From: Jason Uhlir
To: DOH, Air Quality
Subject: Regional Haze Public Comments
Date: Tuesday, May 17, 2022 10:00:05 AM

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Dear Director Glatt,

As a North Dakotan who has worked his entire career in the field of Safety and Environmental Health, I value and understand the importance of protecting our environment. Adding more environmental regulations on a state that already outperforms others in the Nation in terms of air quality, while producing more energy and agricultural commodities than most other states simply makes no logical sense. Regulations should be necessary, and add value if they are to be created. Added air quality/regional haze regulations in the State of ND fail both need and value tests.

I am 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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