

To: KC Becker, Region 8 Administrator, EPA
From: City of Moab
Subject: Clean Air Act Regional Haze Program
Date: February 8, 2022

The City of Moab requests the EPA 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% from Utah's two major coal plants, and would support the Biden administration's stated interests in climate change action and clean energy development, and in addition to cleaning 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 a majority of this air pollution, the EPA 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, and over 106,600 people have already submitted comments in support of pollution controls as per this plan.

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. 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 that they plan to keep the Huntington plant open until 2036 and the Hunter plant 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.

Our city was proud to host Region 8 Administrator Sean McGrath in 2015, as the EPA deliberated the initial Utah round 1 FIP designation. We would like to invite the current Region 8 Administrator, KC Becker, to visit and listen to the concerns of our community, as this issue deserves careful consideration.

Our City's economic and public health depend on clean air and clear skies. The EPA has the opportunity to keep them that way.

Sincerely,

Joette Langianese, Mayor