

7 February 2022  
114 Legacy Lane  
Alto, NM 88312

New Mexico Environmental Department  
Air Quality Bureau  
Madai Corral, Hearing Clerk

Hello:

Today we are providing our comments regarding the application by Roper Construction for a permit to operate a concrete batch plant (CBP) near the intersection of Highways 48 and 220 in Alto, NM. These relate to the public hearing scheduled for 9-11 February 2022.

The proposed location of the CBP is about 660 feet from our home, which is directly across Highway 220 from the site. We are essentially at a "ground zero" location. My wife, Penelope, was diagnosed with Reactive Airway Disease prior to us moving to our home in August 2007. Within 2 years living here, her breathing issues basically disappeared due to the clean air the area has afforded. The inevitable fugitive dust from a CBP will be very detrimental to her health, almost certainly making our home unlivable for us. Any chance of selling the home will be virtually nil. NO ONE will want to live so close to the pollution, noise, and heavy traffic that the CBP will cause. The resulting health, emotional, and financial stress will be severe.

The inappropriateness of the proposed location is not merely an issue for us. It is situated in the midst of a largely residential area with a high concentration of retirees. The emissions from the CBP will pose a greater than typical health hazard to the populace due to advanced age and attendant health issues related to cardio/pulmonary function. Additionally, a year-round church camp is located about .4 mile from the proposed site. Their numbers peak during the summer, which coincides with the proposed peak hours of operation for the CBP.

The CBP site 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, including threatened and endangered species - an effect amplified by our ongoing unprecedented drought. This area of the wilderness is also trying to recover from a devastating wild fire that occurred in June 2012.

NMED should be concerned about ground water contamination resulting from the CBP operation. Water sources such as Little Creek are as close as 1/3rd mile away. Little Creek and the Rio Bonito, located to the north of the CBP proposed location, seems to be the major source of water for the Fort Stanton/Snowy River cave system. Both sources stand to be imperiled by contamination and runoff from the CBP.

It is unknown at present exactly how close the CBP location will be to the Fort Stanton/Snowy River cave system. Thus, it is unknown what impact the plant will have on the already severely distressed bat population as they fly through the dust plume and return to the cave. It is also unknown the impact water discharge and runoff from the plant will have on the

cave system itself. There is speculation that the cave system runs all the way out to the Legacy Estates where we live. Can we risk irreparable damage to this important natural treasure without knowing the consequences?

It is discouraging and most egregious that only the particle emissions from the CBP seem to matter to the New Mexico Environmental Department (NMED) when considering the impact of a CBP on the local environment. The water that will be required to attempt mitigation of particle emissions on top of that required to produce 125 cubic yards of concrete per hour simply cannot be supported by available ground water. The entire Hondo Basin is presently undergoing severe drought related stress to the point of wells in the area experiencing no to reduced flows and must be drilled deeper or replaced.

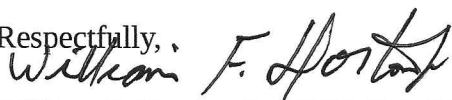
More specifically, it is highly doubtful that spraying material on the ground at the plant will mitigate fugitive emissions. I witnessed first hand the dust mitigation efforts on the dirt road leading to the Bonito Lake reservoir over the past many months. While traveling the road to the area where reclamation work was being done to the lake, I saw trucks watering the road for dust control. I also saw dump trucks coming toward me behind the water truck. On clear, dry, and breezy to windy days, it was only a few minutes before the oncoming trucks were raising enough dust to make visibility risky. Is Mr. Roper prepared to apply water to his materials and road ways continuously during such periods? Such conditions are common events during our extended spring season (late February into early June). This is also typically our critical period of fire danger, placing additional stress on available water.

Much attention during the approval process and the expected testimony at the public hearing will focus on modeling the CBP air emissions. One of the factors that has not been considered is the topography of the land around the plant location. It is essentially a large bowl surrounded on all sides by high mountains/hills. The bowl is roughly 2-3 miles north to south, and 5 miles east-west. When the wind isn't blowing (most common in the summer and early fall), the fugitive dust will simply billow out to fill this bowl, then begin to spill over the edges of the bowl. This will produce concentrated levels of visible and breathable dust that will persist until clearing winds return. During such periods, the risk our older population will be untenable.

The topography also will exacerbate another pollution that results from CBP operations – noise. The proposed hours of operation included starting at 3 AM and operating until 9 PM. The effect of the “bowl” on the noise associated with plant operation and the truck traffic that will result is to magnify the sound as it bounces off the surrounding mountains/hills. This will negatively impact neighbors within a mile or two, and especially at night when such noise will be even more disruptive due to the absence of background noise.

I hope the Air Quality Department will seriously consider these factors in deciding whether to approve this application. This is simply NOT the proper location for such a plant.

Respectfully,



William F. Horton, Jr. (575) 336-8382 (wbillhorton@yahoo.com)

Penelope S. Horton

