



Mr. John Bunyak
Air Resources Division
National Park Service
P.O. Box 25287
Denver, Colorado 80225

February 7, 2000

Dear Mr. Bunyak:

WESTAR appreciates the opportunity to comment on the Federal Land Managers' Air Quality Related Values Workgroup (FLAG) Phase I Report, that was announced in the November 8, 1999, Federal Register. The recommendations in the report can affect the process of permitting new sources in every state. We would like the following recommendations incorporated into the final FLAG report. Our recommendations and comments are as follows:

1. Visibility (Section D2) Decision Thresholds

We recommend that the same decision thresholds be used for both screening and refined modeling and that a less restrictive threshold be used. The FLAG report recommends more restrictive decision thresholds when more refined modeling is performed for both plume blight and regional haze. This may provide less incentive for sources to perform refined or competing source modeling. The recommended 0.4% change in extinction as the decision threshold for regional haze modeling may be difficult for new sources to meet even if this modeling is limited to days when total extinction from all sources is predicted to exceed a 10% change in extinction.

2. Visibility (Section D2) Recommended Prescription

We recommend better definitions of how the FLMs intend to treat "magnitude, frequency, duration, and other factors." Under 'Recommended Prescription,' consideration is given to "magnitude, frequency, duration, and other factors" to assess impacts (in #1). However, in #2, source contributions must comply "for all days." Do these two prescriptions contradict each other?

3. FLM Approach (Section C)

We support the recommendation that states have flexibility to decide how far to extend their analysis.

4. Ozone (Section D3)

This section states that most parks are NO_x limited with respect to ozone and that controls should be focused on NO_x. We recommend that the FLMs state that they are now depending on VOC controls for ozone at this time.

5. Deposition (Section D4)

We recommend that FLMs publish their list of impacted Class I areas in this report (which may be updated as better data becomes available) and the significant impact criteria for single source impacts at these impacted areas. As written, this section fails to clearly identify the critical loads for each Class I area. It also does not list whether certain Class I areas already have excessive deposition rates (as FLMs have informed some states evaluating new sources). For these impacted areas, FLMs have also proposed significant impact criteria for maximum new source impacts.

We also recommend that the FLMs summarize the available deposition data in the tables even if they are available in miscellaneous other reports. Currently, there are no data showing existing levels of wet or dry deposition. Instead, there are only codes and ID numbers. The main value of the tables is that they show which parks have no monitoring data at all.

Thank you for the opportunity to provide these comments and recommendations. If you have any questions, please contact Mr. Patrick L. Hanrahan, WESTAR Modeling Committee chair at (503) 229-6048.

Sincerely,



Dan Johnson

Executive Director

Western States Air Resources Council