



300 West 4th Street
Craig, Colorado 81625

March 23, 2021

Air Quality Control Commission
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South; EDO-AQCC-A5
Denver, CO 80246-1530
cdphe.aqcc-comments@state.co.us

Dear Air Quality Control Commissioners,

The City Council for the City of Craig is asking that the Colorado Air Quality Control Commission (AQCC) approve the Title V Operating Permit for the (Craig Station)/Tri-State Generation and Transmission Association, Inc. The timing of the permit request and the fact that this effort will force additional costs to be incurred while the Craig Station is compliant with all state and federal air quality regulations, is to say the least, disconcerting.

The City of Craig and Moffat County are already facing extreme economic challenges with the Craig Station scheduled to close by 2030. These challenges come in the form of job loss, business closures and indirect effects to all aspects of our fiscal integrity, including infrastructure, healthcare and our school system. We are working diligently with the Just Transition effort and with many state and federal agencies as we pursue opportunities to retool our economy. These actions are being taken before things truly become desperate, and tax revenues drop to unsustainable levels.

We understand that the AQCC takes their responsibility seriously and as such, we ask that the AQCC would support the Air Pollution Control Division, by approving the renewal of the Title V Operating permit for the Craig Station. The Craig Station is today, meeting their regulatory requirements. With the approval of the Title V Operating Permit, AQCC's decision would support and allow Tri-State to focus on operations and economic transition efforts for the area. By diverting valuable resources to address compliant efforts it limits the focus and available resources for more productive endeavors. The City of Craig is counting on some of these resources to be applied in helping our community diversify and transition to viable economic solutions.

Our community must work with partners like Tri-State and the Colorado Office of Just Transition to be successful going forward. The past year has produced several challenges including the ongoing pandemic. This challenge to the approval of the Craig Station's Title V Operating Permit threatens to add additional costly provisions for a facility with a short life and one that already complies with the appropriate regulations.

We urge the Air Pollution Control Division to approve this Title V Operating Permit for Craig Station as drafted and urge the AQCC to support that outcome. The facility is already in compliance with state and federal environmental laws and is scheduled to retire by 2030. A just and reasonable Title V Permit will

allow our community to concentrate our efforts on our transition plans and continuing to move forward rather than diverting time and resources that we do not have. Please consider our request on behalf of the Craig Station, City of Craig and the City Council working for the benefit our Community and the Region.

Thank you,

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Cc: Craig City Council
Colorado Air Pollution Control Division