From: Chris Renner
To: DOH, Air Quality
Subject: Regional Haze Public Comments
Date: Thursday, May 12, 2022 4:40:14 PM

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Dear Director Glatt,

I support the state of ND's Regional Haze State Implementation Plan - Round 2. While it may be necessary for the EPA to work with and guide the state of ND, this must only be accomplished within the statutory bonds of ND and the EPA's authority.

The state of ND must reserve its power to create industry-specific rules and standards based on industry, type of fuel, size, design or emission control equipment best suited for the individual unit.

Environmental laws must be geared toward finding technological solutions that are cost effective and innovative. These regulations must be reasonable and based on science rather than cost in their effort to control or cap emissions. These regulations should not be aimed at reshaping ND industry or determining which industries are allowed to exist.

Just as I am committed to a clean environment, I trust the ND Department of Environmental Quality to successfully manage its own Regional haze SIP and help safeguard the health and environment of North Dakota.

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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