



February 28, 2024

Jeff Hunt
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Submitted electronically via Regulations.gov

Re: Requesting Extension of Comment Period for the Proposed Air Plan Approval; OR; Regional Haze Plan for the Second Implementation Period [Docket No. EPA-R10-OAR-2023-0660]

Dear Mr. Hunt,

On behalf of the National Parks Conservation Association, Earthjustice, and the Coalition to Protect America's National Parks (Environmental Organizations), we request that the Environmental Protection Agency (EPA) grant a 30-day extension on the public comment period for agency's proposal to approve of Oregon's Regional Haze State Implementation Plan for the Second Planning Period (SIP Revision), 89 Fed. Reg. 13,622 (Feb. 23, 2024). We, thus, request that EPA the public comment deadline to Wednesday, April 24, 2024.

National Parks Conservation Association (NPCA) is a national organization whose mission is to protect and enhance America's National Parks for present and future generations. NPCA has over 1.5 million members and supporters nationwide, including more than 31,000 in Oregon. NPCA advocates for strong air quality requirements to protect our parks, including submission of petitions and comments relating to visibility issues, regional haze SIPs, climate change and mercury impacts on parks, and emissions from individual sources of pollution affecting parks and communities. NPCA's members live near, work at, and recreate in all the national parks, including those affected by emissions from Oregon's sources.

The Coalition to Protect America's National Parks is a non-profit organization composed of over 2,100 retired, former, and current employees of the National Park Service (NPS). The Coalition studies, speaks, and acts for the preservation of America's National Park System. As a group, they collectively represent over 40,000 years of experience managing and protecting America's most precious and important natural, cultural, and historic resources.

Earthjustice is a nonprofit public interest environmental law organization that works in partnership with communities and organizations to protect public health and combat climate change.

EPA noticed the comment period on February 23, 2024, and provided interested stakeholders with one month to evaluate and provide comment regarding its proposal to approve of Oregon's SIP Revision. However, in addition to EPA's proposal published in the Federal Register, the regulatory docket for EPA's proposal contains another 181 documents with detailed legal and technical analysis and data.¹ Given the scope, volume, and complexity of this information, the Conservation Organizations believe that the current comment period is not sufficient to fully analyze the potential impacts of agency's proposal to approve of Oregon's SIP Revision and provide meaningful comment. Reviewing EPA's proposal, as well as the extensive legal and technical materials in the regulatory docket, conducting any analysis of our own, and developing comments will take more time than the current comment period allows.

An extension of the comment period will not adversely impact any other party. The current comment period does not afford the Conservation Organizations, or the general public, sufficient time to adequately and thoroughly review EPA's proposal to approve of Oregon's SIP Revision and supporting technical analyses. Conversely, given the scope of the agency's proposal to approve of Oregon's SIP Revision and supporting technical materials, the current deadline for comments will effectively preclude the Conservation Organizations from reviewing all of the relevant material, fully analyzing those voluminous files, and providing meaningful legal and technical comments. Moreover, if finalized, EPA's proposal to approve of Oregon's SIP Revision may adversely affect the Conservation Organizations' interests in achieving pollution reductions and protecting public health and welfare.

We respectfully ask that you grant our request by Monday, March 4, 2024, so that we can adequately evaluate EPA's proposed action.

Respectfully submitted,

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¹ See Env't Prot. Agency, Rulemaking Docket: Air Plan Approval; OR; Regional Haze Second Implementation Period, <https://www.regulations.gov/docket/EPA-R10-OAR-2023-0600/document> (last visited Feb. 27, 2024).