

United States Department of the Interior

Office of the Secretary
Washington, D.C. 20240

Mr. Robert Hodanbosi, Chief
Division of Air Pollution Control
Ohio EPA
Lazarus Government Center
P.O. Box 1049
Columbus, OH 43216-1049

Dear Mr. Hodanbosi:

On September 9, 2008, the State of Ohio 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 all of our most pristine National Parks and Wilderness Areas for future generations.

This letter acknowledges that the U.S. Department of the Interior, National Park Service and U.S. Fish and Wildlife Service have received and conducted a substantive review of the September 9, 2008, proposed Regional Haze Rule implementation plan in fulfillment of your requirements under the federal regulations 40 CFR 51.308(i)(2). As outlined in a letter to each State dated August 1, 2006, our review focused on eight basic content areas. The content areas reflect priorities for the Federal Land Manager agencies, and we have enclosed comments associated with these priorities. We are concerned that your draft plan has substantial shortcomings regarding these priority content areas, and the NPS Air Resources Division staff stands ready to work with you towards resolution of these issues. We ask that your further consult with us on our issues of concern prior to public release.

Our major concern with the plan, as drafted, is that it lacks all the necessary components required by 40 CFR 51.300-308. The plan does not specify the State's regulatory commitments to address visibility protection in Class I areas affected by emissions from within the State. Those omissions make the plan deficient with respect to requirements of the Regional Haze Rule. Please note, however, that only the U.S. Environmental

Protection Agency (EPA) can make a final determination regarding the document's completeness and, therefore, ability to receive federal approval from EPA. For further information, please contact Bruce Polkowsky at (303) 987-6944.

We appreciate the opportunity to work closely with the State of Ohio as it continues to develop its regional haze implementation plan. We share your continued dedication to significant improvement in our nation's air quality values and visibility.

Sincerely,

Lyle Laverty
Assistant Secretary for
Fish and Wildlife and Parks

Enclosure

cc:

bcc:
FWS-AQB: Tim Allen
ARD-DEN: Bruce Polkowsky