



United States
Department of
Agriculture

Forest
Service

White Mountain
National Forest

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File Code: 2580-2

Date: October 2, 2008

Commissioner Thomas Burack
NH Department of Environmental Services
PO Box 95, 29 Hazen Drive
Concord, NH 03302-0095

Dear Commissioner Burack:

On July 21st, 2008, we received a draft implementation plan from the State of New Hampshire that describes your proposal to improve air quality regional haze impacts at mandatory Class I areas in your state. We appreciate the opportunity to work closely with the State through the initial evaluation, development, and now, subsequent review of this plan. Cooperative efforts such as these ensure that, together, we will continue to make progress toward the Clean Air Act's goal of natural visibility conditions at our Class I wilderness areas and parks.

This letter acknowledges that the U.S. Department of Agriculture, U.S. Forest Service has received and conducted a substantive review of your proposed Regional Haze Rule implementation plan. Please note, however, that only the U.S. Environmental Protection Agency (EPA) can make a final determination about the document's completeness, and therefore, only the EPA has the ability to approve the document. The Forest Service's participation in the State of New Hampshire's administrative process does not waive any legal defenses or sovereignty rights it may have under the laws of the United States, including the Clean Air Act and its implementing regulations.

Our review focused on eight basic content areas which reflect priorities for the Forest Service. We have attached comments to this letter. We look forward to your response required by 40 CFR 51.308(i)(3). For further information, please contact Scott Copeland, Regional Haze SIP Review Coordinator, at (307) 332-9737 or Ann Acheson, National Air Program Manager, at (202) 205-0800.

Again, we appreciate the opportunity to work closely with the State of New Hampshire. The Forest Service compliments you on your hard work and dedication to significant improvement in our nation's air quality values and visibility.



If there is anything I can do personally to help coordinate our agencies interaction on this important work please do not hesitate to contact me at 528-8774.

Sincerely,

/s/ Thomas G. Wagner
THOMAS G. WAGNER
Forest Supervisor

cc: Ann Acheson
Scott A Copeland
Livia Crowley
Thomas R Doane

White Mountain National Forest Comments on New Hampshire's Regional Haze State Implementation Plan

Clean Air Interstate Rule (CAIR) Vacatur – New Hampshire Department of Environmental Services (DES) has chosen to submit a draft State Implementation Plan (SIP) which contains language which is heavily dependent on the results of CAIR for emissions projections, reasonable progress goals, etc. The reasons provided for this include the fact that NH DES was not notified by EPA to change its assumptions and that CAIR states are assumed to need to reduce emissions commensurate with CAIR to achieve regional haze and other air quality goals. We support this decision and add the following supporting reasoning:

- NH is not a CAIR state. Hence its proposed control strategies aren't affected by the vacatur.
- NH demonstrates its "fair share" of emissions reductions compared to CAIR states.
- Removing references to CAIR from the SIP would not result in any reductions in impacts at Class I areas. In fact since Best Available Retrofit Technology (BART) controls are to be in effect within 5 years of SIP approval, revising the SIP would actually SLOW controls expected to have a real impact at nearby Class I areas.
- There is no guarantee that the successor to CAIR will be forthcoming any time soon, hence waiting for new modeling efforts could add years to a SIP which is already 7 months late.
- The iterative process of the Regional Haze Rule allows a perfect opportunity for NH to thoroughly review regional haze in a post CAIR world in the 2012 progress report, and **NH should commit to do this.**

Table 10.8 (Page 107) -

Worst Day baseline is 22.8 deciview (dv), Reasonable Progress Goal (RPG) for 2018 is 19.1dv, and Improvement by 2018 is 2.7dv. These numbers do not add up. Is the RPG supposed to be 20.1 or is the improvement supposed to be 3.7 dv?

Agriculture and Forestry Smoke – Suggest changes to last paragraph of p 126 to read:

“Nevertheless, New Hampshire intends to consult with the Forest Protection Bureau of the New Hampshire Department of Agriculture and with the New Hampshire Department of Resources and Economic Development (DRED) to consider smoke management in agricultural and forestry practices to address visibility effects at MANE-VU Class I Areas. The results of these efforts will be documented in the first regional haze SIP progress report in 2012.”

Shifting smoke impacts from clear and hazy days to other days is not consistent with the intent of the Regional Haze Rule, and all nearby Class I areas need to be considered, not just Great Gulf and Presidential Range - Dry River.

PSD as an element of RH SIP –

We feel it would be appropriate for NH DES to discuss the relationship between the Regional Haze Plan and requirements of the Prevention of Significant Deterioration (PSD) program within the SIP. **Specifically, how does NH DES anticipate addressing new sources of air pollution in the PSD process in regards to its reasonable progress goals and long term strategy; and how will it analyze the effects of emissions from these new sources on progress toward the interim visibility goals established under this SIP.**