APPENDIX R—STATE OF UTAH LETTER ADDRESSING AIR QUALITY

State of Utah

JON M. HUNTSMAN, JR.
Governor

GARY R. HERBERT
Lieutenant Governor

June 6, 2008

Selma Sierra
State Director
BLM Utah State Office
P.O. Box 45155
Salt Lake City, Utah 84145-0155

Dear Director Sierra:

This letter addresses air quality mitigation strategies for the six proposed Resource Management Plans being updated within the State of Utah. The state appreciates BLM's interest in this important issue.

It is the policy of the State of Utah to protect public health and the environment from the harmful effects of air pollution, to ensure that the air in Utah meets standards established under federal and state law, and to maintain an environment that is conducive to continued economic vitality and growth.

The Department of Interior monitors ozone at National Parks in the intermountain west, including: Mesa Verde National Park in Colorado, Grand Canyon National Park in Arizona, Great Basin National Park in Nevada, and Canyonlands National Park in Utah. These sites reflect conditions in areas that have not been subject to intensive development and are therefore generally indicative of background conditions. Monitoring data at these locations demonstrates a gradual upward trend in ozone levels, raising questions about ozone levels region-wide. The state believes additional information is needed regarding current conditions and the potential impacts from increasing development activity, including oil and gas activity. This information should inform future BLM decision making, but managers should not defer management actions in anticipation of better information.

Fortunately, ozone related impacts can be reduced if certain mitigation measures are required on new oil and gas related emission sources. In fact, several neighboring states currently encourage application of just such measures. BLM should include interim nitrogen oxide control measures provided by the state as a required condition of lease approval. These control measures are consistent with control measures suggested by neighboring states and jurisdictions. The state recognizes that performance standards will continue to evolve and supports technological flexibility, provided control measures are at least as effective as those in place elsewhere within the region at the time of site-specific authorization. Performance standards representing the current regional standard can be found in the *Four Corners Air*

- 1 -

Quality Task Force Report of Mitigation Options, DRAFT: Version 7, June 22, 2007. These standards are 2 g/bhp-hr for engines less than 300 HP and 1 g/bhp-hr for engines over 300 HP.

The State of Utah will continue to work with the BLM and others through efforts such as the Four Corners Task Force to address these issues. The state appreciates your cooperation in working to protect air quality related values. If you have any questions about our position, please contact me at (801) 537-9802.

Sincerely,

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- 2 -