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Governor Mike Dunleavy
STATE OF ALASKA

February 6, 2025

Mr. Dan Opalski
Acting EPA Region 10 Administrator
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

Re: Alaska Governor's Recommendation for PM_{2.5} Annual Area Designation

Dear Mr. Opalski

On behalf of Governor Dunleavy, the Alaska Department of Environmental Conservation provides the following recommendations for designation of areas for the revised annual fine particle air quality standard (PM_{2.5}). Please accept this letter as an initial designation in accordance with the requirements of Section 107(d)(1)(A) of the Clean Air Act.

Air quality measurement data was collected for the past three years in six areas of Alaska including Anchorage, Matanuska-Susitna Borough, Fairbanks (two locations), North Pole, and Juneau. The data shows only one community exceeding the health based annual exposure limit of 9.0 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) of air: North Pole.

Compliance with the health standard was determined by evaluating three years of ambient monitoring data in accordance with EPA's requirements under 40 CFR Part 50 Appendix N. Determination of attainment was established by comparing a three-year average of annual PM_{2.5} concentrations observed at each site to the level of the standard. Table 1 lists the annual design values for the six monitoring locations in comparison to the revised annual health standard:

Table 1. Design values for PM_{2.5} monitoring locations in Alaska compared to the standard.

PM _{2.5} Monitoring Sites	2023 Design Value ($\mu\text{g}/\text{m}^3$)
<i>Annual Standard</i>	9.0
Anchorage	5.1
Matanuska-Susitna Valley	5.2
Fairbanks (NCore)	7.3
Fairbanks (A-Street)	8.4
North Pole	9.9
Juneau	5.1

Based on this data, Table 2 provides Alaska's designation recommendations:

Table 2. *Alaska's PM_{2.5} attainment recommendations per community.*

Community	Designation Recommendations
Anchorage	Attainment
Matanuska-Susitna Valley	Attainment
Fairbanks	Attainment
North Pole	Nonattainment
Juneau	Attainment
All Other Areas of Alaska	Attainment/Unclassifiable

Air quality characteristics in the interior of Alaska are unique due to low temperatures and low solar influence which results in atmospheric stagnation causing elevated PM_{2.5} levels. With our extensive understanding and knowledge of Alaska's air quality, we are certain that locations outside of the localized North Pole area are in attainment. Additionally with the North Pole area already under a SIP for a 24-hour nonattainment designation, we believe they are working towards reducing the PM_{2.5} levels and could reach Attainment standards within a years' time.

Therefore, we recommend that the urban area of North Pole and its surrounding residential areas be delayed in their designation as a nonattainment area until February of 2027 as allowed under Section 107(d)(1)(B)(i), as was EPA's practice for prior designations. For example, in 2006 the area reached nonattainment levels under the 24-hour standard but was not designated until 2009. Enclosed is supporting information with analysis regarding these designation recommendations as well as our recommended boundary for a North Pole annual PM_{2.5} nonattainment area.

Please contact Jason Olds, Air Quality Division Director, at (907) 465-5109, if you or your staff have any questions about Alaska's recommendations for the fine particle PM_{2.5} annual air quality standard.

Sincerely,



Mike Dunleavy
Governor

cc: The Honorable Michael Dunleavy, Governor
Grier Hopkins, Mayor Fairbanks North Star Borough
Krishna Viswanathan, EPA Region 10 Air and Radiation Division Director
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