

NATIONAL PARK SERVICE BRIEFING STATEMENT

Prepared for: Director
Submitted: July 15, 1997

States: All

Title: Air Resources Management in the National Park Service

Issue: Protection of NPS Natural Resources from Air Pollution

Background:

Clean Air Act (CAA) Amendments of 1977 gave NPS/DOI an affirmative responsibility to protect "air quality related values" -- *i.e., flora, fauna, visibility, odor, geologic resources, soil and water resources, and archeological, historical and other cultural resources* -- from the adverse effects of air pollution from new or modified major sources of air pollution in areas designated as "Class I."

Class I areas are those NPS areas in existence as of August 7, 1977 (date of the CAA amendments) that met the following criteria:

- national wilderness areas and national memorial parks in excess of 5,000 acres;
- national parks in excess of 6,000 acres.

There are 48 NPS Class I areas nationwide.

CAA Amendments of 1977 established a **national visibility goal**: "*...the prevention of any future, and the remedying of any existing, impairment of visibility in mandatory class I Federal areas which impairment results from manmade air pollution.*"

NPS meets its CAA responsibilities through a centralized Washington-level office, the Air Resources Division, established in 1978. A highly specialized team of air quality professionals (engineers, physicists, meteorologists, biologists, attorneys, and environmental specialists) provide assistance to DOI, the Director, Regional Directors, and parks on all air quality related issues-- technical as well as policy.

The Air Resources Division engages in a full range of activities related to the protection of air quality and related values by:

- collecting and interpreting air resource information in parks
- identifying air pollution threats to parks
- assessing the effects of industrial development or other activities
- development and review of federal, state, and local air quality legislation and regulations
- conducting air resource research
- development and application of air quality models
- air quality data analysis and interpretation
- participation in regional air quality partnerships, such as the Southern Appalachian Mountains Initiative (SAMI) and the Grand Canyon Visibility Transport Commission

NPS also reviews permit applications for new sources of air pollution wishing to locate near Class I areas. To date, NPS has reviewed over 500 applications. Whenever the Federal Land Manager (FLM) determines air quality related values will be adversely impacted as a result of the new source, the FLM recommends to the permit granting authority (i.e., states) that the permit be denied, unless the applicant agrees to mitigate its impacts (e.g., by obtaining emissions offsets). In only a few instances (at Shenandoah, Great Smoky Mountains and Denali NPs) has the FLM recommended permit denial.

To help NPS better understand air resource problems, NPS has established nationally recognized monitoring and research programs, including a:

- 38 station fine particle sampling network;
- 18 station optical monitoring network;
- 30 station ozone and meteorological monitoring network;
- 23 station precipitation chemistry (acid rain) network; and
- visibility research program in collaboration with leading research universities.

NPS leverages its financial resources effectively by establishing partnerships with other state and federal agencies, and the private sector to conduct air quality monitoring and research in national parks.

NPS monitoring and research programs are unique and do not duplicate the efforts of other federal agencies. They make a substantial contribution to the state of science of air quality in this country. The public and private sectors and academia rely on NPS data for scientific and regulatory purposes.

NPS works with EPA and States in developing and/or reviewing air quality legislation and regulations to ensure park resources are adequately protected from manmade air pollution.

Status:

The primary air resource problems affecting parks include:

- visibility impairment in the form of regional haze;
- vegetation effects of tropospheric ozone;
- aquatic and terrestrial effects of acidic deposition.

Some parks exceed EPA's ambient health standards for ozone and visitors are warned of high "smog" levels when entering parks (Acadia, Shenandoah, and Sequoia).

EPA is revising New Source Review regulations that will clarify the role of the FLM and will require FLMs to provide additional information to states and permit applicants on air quality related values and the evaluation of adverse impacts. Although generally supportive of the revisions, NPS has concerns about a relaxation of applicability criteria for new permits.

EPA has recently proposed revised standards for ozone and particulate matter. Ozone primary (health) standard was revised downward and should be slightly more protective of park resources than previous standard; however, EPA decided not to set a separate secondary (welfare) standard at

a lower level than the primary which would have afforded more protection to park resources. EPA also set a fine particle primary standard for particulate matter, but similarly opted to not set a separate secondary standard at a lower level.

EPA will soon propose regional haze regulations which NPS hopes will provide added protection to, and improvement of, the visual resources of Class I areas than under current visibility regulations.

NPS air quality monitoring programs are operating on old equipment with decreasing reliability. A \$1 million budget increase is in FY 1998 budget to replace some equipment.

Position of Interested Parties:

Position of states vary significantly depending on the issue and state politics.

Some states and industry groups believe that the FLMs (NPS, U.S. Forest Service, and U.S. Fish & Wildlife Service) have too much discretion with respect to the review of permits near Class I areas, and would like to curtail FLM responsibilities.

Environmental and public citizen groups are generally supportive of NPS position on air quality matters.

Industry groups generally oppose any new regulations for economic reasons.

Department/Bureau Perspective:

NPS seeks "to perpetuate the best possible air quality in parks because of its critical importance to visitor enjoyment, human health, scenic vistas, and the preservation of natural systems and cultural resources...The Park Service will assume an aggressive role in promoting and pursuing measures to safeguard air quality related values from the adverse impacts of air pollution. In cases of doubt as to the impacts of existing or potential air pollution on park resources, the Park Service will err on the side of protecting air quality and related values for future generations." [NPS Management Policies, December 1988].

Although NPS has a responsibility to protect its resources from air pollution effects, it has no authority to require the reduction of emissions from existing sources that may be adversely affecting its resources. NPS must work assertively with states to enact legislation and regulations that would be more protective of park resources. NPS must develop educational programs to adequately and accurately present the air quality problems facing parks to state and national legislators and the general public. NPS must continue its research and monitoring programs to track air quality status and trends in national parks and to understand air pollution cause and effects relationships.

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