

July 26, 2019

Cindy Heil
Division of Air Quality
ADEC
555 Cordova St, Anchorage AK 99501

Via email dec.air.comment@alaska.gov

Re: Comments supporting draft Serious SIP

Dear Ms. Heil:

Thank you for this opportunity to comment on the *draft* Serious State Implementation Plan for addressing air quality challenges in the Fairbanks area. I support in principle the intent of this plan to address lowering PM_{2.5} to safe levels.

The Fairbanks PM_{2.5} Nonattainment Boundary (Figure 7.3-1) is arbitrary; it overreaches and includes areas beyond the more urban core which do not exhibit any known air quality issues in the winter. For example, I reside in the north-northeast corner of the nonattainment area at a much higher elevation that typically is far above the visible inversion layer seen far below during the winter. This clear air 1,500 feet above sea level is often 10-20 degrees warmer than recorded at the Fairbanks International Airport weather station. I lose some faith in this draft seeing high elevation, low population-density neighborhoods with clean air being included that are far from the areas having the highest levels of PM_{2.5}. This comment applies to higher elevation areas such as north of Goldstream and Chena Hot Springs roads and the west side of the Boundary (Ester and Murphy Domes). Little real improvement of air quality will be gained from enforcing rigid measures in areas not impacted by unhealthy levels of PM_{2.5}; though public support of the plan may be weakened.

The following quote is from Appendix III D.7.3, page D.7.3-18:

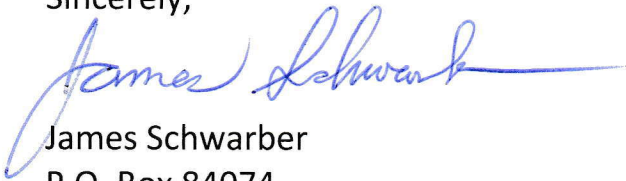
“Summary – High PM_{2.5} days in Fairbanks are the result of very cold surface temperatures and shallow temperature inversions, calm winds creating stagnant conditions and inhibiting the transport and/or dispersion

of pollutants, and local emissions in each community simultaneously producing localized air pollution increases and PM2.5 concentrations high enough to exceed the standard in some areas. These factors indicate that *the emission sources contributing to high pollution concentrations in Fairbanks are fairly localized and that the nonattainment boundary should be constrained to the populated areas where elevated concentrations occur.*" [italic emphasis added]

The Goldstream Zone is sparsely populated and currently there does not appear to be data that this a zone with high levels of PM2.5. Alaska has been losing population over recent years, so any 'growth' expectations need to be done with caution. Please reconsider the need to include these rural areas within the nonattainment boundary. Evidence does not support their inclusion.

Again, I support taking *appropriate* action on this vital issue that affects us all.
Thank you.

Sincerely,



James Schwarber
P.O. Box 84074
Fairbanks, AK 99708