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Forest  
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File Code: 2580

Date: April 18, 2007

Bob Bennett  
State Director  
Bureau of Land Management  
Wyoming State Office  
5353 Yellowstone Road  
Cheyenne, Wyoming 82009

Dear Bob:

Thank you for the opportunity to provide comments on the Pinedale Anticline Project Area Oil and Gas Exploration and Development Project (PAPA) Supplemental Environmental Impact Statement (SEIS) draft document. We believe by working together we can achieve the goal of providing energy development opportunities while protecting and even enhancing air quality related values (AQRVs).

We are dedicated to our stewardship role under the Organic Act and to our responsibility under the Clean Air Act (CAA) to protect and enhance AQRVs in designated Class I wilderness areas. Further, we are committed to our responsibility under the Wilderness Act to protect the same values in all wilderness areas.

We are concerned by the substantial increases in visibility impairment predicted to occur because of emissions from the PAPA SEIS project. We are also concerned about the cumulative increase in visibility impairment from this project plus other regional sources. Visibility modeling for all alternatives indicates potential adverse impacts to the Bridger, Fitzpatrick, Washakie, and Teton Wilderness Areas which would not be consistent with the resource protection provisions in CAA or the Wilderness Act. Further, in order to meet the national visibility goal (CAA §169a, 42 U.S.C. § 7491) of preventing any future and remedying any existing visibility impairment, we must attain existing and predicted visibility impairment below Forest Service visibility impairment thresholds.

We are committed to working with Wyoming DEQ, EPA Region VIII, and BLM in developing mitigation measures that meet the PAPA SEIS mitigation goal of zero days with visibility impacts (equal to or greater than the 1 deciview visibility threshold in Forest Service administered wilderness areas).

We provide the following information for your consideration and use.

**Project specific observations:**

- The PAPA visibility analyses predict adverse visibility impairment.
- Analyses for all alternatives (unmitigated) predict that the proposed project could cause visibility impacts (numerous days/year for the 20 year life of the project) over the 1.0



deciview visibility impairment threshold (the threshold is equal to or greater than 1.0 deciview) in the following six wilderness areas and are considered to be adverse by the Forest Service. In post-processing of modeling results, the BLM uses Method 6 (the first number), while the FS, NPS, and USFWS use Method 2 (the second number) to determine the potential number of days of visibility impairment.

- Mandatory Federal Class I wilderness areas (BLM Method 6 - FS Method 2)
  - Bridger (67-82 days/year)
  - Fitzpatrick (10-22 days/year)
  - Washakie (2-7 days/year)
  - Teton (1-4 days/year)
- Federal Class II wilderness areas (BLM Method 6 - FS Method 2)
  - Popo Agie (14-25 days/year)
  - Gros Ventre (8-16 days/year)
- The number of days equal to the 1.0 deciview threshold were not reported in the SEIS and would add to the above number of days of project alone impacts reported in the SEIS.
- The analyses also predict 45-61 (BLM Method 6 - FS Method 2) days/year of visibility impairment from emissions since issuance of the PAPA ROD (BLM, 2000) to the year 2005.
- We are concerned about current visibility impairment in the PAPA region and the nature of development that has occurred from 2000 to 2007 beyond what was approved in the original PAPA ROD.
- Under alternative C it is proposed that those impacts beyond the original PAPA ROD will start to be mitigated one year after the proposed project impacts are mitigated.
- Alternative C indicates that mitigation of predicted visibility impairment in wilderness areas will take place over a 5 year period after the PAPA SEIS ROD is signed. In post-processing of modeling results, the BLM uses Method 6, while the FS, NPS, and USFWS use Method 2 to determine the potential number of days of visibility impairment. For example in the Bridger Wilderness Area for mitigated BLM Method 6 predicted impacts (FS Method 2 mitigated predicted impacts not given) the mitigation sequence would be:
  - ROD signed, impacts = 67 days/year
  - After 1<sup>st</sup> year, impacts = 45 days/year
  - After 2<sup>nd</sup> year, impacts = 35 days/year
  - After 3<sup>rd</sup> year, impacts = 23 days/year
  - After 4<sup>th</sup> year, impacts = 17 days/year

- After 5<sup>th</sup> year, impacts = 10 days/year
- The analyses predict that after 5 years of mitigation there could still be 10 days/year of visibility impairment in the Bridger Wilderness Area. Added to the 7 years (2000-2007) of existing impacts, visibility impairment from the PAPA project may occur for more than 12 years.
- The CAA does not provide for any visibility impairment to occur at the start of the proposed project or during the proposed project's 5 year mitigation plan period.
- The PAPA SEIS mitigation goal of zero days of visibility impairment would not be reached under any alternative. Additional mitigation for these impacts has not been proposed.
- Cumulative modeling analyses (project plus other regional sources) for the proposed action (2009) indicate potential existing visibility impairment in the wilderness areas.
  - Mandatory Federal Class I wilderness areas (BLM Method 6 - FS Method 2)
    - Bridger (77-88 days/year)
    - Fitzpatrick (15-28 days/year)
    - Washakie (2-11 days/year)
    - Teton (2-6 days/year)
  - Federal Class II wilderness areas (BLM Method 6 - FS Method 2)
    - Popo Agie (21-34 days/year)
    - Gros Ventre (12-20 days/year)
- Please see attachment for comments on the supplemental ozone modeling analysis report.

**Project specific recommendations for consideration:**

- The FS recommends the ROD specify and require mitigation measures at the onset of the project to prevent visibility impacts in the wilderness areas from all PAPA project emissions, such as phased development for this and future energy development projects.
- The FS recommends the ROD specify that the performance goals and objectives include timeframes and mitigation milestones that demonstrate improved air quality and reduced cumulative impacts in wilderness areas in order to maintain clean visibility days and enhance quality of degraded days to; (1) comply with the Regional Haze Rule and (2) meet the PAPA SEIS mitigation goal of zero days of visibility impairment.
- The FS recommends the final PAPA SEIS include the number of days equal to 1.0 deciview and add them to the number of days of impacts greater than 1.0 deciview as reported in the draft SEIS.
- The FS recommends the ROD provide for the development of a long-term monitoring

system and an action plan to meet or exceed the stated mitigation goals including incentives for exceeding the goals and consequences if the goals are not met. The ROD should be monitored by periodically using the same air quality dispersion model, meteorological data, and input parameters used for the original analysis to ensure direct comparison of emission reductions.

- The FS recommends the ROD include provisions to annually track and report existing, approved, and projected source emissions in the planning area.
- To assess performance objectives, validate the model, and to help establish emission goals for protecting visibility the FS recommends the ROD provide for installation and long-term operation of an IMPROVE aerosol monitor near the Bridger Wilderness Area, where impacts from this project are most likely to occur.

In closing, we urge continued work with partners to evaluate and consider implementation of other potential emission mitigation solutions such as electrification of the well field, slower paced development, voluntary emission offsets from existing sources (in-field or otherwise), and energy conservation and efficiency measures.

Encouraging efficient and clean energy development consistent with protection of resources in Forest Service administered wilderness areas remains a high priority for the Forest Service. We advocate preventing additional visibility impairment, and reducing existing visibility impairment and adverse resource impacts.

We look forward to reviewing the Record of Decision and continuing our working relationship in our cooperative conservation efforts. If you have any questions, please contact Bud Rolofson at 303-275-5752.

Sincerely,

*/s/ Richard Stem (for)*  
 RICK D. CABLES  
 Regional Forester

*/s/ Jack G. Troyer*  
 JACK G. TROYER  
 Regional Forester, Region 4

cc: Mark Boche  
 Mike Dudley  
 Lindon Wiebe  
 Patricia Koppenol  
 William LeVere  
 Randy Karstaedt  
 Barry Burkhardt  
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Mike Balboni  
Greg Bevenger  
Joan Friedlander  
Jane Darnell  
Terry Svalberg  
Jeff A Sorkin  
Ted Porwoll  
Ralph Swain  
Randy Welsh

- Attachment -

U.S. Forest Service Comments on  
Pinedale SEIS Ozone Modeling Analysis Report (February 2007)

**Project specific observations:**

- The ozone modeling conducted for the SEIS did not show the high winter time ozone readings which have been observed in the Pinedale area in 2005 and 2006.
- The ozone modeling for the SEIS used a 36 km MM5 data and 36 km grids for analysis, and showed only partial data from five grid squares in Maps 2.1 and 2.2.
- Several switches used in the ozone modeling were changed from default settings.

**Project specific recommendations for consideration:**

- The FS recommends a comparison of 2018 modeled ozone to monitored summer ozone for 2005 and 2006. From that comparison a factor should be developed to extrapolate winter monitored ozone to estimate future winter ozone levels. This comparison to monitored data should also be used to validate the CALGRID modeling results.
- The FS recommends a smaller grid size (12 km MM5 is available) than the 36 km MM5 data used for the ozone modeling so that the highest predicted concentrations are accounted for in complex terrain.
- The FS recommends that the Final SEIS explain how deviations from the default settings used for the ozone modeling compare to results using the default settings.

AQ-10

AQ-8

AQ-9

FA-2-3