

## Bevacqua, Frank

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**From:** Les Alm [LALM@boisestate.edu]  
**Sent:** Tuesday, February 08, 2005 12:54 PM  
**To:** Bevacqua, Frank  
**Subject:** Re: FW: Feb. 28 deadline for public comment on2004ProgressReport on US-Canada Air Quality]

**Attachments:** ReportAQA.doc



ReportAQA.doc (41  
KB)

Frank:

Attached is a more comprehensive version of my comments on the 2004 Progress Report.  
Regards, Les

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February 8, 2005

Secretary, United States Section  
International Joint Commission  
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Suite 100  
Washington, DC 20440

Hello:

Following are my comments on the "2004 Progress Report on the United States–Canada Air Quality Agreement." I have tried to put my comments in the context of a survey I completed in January and February of 2003 (see number 5 below) of scientists in Canada and the United States working on the issue of acid deposition. I hope you find my comments useful.

Please note that I have also sent a copy of my comments to the Secretary, Canadian Section, IJC.

*1. Has the Agreement been successful?*

In my opinion, the Agreement has been a success. While there is still a long way to go, the Air Quality Agreement has institutionalized a way for the United States and Canada to ensure that each country is following their domestic policies regarding reduction of cross-border pollution.

- The spirit of the framework established by the AQA is also seen in the establishment of The Commission for Environmental Cooperation (CEC) that was created under the auspices of the North American Agreement on Environmental Cooperation (NAAEC) such that the countries involved focus upon "cooperation and public participation to foster conservation, protection and enhancement of the North American environment." I believe that the Progress Reports represent a fair effort to highlight the cross-border pollution reduction policies of Canada and the United States in a forum that brings legitimacy to the cooperative process and shines light on not only the results but also the process in place. It is important to have such a check on each country's progress so that there is a benchmark from which to compare and critique where we are at in reducing cross-border pollution.
- A weakness in the report is its failure to address the status of U.S. policies vis-à-vis President Bush's "Clear Skies" proposal and the projected massive cuts in funds to support the U.S. Environmental Protection Agency and environmental protection in general. I understand that President Bush's proposals have not been put in place at this time (although many consider adjustments in the regulatory policies as weakening pollution reductions) and that the massive cuts have not occurred. Having said that, the Bush administration's direction is clear (no pun intended)

and it would have been nice to see a detailed analysis of where we are heading in that regard, especially with respect to mercury pollution (a growing concern). Even if President Bush's proposal does not make it through Congress, the general movement to weaken the domestic pollution reduction regulations regarding utilities (the largest producers of sulfur dioxides in the U.S.) will have serious consequences to the goals of the AQA and should be addressed in a more comprehensive manner in the Progress Report. Essentially ignoring these realities puts a much too rosy slant on where we are heading.

## *2. Are there other transboundary air quality issues in need of assessment?*

There needs to be a more in-depth look at NO<sub>x</sub> and where we are heading in that regard. So much of what I read says that scientists in both Canada and the United States believe that the gains made in reducing sulfur dioxide may soon be offset by increases in nitrogen oxides such that acidity (pH) is not improving (at least in sensitive areas).

- Survey results point to several areas where the Progress Report could present a more comprehensive analysis. The survey results showed that scientists are becoming more and more concerned about the progress of reducing acid rain pollution. An overwhelming number of scientists believed that the emission targets set by the current acid deposition control programs in North America will not protect sensitive ecosystems, that nitrogen oxides are undermining the benefits of controlling sulfur dioxide emissions, and that a cap-and-trade allowance system should be put in place for nitrogen oxides. The AQA focus is on results and gives short shrift to the concerns listed above, especially the concern by scientists that the present policies are not sufficient. Coupled with the fact that funds are being cut for the study and monitoring of acid rain pollution, the prognosis for future reductions may not be as optimistic as the conclusions of the Progress Report.
- For example, on pages 1-3 of the 2004 Progress Report, the Canada section uses a footnote to emphasize the fact that the relative importance of nitrogen deposition is expected to increase, while the United States section emphasizes the reductions in sulfur dioxide with no mention of nitrogen oxides. Plus, the U.S. section on nitrogen oxides (page 4) makes no mention of a concern that the relative importance of nitrogen oxides is expected to increase. This portrayal matches the concern that scientists (both Canadian and American) shared with me in the survey. While this may seem a small or "picky" difference, it highlights the fact that scientists are concerned that we may not be taking nitrogen oxides seriously enough.
- Survey results show that both Canadian and United States scientists think that cross-border cooperation is strong and is one of the truly good things about the linkages the AQA has set up. However, there is some concern that there is still too much work going on in each country in isolation of the other; that is, that each country continues to work separately on their pollution problems rather than sharing in the burden.

## *3. Are the Progress Reports useful?*

The Progress Reports keep the acid rain (deposition) issue out in the open and on the policy agenda between the two countries. While producing biennial reports does not match the attention given to issues at the highest level of governments (especially at the executive level), it nevertheless represents an effort to underscore the importance of cross-border air pollution. If one feels, as I do, that we have to be vigilant in keeping important issues on the agenda of both the publics and the governments of Canada and the United States, then the Progress Reports help immensely in maintaining awareness of acid deposition. My research indicates that scientists on both sides of the border are afraid that acid rain is losing its place of importance on the public and governmental agendas while there are serious questions still to be answered. There is also a concern about the lack of funding provided for continued research into the adverse effects of

acid deposition, especially regarding nitrogen oxides. The Progress Reports allow for a public assessment of where we are at and where we are going and hence, provide a means of accountability.

- Survey results also show that a majority of scientists are convinced that acid rain pollution remains a serious problem that will continue well into the future. The concern is that acid rain will fall off the agenda of both countries as other environmental issues take precedence (e.g., climate change). The Progress Reports provide a way to emphasize not only the progress that is being made but keeps the issue of acid rain pollution on the public and governmental agendas. This is no small accomplishment.
- Putting the Canada and United States comparisons side by side is a good way to see differences. Again, my reading and research continues to show that Canada and Canadians pay much more attention to cross-border pollution and the AQA than does the United States and Americans.

#### 4. *Additional comments*

It would be nice if the Progress Report had an INDEX. This would make it much easier read and review.

#### 5. *Survey*

Natural scientists from Canada and the United States were surveyed in January and February of 2003. Scientists were selected to participate in this study based on a single criterion: publication in the last four years of an article in a scientific journal (e.g., *Canadian Journal of Fisheries and Aquatic Sciences*, *Biogeochemistry*, *Freshwater Biology*, *Water, Air and Soil Pollution* and *Atmospheric Environment*) on a subject directly related to acid rain. Library and Internet searches were conducted to obtain the listing of all natural scientists who published an article on acid rain since 1999. From this list of scientists, respondents were randomly chosen from Canada (n = 56) and from the United States (n = 56). The return rate was 73 percent (82/112), with 39 of 56 Canadian scientists and 43 of 56 United States scientists returning questionnaires.

Questions on the survey focused on the continuing importance of acid rain as a serious environmental and transboundary problem and the effectiveness of current policies in reducing acid rain. Respondents were asked questions about the causes and effects of acid deposition, the level of protection provided by current policies, the status of sulfur dioxide (SO<sub>2</sub>) and nitrogen oxide (NO<sub>x</sub>) control measures, the usefulness of cap-and-trade programs, and the adequacy of the present-day funding structure for research involving acid rain. Respondents were also asked to rank (from most important to least important) the atmospheric problems they thought were affecting North America today.

The results and analysis of this survey will be published in an upcoming release of the *Journal of Borderlands Studies*. It is co-authored by Whitney Parker, one of my students at the time.