



Re: Requesting Extension of Comment Period for California's Regional Haze State Implementation Plan for the Second Implementation Period.

On behalf of National Parks Conservation Association, we request that the California Air Resources Board grant an extension on the public comment deadline and public hearing date for California's Regional Haze State Implementation Plan ("SIP") for the Second Implementation Period, currently noticed for public comment. Specifically, we ask that the current date of a public hearing, Thursday, June 23, 2022, be extended to the following CARB board meeting date of August 25th, 2022, and the current deadline for written comments, Monday, June 13, 2022, be extended to August 13th, 2022.

For review of the proposed SIP, CARB provided interested stakeholders with just 31 days to evaluate and provide comment regarding hundreds of pages of legal and technical analysis while also failing to provide sufficient data needed to understand emissions and controls from numerous stationary sources in the state. Given the scope, volume, and complexity of this information, as well as the lack of necessary data needed to review the adequacy of existing or planned controls, we believe that the current comment period is not sufficient to fully analyze the potential impacts of the proposed SIP and provide meaningful comment. Reviewing CARB's legal and technical analysis along with its modeling, researching missing data, conducting any analysis of our own, and developing comments merits more time than allowed by the current comment period, which ends on June 13, 2022.

An extension of time will not adversely impact any other party. We understand and appreciate that CARB has provided periodic stakeholder updates throughout the planning process, but we have not had access to the complete draft proposal before now. This extension of the deadline will not prejudice any regulated entity and will not materially affect CARB's ability to submit its SIP to EPA within a reasonable time. This is especially true considering that CARB is already over one year late in submitting a haze SIP to EPA, and EPA is yet to have issued a finding of failure to submit against the state.

Conversely, given the scope and complexity of the proposed SIP, the current deadline for comments will effectively preclude NPCA from researching and reviewing all of the relevant technical data supporting the rule, fully analyzing those voluminous files, and providing meaningful legal and technical comments. Moreover, the short timeframe between the rule announcement and the scheduled June 23rd public hearing simply does not provide sufficient time for the public to analyze the complex proposal, provide meaningful input and arrange for attending the hearing. If finalized, the proposed SIP will adversely affect the NPCA and the public's interests in pollution reduction, the environment, as well the health and welfare of our members and their use and enjoyment of protected national parks and wilderness areas.

Respectfully submitted,

Mark Rose
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National Parks Conservation Association