



United States Department of the Interior



NATIONAL PARK SERVICE
INTERIOR REGIONS 6, 7 & 8
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Lakewood, CO 80228

November 25, 2020

Margaret Earnest
MC 206, State Implementation Plan Team
Air Quality Division, Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Dear Ms. Earnest:

The National Park Service (NPS) appreciates the opportunity to review and provide comments on the Texas 2021 Regional Haze State Implementation Plan (SIP) Revision, Project Number 2019-112-SIP-NR. Under the Clean Air Act (§§169A and B) and Federal Regional Haze Rule (40 CFR §51.308) states are required to develop SIPs and engage substantively with agencies that manage national parks and wildernesses designated as Class I areas. States are also required to update SIPs every 10 years to address air pollution and ensure progress is made toward achieving the goal for “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.” In doing so, states are charged with identifying sources of haze causing emissions affecting Class I areas in and beyond the boundaries of their state, analyzing these sources for potential emission reductions, and developing a long-term strategy to reduce haze causing emissions.

The NPS manages 48 of the 156 mandatory Class I areas across the country where visibility is an important attribute. Texas is home to two NPS-managed Class I areas: Big Bend and Guadalupe Mountains National Park. Similarly, the NPS manages Carlsbad Caverns National Park and Bandelier National Monument in the adjacent State of New Mexico which are also designated as Class I areas under the Clean Air Act. These special places are home to unique geology, rugged nature, and inspiring vistas that lift the human spirit.

General Comments

Because the clarity of the views associated with these four nationally designated areas is affected by haze from air pollution that emanates, in part, from sources in Texas, the NPS offers the following recommendations to strengthen the draft SIP for your consideration. We look forward to working with the State of Texas to address these recommendations (which reflect the views of

the NPS and not the Department of the Interior) to ensure the plan makes reasonable progress towards long-term restoration of natural visibility.

The NPS has welcomed the various briefings and discussions held with the State of Texas since March 2020. However, after reviewing the draft SIP, the NPS continues to have many of the same concerns. Therefore, we have provided specific comments below related to the identification of Class I areas under NPS jurisdiction in source selection; additional four factors analysis of compliance cost and useful life of sources; consideration of long-term Regional Haze Program goals; and source emissions from oil and gas development in the Permian Basin.

Source Selection and Analysis of Class I Areas

The NPS recommends that the State of Texas explicitly consider Carlsbad Caverns National Park and Bandelier National Monument in New Mexico as potentially impacted Class I areas when choosing which sources to evaluate for potential emission reductions in the SIP. NPS monitoring data, back trajectory analyses, and Round 1 modelling provided by the Environmental Protection Agency (EPA) show that increased emissions from sources in Texas directly affect visibility at these federally designated Class I areas. While Carlsbad Caverns National Park is correctly represented by monitoring data collected at Guadalupe Mountains National Park, this Class I area has its own geographic definition that should be used to evaluate potential impacts.

We appreciate that the state identified emission sources relevant to visibility at Guadalupe Mountains National Park. The NPS recommends that the state modify the source selection method in order to identify sources for analysis that are relevant to reducing haze in Big Bend National Park. Such an adjustment would allow for consideration of meaningful emission reductions in the SIP to decrease haze-causing pollutants impacting air quality in the park.

Four Factor Analysis

Under Federal Regional Haze Rule (40 CFR §51.308) states must consider the following four factors in their source specific analyses: the cost of compliance, time necessary for compliance, energy and non-air environmental impacts, and remaining useful life of the source. Of these, cost and useful life are the most relevant to the proposed Texas SIP.

The NPS recommends that the state revisit the cost analysis in the draft SIP using source-specific criteria that meet EPA's Air Pollution Control Cost Manual recommendations. For example, per the guidance outlined in the Manual, we recommend that the state use an interest rate of 3.25% and a useful life of 20-30 years in its analysis instead of a uniformly high interest rate (10%) and a short useful life (15 years). We believe this will result in a sound and defensible control cost analysis for potential emission control technology on a facility-by-facility basis.

The NPS is available to work with the state to identify additional emission controls at lower costs for consideration for inclusion in the final plan.

Consideration of Long-term Regional Haze Program Goals

The NPS recommends the state not rely on a "visibility sensitivity analysis" comparing modeled visibility in 2028 with and without a subset of potential emission reductions to justify its decision

not to require any new emission controls. While it is reasonable to consider the short-term visibility benefit of emission reductions, this should not be the sole basis of emission control decisions. Rather, it is essential to consider the big picture and long-term objective of the Regional Haze Program. Modelling analyses of potential benefits therefore should be compared to an unimpaired or clean visibility condition.

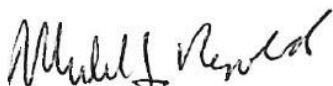
Emissions from Development in the Permian Basin

Finally, the NPS recommends that the state include nitrogen oxide emission limits on engines in the Permian Basin in the SIP, similar to those required in ozone nonattainment areas on the eastern side of the state. The Permian Basin has experienced rapid development in recent years that is contributing nitrogen oxide emissions. NPS monitoring data from IMPROVE samplers, back trajectory modeling, and other special studies identify that these increased development emissions directly affect visibility at Carlsbad Caverns National Park and other nearby Class I areas. Requiring nitrogen oxide emission limits would reduce winter-time haze and may also lead to lower ozone levels.

We appreciate having the opportunity to review and comment on this important draft SIP and look forward to continuing to work with Texas on achieving clean air and clear views for our national parks into the future. Through this pursuit of interagency collaboration and incremental improvement, the State of Texas can achieve the goal set forth in the Clean Air Act of restoring natural visibility in Class I areas.

If you have any questions, please contact Don Weeks (720-668-5089) with the NPS Regional Office (DOI Regions 6-8) or Melanie Peters (720-644-7632) with the NPS Air Resources Division.

Sincerely,



Michael T. Reynolds
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DOI Regions 6, 7, & 8

cc:

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