -skinned whites i ncluding those who are unable to tan or who can poorly, get more CMM than darker-skinned whites.
- Sun exposure l eading to sunburn apparently induces melanocytic nevi.
- Individuals who have more melanocytic nevi, develop more CNM; the greatest risk is associated with a particular type of nevus--the dysplastic nevus.
- Sunlight induces freckling, and freckling is an important risk factor.
- Incidence has been increasing in cohorts in a manner consistent with changes in patterns of sun exposure, particularly with respect to increasing intermittent exposure of certain anatomical sites.
- Immigrants who move to sunnier climates have higher rates of CMM than populations in their country of origin and develop rates approaching those of the adopted country; this increase in risk is particularly accentuated in individuals arriving before the age of puberty $(10-14$ years).
- C!1M risk is associated with chi ldhood sunburn; this association may reflect an individual's pigmentary characteristics or may be related to nevus development.
- Most studies that have used latitude as a surrogate for sunlight or UVB exposure have found an increase in the incidence or mortality of CMM as one approaches the equator .
- Patients with xeroderma pigmentosum who cannot repair CVB- induced l esions in skin DNA have a 2000-fold increased risk of CMM by the age of 20.
- One form of C~IM, Hutchinson's melanotic freckle melanoma, appears almost invariably on the chronically sun **damaged** skin of older people.

Information That Has Been Interpreted As Not Supporting the Conclusion that Solar Radiation :s One of Causes of Cutaneous Melanoma

- Some ecologic epidemiology studies have failed to find a latitudinal gradient for CMM .
- Outdoor workers generally have lower incidence and mortality rates for CNM than indoor workers.
- Unlike basal cell and squamous cell carcinomas, most CMM occurs on sites that are not habitually exposed to sunlight.

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Laboratory experiments and case studies demonstrate that UV-B can suppress the immune system in animals and humans. This response is thought to be a factor in the development of skin cancer. In addition, two infectious diseases, herpes and leishmaniasis, appear to be affected by UV-B, in part, due to suppression of the immune system. Other diseases have not been studied.

Although scientific understanding of the causes of cataracts is incomplete, UV-B exposure appears to be one contributing factor to their development. Epidemiological studies, animal studies, and biochemical analysis provide support for linking UV-B and cataracts, though other factors including exposure to UV-A also play a role (Exhibit 16).

EXHIBIT 16

Although curable, cataracts in the U.S. still cause one-third of all blindness. In less developed countries, the health hazards are more severe.

RISKS TO TERRESTIAL CROPS AND AQUATIC ECOSYSTEMS

Because the current species of plants have evolved under existing radiation conditions, the question arises as to their ability to grow under elevated exposure to UV-B. Early studies tested tolerance to UV-B in greenhouses and showed substantial susceptibility for many cultivars. However, limited experiments under field conditions have demonstrated that to some extent a photorepair mechanism reduces damage.

Soybeans are the crop that has been tested most extensively. These field studies conducted for a period of over five years show that for a particular cultivar reductions in yield of up to 25 percent are possible for a 20 percent depletion of ozone.

Field experiments have also demonstrated that competitive balances between plants can be influenced by higher UV-B. The implications cannot be calculated, however, due to the lack of understanding about current ecosystem dynamics and the paucity of field experiments on the subject.

The use of selective breeding to choose genotypes insensitive to UV-B may be possible. However, because the genetic basis for resistance is not adequately understood, this mitigation approach remains uncertain.

Consequently, while evidence indicates that yield from some cultivars of crops may be reduced, the magnitude and dimensions are uncertain.

Based on laboratory experiments -aquatic organisms appear to have low thresholds to UV-B exposure. Enhanced UV-B would probably alter the community composition of phytoplankton, which are at the bottom of the food chain and which must remain close to the waters surface to absorb sunlight. Larvae of commercially important aquatic organisms also appear subject to damage from enhanced UV-B: The great uncertainties, however, are the extent of exposure to enhanced UV-Bin natural conditions in which water mixing and turbulence may play a role, and the life cycles of the organisms. Current information suggests a significant risk. For example, one study showed a 8% anchovy loss for a 9% depletion. But current knowledge is insufficient to determine the actual dimensions or magnitude of the risk.

·RISKS TO POLYMERS

Ultraviolet-B radiation harms polymers, causing cracking, yellowing, and other effects that reduce their useful life. Stabilizers can be added, at a cost, to reduce damage, although in some cases they may also reduce product viability . Increases in humidity and temperature could exacaberate harm to polymers.

Due to a lack qf experimental data, uncartainty exists about the effects of UV-Band ozone depletion on polymers, requiring approximate estimation methods to be used.

Only one polymer has been analyzed in detail -- polyvinylchloride (PVC). Based on a single study, 26% ozone aepletion by 2075 would cause a cumulative economic damage of 4.7 billion dollars (undiscounted) in the U.S.

RISKS TO TROPOSPHERIC AIR POLLUTION

One study recently analyzed the effects of increased UV-B on the formation of ground-based oxidants (i.e., smog). It showed that in three cities increases in UV-B could increase ground-based ozone (regulated by EPA at 0.12 ppm), with global warming excaberating the situation (Exhibit 17). Groundbased ozone would also form earlier on the day, exposing larger numbers of people to peak values.

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Global Warming Would Exacerbate Effects of Depletion on Ground-Based Ozone

Increase in Ground-Based Ozone

Increase in Ground-Based Ozone

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Increase in Ground-Based Ozone

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In addition, a preliminary study indicates a strong relationship between UV-Band hydrogen peroxide, an oxidant and acid rain precursor. In Los Angeles the effect of 33% depletion was to double hydrogen peroxide; in Philadelphia it would increase by a factor of 16. These findings need to be verified in chamber tests .

RISKS FROM CLIMATE CHANGE

CFCs and stratospheric modification may contribute as much as 40-50% of total predicted global warming in high trace gas growth cases and 20-30% in the central case. Estimates of the effects of climate change are in early stages of research.

Potential Increases and Effects of Sea Level

Different studies have analyzed the potential contributions to sea level rise from different sources. Several have made estimates of thermal expansion due to global warming. One study has also estimated alpine mountain runoff and its contribution to sea level rise, while others have looked at the potential contribution from deglaciation. The estimates are quite consistent (Exhibit 18) .

EXHIBIT 18

Estimates of Future Sea Level Rise (centimeters)

Year 2100 by Cause (Year 2085 for Revelle 1983):

a/ Revelle attributes 16 cm to other factors.

£/ Hoffman et al. (1983) assumed that the glacial contribution would be one to two times the contribution of thermal expansion.

c/ NAS (1985) estimate includes extrapolation of thermal expansion from Revelle (1983).

Sources: Hoffman et al. (1986); Meier et al. (1985); Hoffman et al. (1983): Revelle (1983); Thomas (1985).

Sea level rise can be expected to innundate marshes, erode coastal areas, increase flooding, and cause saltwater intrusion (Exhibit 19).

One study estimated that a 100 to 200 cm sea level rise would eliminate 50 to 80% of coastal wetlands depending, in part, on whether new wetlands are allowed to form or whether developed areas are protected. Several case studies have demonstrated that specific recreational beaches would disappear, unless periodic beach and island nourishment with sand occurred. Case studies of Galveston and Charleston indicate that significant economic damage would occur, particularly from flooding. These studies also show that anticipatory planning can significantly reduce damages.

Other studies suggest river deltas are particularly at risk from sea level rise. Much of the Mississippi delta is already expected to disappear over time due to subsidence; sea level rise would accelerate this problem. In Bangladesh and Egypt, one study estimated that subsidence and global sea level rise could cause displacement of 16-21 percent of Egypt's population and 9-21 percent of the population of Bangladesh.

Possible Effects on Forests

Climate models predict that a global warming of approximately 1.5°C to 4 . 5°C will be induced by a doubling of atmospheric CO2 or equivalent radiative increases from other trace gases. This CO2 doubling or its equivalent is likely to take place during the next 50 to 100 years. The period 18,000 to 0 years B.P. is one possible analog for a global climate change of this magnitude. The geological record from this glacial to inter- glacial interval provides a basis for qualitatively understanding how vegetation may change in response to large climatic change, though historically this occurred over a much longer time period.

The paleovegetational record shows that climatic change as large as that expected to occur in response to a CO2-doubling is likely to induce significant changes in the composition and patterns of the world's biomes. Changes of 2°C to 4°C have been significant enough to alter the composition of biomes, and to cause new biomes to appear and others to disappear. At 18,000 B.P., the vegetation in Eastern North America was quite distinct from that of the present day. The cold/dry climate of that time seems to have precluded the widespread growth of birch, hemlock, beech, alder, hornbeam, ash, elm and chestnut, all of which are fairly abundant in present-day deciduous forest. Southern pines were limited to Florida along with oak and hickory.

Limited experiments conducted with dynamic vegetation models for North America suggest that decreases in net biomass may occur and that significant changes in species composition are likely. Experiments with one model suggest that Eastern North American biomass may be reduced by 11 megagrams per hectare (10% of live biomass) given the equivalent of a doubled CO2 environment. Plant taxa will respond individually rather than as whole communities to regional changes in climate variables. At this time such analyses must be treated as only suggestive of the kinds of change that could occur. Many critical processes are simplified or omitted and the actual situation could be worse or better.

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Evolution of March as Sea Level Rises

Erosion; The Bruun Rule

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Future Substantial Watland Loss Where There is Vacant Upland Complete Wetland Loss Where House is Protected

in Response to Rise in See Lever \mathcal{L}_c ^Futura
NE LOHN ⁵ulure
BB Lävel Current Currom
See Love

Coastal marshes have kept pace with the slow rate of sea level rise that has
characterized the last several thousand years. Thus, the area of marsh has
expanded over time as new lands were inundated. If in the future, sea Fines faster than the obility of the mersh to keep pace, the marsh area will
contract. Construction of bulkheads to protect economic development may
prevent new mersh from foreing and result in a total loss of marsh in som arass.

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A rise in sea level of 5 causes immediate inundation. Nowever it would
eventually require the offshore bottom to rise by 5. The necessary 5 and A'
would be supplied from the upper part of the beach A. Total shoreline retr

Percent of tidal cycles in which specified concentration is exceeded at
Torresdele during a recurrence of the 1960's drought for three sea level
scenarios. The 250 mg Cl/l level is the EPA drinking water standard for
chlor

Source: Mill et al. 1981.

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Possible Effects on Crops

Climate has had a significant impact on farm productivity and geographical distribution of crops. Examples include the 1983 drought which contributed to a nearly 30% reduction in corn yields in the U.S., the persistent Great Plains drought between 1932-1937 which contributed to nearly 200,000 farm bankruptcies, and the climate shift of the Little Ice Age (1500-1800) which led to the abandonment of agricultural settlements in Scotland and Norway.

The main effects likely to occur at the field level will be physical impacts of changes in thermal regimes, water conditions, and pest infestations. High temperatures have caused direct damage to crops such as wheat and corn; moisture stress, often associated with elevated temperatures, is harmful to corn, soybean and wheat during flowering and grain fill; and increased pests are associated with higher, more favorable temperatures.

Even relatively small increases in the mean temperature can increase the probability of harmful effects in some regions. Analysis of historical data has shown that an increase of 1.7°C (3°F) in mean temperature changes the likelihood of a five consecutive daily maximum temperature event of at least 35°C (95°F) by about a factor of three for a city like Des Moines . In regions where crops are grown close to their maximum tolerance limits, changes in extreme temperature events may have significant harmful effects on crop growth and yield.

Current projections of the effects of climate change on agriculture are limited because of uncertainties in predicting local temperature and precipitation patterns using global climate models, and because of the need for improved research studies using controlled atmospheres, statistical regression models, dynamic crop models and integrated modeling approaches .

Higher ambient CO2 levels may enhance plant growth, decrease water use, and thereby increase crop yield and alter competitive balances in ecosystems. These factors must be evaluated in conjunction with changes in climate regimes. Large uncertainties exist because few long-term and multiple stress studies have been completed.

Possible Effects on Water Resources

There is evidence that climate change since the last ice age (18,000 years B.P.) has significantly altered the location of lakes although the extent of present day lakes is broadly comparable with 18,000 years B.P. For example, there is evidence indicating the existence of many tropical lakes and swamps in the Sahara, Arabian, and Thor Deserts around 9,000 to 8,000 years B.P .

The inextricable linkages between the water cycle and climate ensure that future climate change will significantly alter hydrological processes throughout the world. All natural hydrological processes -- precipitation, infiltration, storage and movement of soil moisture, surface and subsurface runoff, recharge of groundwater, and evapotranspiration -- will be affected

be affected if climate changes. Until models of regional climate change are improved, it will be difficult to obtain an understanding of the risks associated with gloal warming.

Possible Effects on Human Health

Weather has a profound effect on human health and well being. It has been demonstrated that weather impacts are associated with changes in birth rates, outbreaks of pneumonia, influenza, and bronchitis, and related to other morbidity effects and linked to pollen concentrations and high pollution levels .

Large increases in mqrtality have occurred during previous heat and cold waves. It is estimated that 1,327 fatalities occurred in the United States as a result of the 1980 heat wave and Missouri alone accounted for over 25% of that total.

Hot weather extremes appear to have a more substantial impact on mortality than cold wave episodes. Most research indicates that mortality during extreme heat events varies with age, sex, and race. Acclimatization may moderate the impact of successive heat waves over the short-term.

Threshold temperatures for cities have been determined which represent maximum and minimum temperatures associated with increases in total mortality. These threshold temperatures vary regionally, i.e., the threshold temperature for winter mortality in mild southern cities such as Atlanta is 0° C and for more northerly cities such as Philadelphia, the threshold temperature is -5°C. Humidity and precipitation also have an important impact on mortality, since it contributes to the body's ability to cool itself by evaporation of perspiration.

If future global warming induced by increased concentrations of trace gases does occur, it has the potential to significantly affect human mortality. In one study, total summertime mortality in New York City was estimated to increase by over 3,200 deaths per year for a 7°F trace gas-induced warming without acclimatization. If New Yorkers fully acclimatize, the number of additional deaths is estimated to be no different than today. It is -hypothesized that, if climate warming occurs, some additional deaths are likely to occur because economic conditions and the basic infrastructure of the city will prohibit full acclimatization even if behavior changes.

AN INTEGRATED ANALYSIS OF RISKS OF STRATOSPHERIC MODIFICATION

In order to assess risks from stratospheric modification in the absence of any future regulatory action, the various assumptions (e.g., trace gas growth, atmospheric response, incidence of skin cancer, etc .) have to be linked in an integrated modelling framework. Since significant uncertainty exists about each component, a central case was estimated along with alternative assumptions.¹

¹ The central case estimates reflect the most likely values of key assumptions and inputs used to model risks:

- Annual production of CFC 11 and 12 grow at an annual average rate of 2.5 percent from 1985 to 2050, and remains constant following 2050; growth rates for other chlorine and bromine substances as described in Chapter 3. The compounds analyzed include: CFC-11, CFC-12, CFC-22, CFC-113, methyl chloroform, carbon tetrachloride, Halon-1211, and Halon-1301. Emissions estimates reflect the storage of some substances in their end-use products for many years.
- Consensus estimates of the annual rates of increases in atmospheric concentrations of other trace gases are used: carbon dioxide (CO2) at 0.6 percent; methane (CH4) at 1.0 percent; and nitrous oxide (N20) at 0.25 percent. Trace gas assumptions are discussed in Chapter 4.
- A parameterized relationship between emissions of ozone modifiers, trace gas concentrations and global ozone depletion is used. This equation reflects the results of a one-dimensional model of the atmosphere using the most recent estimates of reaction rates .. The parameterized atmospheric model (described in Chapter 17) was derived from the LLNL Model developed by Wuebbles (reported in Chapter 5) .
- The latitudinal distribution of ozone depletion is evaluated using the results of a time-dependent two-dimensional model of the atmosphere. The latitudinal analysis of ozone depletion is presented in Chapter 17.
- The relationship between changes in ozone abundance and changes in UV flux reaching the earth's surface is based on estimates of a radiation model of the atmosphere. The estimates of UV flux are described in Chapter 17 .
- The risks to human health due to increases in UV are evaluated using middle estimates of dose-response coefficients developed in epidemiologic analyses in the U.S. The quantifiable risks to human health are described in Chapters 7, 8, and 10.
- The middle estimate by the National Academy of Sciences (NAS) for the sensitivity of the global climate to greenhouse gas forcings is used -- 3.0°C equilibrium warming for a doubling of the concentration of CO2. The National Academy of Sciences estimates are presented in Chapter 6. Recent analyses of climate sensitivity indicate that a 4°C sensitivity may be a preferred central case assumption (Manabe and Wetherald 1986; Washington and Meehl 1984; Hansen et al. 1984).

Exhibit 20 shows predicted depletion for a range of cases with varying assumptions about trace gas growth .

EXHIBIT 20

Global Average Ozone Depletion: Emission Scenarios (**LLNL 1-D Model Results)**

Key Assumptions:

Common to Each Scenario

- CH4 concentrations: 1% per year
- CO2 concentrations: 0.6% per year
- N20 concentrations: 0.25% per year

Varying in Each Scenario

Annual Growth in CFC-11 and CFC-12 production (%/year)

Other CFCs, and chlorinated and brominated compounds a lso **growing .**

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Exhibit 21 shows predicted health effects in the U.S for the central case assumptions.

EXHIBIT 21

Human Health Effects: Central Case (Additional Cumulative Cases and Deaths by Population Cohort)

c Analysis period for health effects: 2030-2164.

Exhibit 22 presents limited evidence from case studies for other key effects based on the central case assumptions.

Sensitivity to Assumptions About Greenhouse Gases that Counter Depletion

The above case assumes unconstrained greenhouse gas growth. Exhibit 23 examines an alternative set of assumptions which consider the possibility that future actions might be taken by governments to limit climate change .

Materials, Climate and Other Effects: Central Case

Global Average Ozone Depletion: Scenario of Limits to Future Global Warming

It shows the effects of ozone depletion if steps were taken to limit growth as trace gas emissions to the level of greenhouse warming of 3°C. By limiting the buffering of ozone depletion by the growth in these greenhouse gases, the negative effects of CFCs and halons on ozone in the stratosphere is increased.

Exhibits 24 and 25 show the effects on health effects and other factors for the same assumptions of limited greenhouse gas growth.

Comparison of One·Dimensional Model to a Two-Dimensional Model

The estimates given above are derived from the one-dimensional model used throughout this review. Comparison of these global ozone depletion estimates to those from a two-dimensional model, indicate that it produces levels of ozone depletion slightly less than half of those by a two-dimensional model (Exhibit 26).

Cumulative Health Effects for People in U.S. Alive Today and Born in Next 88 Years With Greenhouse Gases Limited

* Uncertain of ±l.5°C due to uncertainty about true sensitivity of earth to radiative forcing (e.g., same greenhouse gas increase).

Materials, Climate, and Other Effects: Scenarios of Limits to Future Global Warming (Figures in Parentheses are Percentage Changes from Central Case)

a/ Discounted over 1985-2075 using a real discount rate of 3 percent.

- b / Lowest estimate with anticipation of sea level rise; highest estimate without anticipation.
- *£1* Essex cultivar only in normal years.
- d/ Lowest estimate is for Los Angeles, California; highest estimate is for Nashville, Tennessee.
- ~/ Lowest estimate 15-meter vertical mixing of the top ocean layer; highest estimate 10-meter vertical mixing.

Sensitivity to Rate of CFC Growth

As shown in Exhibit 20, the amount of ozone depletion is sensitive to the assumption about future growth of CFCs and other trace gases (Exhibit 23). Assuming that other gases continue to increase, Exhibit 27 shows the impact on human health for different CFC growth scenarios.

Uncertainty About Health Dose-Repose Relationships

Uncertainty exists about the appropriate dose-response relationship for each of the human health effects. Exhibit 28 shows an analysis of the statistical uncertainty for each of thes areas.

OVERALL ASSESSMENT OF UNCERTAINTY

The largest quantitative uncertainties involve assumptions concerning future emissions of CFCs; future greenhouse gas growth; the use of 2-D models for predicting depletion, and uncertainties about dose-response parameters. Qualitatively the uncertainties for effects include implications of increased immune suppression; dose-response relationships for aquatics, crops, terrestial ecosystems; and a vary of climate impacts. With respect to modeling the atmospheric consequences of trace gas growth, there exists the possibility that some overlooked or missing factor or oversimplified process has lead to under- or over-predictions of changes in ozone.

Human Health Effects: Emissions Scenarios Additional Cumulative Cases and Deaths Over Lifetimes of People Alive Today (Figures in Parentheses are Percent Changes from Central Case)

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Human Health Effects: Sensitivity to Dose-Response Relationship Additional Cumulative Cases and Deaths Over Lifetimes of People in U.S. Alive Today and Born in Next 88 Years

CHLOROFLUOROCARBONS

Alliance for Responsible CFC Policy

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THE CASE FOR **RESPONSIBLE POLICY**

Foreword

This booklet was produced by the Alliance for Responsible CFC Policy, a broad-based coalition of more than 500 users and producers of chlorofluorocarbons (CFCs).

The Alliance was formed in 1980 to bring a balanced perspective on CFC-related issues. Its main purpose is to ensure that government directives and policies pertaining to CFCs are scientifically sound and balanced, and are economically and socially effective.

The Alliance encourages the use of sound science and thorough evaluation in reaching any decision about CFC regulation. Through publications and contacts with government officials, the Alliance seeks to ensure that the environmental, energy, economic and social consequences of further regulation of CFCs are widely understood.

The objectives of the Alliance are:

1. To promote a formal process for objective review of new science (at least annually) and provide a mechanism to integrate current assessments into the EPA's regulatory decision making.

2. To encourage the EPA to work on international rather than unilateral assessment and resolution of the science and need for action.

3. To encourage Congressional and executive branch guidance to the EPA on this issue.

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 \blacksquare hlorofluorocarbons (CFCs) are some of the most useful chemical compounds ever devised. They refrigerate our food; air condition our homes, workplaces, cars and public buildings; clean delicate electronic components; help insulate products; sterilize medical equipment and devices $-$ the list is long and diverse.

Yet, CFCs may be banned or their manufacture and use restricted because of a theory.

The theory, first proposed in 1974, is that CFCs released into the atmosphere rise to the stratosphere, where they break down, releasing chlorine. In a complex chemical system, according to the theory, chlorine could reduce stratospheric ozone, causing an increase in the amount of harmful ultraviolet radiation reaching the earth.

For more than a decade, scientific studies supported by the industry and government have yielded useful information but have not determined that the theory is valid. In fact, actual measurements of stratospheric ozone over the last 20 years have detected no net depletion of the globally averaged ozone layer. Nevertheless, the United States Environmental Protection Agency (EPA) prohibited the use of CFCs in nearly all aerosol products in 1978, and in 1980 proposed to consider further regulations that would place restrictions on all forms of CFCs. The Alliance for Responsible CFC Policy believes such restrictions would severely impact many industries and curtail the supply of beneficial $$ even essential- products. Moreover, they would force manufacturers to use

substitutes for CFCs that are less efficient, more costly and potentially hazardous. In many cases, no suitable substitutes exist. The Alliance, a coalition of chlorofluorocarbon users and producers, believes further restrictions on CFCs at this time are unwarranted and would be against the public interest. The coalition supports continuing scientific investigations and international cooperation to determine whether CFCs do indeed pose a threat to the environment.

Scientific studies to date indicate the answer can be found and that the time required will not significantly increase the hazard $-$ if such a hazard is found to exist.

The Alliance believes any further regulation of CFCs should be based on science, not supposition.

CFCs: Useful, Versatile, Safe

CFCs are man-made compounds of chlorine, fluorine, carbon and sometimes hydrogen.

Formulated to have specific characteristics, each member of the large CFC family is ideally suited for its end use. All are nonflammable, nonexplosive, nonirritating, noncorrosive, stable and low in toxicity $-$ a combination of desirable properties not often found in chemistry.

Science vs. Supposition

The basic issue in the CFC/ozone controversy is whether a theoretical premise, the subject of continuing scientific research, is cause for further regulation. Secondary to this issue are questions of whether regulations are appropriate and practical, and what impact they would have on the public and the nation's economy.

EPA has continued to encourage regulation. Its 1978 ban on CFC aerosol propellants was followed in 1980 by announcement of the agency's intention to put a cap on all CFC production and then phase down production by as much as 70 percent.

Although EPA has not promulgated any further CFC regulation, the agency continues to single out CFCs in the ongoing stratospheric ozone risk-assessment program rather than more appropriately examining **all** substances that may affect the ozone layer. The importance of considering all substances that affect the ozone layer was pointed out **in** a recent report by the National Aeronautics and Space Administration (NASA) which said, "It is now recognized that the chemical effects of (CFCs, carbon monoxide, carbon dioxide, methane, nitrous oxide and the nitrogen oxides) on atmospheric ozone are strongly coupled and should not be considered in isolation."

EPA is also leading U. S. government efforts urging international CFC regulation through the United Nations Environment Programme.

The Alliance, while agreeing that the CFC/ozone theory raises serious questions that must be answered, nevertheless believes regulation should be based on facts, not theoretical assessments. It calls for a thorough, unbiased review of the real risks versus the real benefits of CFCs to society, as well as an assessment and understanding of how all substances that may affect the ozone layer interact. Scientific investigations are going on (See pages 13-15) which will lead to identification and measurement of the risks, if they exist. The results will warn of any environmental threat in ample time to limit any significant adverse effects.

The Alliance sees no need to rush into regulatory decisions until the facts are known.

Why Not Switch To Other Compounds?

For many CFC applications, there are possible substitutes. Indeed, some substitutes are being used today. Almost without exception, however, the subsitutes do not have all the desirable characteristics of CFCs, and they often have such undesirable properties as flammability, explosiveness, toxicity or corrosiveness sometimes a combination of all four.

Could better compounds be created? Possibly, but so far efforts to do so have failed. Since the 1978 United States ban on CFC propellants, for example, several CFC producers have worked long and hard to find

substitute compounds. All efforts have fallen short. There is a finite number of chemical building blocks. More complex molecules can be formed, of course, but their very complexity gives them undesirable properties not present in CFCs. From all indications, the CFC family is unique.

Life Wouldn't Be The Same Without Them

By any measurement, CFCs are important to modern life:

 \blacksquare They help us meet basic needs food, shelter, health care, communications, leisure, transportation.

 \blacksquare They contribute immeasurably to our comfort, safety and productivity.

■ In the United States alone, CFCs are used by some 5,000 businesses at nearly 375,000 locations to produce goods and services worth more than \$28 billion a year. CFC-related jobs total 715,000. Major CFC applications are described here, beginning with the one that started it all: refrigeration.

ti Refrigeration

\$6 billion* 52,000 jobs**

The first commercial CFC was compounded in 1931, the result of an intensive research effort by a refrigerator manufacturer (General Motors) to find an efficient, safe refrigerant for home use.

Ammonia, sulfur dioxide and other refrigerants then in use were considered toxic or presented other hazards.

The new compound revolutionized the industry.

The first refrigerant, ice, served well for its time. It kept foods cool so they would last longer, and iced railroad cars made possible the shipment of perishables from distant points. But ice melts and has to be replaced, and that pan under the icebox always seemed to need emptying.

Early chemical refrigerants eliminated these drawbacks and performed the cooling job more efficiently, but their toxicity was an ever-present hazard. Also, some were explosive and/or flammable and most were corrosive.

CFCs captured the home refrigeration market because they are efficient, safe, stable and cost-effective. Another advantage is that they are chemically inert, so they do not damage gaskets, seals or lubricating oils in the refrigeration system. Today 75 percent of the food we eat depends upon the use of CFC refrigerants at some point in the production and distribution chain. In fact, many foods we enjoy would not be available in stores or would cost much more were it not for refrigeration.

Because of their unsurpassed cooling efficiency, CFCs are also widely used in commercial and industrial refrigeration and freezing equipment. Today, with energy efficiency a prime consideration, refrigeration engineers rely on the properties of CFCs in designing units that provide more cooling with less electric current than was thought possible a few years ago.

Air Conditioning

\$12.9 billion 150,000 jobs

Air conditioning makes the difference between comfort and misery when the weather is hot and sticky, but because we take it so much for granted, many of the other benefits it has brought us may not be evident. Consider:

Air conditioning in hospitals and nursing homes means a more healthful, comfortable environment, more conducive to healing.

■ Air conditioned offices and factories make it possible for people to perform at peak efficiency even in the hottest weather.

A number of important industries could not operate at all without air conditioning: manufacture of pharmaceuticals and photographic and printing films, computer installations, production of electronic equipment, telecommunications.

 \blacksquare Businesses, theaters, shopping malls, sports arenas now operate successfully year-round, regardless of the climate or weather.

Air conditioning in cars means not only more comfortable travel, but highway safety studies show it contributes to driving safety by reducing heat stress and fatigue.

■ CFCs and air conditioning technology have led to development of energy-efficient heat pumps, solar heat systems and other heat recovery devices.

All these benefits have been made possible largely by CFCs. Air conditioning technology has been based on them, and there are no safe, suitable substitutes.

Plastic Foams

\$2 billion 40,000 jobs

CFCs are important as blowing agents in making insulating, food packaging and cushioning foams out of plastic materials.

Insulating foams made with CFCs have twice the insulating value of fiberglass of the same thickness and also insulate better than foams made with other compounds. The foams are used in refrigerators and freezers, walls and roofs of houses and buildings, refrigerated railway cars and trucks, and in many industrial applications. They save substantial amounts of energy and reduce heating and cooling costs (See "Energy," page 12). Because of the foams' efficiency, insulating walls can be thinner, which saves materials and provides more usable space. The foams' light weight is also a spaceand energy-saving advantage, particularly in insulated trucks and railway cars.

CFC food packaging foams provide insulating value for hot and cold foods and do not absorb liquids or grease. Foam meat trays are becoming familiar in supermarkets. Foam egg cartons cushion the eggs so there is less breakage than with conventional cartons.

Cushioning foams are rapidly replacing the old spring-and-padding construction of mattresses and upholstered furniture, and the lower cost and greater comfort are boons for the consumer. In cars, airplanes and trains, CFC-blown foams provide superior cushioning in seats and padded areas, such as automobile dashboards.

While other blowing agents are often used for cushioning foams, those made with CFCs provide more softness, resiliency and durability.

Cleaning Agents

As microchips and other components of electronic equipment have become smaller and more sophisticated, the need for absolute cleanliness in manufacturing has become critical. CFCs are the cleaning agents of choice, because they remove the smallest contaminants and leave a clean, dry surface. Also, CFCs are safer to use than other cleaning agents, which are more toxic and/or flammable. In many other industries as well, CFCs are used as cleaning solvents and degreasers, providing the advantage of thorough cleaning without the volume of wastes generated by water and other solvents.

Food Freezants

\$0.4 billion More than 500 jobs

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The food we eat today is more varied year-round, more nutritious and better tasting than it used to be because of freezing, and CFCs deserve much of the credit. The frozen food revolution was

made possible by CFCs, which made refrigerators and freezers safe for home use.

Now, CFC food freezants provide ultrafast, direct contact freezing of many foods that could not be frozen satisfactorily by the usual "air blast" method. CFCs have energy-saving advantages over other freezants, which require up to eight times the energy needed with the CFC system.

\$0.1 billion

More than 500 jobs

CFCs mixed with a sterilizing agent are widely used in hospitals and in the manufacture of medical equipment and devices. The CFCs make the sterilizing agent nonflammable without affecting its sterilizing ability. Gloves, syringes, catheters and tubing, anesthetic and respiratory equipment, pharmaceuticals and other medical supplies are made sterile by these mixtures.

Fumigants, Pesticides CFCs blended with other chemicals are used as fumigants and pesticides in granaries, warehouses and the holds of ships.

CFCs: The Benefits Are Many

The preceding section mentioned many specific ways in which CFCs benefit society.

In sum, CFCs make important contributions in a number of critical areas today:

Public safety Because CFCs are not flammable, explosive or reactive with other substances and have low toxicity, they are ideal for use in places where substitute compounds might be hazardous to the public.

Public health A year-round supply of nutritious, healthful foods is dependent to a large extent on CFC refrigerants and freezants. Air conditioning creates more healthful indoor environments. Health care facilities and the pharmaceutical industry would be hard put to operate without the benefits made possible by CFCs.

Energy The efficient heat transfer properties of CFCs save substantial amounts of energy in refrigeration, air conditioning and insulation uses. It has been estimated that a United States ban on CFCs could, after 10 years, mean an annual energy penalty equal to 9-12 billion gallons of fuel oil, due to the forced use of less efficient materials.

The economy Besides the goods, services, businesses and jobs made possible by chlorofluorocarbons, products based on CFCs are important exports for the United States, contributing strongly to the nation's balance of trade.

Technology The availability of CFCs has led to important technological innovations, such as energy recuperators, hot water heat pumps, a solar heating system, an innovative cleaning system for electronic components, and a promising new method of cleaning coal which dramatically reduces ash and other pollutants when the coal is burned.

Searching for Answers

Ever since the question of whether CFCs damage the ozone layer was raised in 1974, science, industry and government have engaged in intensive efforts to determine the facts. In all this time, CFC emissions have not been found to have perturbed the natural behavior of ozone. Indeed, sophisticated scientific analysis has shown no persistent change in the total amount of atmospheric ozone over the last 20 years.

The research has focused primarily on the highly complex chemistry of the stratosphere. It is known that ozone acts as a giant filter to screen out some of the sun's harmful ultraviolet rays. The belief is that depletion of the ozone layer could result in increased incidence of some forms of skin cancer and damage to certain food crops and aquatic life.

Studying the stratosphere is extremely difficult, not only because of its distance from the earth (from eight to 30 miles) but also because the concentrations of ozone it contains are subject to frequent and often large natural fluctuations. However, by analysis of samples taken at various places and times through computer modeling, a great deal has been learned about stratospheric chemistry. It appears that the amount and distribution of ozone in the atmosphere are maintained by a dynamic balance between production (from solar ultraviolet radiation), destruction (by radicals derived from several trace gases) and transport by atmospheric motion. The process is not completely understood.

It is evident, however, that industrial, agricultural and natural processes play a part

in production of the trace gases. For example, carbon dioxide is increasing in the atmosphere due to increased burning of fossil fuels. Methane levels are also rising from sources thought to be natural wetlands, rice paddies and fermentation processes in cattle and other ruminants.

A 1986 report to Congress by the National Aeronautics and Space Administration (NASA) describes the current status of atmospheric science: what has been learned, what remains scientifically uncertain and what research still needs to be done.

A central point in the report is that the chemical effects of trace substances on atmospheric ozone are strongly coupled and should not be studied in isolation.

The report points out that low ozone levels observed in the winter of 1982-83 appear to be due to natural, rather than man-made causes. A recently observed ozone decrease in the Antarctic is not yet understood, the report states, and further study is needed to determine whether it is significant.

Though atmospheric observations have established the presence of key constituents, the report points out that current computer models do not adequately reproduce the present-day atmosphere. Discrepancies between observations and calculations limit the scientists' confidence in the predictive capability of the models.

The "Greenhouse" Effect

The NASA report deals at some length with the "greenhouse" effect, the predicted warming of the earth which some scientists suggest could have devastating effects, such as severe climate changes and dramatic rises in sea levels.

It is known that the earth's average temperature is determined by the amount of energy it receives from the sun, less the amount reflected and radiated back to space. Certain gases absorb or trap energy leaving the earth's atmosphere, and this may in time lead to higher surface temperatures.

The uncertainties in climate modeling are far greater than for ozone study, and much more must be learned before the predictive capability of the models can be relied upon. Current models predict that CFCs would contribute less than 20 percent of the total greenhouse effect over the next several decades.

Current and Future Needs

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The NASA report makes clear that more research is necessary. Recommendations include:

■ Continuing laboratory studies of nitrogen and hydrogen chemistry;

■ Continued search for possible missing chemistry;

Identification and quantification of sources and growth trends for major trace gases;

Improved ground-based and satellite systems to determine ozone and temperature trends more accurately;

■ Continued efforts to develop two- and three-dimensional models with interactive chemistry, dynamics and radiation. In short, the Alliance agrees with NASA's recommendation that more and better information is needed. This can best be obtained by pursuing a balanced strategy of laboratory measurement, atmospheric measurement and modeling of the atmosphere.

In Summary ...

Chlorofluorocarbons, because of their utility, safety and unusual combination of desirable properties, have become important in nearly every aspect of modern life. To restrict their production and use would be detrimental to the public interest.

The Alliance for Responsible CFC Policy believes:

 \blacksquare In the absence of more compelling scientific evidence that CFCs present a hazard to the environment, further regulation is unwarranted at this time.

Research into the scientific questions raised by the ozone depletion and "greenhouse effect" theories should be diligently pursued by the industry and government.

■ There is ample time for the needed research, and any threat can be detected before any significant harm is done to the environment.

■ Research should include studies of other substances that may affect the stratosphere, not just CFCs.

Since computer model calculations of the theoretical effects of CFCs on ozone have been inconclusive and ever-changing, they do not constitute a sound basis for regulation. Actual measurements in the stratosphere are also a necessary part of the decision-making process.

■ Ozone depletion, if it occurs, would be a global issue, so international cooperation should be enlisted for the scientific studies and assessments. If the studies indicate regulatory action is needed, it should be taken in concert with other nations, not unilaterally.

 \blacksquare If scientific findings should prove regulation of CFCs is necessary, the regulations should be based on a balanced assessment of risks and benefits from CFC use, with due consideration given to risks from the use of known alternative compounds.