

**Comments on
Visibility Valuation Section (§9.3.5)
of the First External Review Draft of EPA's
*Integrated Science Assessment for Particulate Matter***

**Public Comments Session
CASAC Meeting
April 1-2, 2009**



INTERNATIONAL

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Vice President**

Comments prepared on behalf of UARG

Main Points in My Written Comments

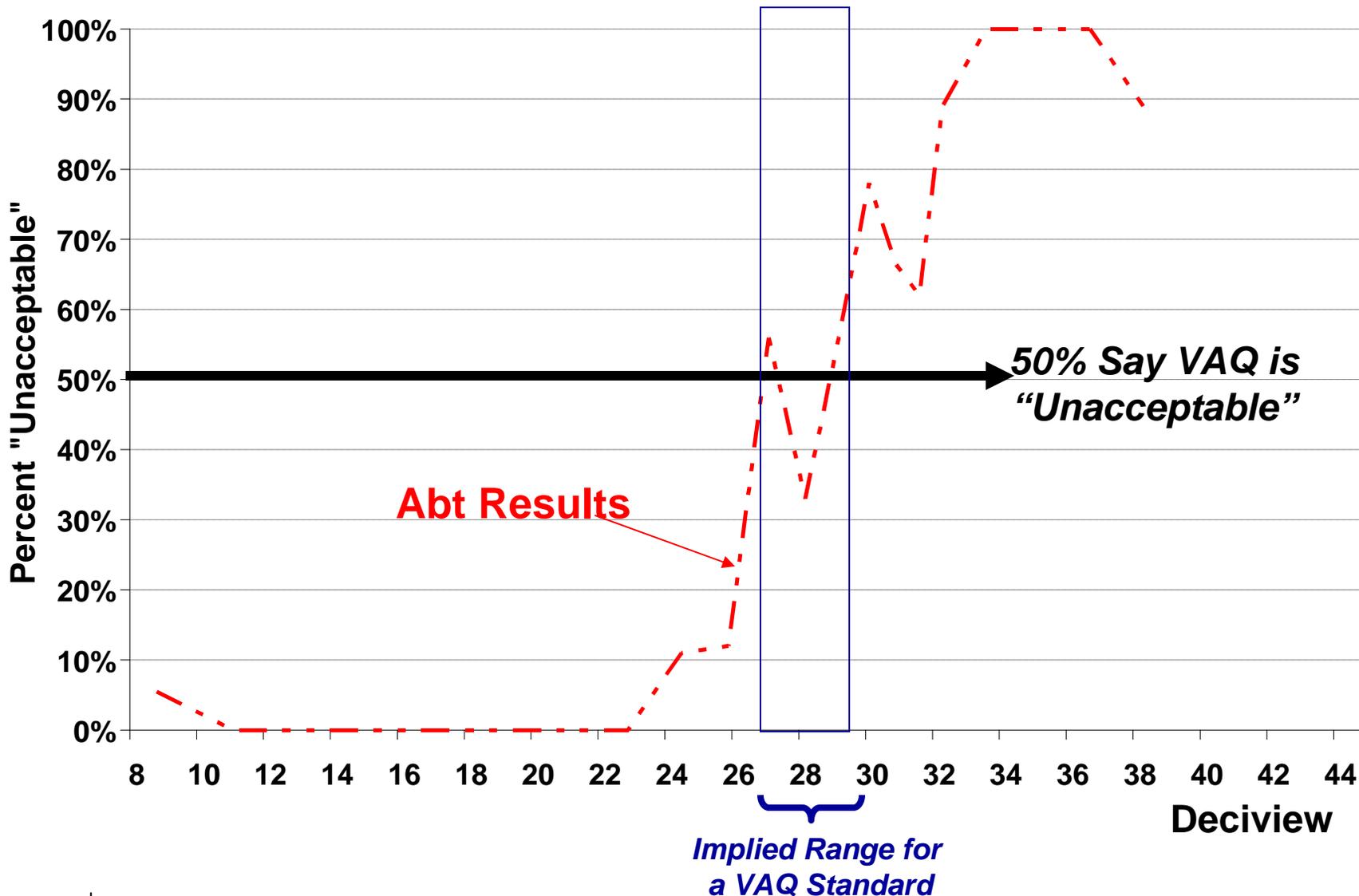
Sole focus of rest of my oral comments

- 1. VAQ Preference Studies do not provide a valid basis for identifying the public's preference for a visibility standard**
- 2. Two new visibility studies reinforce evidence that results of both preference and valuation studies are "contaminated" by people's concerns about healthfulness of air.**
- 3. The new property value study, Beron et al. (2001), cannot justify its claim that it has separated health values from aesthetic values.**
- 4. The ISA should acknowledge another new visibility valuation study, Smith et al. (2005, 2006), which provides additional relevant evidence about the interpretation of visibility WTP estimates based on the contingent valuation method.**

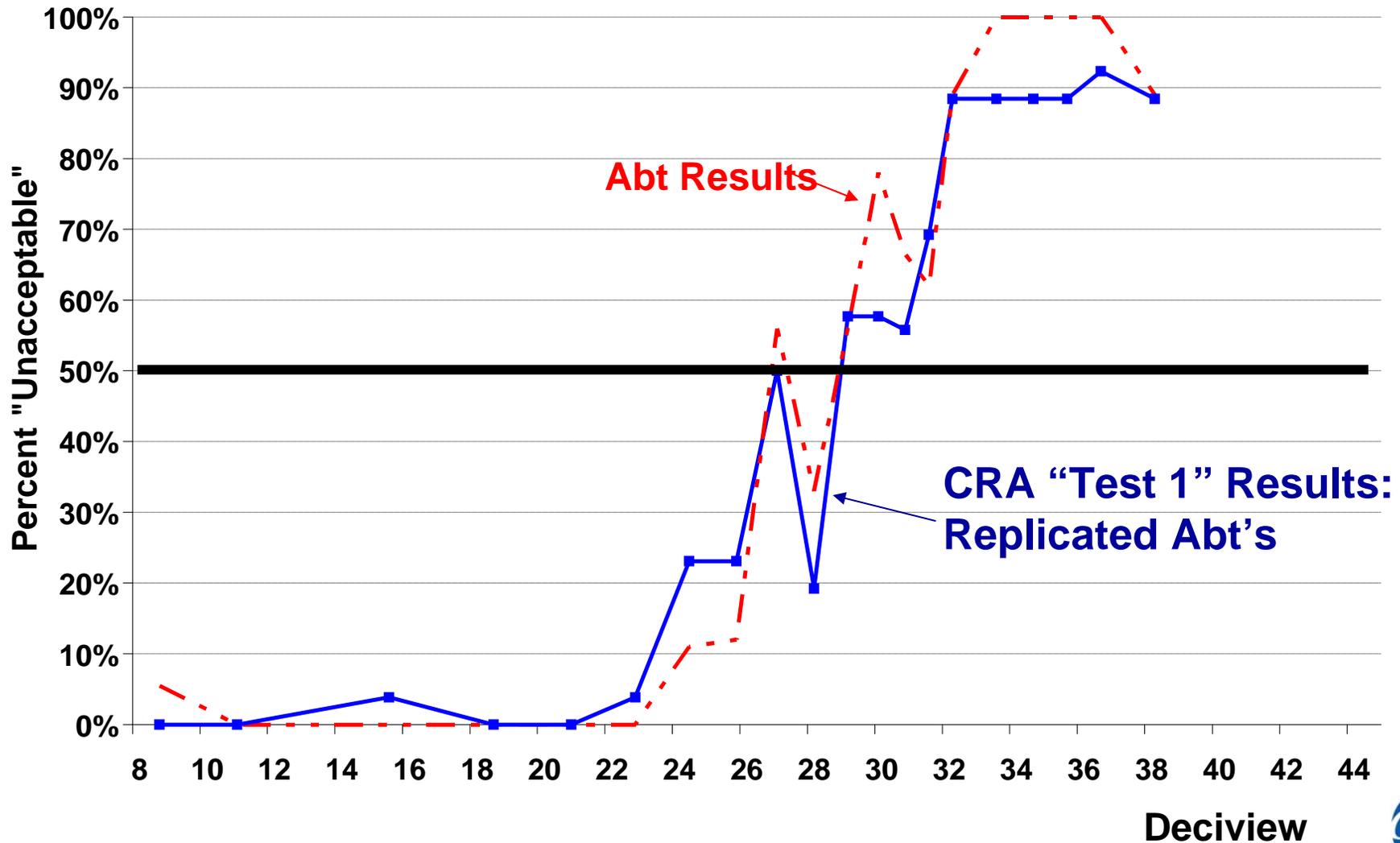
VAQ Preference Studies

- **Method:**
Ask a sample of people to look at photographs of their local area of residence
 - Range of VAQ levels shown in a set of photographs of same vista
 - Ask them to report whether each VAQ level is “acceptable” or “unacceptable”
- **Results:**
Percent who say “unacceptable” increases as VAQ in photographs worsens
- **Interpretation by Authors (and EPA):**
VAQ level that 50% of people say is “unacceptable” should be VAQ visibility standard.

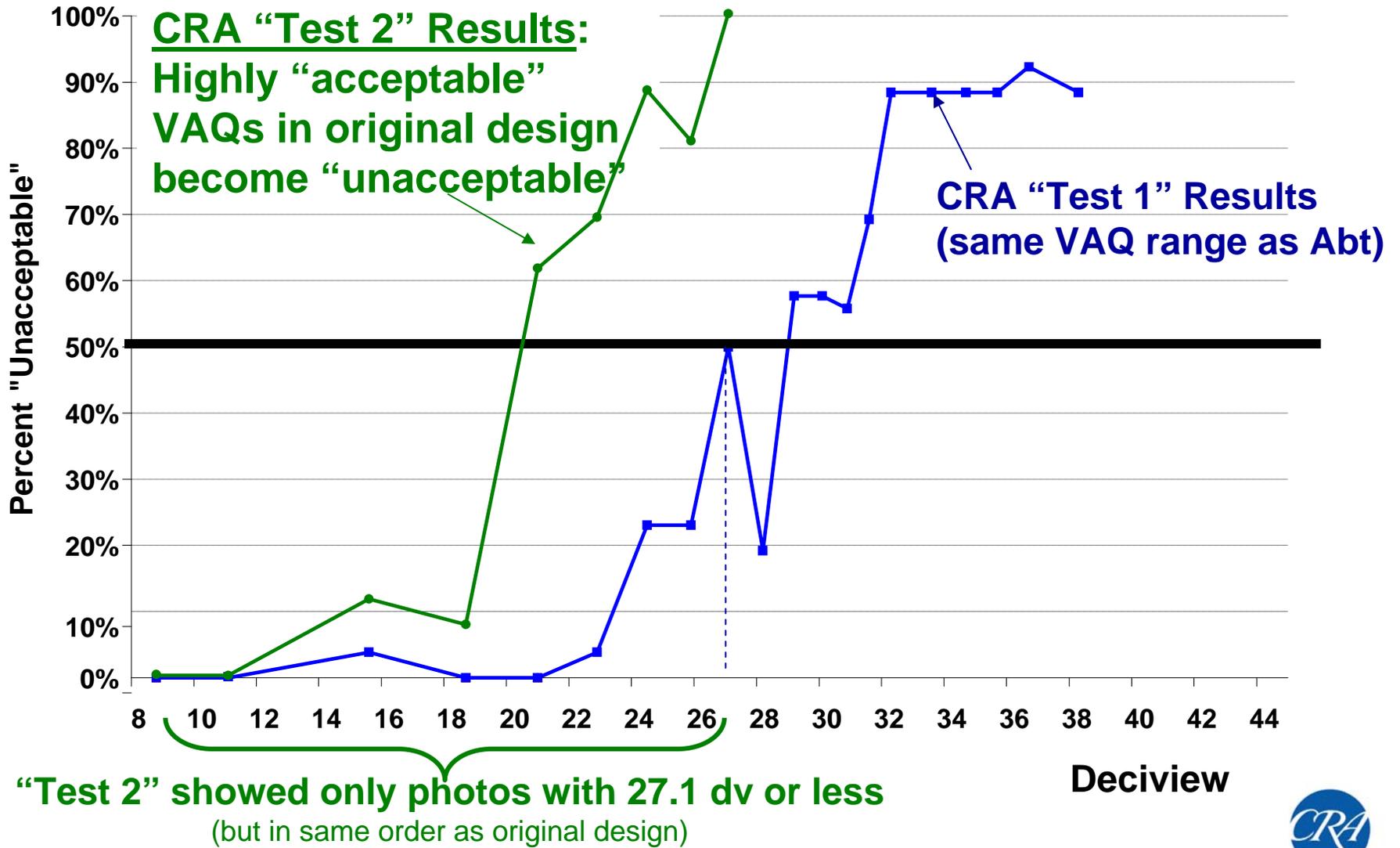
Example of One VAQ Preference Study: Washington DC (Abt Associates, 2001)



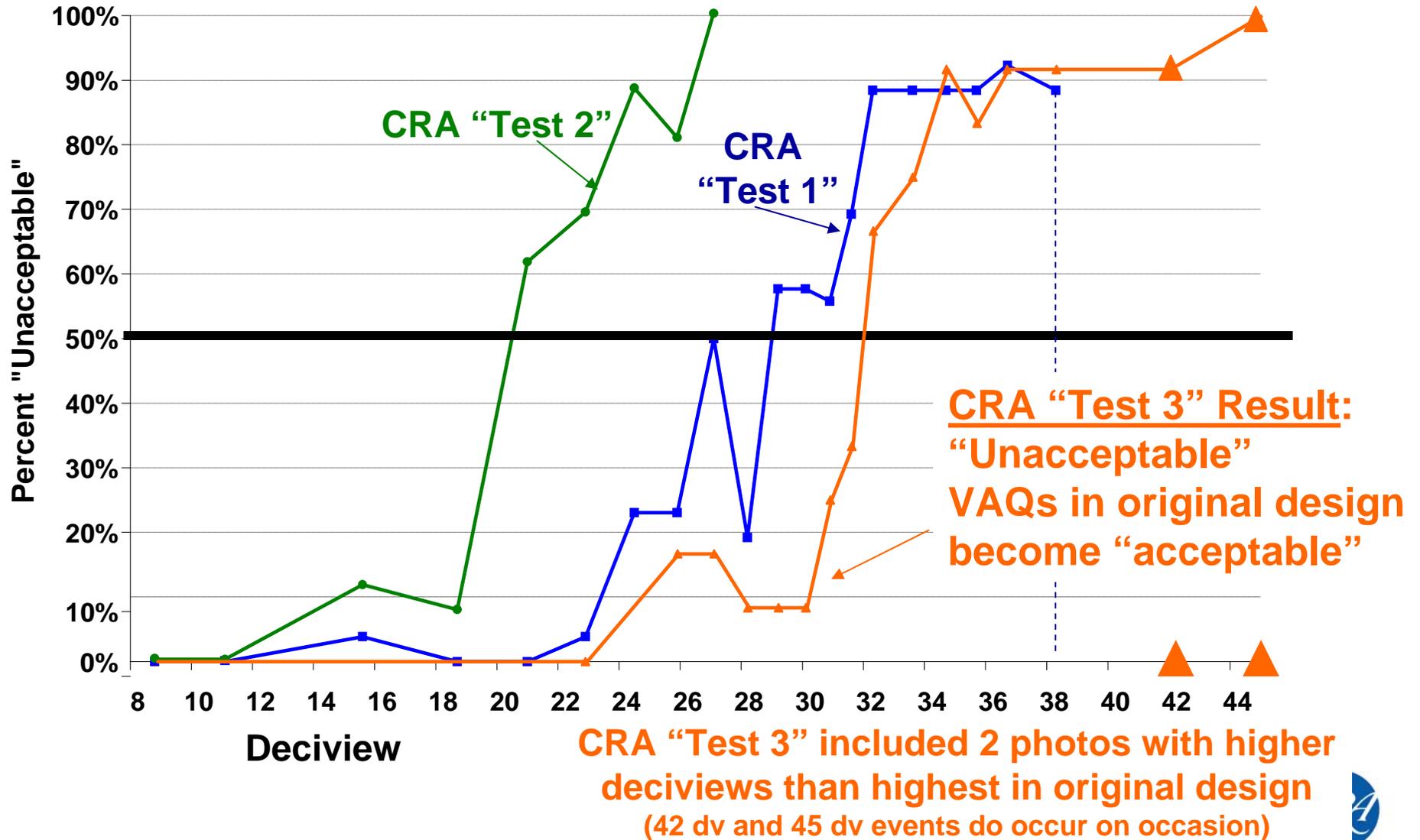
CRA Study's "Test 1" Was Able to Replicate Abt Results -- Same Range and Ordering of VAQ Were Shown



CRA Study's "Test 2" Used Only Photos with VAQs Deemed Acceptable by >50% in Original Survey



CRA Study's "Test 3" Added Two Photos with Higher Deciview Levels Than Highest in Original Survey



Conclusions on VAQ Preference Study Method

VAQ preference study method is not a scientifically valid basis for setting a visibility standard

- **VAQ Preference Studies do not reveal a “credible” or “enduring” judgment about what people’s “own eyes tell them is the cutoff between acceptable and unacceptable VAQ.” ^{1/}**
- **CRA’s research indicates that the preference study method induces people to judge acceptability entirely in relative terms**
 - This calls into question whether an absolute standard of acceptability for VAQ even exists

^{1/} Quote from the original VAQ preference study, Ely *et al.*, 1991, p. 3