

North Slope Borough

OFFICE OF THE MAYOR

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Harry K. Brower, Jr., Mayor

February 23, 2018

Barbara Trost
Alaska Department of Environmental Conservation
Division of Air Quality
555 Cordova St.
Anchorage AK, 99501

Comments submitted via mail and email at: barbara.trost@alaska.gov

RE: Notice of Request for Comments on Alaska's 2017 Annual Ambient Air Monitoring Network Plan

Dear Ms. Trost:

The North Slope Borough (Borough) appreciates this opportunity to comment on the Alaska Department of Environmental Conservation's (DEC) Draft 2017 Annual Ambient Air Monitoring Network Plan.

We request DEC to add additional monitoring stations to its program in each community on the North Slope. At the very least, we request the addition of monitoring stations within the Prudhoe Bay and Alpine Development regions. Air monitoring stations around Prudhoe Bay and Alpine should be positioned upwind and downwind in order to obtain reliable data due to changes in wind direction. We further request DEC to make information gathered from these stations publically available through the EPA's Air Quality System. Considering the substantial amount of oil and gas activity conducted in these areas, we believe it is reasonable for DEC to expand its program to measure the contribution of emissions from these areas.

The Borough has become increasingly concerned with air quality and emissions from industrial activity. We have received numerous complaints from the residents of Nuiqsut, who are convinced that emissions from Prudhoe Bay and Alpine are contributing to respiratory illnesses within the community. Therefore, we believe this request squarely fits within DEC's criteria on page eight of the monitoring network plan, in particular to: (1) monitor in response to air quality

concerns; and (2) monitor in designated smaller towns and villages that are representative of multiple communities in a region.

Additionally, many Nuiqsut residents have seen a “yellow fog” or “arctic haze” on the horizon in the direction of Prudhoe Bay. On some occasions this fog even surrounds the village of Nuiqsut. This fog is described as a dense yellowish layer, positioned low on the horizon. We have little information as to what this fog is composed of or where it originates. Borough community members need more information and assurances of what is in their air. These issues have pushed many Nuiqsut residents against further oil and gas development. Additional monitoring could go a long way in investigating the issue, leading to enhanced mitigation measures and possibly alleviating concerns.

ConocoPhillips already operates several air monitoring stations in Nuiqsut and Prudhoe Bay. However, Nuiqsut community members are distrustful of this data. They question the locations of the air monitoring stations and their sampling methods. We believe that air monitoring conducted by a public agency, such as DEC, would achieve significantly more community trust than industry data. Therefore, we request that DEC expand its Ambient Air Monitoring Network Plan to allow for additional air monitoring stations and operations in Prudhoe Bay and Alpine.

Conclusion

Thank you for the opportunity to comment on the Draft 2017 Annual Ambient Air Monitoring Network Plan.

Sincerely,



Harry K. Brower, Jr.
Mayor

Cc: Forrest “Deano” Olemaun, CAO
Kenneth Robbins, Advisor to the Mayor
Rosemarie Habeich, Director, Health Department
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