

February 9, 2024

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

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

U.S Environmental Protection Agency  
Attention: Docket ID No. EPA-R01-OAR-2023-0185  
Submitted via <https://www.regulations.gov>

To Whom It May Concern:

The Mid-Atlantic/Northeast Visibility Union (MANEVU) 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 Plans; Massachusetts; Regional Haze State Implementation Plan for the Second Implementation Period* [89 FR 1482 (January 10, 2024)].

MANEVU supports EPA's proposal to approve Massachusetts' regional haze state implementation plan (SIP) submitted on July 22, 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. MANEVU agrees that Massachusetts' SIP submission meets the requirements of CAA sections 169A and 169B and the RHR at 40 CFR 51.308. MANEVU appreciates EPA's careful evaluation of Massachusetts' SIP submittal, as well as the constructive input and review that the federal land managers provided to Massachusetts and the other MANEVU states as they developed their regional haze SIPs. MANEVU 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.

Massachusetts is a member of the MANEVU Regional Planning Organization and coordinated with MANEVU 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. MANEVU supports EPA's thorough approach in reviewing Massachusetts' SIP, including its response to each MANEVU Ask. We expect EPA will review other states' responses to the MANEVU Ask in a similar manner, including states outside the MANEVU region, particularly those found by MANEVU technical analysis to be reasonably anticipated to contribute to visibility impairment at one or more of MANEVU's Class I areas (please see the attachment).

MANEVU recognizes Massachusetts' significant efforts to reduce visibility-impairing pollutants at the Great Gulf and Presidential Range-Dry River Wilderness Areas and other nearby Class I areas, and its leadership role within MANEVU in supporting haze SIP development across the region. As such, we view EPA's proposed approval of Massachusetts' haze SIP as affirmation of

MANEVU's collective work in support of its members' haze SIPs, and Massachusetts' important role in that effort.

If you would like further clarification or discussion on any of these comments, please contact the MANEVU Lead Manager Paul Miller ([pmiller@nescaum.org](mailto:pmiller@nescaum.org)) or the co-chairs of the MANEVU 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, MANEVU Technical Support Committee

cc: MANEVU Directors

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

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

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