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Wyoming State Board of Land Commissioners
The Honorable Mark Gordon, Governor
The Honorable Chuck Gray, Secretary of State
The Honorable Curt Meier, State Treasurer
The Honorable Kristi Racines, State Auditor
The Honorable Megan Degenfelder, Superintendent of Public Instruction
Jenifer Scoggin, Director

April 5, 2023
Via Email

Dear Board of Land Commissioners and Director Scoggin:

On behalf of members of both the tourism and 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. This proposal will be discussed at your April 6 meeting.

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. 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 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 and that the Board of Land Commissioners not approve this request.

Sincerely,

Dave Sollitt
Executive Director

cc:

Teton County Commissioners
Keith Gingery – Teton County Attorney