

Testimony against the State of Maine's Petition to Remove Areas of the State  
From the Ozone Transport Region  
Stephanie Clement, Conservation Director, Friends of Acadia  
Before the Maine Department of Environmental Protection  
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Mr. Crawford, and the Honorable Staff of the Maine Department of Environmental Protection, my name is Stephanie Clement and I am Conservation Director of Friends of Acadia, a non-profit organization in Bar Harbor, Maine. Our organization's mission is to preserve, protect, and promote stewardship of the outstanding natural beauty, ecological vitality, and distinctive cultural resources of Acadia National Park and the surrounding communities for the inspiration and enjoyment of current and future generations. We have over 5,000 members who share a common love for Acadia National Park as one of Maine's and the nation's greatest natural assets. The testimony I am presenting today is solely the position of Friends of Acadia and should not be construed to represent the National Park Service.

First, I would like to thank the Maine Department of Environmental Protection (DEP) for more than 35 years of partnership with the National Park Service on air quality monitoring at Acadia. The information collected at two monitoring sites in the park, and the air quality forecasts and alerts that the Department generates are extremely helpful to visitors and those of us who live and work around the park. Friends of Acadia shares the Department's air quality advisories with our summer employees working in the park, and we thank you for that information.

I am here today with concerns about Maine's petition to remove most of the state from the Ozone Transport Region (OTR). We know from back trajectory analyses of air masses at Acadia that the worst air pollution days are associated with air masses that originate to the south and west of the park. Because Maine and Acadia are at the "end of the tailpipe" it is critical that state agencies and the EPA work together to reduce point and non-point sources of air pollution that contribute to ground-level ozone here.

We recognize that the state is recommending that Acadia and ten municipalities in Southern Maine remain in the Ozone Transport Region, but removing the rest of the state could be the beginning of the unraveling of the regional partnership on which Acadia's air quality depends. It

sends the wrong signal to other states that Maine is not fully engaged in reducing our own contributions to ground-level ozone—that we are leaving it up to them to shoulder the responsibility of protecting Maine’s air quality. If other states were to start petitioning to leave the OTR, Maine could be harmed.

Acadia’s visitors value clean air. In a 2009 survey of 1,160 visitor groups (73% response rate), 98% of respondents replied that clean air was “extremely important” or “very important.”<sup>1</sup> This is ten percentage points higher than the average response for other national park units surveyed across the country.<sup>2</sup> The reasons for this higher response are not known, but it demonstrates that clean air is one of the most important resources of Acadia National Park that should be maintained to keep visitors returning year-after-year. In 2017, visitors spent over \$284 million in the communities surrounding the park, making possible an estimated 4,163 jobs and labor income of over \$107 million<sup>3</sup>. Clean air is fundamental to the tourism economy in the region.

The overall air quality trends continue to improve at Acadia. When I began my work at Friends of Acadia in 1997, the moderate and high ground-level ozone alerts were much more frequent at Acadia. In 1999, Cadillac Mountain, the highest peak in Acadia and a destination for 75% of Acadia’s visitors, exceeded ozone standards five times during the summer and recorded ozone in moderate levels on 20 days. Unfortunately, we still have moderate and high ozone alerts. In 2017, we experienced one day where ozone exceeded standards for all people at Cadillac and five days where ozone was in moderate levels that were unhealthy for sensitive groups. There is more work to be done to improve Acadia’s air quality, and we hope that the Maine DEP will be a good partner to other states through the OTR to ensure they continue to partner with us to decrease these problems.

Friends of Acadia, Acadia National Park, the state of Maine and partners, such as the towns surrounding Acadia, local hoteliers, and L.L.Bean, have worked together to enhance our region’s air quality through local action. Together, the partners have planned and implemented the Island

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<sup>1</sup> Manni, Littlejohn, and Hollenhorst. June 2010. *Acadia National Park Visitor Study*. U.S. Department of the Interior, National Park Service, Social Science Program, Park Studies Unit, Visitor Service Project Report 221, p. 73

<sup>2</sup> Kulesza, Le, Littlejohn, and Hollenhorst. February 2013. *National Park Service Visitor Values & Perceptions of Clean Air, Scenic Views & Dark Night Skies, 1988-2011*. U.S. Department of the Interior, National Park Service, Natural Resource Stewardship and Science; Natural Resource Report NPS/NRSS/ART/NRR—2013/632, p. 47.

<sup>3</sup> Thomas, Koonz, and Cornachione. April 2018. *2017 National Park Visitor Spending Effects, Economic Contributions to Local Communities, States, and the Nation*. U.S. Department of the Interior, National Park Service, Natural Resource Stewardship and Science. Natural Resource Report NPS/NRSS/EQD/NRR—2018/1616, p. 31.

Explorer bus system, a fare-free, propane-powered regional transit system that serves the park and surrounding communities. More than 581,000 people rode the bus system in 2017, and rough estimates are that the Island Explorer has kept over 2.7 million automobiles off of local roads, has reduced smog-causing pollutants by more than 38 tons, and has prevented more than 25 thousand tons of greenhouse gases since the bus system's inception in 1999. Acadia's visitors care about the future of our park, and we depend on the EPA, states, and industry to assist our local initiatives to improve Acadia's air quality.

Acadia National Park is a natural laboratory that demonstrates that the Clean Air Act is working, but continued success relies on strong partnerships. If Maine were to back most of the state out of the OTR, it could potentially weaken the partnership that is most significant for Acadia's air quality. We urge the DEP to be a good partner to the OTR states and abandon this petition. Thank you very much for considering our comments opposing the state's petition to remove most of Maine from the Ozone Transport Region. I'd be happy to entertain any questions and am available at [stephanie@friendsofacadia.org](mailto:stephanie@friendsofacadia.org) or 207-288-3340.