



League of Women Voters of Montezuma County
P.O. Box 1753
Cortez, Colorado 81321
February 14, 2011

Mr. Guy Donaldson, Chief
Air Planning Section (6PD-L)
Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Subject: Comments for EPA Docket No. EPA-R06-OAR-2010-0846

Dear Mr. Donaldson

Thank you for the opportunity to comment on the Environmental Protection Agency's proposed Federal Implementation Plan for Interstate Transport of Pollution Affecting Visibility and Best Available Retrofit Technology regarding the San Juan Generating Station (SJGS). We are pleased that the Environmental Protection Agency Region VI Dallas is actively evaluating the SJGS and developing a strategy under which 1.) The Plant will no longer release air pollution that allows interstate interference with visibility and our treasured views in southwestern Colorado, and 2.) The Plant will significantly reduce emissions of nitrogen oxides. The EPA is to be congratulated for preparing an extremely professional and thorough case supporting its proposals. We support the proposed EPA rule.

As members of the League of Women Voters of Montezuma County, we and many of our friends and neighbors have lived in the Cortez area for a long time, some up to 30-40 years. During those many years, the operators of the San Juan Generating Station have had a largely unrestricted use of the large (7,550 sq. miles) common air-shed that Montezuma County, Colorado and San Juan County, New Mexico share. We and our neighbors have been exposed 24/7 to the pollution emitted by the 1800 megawatt SJGS into that common air-shed for many decades. This is an environmental health burden to us. There is no penalty, no cost, no fine assigned to the operators of the SJGS for this intrusion on our air-shed. Furthermore, there is practically no benefit to us from the SJGS as residents in this beautiful corner of the State. Except for the two percent (40 MW) of electricity purchased by Tri-State from SJGS, we receive no electricity from SJGS, no tax revenues, and no community support. We only eat their exported smoke, soot, and pollution, as we try to balance the significant air quality burden imposed upon us with essentially no economic benefits received.

Our specific comments are attached, and are organized by Section of the EPA proposed rule, as published in the Federal Register on Wednesday, January 5, 2011. We have also provided our comments electronically at the EPA Region VI "Contact Us" website on February 14, 2011.

Again, we appreciate the opportunity to comment. Please do not hesitate to contact us if there are questions on our comments.

Sincerely,

Eleanor Kuhl, President
League of Women Voters of Montezuma County
president@lwvmontezuma.org