



September 16, 2022

Connecticut

Delaware

District of Columbia

Maine

Maryland

Massachusetts

New Hampshire

New Jersey

New York

Pennsylvania

Penobscot Indian Nation

Rhode Island

St. Regis Mohawk Tribe

Vermont

U.S Environmental Protection Agency  
Attention: Docket ID No. EPA-R02-OAR-2020-0432  
Submitted via <https://www.regulations.gov>

To Whom It May Concern:

The Mid-Atlantic/Northeast Visibility Union (MANE-VU) is pleased to submit comments to the U.S. Environmental Protection Agency (EPA) on its Proposed Rule entitled *Approval and Promulgation of Air Quality Implementation Plan; New Jersey; Regional Haze State Implementation Plan for the Second Implementation Period* [(87 FR 51016 (August 19, 2022))].

MANE-VU supports EPA's proposal to approve New Jersey's regional haze state implementation plan (SIP) submitted on March 26, 2020, and supplemented on September 8, 2020, and April 1, 2021, as satisfying applicable requirements under the Clean Air Act (CAA) and EPA's Regional Haze Rule (RHR) for the second implementation period of the regional haze program. MANE-VU agrees that New Jersey's SIP submission meets the requirements of CAA sections 169A and 169B and the RHR at 40 CFR 51.308. MANE-VU appreciates EPA's careful evaluation of New Jersey's SIP submittal, as well as the constructive input and review that the federal land managers provided to New Jersey and the other MANE-VU states as they developed their regional haze SIPs. MANE-VU notes that not only does reducing haze-forming pollutants improve scenic vistas in our national parks and wilderness areas, it also has economic and other co-benefits for improving public health and ecosystems.

New Jersey is a member of the MANE-VU Regional Planning Organization and coordinated with MANE-VU and its member agencies on the regional approach and technical analyses to develop its long-term strategy for making progress towards the national visibility goal. MANE-VU supports EPA's thorough approach in reviewing New Jersey's SIP, including its response to each MANE-VU Ask. We expect EPA will review other states' responses to the MANE-VU Ask in a similar manner, including states outside the MANE-VU region, particularly those found by MANE-VU technical analysis to be reasonably anticipated to contribute to visibility impairment at one or more of MANE-VU's Class I areas (please see the attachment).

MANE-VU recognizes New Jersey's significant efforts to reduce emissions of visibility-impairing pollutants at the Brigantine Wilderness Area and other nearby Class I Areas, and its leadership role within MANE-VU in supporting haze SIP development across the region. As such, we view EPA's proposed

MANE-VU Class I Areas

Acadia National Park  
Maine

Brigantine Wilderness  
New Jersey

Great Gulf Wilderness  
New Hampshire

Lye Brook Wilderness  
Vermont

Moosehorn Wilderness  
Maine

Presidential Range  
Dry River Wilderness  
New Hampshire

Roosevelt Campobello  
International Park  
Maine/New Brunswick,  
Canada

approval of New Jersey's haze SIP as affirmation of MANE-VU's collective work in support of its members' haze SIPs, and New Jersey's important role in that effort.

If you would like further clarification or discussion on any of these comments, please contact the MANE-VU Lead Manager Paul Miller ([pmiller@nescaum.org](mailto:pmiller@nescaum.org)) or the co-chairs of the MANE-VU Technical Support Committee, Sharon Davis of the New Jersey Department of Environmental Protection ([sharon.davis@dep.nj.gov](mailto:sharon.davis@dep.nj.gov)) and David Healy of the New Hampshire Department of Environmental Services ([david.s.healy@des.nh.gov](mailto:david.s.healy@des.nh.gov)).

Sincerely,

/s/ Sharon Davis, New Jersey Department of Environmental Protection

/s/ David Healy, New Hampshire Department of Environmental Services

Co-Chairs, MANE-VU Technical Support Committee

cc: MANE-VU Directors

Attachment: Listing of states found by MANE-VU technical analysis to be reasonably anticipated to contribute to visibility impairment at one or more MANE-VU Class I areas

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<u>RPO</u>	<u>State</u>
LADCO	Illinois
	Indiana
	Michigan
	Ohio
SESARM	Alabama
	Florida
	Kentucky
	N. Carolina
	Tennessee
	Virginia
	W. Virginia
CENSARA	Louisiana
	Missouri
	Texas

Source: MANE-VU, *Selection of States for MANE-VU Regional Haze Consultation (2018)*, MANE-VU Technical Support Committee (September 5, 2017), <https://otcair.org/manevu/Upload/Publication/Reports/MANE-VU%20Contributing%20State%20Analysis%20Final.pdf>.