

6 October 2022  
114 Legacy Lane  
Alto, NM 88312

Environmental Improvement Board (EIB)  
1190 St. Francis Dr. Suite N4050  
Santa Fe, NM 87505

Re., Petition For Hearing On Air Quality Permit NO. 9295, Roper Construction

Hello:

We are writing to strongly oppose granting an air quality permit allowing Roper Construction to build and operate a concrete batch plant (CBP) on Highway 220 in Alto, NM. We fully support the rationale of the prior denial of this permit by the Office of the Secretary, New Mexico Environmental Department (NMED). Here are our specific objections/concerns regarding this location for a CBP:

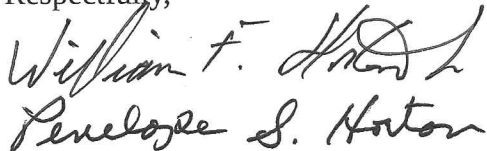
1. Prior to moving to the above location in Alto, NM, my wife was diagnosed with reactive airway disease and was prescribed an emergency inhaler.. Our current location is less than 660 feet from the proposed CBP location. Shortly after moving here to a pristine environment, her symptoms have disappeared and the inhaler is no longer required. If this plant is allowed to operate, her symptoms will most certainly recur, necessitating a relocation away from this area.
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 year. 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). As noted in the prior hearing summary and decision, there are 11 communities in close proximity to the proposed plant location.
3. 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 much further away.
4. 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. The temperature inversions that are common in the winter will also exacerbate the impact of pollutants. And, the resulting impact on people living nearby will be magnified.

5. The modeling for the emissions for the proposed plant appears hopelessly flawed. Not only did Mr. Roper's consultant use meteorological data from Holloman AFB, some 60 miles away and 3,000+feet lower in elevation, in lieu of Sierra Blanca Airport, some 8 miles away, but the proposed site configuration has changed many times since the application was filed. Since the owner has no water rights for industrial use, all water must be hauled and stored on the premises— that for producing the concrete and for suppressing pollutants. This storage was NOT included in the site configuration proposed. This leads into the problems noted in the original hearing officer's report regarding haul road emissions. The wrong data was used in the emissions modeling. In fact, it is unclear whether the proposed CBP would actually qualify as a "minor source" for pollutants.
6. We formally requested copies of prior inspections by NMED of Mr. Roper's CBP in Carrizozo, NM during the period of its operation, some 6+ years. We were informed that NO inspections were performed. This is unacceptable for an area as sensitive as that proposed for the new CBP. NMED CANNOT simply approve these plants and operate on a "trust me" basis when people's health is at stake.

NMED got it right the first time. We urge the EIB to uphold the denial of this permit. This is simply NOT the proper location for such a plant – the risks are much too high.

Respectfully,



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

wbillhorton@yahoo.com