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April 6, 2017

Kalispel Tribe of Indians
Attn: Air Quality Comments
PO Box 39
Usk, WA 99180-0039

Re: Redesignation of Kalispel Indian Reservation to a Class 1 under the Clean Air Act's Prevention of Significant Deterioration Program

To Whom it May Concern,

I am pleased to be invited to provide comment on the literature provided: "Kalispell Indian Reservation Prevention of Significant Deterioration Program – Class 1 Redesignation Technical Report by Ridolfi Environmental, February 2017."

First of all, the benefits of clean air and management of major emission sources have touched and inarguably improved our lives since the Act was promulgated in 1977.

With respect to the Technical Report, I have three primary questions or concerns.

1. The area that is being considered for redesignation is not clearly spelled out. While I believe that the area being considered for redesignation is exclusively the area outlined in red on Figure 1of the Report, the inclusion of "off reservation land" and "adjudicated lands" on the figure reduce the clarity of this redesignation zone. Given the geographic and proximal requirements of dispersion modelling, the exact boundaries of the area proposed for redesignation should be stated and shown clearly.
2. In the Power Consulting Incorporated report "Economic Impact of Redesignation of the Kalispel Indian Reservation as a Class 1 Area under the Clean Air Act's Prevention of Significant Deterioration Program", dated February 3, 2017, Figure 3 and Figure 17 show concentric circles up to 50 km from the reservation redesignation area. It is understood that PSD increment analysis is mandatory for all potential large projects (emitting more than 100 tons per year of criteria pollutants) within 100 km of the Class 1 area and is discretionary for those between 100 km and 300 km. The economic analysis and other considerations in both this and the Ridolfi report should provide a more thorough analysis of the impacts of seasonal wind direction and explicitly include the area out 100 km, and possibly further, from the proposed redesignation area, The actual area of potential impact from the proposed redesignation would extend into population centers of north

Idaho (Coeur d'Alene, Post Falls), Lincoln County, Ferry County, and possibly further. . It should be noted that the Ridolfi Report shows the 100 km boundary on Figure 15.

3. While we are encouraged that the findings of the studies suggest that redesignation is unlikely to limit economic development, we request that the public comment period be extended for 60 additional days to allow more time for agencies and businesses to predict potential economic impact. For example, there might be private business entities preparing permitting packages that have not yet contacted permitting agencies. Similarly, there might be business entities within 100 km of the redesignation area that are planning to expand their facilities, and would need additional time to evaluate potential emission increment increases and the resulting technology cost to meet PSD rules.

I appreciate the opportunity to provide these comments, and hope this commentary is seen as constructive. Should you have any questions please feel free to contact me at 509-446-4516.

Sincerely,

Mark J Brown
General Manager
Pend Oreille Operations