August 16, 2024

U.S Environmental Protection Agency
Attention: Docket ID No. EPA-R01-OAR-2023-0186
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; Connecticut; Regional Haze State Implementation Plan for the Second Implementation Period* [89 FR 58663 (July 19, 2024)]. These comments are the consensus views of the MANEVU non-federal members and are not intended to represent the views of the federal agency partners in MANEVU.

MANEVU supports EPA's proposal to approve Connecticut's regional haze state implementation plan (SIP) revision submitted on January 5, 2022, 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 Connecticut's haze SIP revision meets the requirements of CAA sections 169A and 169B and the RHR at 40 CFR 51.308. MANEVU appreciates EPA's careful evaluation of Connecticut's SIP submittal, as well as the constructive input and review that the federal land managers provided to Connecticut and the other MANEVU states as they developed their regional haze SIPs. MANEVU notes that reducing haze-forming pollutants improves scenic vistas in our national parks and wilderness areas while also providing other economic, ecosystem and public health co-benefits.

Connecticut 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 Connecticut's SIP revision, including its response to each MANEVU Ask. We anticipate 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 Connecticut'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 Connecticut's haze SIP revision as affirmation of MANEVU's collective work in support of its members' haze SIPs, and Connecticut'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 (TSC)

cc: MANEVU Directors
        MANEVU TSC

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

RPO	State
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.