



STATEMENT OF THE MID-ATLANTIC/NORTHEAST VISIBILITY UNION (MANE-VU) STATES CONCERNING A COURSE OF ACTION BY THE ENVIRONMENTAL PROTECTION AGENCY AND FEDERAL LAND MANAGERS TOWARD ASSURING REASONABLE PROGRESS FOR THE SECOND REGIONAL HAZE IMPLEMENTATION PERIOD (2018-2028)

The federal Clean Air Act (CAA) and Regional Haze rule require States that are reasonably anticipated to cause or contribute to impairment of visibility in mandatory Class I Federal areas to implement reasonable measures to reduce visibility impairment within the national parks and wilderness areas designated as mandatory Class I Federal areas. Most pollutants that affect visibility also contribute to ozone, fine particulate and sulfur dioxide (SO₂) air pollution. In order to assure protection of public health and the environment, any additional air pollutant emission reduction measures necessary to meet the 2028 reasonable progress goal for regional haze should be implemented as soon as practicable but no later than 2028.

According to the federal Regional Haze rule (40 CFR 51.308 (f)(2)(i) through (iv)), all states must consider, in their Regional Haze SIP's, the emission reduction measures identified by Class I States as being necessary to make reasonable progress in any Class 1 area. These emission reduction measures are referred to as "Asks." If any State cannot agree with or complete a Class I State's "Asks," the State must describe the actions taken to resolve the disagreement in their Regional Haze SIP.

To address the impact on mandatory Class I Federal areas within the MANE-VU region, the Mid-Atlantic and Northeast States will pursue a coordinated course of action designed to assure reasonable progress toward preventing any future, and remedying any existing impairment of visibility in mandatory Class I Federal areas and to leverage the multi-pollutant benefits that such measures may provide for the protection of public health and the environment. Per the Regional Haze rule, being

Members

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

Nonvoting Members

U.S. Environmental
Protection Agency
National Park Service
U.S. Fish and Wildlife
Service
U.S. Forest Service

MANE-VU Class I Areas

ACADIA NATIONAL PARK ME

BRIGANTINE WILDERNESS
NJ

GREAT GULF WILDERNESS NH

LYE BROOK WILDERNESS
VT

MOOSEHORN WILDERNESS
ME

PRESIDENTIAL RANGE
DRY RIVER WILDERNESS
NH

ROOSEVELT CAMPOBELLO
INTERNATIONAL PARK
ME/NB, CANADA

on or below the uniform rate of progress for a given Class I area is not a factor in deciding if a State needs to undertake reasonable measures.

The transport range of visibility impairing pollutants has been demonstrated to be extensive and well beyond the MANE-VU region. For example, a wildfire near Fort McMurray, Alberta in western Canada last year brought visibility impairing fine particulate matter and ozone over 2000 miles into the region at concentrations that contributed to exceedances of the health standard in some locations. Clearly, states located beyond those that MANE-VU chose to consult for regional haze, can play an active role in impairing visibility at the MANE-VU Class I areas. Further, despite that onroad vehicles produce a significant portion of the visibility impairing pollutants that affect our Class I areas they are beyond our states' ability to regulate. Therefore, the MANE-VU Class I area states need additional help from the Environmental Protection Agency and Federal Land Managers in pursuing important reasonable emission control measures. These include, but are not limited to:

1. Federal Land Managers to consult with MANE-VU Class I area states when scheduling prescribed burns and ensure that these burns do not impact nearby IMPROVE visibility measurements and do not impact potential 20 percent most and least visibility impaired days;
2. EPA to develop measures that will further reduce emissions from heavy-duty onroad vehicles; and
3. EPA to ensure that Class I Area state "Asks" are addressed in "contributing" state SIPs prior to approval. In the case of this "Ask", contributing states are defined as those that the MANE-VU Class I area states requested for consultation.

MANE-VU considers these measures as reasonable and would further visibility improvement in our region's Class I areas.

Signed on behalf of the MANE-VU states and tribal nations:



David Foerter, Executive Director
MANE-VU/OTC

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