



United States
Department of
Agriculture

Forest
Service

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Supervisor's Office

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File Code: 2580

Date: February 17, 2009

Mr. Richard A. Valentinetti
Director
Air Pollution Control Division of the Vermont
Department of Environmental Conservation
103 South Main Street, 3 South
Waterbury, VT 05671-0402

Dear Mr. Valentinetti:

On December 18, 2008, the State of Vermont submitted a draft implementation plan describing your proposal to improve air quality regional haze impacts at mandatory Class I areas across your region. 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 Vermont'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.

We have enclosed comments with this letter from the perspective of a Federal Land Manager. We look forward to your response required by 40 CFR 51.308(i)(3). For further information, please contact Ralph Perron at (802) 222-1444 or Scott Copeland at (307) 332-9737.

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

Sincerely,

/s/ Meg Mitchell
MEG MITCHELL
Forest Supervisor

Enclosure



USDA Forest Service Comments Regarding Vermont Draft Regional Haze Rule State Implementation Plan

On December 18, 2008, the State of Vermont submitted a draft Regional Haze Rule State implementation plan (SIP), pursuant to the requirements codified in federal rule at 40 CFR 51.308(i)(2), to the USDA Forest Service (FS). The air program staff of the FS conducted a substantive review of the Vermont draft plan, and have provided the comments listed below. We look forward to the Vermont Air Pollution Control Division response as per section 40 CFR 51.308(i)(3). For further information regarding these comments, please contact Ralph Perron at (802) 222-1444 or Scott Copeland at (307) 332-9737.

Overall Comment

The Vermont Air Pollution Control Division has submitted a well-written draft Regional Haze SIP. The draft SIP addresses several important issue areas as well as acknowledging the many uncertainties faced by MANE-VU in regards to emission inventories, modeling assumptions and modeling results.

Correction

A correction has been addressed regarding the NY Kodak Park Division SO₂ emissions (p. 90), via an email with Ms. Heidi Hales.

Monitoring Strategy

In Section 5.3, Lye Brook Wilderness Monitoring Strategy, we feel that a haze camera would be a beneficial addition to the monitoring site. A haze camera has the benefit of providing a picture every 15 minutes, accessed through a public web site, of the conditions on site, which are instantly understood by the lay person, as well as the scientist. Understanding the limitations of budgetary constraints, a future consideration might include one haze camera which is shared by multiple Class I areas. The camera could be located at Lye Brook for a one or two year period. The camera could then go to another Class I area, and at a future time return to Lye Brook.