



College of Social Sciences and Public Affairs

Department of
Public Policy and Administration

January 2, 2007

Elizabeth Bourget

IJC

ATTN: Air Quality Comments

1250 23rd Street, NW, Suite 100

Washington, DC 20440


Hello:

Please accept the following comments regarding the 2006 AQA Progress Report.

1. A fine publication. For those of us in the environmental policy field, it is a wonderful source of information.
2. Would be nice if there was consistency in the baseline year. Throughout the report there is reference to U.S. comparisons based on 1990 levels and 1980 levels and Canadian comparisons based on 1990 and 1994 levels. Not using the same baseline year can be very confusing and misleading when one speaks of percent change, especially when these changes are used to show progress.
3. U.S. section on NOx is quite brief, especially compared to Canada section (see pages 3 and 4). Scientists continue to talk about how important NOx is to reducing pH levels and yet the focus remains on SO2 (probably because that is where the most improvement has come). The emphasis (see page 51) on the fact that despite the reductions in SO2, pH levels (in some places) are not changing shows the complexity of acid deposition and also says we probably should not put too much emphasis on one contributor (SO2), especially considering the fact that the reductions are "insufficient to achieve full recovery" (see page 58).
4. General statements like on page 4: "National experts from both countries are collaborating to determine consistent common uncertainty limits for future analyses" are just too broad without some more information. What is taking so long? When may we expect these? Kind of a "feel good" statement without much support.
5. It is clear that the focus remains on the eastern part of both countries. Why should anyone not from the eastern regions care about acid deposition?
6. The focus on vehicle efficiency is nice, but there are no data on the increasing number of miles being driven. Just increasing MPG may not be the answer and making that case for efficiency without looking at miles driven is problematic.
7. Listing of critical program elements (top of page 36) are kind of "pie in the sky" stuff without some discussion of the probability of these happening (which I would guess is slim).

8. Emphasizing the differences/contrasts between sources of pollution in Canada and the U.S. is well done.
9. There seems little (if any) connection of the reduction of sulfur dioxides and nitrogen oxides to global warming (climate change). Would be very nice to have some discussion of how these are linked.
10. Statement on page 63: "This report concludes that while much has been accomplished to reduce the impact on human health and the environment, the problem of acid deposition is not yet fully resolved." Would be nice to have some estimate about how close we are to resolving this.

Sincerely,

A handwritten signature in black ink that reads "Leslie R. Alm". The signature is written in a cursive, flowing style.

Leslie R. Alm
Professor