From: Sam Schwanberg
To: DOH, Air Quality
Subject: Regional Haze Public Comments
Date: Thursday, May 12, 2022 3:20:39 PM

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Dear Director Glatt,

Baseload energy is essential to reliable grid operation at this point in time. The MISO forecast for this summer (2022) is already predicting controlled blackouts with the rise of energy demand and the recent plant shutdowns due to economical hardships (More demand and less supply). As stated in the body of this message below, North Dakota power plants have already spent billions of dollars in emissions controls and they now are among the cleanest in the country. Further implementation of emissions control technology to combat regional haze would be undetectable, unnecessary and ultimately foolish given the current situation that MISO is warning about regarding the energy grid. If we continue down the path of more strict EPA regulations concerning regional haze, the energy grid will only become more unstable as baseload energy generation stations are forced to come offline due to these expensive and inefficient EPA emissions requirements. Thank you for taking a few moments to read over my concerns. I my message is heard and taken into consideration.

Thank you.

As one of the over 14,000 North Dakotans that works in or supports the lignite industry, I am writing to you in support of the North Dakota Department of Environmental Quality (DEQ) State Implementation Plan for Regional Haze. Coal has been and will continue to provide the source of power we can depend on, and it should not be overly burdened with costly and ineffective regulations.

DEQ's visibility plan appropriately recognizes that our industry has significantly invested over $2 billion in the last decade to ensure the state continues to have the cleanest air in the country. These investments reduced emissions by 66% and put the state well ahead of the path to eliminating visibility impairment in its parks by 2064-the goal set by the United States EPA.

State researchers report that wildfires and international emissions are the primary causes of visibility impairment. In 2020, North Dakota experienced long episodes of visibility impairment throughout summer and fall as a result of these emissions, which the state cannot control. Due to the continued drought in far western regions, state experts believe this trend could continue. Costly new regulations imposed on power plants will not address this concern-instead, resources should be dedicated to reducing the fires that are the source of the haze.

I understand DEQ may be under pressure to impose new controls on power plants, even though power plants are not the primary cause of visibility impairment and new controls would not meaningfully improve visibility. Therefore, I urge support for the implementation plan developed by the North Dakota Department of Environmental Quality (DEQ) that ensures our region continues to benefit from clean and clear air along with reliable, affordable electricity supply, today and in the future.

Sincerely,

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