

November 26, 2012

Laura K. Furgione, Acting Director
National Weather Service
National Oceanic and Atmospheric Administration
1325 East-West Highway
Silver Spring, MD 20910-3283

Re: Proposed Termination of National Weather Service Ozone Air Quality Predictions

Dear Ms. Furgione:

The Northeast States for Coordinated Air Use Management (NESCAUM) are responding to the National Weather Service's (NWS) Public Information Statement, Comment Request, published on Tuesday October 23, 2012, and entitled: "Proposed Termination of NWS Ozone Air Quality Predictions."¹ NESCAUM is the regional association of air pollution control agencies representing Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont.

We understand that, due to budgetary constraints, NWS proposes terminating all ozone and fine particulate matter (PM_{2.5}) forecasts, beginning the first quarter of 2013. These forecasts are operational and experimental ozone air quality predictions, and developmental predictions of PM_{2.5} produced using the Community Multi-scale Air Quality Modeling System (CMAQ) at the National Centers for Environmental Prediction.

NESCAUM is concerned about the negative public health impacts of this proposed action, and urges the NWS to maintain these forecast products. State air quality programs are required under the federal Clean Air Act to conduct certain duties to protect public health. This includes issuing daily public forecasts of the air quality index (AQI), and air quality health advisories when appropriate. These forecasts and advisories are based on expected ozone and PM_{2.5} air quality in their jurisdictions. The NWS ozone and PM_{2.5} forecast products are a core component of the northeast states' AQI forecast toolbox.

Since 2011, the NWS ozone forecast has been the most reliable product from among the suite of models used to forecast ozone air quality, and is considered to be the "Gold Standard" by NESCAUM member agencies. While other ozone forecast products are available, they are either

¹ See: http://www.nws.noaa.gov/om/notification/pns12ozone_pm2.5removal.htm.

costly proprietary models, research model results that are not available in time for operational forecast deadlines, or other less validated models on the web.

The high spatial resolution, ability for regional zooming, clear isopleth map depiction, and the ability to extract site-specific hourly time-series concentrations and vertical profiles are unique valuable features of NWS's air quality forecast products, as are the smoke, dust and regional HY-SPLIT trajectory forecasts. Additional insights are provided when forecasters can contrast multiple model results to evaluate model performance and to evaluate causes of historical pollution events.

Proposed downward revisions to the National Ambient Air Quality Standards for PM_{2.5} and ozone underscore the need to maintain and improve national quality forecasting capabilities. Tighter new one-hour air quality standards for sulfur dioxide and nitrogen dioxide mean that either of these pollutants may drive future daily air quality indices. New multi-pollutant indices, such as the Canadian Air Quality Health Index (based on ozone, PM_{2.5} and NO₂), emphasize the need for better forecasting capabilities for these pollutants.

We recognize that budgets are currently strained at all levels of government. Terminating this service, however, will have adverse public health ramifications. We urge NWS to coordinate with the U.S. Environmental Protection Agency on this important health issue, and work together to ensure that these critical prediction tools can be maintained. Please do not hesitate to contact George Allen of my staff at 617-259-2035 if you have any questions.

Sincerely,



Arthur N. Marin
Executive Director

Cc: Gina McCarthy, Assistant Administrator for Air and Radiation, U.S. EPA
NESCAUM Directors