

BRIEFING STATEMENT
(May 3, 1999)
NATIONAL PARK SERVICE–AIR RESOURCES DIVISION
U.S. FISH AND WILDLIFE SERVICE–AIR QUALITY BRANCH
U.S. FOREST SERVICE–AIR QUALITY PROGRAM

TOPIC: Federal Land Managers' Air Quality Related Values Workgroup (FLAG)

BACKGROUND: The Clean Air Act Amendments of 1977 give Federal Land Managers (FLMs) an affirmative responsibility to protect the natural and cultural resources, or “air quality related values” (AQRVs), of designated national parks and wilderness areas from the adverse impacts of air pollution. For proposed new or expanding industrial facilities near these areas—known as Class I areas—FLM responsibilities include the review of permit applications. As part of this review, FLMs determine whether air pollution from these sources would have an adverse effect on AQRVs, including visibility. If an FLM determines that emissions from a proposed source will cause or contribute to adverse effects to AQRVs in a Class I area, the State permitting authority can deny the permit.

Individually, the FLMs have developed different approaches to identifying AQRVs and defining adverse impacts in Class I areas. For example, in 1986, the U.S. Forest Service (USFS) instituted a national screening process to identify the AQRVs for each of its Class I areas. Using this national process as a starting point, each USFS region refined the screening parameters and identified sensitive AQRVs within each Class I area. However, this resulted in some difference in the approaches and levels used by USFS regions. The National Park Service (NPS) and the Fish and Wildlife Service (FWS) have adopted a case-by-case approach to permit review, considering the most recent information available for each area. NPS and FWS have not completed lists of sensitive AQRVs nor defined adverse impact levels for all of their Class I areas. Consequently, State permitting authorities and industry have expressed frustration with the different approaches FLMs have taken to identify Class I area AQRVs and the specific levels of air pollution that may have an adverse effect on AQRVs. In response, the Environmental Protection Agency (EPA), in its 1996 proposed revisions to the New Source Review (NSR) regulations, encourages FLMs to identify Class I AQRVs and define the levels at which adverse impacts will occur. Also encouraged are the methods and procedures used to make an adverse impact determination. In addition, the new rules will encourage greater consistency among FLMs in the permit review process.

APPROACH: In April 1997, air resource managers representing USFS, NPS, and FWS initiated an interagency workgroup known as FLAG (**F**ederal **L**and Managers **A**Q**R**V Work **G**roup). The objective of FLAG is to “achieve greater consistency in the procedures each agency uses in identifying and evaluating AQRVs.” As part of this collaborative effort, FLAG members will work together to:

- define sensitive AQRVs,
- identify the critical loads (or levels) and the criteria that define adverse impacts, and
- standardize the methods and procedures for conducting AQRV analyses.

To accomplish its objective, FLAG will build on the procedures, terms, definitions, screening levels, etc. common to the agencies. Many such “commonalities” were identified early in the FLAG planning sessions. FLAG efforts will focus primarily on four areas: (1) terrestrial effects of ozone; (2) aquatic and terrestrial effects of wet and dry pollutant deposition; (3) visibility; and (4) process and policy issues. Independent subgroups comprising agency air resource managers and subject matter experts will be charged with developing a consistent set of recommendations for consideration by the entire workgroup. Subgroup findings and recommendations will undergo scientific peer review, as well as review by agency decision makers such as Class I area Park Superintendents, Refuge Managers, and Forest Supervisors; Regional Foresters; and the Assistant Secretary for Fish and Wildlife and Parks. (Note: USFS has delegated FLM responsibility for Class I areas under the Clean Air Act to the Regional Foresters. However, FLM responsibilities for NPS and FWS are held by the Assistant Secretary for Fish and Wildlife and Parks.)

FLAG’s Action Plan calls for a phased approach. Phase 1 will address issues that can be resolved quickly without the collection of new data. At the conclusion of Phase 1, the three agencies will publish a report that describes their procedures for identifying AQRVs; lists sensitive AQRVs; defines, when possible, the critical pollutant loads likely to cause an adverse impact; and describes methods for evaluating the potential impacts of pollution sources on Class I area AQRVs. The report will also provide guidance for PSD permit applicants. The procedures will include screening level values, when possible, to facilitate the permitting process (as requested by some States). FLAG plans include a *Federal Register* notice soliciting public comment on these methods and procedures. Phase 2 of the FLAG effort will address the more complex issues and unresolved issues from Phase 1 that may require additional data collection.

ORGANIZATION: In addition to the four subgroups, the FLAG organization includes Leadership and Coordinating committees and a Project Manager. The Leadership Committee, which includes the Air Quality Program Chiefs from the participating agencies, will be responsible for providing direction to the workgroup and the resources necessary for the FLAG effort. The Coordinating Committee, also comprising representatives from each agency, will be responsible for communications within the workgroup, including that among the agencies and subgroups. The FLAG Project Manager will be responsible for facilitating intra-workgroup communications, preparing and leading workgroup meetings, writing general workgroup reports, coordinating subgroup activities, serving as a single point of contact for subgroups, and other administrative and process-related activities.

CONTACTS:

Project Manager: John Bunyak, NPS Air Resources Division; P.O. Box 25287; Denver, CO 80225; Phone: (303) 969-2818; FAX: (303)969-2822; E:Mail: john_bunyak@nps.gov

National Park Service

Christine L. Shaver
Chief, Air Resources Division
P.O. Box 25287
Denver, CO 80225
(303) 969-2074

Fish and Wildlife Service

Sandra V. Silva
Chief, Air Quality Branch
P.O. Box 25287
Denver, CO 80225
(303) 969-2814

U.S. Forest Service

Donna Lamb
National Air Quality Program
Manager
Attn. USDA; P.O. Box 96090
Washington, D.C. 20090-6090
(202) 205-0800

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.