

Comments to EPA on its Supplemental Plan to address Interstate Transport of Air Pollution for the 2015 8-Hour Ozone National Ambient Air Quality Standards and Federal “Good Neighbor Plan” Requirements for the 2015 8-Hour Ozone National Ambient Air Quality Standards for 5 states

(Docket ID No. EPA–HQ–OAR–2023–0402)¹

From: JoAnna Strother, American Lung Association

March 4, 2024

Hello, my name is JoAnna Strother and I’m the senior director of advocacy with the American Lung Association. I oversee advocacy in several states including New Mexico. I’m here today to share my support for the federal Good Neighbor Plan for New Mexico.

The Lung Association works hard to inform the public about the quality of the air they’re breathing so that they can take action to protect themselves. Throughout the Southwest, ozone pollution is a frequent worry. In our 2023 “State of the Air” report, not a single New Mexico county with monitoring data got an A grade for ozone. Four counties received failing grades.

Ozone pollution can put everyone’s health at risk, but some are more vulnerable. In New Mexico, that includes more than 29,000 kids with asthma, more than 172,000 adults with asthma and more than 90,000 people with Chronic Obstructive Pulmonary Disease.

I’ll also note that while ozone season lasts for a few or several months for Eastern States, in the Southwest ozone is a year-round threat to people’s health.

We welcome this proposed action from EPA because according to the Agency’s modelling, New Mexico is both a contributor to ozone pollution downwind and a recipient of transported ozone from out of state. The Lung Association welcomes the measures in this proposal that would require cleanup of NOx emissions from power plants in New Mexico. Not only will this prevent emissions from contributing to ozone problems in Texas, but it will also help the people that live near those polluting sources. There are real benefits to health from reducing not just ozone but also NOx.

And of course, we also welcome the fact that under this proposal, both power plants and industrial sources in Arizona would clean up emissions that contribute to our ozone problems here in New Mexico. The Lung Association applauded EPA’s inclusion of industrial sources beyond power plants when the Good Neighbor Rule was finalized, and we’re glad to see that this proposal also requires industrial sources to be cleaned up this time in Arizona.

We urge you to finalize this proposal. We also urge you to speed up the compliance deadlines – we hope to see sources running existing pollution controls this year, and to see sources without pollution controls install and run them optimally by 2026. Thank you.

1

https://www.epa.gov/system/files/documents/2024-01/11159_gn-plan-supplemental-proposed-preamble-and-rule_20231220_admin.pdf