



League of Women Voters of Montezuma County
P.O. Box 1753
Cortez, Colorado 81321
June 2, 2011

New Mexico Environmental Improvement Board
1190 St. Francis Drive N2150
Santa Fe, New Mexico 87502

Reference: **Hearings in EIB 11-01 Proposed Revisions to the NM State Implementation Plan for Regional Haze and 11-02 Proposed revisions to State Implementation Plan** to Satisfy requirements of Clean Air Act 110(a)(2)(D)(i) (II) with respect to visibility.

Comments from League of Women Voters of Montezuma County, CO

Thank you for the opportunity for League of Women Voters of Montezuma County, Colorado to comment to the Environmental Improvement Board regarding the proposed revisions to the NM State Implementation Plan for Regional Haze and revisions to Satisfy requirements of the Clean Air Act. Montezuma County is one of the Four Corner counties and is the location of Mesa Verde National Park and the Ute Mountain Tribal Park. Prevailing winds carry pollutants from the San Juan Generating Station coal-fired power plant to our county.

We support the EPA proposal for the San Juan Generating Station to use BART to upgrade SJGS to improve the air quality and visibility and to improve the health of the extensive population now impacted by the haze and pollution produced by the power plant. The Board must not permit new compromises to the extensive air shed impacted by SJGS. A better demonstration of regional "good neighbor" policy and political strategy must include EPA's proposed revisions for the power plant.

This power plant interferes with visibility in some of southwestern Colorado's most treasured view-sheds and impacts the health and health care costs of thousands of residents within that air shed. We live at an elevation of 6000-7000 feet where the air is more rarified, where our lungs work harder than do those at a lower altitude and for that reason alone, we must insist on reduced toxic emissions from the San Juan Generating Plant.

The PNM wants the State of New Mexico Environment Department to agree that SNCR is BART for the San Juan Generating Station. It is not BART. We believe that the EPA has strongly asserted the need to implement more robust revisions than the NM Environmental Improvement Board is considering as suggested by PNM.

EPA's conclusion that its plan will result in an eighty percent reduction of NOx whereas the proposal by NM Power with the use of SCNR will result in only a twenty-three percent reduction of NOx. Not good neighborhood policy. Our County's government officials and residents are also concerned if EPA lowers its ozone standard and the County would be in non-containment.

National parks and monuments, wilderness areas and forests bring major economic benefit to the Four Corners region that relies on tourism and natural resources providing long-term economic growth and sustainability. With increased oil and gas development, over grazing, and prolonged drought combined with coal-fired power plant pollution, there has been continual deterioration of the region's air quality.

Until the EPA and public receive a professional and credible cost accounting by SJGS including additional pollution control investments for haze pollution and health care costs, this Board should not make a final decision on whether to accept the new revisions now under consideration.

Please incorporate all comments herein contained into your final rule.

Thank you again for the opportunity to comment on the new revision proposal that will affect the health of our citizens and economy significantly of our region.

Sincerely,

A handwritten signature in cursive script that reads "Jodi Foran".

Jodi Foran, Co-President, League of Women Voters of Montezuma County, CO
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LWVCO Director www.lwvcolorado.org