

**From:** [Rep. Tammie Wilson](#)  
**To:** [Dec Air Comment](#)  
**Cc:** [Achee, Laura A \(DEC\)](#); [Brune, Jason W \(DEC\)](#)  
**Subject:** Serious SIP Formal Comments  
**Date:** Friday, July 26, 2019 9:34:45 AM  
**Attachments:** [Scanned from a Xerox Multifunction Printer.pdf](#)

---

Dear Ms. Heil,

Please accept my formal comments on the Serious SIP.

Thank you for the opportunity to weigh in on this important issue.

Sincerely,  
Tammie

Rep. Tammie Wilson  
State House District #3  
North Pole, AK  
(907) 451-2723

Alaska State Legislature  
House of Representatives  
Representative Tammie Wilson

*Interim*  
301 Santa Claus Lane 3B  
North Pole, Alaska 99705  
Phone - (907) 451-2723

*Session*  
State Capitol Rm 412  
Juneau, AK 99801  
Phone - (907) 465-4797



Rep.Tammie.Wilson@akleg.gov

July 25, 2019

State of Alaska  
Department of Environmental Conservation  
410 Willoughby, Suite 303,  
Juneau, AK 99811

Re: Public Comment on Proposed Regulations and Serious SIP Documents - PM<sub>2.5</sub>

To Whom It May Concern:

Thank you for allowing me to provide my written testimony. I want to commend my constituents for all of the progress they have made, mostly, through voluntary programs. Their progress demonstrates you do not have to fine someone to get their cooperation. Personal contact, providing resources that work, has helped our community to get where we are today, I believe, with our proven success, our constituents can ultimately get to the finish line without additional regulations. Should the EPA allow credit for positive programs at the same level as they do for penalizing one's actions, we could achieve compliance. Although I know these regulations could have been more intrusive, it is hard to comment on many of them because the cost of heating our homes now may be substantially different a year from now. Here are my concerns:

1. Last winter, October 30, 2018 to March 2, 2019, a Stage 1 or Stage 2 was in effect for 71 days out of 104 possible shut-downs. Now these regulations would lower the Stage 1 air alert to 20 micrograms per cubic meter and Stage 2 to 30 micrograms per cubic meter. This would increase the duration of alerts by another 7 to 12 days which would only allow one to burn, without registering their appliance about 21 to 26 days for the entire winter. Although temperatures went as low as negative 45 for a spell many said it was an overall mild winter. How many more shut down days could there be if we have a colder winter? Why would someone want to invest in cleaner technology: like electrostatic precipitators or more efficient stoves, if they will not be able to utilize it but for a short period of time?
2. Heating appliances should be judged on their output not on what source they are utilizing: pellets, wood or coal.
3. Golden Valley Electric Association will be asked to burn No. 1 heating oil on bad air days. Is this in all of their plants? What will the cost be to the consumer? The high cost of energy is what will cause more individuals to switch to solid fuels.

Alaska State Legislature  
House of Representatives  
Representative Tammie Wilson

*Interim*  
301 Santa Claus Lane 3B  
North Pole, Alaska 99705  
Phone - (907) 451-2723

*Session*  
State Capitol Rm 412  
Juneau, AK 99801  
Phone - (907) 465-4797



Rep.Tammie.Wilson@akleg.gov

4. Under an emergency episode it appears that one has 3 hours of the declaration to shut down their stoves. If everyone shuts their stoves down at the same time will that not just pollute the air more? Since the air is stagnant during the winter, will this not cause more days to be in non-compliance? What if you are at work or at school and cannot leave?
5. Commercial wood sellers shall only sell dry wood that is either seasoned, split and stored, covered for at least 9 months, mechanically dried or harvested from an inspected fire killed source that has been split, stacked and stored and confirmed dry prior to freezing. How much will this cost? Where will wood sellers store this wood? I am currently splitting wood that I will not burn until next year that I bought green last year. Why is this the responsibility of the wood seller and not of the individual who is making the determination what to burn? If wood becomes too expensive or hard to get, we have seen in the past that some will burn whatever they can get. There are many that live in my district that must choose heat over food for their family. This regulation will just make it harder and possibly more costly.
6. Wood fired outdoor hydronic heaters must be 330 feet from the closest property line or more than 660 feet from a school, clinic, hospital or senior housing unit. What about the automatic fed units that take wood chips? Do they have the same output as those that use split wood?
7. A temporary waiver may be granted based on financial hardship. What qualifies as a financial hardship? Who verifies the information? Does that information become public if requested?
8. For a new wood stove, pellet stove, and gas insert, installer shall be certified by the National Fireplace Institute. How many individuals in the FNSB are currently certified by this institution? Will the cost be covered by the change out program?
9. Masonry heaters shall be certified by the Masonry Heaters Association. Again, how many individuals in the borough are certified?
10. Any retrofit control devices such as Electrostatic Precipitators shall be professionally installed by certified installers or manufacturer representatives. How many of these professionals exist? Why are you regulating something that is not even being considered as part of this plan?
11. Wood fired devices shall not be the primary or only heat source. We live in Alaska. Really? What if you can't afford another source? What if you have a unit that is cleaner than an oil-fired device?
12. Electrostatic precipitators may be the most affordable and cleanest solution that is immediately available. It is my understanding that they are retrofitted separately for each type of stove and will reduce the PM 2.5 up to 85% of a stove's output. Why would we not include these in the plan? The EPA has done little to nothing to force manufactures to develop more efficient stoves and for someone to change out a stove is costly and most likely does not drop the amount of emission substantially enough to warrant the cost. The

Alaska State Legislature  
House of Representatives  
Representative Tammie Wilson

*Interim*  
301 Santa Claus Lane 3B  
North Pole, Alaska 99705  
Phone - (907) 451-2723

*Session*  
State Capitol Rm 412  
Juneau, AK 99801  
Phone - (907) 465-4797



Rep.Tammie.Wilson@akleg.gov

State needs to push harder for the utilization of these devices and the opportunity for individuals to burn in Stage 1 and Stage 2 if they have these installed.

Looking at the graph within the proposed draft – in 2012 North Pole was at 158.4 and now in 2018 we are at 52.8. If the Commissioners statement is true, a statement I agree with, we have not plateaued. Therefore, I believe if we just continue down the same path we are currently on, we should reach attainment as early as 2021. The EPA needs to give more credit for educational or voluntary programs because we are a good example of how a community working together has achieved the positive results we see today.

If we are not careful and these items in the Serious SIP cost more than anticipated, we could see our community going backwards because as I have said over and over, this is an affordable energy issue; an issue that has yet to be truly addressed. North Pole constituents have shown that by working together, by not using penalties, they can have positive results with more improvements yet to come.

Sincerely,

*Tammie*

Rep. Tammie Wilson