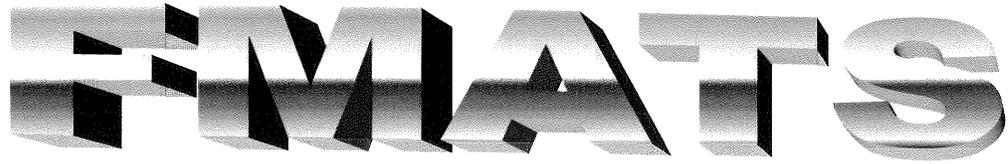


**FAIRBANKS
METROPOLITAN
AREA
TRANSPORTATION
SYSTEM**



September 17, 2008

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Air Docket
Attn: Docket ID No. EPA-HQ-OAR-2007-0562
Environmental Protection Agency
Mail Code 6102T
1200 Pennsylvania Ave, N.W.
Washington, D.C. 20460

RE: Comments on EPA Responses to State and Tribal 2006 24-Hour PM_{2.5} Designation Recommendations

The Fairbanks Metropolitan Area Transportation System (FMATS) wishes to provide comments on the Environmental Protection Agency's (EPA) proposal for a PM_{2.5} non-attainment area designation in the Fairbanks area. FMATS is an ongoing cooperative planning effort between the State of Alaska, the Fairbanks North Star Borough (FNSB), and the Cities of Fairbanks and North Pole. Its mission is to carry out the metropolitan transportation planning process and promote the safe and efficient development of the transportation system.

FMATS is highly concerned that EPA has proposed boundaries for the Fairbanks PM_{2.5} non-attainment area that are substantially larger than those recommended by the state in December 2007. FMATS is currently funding an extensive study to characterize the sources of PM_{2.5} emissions and the extent of the Fairbanks problem area. This \$2.64 million project is underway and will continue throughout the coming winter. Data from this past winter's monitoring effort suggests that some changes to the state proposed boundary may be warranted, but not to the extent that EPA has proposed. We understand that the Alaska Department of Environmental Conservation will be providing that data to you directly and we encourage you to carefully consider that information and work with them to determine a boundary that is based on sound science.

Further, FMATS understands that under Clean Air Act Section 107(d)(1)(B)(i), the designation period can be extended for up to one year if the Administrator needs additional information. FMATS believes that the use of this extension would be warranted based on the significant local efforts to characterize the problem. The FMATS funded project currently underway will bring additional, important information that would substantially assist in the determination of a boundary that will be meaningful and scientifically based. Setting an overly large boundary without meaningful data may undermine public support for the hard choices that the community will face in the future to correct and control this health problem.

Thank you for the opportunity to comment on this important issue.

Sincerely,

Steve Titus, P.E., Chair

cc: Elin Miller, Regional Administrator, EPA Region 10
Krishna Viswanathan, EPA Region 10