



October 25, 2009

To various and appropriate Regional EPA officials:

The Four Corners Power Plant and Navajo Generating Station are two of the largest pollution sources in the United States. The Four Corners Power Plant ranked number 1 in the US in 2006 for nitrogen oxide (NOx) emissions from a coal-fired power plant in tons per year (tpy); the Navajo Generating Station ranked number 4 in the US in 2006 for NOx emissions from a coal-fired power plant in tpy. (Source: http://www.dirtykilowatts.org/Dirty_Kilowatts2007.pdf).

Air pollution from the Four Corners Power Plant and the Navajo Generating Station impacts many of pristine and precious natural areas. Independently and together, these two power plants are two of the oldest, dirtiest power plants in our region that provide electricity at costs that don't account for air pollution, human public health impacts, and lost revenue from decreased tourism opportunities from adverse air quality conditions.

Visibility improvements at the surrounding national park and wilderness areas must improve. The economic cost effectiveness of applying BART at the two power plants must now include the health care costs of poor air quality. Four Corners Power Plant is located within 300 kilometers (km) of 16 mandatory Class I Federal Areas including National Parks (including Mesa Verde, Arches, Canyonlands, Grand Canyon) and wilderness areas (including Weminuche and Maroon Bells-Snowmass); Navajo Generating Station is located within 300 km of 11 mandatory Class I Federal Areas including National Parks (including Bryce, Arches, Canyonlands, Zion, Grand Canyon).

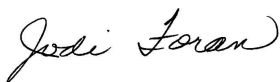
The League of Women Voters of Montezuma County:

1. Request that EPA require Four Corners Power Plant and Navajo Generating Station to implement the most stringent air pollution control measures to reduce emissions and improve visibility at Class I Federal Areas in the region.
 - Selective Catalytic Reduction (SCR) should be the EPA's chosen option as Best Available Retrofit Technology for Four Corners Power Plant and Navajo Generating Station.
 - The cost of complying with the most stringent pollution control measures should recognize Four Corners Power Plant and Navajo Generating Station's historic

electricity generation costs that have failed to account for pollution, adverse human health impacts, and visibility impairment.

2. Request EPA to improve visibility at the Class I Federal Areas to the greatest extent possible.
 - Class I Federal Areas represent vital air sheds to the region that impact economic, environmental and public health factors and need to be cleaned up.
3. Ask that EPA assert maximum responsibility to oversee the Tribal Authority Rule for promulgating oversight of these two facilities on the Navajo Nation.
4. Recognition that Four Corners Power Plant and Navajo Generating Station are the two biggest sources of NOx on the Colorado Plateau and should not be allowed to be permitted polluters and impair visibility throughout the region.
5. Request EPA to consider the economic costs on impacted communities and Class I Federal Areas associated with not cleaning up Four Corners Power Plant and Navajo Generating Station.
6. Request that EPA needs consider a shorter time frame than 20 years in assessing the two plants' Remaining Useful Life of Facility.
 - Both Four Corners Power Plant and Navajo Generating Station are over 40 years old and represent facilities that should have been decommissioned under the Clean Air Act.
 - Both are antiquated facilities that represent vast pollution sources to the region.
7. Ask the EPA to prioritize their responsibilities under Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations and Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks.

Sincerely,



Jodi Foran
President, League of Women Voters of Montezuma County
president@lwvmontezuma.org
jodi@foran.net
32323 Road M
Mancos, CO 81328
970-882-2401