



## International Dark-Sky Association

*"...to preserve and protect the nighttime environment and our heritage of dark skies through environmentally responsible outdoor lighting."*

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**Executive Director**  
Bob Parks

**Emeritus**  
David L. Crawford, PhD

### **RE: EPA-HQ-OAR-2007-0492 Second Draft Document Related to the Review of the National Ambient Air Quality Standards for Particulate Matter**

Thank you for the opportunity to comment on this report. My comments are in reference to skyglow and Light Pollution included in the report.

Page 1-15 mentions "Because the nature of visibility impairment and its impact on the public welfare is sufficiently different and less well understood at night, this assessment only considers visibility conditions that occur during daylight hours."

I am concerned the EPA is dismissing nighttime visibility and atmospheric discoloration of the night sky from anthropogenic sources as simply not understood. The EPA needs to acknowledge that its deciview metric and visibility impairment assessment do not attempt to evaluate anthropogenic light at night in the scenic vista. Deficiencies in the metric should be identified. Should these deficiencies be identified and remedied with additional monitoring equipment such as sky brightness meters or the National Park Service's Night Sky Teams photographic analysis of various National Parks, policy changes would occur.

This summer EPA has launched [NNEMS Project 2010-115](#) with a project goal to: "The fellow will learn about the effect of air pollutants and artificial lighting on night-sky visibility and how to implement green strategies for reducing light pollution." The final product of the project will be: "The fellow will be expected to develop a final report and to make presentations that summarize the results of activities completed to EPA staff and management, as well as others, as appropriate."

It is my recommendation that the National Ambient Air Quality Standards for Particulate Matter identify the deficiencies in the deciview metric and the final report from NNEMS Project 2010-115 is added as an appendix.

Sincerely,

Robert Wagner  
President, Board of Directors

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