

# The Georgian Bay Association



Founded 1916

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Dear Commissioners:

## Re: 2004 Progress Report on Activities Under the 1991 Canada-United States Air Quality Agreement

The Georgian Bay Association (GBA) has been involved in air quality monitoring work for a number of years and we presented verbal comments on the 2004 Progress Report at your Hearing held recently in Toronto when Commissioner Blaney was present. Our membership regularly expresses concern for the decline of air quality at their cottages where they should be free of poor air quality in areas where there is minimal local sources. Our membership is binational with about 40% American membership. So our interest in attempting to reduce sources of air pollution is truly binational.

GBA's primary interest is in the Keep Clean Areas Clean programs which includes visibility, acid deposition, smog (ozone and fine particulates, air quality reporting) and effects on human health and vegetation. We consider the Georgian Bay area a pristine area and are very concerned the air quality is degrading due to pollution transported from the populated and developed areas in southern Ontario and the mid and eastern US.

GBA supports the extensive programs and plans under the agreement and is pleased to have the opportunity to provide input to the 2004 Progress Report.

Comments:

### 1. Conclusions

There is no air quality monitoring data or health effects data to support the concluding statement, "Human health and the environment have benefited greatly from progress made under the US-Canada Air Quality Agreement." This is speculative.

IJC / CMI OTTAWA

ACTION: EAB

INFO: Chair Gray / Clamen  
P.F.K. / JW / Bevacqua

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FILE / DOSSIER

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Distribution

Action:

Info: LB, FB, CMRS

File:

2. Acid Rain

• Visibility

Where is the 2004 CI/KCAK Guidance Document?

Canada should have a visibility monitoring program

Where can one obtain the proceeding of the Feb 2004 IJC Workshop

• SO<sub>2</sub> Emissions

The Banking of SO<sub>2</sub> emissions credits one year and then emitting them in subsequent years is not in the spirit of overall emissions reductions

• Acid Deposition

The report states that further emissions reductions are needed for water, soils etc to recover. Emissions trading may not reduce these emissions reductions (release of banked emissions credits) and would hamper the needed ecosystem recovery from acid deposition.

3. Ozone Annex

• Weak Wording

This section contains weak wording on actions and plans, and contains confusing rhetoric.

- "BC is preparing to propose regulations ..."

- "the guidance will provide national guidance..."

- "Canada intends to monitor market uptake ..."

- "Publication of the final guideline will be considered..."

• Program Evaluations

This section contains a lot of commitments and programs, but no procedure to evaluate the effectiveness or success of these programs.

• Weak Commitments

Jurisdictions have been developing implementation plans since 2001. Will they really be published in 2005 as claimed, and will they be realistic in meeting the CWS deadlines of 2010 and 2015? It is difficult to believe the statements made as the actions seem to always fall short of what is needed.

4. PEMA Emissions

• NPRI Emissions

NPRI emissions for NO<sub>x</sub> and VOC are not accurate enough to make the statements the report makes. If you have to say something, at least state that NPRI data is unverified data.

5. Reporting Air Quality/Air Quality Efforts/Research Cooperation

• Air Quality

- Extensive monitoring networks are needed to evaluate the effectiveness of all the emissions reduction programs and initiatives.
- Air quality data publication is too slow to evaluate and manage reductions and meet the deadlines. 3 years is too slow.
- No observable reductions of Canadian VOCs and NOx emissions.
- Real-time ozone modeling and prediction is good.

• Research

- The transboundary PM evaluations and conclusions are based on databases that are too small, only 1 to 4 years of data
- The report states that PM<sub>2.5</sub> can be high in the Windsor-Quebec Corridor – it can also be high north of this corridor and extend to Georgian Bay and the Muskoka lakes. Why is this area being ignored and why is there no data from the monitors at Parry Sound?

6. Health Effects

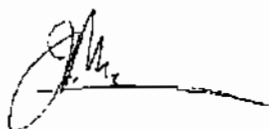
We encourage the good science in identifying health impacts of fine particulates. We would also like to see research done on the health effects of the manganese present in Canadian gasoline. When manganese was reviewed by Environment Canada it was only assessed for health effects when ingested. But as a known neurotoxin its health effects when inhaled need to be assessed. Our membership use marine outboard motors for access to their properties and so their exposure to inhaled manganese from gasoline engines would be higher than from any other form of transportation. The IJC could take a leadership role and begin that badly needed research. Dr. David Bates of the University of British Columbia is familiar with the health effects of inhaled manganese.

7. Forest Effects

- The section on the 2004 Canadian Acid Rain Assessment description is confusing and poorly written. We don't understand what it is saying!
- The FACE site in northern Wisconsin has deciduous trees (aspen, birch, maple). A similar site on the Canadian Shield with coniferous trees/lichens/ mosses etc. is needed in Canada.

Thank you for your interest in air quality concerns. We look forward to your responses to our concerns. If you wish to discuss these comments please contact either Peter Piersol at 905 822-4120 Ext 545 or email [ppiersol@ortech.ca](mailto:ppiersol@ortech.ca), or Mary Muter at 416 489-8101 or email [mmuter@sympatico.ca](mailto:mmuter@sympatico.ca).

Sincerely



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President

c.c. Ontario Medical Association