

From: [Adena Benn](#)
To: [Dec Air Comment](#)
Subject: Comments re: 2020 DEC Proposed Regulations & SIP - Fairbanks North Star Borough Fine Particulate Matter (PM2.5) 2020 Amendment
Date: Friday, October 23, 2020 10:08:34 AM
Attachments: [image001.png](#)
[R2020-37.pdf](#)

Good Morning,

Attached is Fairbanks North Star Borough Assembly Resolution No. 2020-37, which contains comments pertaining to the FNSB PM2.5 2020 Amendment.

Thank you,

Adena

Adena Benn, CMC | Deputy Clerk
Fairbanks North Star Borough | Clerk's Office
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SERVE ★ LEAD ★ THRIVE
FAIRBANKS NORTH STAR BOROUGH

1 By: Bryce J. Ward, Mayor
2 Introduced: 09/24/2020
3 Advanced: 09/24/2020
4 Adopted: 10/08/2020
5

6 FAIRBANKS NORTH STAR BOROUGH

7
8 RESOLUTION NO. 2020 – 37
9

10 A RESOLUTION SUPPORTING THE ALASKA DEPARTMENT OF ENVIRONMENTAL
11 CONSERVATION'S PROPOSED CHANGES TO REGULATIONS ON AIR QUALITY AND TO
12 THE SERIOUS STATE IMPLEMENTATION PLAN (SIP) FOR THE FAIRBANKS NORTH
13 STAR BOROUGH NONATTAINMENT AREA
14

15 WHEREAS, In 2006, the United States Environmental Protection Agency
16 (EPA) strengthened the 24-hour ambient fine particulate (PM2.5) standard from 65
17 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) to 35 $\mu\text{g}/\text{m}^3$; and
18

19 WHEREAS, In December 2009, the EPA designated part of the Fairbanks
20 North Star Borough (FNSB) a Moderate non-attainment area for the 2006 PM2.5 24-hour
21 standard; and
22

23 WHEREAS, The Clean Air Act (CAA) requires states to submit an air quality
24 attainment plan known as a State Implementation Plan (SIP) to the EPA, which is an
25 enforceable plan developed at the state and local level that explains how an area will
26 comply with air quality standards; and
27

28 WHEREAS, The State of Alaska, Department of Environmental Conservation
29 (ADEC) submitted the Moderate Area SIP to EPA on December 31, 2014; and
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31 WHEREAS, The Moderate Area SIP was an impracticability SIP as it could
32 not demonstrate attainment by the December 31, 2015 attainment date; and
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34 WHEREAS, On December 16, 2016 the EPA published notice in the Federal
35 Register of its intent to reclassify the FNSB non-attainment area from Moderate to Serious
36 status, and the Final Rule was signed on April 28, 2017; and
37

38 WHEREAS, On September 8, 2017, the EPA approved the FNSB PM2.5
39 Moderate Area SIP; and
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41 WHEREAS, On November 19, 2019, ADEC adopted and submitted to EPA
42 the FNSB PM2.5 Serious Area SIP; and

43 WHEREAS, On September 2, 2020, the EPA issued a determination of failure
44 to attain by the attainment date and denial of Serious Area attainment extension request
45 in the Federal Register Vol. 85, No. 171; and
46

47 WHEREAS, The EPA finding of failure to attain and denial of extension
48 request triggered further statutory and regulatory requirements for the area, including a
49 new SIP submission meeting the requirements of Section 189(d) of the CAA by December
50 31, 2020; and
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52 WHEREAS, ADEC is proposing to change regulations on air quality to revise
53 the State Air Quality Control Plan and the Serious SIP for the FNSB nonattainment area
54 ("the 2020 Amendments") in order to demonstrate that the SIP will meet the annual five
55 percent reduction in federal emission requirements identified in the CAA; ADEC worked
56 cooperatively with the FNSB to develop the 2020 Amendments to the Serious SIP to meet
57 the requirements of CAA Section 189(d) and to show that the amendments model
58 attainment by 2024; and
59

60 WHEREAS, The 2020 Amendments were released for public comment on
61 September 10, 2020; and
62

63 WHEREAS, The control measure package as presented in the draft 2020
64 Amendments contain necessary mitigation measures for the residential wood combustion
65 source category, the largest contributor to PM2.5 pollution, and are tailored for the
66 remote sub-arctic environment in Fairbanks; control measures focused on lesser
67 contributing source sectors, such as point sources and residential fuel oil, would have
68 severe economic impacts to the community and are not appropriate at this time.
69

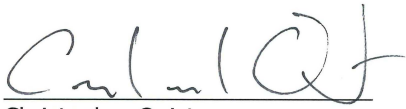
70 NOW THEREFORE BE IT RESOLVED that the Assembly of the Fairbanks
71 North Star Borough fully supports the State of Alaska, Department of Environmental
72 Conservation's 2020 Amendments to the Serious SIP and specifically, the FNSB Assembly
73 supports the control measure package as an effective means to bring the community into
74 attainment.
75

76 BE IT FURTHER RESOLVED that the FNSB Assembly commits to a
77 coordinated effort with the State of Alaska Department of Environmental Conservation to
78 implement the control measure package, committing resources as allowable under FNSB
79 code, with the goal of attaining the 24-hour PM2.5 standard by 2024.
80

81 BE IT FURTHER RESOLVED that upon passage and approval, the FNSB Clerk
82 is directed to send signed copies of this resolution as soon as practicable to the Division
83 of Air Quality, Department of Environmental Conservation.

ADOPTED THE 8TH DAY OF OCTOBER 2020.

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Christopher Quist
Presiding Officer

ATTEST:


April Trickey, CMC
Borough Clerk

Yeses: Lyke, Lojewski, Sanford, Cash, Tomaszewski, Cooper, Williams, O'Neill, Quist
Noes: None