

Appendix O.2

USFS Comments on Draft Prehearing SIP



United States
Department of
Agriculture

Forest
Service

Chattahoochee-Oconee
National Forests
Supervisor's Office

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Gainesville, GA 30501
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File Code: 2580

Date: FEB 25 2009

Mr. Jimmy Johnston
Georgia Department of Natural Resources
Environmental Protection Division
Air Protection Branch
4244 International Parkway, Suite 120
Atlanta, GA 30354



Dear Mr. Johnston:

On December 22, 2008, we received a draft implementation plan from the State of Georgia that describes your proposal to improve air quality regional haze impacts at mandatory Class I areas in your state. We appreciate the opportunity to work closely with your Agency 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 Georgia'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.

Our review focused on eight basic content areas which reflect priorities for the Forest Service. We have attached comments to this letter. We look forward to your response required by 40 CFR 51.308(i)(3). For further information, please contact Bill Jackson, Air Quality Specialist, at (828) 257-4815.

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

Sincerely,

GEORGE M. BAIN
Forest Supervisor

cc: Ann Acheson, Ray M Ellis



**Chattahoochee and Oconee National Forests Comments
Georgia Regional Haze State Implementation Plan (SIP)**

1. page V – For the 20 percent worst days the Reasonable Progress goal should be 7.45 and not 7.47; and the deciview (dv) improvement needed by 2064 should be 12.02 dv and not 12.00.
2. page 4 – Joyce Kilmer, Tennessee should be identified as Joyce Kilmer – Slickrock Wilderness Area, North Carolina and Tennessee.
3. page 6 (2nd paragraph) – Here and elsewhere in the document the following statement can be removed: “Note that on July 11, 2008 ...”
4. page 11 – We concur with using the New IMPROVE equation.
5. page 12 (1st paragraph) – We would recommend the following phrase, “The 20 percent best visibility days at the Southern Appalachian sites ...” be changed to “The 20 percent best visibility days at Cohutta Wilderness ...”
6. page 14 (1st paragraph) – Should read as “... wildfires or prescribed fires.”
7. page 15 (3rd paragraph) – Please add to the end of the 1st sentence “... in comparison to the former IMPROVE equation.”
8. page 17 – The values in Figure 3.1-1 should be listed to only two decimal places.
9. page 24 – there is no image on Figure 4.2-1. (SO₂ emissions in 2002 in the VISTAS States).
10. page 40 – We recognize the lack of IMPROVE data contributed to assessing model performance at Cohutta Wilderness and we concur with the methods in Appendix B to substitute data from Great Smoky Mountains National Park on the days the Cohutta monitoring site was missing data.
11. page 46 – We are recommending that the Smoke Management Plan (SMP) document should not be included in Appendix H.10, but instead a reference should be made (as was done on page 103) that Georgia does operate under a SMP. Our concern is that Georgia may lose maximum flexibility to modify the SMP on an as needed basis without having to go through a SIP revision, or waiting for long periods of evaluation such as prescribed by the Regional Haze review cycle. As stated in the pre-draft SIP, we concur with your finding that wildland fire emissions are not a significant contributor to visibility impairment at the Class I areas and further emission reduction techniques from prescribed fires are not needed before 2018. Based upon this finding, it appears the current prescribed fire smoke management techniques implemented in Georgia are adequate to protect visibility in the Class I areas. If you concur, we suggest your agency note this



finding in the final SIP. Also, you may want to note that your agency and the Georgia prescribed fire community are continuing to work together to refine the smoke management techniques to address ecological, human health and welfare needs.

12. page 50 – Figure 7.2.4-1 please remove “ew IMPROVE Al_orith” from the graphic.
13. page 70 (1st paragraph) – Please delete the words “... most current ...” and just say “... were developed using the Base G VISTAS 2002 base year ...”
14. We are recommending the VISTAS Area of Influence (AOI) electronic spreadsheet that includes all sources be included in the Appendices. Appendix H.5 only includes the BART eligible sources.
15. We agree that the Reasonable Progress approach used in this first Regional Haze SIP is a good approach and we appreciate the State of Georgia utilizing a lower Q/d (source emissions divided by distance to the Class I area) value in comparison to other southeastern states.
16. The pre-draft SIP does not discuss how emissions from all significant stationary sources in Georgia will affect visibility in Class I areas outside of Georgia; specifically Joyce Kilmer-Slickrock, Linville Gorge, Shining Rock and Sipsey Wildernesses. The information is contained in the VISTAS Area of Influence (AOI) analyses and it would be appropriate to discuss how emission changes planned for all of Georgia sources (not only BART sources) will affect visibility at Class I areas in other states. There are three sections of the Regional Haze Rule that we believe support our request:
 - a. 51.308 (d)(3) Long term strategy. "Each State... must submit a long-term strategy that addresses regional haze visibility impairment...for each mandatory Class I Federal area located outside the State which may be affected by emissions from the State. The long-term strategy must include enforceable emissions limitations, compliance schedules, and other measures as necessary to achieve the reasonable progress goals established by States having mandatory Class I Federal areas."
 - b. 51.308 (d) (3) (i) "Where the State has emissions that are reasonably anticipated to contribute to visibility impairment in any ... Class I area located in another State..., the State must consult with the other State(s) in order to develop coordinated emission management strategies."
 - c. 51.308 (d) (3) (ii) "If the State has participated in a regional planning process, the State must ensure it has included all measures needed to achieve its apportionment of emission reduction obligations agreed upon through that process."

Section 10, ‘InterState Consultation’, should include a list of Georgia sources the AOI identified as having a potential to impact the Class I areas in Alabama and North

Carolina. The list also needs to include the pollution reductions that are anticipated at each source before 2018.

17. page 114 – We are recommending that the year the first 5-year progress report will be completed also be included in the first paragraph.