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2009 JAN 23 AM 10: 17

Caleb Hiner
Project Lead
Bureau of Land Management
Pinedale Field Office
1625 West Pine Street
P.O. Box 768
Pinedale, WY 82941

Dear Mr. Hiner:

Please accept this letter as a comment in response to the Revised Draft SEIS. I had intended to make this comment during the January 17th public comment opportunity. Unfortunately, the success of the Anticline Operators in "filling the hall" precluded any reasonable dialogue regarding the strengths and weaknesses of the Revised Draft.

In general, I believe the Revised Draft represents a meaningful improvement in comparison to the Draft SEIS. This improvement was achieved largely by the development of the two additional Alternatives, including the Preferred Alternative. I believe the BLM staff should be congratulated for this response to the overwhelmingly negative reaction to the original Draft.

AQ-1 I-16-1 However, I strongly protest the significant weakening of the provisions relating to protection of the Class 1 air quality in the Bridger Wilderness. The change in the required response to air quality threat from "any and all available means" to the phrase, "any and all practicable means with full consideration of all resources" seems almost intended to be vague and it will almost certainly set the stage for even more air quality degradation. My concern regarding this change is based on the following considerations:

AQ-2 I-16-2

1) In its review of the initial draft, the Environmental Protection Agency (EPA) cited its strong support for the "any and all available means" provision and the "spirit" it supposedly represented among all the responsible parties. Given the expertise of the EPA in this matter, the residents of the Upper Green River Valley deserve the protection which would be afforded by this language.

AQ-3 I-16-3

2) In Chapter 3 of the Revised Draft SEIS, the BLM acknowledges that the estimated air quality-related impacts in the 2000 ROD have been exceeded by more than four times. The BLM attributes this to the fact that, as of 2005, development "had occurred at apace greater than that analyzed. Given the acknowledged analytical failure and/or the unwillingness to control the pace

AQ-3 I-16-3

of drilling, the BLM needs to be accountable for the failures of the 2000 ROD by proceeding with a much higher level of caution and control in the final SEIS.

AQ-4 I-16-4

3) Finally, with all the other negative impacts and disturbances associated with Industrializing the Anticline, it is a matter of basic fairness that the BLM would stand firm for the protection of our vulnerable air and water resources. For five years, we here have listened as the operators have said that clean drilling technology was "available" and "on the way". Now that they stand to have no winter stipulations, the immediate conversion to clean technology should be a fundamental component of the quid pro quo. Such a commitment from the Operators should then allow them to proceed comfortably with the original, strong air quality provisions.

In your final deliberations regarding the final SEIS, I hope and ask that you give serious consideration to restoring the strength of your initial Draft SEIS language as discussed above.

Sincerely,

Philip A. Washburn

CC: Chuck Otto
Robert A. Bennett
Robert E. Roberts
Gov. Dave Freudenthal

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