

12 August 2021
114 Legacy Lane
Alto, NM 88312

Permit Programs Manager
New Mexico Environmental Department
Air Quality Bureau
Permits Section
525 Camino De Los Marquez Suite 1
Santa Fe, NM 87505-1816

Hello:

Now that the Roper Construction, Inc., P.O. Box 969, Alto, NM air quality permit application has been reviewed for completion, I have some issues with the initial determination that the plant will likely comply with air standards. Here are my objections/concerns:

1. The proposed location is within 1.25 miles of a National Class I Wilderness area (White Mountain Wilderness). This is much too close to avoid impacting fragile wildlife and flora, an effect amplified by the ongoing unprecedented drought. This area of the wilderness is also trying to recover from a devastating wild fire that occurred in June 2012. Such a plant should be at least 3 miles away.
2. The location for this plant is incompatible with the "sensitive areas" nearby. 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 as well. Levels of air pollutants that might be acceptable for a more general population are NOT suitable for an older and more vulnerable population that is basically collocated with the proposed plant. This is in stark contrast to the concrete plant location Roper owns and operates in nearby Carrizozo, NM (30 miles away).
3. The topography of the area around the plant location is not compatible with proper dispersal of the pollutants, especially when there is little to no wind. This is very common in the summer and fall, which are the peak times for planned production. The proposed location is in a "bowl" with mountains/high hills all around. Without clearing wind, this will cause the pollutants in the air to simply concentrate in this bowl, expanding outward. And, the resulting impact on people living nearby will be magnified.

I hope the Air Quality Department will seriously consider these factors in deciding whether to approve this application. I believe a public hearing is needed to address the many concerns of the public regarding this matter. The proposed hours of operation are excessive, and would mean pollutants will be released during the calmest times of the day – early morning and

early evening. This is simply NOT the proper location for such a plant.

Respectfully,

William F. Horton Jr.

Penelope S. Horton

William F. Horton, Jr. (575) 336-8382

Penelope S. Horton

wbillhorton@yahoo.com