

April 28, 2020

Sean Fitzsimmons Unit Leader: Ambient Air Monitoring Iowa Department of Natural Resources 502 E 9th St Des Moines, IA 50319

Dear Mr. Fitzsimmons:

Thank you very much for the opportunity to comment on the DNR's 5 Year Air Monitoring Network Assessment. The Iowa Association of Business and Industry (ABI) represents 1,500 members companies from all corners of the state. ABI members represent industries from insurance and banking to manufacturing and construction. With a diverse range of members, ABI has a vested interest in the policies that the Department and Bureau implement.

After receiving feedback from ABI members in regards to Iowa's 5 Year Network Monitoring Assessment, we would ask that the Air Quality Bureau continue to take into careful consideration the placement of monitors so that their proximity to emission sources leads to accurate and objective data for the state as a whole. If there is state interest in an emitter where monitoring data is necessary then do not factor it into overall state levels of emissions as it would likely unfairly weight the average.

Consistent with comments ABI submitted Re: Iowa's 2016 Air Monitoring Network plan, we encourage the Bureau to continue to evaluate the necessity of replacing monitors and potentially eliminate monitors should they be deemed redundant and unnecessary. We would suggest the Bureau potentially request proposals from private companies to see if the costs of monitoring can be reduced as a means of encouraging efficiencies. We would also comment that as all Iowans benefit from good air quality, funding for the air monitoring network should come from the State of Iowa general fund versus the business community at large.

ABI and our members appreciate the productive relationship that we have with the Department and the Air Quality Bureau. Thank you for the opportunity to comment.

Regards,

Brad Hurtkont

Brad Hartkopf