Society for Conservation Biology North America
The North America Section of a global community of conservation professionals

Submitted via www.regulations.gov on November 21, 2025

The Honorable Lee Zeldin
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W., Washington, DC 20460

Subject: Comment on the Proposed Revisions to the Regional Haze Rule

Dear Administrator Zeldin,

On behalf of the Society for Conservation Biology North America (SCBNA)—part of a global community of nearly 3,000 conservation scientists and practitioners—we submit these comments in strong opposition to the proposed revisions to the Regional Haze Rule that would weaken core visibility protections legally mandated under the Clean Air Act. The Haze Rule was born from Congress's explicit recognition that national visibility, especially in Class I national parks, wilderness areas, and the like, is a public value requiring active protection, and that regional pollution sources directly threaten that value.[8]

The existing Haze Rule has advanced measurable environmental, public health, and economic benefits:

(1) ***Protecting Ecosystems and Wildlife.*** Federal land managers have stressed reducing haze-forming pollutants, including SO_2, NO_x, particulate matter, and VOCs, produce "crossover benefits" that help in protecting environmental health and biodiversity.[1,2] Reductions in sulfur compounds have curbed acid rain that can damage high-elevation forests and acidify streams and lakes. Similarly, cutting NO_x emissions reduces nitrogen deposition, where even moderate increases can drastically affect nutrient-poor (most often alpine) environments by favoring invasive grasses and leaching nitrates into groundwater.[3,4] These systems recover slowly, and any backsliding in required emission reductions may prevent them from ever returning to natural chemical baselines. Since the rule's inception, visibility has improved by more than 25% across monitored parks and wilderness areas, and concurrent reductions in sulfur dioxide (SO_2) and nitrogen oxides (NO_x) have led to documented ecological recovery.[9] In addition, weakening the Haze Rule would slow progress on reducing ozone pollution, a harmful secondary pollutant formed from NO_x and VOCs that damages plant tissues and reduces forest productivity further degrading the ecosystems most impacted by haze pollution are home to many species already under stress from habitat loss and climate change.

(2) ***Protecting Public Health.*** The same fine particulates (sulfates, nitrates, VOCs, etc.) that reduce visibility are also harmful to human health. Medical research continues to find no clear "safe" threshold for air pollution.[5] The Haze Rule has therefore delivered significant public health benefits as a side effect of its visibility goal. Reductions in pollutants have helped avoid premature deaths and illnesses, with "public health for millions of Americans," including park-adjacent communities and Tribal nations.[6]

(3) ***Improving Scenic and Economic Value.*** Clear vistas also contribute to the aesthetic, cultural, and economic value of natural heritage. Clear air in parks improves visitor experiences and sustains tourism, with improvements valued in billions of dollars.[7] The Haze Rule has helped restore scenic integrity and protect tourism-dependent economies.

Rather than curbing this progress, EPA should strengthen implementation, ensure accountability, and maintain the momentum that decades of planning and investment have already built. Weakening core provisions not only contradicts scientific evidence but also risks reversing regional gains.

Consistent with the evidence above, SCBNA opposes the following elements of EPA's proposal:

(1) Exempting states at or below the Uniform Rate of Progress (URP) line from full four-factor source analyses would create perverse incentives for states to avoid meaningful emission controls. The URP line was not intended to be a "safe harbor," since haze is an inherently regional problem, and one state's emissions impair downwind parks.
(2) Creating a "de minimis" threshold that exempts states below an arbitrary cutoff contradicts the Act's requirement to address "*any* impairment" and would allow multiple small contributors to collectively cause significant haze while each avoids action.
(3) Lengthening the planning cycle submissions to 15 years or "as needed" or moving the 2064 natural visibility endpoint will remove the predictable cycles of evaluation, and must not occur unless followed by enforceable emission reductions.
(4) Allowing states to declare victory through the "preservation" category when visibility approaches but does not reach natural conditions would prematurely lock in degraded visibility. Such a category should apply only when natural conditions are fully achieved, with anti-backsliding safeguards in place.
(5) Weakening Federal Land Manager and interstate consultation provisions would remove oversight and coordination mechanisms of science-based haze planning.

The Regional Haze Rule is a proven tool for advancing environmental, public health, and economic benefits. EPA's proposed revisions would reverse decades of progress and sacrifice the ecological health of America's most iconic landscapes. We urge EPA to withdraw the proposed weakening amendments and reaffirm its commitment to restoring natural visibility conditions for the benefit of present and future generations.

Sincerely,

Lauren Jonaitis

Lauren Jonaitis
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References:

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