From: David Koeller
To: DOH, Air Quality
Subject: Protect North Dakota"s parks from haze pollution
Date: Friday, May 27, 2022 5:58:54 PM

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Dear Director James L. Semerad,

I write today because I deeply value clean air and clear views in national parks and wilderness areas protected under the Regional Haze Rule. I am very disappointed that the Department of Environmental Quality has proposed a Regional Haze plan for the second implementation period is woefully inadequate and fails to require cost-effective controls for polluting coal plants and the oil and gas facilities across the state. The plan is unacceptable and fails to make reasonable progress toward clean air in places like Theodore Roosevelt, Badlands and Voyageurs National Parks, and in our rural and indigenous communities near the polluting facilities and the parks.

Of all the states in our nation, North Dakota has the biggest contribution to haze pollution in National Park Service protected areas, including Theodore Roosevelt National Park, where air quality has degraded steadily since 2016. Our coal plants like Coyote, Antelope Valley and Coal Creek Stations combined with the oil and gas sector emit unacceptable levels of haze-causing air pollution -- more than 72,000 tons combined of sulfur dioxides and nitrogen oxides -- and they must be cleaned up. These facilities have muddied our views, harmed our lungs and obstructed clear night skies for far too long.

I urge you to revise the plan by:
- Implementing strong and significant emission reducing measures for the selected five coal-fired power plants where emissions are long overdue to be cleaned up.
- Requiring emission reductions from the four oil and gas point sources selected, as well as from the oil and gas non-point source emissions like engines and flaring.
- Thoroughly assessing and addressing the environmental justice impacts on our indigenous and local communities.

These revisions will ensure the state is putting parks, people and clean air ahead of polluters' interests and making reasonable progress towards clearer air in our national parks, wilderness areas and communities. The state is obligated to make progress toward improving air quality and limiting haze pollution in Class I areas -- if the plan is left unchanged, it will not comply with the federal Clean Air Act or the EPA's Regional Haze Rule. Our local communities, parks and the people who travel from across the world to visit them deserve better than the current plan.

Thank you,
David Koeller
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