

Ulla Reeves comments to OMB re: EPA's Transparency in Science rule.

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- Good afternoon, my name is Ulla Reeves, I am the senior advocacy manager in National Parks Conservation Association's clean air program. For over 100 years, since 1919, NPCA has been the leading voice of the American people in protecting and enhancing our National Park System. We have nearly 1.4 million members and supporters across the country. We advocate for and work to protect and preserve our nation's most iconic and inspirational places for present and future generations.
- NPCA has opposed EPA's "Transparency in Science" rule since it was first proposed because we feel it is a deeply flawed policy that could undermine sound science in policy making and public health protections that will in turn damage national parks, their visitors, park rangers, neighboring communities and beyond. This rule unnecessarily injects partisanship and political control by granting the EPA Administrator – a political appointee – the sole ownership of exemptions to this policy. At its very core, science should never be politicized.
- Sound science typically is objective and has no political agenda, therefore its findings are based on the most accurate and available information to date. Science is critical to policy decision-making and provides a process that explores how to best answer questions through a carefully structured approach. Science has an extremely rigorous set of filters, relies on carefully collected data and repeatable testing, and is subject to a thorough system of review. Science doesn't care what we believe, because it is based on objective information – not opinions. It cannot replace good decision-making, but science does enable us to make well-informed decisions and to

predict the consequences and outcomes of our choices. Without the benefit of comprehensive scientific knowledge, we cannot know how best to protect our national parks.

- There are so many examples of where sound science has led to critical protections for ecosystems benefiting rivers, streams, lakes, wetlands, oceans and estuaries as well as wildlife and key threatened species. Our detailed technical comments talk more about the science that has been critical to certain successes benefiting the health of prized national park ecosystems. I'll focus more of my comments on clean air in and around our parks:
- Although it speaks of transparency, in reality, this rule creates a double standard by allowing specific industry data to be kept confidential while exposing sensitive data underlying health-based studies. This is problematic for national parks. For example, public lands designated as federally mandated Class I areas are highly protected under the Clean Air Act through the prevention of significant deterioration (PSD) air permitting process. PSD proceedings require new or modified sources of pollution within a Class I airshed to undergo rigorous review of potential resource impacts (like reduced visibility, impairment to aquatic life or damage to vegetation) and such sources are subject to mitigation measures to ensure that new or increased pollution will be kept in check such that these 156 national parks, wilderness areas and wildlife refuges across the country remain protected.
- Under this rule, information such as cost modeling submitted by industry through PSD air permit applications, would continue to be shielded from disclosing important information to the public, yet used by the state or federal agency to determine the level of emission control required. Such permitting decisions often rely on confidential business information.

Therefore, the public is barred from commenting on, let alone knowing, the information on which an effective emission control may be bypassed in favor of a lax permit that would result in negative Class I area impacts that could otherwise be avoided. A rule truly designed to increase transparency should require the data of source operators and owners to be released to the public.

- We are also concerned that critical studies like the 2013 report, “National Park Service Visitor Values & Perceptions of Clean Air, Scenic Views & Dark Night Skies” that showed us how much tourists value clean air could be the kinds of qualitative data that EPA would disallow and disregard in the future under their proposed tiered access approach. This study followed standard scientific norms for gathering information from groups of people visiting parks. If this kind of study were to be devalued or disregarded for the protection of clean air in national parks because individuals weren’t named, it would be a great loss of information that shows the clear co-benefits of the economic value that people place on clean air—for many different reasons—when visiting parks. In addition, requiring individuals to sign over their names in order to participate would greatly reduce the likelihood of participation and would therefore limit the quality of information a study such as this could convey. EPA’s proposed rule unnecessarily modifies which studies can be considered and unscientifically reduces the consideration of valuable and necessary studies that aid the agency in setting policy to protect public health and the environment.
- Furthermore, regarding economic considerations, there is no doubt that national parks are powerful economic drivers for our nation. And clean air and clear views in national parks is one of tourists’ biggest interests when visiting these areas. So, the value of keeping parks healthy using strong

science is undeniably economically significant. We believe that **weakening the role of science that helps to achieve clean air and healthy park ecosystems will be detrimental to the economy.**

- According to DOI, in 2019, visitor spending in communities near national parks resulted in a \$41.7 billion benefit to the nation's economy and supported 340,500 jobs. Visitor spending increased by \$800 million from 2018 to 2019 and the overall effect on the U.S economy grew by \$1.6 billion. In the last five years, visitor spending has increased by \$4.1 billion and the effect on the U.S. economy grew by \$9.7 billion.
- A 2018 report on U.S. national park visitation found that visitation drops by at least eight percent when air pollution is high.
- According to another study about air quality in the Great Smoky Mountains National Park, just a 5 percent increase in visibility range would result in an approximate increase of half a million annual visits to the park. People pay attention to clean, healthy air and stunning views.
- *So, in closing, I thank you all for your time and I'd like to ask: Has OMB considered the value of the impact of this rule on national park gateway communities from an economic perspective? And knowing that haze and dirty air harms tourism, if this rule limits the ability of the agency to deliver clean air to touristed outdoor areas, what is the economic harm?*