



PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY

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GREENLATINOS
Luchando por la Liberación Ambiental



BEYOND PLASTICS

BENNINGTON COLLEGE

August 9, 2022

Secretary Deb Haaland

Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Via registered mail and email: naomie_germain@ios.doi.gov

RE: REDUCING PLASTICS IN NATIONAL PARKS

Dear Interior Secretary Haaland,

We applaud the Department of Interior, June 8, 2022, Executive Order No. 3407 to eliminate the plastic waste Department and phase out plastic products by 2023. However, with respect to the National Park Service, the ten-year phase out is too slow and we are concerned that as has been done in the past, subsequent administrations could reverse this policy.

Many national parks are drowning in discarded single-use plastic water bottles and single use plastics. In fact, plastic bottles are the biggest single component of park solid waste streams. Parks have a long history of attempting to deal with this problem which has been complicated by changing administrations with different priorities. Our concern is that the ten-year phase out does not go far enough and that any new park policy can again be reversed.



Public Employees for Environmental Responsibility, GreenLatinos and Beyond Plastics are working to combat the tsunami of plastic waste flooding our national parks and support the direction of park superintendents. We submit this rulemaking request that the Interior Department:

1. Prioritize National Parks units in the plastic reduction strategy
2. Eliminate the sale of single-use plastic and plastic water bottles in every national park unit by June 8, 2024;
3. Cut plastics in solid waste streams of all park units by 75% by June 8, 2024; and
4. Require each park to monitor and report its progress in reducing plastics and single-use packaging and products.
5. Ensure that there is safe and clean potable water in National Parks Service facilities.

PLASTIC WASTES ARE BURDENING NATIONAL PARKS SO IT IS IMPORTANT TO PRIORITIZE NATIONAL PARKS IN THE ADMINISTRATION'S WASTE REDUCTION STRATEGY.

National parks have a conservation mission. NPS leadership should encourage conservation throughout the system in as many ways as possible. As tax-supported institutions, national parks should also explore ways to reduce their direct and indirect impacts on the environment, especially in areas, such as beverage sales, which are peripheral to the park mission.

Please consider the following examples. Grand Canyon National Park moved to end sale of plastic single-use water bottles in 2011 after discovering that such disposable plastic water bottles constituted approximately one-third of that park's entire waste stream, representing 300 tons of garbage required for annual disposal.

At Yellowstone National Park, a 2013 review revealed that plastic water bottles –

- Were 50% of Yellowstone's solid waste load;
- Were the only park waste stream that is increasing on both a percentage basis and in absolute terms; and
- Increasingly end up in park trash even though there are recycling receptacles in some parts of the parks.

While national park visitation fell in the 2020 pandemic year to approximately 200 million visitors, that number is expected to climb to levels in excess of 300 million (levels experienced in 2018 and 2019) this year and beyond. The solid waste burden created by that volume of visitors is expected to grow, absent changes in national park management policies.

Most importantly, environmental justice requires the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and

policies. The proposed rule can and should improve public health and the environment and the overall well-being of all communities. It is a step forward in efforts to right past wrongs and move toward environmental justice.

PARKS NEED NATIONAL, SYSTEM-WIDE GUIDANCE

The National Park System is a decentralized collection of park units. The operation of each park unit is usually solely the task of that park's administration rather than part of a centralized system where park operations are consolidated into larger subunits.

In order to affect practices in all individual parks, a national mandate and program will be required. The implementation of Policy Memorandum 11-03 illustrates this point. This 2011 policy set the conditions under which parks could go plastic-free. In the months following that new policy, only three parks banned plastic water bottle sales. In the next year, three more parks adopted such bans. The following year was a watershed in which 17 parks also adopted bans.

This total of 23 parks with bans by the end of 2014 plateaued thereafter. That number had not grown by the time NPS Policy Memorandum 11-03 was rescinded in 2017.

The limited experience that NPS had with plastic bottle bans was overwhelmingly positive, prompted little visitor complaint, and significantly reduced park solid waste streams. Much more could be accomplished with a system-wide approach to ban water bottle and single use plastic sales bans, overall plastic load reduction goals, and a required management focus on reducing parks' waste, carbon, and energy footprints.

We urge you to adopt these recommendations to further the mission of the national park system.

Sincerely,

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Petition for Rulemaking: Plastic-Free National Parks

PEER, pursuant to the Administrative Procedures Act (16 U.S.C. 553 (e)) and Department of the Interior regulations (43 C.F.R. Part 14), hereby petitions the NPS to govern through rulemaking its contribution to global and local plastic pollution by eliminating sale of plastic single-use water bottles and reducing the plastic waste at each Park Unit.

The Administrative Procedures Act directs that “[E]ach agency (of the Federal Government) shall give an interested person the right to petition for the issuance...of a rule.” 5 U.S.C. 553.

Standing to File

PEER is an IRS 501(c)(3) non-profit organization incorporated under the laws of the District of Columbia. PEER serves the professional needs of the local, state, and federal employees – the scientists, hydrologists, biologists, and rangers – charged with the protection of America’s environmental resources, including the resources within the national park system. As such, PEER is “an interested person” under the Administrative Procedures Act.

GreenLatinos is a national non-profit organization that convenes an active comunidad of Latino/a/x leaders, emboldened by the power and wisdom of our culture, united to demand equity and dismantle racism, resourced to win our environmental, conservation, and climate justice battles, and driven to secure our political, economic, cultural, and environmental liberation.

Beyond Plastics is a nationwide project that pairs the wisdom and experience of environmental policy experts with the energy and creativity of college students to build a vibrant and effective anti-plastics movement. Our mission is to end plastic pollution by being a catalyst for change at every level of our society.

Appendix

PROPOSED RULES

1. Subsection (c) to be added to 36 CFR 5.15 (Plastic Disposable Water Bottles and Single Use Plastics), to read:

(a)...

(b)...

(c) Each Superintendent shall prohibit the sale of water in disposable plastic containers and single use plastics in any facility in a national park system unit where a concessionaire or other NPS-approved vendor, including commercially operated vending machines, offering beverages for sale to the public. This prohibition will occur within one year of the adoption of this paragraph

2. A new Director's Order (#96: Plastic Reduction and Elimination) is adopted, to read:

DIRECTOR'S ORDER #96: Plastic Reduction and Elimination

It is the policy of the National Park Service that all park superintendents and our park partners strive to shrink their environmental, carbon and energy footprints and, where possible, eliminate the sale of disposable plastic bottles and reduce the amount of plastic in park waste streams.

- a. Bottle and Single Use Plastic Ban.** Each superintendent will require concession operators to halt the sale of disposable plastic water bottles and single use plastics. Each superintendent will require concession operators to sell reusable water bottles.
- b. Filling Stations.** Each superintendent shall ensure that there are adequate sources of free potable water available for park visitors and appropriate signage directing visitors to such facilities.
- c. System Goal.** The national park system shall strive to reduce its environmental, carbon, and energy footprints. As part of this goal, NPS shall strive to eliminate plastics in solid waste streams of all park units by the end of 2024.
- d. Waste Report Card.** Each superintendent shall monitor the solid waste stream for that park unit and annually post on its website the components, size, as well as direct and indirect costs of its solid waste stream on an annual basis.