



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Twin Cities Field Office
4101 American Blvd E.
Bloomington, Minnesota 55425-1665

OCT 23 2009

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OCT 25 2009

Ms. Pamela Blakley, Chief
Air Permits Section
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Blvd.
Chicago, Illinois 60604-3590

Dear Ms. Blakley:

This letter is in response to the Environmental Protection Agency's (EPA) biological evaluation (BE) of the potential impacts of the proposed issuance of a Prevention of Significant Deterioration (PSD) permit to Sappi Cloquet, LLC (Sappi), located in Cloquet, Minnesota. We received the BE on October 22, 2009. The proposed action would permit the continued operation of Sappi's existing pulp and paper mill. Gray wolf (*Canis lupus*), which is listed as threatened under the Endangered Species Act of 1973, may be present within the area that may be affected by particulate matter released by the mill - i.e., within a three kilometer radius of the facility. The EPA determined that issuance of the permit may affect, but is not likely to adversely affect gray wolf.

According to information provided in the BE, a search of the scientific literature yielded no information regarding impacts of the criteria pollutants and other heavy metal emissions on gray wolves. Therefore, analyses of these pollutants were conducted using Significant Impact Levels (SIL) developed for humans; it was assumed that concentrations below SIL would not adversely affect gray wolves. Based on air quality modeling conducted for this project, levels of particulate matter likely to be present within three kilometers of the mill would be below the SIL. In addition, modeling also indicated that National Ambient Air Quality Standards for particulate matter would not be exceeded. Therefore, we concur with EPA's determination that issuance of the permit may affect, but is not likely to adversely effect gray wolves.

For further information regarding this action, please contact me at 612-725-3548 (ext. 2201), or Mr. Phil Delphey of my office (ext. 2206, or at phil_delphey@fws.gov).

Sincerely,

Tony Sullins
Field Supervisor