



United States Department of the Interior

NATIONAL PARK SERVICE

Air Resources Division

P.O. Box 25287

Denver, CO 80225



IN REPLY REFER TO:

N3615 (2350)

November 18, 2011

Mr. Dave Shaw, Co-President
Mr. Bruce Andersen, Co-President
NACAA
444 North Capitol Street, N.W. Suite 307
Washington, D.C. 20001

Re: Notification of Availability of the *Federal Land Managers' Interagency Guidance for Nitrogen and Sulfur Deposition Analyses*

Dear Sirs:

The National Park Service (NPS) and the U.S. Fish and Wildlife Service (FWS) have developed the enclosed *Federal Land Managers' Interagency Guidance for Nitrogen and Sulfur Deposition Analyses*, which is also available at <http://www.nature.nps.gov/air/permits/flag/index.cfm>. This new guidance supplements the FLAG (Federal Land Managers' Air Quality Related Values Workgroup) Report, and provides additional guidance to New Source Review (NSR) permit applicants and others on evaluating potential impacts to Federal Land Manager (FLM) areas from predicted increases in nitrogen and sulfur deposition due to emissions from new or modified sources. It summarizes existing and emerging deposition analysis tools and explains when and how these tools should be applied. It also reflects the FLMs' commitment to continue to develop consistent, predictable review processes for NSR permits and Environmental Assessments and/or Environmental Impact Statements under the National Environmental Policy Act (NEPA). The information and procedures outlined in this document are generally applicable to both Class I and Class II areas for evaluating the effect of increased nitrogen or sulfur deposition.

Specifically, the new guidance addresses the use of Deposition Analysis Thresholds (DATs) and critical loads when evaluating deposition impacts. The FLMs have all adopted the DATs, first issued in 2002 by NPS and FWS and described in the current document as well as in the *Guidance on Nitrogen and Sulfur Deposition Analysis Thresholds*.¹

¹ Available at <http://www.nature.nps.gov/air/permits/flag/index.cfm>

In brief, if a source's predicted contribution to deposition in an FLM area is less than the applicable DAT, the impacts are considered insignificant. If the impacts are equal to or greater than the DAT, the FLM will conduct a refined analysis. During the refined analysis, the FLM will use available information for the area to determine if deposition-sensitive resources, including streams, lakes, soils, and vegetation, might be adversely impacted by increased deposition. Available information may include critical loads, that is, the amounts of nitrogen or sulfur deposition that might be expected to cause harm to specific sensitive resources in an ecosystem. The Environmental Protection Agency used critical loads in its recent *Risk and Exposure Assessment for the Review of the Secondary National Ambient Air Quality Standards for Oxides of Nitrogen and Sulfur*² to assess the risk of acidification in U.S. streams and lakes. Critical loads are becoming more widely available in the U.S., and are available for certain FLM areas.

We hope that our new guidance will further clarify the permit review process with respect to deposition analyses. Please notify your member states, local agencies, and other interested parties as to the availability of this document. If you have any questions regarding the guidance, please contact Ellen Porter of my staff at (303) 969-2617 (Ellen_Porter@nps.gov).

Sincerely,



Carol McCoy
Chief, Air Resources Division

Enclosure

cc:

Sandra V. Silva
Chief, Branch of Air Quality Branch
U.S. Fish and Wildlife Service
7333 W. Jefferson Ave., Suite 375
Lakewood, Colorado 80235

² EPA-452/R-09-008a; September 2009. Available at <http://www.epa.gov/ttn/naaqs/standards/no2so2sec/index.html>.