

Message to Target:

Subject: Comment Regarding Docket No. EPA-R06-OAR-2016-0611

To: R6_TX-BART@epa.gov

Our national parks and wilderness areas in Texas, Oklahoma, New Mexico and Arkansas are part of our country's shared legacy and future. In addition, these areas are important economic engines to our rural communities and are meant to be protected by the Clean Air Act. EPA should be moving forward with a regional haze plan that would require Texas' oldest and dirtiest coal plants to clean up emissions that would help clear the skies at places like Big Bend and Guadalupe Mountains.

Unfortunately, this proposal does not achieve the goals of the Clean Air Act's regional haze program. EPA should be finalizing the Obama-EPA's source-specific BART proposal, which is backed by a strong technical record and would have required cost effective pollution controls for dangerous sulfur pollution. Instead, true to form, the Trump Administration is attempting to scrap clean air protections and prop up its friends in the coal industry.

The power plants covered by the plan create air pollution that harms Big Bend and Guadalupe Mountains National Parks in Texas, and other protected lands and wilderness areas in Oklahoma, Arkansas, and New Mexico. It isn't right for these dirty plants to continue polluting at the expense of our some of the most important and protected places.

Instead of requiring Texas's aging fleet to come into compliance with modern, industry-standard emission controls, this proposal would allow Texas's aging and uncontrolled coal plants to keep polluting at the same harmful levels. Implementing a weak pollution credit-trading program IS NOT an appropriate alternative to actual emission limits on Texas coal plants. Egregiously, this proposed rule would still award "pollution credits" to several power plants that have already retired, including the Big Brown, Monticello, JT Deely, and Welsh Unit 2 power plants. This allows the owners of those already-retired plants to transfer their pollution credits to other coal plants, effectively relieving those utilities of any obligation to reduce pollution at their remaining plants.

The coal plants that are currently operating could potentially increase their pollution under this proposal. That means power plants like Martin Lake that already impact with their pollution not only Big Bend and Guadalupe Mountains, but Dallas as well, could make matters worse under this proposal.

Texas is big sky country, but it's also home to some of the biggest sources of air pollution in the country. Now is the time for strong regional clean skies protections that work for Texas. Please reject this proposed trading scheme and put in place specific pollution limits for each of these dirty, old coal plants to protect our future.