



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



February 25, 2004

Paul Miller
Commission for Environmental Cooperation
393, rue St-Jacques Ouest, Bureau 200
Montreal (Quebec) Canada H2Y 1N9

Dear Mr. Miller:

Thank you for the opportunity to provide comments on the Long-term Strategic Framework for Air-related Activities recently posted by the Commission for Environmental Co-operation on its web site. My comments here are brief and intended to strengthen the Commission's air quality program.

I understand that the working group is comprised of the environmental agencies from the three Federal governments in Canada, the US and Mexico. While international cooperation and collaboration at this level is important, it is equally important that the Commission remain responsive to public and non-Federal government stakeholders, i.e. State and Provincial governments. Also, the deliberative process undertaken by the air quality committee will be enhanced by seeking public input in developing its advice on Commission air activities. This, however, needs to recognize that the Commission must remain responsive to direct public input on its activities in a meaningful way in addition to and apart from a working group composed of only federal government officials. Understanding the need for efficient and effective allocation of resources, and providing strategic opportunities for the public can increase overall understanding about the Commission and strengthen its credibility as a North American institution directly responsive to public concerns.

One specific area of comment relates to power plants. This source category is of particular interest to the Northeastern United States and Eastern Canada. Transport from Midwestern power plants continues to impair our ability to attain and maintain compliance with Federal air quality standards. I was therefore pleased to see the Commission's work on reporting and inventorying power plant emissions. This work is beneficial to us and I would like to see it continue and expand, particularly in the area of mercury. Many lakes and rivers in Connecticut [and most other NE states] have fish consumption advisories posted because of mercury transport. Increasing the understanding and precision of this information will help us to better address this problem.

Finally, from review of the framework, it appears one attainable objective would be to focus on assessment and comparability of the air quality monitoring networks in each of the three countries. This could assist to improve data quality and consistency and links to other issues of importance to the three countries, such as security and terrorism.

Should you have any questions, please feel free to contact me at 860 424 3688.

Sincerely,

Christopher A. James
Director
Air Planning and Standards Division

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