



October 10, 2024

To: Utah Division of Air Quality
Bryce Bird, Director
John Persons, Project Manager

Re: *Comments on Additional Information from Granite Construction Company re the I-80 South Quarry (Project Number: N161200001; Site ID: 16120)*

Dear Mr. Persons,

Thank you for the opportunity to provide comments on the additional information submitted by Granite Construction Company (Granite) to the Utah Division of Air Quality (DAQ) regarding its proposed Approval Order (Order) for the I-80 South Quarry.

On behalf of Save Our Canyons, a 501(c)3 nonprofit dedicated to protecting the beauty and wildness of the Wasatch Mountains, we comment to oppose issuance of DAQ's proposed order for Granite's proposed project for the I-80 South Quarry in Parleys Canyon. This project poses significant environmental and public health risks that have not been adequately addressed in the Granite's responses to DAQ's inquiry, particularly regarding the company's compliance with opacity standards set forth in DAQ's Order. Additional information provided by Granite does not address the flaws in achieving opacity standards in DAQ's Order, or provide additional information related to how water will be supplied to the site to manage fugitive dust at the proposed project site, which Save Our Canyons has provided previous comments addressing, submitted on July 27, 2023.

One of our primary concerns in Granite's responses is Granite's refusal to provide clear and necessary information in response to the Department of Air Quality's question 5, "*Additional details on how water will be supplied to the site to meet the opacity standards in the proposed permit,*" about how it intends to meet opacity standards identified in DAQ's order, specifically how water will be supplied to the site to control fugitive dust emissions. Compliance with these standards is critical to minimizing air pollution and protecting the health of our organization's members, nearby communities, wildlife, ecosystems, and recreational users of Parleys Canyon and the surrounding recreational opportunities to visitors of the Wasatch Mountains. Granite's response merely states that a small amount of water will be needed and that "sufficient water will be available under a source or combination of sources of water."

Without a detailed plan, or an attempt to answer DAQ's questions outlining how water resources will be secured and used to meet these air quality requirements, we continue to urge denial of DAQ's proposed order on the basis that water availability for the purpose of fugitive dust mitigation has not been adequately addressed. To our knowledge, there is no water right authorized for diversion or any use at the proposed I-80 Parleys South Mine.

Water is a limited resource in the Wasatch Mountains and to Salt Lake City, and Granite Construction's inability or unwillingness to provide transparency on this critical issue raises serious concerns about their capacity to responsibly manage both air quality to meet identified opacity standards and effective water usage. Given the potential for dust generation from this proposed mining project, the absence of a reliable water source for dust suppression may lead to significant violations of opacity standards, undermining the effectiveness of the Order and contributing to poor air quality for the surrounding community and environment near the project site.

Recent research related to isotope analysis from the existing Kilgore gravel pit adjacent to the proposed I-80 South Quarry site demonstrates that significant fugitive dust is generated from the existing mining operation in Parleys Canyon. The findings “revealed that approximately 60.35% of the dust at the down canyon site originated from the quarry.” The author goes on to say, “The findings underscore the significance of atmospheric dynamics in dust transport and the potential environmental implication of the quarry operation.”¹ It is worth noting that this research was initiated well before the Tree Farm application was filed, and that the impact of dust would now be from not one, but two quarries — should DAQ approve this permit.

The impact of additional dust to the Parleys Watershed, especially during winter months, changes the timing, duration and quantity of snowmelt. The snowpack in Parleys Canyon is a primary source of drinking water to the population along the Wasatch Front. As captured in recent research, dust deposits caused Utah’s snowpack to melt 17 days earlier in 2022 than in previous years². The proposed I-80 South Quarry would contribute even more fugitive dust, even to the extent of a NAAQS violation for PM10. Current controls in the proposed permit do not adequately account for or mitigate the additional fugitive dust this mine will surely produce. Avoidance, not mitigation, is the best option here (i.e. not allowing for the creation of a new dust source in the first place in order to protect communities).

In addition, DAQ has not noticed for public comment any changes to its May 2023 Order based on Granite’s additional information or any other document in the record. As such, it is unclear how, or even if, DAQ plans to use the information provided in the first round of public comments, or Granite’s additional information in response to the RFI, to make changes to proposed conditions, requirements, or other aspects of the Order. As we understand it, DAQ is not planning to post for public comment any revised version of the Order or Intent to Approve based on Granite’s additional information. We believe DAQ’s failure to notice for public comment a revised Order and Intent to Approve based on Granite’s additional information violates its public notice duties. Thus, we request the opportunity for public comment on any amended Order and Intent to Approve.

¹ Brennan, K. (n.d.). Pilot Study on Tracing Fugitive Dust Using from the Parleys Canyon Kilgore Quarry, Utah. <https://www.hydroshare.org/resource/9554c54518534035a085fb7079fca5fa/>

² Lang, O., Mallia, D., & Skiles, M. (2023). The shrinking Great Salt Lake contributes to record high dust-on-snow deposition in the Wasatch Mountains during the 2022 snowmelt season. *Environmental Research Letters*, 18(6).

For these reasons, DAQ cannot and should not issue its proposed Approval Order to Granite Construction for the I-80 South Quarry, because the applicant cannot demonstrate a clear and sustainable plan for meeting opacity standards through responsible water usage, and DAQ has not provided notice for public comment related to DAQ's May 2023 Order. The refusal to address such a fundamental component of the approval process should be grounds for DAQ to deny its proposed approval order, in order to protect public health and the surrounding environment.

We appreciate the analysis done by DAQ, but find it lacking in several areas, as noted in these comments. It is clear that the intent to approve these activities in Parley's Canyon along with the incomplete analysis will have harmful impacts on Utahns and the environmental conditions of our region that have not been incorporated into the analysis. The lack of water on site, and the diversion of waters we can only assume would be a diversion from the Great Salt Lake (as water sources have not been furnished), need to be factors for consideration. Thank you for considering our comments and for your continued commitment to preserving the air quality and environmental integrity of Parleys Canyon and the surrounding areas.

On behalf of our members and community,



Spencer Shaver, Executive Director
Save Our Canyons