



League of Women Voters of La Plata County

June 2, 2011

State of New Mexico
Environmental Improvement Board
Harold Runnels Building, Room N-2150
1190 St. Francis Drive
P.O. Box 5469
Santa Fe, New Mexico 87502

Re: Proposed Revisions to the State Implementation Plan for Regional Haze and Proposed Revisions to the State Implementation Plan to Satisfy Requirements of the Clean Air Act with Respect to Visibility

Dear Mses. Ryan and Peacock, and Messrs. Casciano, Volkerding, Morrow, Bryce, and Fulfer,

The League of Women Voters of La Plata County, Colorado (LWVLPC) urges the Environmental Improvement Board to reject the New Mexico Environmental Department's revisions to the Regional Haze Rule and to support the Environmental Protection Agency's (EPA) plan requiring the San Juan Generating Station (SJGS) to install selective catalytic reduction (SCR) or similar technology to reduce the plant's nitrogen oxide emissions by 83 percent. The EPA proposal would reduce haze in the Four Corners national parks and wilderness areas as required by the Clean Air Act's 1999 regional haze rule that covers air pollutants over a wide geographic area. The proposal would also work towards improving the health, economic opportunities, and environmental justice for people in the Four Corners.

La Plata County, Colorado borders San Juan County, New Mexico in which the San Juan Generating Station 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 New Mexico Environment Department (NMED) is proposing that the Best Available Retrofit Technology (BART) at the San Juan Generating Station for Units 1-4 for nitrogen oxide (NOx) is selective non catalytic reduction (SNCR) technology. That technology would provide .23 lb/MMBtu emission performance level versus .07 lb/MMBtu using the selective catalytic reduction (SCR) technology proposal from the EPA. In other words, SCR technology would have almost four-fold NOx control effectiveness over SNCR technology.

Nitrogen oxide is 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 San Juan Generating Station is one of the major sources of nitrogen oxide in the area's airshed. 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 that NMED used in its' proposed revisions was economic information provided by the Public Service Company of New Mexico (PNM) that the cost of control technology beyond SNCR would be financially burdensome and cause economic hardship to low-income New Mexicans. They estimate a rate increase of \$82.00 per year per residential ratepayer from the installation of SCR technology versus an estimated rate increase of \$11.50 per year per residential ratepayer from the installation of SNCR technology.

Health care costs resulting from coal-fired power plant pollution is significant for the local economies. Abt Associates developed estimates of health impacts from the San Juan Generating Station using a well-established and extensively peer-reviewed methodology. The results for 2010 estimated that 33 deaths, 50 heart attacks, 600 asthma attacks, and 23 hospital admissions resulted from pollution for 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, including New Mexico, based upon 2000 census numbers. This cost for the Four Corners residents, many who are low income and below the poverty line, is significantly larger than the estimated rate increases and they receive little or no benefit from the electricity produced at the San Juan Generating Station.

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 LWVLPC 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.

Sincerely,

Trish Pegram, President
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