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CITY OF
MOAB
UTAH

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May 27, 2022

Bryce Bird
Director
Utah Division of Air Quality
PO Box 144820
Salt Lake City, Utah 84114

Re: City of Moab Comments on the Regional Haze SIP

Dear Director Bird:

The City of Moab requests the Regional Haze SIP require the Hunter and Huntington coal power plants to comply with emissions reductions consistent with the best-available retrofit technology determined by the 2016 Federal Implementation Plan as per the Clean Air Act's Regional Haze Program Round 1 requirements. This plan would cut haze-causing nitrogen-oxide emissions by 76 percent from Utah's two major coal plants, and would clean up the air for our community, our visitors, and our national parks.

Moab is the gateway community to Arches and Canyonlands National Parks, in addition to miles of world-renowned trails providing recreation opportunities for over three million national and international visitors per year. We have unparalleled desert vistas which are a national treasure. The eye can only see as far as the air is clear, however, and haze from air pollution has detrimental effects on not only the views, but our community's health and safety as well. There is an opportunity already in place to prevent most of this air pollution and the Utah Division of Air Quality only needs to support it. The 2016 Federal Implementation Plan lays out a cost-effective route to decrease pollution from the two large coal plants in our region.

The City of Moab supports the enforcement of the Clean Air Act's provisions and the installation of nitrogen oxide pollution controls on the Hunter and Huntington coal plants to protect our clean air. It is unacceptable that two of the largest sources of haze pollution in the country remain uncontrolled, and it is unlikely that such a plan will be accepted by the EPA. Federal land managers at the National Park Service and the EPA have provided draft comments to the Utah Division of Air Quality on the draft plan and indicated it has serious flaws. Both agencies requested that real emissions cuts be made at Hunter and Huntington. The Regional Haze program is designed to return our national parks to natural visibility by 2064. If coal-powered air pollution is allowed to continue unabated, this goal will never be met. Pacificorp's 2021 Integrated Resource Plan states they plan to keep the Huntington plant open until 2036, and it would allow the Hunter to continue burning until 2042. This is 14 and 20 years, respectively, of haze-causing air pollution that could be avoided with the implementation of the 2016 FIP requirements.

The City appreciates the opportunity to comment on the Regional Haze SIP. Please do not hesitate to contact us if you have any questions about the comments provided.

Sincerely,

Joette Langianese

Mayor
City of Moab