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THE WHITE HOUSE

WASHINGTON

February 25, 1994

Ms. Mary K. Jakeway
Senior Environmental Engineer
Whirlpool Corporation
Marion Division
1300 Marion-Agosta Road
Marion, OH 43302

Dear Ms. Jakeway:

Thank you for your letter regarding the Enhanced Monitoring Rule of the Clean Air Act Amendments of 1990. It was good to hear from you.

As you know, I am dedicated to the preservation of the environment in a way that leads to strong and sustainable economic growth. I understand your concerns about the Enhanced Monitoring Rule. I have taken the liberty of forwarding a copy of your letter to the EPA for their reference. Please be assured that all viewpoints, including those of industry, will be considered as the rule is finalized.

Again, thank you for sharing your views with me.

Sincerely,

Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/jdm



Marion Division

1300 MARION-AGOSTA ROAD, MARION, OHIO 43302 • AREA CODE 614 383-7122

January 28, 1994

Katie McGinty
Deputy Assistant to the President and Director
Office of Environmental Policy
Old Executive Office Building
Room 360
Washington, D.C. 20500

Dear Ms. McGinty,

The Enhanced Monitoring Rule proposed pursuant to the Clean Air Act Amendments of 1990 will impact the Whirlpool Corporation since we are a "major manufacturing facility". The EM requirements are in addition to compliance assurance monitoring already required for the same operations under the new federal permitting requirements and produce no incremental environmental benefit beyond that required by permit monitoring.

As the environmental engineer for the Marion, Ohio Division of the Whirlpool Corporation, I would like to submit the following comments regarding the enhanced monitoring rule as proposed:

1. This represents another unfunded mandate that is contrary to Executive Order 12875 and contravenes the Regulatory Planning & Review Directive in Executive Order 12866, with additional hidden costs to states to revise their state implementation plan. These requirements also ignore the significant compliance costs state and local governments will incur for their own compliance with EPA enhanced requirements at water treatment facilities, state universities, hospitals, airports, local incinerators, and maintenance shops for municipal buses and other governmental fleets.
2. The rule would place extra cost burdens on the regulated community without justifiable environmental benefits.
3. Large Environmental Opportunity Costs -- The rule will freeze manufacturing technologies and pollution control as well as innovative pollution prevention because of financial and human resources diverted to meeting enhanced monitoring requirements.
4. EPA has grossly understated the cost of compliance equipment and of its operations and maintenance.

5. Rule locks in existing operations and create a disincentive for pollution prevention and waste minimization, which will reduce incentive to create new jobs and could close economically marginal operations which otherwise meet all environmental standards.

Ohio EPA estimates an additional staffing level of 20 persons to handle the additional workload generated by this rule alone. For sulfur dioxide, 129 sources emitting greater than 1000 tons/year represent 96% of the total emissions. These 129 sources represent 5.8% of the total sources impacted by the rule. Therefore tremendous effort and cost would be expended for minimal return. For VOC's, 70% of the emissions would be captured by those sources emitting greater than 1000 tons/year.

Requiring submittal of quarterly reports will add costs with no benefits. The operating permit program already requires submittal of monitoring data from all sources.

Whirlpool is part of the voluntary 33/50 program and has reduced emissions 60% from 1987 levels. The EM program will pull manpower from this pollution prevention effort to conduct "after the fact" monitoring. We urge you to incorporate industry concerns into the final rule.

Sincerely,

A handwritten signature in cursive script that reads "Mary K. Jakeway".

Mary K. Jakeway
Sr. Environmental Engineer

MKJ:kt

cc: Sally Katzen, Administrator
Office of Information & Regulatory Affairs

THE WHITE HOUSE

WASHINGTON

February 24, 1994

Mr. Johnson
Five
8161

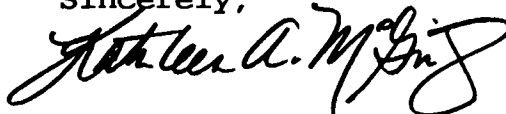
Son:

Thank you for contacting me regarding your thoughts about logging operations conducted in the Tennessee River Valley. It was good to hear from you.

Now, I share President Clinton's and Vice President Al Gore's commitment to the preservation of our environment. I understand your concerns about the potential environmental impacts of logging mills on the adjacent rivers, as well as the impacts of timber harvesting in regions surrounding the mills. I am sure that the Administrator of the Environmental Protection Agency, the Acting Assistant Secretary of Civil Works of your agency, will take your concerns into consideration.

Thank you for sharing your views with me.

Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

Feb. 14

Ms McGinty

I am writing this letter to you because I am concerned about the possibility of an invasion of chip mills, pulp mills, and paper mills into the bioregions of the Southeastern United States. Clearcutting of the native hardwood forests to make pulp, to ship off to Japan, to subsequently plant monospecies pine plantations, on any scale is completely unacceptable. I demand that justice be done for once in a situation like this, instead of the usual ~~money~~ 'money talks' - influenced outcome. Specifically - the Army Corps of Engineers should be strictly made to follow all Environmental rules and regulations in regard to this problem.

Sincerely,

Newkirk L Johnson
13800 Lake Drive
Monroe, MI
48161

THE WHITE HOUSE

WASHINGTON

February 17, 1994

Mr. Thomas Jensen
Executive Director
Grand Canyon Trust
"The Homestead"
Route 4
Box 718
Flagstaff, AZ 86001

Dear Mr. Jensen:

Thank you for writing to me about noise pollution in the Grand Canyon. As always, it was good to hear from you.

As you know, I am dedicated to the improvement of America's natural resources. I appreciate your bringing this problem to my attention. I understand your concern in this area, and have taken the liberty of forwarding your letter and information to the FAA for their review and response. I am sure that your concerns will be given every consideration.

Again thank you for sharing this information with me.

Sincerely,

A handwritten signature in black ink, reading "Kathleen A. McGinty". The signature is fluid and cursive, with the first name "Kathleen" being more prominent and the last name "McGinty" following in a similar style.

Ms. Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/jdm

G R A N D C A N Y O N T R U S T

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Thomas C. Jensen
Executive Director

MEMORANDUM

TO: Katie McGinty

FR: Tom Jensen TCJ

RE: Attached Articles

DT: November 23, 1993

Katie,

~~Isn't there something you could do to encourage the FAA~~
~~to protect the Grand Canyon?~~ They've got the jurisdiction,
they've got the authority, they just don't have the political will.
This should be an easy one.

~~The single best first step for the FAA to take would be to~~
~~sign on to the agreement that is referenced in the Arizona~~
~~Republic editorial.~~

Have a great holiday. It was a delight to see you the other evening. I hope all is well.

Please let me know if you would like additional information on the aircraft issue.

Tom



THE ENVIRONMENT

Push afoot to shush air-tour park noise

By Linda Kanamine
USA TODAY

National park visitors are umbling about obtrusive noise from air tours.

Six years after Congress passed a law to turn down the volume from tour planes and helicopters over Arizona's Grand Canyon, activists there / Cape Solitude has no solitude. Point Sublime isn't.

Similar complaints created such cacophony at Hawaii's craters, pools and volcanoes that Congress begins hearings today on legislation to curb flight effects over national parks there.

"It sounds like you're in downtown traffic," says Honolulu's Nelson Ho, about hiking the giant crater at Haleakala National Park.

"In the 1970s, the only sound there was the wind, the crunching of lava cinder beneath my boots, and the sound of blood rushing through my eardrums."

Hawaii and Grand Canyon are a leading wave in the soaring, \$180 million-a-year air tour business.

As the nation's most treasured real estate draws ever-growing crowds — 250 million a year — air tour operators aren't far behind.

Air operators call this legislation, and a pending Park Service report on systemwide problems, an attack.

"The park service says we have not restored the natural quiet to the Grand Canyon, as the law requires," says Miles Becker of Papillon Grand Canyon Helicopters. "But we must figure out some type of solution."

Meanwhile, the popularity of air tours is spreading:

► Helicopter flights began this summer over Arches and Canyonlands national parks in Utah. Moab, Utah, is debat-

ing a ban of the helicopter landing pad there.

► A helicopter operator tried to locate a helipad outside Utah's Zion National Park. Adjacent towns rejected it, saying Zion Canyon is a natural echo chamber.

► Tennessee, home to the Great Smoky Mountains National Park, passed a law prohibiting helipads within 9 miles of the park border. Businesses are challenging it.

Superintendents have no real authority to limit, control or charge fliers because air traffic is regulated by the Federal Aviation Administration. "That's why there's frustration," says the Park Service's Wesley Henry.

He is compiling a report that shows visitors continue to be unhappy about noise.

Recommendations to Congress may range from limiting numbers, times and areas of overflights; giving operators incentive to use new, quiet technology; and charging fliers park fees.

For Roger Clark of the watchdog group Grand Canyon Trust there's little doubt change is needed: "If you're seeking solitude, it's a place hard to get to."

But the key rests in large part with the FAA, concerned primarily with safety.

"The agency recognizes that protecting the environment is also part of our mission. We intend to cooperate fully with the Park Service," says the FAA's Pat Cariseo.

Without action soon, many parks will face the same pressures as the Grand Canyon, says Terri Martin of National Parks and Conservation Association. "National parks are just 1.5% of the land base in the lower 48 states, and you still can't escape the sound of machinery?" she says. "That's a travesty."

THE NATION'S NEWSPAPER

USA TODAY

NO. 1 IN THE USA... FIRST IN DAILY READERS.

Noise in national parks

The National Park Service studied aircraft noise at 39 of its 367 sites in the USA. Those sites found to have noise that could be considered annoying:

ARIZ.: Glen Canyon National Recreation Area, Grand Canyon National Park, Saguaro National Monument

ARK.: Buffalo National River, Hot Springs National Park

CALIF.: Sequoia and Kings Canyon national parks, Yosemite National Park

FLA.: Everglades National Park, Gulf Islands National Seashore (also in Mississippi)

GA.: Cumberland Island National Seashore

HAWAII: Hawaii Volcanoes National Park, Haleakala National Park

MD.: Assateague Island National Seashore

MASS.: Cape Cod National Seashore

MO.: Wilson's Creek National Battlefield

MONT.: Glacier National Park

NEV.: Lake Mead National Recreation Area

N.M.: Bandelier National Monument

OHIO: Perry's Victory, International Peace Memorial

PA.: Gettysburg National Military Park

S.D.: Mount Rushmore National Monument

TENN.: Great Smoky Mountains National Park

VA.: Shenandoah National Park

WASH.: Mount Rainier National Park, North Cascades National Park, Olympic National Park

Source: National Park Service

The New York Times

THE NEW YORK TIMES **EDITORIALS/LETTERS** WEDNESDAY, NOVEMBER 17, 1993

Parks Are for People, Not Planes

You and your kids have just hiked or driven to Desert View, a vantage point at the eastern end of the Grand Canyon. To the north and west lies the Colorado River; to the east, the Painted Desert. And right above you, not quite close enough to touch but certainly close enough to ruin the moment, hovers a sightseeing helicopter.

The Grand Canyon has become a battleground for the human senses, and the airplanes are winning. At peak season, anyone standing at Desert View might experience only a few minutes of tranquillity between flights.

This is not what Congress had in mind when it passed the National Parks Overflights Act in 1987 to restore "the natural quiet and experience of the park." Subsequent regulations banned flights below the canyon's rim but did nothing to prevent flights from doubling in the next six years. Nearly 800,000

visitors buzzed the canyon in 1992; one outfit alone conducts 100 flights a day during the summer.

The villains are not so much the tour operators as the Department of Transportation and the Federal Aviation Administration. In 1988 the F.A.A. gave Arizona \$1 million to expand helicopter facilities at Grand Canyon National Park Airport, which could lead to still more flights.

Bruce Babbitt, the Secretary of the Interior, has urged the Secretary of Transportation, Federico Peña, to delay the expansion pending the completion of a National Park Service study on noise levels. Mr. Babbitt clearly foresees a day when there will be fewer flights, not more; so far, Mr. Peña has been silent on the matter.

It's difficult to find any national park where only the silence of nature is heard. Parks are for people. But not for 200 or 300 planes a day.

EDITORIALS

OVERFLIGHTS AT GRAND CANYON

FAA lost in space

OK Mr. President, what is it going to take to bring a little badly needed focus to the Federal Aviation Administration? We're not alluding to the crowded air corridors above metropolitan areas of the East or West coasts. We're talking about the congested skies above one of the marvels of this planet — the Grand Canyon.

In the past the FAA curiously has moved with all the grace of a stubborn burro whenever Grand Canyon overflights has been the topic. Early on the FAA always had a great deal of difficulty coming to grips with the congressional intent of the 1987 legislation that sought to regulate noisy and intrusive overflights at Grand Canyon National Park for the "substantial restoration" of the natural quiet.

Six years later, with the number of rattling helicopters having doubled — serving 250,000 passengers per year — the stubborn streak shows no signs of weakening.

The FAA now is refusing to participate in an agreement that is being sought by, among others, the National Park Service and the non-profit Grand Canyon Trust, a Flagstaff-based environmental group. The idea is to limit the expansion of helicopter air tours pending the completion of studies on aircraft noise and air capacity over Grand Canyon.

Oddly, not even a letter from Interior Secretary Bruce Babbitt to Transportation Secretary Federico Peña seems to have lit a fire. The only thing it has produced is stoney silence. Do matters of turf take precedent on something as important as improving the canyon experience for visitors from around the world, Mr. President?

What Babbitt is seeking are assurances that a new heliport at Grand Canyon National Park Airport will not be used by air tour operators as justification to expand operations until ongoing studies are finished. The interior secretary warned that the construction of new helicopter facilities "has the potential to increase the capacity for overflights and thus will further negate the statutory goal." With the canyon skies arguably at capacity and with few places left where noise is not a

meddlesome bother, Babbitt clearly is on the mark.

What makes this dalliance by the FAA especially bothersome is the fact that there appeared to be a consensus reached this summer in Gov. Symington's office. The purported deal was that canyon tour operations for each company would be set at the level recorded from Sept. 1, 1992 through Aug. 31, 1993, plus a 5 percent growth. These limits would be in force until new regulations based upon the NPS study of noise.

This is a sensible approach and should not be onerous for tour operators. To permit uncontrolled expansion at this time would be foolish, especially if the studies find that the canyon's level of quietness is not appreciably improving.

Tour operators, for their part, appear to be willing to limit expansion, but with a catch; a loophole as big as the Big Ditch is deep. They would do so only for 12 months, not wanting to wait until implementation of new regulations. The difficulty with this cart-before-the-horse approach is that if full-blown expansion were to be allowed, the law likely would be on the side of tour operators, regardless of what the studies found. Thus, the possibility exists for more flights and more noise, and the studies be damned.

It was the FAA that awarded Arizona \$1 million for the building of new facilities at Grand Canyon. That was in 1988, and still pending is the awarding of leases by Arizona to air tour operators. The consolidation of operations at the airport cannot be faulted from the standpoint of safety.

But this is much more than just a question of safety. This is about natural quiet at Grand Canyon, about following the will of the U.S. Congress, and about not letting the skies over the crown jewel of the country's park system rival LAX.

Mr. President, you ought to haul the FAA back to Earth, and encourage the agency to keep air tour operations at Grand Canyon in line with existing levels. What's the rush? Until studies are completed and new regulations imposed, to permit anything else would be irresponsible and premature.