



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Twin Cities Field Office
4101 American Blvd E.
Bloomington, Minnesota 55425-1665

Pamela Blakely, Chief
Air Permits Section
U.S. Environmental Protection Agency
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Blakely:

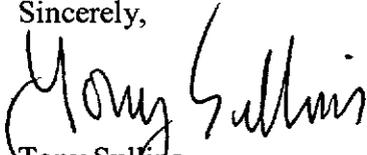
This is in response to your June 1, 2007 letter, received via email and fax on June 1, 2007, in which you requested concurrence with your determination that the proposed issuance of an air quality permit to Faribault Energy Park (FEP) may affect, but is not likely to adversely affect Minnesota Dwarf Trout lily (*Erythronium propullans*), pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 as amended (Act). FEP has proposed to modify their plant to be changed from a simple cycle to a combined cycle combustion turbine. To accomplish this, FEP will install a duct burner and backup emergency generator which is not included in their current permit.

In your June 1, 2007 letter, you identified five pollutants to be released by FEP that have the potential to affect Minnesota Dwarf Trout lily, but contend that their ambient concentrations will be too low to cause adverse effects to this species. Your analysis described a potential "worst-case scenario," combining the maximum levels predicted by modeling with the likely background levels of each pollutant. In each case, the predicted maximum ambient levels that would occur in the action area (within 3 km of the facility) were below levels shown to affect plants of high or intermediate sensitivity to the respective pollutant.

The applicant also assessed potential indirect effects of the facility operations on Minnesota dwarf trout lily due to nitrogen deposition and emissions of particles less than 10 micrometers in diameter (PM10). The assessment of nitrogen deposition was based on the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD). This analysis indicated that under 'worst-case scenario' conditions, nitrous oxide emissions would result in a nitrogen deposition rate of approximately 0.45 grams/meter²/year in the action area when combined with likely background deposition rates. This is below the level that is likely to cause adverse effects to rare plants, such as Minnesota dwarf trout lily. In addition, separate modeling indicated that PM10 emissions would remain below any the level that may cause adverse effects to Minnesota dwarf trout lily.

Based on the above factors, we concur with your determination that this action may affect, but is not likely to adversely affect Minnesota Dwarf Trout lily. For further information regarding this consultation, please contact Phil Delphey at (612) 725-3548 ext. 206.

Sincerely,



Tony Sullins
Field Supervisor