



STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



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February 3, 2005

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*International Joint Commission

ACTION: FB
INFORMATION: LB, JC, JF, CMNS, Clamen
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Dear Sir or Madam:

SUBJECT: Comments on the Air Quality Agreement Progress Report for 2004

Thank you for the opportunity to comment on the United States (U.S.)-Canada Air Quality Agreement 2004 Progress Report. Given the long common border between Michigan and Canada, we have a vested interest in successful achievement of the commitments contained in the Agreement. The report indicates that the commitments outlined in the Acid Rain Annex and Ozone Annex are being met and that significant progress has been made to reduce emissions that contribute to acid rain and ozone. Collaboration on technical topics also appears to be successful. The assessment of particulate matter is especially important given the recent nonattainment designations that were made in the U.S. and the subsequent attainment strategies that now must be developed. As suggested, our comments will address the following questions:

Do you feel the Agreement has been successful?

When measured against the commitments made, the Agreement has certainly been successful. The ozone and acid rain problems have not been eliminated. However, emissions of pollutants that contribute to these problems have been reduced in a manner agreed to by both countries. This Agreement continues to provide a mechanism to cooperatively plan to achieve air quality standards in border areas such as those in Michigan.

Staff of the Michigan Department of Environmental Quality (MDEQ) participated in the U.S.-Canada Border Air Quality Strategy Pilot Project for the Detroit-Windsor area. The final report for this pilot is due next spring. We have developed relationships while working on this project that will last for years to come. This pilot project set in motion a mechanism to share information related to inventories, monitoring technology, health effects data, etc. We look forward to working with our counterparts at Environment Canada, Health Canada, and the Ontario Ministry of Environment when developing strategies to meet the 8-hour ozone and fine particulate standards.

Are there other transboundary air quality issues that should be addressed throughout this Agreement?

In addition to the primary focus on acid rain (Annex 1) and ozone (Annex 3), this Agreement has led to information sharing and research related to particulate matter, emissions inventory trends, air quality measurements, health effects, and other topics. It is important

that air quality data and emission inventories are generated in both countries in a compatible manner so that the data can be easily compared. The efforts initiated in this Agreement will help to assure that and should be continued.

In Michigan, the area that violates the fine particulate standard is localized. However, there is a significant regional component to fine particulates and it is likely that regional control strategies will be necessary to achieve the standard. The efforts initiated during the Detroit-Windsor pilot project will help to provide coordination of regional strategies.

Mercury deposition is another focus area that could be considered.

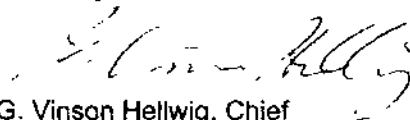
Are the progress reports useful?

The MDEQ staff has only been able to participate in the Agreement in limited areas. These include participation in the U.S.-Canada Border Air Quality Strategy Pilot Project for the Detroit-Windsor area and participation in the June 2004 meeting in Canada to review progress in implementing the Ozone Annex. We also participated in conferences on health effects. The progress reports are useful to track the status of elements of the Agreement in which we are not actively involved.

An important outcome of this Agreement is that governments in both countries are now working together to improve the air quality in the airshed that spans both countries. We have established personal relationships and procedures that will facilitate information sharing and joint participation in developing control strategies. This will greatly benefit our work to improve the air quality in the Detroit-Windsor area and other border areas.

Thank you again for the opportunity to comment. Please contact me if you have any questions.

Sincerely,



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cc: Mr. Steven E. Chester, Director, MDEQ
Mr. Jim Sygo, Deputy Director, MDEQ
Ms. Barbara Rosenbaum, MDEQ
Mr. John Schroeder, MDEQ