



Massachusetts Regional Haze State Implementation Plan Public Hearing, May 11, 2021

- Hello, my name is Lauren Cosgrove. I'm speaking on behalf of the National Parks Conservation Association, as the Senior Northeast Program Manager.
- Thank you to the MA Depart. of Environmental Protection for having this hearing and welcoming me to share my statement on the Draft Regional Haze SIP Revision for 2018-2028. We appreciate your full consideration.
- For years, National Parks Conservation Association (NPCA) and environmental advocates have been working to reduce dirty air in our parks with help from federal policies that protect the air we breathe.
- I work on clean air and climate change issues in the 49 northeast national parks, including the National Parks of Boston, and the dozens of others throughout the State of Massachusetts, New England and the tri-state area.
- Today, air pollution remains one of the most serious threats facing national parks, threatening the health of park visitors, wildlife and neighboring communities and compromising our views with hazy skies.
- While most haze pollution does not originate in national parks, it can travel hundreds of miles from its source, thereby affecting parks and nearby communities.
 - o In fact, [nearly 90% of national parks](#) are plagued by haze pollution, and on average, park visitors miss out on 50 miles of scenery because of haze — a distance equal to the length of Rhode Island.
- Poor air quality in our national parks also threatens our economies. Our national parks provide nearly \$42 billion in economic benefit and support hundreds of thousands of jobs across the country each year. Without strong safeguards protecting the air we breathe, we can't keep these places and local economies strong, let alone keep people healthy.
- The Clean Air Act's Regional Haze Rule is a time-tested, effective program intended to protect national parks and wilderness areas from air pollution. It has resulted in real, measurable and noticeable improvements in national park visibility and air quality.
- Despite the great strides that have been made, the State of Massachusetts has proposed a regional haze plan that does not meet regional haze requirements of the Federal Clean Air Act, §169A - §169B and the United States EPA Regional Haze Rule for the second planning period.

- It lacks significant protections for Class 1 area like Acadia NP in Maine, other wilderness areas, and communities in the northeast.
- Municipal Waste Combustors, among other sources, currently emit the highest amounts of sulfur dioxide and nitrogen oxides pollution in Massachusetts.
- Despite high level of controllable pollution from these sources and the many opportunities for cost-effective controls, **Massachusetts has failed to select any MWCs for an evaluation of emission reducing measures during this planning period.**
- Given the high levels of NOx (nitrogen oxide) emissions from these facilities and their potential to impact class I areas, we urge MassDEP to do a four factor analysis for these facilities to determine emission reduction requirements.
- MassDEP also failed to select Stony Brook Energy Center in Ludlow, MA for a reasonable progress evaluation.
 - According to the 2017 National Emissions Inventory (NEI), this source emits **564 tons of NOx (nitrogen oxide) per year**. Moreover, emissions from this source have more than double as compared to the last emissions inventory (2014 NEI).
 - We urge MassDEP to do a four factor analysis for the Stony Brook Energy Center facility to determine NOx (nitrogen oxide) emissions reduction requirements.
- NPCA and our allies are poised to work with state agencies and lawmakers, providing data and expertise, to help secure a strong plan to limit haze pollution. Doing so is necessary to restore visibility to our nation's most iconic natural treasures.
- Thank you for your time.