

Public Comments for the  
Colorado Air Quality Control Commission Meeting  
June 15, 2011

The League of Women Voters of the United States has advocated for full implementation of the Clean Air Act and strengthening air pollution controls since the early 1970s. At the local level, the League of Women Voters of La Plata County has recently urged the most stringent of Best Available Retrofit Technologies ("BART") be installed at coal-fired power plants in the Four Corners region, proposed a local EPA office to coordinate air quality issues, and co-sponsored a forum to educate the public on air quality issues in Southwest Colorado.

Although we do not have any major metropolitan areas in Southwest Colorado, we do have a combination of industry, agricultural practices, and climatic factors that work together to create a "perfect storm" that degrades our air quality. Prevailing winds in the Four Corners do not blow in a straight line from the southwest. The State of Colorado Technical Support Document for Recommended 8-Hour Ozone Designations dated February 12, 2009 says that "back-trajectory analyses show significant residence times for air parcels over ozone precursor source areas within New Mexico" for lands in Archuleta, La Plata and Montezuma counties in Colorado.

Tomorrow you will discuss ozone issues facing Southwest Colorado, including the possibility of the area becoming non-attainment for ozone. Many of the precursors to ozone in our region, such as nitrogen oxide and the VOC methane, come from coal-fired power plants and gas wells not located in our county, let alone our State. The San Juan Basin has 35,000 oil and gas wells, 10% of which are located in our county and a majority of the remaining are located in Northwest New Mexico. I have attached a graphic depicting active oil and gas well locations in Northwest New Mexico and Southwest Colorado in the information provided to the Commission. Two of the dirtiest coal-fired power plants in the country -- Four Corners Power Plant and San Juan Generating Station -- are located in Northwest New Mexico as well. We breathe the pollutants from these sources, but Colorado has no jurisdictional authority over them.

The Four Corners region in which we are located covers three EPA regions, four states, and multiple sovereign tribes. We need your help in ensuring that other counties and states cannot unilaterally make decisions without considering the impacts upon their neighbors, such as the recent decision by the New Mexico Environmental Improvement Board to reduce BART for the San Juan Generating Station in their State Implementation Plan.

The Four Corners has seen prolonged drought and over-grazing on range lands, including public lands. Spring dust storms turn our skies a threatening orange and create respiratory problems for the young and old. The particulate matter also creates haze which has economic impacts. We rely upon tourism and the natural resources of our national parks and monuments, wilderness areas and forests. Drought and over-grazing combined with increased oil and gas development and coal-fired power plant pollution has created a continual deterioration of our air quality. Particulate matter from dirt roads accessing oil and gas wells also contribute to the haze which can shroud the Four Corners.

Another not uncommon summer contributor to degraded air quality in Southwest Colorado is smoke and haze from wildfires. Last Tuesday (June 7, 2011) the Durango Herald headline was "Smoke prompts health advisory." Winds were sending smoke from Wallow Fire in the mountains of Eastern Arizona over 300 miles to blanket Durango. On its trajectory to Southwest Colorado, it picked up nitrogen oxide and methane in Northwest New Mexico to add ozone to create a potentially deadly mixture. We have no real-time instruments that help our local health department facilitate advisories and the notice we received last Tuesday came after most of the smoke had cleared.

The League of Women Voters of La Plata County urges the Colorado Air Quality Control Commission to consider regulations to address the unique circumstances impacting air quality in Southwest Colorado in order to preserve the physical, chemical and biological integrity of our ecosystems and to protect public health.

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