# STATE OF UTAH

JON M. HUNTSMAN, JR.
GOVERNOR

OFFICE OF THE GOVERNOR
SALT LAKE CITY, UTAH
84114-2220

GARY R. HERBERT
LIEUTENANT GOVERNOR

December 18, 2007

Robert E. Roberts
Regional Administrator
US EPA Region 8
1595 Wynkoop Street
Denver, CO 80202-1129

Dear Mr. Roberts,

Re: Utah Area Designation Recommendations for the 2006 $PM_{2.5}$ NAAQS

The purpose of this letter is to transmit Utah's Area Designation Recommendation for the 2006 $PM_{2.5}$ NAAQS.

As per the guidance issued by your agency, Utah's recommendations were based on a consideration of the following nine factors:

1. Emissions in areas potentially included vs. excluded from the nonattainment area
2. Air Quality in potentially included vs. excluded areas
3. Population density and the degree of urbanization including commercial development in included vs. excluded areas
4. Traffic and commuting patterns
5. Expected growth (including extent, pattern and rate of growth)
6. Meteorology (weather/transport patterns)
7. Geography/Topography (mountain ranges or other air basin boundaries)
8. Jurisdictional boundaries (e.g. counties, air districts, reservations etc.)
9. Level of control of emission sources

Utah's "Area Designation Recommendation for the 2006 $PM_{2.5}$ NAAQS" is presented as Attachment 1. It concludes (on pg. 39) with three areas within the State that should be designated as nonattainment for $PM_{2.5}$ as shown in Figure 13 on Page 40:

- A Northern Wasatch Front nonattainment area
- A Utah Valley nonattainment area
- A Cache Valley nonattainment area

All other areas of the State not identified as areas of nonattainment should be designated as "Attainment/Unclassifiable" with respect to $PM_{2.5}$. The one exception to this recommendation concerns all Tribal Lands, over which UDAQ has no jurisdiction in such matters. It will be left to the EPA and the Tribes to designate these areas as they see fit.

During the analysis of the nine points above, there were other areas of the state that may impact or be impacted by the emissions from these proposed nonattainment areas. During the development of the State Implementation Plan, we will use complex computer models to more fully examine the sources causing these areas to violate the NAAQS, and, if appropriate and necessary, we may request an expansion or contraction of the areas of nonattainment.

With this letter, I respectfully request that your final action will reflect Utah's area designation recommendation for the 2006 $PM_{2.5}$ NAAQS.

The submittal of any further documentation which EPA determines is necessary to verify or otherwise meet the requirements of sections 110 (a) (1) or 172 of the Act, will be submitted by Cheryl Heying, Director, Division of Air Quality, and any questions your agency may have concerning this submittal should be addressed to Ms. Heying at (801) 536-4015. Thank you.

Sincerely,

Jon M. Huntsman, Jr.
Governor

Enclosures