

1 July2021
114 Legacy Lane
Alto, NM 88312

Permit Programs Manager
New Mexico Environmental Department
Air Quality Bureau
525 Camino De Los Marquez
Santa Fe, NM 87505-1816

Hello:

Now that Roper Construction, Inc., P.O. Box 969, Alto, NM has filed an air quality permit application, I have some issues with the application content. Here are my objections/concerns:

1. The application acknowledges that the proposed location is within 1.25 miles of a National Class I Wilderness area (White Mountain Wilderness). This may well violate national or state setback requirements for industrial operations. In any event, it is too close to avoid impacting fragile wildlife and flora, an effect amplified by the ongoing unprecedented drought.
2. The application states that there are no "sensitive areas" near the facility. This ignores two major concerns. First, the Mountain View Christian Camp is located within a half mile (east) of the proposed plant. Children are there throughout the summer and possibly other times of the year for shorter periods. Second, there are MANY retired individuals in the surrounding neighborhoods - Enchanted Forest (to the north), Ranches of Sonterro (northeast), Legacy Estates (south), Alto Lakes/Outlaw (south and east). The risks to these individuals, particularly those with breathing issues cannot be simply ignored. In fact, many of the part-time residents are older.
3. The application doesn't seem to allow for specifying that the proposed location is on an officially designated Scenic Byway (Billy the Kid Highway - Route 220). A concrete plant in no way fits with the nature of this area past nor present, and is totally inappropriate for a scenic byway.
4. The application addresses the process of crushing stone (primary crusher) as part of the production of concrete. The list of equipment does not appear to include a crusher. Clarification is needed to specify whether a crusher will be on premises and whether this has been included in the particulate emissions. It would be a major contributor to noise as well.
5. Nowhere on the application does it seem to ask about the topography and the resulting impact on noise created by the plant. The proposed location is in a "bowl" with mountains/high hills all around. This creates an echo effect that amplifies the sound produced anywhere in that bowl. This applies to not only the plant noise, but that of the truck traffic into and out of the plant at times that will occur very early in the morning (as per the application). This will be a MAJOR problem for the surrounding homeowners

and businesses.

I am pleased to learn that the Air Quality Department is planning to hold a public hearing regarding this matter. This is needed. It appears that there is a very large opposition to this plant and it continues to grow. The threats to the environment – air, water, wildlife, etc. - are too great to simply treat this as an emissions problem for a plant located in a sparsely populated, low water demand area. It is simply the WRONG location for this type of business.

Respectfully,

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