

March 30, 2004

Environmental Protection Agency  
EPA Docket Center (EPA/DC)  
Air and Radiation Docket and Information Center, 6102T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**Re: Interstate Air Quality Rule (Docket ID No. OAR-2003-0053)**

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The undersigned organizations urge the Environmental Protection Agency (EPA) to protect the health of American citizens and improve the hazy skies plaguing our national parks by adopting an Interstate Air Quality Rule (IAQR) that achieves deeper and faster reductions in air pollution.

Particulate matter pollution causes significant health problems, placing the elderly, children, and individuals suffering from lung and heart diseases at risk. Particulate matter emitted by U.S. power plants shortens the lives of an estimated 30,000 Americans each year—exceeding the number of deaths attributed to drunk driving accidents or homicides. In addition, power plant pollution triggers hundreds of thousands of asthma attacks and illnesses annually leading to millions of days of missed work.<sup>1</sup>

Recent research suggests that serious health effects are linked to long-term and short-term exposure to particulate matter including irregular heartbeat, heart attacks, stroke, slowed lung growth in children and infant death. Ozone smog—also a byproduct of fossil power—has been linked to a variety of serious health impacts, including reduced lung function in healthy adults, onset of asthma in exercising children, stunted lung growth and even aortic valve defects in children.

EPA must act to reduce the power plant pollution transported across state borders. Although the IAQR documents that interstate air pollution is a major problem, it fails to adequately protect citizens in downwind states. Even with the rule fully implemented, a number of eastern counties will continue to violate federal health standards for fine particle and ozone pollution, long after their respective attainment dates have passed. EPA's failure to adopt a rule that achieves all available pollution cuts as quickly as possible is bad policy and violates the requirements of the Clean Air Act.

Emissions from power plants should be reduced to national levels no less stringent than those expected under the Clean Air Act, equivalent to 2 million tons of sulfur dioxide and

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<sup>1</sup> Abt Associates, The Particulate-Related Health Benefits of Reducing Power Plant Emissions, October 2000. Clean Air Task Force, Death, Disease, & Dirty Power: Mortality and Health Damage Due to Air Pollution from Power Plants, October 2000.

1.25 million tons of nitrogen oxide annually.<sup>2</sup> This will save many additional lives, and will be highly cost effective. We also call on the Agency to require these reductions at an earlier date, in time to allow states a reasonable chance to attain the PM<sub>2.5</sub> and ozone NAAQS on schedule. Earlier reductions are practicable and are required by law.

Transported power plant pollution—largely sulfate particulate matter—also ruins views at some of our country’s most inspirational natural landmarks. According to EPA, sulfates are responsible for about three quarters of the visible haze in the eastern U.S., and in the West a quarter to a half. In 1977, Congress amended the Clean Air Act and established as a national visibility goal “the prevention of any future and the remedying of any existing impairment of visibility” in certain national parks and wilderness areas.<sup>3</sup> More than 25 years later, we are far from achieving this goal. From 1990-1999, the haziest days at Great Smoky Mountains National Park in North Carolina and Tennessee did not improve. They continued to worsen at parks such as Big Bend in Texas, the Grand Canyon in Arizona, and Yosemite in California.<sup>4</sup> While some parks show slight signs of improvement, enormous strides will be needed if these improvements are to be noticeable.

The Interstate Air Quality Rule alone is not designed to protect these public lands. It cannot legally serve as a substitute for the requirements outlined in the Regional Haze Rule, which sets forth visibility goals, progress requirements and milestones. The IAQR will fail to deliver the necessary improvements for us to achieve the congressional visibility goal. Visitors today to our most visited national park, the Great Smoky Mountains National Park (which attracts 9 million visitors and brings an estimated \$1 billion to the local economy annually),<sup>5</sup> can only expect to see vistas across the park averaging 12 miles for the equivalent of two or more months a year. Under estimated natural conditions in the Southeast vistas should reach to 70-80 miles. Further, from the extremely limited analysis that accompanied the IAQR, with proposed IAQR emission reductions fully implemented, views in southeast parks may improve by only a few miles over half a generation. This could not conceivably be considered “reasonable progress” toward restoring views in the Great Smoky Mountains or any other of the polluted eastern parks.

As states develop plans to comply with the Regional Haze Rule, it is entirely appropriate for them to consider the projected reductions from the Interstate Air Quality Rule. However, this cannot excuse states from considering visibility-impairing pollution from all sources and determining the additional reductions needed to restore park views. As a legal matter, states will also still need to identify the power plants and other industries that must install the “best available retrofit technology” (BART). While the IAQR will deliver some of the reductions necessary to improve visibility, states must complete the appropriate technical analyses to determine the amount of additional pollution reductions

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<sup>2</sup> U.S. EPA, “Discussion of Multi-Pollutant Strategy,” Meeting with EEI, September 18, 2001, “Comparison of Requirements Under Business-as-Usual and the Straw Proposal,” pg 10.

<sup>3</sup> CAA§169

<sup>4</sup> National Park Service Air Resource Division, *Air Quality in the National Park, 2<sup>nd</sup> Edition*, July 2001; pgs 14-15.

<sup>5</sup> Ibid, pg 36; National Park Service Visitation Database <http://www2.nature.nps.gov/NPstats/dspAnnualVisits.cfm>.

that will be needed from power plants, industrial facilities, and other sources in order to achieve progress goals required under required regional haze state implementation plans.

The Interstate Air Quality Rule can greatly reduce the fine particles threatening the health of American citizens and obscuring majestic scenery in our national parks. However, it is not a substitute for the carefully crafted procedures and requirements set forth by Congress and EPA to specifically address the problem of regional haze. We urge EPA to take our comments into consideration as you work to adopt a final rule. That rule must be strengthened to meet both your legal obligations and your responsibility to protect the public's health and our environment.

Sincerely,

Please see attached list of 321 signatories

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Friends of the Columbia River Gorge  
Portland, OR

Eban Goodstein/ Executive Director  
Greenhouse Network  
Portland, OR

Ann Vileisis/Conservation Director  
Kalmiopsis Audubon Society  
Port Orford, OR

Amy Hojnowski/ State Representative  
National Environmental Trust (Oregon  
Office)  
Portland, OR

Regna Merritt/ Executive Director  
Oregon Natural Resources Council  
Portland, OR

Maureen Kirk/ Exec. Director  
Oregon PIRG  
Portland, OR

David Monk/ Executive Director  
Oregon Toxics Alliance  
Eugene, OR

Angela Crowley-Koch/ Staff Organizer  
Physicians for Social Responsibility of  
Oregon  
Portland, OR

**PENNSYLVANIA (11)**

Susan Curry/Executive Director  
Alliance for a Sustainable Future  
Ambler, PA

Kevin Stewart/Director of  
Environmental Health  
American Lung Association of  
Pennsylvania  
Lancaster, PA

Joseph Otis Minott, Esq./Executive  
Director  
Clean Air Council  
Philadelphia, PA

Susan Curry/Philadelphia Convener  
Earth Charter Citizens  
Philadelphia, PA

Susanne Seppi/ Director  
Group Against Smog and Pollution  
(GASP)  
Pittsburgh, PA

Lisa Graves Marcucci/President  
Jefferson Action Group, Inc.  
Jefferson Hills, PA

Joy Bergey/Project Director  
Pennsylvania Interfaith Climate Change  
Campaign  
Laverock, PA

Catherine Hammond/Executive Director  
Pennsylvania League of Conservation  
Voters  
Harrisburg, PA

Joy Bergey/Executive Director  
The Center for the Celebration of  
Creation  
Philadelphia, PA

R. John Dawes/ Administrator  
Western PA Watershed Program  
Alexandria, PA

Teresa Mendez-Quigley/Project Director  
Women's Health and Environmental  
Network (WHEN)  
Philadelphia, PA

**RHODE ISLAND (17)**

Art Handy/Director of Advocacy and  
Communications  
American Lung Association of Rhode  
Island  
Providence, RI

Katherine Fisher/President  
Brown University Green Party  
Providence, RI

Sheila Dormody/Director  
Clean Water Action (Rhose Island)  
Providence, RI

Liz Cameron/Driector  
Ecology Action  
Providence, RI

Sheila Dormody/Director  
Environment Council of Rhode Island  
Providence, RI



Rev. Mary Hitt  
Episcopal Diocese of Rhode Island  
Providence, RI

Laura Landen/ Coordinator  
Friends of the National Wildlife Refuges  
of Rhode Island  
Charleston, RI

Greg Gerritt/Secretary  
Green Party of Rhode Island  
Providence, RI

Bill Shuey/Director  
International Institute of Rhode Island  
Providence, RI

Rick Harris/Executive Director  
National Association of Social Workers,  
Rhode Island Chapter  
Providence, RI

Marti Rosenberg/ Executive Director  
Ocean State Action  
Cranston, RI

James Celenza/Director  
Rhode Island Committee on  
Occupational Safety and Health  
Providence, RI

Emily Rochon/Action Vice President  
Rhode Island National Organization for  
Women  
Providence, RI

Kate Strouse/ Director  
Rhode Island PIRG  
Providence, RI

Topher Hamblett/Director of Advocacy  
Save the Bay  
Providence, RI

Liberty Goodwin/Director  
Toxics Information Project  
Providence, RI

Karen Feldman/ Coordinator  
Youth in Action  
Providence, RI

### **SOUTH CAROLINA (1)**

Greg White/ Vice President  
American Lung Association of South  
Carolina  
Columbia, SC

### **TENNESSEE (13)**

Erik Plakanis/ Chairperson  
321 Coalition  
Gatlinburg, TN

Erik Plakanis/ Owner  
A Walk in the Woods Guide Service  
Gatlinburg, TN

Brenda Black/ Dir. of Tobacco and Air  
Quality Programs  
American Lung Association of  
Tennessee  
Nashville, TN

Amy Beck/ Chair Person  
East Tennessee State University Campus  
Greens  
Johnson City, TN

Vesna Plakanis/ Co-Chair  
Gatlinburg Greenspace Committee  
Gatlinburg, TN

Ken Voorhis/ Executive Director  
Great Smoky Mountains Institute at  
Tremont  
Townsend, TN

Shannon Miller/ State Chair  
Green Party of Tennessee  
TN

Rachael Bliss/ Executive Director  
Kingsport Citizens for a Better  
Environment  
Kingsport, TN

Rachael Bliss/ Program Director  
Kingsport Citizens for a Cleaner  
Environment  
Kingsport, TN

Charles Lord  
Obed Watershed Association  
Pleasant Hill, TN

Westy Fletcher  
Peoples Action Coalition for the  
Environment  
Cosby, TN

Jeanette Berry/ Conservation Chair  
Tennessee Citizens for Wilderness  
Planning  
Greenback, TN

Will Callaway/ Executive Director  
Tennessee Environmental Council  
Nashville, TN

**TEXAS (5)**  
Don Dowdey/ Chair  
Big Bend Regional Sierra Club  
Alpine, TX

John D. Wilson/ Executive Director  
Galveston - Houston Association for  
Smog Prevention (GHASP)  
Houston, TX

Tom "Smitty" Smith/ Director  
Public Citizen's Texas Office  
Austin, TX

Karen Hadden/ Executive Director  
Sustainable Energy and Economic  
Development (SEED) Coalition  
Austin, TX

Luke Metzger/ Advocate  
Texas PIRG  
Austin, TX

**UNITED STATES VIRGIN ISLAND  
(1)**

Joe Kessler/ President  
Friends of Virgin Islands National Park  
St. John, USVI

**UTAH (3)**

Nanette Benowitz/ President  
League of Women Voters of Utah  
Salt Lake City, UT

Sam Rushforth/ Co-Chair  
Utah County Clean Air Society  
UT

Emily Hall/ Chair  
Wasatch Clean Air Coalition  
Salt Lake City, UT

**VERMONT (2)**

Ben Rose/ Executive Director  
Green Mountain Club  
Waterbury Center, VT

Paul Burns/ Exec. Dir.  
Vermont PIRG  
Montpelier, VT

**WASHINGTON (3)**

Sara Patton/Executive Director  
NW Energy Coalition  
Seattle, WA

Tim McNulty/ President  
Olympic Park Associates  
Sequim, WA

Robert Pregulman/ Exec Dir.  
Washington PIRG  
Seattle, WA

**WASHINGTON, DC (3)**

Andrew Fellows/ Chesapeake Program  
Director  
Clean Water Action (Chesapeake  
Region)  
Washington, DC

Lynn Thorp  
Clean Water Action (National)  
Washington, DC

Joy Oakes/ Mid-Atlantic Regional  
Director  
National Parks Conservation Association  
Washington, DC

John Stanton/ Vice President  
National Environmental Trust  
Washington, DC

**WISCONSIN (2)**

Marc Looze/ Clean Air Campaign  
Director  
Clean Wisconsin  
Madison, WI

Jennifer Giegerich/ State Director  
Wisconsin PIRG  
Madison, WI

**WEST VIRGINIA (5)**

Vivian Stockman/ Organizer  
Ohio Valley Environmental Coalition  
Huntington, WV

Wendy Radcliff/ Staff Attorney  
Appalachian Center for the Economy  
and the Environment  
Charleston, WV

Dave Startzel/ Executive Director  
Appalachian Trail Conference  
Harpers Ferry, WV

Sherry Evasic/President  
Blue Heron Environmental Network Inc.  
Hedgesville, WV

Carol Warren/ Chair  
Justice & Peace Program Unit (West  
Virginia Council of Churches)  
Charleston, WV