



April 22, 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

U.S Environmental Protection Agency

Attention: Docket ID No. EPA-R02-OAR-2020-0455

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; New York; Regional Haze State Implementation Plan for the Second Implementation Period* [89 FR 20384 (March 22, 2024)].

MANEVU supports EPA's proposal to approve New York's regional haze state implementation plan (SIP) submitted on May 12, 2020, 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 New York's 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 New York's SIP submittal, as well as the constructive input and review that the federal land managers provided to New York 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.

New York 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 New York's 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's 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 New York's significant efforts to reduce visibility-impairing pollutants at MANEVU Class I 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 New York's

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

haze SIP as affirmation of MANEVU's collective work in support of its members' haze SIPs, and New York's 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) 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) and David Healy of the New Hampshire Department of Environmental Services (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

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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: 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>.