

Comments for the Public Hearing for SJGS Proposed Revisions to the SIP for Regional Haze and the Clean Air Act

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The League of Women Voters of La Plata County in Colorado urges the Environmental Improvement Board to reject the New Mexico Environment Department's revisions to the Regional Haze Rule in the New Mexico State Implementation Plan and to support the EPA's plan requiring the SJGS to install SCR or similar technology to reduce the plant's nitrogen oxide emissions by 83%. Installation of SCR technology at the SJGS would improve the health and economic opportunities, provide cleaner air, and address environmental justice for people in the Four Corners, many of whom are low income and live below the poverty level.

La Plata County borders San Juan County, New Mexico in which the SJGS is located. Prevailing winds carry pollutants from the coal-fired power plant to our county in southwest Colorado as well as all counties of the Four Corners region and four sovereign tribes. The proposed revisions to New Mexico's good neighbor provisions of the State Implementation Plan of the Clean Air Act would reduce haze significantly less than the EPA proposal. The SCR technology proposed by the EPA would have almost a four-fold NO_x control effectiveness over the SNCR technology proposed in the revised SIP.

Nitrogen oxide, a major cause of haze, is also a precursor to ground-level ozone which is regulated by the EPA. Should the EPA lower their ozone standard this summer, La Plata County could be in non-attainment. The SJGS is one of the major sources of nitrogen oxide in the area's air shed. Our EPA region, state, nor county has any regulatory authority over the pollutants that are in our air from New Mexico including the power plant and we could potentially have difficulty coming into attainment because of pollutant sources not in our jurisdiction.

A decision factor used for the proposed revisions was economic information provided by PNM of New Mexico. They estimated a rate increase of \$82.00 per year per residential ratepayer from the installation of SCR technology. A recent study on the health impacts from the San Juan Generating Station estimated that in 2010, 33 deaths, 50 heart attacks, 600 asthma attacks, and 23 hospital admissions resulted from pollution from the power plant. The resulting health care costs were estimated at \$255 million for that year. This figure breaks down to over \$600 per person cost per capita in the 10 counties of the Four Corners -- which is significantly larger than the estimated rate increase and is incurred by residents that receive little or no benefit from the electricity produced at SJGS.

National parks and monuments, wilderness areas and forests bring tremendous economic benefit to the Four Corners region. We rely on the tourism and natural resources they provide for long-term economic growth and sustainability. With increased oil and gas development, over grazing, and prolonged drought combined with coal-fired power plant pollution, we have seen a continual deterioration of our air quality.

The LWV LPC urges the New Mexico Environmental Improvement Board as a good neighbor to require the most stringent of technologies to be installed at the San Juan Generating Station. We also urge you to promote cleaner forms of energy in New Mexico that encourage environmental justice and overall health of the region.