

COMMONALITIES AMONG FEDERAL LAND MANAGEMENT AGENCIES WITH REGARD TO PROTECTION OF AIR QUALITY RELATED VALUES

IDENTIFYING AIR QUALITY RELATED VALUES

There is strong agreement among FLMs on how to define AQRVs. All FLMs have agreed to use the proposed NSR definition of AQRV. That is:

A scenic, cultural, physical, biological, ecological, or recreational resource which may be affected by a change in air quality as defined by the FLMs ... for federal lands.

This definition is compatible with the general definition of AQRV that appears in the *Federal Register* (Vol. 43, No. 69, 15016). The *Federal Register* definition includes visibility, flora, fauna, odor, water, soils, geologic features, and cultural resources.

FLMs further refine AQRVs beyond the above definition to be more site-specific (i.e., Class I area-specific) by using on-site information. FLMs have developed inventories of sensitive resources for some Class I areas and recognize that inventories should be developed for all Class I areas.

Because all FLMs evaluate effects of air pollution on specific AQRVs or sensitive indicators of AQRVs, they believe that AQRVs should be identified for each Class I area. Further, they accept lead responsibility to identify the specific AQRVs of Class I areas they manage. Finally, FLMs agree on the need for continued inventory, research, and monitoring to improve their ability to determine which AQRVs are most sensitive to air pollution impacts and the sensitivity levels of specific AQRVs.

Determining the Levels of Pollution that Trigger Concern for the Well-Being of AQRVs

FLMs agree that it should be possible to establish consistent, specific levels of pollution that trigger concerns for AQRVs. Subject-specific FLAG subgroups will address these issues.

FLMs recognize both the need to assess cumulative impacts and the difficulties associated with assessing them. Difficulties arise when a large number of minor source impacts eventually lead to an unacceptable cumulative impact or when a new source applies for a PSD permit in an area that has a high background concentration of pollution from existing sources.

Visibility

FLMs use the same models to predict visibility impacts. They agree that threshold levels should be related to human perception. All use thresholds of visibility degradation measured in deciviews to evaluate source impacts to regional haze.

All FLMs use research literature and monitoring (especially IMPROVE monitoring data) to determine current conditions for visibility in Class I areas.

Ecological Effects

FLMs agree that they rely on available research, monitoring, models, and judgments of

biological effects experts in attempting to relate chemical changes resulting from emissions to biological changes in AQRVs. Further, they focus on sensitive receptors (defined as either species or processes) to assess this biological change.

FLMs recognize the need to address cumulative impacts to AQRVs. This means that a proposed new source should be evaluated within the context of the total impacts that are occurring or that potentially could occur on the AQRVs of the Class I area.

Determining the Level of Pollution Likely to Cause an "Adverse Impact" on AQRVs

FLMs rely on the best scientific information available. They re-evaluate, update, and assess this information as appropriate. They consider specific Agency and Class I area legislative mandates in their decisions and, in cases of doubt, "err on the side of protecting the air quality-related values for future generations." (Senate Report No. 95-127, 95th Congress, 1st Session, 1977)

FLMs generally suggest protocols for modeling analyses done by the permit applicants on a case-by-case basis. They all review modeling and impact analysis results as they pertain to specific AQRVs. All FLMs consider frequency, magnitude and duration of the impacts.