



October 28, 2020

Rebecca Smith
Division of Air Quality
Department of Environmental Conservation
P.O. Box 111800
Juneau, AK 99811-1800
Submitted electronically

Subject: 2020 Amendment to the Serious SIP

Dear Ms. Smith,

The Greater Fairbanks Chamber of Commerce acknowledges the efforts of the Alaska Department of Environmental Conservation (DEC) to improve air quality in Fairbanks within the requirements of the US Environmental Protection Agency (EPA). While we still have some concerns about specific details of the Serious SIP, we thank DEC for their continued efforts to strike a workable balance between the need of all residents to breathe healthy air and the challenges of providing cost-effective heat and power in Interior Alaska.

We are glad to see that the updated modeling done by DEC shows expected attainment of the air quality goals by 2024. This demonstrates the sufficiency of existing control measures in the Serious SIP and shows that DEC was justified in eliminating some suggested control measures from the final plan (such as requiring a switch to ultra-low sulfur diesel). We would have preferred to see this model incorporate expected results from the new Aurora Energy Solutions wood kiln, because this will clearly influence future air quality by increasing access to affordable dry wood in Fairbanks.

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However, we understand that these complex models take time to update. We feel confident that continued improvements to the model and additional local efforts will show even quicker progress towards attainment.

We support DEC's recognition of the economic value of point sources to the Fairbanks community, and the economic infeasibility of requiring Best Available Control Technologies (BACT). We continue to assert that additional control measures are not necessary to achieve attainment, as the data has shown that power generation is not the primary source of airborne particulates in the non-attainment zone. The businesses and residents of the Fairbanks North Star Borough rely on a small number of utilities for heat and power. Each producer provides vital services to the community. We do not want to see infeasible restrictions forcing these utilities to close, ultimately leading to additional harmful particulates as wood burning increases to compensate.

We still have some concern about the criteria being used to determine which wood stoves will be allowed. We recognize the value to the community of solid fuels and support consistent standards for responsible solid fuel use. We would like to see the State continue dialog with the community about the best ways to ensure that Fairbanks area residents are able to both heat their homes and help bring the area into attainment.

The Greater Fairbanks Chamber of Commerce is an independent membership organization representing over 650 business members throughout Interior Alaska. We work to advocate for the best business environment, promote economic strength and growth for interior Alaska, and to develop the resources and networks enterprising people use to share knowledge.

Respectfully,

A handwritten signature in black ink that reads "Marisa Sharrah".

Marisa Sharrah
President/CEO

A handwritten signature in black ink that reads "Sabrina Binkley".

Sabrina Binkley
Board Chair