

October 7, 2015

Administrator Gina McCarthy
Environmental Protection Agency
1200 Pennsylvania Ave, N.W.
Washington, DC 20460

Re: Request to strengthen the Regional Haze Rule

Dear Administrator McCarthy:

On behalf of the 83 undersigned conservation and public interest organizations, and our millions of members and supporters, we urge you to strengthen the Clean Air Act's Regional Haze Rule to restore clean air to national parks and wilderness areas and their neighboring communities. While our groups actively support the Clean Power Plan, stronger ozone standards and other fundamental air programs, we know that these rules alone will not result in the cleanup of many sources of pollution impacting parks and wilderness areas. We implore you to deliver on the nearly 40 year old legislative promise to return natural air quality to the nation's most cherished public places by establishing a clear path to clean air now.

From Yosemite to Everglades National Parks and Shining Rock to John Muir Wildernesses, these truly are some of our nation's greatest places. National parks alone provided sanctuary, retreat, and adventure for over 282 million visitors and 64 million kids last year. Clean air laws require the most iconic national parks and wildernesses to have the best air quality in the country, yet many of them struggle with dirty air that mars scenic views, hurts peoples' lungs, and stresses wildlife and ecosystems.

We commend the administration's leadership on the Regional Haze Rule implementation to-date as it has resulted in critical air quality improvements for national parks, wildernesses, and surrounding communities. Regional haze implementation plans have led to more than 500,000 tons a year of reduced sulfur dioxide and nitrogen oxides emissions from sources in areas west of the Mississippi River alone. Across the country, haze plans have resulted in more than 52 million metric tons of carbon dioxide reductions annually through industry decisions to retire aged coal plants instead of installing required emission controls.

However, flaws in the rule allow polluters to evade clean up requirements and make uncertain whether and when clean, natural air quality will be achieved. Current projections show that if swifter emission reductions are not required, many national parks and wilderness areas will not achieve the regulatory goal of restoring natural air quality by 2064. In fact, many parks will not achieve the target for decades or centuries after the goal. For example, absent stronger rule requirements, Yosemite will likely miss the 2064 natural air goal by a century.

Strengthening the Regional Haze Rule in strategic ways will ensure that states and polluters are held accountable for reducing their fair share of park and wilderness pollution in the coming years. Clean up of pollution sources like coal plants, vehicles, diesel engines, oil and gas facilities, and other industries that impair park and wilderness air quality are necessary in order

to return clean air to the nation's gems and provide important public health co-benefits especially to disproportionately impacted communities of color, indigenous, and low-income populations.

Specifically, we call on EPA to:

- **Set National Parks and Wildernesses on a Clear Path to Clean Air.** Establish that each state has an independent responsibility to reduce pollution that contributes to air quality impairment at protected places to make reasonable progress towards achieving the national goal.
- **Provide Certainty.** Ensure that natural air quality goals be reached by establishing reasonable progress requirements that specifies what states and polluters must do to clean up their share of each park and wilderness area's pollution for every ten year planning period.
- **Strengthen Accountability.** Measure the success of a state's pollution reduction plan against emissions they can control, which will result in meeting the clean air goal. If a state projects its plan will fall short of the 2064 goal, require a technical demonstration to show that reductions needed to meet the goal are infeasible.
- **Strengthen Federal Land Managers' Voice.** The staff at the National Park Service, the Forest Service, and other federal and tribal agencies know these public lands better than anyone. They need to have a stronger role in the process of identifying pollution problems and developing clean air restoration plans.

In the spirit of the Centennial anniversary of the National Park System in 2016, *please use your leadership to ensure that this essential clean air rule gives national parks, wildernesses, and their millions of visitors the gift of clean, healthy air in the next decade and for generations to come.* We ask that you act promptly, making needed changes to the Regional Haze Rule including reasonable progress requirements to establish a certain clean air future for these special places. By acting to achieve clean air in national parks and wilderness areas, we will make the air safer to breathe and limit air pollution that disproportionately harms certain communities and affects the climate, cities, and all of our families.

Sincerely,

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