

## **Visibility, Aesthetics, and Food Security: How Emissions Standards Can Impact Food Production**

**By Dan Keppen, Executive Director, Family Farm Alliance**

The Central Arizona Project (CAP) awaits a critical decision from the U.S. Environmental Protection Agency (EPA) on emissions upgrades that may be mandated for the Navajo Generating Station (NGS). The emission requirements being considered by EPA are intended to satisfy unique visibility criteria – driven in part by the proximity of NGS to Grand Canyon National Park - and they carry with them a heavy cost.

NGS is a coal-fired plant that provides 95% of the power to move Colorado River water into Central Arizona. Any added cost to that plant translates into higher bills for every single water user in the state that receives CAP water. EPA is reviewing two options it could impose to meet these unique emissions standards. Each of these options carries significant costs, but one of the alternatives is clearly preferable to CAP water users, while the other could actually drive existing surface water users out of business or force them to begin extracting limited groundwater resources rather than using renewable CAP water.

A recent report released by the National Parks Conservation Association will likely bring more political pressure to bear on this matter. The new report finds several man-made threats are contributing to the deterioration of Grand Canyon National Park, from mining to aircraft flyovers to management of the Colorado River upstream from the canyon. Notably, regional haze from power plants and cities hundreds of miles away can mar the views of the canyon, the report said. However, what is also hazy is the degree of public health and aesthetic benefits that will result from the various emissions upgrade options under consideration at NGS. When comparing alternatives, experts predict there will be no noticeable difference to the human eye but there could be a difference registered on sensitive measuring devices.

There sometimes is a limit to what businesses (and consumers, too) can absorb when government regulations increase operating costs. That is clearly the case with NGS, where costs associated with improving air emissions standards - driven in large part by concerns to protect air clarity in Grand Canyon National Park and other protected federal lands – could put some farmers out of business, and impact the economies of Southwest Tribes. And these very real costs do not even reflect possible future cap-and-trade decisions contemplated in Washington, D.C., that would also add cost to pumping CAP water to Central Arizona.

Recent EPA rule-making efforts are adding other new costs to farmers and ranchers in Arizona and other parts of the West, which I have written about previously in this column. More and more, some of the farmers and ranchers I represent question whether the federal government wants them to stay in business, or not.

And other questions remain that demand answers. What is food security worth? Is it more or less important than aesthetic values of nature? How much of the water that produces crops are we willing to shift to other uses?

The importance of this matter cannot be overstated. The potential loss of NGS has major ramifications for food security, water delivery, Native Americans, and the economy of Arizona.