



United States  
Department of  
Agriculture

Forest  
Service

Intermountain Region

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DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

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

<i>[Signature]</i>	SD		RP&M
	ASD		M&LA
	OEA		DSS
	EEO		CF
	LAW		LEAD Resp.

Dear Mr. Bennett:

Thank you for the opportunity to provide comments on the revised 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 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.
- Alternatives D and E were not analyzed quantitatively and potential air quality impacts for these alternatives were not disclosed in the draft SEIS or the Air Quality Impact Technical Support Document.



- Without full disclosure of potential air quality impacts from Alternative D or E, it is not possible to determine if the proposed mitigation will be effective in reducing air quality impacts.
- 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 Forest Service (FS), National Park Service (NPS), and United States Fish and Wildlife Service (USFWS) use Method 2 (the second number) to determine the potential number of days of visibility impairment. The Method 2 numbers were reported in the initial draft SEIS Air Quality Technical Support Document but do not appear in the current draft SEIS Air Quality Technical Support Document.
  - 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 analyses also predict 45-61 (BLM Method 6 - FS Method 2) days/year of visibility impairment from emissions since issuance of the PAPA Record of Decision (ROD) (BLM, 2000) to the year 2005.
- The PAPA SEIS mitigation goal of zero days of visibility impairment would not be reached under any alternative except for Alternative D. It is not clear what the consequences are for not achieving the goal of zero days of visibility impairment for Alternative D.
- 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)

- An alternative that addresses mitigation for the existing cumulative visibility impairment should be analyzed that provides for progress in reaching the goal of natural background visibility levels.

**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 that mitigation measures be specific and that they be required mitigation and not limited to those practicable or economical.
- 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 a list of consequences or actions to be taken if the goal of zero days of visibility impairment is not met.
- 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

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Mr. Bob Bennett

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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 questions, please contact Bud Rolofson, of our Region 2 State and Private Forestry staff, at 303-275-5752.

Sincerely,



*for* HARV FORSGREN  
Regional Forester