



United States Department of the Interior



NATIONAL PARK SERVICE
Interior Regions 8, 9, 10, and 12
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San Francisco, CA 94104-2828

IN REPLY REFER TO:
I.A.2 (PW-NR)

November 23, 2021

Washington Department of Ecology
Submitted to [Public Comment Form](#)
Attention: Linda Kildahl
Department of Ecology
PO Box 47600, Olympia, WA 98504-7600

Dear Ms. Kildahl:

Thank you for the opportunity to review the proposed Washington Regional Haze State Implementation Plan (SIP) for the Second Implementation Period (2018-2028). The National Park Service (NPS) participated in early engagement and federal land manager (FLM) consultation with the Washington Department of Ecology (Ecology) regarding SIP development from 2018 through July 2021. We appreciate the extensive efforts that Washington invested in early engagement and consultation with the NPS as well as responses to our input in the proposed draft SIP. We take this opportunity to reiterate our initial recommendations and request the state share and respond to our formal consultation input of July 29, 2021 in the draft SIP.

Significant opportunities for emission reductions are available that could improve the draft SIP and advance progress toward natural visibility conditions. Specifically:

- Requiring emission controls for the refinery sector in this planning period rather than deferring potential controls to the Reasonably Available Control Technology (RACT) process would directly benefit Class I areas. The SIP process allows for FLM involvement, has more rigor, and achieves results more quickly in comparison to RACT.
- We maintain our recommendation that reasonable, cost-effective controls to reduce haze causing emissions for pulp and paper facilities in Washington are available and should be implemented in this planning period.
- We recommend that Ecology require the maximum level of nitrogen oxide controls that is technically and economically feasible for the glass and cement facilities evaluated.

As we shared in our earlier feedback, the NPS appreciates that Ecology has developed an organized, detailed SIP, and evaluated a reasonable set of facilities contributing to haze in the region. We also recognize that Ecology has made corrections to many of the cost analyses prepared by facilities, demonstrating a commitment to accurate cost effectiveness considerations.

INTERIOR REGION 8 • LOWER COLORADO BASIN*
INTERIOR REGION 9 • COLUMBIA—PACIFIC NORTHWEST*
INTERIOR REGION 10 • CALIFORNIA—GREAT BASIN
INTERIOR REGION 12 • PACIFIC ISLANDS

AMERICAN SAMOA, ARIZONA*, CALIFORNIA, GUAM, HAWAII, IDAHO, MONTANA*,
NEVADA, NORTHERN MARIANA ISLANDS, OREGON, WASHINGTON
*PARTIAL

The NPS manages 48 of the 156 federally designated Class I areas across the country where visibility is an important attribute. NPS-managed Class I areas affected by haze causing emissions from Washington include Mount Rainier, North Cascades, and Olympic National Parks. Haze can significantly diminish the visitor experience in these iconic parks that offer awe-inspiring vistas of glacier capped mountains, old-growth temperate rainforest, and miles of wild coastline.

We encourage Ecology to take timely opportunities to reduce haze causing emissions. The cumulative benefits of emission reductions from many sources are necessary to achieve the Clean Air Act and Regional Haze Rule goal to prevent future and remedy existing visibility impairment in Class I areas. Ecology analyses have identified emission reductions that would make further progress toward this goal. The state has an opportunity to improve the effectiveness of their Regional Haze SIP by choosing to require cost-effective emission controls identified using the four statutory factors. These incremental steps are needed to advance reasonable progress goals.

We appreciate the opportunity to comment and look forward to continued work with Washington for clean air and clear views. If you have questions contact Jalyn Cummings (jalyn_cummings@nps.gov) or Melanie Peters (melanie_peters@nps.gov).

Sincerely,

Cindy Orlando
Acting Regional Director
National Park Service, Interior Regions 8, 9, 10, and 12

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