Fraser Valley Regional District

8430 Cessna Drive, Chilliwack, B.C. V2P 7K4
Phone: 604-702-5000 Toll Free: 1-800-528-0061
Fax: 604-792-9684 website: www.fvrd.bc.ca

February 28, 2003

Secretary, Canadian Section
International Joint Commission
234 Laurier Avenue, West
22nd Floor
Ottawa, Ontario K1P 6K6

Secretary, United States Section
International Joint Commission
1250 23rd Street, NW
Suite 100
Washington, DC 20440

Dear Sir/Madam:

Re: Comments on Canada – United States Air Quality Agreement 2002 Progress Report

By way of background, the Fraser Valley Regional District (FVRD) is a federation of municipalities and electoral areas that provide essential municipal services to its members. It is situated in the heart of the Lower Fraser Valley in southwestern British Columbia and its member municipalities include Abbotsford, Chilliwack, Harrison Hot Springs, Hope, Kent, and Mission, together with eight unincorporated electoral areas along the Fraser River stretching from Mission to Boston Bar. Population of the FVRD is about 230,000, 90% of which is situated in Abbotsford, Chilliwack and Mission.

The FVRD shares an airshed with the Greater Vancouver Regional District and Whatcom County in Washington State. This airshed is generally in the shape of a funnel, with its widest part at the Pacific Ocean and its narrowest part at Hope, B.C., at the eastern end of the Fraser Valley. It is bordered by the Coast Mountains to the north and the Cascade Mountains to the south.

Wind patterns in the airshed are dominated by easterly or southeasterly flows at most times of the year. However, the summer period can be characterized by a sea breeze effect in which winds blow inland (to the east) during the day followed by a reversal in direction at night (to the west). Another phenomenon is the occurrence of temperature inversions which can create a lid on the airshed and limit the ability of pollutants to disperse.

These geographic and climatic aspects of the valley result in trapping of emissions as they are generated, producing a build-up of pollutants such as ozone and fine particulate. In times of poor ventilation, multi-day low ventilation episodes can occur during which daily emissions tend to accumulate and cause high air pollution levels until they are dispersed by incoming winds. This unique situation makes the Lower Fraser Valley one of the few regions in Canada where air quality is a major concern.

The FVRD is concerned about air quality in the Lower Fraser Valley considering the growing body of knowledge about resulting health and other impacts. The District was granted authority by the Province of B.C. in 1992 to engage in air quality planning and in 1998 the Board of Directors of the FVRD adopted an Air Quality Management Plan. In accordance with this authority, the FVRD has been involved in a number of initiatives to reduce air pollution in the Valley. However, the effectiveness of these initiatives could be affected by new or modified cross border emission sources.

FVRD staff are currently developing an air quality regulation and enforcement strategy for adoption by the Board of Directors. This new authority will augment the air quality planning work that the FVRD has been undertaking for the past 10 years by allowing for its direct implementation.

The FVRD and the City of Abbotsford have reviewed the 2002 Progress Report on implementation of the Canada-US Air Quality Agreement and the FVRD Air Quality Committee, a committee of political representatives from the regional district, has endorsed the following comments.

- The information developed through ongoing implementation of the Ozone Annex is noted. However, this work is only being carried out for the transboundary region encompassing southern Ontario and southern Quebec in Canada, and 18 northeast states and the District of Columbia in the US. Cross border air pollution is also a vital issue for residents of the Fraser Valley. FVRD staff are participating in the Georgia Basin/Puget Sound International Airshed Strategy development work and the FVRD strongly urges the governments of Canada and the United States to amend the Ozone Annex to include the Lower Fraser Valley airshed as a transboundary region in 2004.

- Electricity production plants are identified in the progress report as one of the most important sectors for emission reduction. In recent years, the volatile price of electricity in the western states and provinces has sparked dozens of

proposals for new thermal power plants, the emissions from which will threaten the sensitive Lower Fraser Valley airshed. Ongoing local opposition to the Sumas Energy 2 power plant proposal is indicative of the concern for air quality in the region. The importance of this sector should be underscored as a reason for inclusion of this region in the Ozone Annex.

- As the Fraser Valley is a recipient of emissions from Whatcom County, cumulative impacts associated with new projects relative to existing activities should be assessed. As noted above, the FVRD and its members are endeavouring to improve air quality in the region, but these efforts will be weakened if new and expanded sources in the US are built and the resulting emissions are allowed to impact the Lower Fraser Valley airshed.

- Results of the Pacific 2001 air quality study should be included as information for the Parties when considering whether to add the Georgia Basin/Puget Sound area as a transboundary region. While few results are currently available, this study will provide valuable information to better characterize the airshed and should be evaluated by the GB/PS International Airshed partnership.

- While actions to achieve the ambient air levels for particulate matter and ozone were adopted by the Canadian Council of Ministers of the Environment (CCME) in June, 2000 as Canada-Wide Standards, the included policies for "keeping clean areas clean (KCAC)" and "continuous improvement (CI)" have not yet been defined in terms of their application and consistency with the concept of Prevention of Significant Deterioration (PSD) in the US. The fact that Canada does not yet have an equivalent process was a concern identified by the parties in the 1996 Progress Report, and that concern continues in the latest report. The 2002 progress report indicates that KCAC and CI strategies are currently being developed by Canadian authorities, but they should be promulgated as soon as possible so that they can be included in Ozone Annex negotiations.

- The science around health effects related to fine particulate matter and ozone should be considered directly when negotiating new international commitments for reduction of these parameters. Analysis of health research studies now indicates that there is no "safe" ambient air level for these contaminants for which there are no health effects. Therefore, health concerns should be paramount when considering cross border emission impacts.

- The progress report acknowledges that fine particulate is a problem and consideration is being given to developing an Annex, similar in concept to the

Ozone Annex. A report by the Parties is due by the end of 2003 which will become the basis for such a decision. Considering the growing importance of fine particulate matter and its related health impacts, the FVRD supports this initiative.

- Far more emphasis should be placed on visibility impacts, particularly in the Lower Fraser Valley where the "white haze" phenomenon is a very important concern for residents. This visibility impact is due to fine particulate ($PM_{2.5}$) and it should be included as a parameter of concern when negotiating inclusion of this region in the Ozone Annex.

- Air quality impact assessment of projects in close proximity to the border, whether in US or Canadian jurisdiction, should be equivalent and comprehensive rather than focusing more on one than the other. Current requirements for evaluating emission applications for new or modified sources are focused primarily on the impacts in the country where the source is located. Cross border impacts may be considered, but not to the same degree as in the host country. Harmonization of assessment requirements is needed to ensure that air quality is protected in the entire impact area.

Thank you for the opportunity to comment on the 2002 Progress Report. It is a particularly helpful as a summary of recent activities by both countries to address international air pollution issues.

Yours truly

Patricia Ross, Chair
Air Quality Committee