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Forest Service
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File Code: 2580
Date: DEC 16 2010

Mr. Neal Butt
Air Quality Division—City of Albuquerque
P.O. Box 1293
One Civic Plaza
Albuquerque, NM 87103

Dear Mr. Butt:

On October 22 the City of Albuquerque-Bernalillo County submitted a draft regional haze State Implementation Plan (SIP). We greatly appreciate the opportunity to work with the Albuquerque-Bernalillo County Air Quality Control Board (AQCB) and to provide comments in our review of the plan. Cooperative efforts such as these ensure that, together, we will continue to make progress toward the Clean Air Act's goal of natural visibility conditions at our Class I Wilderness Areas.

Even though AQCB submitted a Section 309 SIP, the regional haze regulations of 40 CFR 51.308(i) require consultation between FLMs and the State. Specifically:

> *The state must provide the Federal land Manager with an opportunity for consultation, in person and at least 60 days prior to holding any public hearing on an implementation plan (or plan revision) for regional haze required by this subpart. This consultation must include the opportunity for the affected Federal Land Manager to discuss their:*
>
> *(i) assessment of impairment of visibility in any mandatory Class I Federal area; and*
>
> *(ii) recommendations on the development of the reasonable progress goal and on the development and implementation of strategies to address visibility impairment.*

In the past, communication with the USFS from AQCB regarding regional haze SIPs has been adequate; however, we have no record of the Albuquerque-Bernalillo County Board contacting us about this SIP revision. We ask to be provided with the mandatory 60 day comment period for all SIP revisions.

Please find our enclosed comments. Much of our concern stems from the "Reasonable Progress for Additional Class I Areas" portion of the SIP. The USFS finds this section addressing the requirements of 309(g) to be incomplete. The AQCB fails to quantitatively assess the impact of Bernalillo County emissions on Class I Areas, especially given the large projected increases in area SO_2 and NO_x sources. As such, the USFS believes a redraft is necessary to adequately meet the requirements of the Regional Haze Rule.

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Again, we appreciate the opportunity to work with the AQCB and compliment you on your hard work and dedication toward improving visibility conditions in our National Forests and Wilderness Areas. We look forward to your response. Any questions can be directed to our air quality specialist, Susanna Ehlers, at (505) 842-3840.

Sincerely,

C. L. Newman Jr

CORBIN L. NEWMAN, JR.
Regional Forester

Enclosure

cc: pdl r3 nm mailrooms, Susanna M Ehlers

U.S. Forest Service Specific Comments: Albuquerque-Bernalillo County RH SIP

Appendices

References to appendices are made throughout the document. However, no appendices were made available to the USFS. Therefore, we were unable to do a complete and thorough review of this SIP. Our comments do not include consideration of the Appendices.

Treatment of Clean Air Corridors

The *WRAP Policy Paper on Clean Air Corridors* is from November 2002. More recent data, if available, would give weight to the finding of no significant emissions growth. This finding is concerning as it likely overlooks the emissions growth brought about by the expansion of oil and gas development in recent years.

Reasonable Progress for Additional Class I Areas

The USFS provided comment to Albuquerque-Bernalillo County Air Quality Control Board (AQCB) in October 2007. A major focus of those comments centered upon the need to comply with the requirements of 40 CFR 51.309(g) which require AQCB to address additional Class I areas not on the Colorado Plateau. We appreciate AQCB's effort to address the requirements of 309(g). However, we believe the analysis is substantially incomplete and does not meet the intentions of 40 CFR 51.309(g)(1) and (g)(2).

Under (g)(2) of 40 CFR 51.309, the implementation plan must comply with requirements 308(d)(1) through (4). The Albuquerque-Bernalillo County implementation plan does not examine the effects of its emission control strategy in relationship to non-Colorado plateau Class I areas.

In reviewing information provided in New Mexico's previous draft 308 implementation plan pertaining to the establishment of reasonable progress goals pursuant to 40 CFR 51.308(d)(1), we noted that the plan goals did not meet the uniform rate of progress (URP) in improving visibility on the 20% worst days and also allowed for degradation in the most impaired days at Gila Wilderness, and degradation in the least impaired days at Gila Wilderness and Carlsbad Caverns National Park. The supporting modeling information also showed incremental increases in anthropogenic emissions impacting New Mexico Class I Areas (Bandelier National Monument and Carlsbad Caverns National Park). From our review of the NM 308 SIP, we noted the following:

1. Section 11.3.1 – Bandelier National Monument: PSAT results for SO_4 and NO_3 (Figure 9-10 and 9-12) show a significant increase in the NM area category.
2. Section 11.3.2 – Bosque del Apache Wildlife Refuge: PSAT results for SO_4 and NO_3 (Figure 9-14 and 9-16) also show a significant increase in the NM area category over the baseline period.
3. Section 11.3.3 – Carlsbad Caverns National Park: PSAT results for NO_3 (Figure 9-20) show an incremental increase in the NM area category over the baseline period.

4. Section 11.3.4 – Gila Wilderness: The documentation does not support the conjecture that OC from wildfire would account for a 45% increase in 2018 in the extinction budget over baseline conditions.
5. Section 11.3.5 – Wheeler Peak/Pecos Wilderness Areas: PSAT results for NO_3 show a significant increase in NO3 impacts from NM area sources (Figure 9-28).

Our evaluation of available WRAP information suggests Bernalillo County may in fact play a significant role in the 2018 modeling projections for a number of NM Class I areas. In Figure 1 (attached), Bernalillo County area source SO_2 emissions are projected to increase by nearly 10,000 tons per year. As indicated in Figure 2, Bernalillo County area source NO_x emissions are projected to increase nearly 6,500 tons per year and point source NO_x emissions by several hundred tons per year. For both SO_2 and NO_x, Bernalillo County accounts for the vast majority of statewide increases of these pollutants.

Likewise, the Albuquerque-Bernalillo County implementation plan does address the requirements of 40 CFR 51.308(d)(3) in which the plan must demonstrate that it has included all measures necessary to get its share of the emissions reductions needed to meet the progress goal for Class I areas outside of the county. Under 40 CFR 51.309(g)(2)(i), the state may build upon strategies implemented pursuant 309(d). AQCB has made no attempt to analyze the relationship of SO_2 emission reductions projected to be realized from implementation of the SO_2 strategy to non-Colorado Plateau Class I areas.

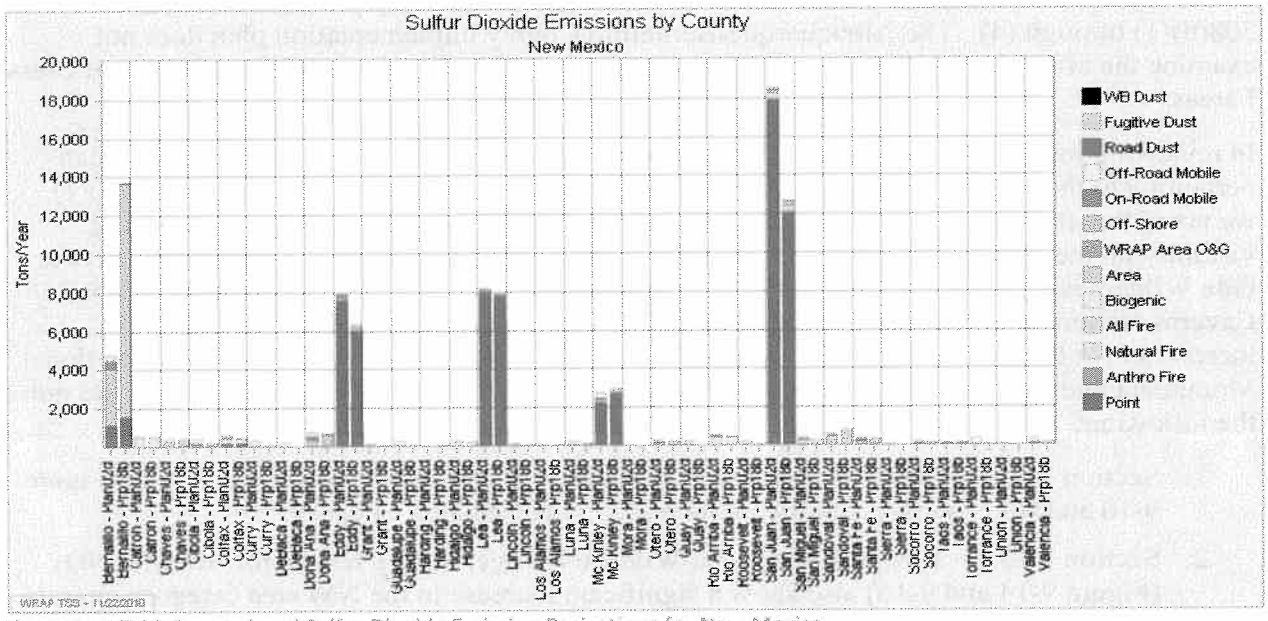

Figure 1 - WRAP County Level Sulfur Dioxide Emission Projections for New Mexico

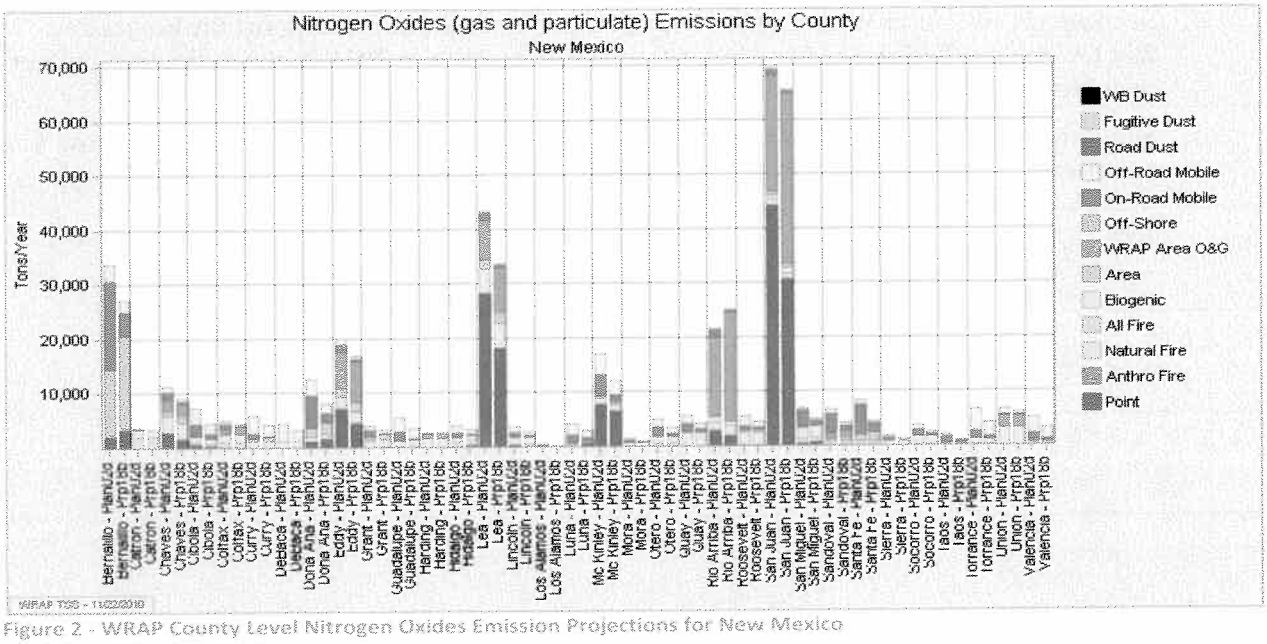

Figure 2 - WRAP County Level Nitrogen Oxides Emission Projections for New Mexico