

From: [Donna Gardino](#)
To: [Dec Air Comment](#)
Subject: Comments on the Proposed Serious SIP
Date: Wednesday, July 24, 2019 4:41:58 PM
Attachments: [SIP Comments.pdf](#)

Thank you for the opportunity to comment.

July 23, 2019

Comments on the State of Alaska Air Quality Control Plan

Vol. II: III.D.7.7 Control Strategies

I participated in every Stakeholder Group meeting held in the development of the Control Measures, so my comments are limited. I support the control measures in the SIP but have the following comments, mostly concerned with adequate authority for enforcement and funding. Thank you for the opportunity to comment.

Table 7.7-3

I appreciate the evaluation DEC of the Point Sources and agree that any requirements for new control devices take into account the unique constraints of each producer and the vital services they provide to the community. I do not want to see infeasible restrictions forcing these utilities to close, ultimately leading to higher production of harmful airborne particulates as wood burning would likely increase. Instead I would like to see S2 implemented.

S2 Alternative BACT Banking Fund: If no such fund is being set up by the Point Sources, then it will be necessary for the State of Alaska to fund the control measures, particularly those around the education of the public. See S40 - S50. Although these are non-regulatory, the stakeholder group thought that education was particularly effective if presented in a professional manner. With the state currently trying to alleviate itself of its responsibilities for the health and welfare of the citizens of Alaska, they are forcing the local governments to increase taxes. The control of air quality is not a LOCAL issue. It is a STATE responsibility and should be funded by the state. Acceptable Air Quality is critical to the health and welfare of the citizens of the non-attainment area and it is up to the STATE to fund these responsibilities. Please let me know how the State plans to fund the regulatory and non-regulatory control measures presented in this SIP. Stating that private enterprise, or the local governments or volunteers are going to do it is not acceptable. We have been waiting over a decade. Those avenues have NOT worked. Please also detail the use of CMAQ funds or any other federal funding, if any, to achieve the objectives of this plan.

S17A: Request to Congress and the State of Alaska to fund \$40m, 2-year WSCOP. Who will be writing this request to Congress? If the Congress fails to act, will the State of Alaska provide the funding? If so, what will be the source of these funds. If not, how will this regulatory control measure be funded? This is also considered non-regulatory but is critical to the success of this plan.

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7.7.5.1.6 Compliance and Enforcement (Amendment document) and S34 Adopt legislation giving DEC citation authority: What does "Proposed FNSB resolution" mean under the Proposed to Adopt as BACM column on page 7-15. This should state that the State of Alaska DEC or the Governor's office will put forth a change in legislation to give DEC citation authority. Without citation authority, I believe that enforcement of air quality regulations is less stringent than it was when the FNSB could issue tickets. This is critical to the success of the program in the short term to attain the air quality standard. To say that court action is a tool is misleading as it takes months, if not years, to succeed. That does nothing to improve the air and to correct the violation in the short term. It is the State's responsibility to enforce

the regulations and they must have the authority to do so. The State of Alaska must also provide the necessary funding to do the enforcement. S35 Increase funding for curtailment enforcement is related to this matter. These items must be funded in the operating budget of DEC.

S40 – S50 These are all centered around education regarding air quality and are the responsibility of the State of Alaska, but they are partnering with the FNSB to achieve these goals. I would like to understand how you will accomplish this in the budgetary environment that currently exists. As stated in one of the public presentations on the draft SIP, items like the wood drying kiln were going to be left up to the private sector, per Commissioner Brune, even though it is a “public-private kiln”. Where is the FNSB to obtain the funds for these educational opportunities?

The Fairbanks community has been working collaboratively on additional solutions outside of those proposed in the Serious SIP with the anticipation that these will positively impact air quality. These include:

- Study and use of retrofit control technologies such as Electrostatic Precipitators (ESPs) to reduce particulate discharge at the source.
- A wood kiln to increase availability of dry wood, which will significantly reduce emissions from residential and commercial wood burning.

I am concerned about the proposed motor vehicle emissions budget developed in the Serious SIP for use in air quality conformity. The 2045 Metropolitan Transportation Plan air quality model budgets exceed those proposed in the draft SIP. Given the few transportation control measures in the draft SIP, I am concerned that the proposed budgets in this draft SIP are too aggressive to reasonably meet with future Air Quality conformity efforts. This is a very serious problem and should be analyzed in the context that transportation poses a relatively small contribution to the air quality problem. Please look at revising the proposed emission budgets. I am particularly concerned because the CAFÉ standards under the current administration are at risk. This could directly impact the ability to construct surface transportation improvements in the future.

Lastly, timely submittal of the SIP is very important and diligent progress towards attainment of air quality standards is crucial to the health of our community. At risk, besides the health of our citizens is the implementation of federal highway sanctions due to the late submittal of the SIP. I am concerned, particularly with the lack of a State Capital Budget, that we will lose important federal highway dollars and the improvements to the community and employment these projects provide.

Sincerely,

Donna J. Gardino