
FAST Planning

July 17, 2019

Cindy Heil, Division of Air Quality
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, Alaska 99501

Subject: **Fairbanks PM2.5 Serious Non-attainment Area
Draft State Implementation Plan**

Dear Ms. Heil:

Thank you for the opportunity to review and comment on the Draft State Implementation Plan (SIP) for the Fairbanks PM2.5 Serious Non-attainment Area. Fairbanks Area Surface Transportation (FAST) Planning is the State-designated Metropolitan Planning Organization for the Fairbanks and North Pole area and would like to offer the following comments to the Alaska Department of Environmental Conservation (ADEC) on the Draft Serious SIP:

1. *Proposed Transportation Control Measures* – As proposed in the Draft Serious SIP, FAST Planning supports continuation of the committed Transportation Control Measures from the previous Moderate SIP, including the expanded availability of plug-ins, mass transit system, diesel emission reduction programs, and federal motor vehicle control program. FAST Planning also supports the addition in the Draft Serious SIP of a voluntary measure to convert the transit fleet to compressed natural gas. These measures were implemented under the Moderate SIP and efforts are ongoing. FAST Planning is committed to continuing to partner with ADEC, Alaska Department of Transportation & Public Facilities, and Fairbanks North Star Borough on these measures.
2. *Proposed Motor Vehicle Emission Budgets* – FAST Planning is concerned with the significant reduction in Motor Vehicle Emission Budgets proposed in the Draft Serious SIP. Under the Moderate SIP, the budget was set at 0.33 tons per day of PM2.5 emissions from vehicles for 2017 and later, and FAST Planning has been successful in achieving air quality conformity within this budgeted limit. However, the Draft Serious SIP proposes budget reductions to 0.114 tons in 2020, 0.084 tons in 2023, 0.063 tons in 2026, 0.052 tons in 2029, and 0.038 tons in 2032. These budgets were calculated in part using on-road vehicle activity inputs from FAST Planning's 2045 Metropolitan Transportation Plan travel demand model outputs, which factored in known population growth for our area. We are concerned, however, that any unforeseen growth in our area over the next 20 years will make these budgets unachievable. Also, as detailed in the Draft Serious SIP, on-road mobile sources only account for six-percent of the PM2.5 emissions in our area. Therefore, FAST Planning believes the proposed budgets are too aggressive and ultimately will not lead to an overall significant contribution towards meeting attainment with National Ambient Air Quality Standards. FAST Planning requests ADEC recalculate the proposed Motor Vehicle Emission Budgets to consider these additional factors.

3. *SIP Submittal & Implementation* – FAST Planning encourages timely and complete submittal of the Serious SIP to the EPA and diligent progress towards meeting attainment of air quality standards. In addition to addressing the serious public health concerns related to PM2.5 pollution, our community is at risk of federal highway funding sanctions due to the late submittal of the SIP and attainment within the deadlines set by the EPA. Our community stands to lose over \$30 million annually in federal highway funding unless prompt action is taken. FAST Planning is very concerned about the possibility of sanctions and consequential impact of not being able to meet our community's needs for transportation infrastructure improvements. Please let us know if FAST Planning can be of any assistance to ADEC to help avoid these sanctions.

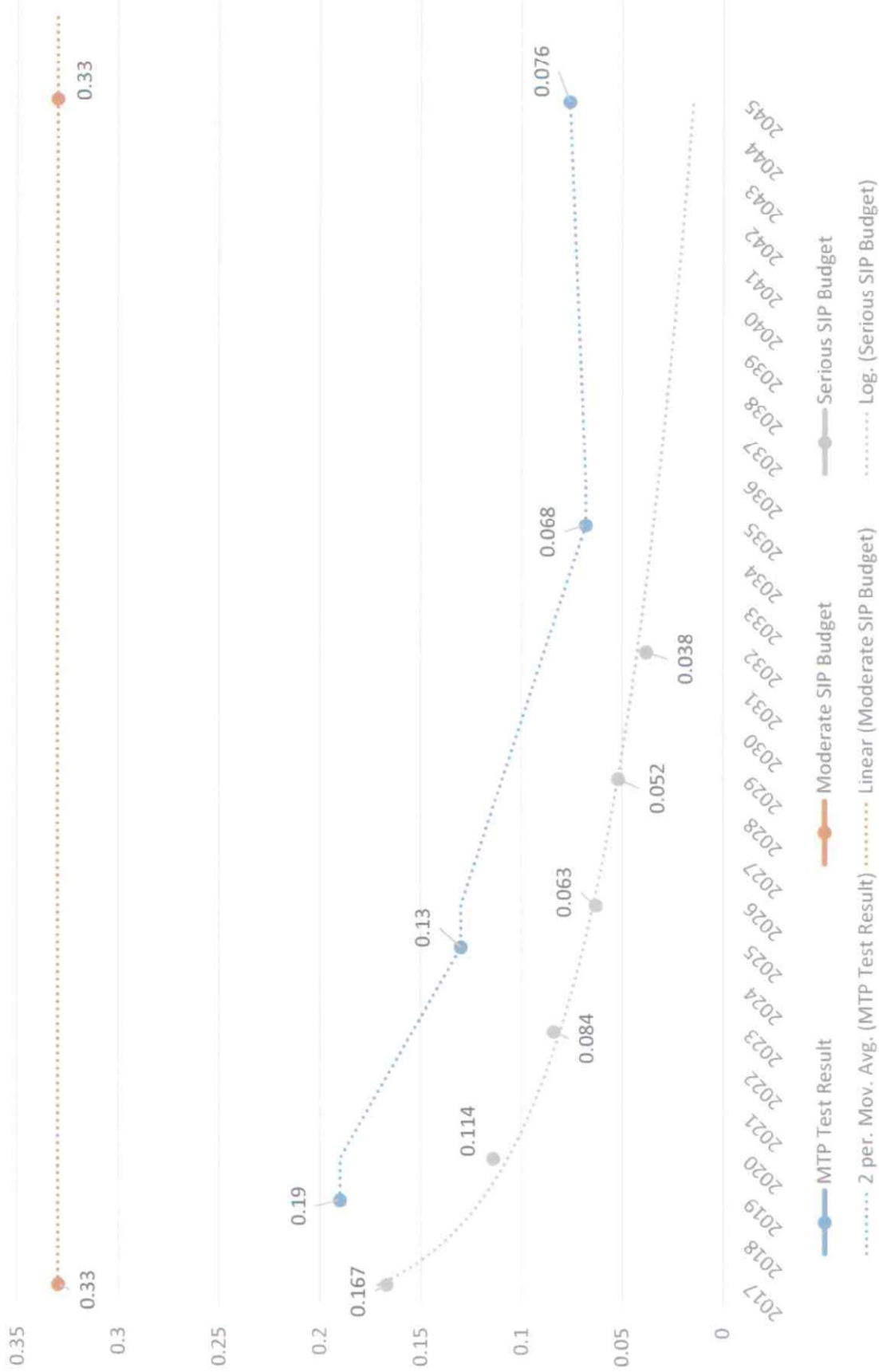
Thank you again for the opportunity to review and comment on the Draft Serious SIP. If you have any questions or need additional information regarding FAST Planning's comments, please reach out our Director, Jackson Fox, at jackson.fox@fastplanning.us or (907) 590-1618.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Anderson", written over a horizontal line.

Ryan Anderson, P.E.
Policy Board Chair

PM2.5 (tons per day)



These measures have already been funded and implemented. Thus, the programs and projects contained in the FMATS 2045 MTP will not affect their timely implementation and therefore the MTP fulfills the applicable TCM implementation requirements under 40 CFR 93.113.

5.2 PM_{2.5} Conformity

Table 5-1 presents results for the conformity emission budget tests for PM_{2.5} and NOx (for the 2006 24-hour standard PM_{2.5} standard) in tons per winter day for each of the analysis years considered.

Table 5-1 PM_{2.5} Conformity Test Results				
Analysis Year	PM _{2.5} (tons per day)	PM _{2.5} Emissions ≤ Budget?	NOx (tons per day)	NOx Emissions ≤ Budget?
Budget	0.33		2.13	
2019	0.19	Yes	1.96	Yes
2025	0.13	Yes	1.40	Yes
2035	0.068	Yes	0.798	Yes
2045	0.076	Yes	0.963	Yes

In accordance with the Transportation Conformity Rule for areas with established SIP-based motor vehicle emission budgets, conformity is demonstrated if the emissions from the proposed transportation system are no greater than the applicable emission budget in a given area. 2045 MTP vehicle emissions were estimated using the latest emissions model consistent with the conformity guidance and SIP budget methodologies. Both PM_{2.5} exhaust and NOx exhaust were estimated for a winter average day, which was used for the 24-hour standard.

As shown in Table 5-1, the MOVES2014b-based modeling results for all analysis years indicated that PM_{2.5} and NOx exhaust emissions for each MTP analysis year are below the applicable budgets for each pollutant across all required analysis years. The MTP therefore satisfies the applicable conformity emission budget tests for the 2006 PM_{2.5} ambient standard.

As all requirements of the Transportation Conformity Rule have been satisfied, a finding of conformity for the new 2006 PM_{2.5} standard is supported for the 2045 Metropolitan Transportation Plan.

5.3 CO Conformity

As noted earlier, Fairbanks is a CO maintenance area with an approved Limited Maintenance Plan. The LMP policy essentially states that vehicle emission budget tests for transportation conformity can be treated as unnecessary because it is not reasonable to expect that an LMP area will experience so much growth during the maintenance period that a violation of the ambient CO standards would occur.