

APPENDIX H

Florida Department of Environmental Protection Division of Air Resource Management

Regional Haze SIP – Federal Land Manager Consultation Documentation

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FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

Via Electronic Mail

April 2, 2021

Mr. Tim Allen
Fish & Wildlife Service
Tim.Allen@fws.gov

Subject: Federal Land Manager Consultation - Regional Haze Second Implementation Period

Dear Mr. Allen,

Under the U.S. Environmental Protection Agency's Regional Haze Rule, each state must submit a State Implementation Plan (SIP) that provides for reasonable progress towards achieving natural visibility conditions in Class I areas, including Class I areas in other states. Florida has within its borders three Class I areas subject to the reasonable progress requirements: Chassahowitzka Wilderness Area, St. Marks Wilderness Area, and Everglades National Park.

Pursuant to 40 CFR 51.308(i)(2), Florida must provide the Federal Land Managers (FLMs) with an opportunity for consultation on the Regional Haze SIP no less than 60 days prior to the start of the public comment period on the SIP.

With this letter, the Florida Department of Environmental Protection (Department) is providing the Fish & Wildlife Service with Florida's draft Regional Haze SIP for the second implementation period to begin the 60-day FLM consultation period. The Department requests that you provide any comments on the SIP by June 1, 2021 and encourages you to set up a meeting to discuss any potential comments with the Department prior to providing final comments. The Department will include a summary of all FLM comments received in the Pre-Hearing SIP submittal and will address all FLM comments in the final SIP submittal.

The Department can provide any supporting documentation upon request. If you have any questions, please call or email Hastings Read at 850-717-9017 (Hastings.Read@floridadep.gov) or Ashley Kung at 850-717-9041 (Ashley.Kung@floridadep.gov).

Sincerely,

A handwritten signature in blue ink that reads "Jeff Koerner".

Jeff Koerner, Director
Division of Air Resource Management



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Tallahassee, FL 32399-2400

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Secretary

Via Electronic Mail

April 2, 2021

Ms. Melanie Pitrolo
United States Forest Service
Melanie.Pitrolo@usda.gov

Subject: Federal Land Manager Consultation - Regional Haze Second Implementation Period

Dear Ms. Pitrolo,

Under the U.S. Environmental Protection Agency's Regional Haze Rule, each state must submit a State Implementation Plan (SIP) that provides for reasonable progress towards achieving natural visibility conditions in Class I areas, including Class I areas in other states. Florida has within its borders three Class I areas subject to the reasonable progress requirements: Chassahowitzka Wilderness Area, St. Marks Wilderness Area, and Everglades National Park.

Pursuant to 40 CFR 51.308(i)(2), Florida must provide the Federal Land Managers (FLMs) with an opportunity for consultation on the Regional Haze SIP no less than 60 days prior to the start of the public comment period on the SIP.

With this letter, the Florida Department of Environmental Protection (Department) is providing the Forest Service with Florida's draft Regional Haze SIP for the second implementation period to begin the 60-day FLM consultation period. The Department requests that you provide any comments on the SIP by June 1, 2021 and encourages you to set up a meeting to discuss any potential comments with the Department prior to providing final comments. The Department will include a summary of all FLM comments received in the Pre-Hearing SIP submittal and will address all FLM comments in the final SIP submittal.

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Via Electronic Mail

April 2, 2021

Ms. Melanie Peters
National Park Service
Melanie.Peters@nps.gov

Subject: Federal Land Manager Consultation - Regional Haze Second Implementation Period

Dear Ms. Peters,

Under the U.S. Environmental Protection Agency's Regional Haze Rule, each state must submit a State Implementation Plan (SIP) that provides for reasonable progress towards achieving natural visibility conditions in Class I areas, including Class I areas in other states. Florida has within its borders three Class I areas subject to the reasonable progress requirements: Chassahowitzka Wilderness Area, St. Marks Wilderness Area, and Everglades National Park.

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With this letter, the Florida Department of Environmental Protection (Department) is providing the National Park Service with Florida's draft Regional Haze SIP for the second implementation period to begin the 60-day FLM consultation period. The Department requests that you provide any comments on the SIP by June 1, 2021 and encourages you to set up a meeting to discuss any potential comments with the Department prior to providing final comments. The Department will include a summary of all FLM comments received in the Pre-Hearing SIP submittal and will address all FLM comments in the final SIP submittal.

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Sincerely,

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Jeff Koerner, Director
Division of Air Resource Management



Our National Parks



Florida Regional Haze Consultation – 5/17/2021
NPS, Air Resources Division
Florida Department of Environmental Protection

5/17/2021

NPS Formal Consultation Call with Florida DEP for Regional Haze SIP Development

Attendees:

- National Park Service
 - Denesia Cheek, Southeast Regional Office – Atlanta, GA
 - Kirsten King, Air Resources Division (ARD) – Denver, CO
 - Debbie Miller, ARD – Denver, CO
 - Melanie Peters, ARD – Denver, CO
 - Jim Renfro, Great Smoky Mountains NP
 - Don Shepherd, ARD – Denver, CO
 - Andrea Stacy, ARD – Denver, CO
- Florida DEP
 - Jeff Koerner
 - Ashley Kung
 - Hastings Read
- FWS
 - Jaron Ming
- USFS
 - Jeremy Ash

NPS photos from left to right: Acadia NP, Denali NP, Yellowstone NP, Everglades NP

Agenda

- Welcome & Introductions
- NPS Regional Haze Background
- NPS Areas in Florida
- Everglades Visibility Data
- NPS Concerns with VISTAS Approaches to RH & Feedback for Florida
 - Source Selection
 - Exclusion of NO_x/Nitrate
 - URP & Visibility Considerations
- Next-Steps

We welcome discussion at any time during this presentation. Please feel free to ask question or add information along the way.

By the Numbers

- 423 national park units
- 328 million park visitors
- \$21.0 billion spent in local gateway regions



Nationally in **2019** (a 2020 report was not completed due to the pandemic)

328 million park visitors spent an estimated \$21 billion in local gateway regions while visiting National Park Service lands across the country.

These expenditures supported a total of

- 341 thousand jobs,
- \$14.1 billion in labor income,
- \$24.3 billion in value added, and
- \$41.7 billion in economic output in the national economy.

National parks are incredible places that highlight natural and cultural features while boosting local economies.

Graphics from: <https://www.nps.gov/subjects/socialscience/vse.htm>

By the Numbers

- **48** Class I areas
- In **24** states
- **90%** of visitors surveyed say that scenic views are **extremely** to **very** important
- **100%** of visitors surveyed rate clean air in the **top 5** attributes to protect in national parks



List of NPS managed Class I areas: <https://www.nps.gov/subjects/air/npsclass1.htm>

States with at least one NPS managed Class I area:

AK, AZ, CA, CO, FL, HI, ID, KY, ME, MI, MN, MT, NC, ND, NM, OR, SD, TN, TX, UT, VA, VI, WA, WY

Statistics citation:

Kulesza C and Others. 2013. National Park Service visitor values & perceptions of clean air, scenic views, & dark night skies; 1988–2011. Natural Resource Report. NPS/NRSS/ARD/NRR—2013/622. National Park Service. Fort Collins, Colorado

NPS photo of Great Smoky Mountains NP, NC & TN



The NPS has an affirmative legal responsibility to protect clean air in national parks.

- 1916 NPS Organic Act: created the agency with the mandate to conserve the scenery, natural and cultural resources, and other values of parks in a way that will leave them unimpaired for the enjoyment of future generations. This statutory responsibility to leave National Park Service units “unimpaired,” requires us to protect all National Park Service units from the harmful effects of air pollution.
- In the 1970 Clean Air Act: authorized the development of comprehensive federal and state regulations to limit emissions from both stationary (industrial) sources and mobile sources. The Act also requires the Environmental Protection Agency to set air quality standards.
- 1977 Clean Air Act Amendments: these amendments to the Clean Air Act provide a framework for federal land managers such as the National Park Service to have a special role in decisions related to new sources of air pollution, and other pollution control programs to protect visibility, or how well you can see distant views. The Act established a national goal to prevent future and remedy existing visibility impairment in national parks larger than 6,000 acres and national wilderness areas larger than 5,000 acres that were in existence when the amendments were enacted. (Class I areas)
- 1990 Clean Air Act Amendments: created regulatory programs to address acid rain and expanded the visibility protection and toxic air pollution programs. The acid rain regulations began a series of regional emissions reductions from electric generating facilities and industrial sources that have substantially reduced air pollutant emissions.

NPS photo of Washington DC: <https://npqgallery.nps.gov/AirWebCams/wash>

Visibility goal:
Restore natural conditions by 2064

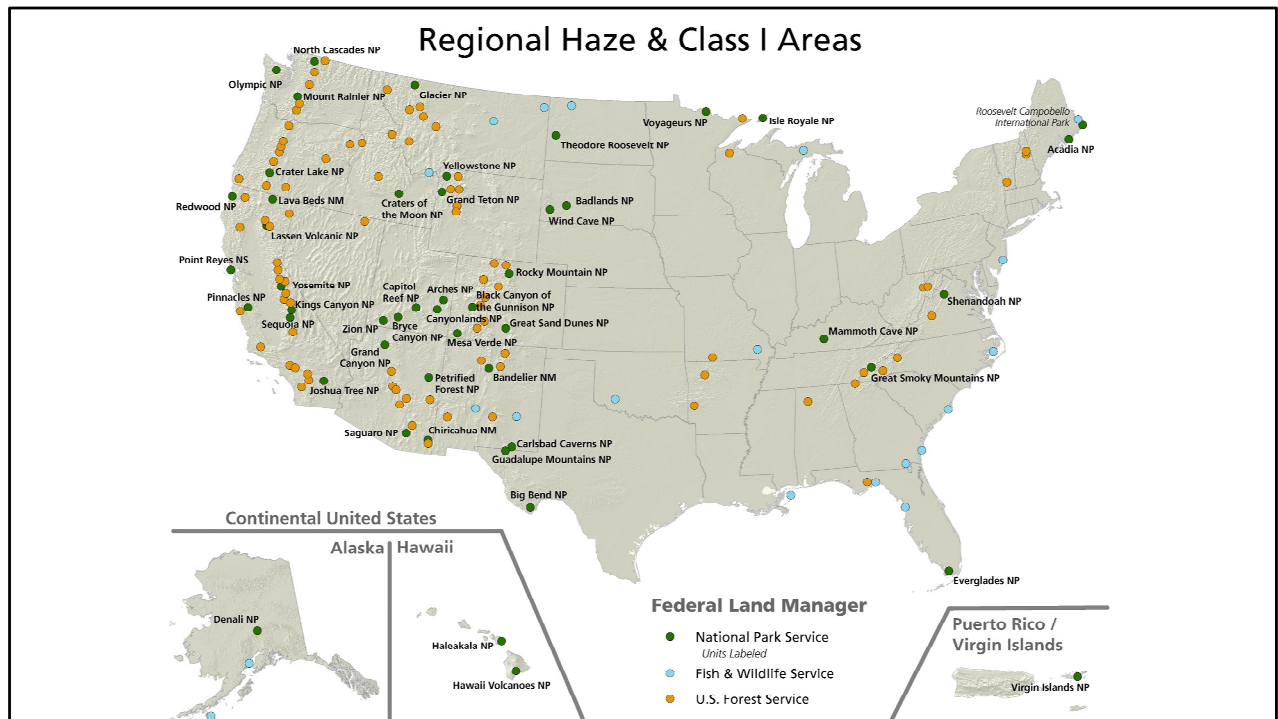


Yosemite NP, California

Left to right images illustrate hazy to clear conditions.

Haze obscures the color and detail in distant features.

NPS photos of Half Dome in Yosemite NP, CA



As you know, the NPS is one of three Federal Land Managers (FLMs) with responsibility for the 156 mandatory Class I areas nationwide where visibility is an important value (40 CFR 81). The NPS manages 48 Class I areas including Everglades National Park in Florida.

NPS map of Class I areas, 2020



Florida by the numbers

- 11** National Parks
- 12,009,271** Visitors to National Parks
- \$1,003,200,000** Economic Benefit from National Park Tourism
- 1** National Heritage Area
- 2** Wild & Scenic Rivers Managed by NPS
- 1,817** National Register of Historic Places Listings
- 46** National Historic Landmarks
- 18** National Natural Landmarks
- 1** World Heritage Site
- nps.gov/state/fl

Units managed by the National Park Service in Florida:

1. [Big Cypress](#) National Preserve, Ochopee, FL
2. [Biscayne](#) National Park, Miami, Key Biscayne & Homestead, FL
3. [Canaveral](#) National Seashore, Titusville and New Smyrna Beach, FL
4. [Castillo de San Marcos](#) National Monument, St. Augustine, FL
5. [De Soto](#) National Memorial, Bradenton, FL
6. [Dry Tortugas](#) National Park, Key West, FL
7. [Everglades](#) National Park, Miami, Naples, and Homestead, FL
8. [Fort Caroline](#) National Memorial, the Timucuan Preserve; Jacksonville, FL
9. [Fort Matanzas](#) National Monument, St. Augustine, FL
10. [Gulf Islands](#) National Seashore, Gulf Breeze, Florida and Ocean Springs, Mississippi
11. [Timucuan](#) Ecological and Historic Preserve, Jacksonville, FL

Statistics are from the 2019 [Visitor Spending Effects - Economic Contributions of National Park Visitor Spending - Social Science \(U.S. National Park Service\) \(nps.gov\)](#)

NPS photo of Everglades NP, FL

Everglades National Park



From the Everglades NP website—

America's Everglades - The largest subtropical wilderness in the United States
Everglades National Park protects an unparalleled landscape that provides important habitat for numerous rare and endangered species like the manatee, American crocodile, and the elusive Florida panther.

NPS photo of Everglades NP, FL

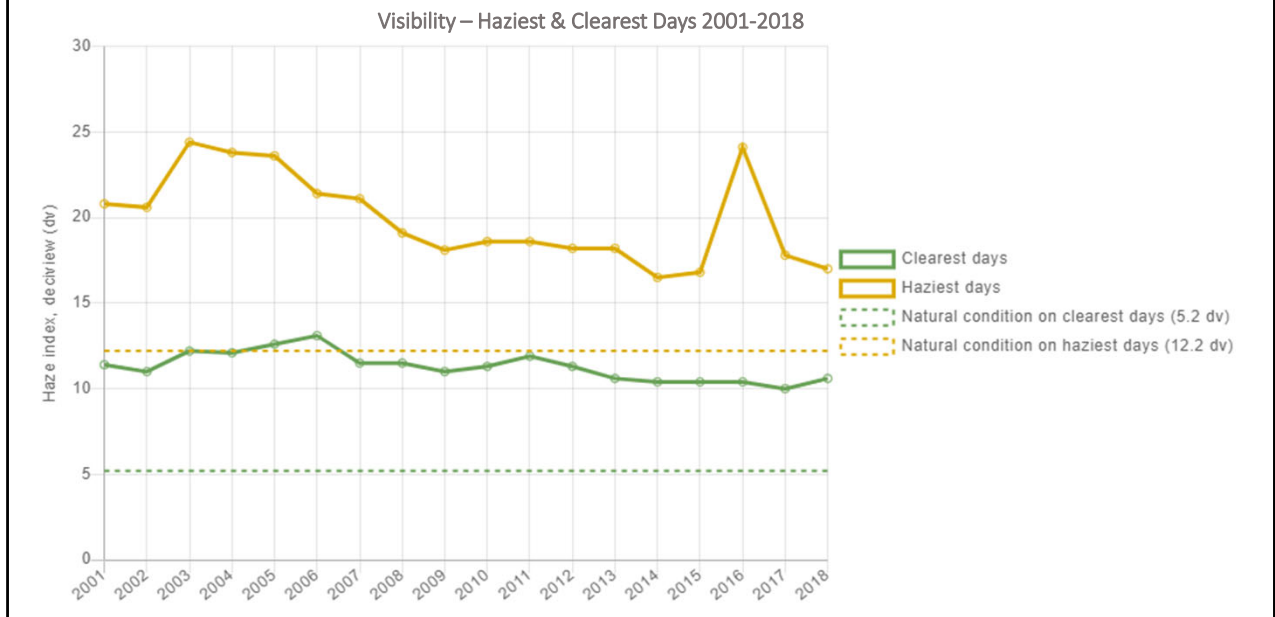
Everglades National Park



Everglades NP is an international treasure as well - a World Heritage Site, International Biosphere Reserve, a Wetland of International Importance, and a specially protected area under the Cartagena Treaty.

NPS photo of Everglades NP, FL

Everglades National Park



There is a long history of visibility monitoring at Everglades National Park (20 years!)

This chart shows annual average visibility on haziest and clearest days, as compared to natural conditions, going back to 2001. The regional haze metric is now based on most-impaired days rather than haziest but, it is still interesting to see the range of visibility conditions experienced by park visitors and monitored in the park.

Monitoring data show moderate but steady improvement on both haziest and clearest days. 2016 and 2017 were influenced significantly by fire events on the haziest days.

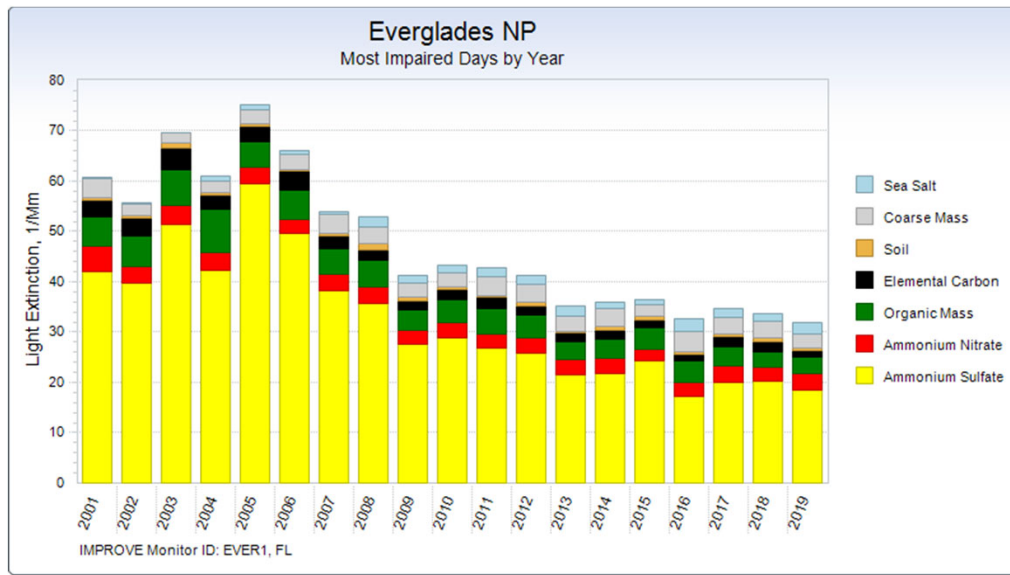
Progress has been made since first Regional Haze planning phase, and we want to continue to make progress over this second planning phase as well.

Long term visibility trend graph from:

[https://www.nps.gov/subjects/air/park-conditions-trends.htm?tabName=trends&parkCode=EVER¶mCode=Visibility&startYr=2001&endYr=2018&monitoringSite=EVER1%20\(IMPROVE\)&timePeriod=Custom](https://www.nps.gov/subjects/air/park-conditions-trends.htm?tabName=trends&parkCode=EVER¶mCode=Visibility&startYr=2001&endYr=2018&monitoringSite=EVER1%20(IMPROVE)&timePeriod=Custom)

Everglades National Park

Haze Composition - Most Impaired Days 2001-2019

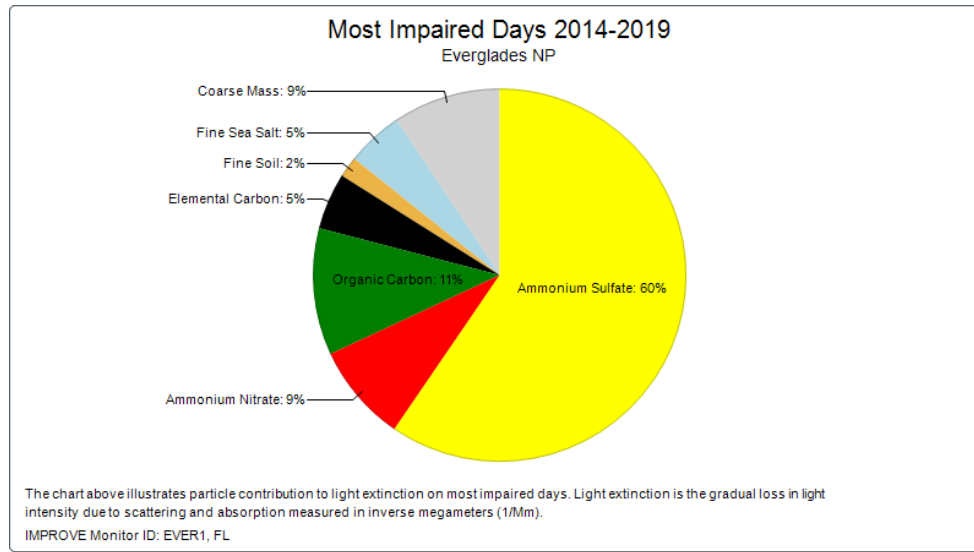


Over the past 20 years visibility monitoring data from the park show us that visibility has also improved on the most impaired days. Notably, the amount of light extinction (haze) from ammonium sulfate is now half what it was on most impaired days in the early and mid 2000's.

Most impaired days haze composition graph from:
<http://vista.cira.colostate.edu/Improve/aqrv-summaries/>

Everglades National Park

Haze Composition - Most Impaired Days 2014-2019



Over the last 5 years, on average ammonium sulfate is responsible for 60% of the light extinction monitored at Everglades NP on most impaired day. On this same set of days organic carbon makes up 11 % while ammonium nitrate and coarse mass are each responsible for 9% of light extinction.

Most impaired days haze composition pie chart from: <http://vista.cira.colostate.edu/Improve/aqrv-summaries/>

Source Selection

- The *individual facility percent-of-total-impact* metrics are arbitrarily high and inherently less protective of the more-impacted Class I areas in the VISTAS region.
- The threshold for selecting an individual facility is **80-times** higher in the most-impacted Class I area than in the least-impacted Class I area in the VISTAS region.


As we shared with VISTAS and member states on 5/21/2021, we have several overarching concerns with the VISTAS approach to regional haze SIP development—specifically source selection and the exclusion of NO_x. However, as we will discuss, these do not necessarily apply to Florida. We present them here for discussion and to answer any questions you may have about our perspective.

One of the primary concerns we have with the VISTAS approach in this round is the source selection methodology used by member states to identify sources for four factor analysis and associated potential emission reduction opportunities.

Our recent review of Florida's draft RH SIP highlighted for us that the *individual facility percent-of-total-impact* metrics employed by VISTAS are arbitrarily high and inherently less protective of the more-impacted Class I areas in the VISTAS region. Consequently, the absolute value threshold for selecting an individual facility is 80-times higher in the most-impacted VISTAS Class I area than in the least-impacted Class I area in the VISTAS region. A US Forest Service area, Dolly Sods Wilderness in West Virginia is the "most impacted" or visually impaired Class I area in the VISTAS region while the NPS managed Everglades National Park in Florida is the least impacted. This means that the absolute value of the percent-of-total impact threshold requires a source to have an impact that is 80-times greater to be selected for consideration at Dolly Sods vs. Everglades NP. This approach is biased against and offers the least protection for the most impacted areas.

Florida's Everglades NP, by virtue of its least impaired status, is receiving the highest level of protection under this *percent-of-total-impact* based metric.

Source Selection

- Underlying EWRT*Q/d analysis 
- Updated NPS lists of facilities
 - 80% of total
 - Absolute Value Threshold

To be clear, the main problem with the VISTAS source selection methodology is the application of an *individual-facility-percent-contribution* trigger for source selection.

We recognize and appreciate that the underlying the EWRT*Q/d metric employed by VISTAS is superior to a simple Q/d approach because it brings extinction and meteorology on the 20% MID into consideration. Accordingly, we have now updated our earlier recommendations for NPS Class I areas by using the VISTAS AOI results with EWRT*Q/d in two different ways:

1. The first applied a threshold that captures 80% of the total Class I Area impact (e.g., 80% of the TCI), as was recommended in the 2016 draft regional haze guidance. This produced a list of all the facilities that contribute up to 80% of the total cumulative impact in a given NPS VISTAS Class I area. We are calling these results the “80% cut-off results.”
2. The second alternative applied an absolute value threshold of $[(EWRT(SO_4)*Q/d(SO_2))+(EWRT(NO_3)*Q/d(NO_x))]$ = 0.0067 for an individual facility impact. This was the lowest absolute value of EWRT*Q/d for sources Florida selected for four factor analysis at Everglades NP—a Mosaic fertilizer plant. We are calling these results the “absolute value threshold results.” Because Everglades NP is the least-impacted Class I Area in the VISTAS region (based on total cumulative impact), this likely represents the lowest absolute value threshold used to select a facility for four factor analysis within the VISTAS region.

Florida DEP noted that the 80% of total impact guidance was in EPA’s 2016 draft guidance and not part of the final 2019 Regional Haze Guidance. This is true, but we had to pick a number to illustrate what may be a more reasonable approach, so we started there. A similar approach identifying sources that contribute to the top 90% or 70% or some other portion of the total cumulative impact may also be perfectly reasonable. For example, Arkansas used 70% of total impacts in a similar analysis to identify sources for four-factor analysis. The point is that this approach moves away from the need to attribute a specific percent contribution to any one source by identifying a group of sources that are cumulatively having a significant effect on visibility. In this way, states can reasonably identify sources contributing to visibility impairment at Class I areas without biasing the results in a way that is less protective of more impacted areas.

Exclusion of NO_x/Nitrate

- The VISTAS analyses justifying exclusion of NO_x do not adequately account for current conditions on the 20% most-impaired days.
- As SO₂ emissions decline and the seasonality of most-impaired days shifts, nitrate is increasingly important in many VISTAS Class I areas.
- States should evaluate control opportunities in this planning period.

Ammonium nitrate is a significant anthropogenic haze causing pollutant. Over the past 10 years the importance of ammonium nitrate on the 20% most impaired days has increased in most NPS managed VISTAS Class I areas. This is due in part to the dramatic reductions in ammonium sulfate and the shifting seasonality of most impaired days to more spring and winter days when ammonium nitrate can dominate.

VISTAS rationale for excluding NO_x emissions from reasonable progress is based on an outdated modeling base year (2011) and inaccurate assumptions about the current and future distribution of most impaired days. We recognize that the modeling meets EPA standards and are not suggesting that it needs to be re-done. Instead, we recommend that VISTAS states recognize the current monitoring data and the demonstrated importance of ammonium nitrate on most impaired days and use this information to supplement their current source selection analyses and the determination of which pollutants to consider in four-factor analyses.

By recognizing the importance and value of recent visibility monitoring data VISTAS states have an opportunity to adjust course and consider meaningful NO_x emission reduction opportunities in this round of RH SIP development. Reducing NO_x emissions would have additional regional co-benefits for ozone and acid deposition.

Visibility Benefit & URP Considerations

- Emission control decisions should be based upon the four factors identified in the Clean Air Act and not introduce an unintended fifth visibility factor.
- 2028 projections below the URP glidepath do not represent a “safe harbor” for avoiding otherwise reasonable emission controls.

The visibility benefit of individual emission controls, by design, is not part of reasonable progress as established by the CAA:

Reasonable progress goals are established through the application of the four factors (40 CFR § 51.308 d 1):

1. costs of compliance,
2. the time necessary for compliance,
3. the energy and non-air quality environmental impacts of compliance, and
4. the remaining useful life

In § II.B.5.a (pg 38) of the 2019 RH guidance, EPA states that “...because regional haze results from a multitude of sources over a broad geographic area, a measure may be necessary for reasonable progress even if that measure in isolation does not result in perceptible visibility improvement.”

Being ahead of URP goals does not justify the decision to delay or forego controls that are otherwise reasonable.

Source Selection

- Best of the VISTAS states because Everglades NP is the cleanest.
- New NPS list of sources for Florida:

C.D. MCINTOSH, JR. POWER PLANT
MIAMI-DADE WATER AND SEWER DEPARTMENT
MOSAIC FERTILIZER LLC (New Wales)
MOSAIC FERTILIZER, LLC (Bartow)
TAMPA ELECTRIC COMPANY (TEC)

- All but one of these was selected (and screened) by Florida.
 - Question: Why was Miami-Dade Water and Sewer not tagged for PSAT modeling? This facility is 38km from Everglades NP.

Our analysis finds that, because Everglades NP is the least impacted NPS Class I area in VISTAS, Florida selected a reasonable set of sources to evaluate for reasonable progress as part of regional haze SIP development. By re-running the VISTAS AOI analysis and applying the absolute value threshold we identify the five sources listed above as relevant to Everglades NP.

We understand that the EGUs are meeting MATS standard SO₂ emissions rate limit of 0.2 lb/MMBtu and that the fertilizer plants have recently installed modern SO₂ controls in order to meet the NAAQS. This is allowable justification for screening from full four-factor analysis and we do not have any further comment on these sources for this planning period.

We are curious: Why was Miami-Dade Water and Sewer (38km from Everglades NP) not tagged for PSAT modeling? What can you tell us about emissions from that facility?

Florida shared that Miami-Dade Water and Sewer did not trigger the individual Aol contribution of ≥ 5% for nitrates or sulfates established as a threshold for PSAT modeling.

NPS recommends adding a reminder of this rationale to the footnote of Table 7-23 which identifies Miami-Dade Water and Sewer as among 12 facilities not tagged for PSAT modeling without further explanation.

Florida also shared that the AOI analysis likely overpredicted the importance of this facility given it's close proximity to the park (an observed issue with the AOI sources that were tagged). Further, they highlighted that in 2011 Miami-Dade Water and Sewer was using high sulfur content fuel and that current and future emissions are expected to be lower as that fuel is no longer available/used.

Again, our analysis **only considered NPS Class I areas.**

Exclusion of NO_x/Nitrate

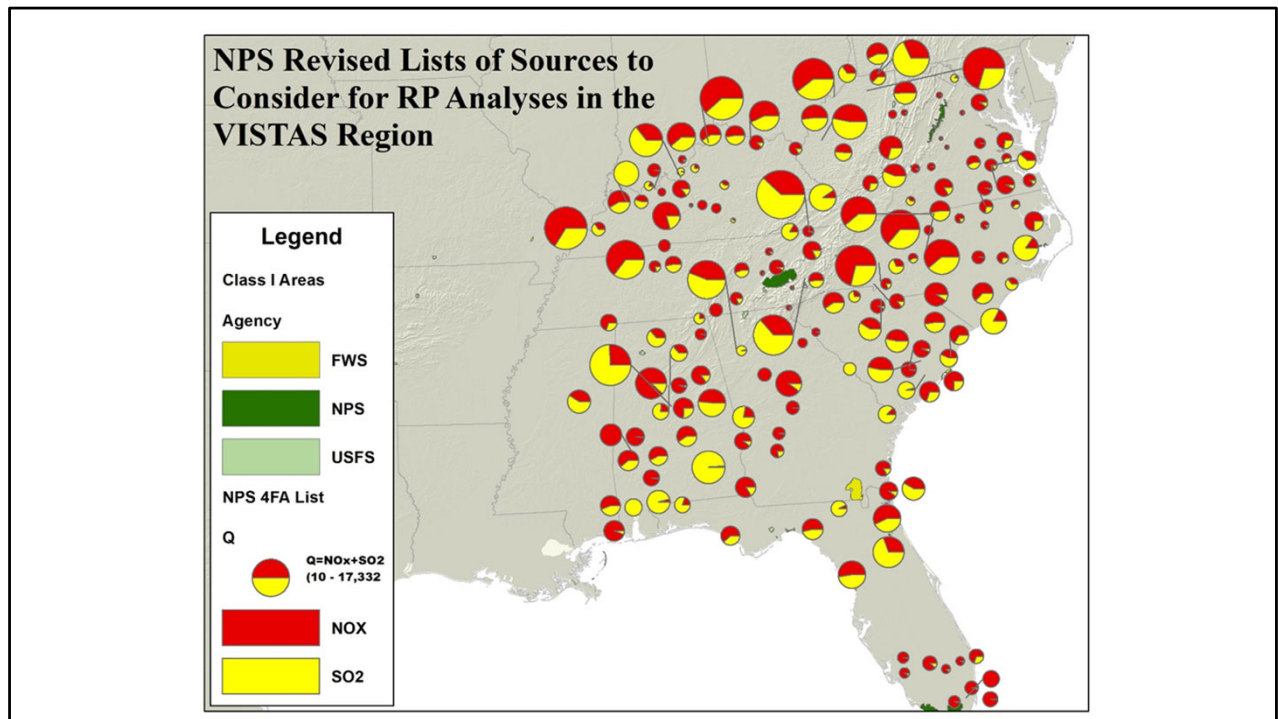
- In the specific case of Everglades NP, we agree that NO_x/Nitrate does not need to be a focus area for this planning period.
- Most of the SO₂ sources in southern Florida appear well controlled. Consider looking into NO_x control opportunities in the next round.

Visibility Benefit & URP Considerations

- We appreciate that Florida is not leaning on these considerations when making control determinations.

From 2014-2019 monitoring data from Everglades NP show that ammonium sulfate accounts for 60% of visibility impairing pollution on most impaired days and ammonium nitrate accounts for 9%. For this reason, we agree that it makes sense for Florida to focus on SO₂ emission reduction to address reasonable progress for Everglades NP.

Florida did not rely on visibility benefit or URP considerations when making control determinations.



This map shows the most recent emissions inventory data (2020-CAMD/2017-NEI) for VISTAS sources identified by the earlier (2020) NPS Q/d methodology. Although we are now recommending VISTAS states consider alternate approaches to source selection, this map illustrates the current distribution and scale of NO_x and SO₂ stationary sources in the region.

For southern Florida, we observe that the point source emissions are relatively low and almost entirely NO_x. We recommend that Florida DEP consider opportunities to tackle these emission sources in the next planning period.

Given the lack of large SO₂ point sources in the area, where is all of the visibility impairing SO₂ coming from?

Florida DEP shared that emissions from marine vessels outside the North American Emission Control Area (ECA) are a likely source of SO₂ affecting visibility in Everglades NP. The ECA is quite narrow in the straights of Florida allowing higher sulfur emissions from international vessels closer to shore than is permissible for most of the US. Regulation of marine emissions is outside Florida jurisdiction.

NPS appreciates Florida DEPs commitment to exploring this issue and continuing to improve air quality and visibility in the region.

NPS produced map, April 2021

Additional Feedback

- Cost estimates for the pulp and paper four-factor analyses presented in the draft Florida SIP may be inflated by an unjustified interest rate. Even so, the costs to control emissions at those sources appear reasonable.
 - Many states are considering \$5,000 to \$7,000/ton reasonable in this round
 - Washington State has established a \$6,300/ton threshold for pulp and paper sources
 - Oregon is applying a \$10,000/ton threshold to pulp and paper sources.

While Florida pulp and paper emission sources are not likely to affect Everglades NP, we encourage Florida to conduct rigorous four factor analysis and to require all technically feasible and cost-effective controls in the interest of reducing haze in the region. By correcting the interest rate Florida may find the costs of these controls even more reasonable than presented in the draft SIP.

National Park Service RHR - Round 2



- Thank you for meeting with us!
- Please share:
 - Anticipated SIP schedule
 - How you will respond to NPS comments
- Please let us know:
 - When public comment period opens
 - If/when a public hearing will be held
- The NPS will:
 - Email call summary & any add'l information
 - By **June 1, 2021**
 - Share our comments with EPA Region 4

The NPS will submit an email summary of the May 17, 2021 consultation call along with final review comments by June 1, 2021

The NPS requested the state to notify all parties when the draft SIP will be open for public review and comment, and to alert the parties to any public hearing dates.

The Florida DEP agreed and confirmed NPS comments will be addressed in the public draft.

NPS Contacts

NPS Southeast Region

- Denesia Cheek; denesia_cheek@nps.gov

Air Resources Division

- Melanie Peters; melanie_peters@nps.gov
- Don Shepherd; don_shepherd@nps.gov
- Andrea Stacy; andrea_stacy@nps.gov

Please reach out to us with any questions and include the above list of NPS staff on any formal notifications of public documents.

NPS photo of Everglades NP, Mangroves

From: [Peters, Melanie](#)
To: [Koerner, Jeff](#); [Read, Hastings](#); [Kung, Ashley](#)
Cc: [King, Kirsten L](#); [Shepherd, Don](#); [Stacy, Andrea](#); [Miller, Debra C](#); [Cheek, Denesia](#); [Renfro, Jim](#); [Ming, Jaron E](#); jeremy.ash@usda.gov; [Allen, Tim](#); [Pitrolo, Melanie -FS](#); [Notarianni, Michele](#); [Brian Timin](#)
Subject: NPS Florida Regional Haze Consultation Documentation
Date: Tuesday, June 1, 2021 7:12:10 PM
Attachments: [FL-NPS_RH_06-01-2021.pdf](#)

Hello Jeff,

The National Park Service (NPS) appreciates the opportunity to review the April 2021 pre-draft of the Florida Proposed Revision to State Implementation Plan (SIP), Submittal Number 2021-01, Regional Haze Plan for Second Implementation Period (2018-2028). On May 18, 2021, NPS Air Resources Division (ARD) and NPS Interior Region 2 hosted a regional haze SIP review consultation meeting with Florida Department of Environmental Protection staff. Representatives from the U.S. Forest Service, U.S. Fish and Wildlife Service also attended. An annotated set of slides shared during this meeting are attached. This email and attachment serve as documentation of NPS conclusions and recommendations resulting from formal regional haze consultation as required by 42 U.S.C. §7491(d).

As you know, Florida is home to three Class I areas: Chassahowitzka Wilderness Area, St. Marks Wilderness Area, and Everglades National Park (NP). Of these, only Everglades NP is managed by the NPS and is the focus of our review.

We commend Florida for putting together a well laid out and detailed SIP, and for engaging with NPS in the SIP development process. Although we have several concerns regarding the VISTAS approach to this round of SIP development, we are satisfied with how Florida has addressed reasonable progress for Everglades NP. We do not expect Florida to respond to the general VISTAS concerns discussed during our consultation call and shared with all VISTAS states on May 17, 2021. Everglades NP is the least visually impaired Class I area in the VISTAS region and has seen moderate but steady visibility improvement for the past 20 years. We appreciate that Florida identified four facilities as potentially affecting visibility in the park and understand that each of these facilities screens out of full four factor analysis because they are effectively controlled for sulfur dioxide emissions.

Additional progress will be needed to reach the ultimate regional haze goal of no human-caused visibility impairment at the park. To that end, we look forward to continuing our work with Florida for clean air and clear views into the future. If you have any questions, do not hesitate to reach out to us. Also, feel free to let us know if you have any edits to this summary and especially if any corrections are needed.

Best,
Melanie

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