



United States Department of the Interior

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INTERMOUNTAIN REGION
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Memorandum

Regional Haze
Bryce Bird, Director
Utah Division of Air Quality
P.O. Box 144820
Salt Lake City, UT 84114-4820

Thank you for the opportunity to review Utah's Regional Haze State Implementation Plan (SIP) for the Second Implementation Period. The National Park Service (NPS) participated in early engagement and federal land manager (FLM) consultation with the Utah Department of Air Quality (UDAQ) regarding SIP development from July 2020 through January 2022, submitting written feedback on February 14, 2022. The Clean Air Act (CAA) requires that the state "shall include a summary of the conclusions and recommendations of the federal land managers in the notice to the public" (42 U.S.C. §7491). FLM conclusions and recommendations presented during consultation were not included in the UDAQ notice for this public comment period.

We recognize that the Utah Air Quality Board has requested public feedback on specific topics that we address in the attached Appendix A. We appreciate that UDAQ responded to NPS consultation comments in Chapter 9 of the SIP and provide additional technical responses in the attached Appendix B. The following recommendations represent the views of the NPS and do not necessarily represent the views of the Department of Interior.

Significant opportunities for emission reductions are available that could improve the draft SIP and advance progress toward natural visibility conditions. In summary, we request that Utah:

- Require cost-effective measures to reduce haze-forming pollutants identified through the four-factor analyses in the SIP. Specifically, the NPS encourages UDAQ to take timely opportunities to reduce haze causing emissions from the Hunter and Huntington power plants. Facility-specific recommendations were included in our February 2022 SIP review feedback.
- Correct cost-effectiveness analyses in accordance with EPA recommended methods. Our review finds that current analyses generally inflate the cost of control.
- Establish a cost-effectiveness threshold for reasonable progress that is in line with other states.

- Consider oil and gas emission reduction opportunities in this planning period and include the NPS as a stakeholder in future rule-making processes.

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 Utah include Arches, Canyonlands, Bryce Canyon, Capitol Reef, and Zion National Parks in Utah, Craters of the Moon National Monument & Preserve in Idaho, and multiple areas in Colorado, Wyoming, and Arizona. Haze can significantly diminish the visitor experience in these iconic parks that offer awe-inspiring vistas of dramatic canyons, unique rock formations, ancient sand dunes and arches, and wild rivers.

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. Our review of technical analyses in the Utah draft SIP identifies multiple emission reductions that would make further progress toward this goal. We encourage UDAQ to use the SIP process to reduce haze causing emissions 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 Utah for clean air and clear views. If you have questions, contact Lisa Devore (lisa_devore@nps.gov) or Melanie Peters (melanie_peters@nps.gov).

Sincerely,

Michael T. Reynolds
Regional Director

cc:

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Melanie Peters, melanie_peters@nps.gov, Air Resources Division Regional Haze Lead

Attachments:

Appendices A and B: RSS-NPS Comments on UT Regional Haze SIP Revision 5-2022
IMR_AppAB.pdf
Workbooks: RSS-NPS Comments on UT Regional Haze SIP Revision 5-2022
IMR_Workbooks.zip