

September 23, 2020

Dave Jones
ADEC
P.O. Box 111800
Juneau, AK 99811

Via email to dave.jones2@alaska.gov

Re: Proposed Air Quality Control Construction PSD Permit AQ1539CPT01 for Alaska Gasline Development Corporation's (AGDC) Liquefaction Plant

Dear Mr. Jones,

On behalf of National Parks Conservation Association (NPCA), I am writing to request an extension to the public comment period for the above captioned proposed Prevention of Significant Deterioration (PSD) Permit. The proposed PSD permit would allow AGDC to construct a facility in Nikiski, Alaska, that would process, store, and load liquified natural gas for shipment of Alaska's North Slope natural gas to outside markets.

NPCA is a nonprofit and nonpartisan organization working to protect and enhance America's National Park System for present and future generations. The National Parks Conservation Association was founded in 1919, and today has more than 1.3 million members and supporters. It is headquartered in Washington, D.C., and has various regional and field offices, including an Alaska Regional office in Anchorage. Among other things, it works to ensure that National Park and Preserve lands, and surrounding federal and state lands, are managed to protect their wilderness character. NPCA is concerned about adverse impacts to visibility and air quality related values from this proposed permit on National Park and Preserve resources in Alaska; and therefore, has a keen interest in minimizing criteria and hazardous air pollutants from this major stationary source, reviewing the permit's terms and conditions and supporting analyses to determine whether the proposal follows the Clean Air Act's PSD requirements. The proposed PSD permit and Technical Analysis Report (TAR) contain numerous important highly technical, legal, engineering, and modeling issues that involve review and input from NPCA's experts.



NPCA's concerns are further heightened in light of its history on the related proposed government action, where NPCA identified serious deficiencies and provided extensive comments on the Federal Energy Regulatory Commission Draft Environmental Impact Statement on the Alaska LNG Project, which included this facility.

Additionally, we note that ADEC received the Company's permit application more than two years ago, and thus spent considerable time developing the multifaceted proposed permit package. Providing additional time for meaningful public comment on this proposed PSD permit will help ADEC obtain more comprehensive information to help better inform ADEC's decisionmaking.

For the above reasons, on behalf of NPCA, I respectfully request a 30-day extension to the comment period – from Sunday, October 11, 2020 to Tuesday, November 10, 2020 - to allow NPCA and its experts the opportunity to review the proposed package and provide meaningful feedback. Please feel free to contact me if you have any questions or would like to discuss this request.

Sincerely,

A handwritten signature in blue ink that reads "Sara L. Laumann". The signature is fluid and cursive, with the first name "Sara" and last name "Laumann" clearly distinguishable.

Sara L. Laumann
Principal
Laumann Legal, LLC.
sara@laumannlegal.com
(303) 619-4373

cc: Stephanie Kodish, NPCA
Jim Adams, NPCA