

**Blue Ridge Environmental Defense League
National Parks Conservation Association
Piedmont Environmental Council
Sierra Club
Southern Environmental Law Center**

January 29, 2003

The Hon. Gale Norton
Office of the Secretary
Department of the Interior
1849 C Street NW
Washington DC 20240

delivery by hand
(original mailed)

Dear Secretary Norton:

We understand that representatives of Competitive Power Ventures (CPV), which proposes to build a 520 MW gas-burning power plant in Warren County, Virginia, just north of Shenandoah National Park, are meeting with your senior staff on Friday to discuss this proposal. Meanwhile, neither the key people at the Virginia Department of Environmental Quality nor at the National Park Service's Air Resources Division have received a complete application from CPV, including analysis of the impacts of pollution from the CPV facility on air-quality-related values.

We urge you to resist pressure from CPV to support its proposal, which would create a significant new pollution source fewer than five miles from Shenandoah National Park's Front Royal gateway.

Shenandoah National Park already is overwhelmed by pollution, as demonstrated by these facts:

1. According to an analysis based on National Park Service monitoring data from 1991-2001, Shenandoah is America's second most-polluted national park.
2. Streams in the park and throughout western Virginia continue to become more acidic and less able to support native fish, even the acid-tolerant brook trout, despite national pollution reductions achieved by the 1990 Acid Rain program of the Clean Air Act.
3. Shenandoah is one of nine national parks across the country that fails to meet the EPA's human health-based limits for ground-level ozone pollution.
4. Annual average ozone exposure, meaning ozone at levels harmful to plants, is higher at Shenandoah than in metropolitan Washington, D.C. Forty plant species in the park are sensitive to ozone damage.
5. Annual average visibility at the park should be approximately 100 miles, but instead is 25 miles. Summer average visibility should be approximately 60 miles, but instead is 15 miles.

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However relatively clean the proposed CPV facility would be, there is no rational and compelling reason to site a significant new pollution source next to one of the most polluted national parks in the country.

Our concerns are heightened in the wake of the department's reversal earlier this month of its "finding of adverse impact" of pollution from the proposed Roundup power plant in Montana near Yellowstone National Park. The department's reversal of the National Park Service's finding that the Roundup power plant would harm air quality in Yellowstone National Park was inconsistent with the analysis by Park Service scientists.

Given these facts, we urgently request that you insist that the scientific review of the proposed CPV facility near Shenandoah National Park move forward unimpeded by pressure from industry special interests.

Sincerely,

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cc: The Hon. Fran Mainella
The Hon. John Warner
The Hon. Frank Wolf
The Hon. Robert Goodlatte
The Hon. Eric Cantor
Douglas Morris, Superintendent, Shenandoah National Park