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Department of Environmental Quality
MAY 30 2013
Water Quality Division

Keenan Hendon
Water and Wastewater Section Manager
Water Quality Division
Department of Environmental Quality
200 West 17th Street, 2nd Floor
Cheyenne, Wyoming 82002

May 25, 2013

Dear Mr. Hendon:

On behalf of our 550 members and both the tourism and the conservation communities, this presents our opposition to the proposed Amendment of the Temporary Use Permit amendment (TUP-3344), requested by Arbor Works on the State Trust Lands near on Highway 390.

The Air Curtain Burner being proposed is inappropriate for that parcel for several reasons. It would represent an industrial usage situated near a significant area of visitor activity during both winter and summer months for its scenic values. It is also an area of significant wildlife activity in winter and summer months.

While the burning of wood materials in an Air Curtain Burner does improve emissions relative to open burning, it doesn't remove emissions completely, per Lee and Ham, 2017.

- *Past studies showed that ACBs can **reduce CO and PM emissions by 80%** compared to OPB (open pile burn) and reduce smoke opacity.*

Such an industrial application will still create undesirable emissions inappropriate for both wildlife and the visitor market. The wildlife and vistas of the Tetons bring a lot more to the State than an industrial operation at their southern edge, compromising those vistas.

We ask that Arbor Works finds a more appropriate location for their Air Curtain Burner, or simply use the composting operations that are available to them within the county, and that the Department of Environmental does not approve this request.

Sincerely,

David Sollitt
Executive Director

cc: Teton County Commissioners
Keith Gingery – Teton County Attorney