



Public Hearing Testimony on Minnesota Draft Regional Haze State Implementation Plan for the Second Implementation Period

Christine Goepfert, National Parks Conservation Association

September 22, 2022

Good afternoon, my name is Christine Goepfert and I am the Midwest Campaign Director at National Parks Conservation Association (NPCA). I am based in the Twin Cities where we've had a field office for more than a decade. Thank you for the opportunity to comment today on Minnesota's Draft Regional Haze State Implementation Plan for the Second Implementation Period.

NPCA is the oldest and largest nonpartisan, nonprofit advocacy organization for our national parks. We have over 1.7 million members and supporters across the country with over 31,000 here in Minnesota.

Minnesota has two Class 1 areas:

- Voyageurs National Park, which hosts more than 243,000 visitors a year and supports over \$21 million in visitor spending in Minnesota; and
- Boundary Waters Canoe Area Wilderness, which saw over 166,000 visitors in 2021 per the U.S. Forest Service.

Over the decades, haze from cars and trucks, taconite facilities, coal-fired power plants and other industrial sources has degraded visibility and dirtied our air, harming people's health in our national parks and local communities. Today, air pollution remains one of the most serious threats facing national parks and driving climate change.

NPCA commends the Minnesota Pollution Control Agency (MPCA) for proposing a technically sound regional haze plan for this planning period. MPCA had a robust source selection process, a strong commitment to working with the National Park Service and other federal land managers throughout the consultation process, rejected international endpoint adjustments, and used a good initial screening cost threshold.

However, there are still things that MPCA could improve upon to ensure the strongest regional haze State Implementation Plan (SIP) is submitted to the EPA for approval.

MPCA selected but failed to require four-factor analyses from taconite facilities. MPCA should evaluate and require pollution control improvements at all the taconite facilities they initially selected.

These facilities emit more than 70% of the total haze emissions from Minnesota and not only impact Voyageurs and the Boundary Waters, but also national parks in neighboring states like Isle Royale, Wind Cave, Theodore Roosevelt and Badlands.

Moreover, the taconite facilities are located close to Hibbing, Chisholm, Virginia and Mount Iron, among other communities. These communities are negatively impacted by pollution from the

mining processes at the taconite facilities. MPCA must consider environmental justice factors, which substantiate the need for sharp reductions in the state's haze plan.

Finally, NPCA urges MPCA to require cost-effective controls for the sugar beet processing and paper manufacturing facilities for which the costs were overestimated in the draft SIP. The National Park Service also recommended this, and we wholly support this action.

The Clean Air Act's Regional Haze Rule is an effective program that has resulted in real, measurable, and noticeable improvements in national park visibility and air quality. State Implementation Plans developed under the Regional Haze Rule are an opportunity—and obligation—for states including Minnesota to reduce pollution in their borders to help restore clean and clear skies at protected national parks and wilderness areas, and in our communities.

Thank you for your time today. NPCA will be submitting more detailed technical comments and we forward to reviewing improvements to this plan.