

Fairbanks North Star Borough would never regulate stoves to a point of leaving families without heat. I had an energy audit and the conclusion was the wood stove was an efficient source of heat for my home and I would be a great candidate for a NOASH waiver. I entered into the process cautiously but hopeful. I have children who deserve to have a warm home and electric heat was not effective or economical.

Applying for the waiver became the learning experience of a lifetime. At subzero temperatures I brought my waiver to the Air Quality office with all the necessary paperwork. Photos, signed affidavits, and stack of paperwork that would identify myself as a wood burner. I was at peace with this decision because I feel every person and family has a right to stay warm. I was not breaking the law and was doing my best to work within the parameters set by the local government. Within minutes of arriving my waiver was denied. I had my children with me and I could not believe the words coming from the Air Quality personal. I stood there bewildered as to what I was going to do. I asked what my options were. She pulled out a packet for a wood stove exchange program but quickly explained I would not qualify because my stove was already EPA certified. You see my stove had an emission rating of 3.4 well below the federal standard but too high for the 2.5 set by the borough. The EPA grant does not allow you to switch an EPA certified stove for another EPA certified stove. To me that part made sense. The EPA certified stove I had already qualified to meet a standard. Why would they provide another one? But why couldn't I heat my home? What was I supposed to do? She suggested one of the options was to use an electric space heater. She offered me a 10 day waiver that would allow me to burn while I figured things out.

During the curtailments we used heaters. The temperature dipped to less than 50 degrees in parts of our home. The boys wore mittens and hats and wrapped in blankets next to the heater. This was ridiculous that in Fairbanks Alaska at -30 below I could not keep my home warm even though I had an efficient appliance in my home. The Air quality office made it very clear what my options were. I could apply for a variance or get a new appliance that met the borough standards contacted as many local politicians as I could think of including all three mayor's offices. Lance Roberts reached out immediately and encouraged me to apply for a variance. Mayor Kassel's office had a staff member reach out. This staff member was only able to verify that there was nothing I could do but use an electric space heater for supplemental heat. It's a strange position to be in. Watch my children be cold, owe the electric company a pretty penny, pay the borough a hefty fine or take a leap of faith. I spent several days researching stoves on the internet. I finally found a viable option. Although it would require additional debt I ordered an EPA certified stove that met borough criteria through home depot. I put it on my credit card not knowing when I would be able to pay it off. It would mean my home could be warm for my children.

When I called the air quality office to make sure the stove I was purchasing would meet the NOASH requirements I was advised to apply for a variance while I had my new stove installed. I complied. I dreaded the daily alerts. I stressed for months about what consequences might have come from applying for a waiver. To label myself and family as wood burners. I had the opportunity to share my story so that people would know that residents were suffering from a law that didn't make sense. The mayor was vocal in supporting the solid fuel bans. During my attempts to testify to the hardship this curtail places on families I was met with opposition. People who use solid fuel devices do not need a gathering of politicians with pitch forks and blame. The air quality issues surrounding Fairbanks and North Pole can be blamed on a variety of factors including geography, temperature and inversions. People contribute to the condition of air quality but that contribution is equally shared. Diesel trucks,

boilers, pellet stove and point sources all bare some responsibility but that's part of living in such a harsh climate. Instead of meeting these hardships with unique strategies and resourcefulness the borough decided to reinforce the idea that blame is to be placed solely on the wood burning community.

During the summer months the same individuals who are trying to restrict wood heat during the winter are utilizing camp fires during the summer months for recreation. Almost every resident is a wood burner during the summer and sometimes during the winter utilizing bonfires and camp fires to cook and stay warm. The smell of wood smoke around the camp fire is a predictable and comforting element of outdoor recreation. I have yet to see any PM 2.5 warnings at campsites discouraging use for health risks. Wood heat in Alaska is a culturally relevant practice. Camp fires are recognized as safe and functional but at freezing temperatures to heat a home they supposed to be dangerous for the community. There is something off about that comparison.

The borough has held town hall meetings, air quality meetings and with the help of the ADEC has employed the use of an Air Quality Stakeholder Group. Throughout this journey we have learned that the monitors been placed illogically. Because no one bothered to move them they are now a permanent fixture of misrepresentation of the overall numbers. We have learned that there is little qualitative information to represent the exact reason for the air quality issues. There are many estimated numbers, and qualified individuals who rely heavily on the statement, "we don't currently have that data," to support their reasoning.

Wood heat is a renewable and natural resource. Families have been using wood for thousands of years. Every home once used solid fuel heating devices. We are culture obsessed with reducing waste and using renewable energy. Alaska has always been on the forefront of both renewable and fossil fuel industries. The pioneering spirits shows how resourceful Alaskans. Resident's hall water and live in tiny homes that have a significantly lower carbon foot print than the national average. As the borough dictates how families heat their homes they are also dictating quality of life.

Those families forced to use alternative sources of heat were saddled with higher energy costs. For families afflicted those funds had to come from somewhere. Some families sacrificed activities for their children while others had to reduce their grocery budget. Who is suffering with these restrictions? Families are now colder and hungrier than ever. In a state where mental health and crime is on the rise the borough further reduces a family's ability to provide personal security by eroding their right to heat their homes. When fossil fuel prices once again rise due to a shortage caused by a national disaster or inability to access new sources, where will Alaska be? Our greatest export is also one of our greatest and most expensive import. Years ago, when gas prices soared out of desperation, residents started installing emergency devices. These devices were then fueled with anything that would burn. Firewood theft skyrocketed. This was not a result of ill begotten people but misguided politicians. People will do what they have to do to secure basic needs. I recently learned the term interrupted consumers. Meaning consumers will change patterns based on their needs and affordability

Heat at temperatures below zero is a basic need. Feeding your family is a basic need and if you are using all of your resources to heat your home then you can't eat. If you are not warm you can't do much of

anything else. This goes for children and adults. Instead of decreasing crime we adding risk factors that only continue to escalate the problem. There is a huge push for natural gas currently in the borough. Residents will continue to burn solid fuel as they should. In Alaska residents use wood harvesting as a form of subsistence. There is access and harvesting of lumber from a variety of sources including burn areas. Yes, Alaska has another fire problem. The Federal government manages the subsistence harvest of fish and wildlife for rural Alaskans on Federal public lands and waters. There is a section in the code that represents the use of subsistence. While I don't know if firewood originally the intent was it could be included culturally as the fauna.

In (Section 803), the combined boards recognized that ANILCA called for subsistence use only in areas where such use was "customary and traditional." Given that recognition, they initially defined "subsistence uses" as;

"Customary and traditional uses in Alaska of wild, renewable resources for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation, for the making and selling of handicraft articles out of nonedible byproducts of fish and wildlife resources taken for personal or family consumption, and for the customary trade, barter or sharing for personal or family consumption."

Using firewood is not only renewable its subsistence. According to federal equal rights to these resources. These resources should include would solid fuel devices. There is a culturally relevant way of life. No family should be denied the ability to provide for their family with resources and means they have access to.

The Borough used to have a registration process for vehicles. The emissions from vehicles was suppose to be a top contributor to air quality issues. We no longer have those regulations. According to the Air quality board and EPA speakers those issues sort of took care of themselves over time with increased technology. I wonder if we could use those same concepts to make effective progress over time by justeducating residents about more efficient devices but also offering more affordable efficient devices. I purchased my new device from a local hardware store at very moderate price point. The emissions are significantly less than some of the leading brands sold locally. Nobody wants their neighbor to burn carpet and trash. I don't think any responsible solid fuel burner would endorse those practices. Stereotyping an entire group of people based on some poor choices of a few is never a good idea. Cooperative, collaboration without the restriction to basic needs would be a valued process. I believe while the stakeholder group could be useful it would need to facilitated independently to get attuned results for a community that is divided. The group should not be selected or restricted to the members that are appointed by air quality, the EPA or the ADEC. All these agencies have a vested interest in an outcome. These agencies all lack funding and are using pressure tactics to induce control but so far there has not been funding identified that would support any of these practices which is why borough control has priority.

The homeowners and the residents should have a bigger voice. I was not selected to be a stakeholder but I was given the opportunity to be a proxy via another stakeholder. I have had the opportunity to attend the meetings and interact with the working groups. There is a wide variety of people who attend. The focus is on control measures and how they will be implemented. These stakeholders are given the tasks of assigning value and inclusion into the final product that the ADEC will use to regulate the air quality.

Some suggestions have been made from different sources to use drones, infrared cameras, warrants and other measures to insure compliance. It's unfortunate but I feel the blame will be placed back on Fairbanks when residents are again left restricted in how they can provide for their families. I can picture the EPA and ADEC saying, "well the stakeholders, your community, made these choices." Everyone breathes the air and has a concern about the quality of air but the true cost of not having accurate information and making assumptions about living standards in the borough has a higher price for residents. The interior and especially, North Pole, has additional issues that should take a front seat with the EPA.

Ground water contamination is a huge concern but no community group is beating the drum for investigation or clean up. How many families are using water that has been contaminated by commercial waste or old military equipment disposal. The economy has residents leaving in large numbers and those left behind are struggling. Air quality identified that NOASH waiver has to meet criteria one being financial peace. Qualifying for public assistance or government program would help a family meet that criteria. Already flooded programs like Denali Kid care will only become more congested. The wait time for acceptance into some government programs are over 6 months. A large portion of Alaska is in a perpetual struggle for affordable healthcare.

Another concern is whether this type of regulation could fall under the category of a monopoly. The Borough owns the Interior Natural Gas line and they continue to regulate which sources of fuel can be used. Currently they are in the business of home heating and have the ability to control all the sources through over regulation. The only option left will be natural gas which is owned by the Borough. The exclusive possession or control of the supply of or trade in a commodity or service. Webster's dictionary definition of a monopoly describes; the exclusive possession or control of the supply of or trade in a commodity or service A company or group having exclusive control over a commodity or service. Areas where cable companies operate as monopolies." A commodity or service in the exclusive control of a company or group. "electricity, gas, and water were considered to be natural monopolies"

Although this process is in motion I do believe the EPA, ADEC and air quality need to listen to the families all over the borough who have been affected. I have attached several articles that clearly show that the state uses fire and control burn situations for the benefit of animals and habitat without any concern over the air quality for the human residents but when residents want to heat their homes effectively and efficiently during the cold winter months then there is grave concern over whether this is a breach of regulation.

Being able to heat your home with a device that is safe, feeding your family with means you have access to and having access to clean drinkable water are basic needs that no family should ever have to question. Making an entire community that has been self-reliant unable to provide for their family and forced to use assistance is not what our founding fathers ever envisioned. I ask that you the EPA and ADEC look at the whole picture before over regulating a community and burdening families with unrealistic hardships that are not necessary. A holistic approach to a community issue instead of heavy handed regulation and misguided fear based tactics

"The rights of every man are diminished when the rights of one man are threatened."

— John F. Kennedy

Jennifer Willeford

907-347-5498

<https://akfireinfo.com/2015/04/09/adfg-and-state-forestry-plan-prescribed-burn-for-moose-habitat/>

ADF&G and State Forestry plan prescribed burn for moose habitat

APRIL 9, 2015 BY AKFIREPIOS COMMENTS OFF ON ADF&G AND STATE FORESTRY PLAN PRESCRIBED BURN FOR MOOSE HABITAT

Working collaboratively with the Alaska Department of Natural Resources' Division of Forestry, ADF&G plans to conduct a prescribed fire this May in the Little Granite Creek area near Sutton at mile 64 of the Glenn Highway. Burning mature aspen trees in 314 acres of the Matanuska Valley State Moose Range will encourage regeneration, providing moose forage for 15 years or more. While this is a small scale project with respect to the size of Unit 14A, combined with other projects in the coming years, agency and landowner partnerships can provide for early succession forested stands.

The Alaska Department of Fish and Game (ADF&G) is proactively addressing moose habitat needs in the Matanuska-Susitna Borough. In Game Management Unit 14A, which stretches from Chickaloon to the confluence of the Susitna and Yentna Rivers, moose habitat and forage are shifting as forests regenerate in the wake of the 1996 Miller's Reach wildfire and development expands across the borough. By enhancing habitat over the long term through the use of prescribed fires and mechanical tree cutting projects, ADF&G intends to stimulate hardwood regeneration for moose and other species dependent on early successional habitat.

As part of a long-term, statewide moose habitat enhancement program, the Little Granite Creek prescribed burn may begin as early as May 11, pending conditions. Details on the project are included in the attached flyer. For more information, please contact Sue Rodman at (907) 267-2274 or sue.rodman@alaska.gov.

Outreach_Little Granite Creek Prescribed Burn_20150417

If all of these articles represent government prescribed burns for the benefit of flora and fauna, wildlife and reducing vegetation overgrowth without any implication of air quality concerns then families burning wood in the winter to stay warm should not be an issue at all.

<https://akfireinfo.com/2018/05/08/blm-afs-usarak-conduct-multiple-prescribed-burns-near-fairbanks-and-eileson/>

http://www.adfg.alaska.gov/index.cfm?adfg=wildlifeneews.view_article&articles_id=867

This article states the many benefits of burning without any mention of air quality implications

<https://www.fws.gov/invasives/staffTrainingModule/methods/burning/impacts.html>

<https://spotonalaska.com/ak-arctic/30547/prescribed-burns-planned-near-fairbanks.html>