



United States Department of the Interior



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NATIONAL PARK SERVICE
Interior Regions 8, 9, 10, and 12
333 Bush Street, Suite 500
San Francisco, CA 94104-2828

IN REPLY REFER TO:
1.A.2 (PW-NR)

California Air Resources Board (to be submitted via [electronic public comment docket](#))
Attention: Ali Adams
Clerk's Office, California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Ms. Adams:

Thank you for the opportunity to review the proposed California Regional Haze State Implementation Plan (SIP) for the Second Implementation Period (2018-2028). The National Park Service (NPS) participated in early engagement and federal land manager consultation with the California Air Resources Board (CARB) regarding the SIP development from 2020 through April 2022. We appreciate the efforts that CARB invested in early engagement and consultation with the NPS. CARB provides for public transparency by summarizing NPS input in the public notice and responding to feedback in Appendix I of the proposed SIP. We take this opportunity to reiterate our primary recommendations for improving the SIP and advancing progress toward natural visibility conditions.

The NPS recommends:

- The SIP thoroughly evaluate both nitrogen oxide (NO_x) and sulfur dioxide (SO₂) emission reduction opportunities under the regional haze program. The proposed SIP focuses exclusively on NO_x but does not address SO₂ contributions to ammonium sulfate, a larger component of haze than ammonium nitrate in most of the state's Class I areas.
- The focus of the SIP be broadened to include analytical review of additional point source air pollution control measures. The NPS requests a robust justification for facility screening or full four-factor analyses for NO_x and/or SO₂ for: eight refineries, six cement plants, five biomass facilities, and one chemical facility identified in previous feedback.

California is home to nine NPS-managed Class I areas: Joshua Tree National Park, Kings Canyon National Park, Lassen Volcanic National Park, Lava Beds National Monument, Pinnacles National Park, Point Reyes National Seashore, Redwood National Park, Sequoia National Park, and Yosemite National Park. These iconic landscapes draw Californians and

INTERIOR REGION 8 • LOWER COLORADO BASIN*
INTERIOR REGION 9 • COLUMBIA—PACIFIC NORTHWEST*
INTERIOR REGION 10 • CALIFORNIA—GREAT BASIN
INTERIOR REGION 12 • PACIFIC ISLANDS

AMERICAN SAMOA, ARIZONA*, CALIFORNIA, GUAM, HAWAII, IDAHO, MONTANA*,
NEVADA, NORTHERN MARIANA ISLANDS, OREGON, WASHINGTON

*PARTIAL

visitors from around the world to connect with nature and history. They protect the world's tallest trees, rugged coastlines, dramatic geology, diverse habitat, and waterfalls that, on occasion, glow with the fire of the setting sun. Pollution-caused haze dulls the colors and textures of these amazing landscapes, obscuring distant features and diminishing visitors' experiences. In 2020, over 28 million people experienced the wonder of California's national parks, generating approximately \$2.7 billion in revenues for local economies. We are committed to this once-in-a-decade chance to contribute expertise and make a difference for clear views in our parks.

The NPS appreciates that California is engaged in mobile and point source NO_x reduction programs that will address nonattainment with the National Ambient Air Quality Standard for ozone in the state. As the proposed regional haze SIP highlights, reducing NO_x emissions through these programs will have co-benefits including reduction of ammonium nitrate, a significant component of haze in California Class I areas.

The proposed SIP focuses exclusively on mobile source NO_x emissions and defers controls to other air pollution control programs. This approach by CARB excludes significant opportunities to specifically address haze in the proposed SIP, especially the NPS' opportunity to substantively contribute to haze planning through technical review of potential facility level controls.

We look forward to continuing to work directly with CARB and welcome opportunities for further dialogue as California progresses towards a revised and final SIP. Please contact Jalyn Cummings (jalyn_cummings@nps.gov) or Melanie Peters (melanie_peters@nps.gov) if you have questions or need additional information.

Sincerely,

Frank Lands
Regional Director
National Park Service, Interior Regions 8, 9, 10, and 12

cc:

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