

**Rocky Mountain National Park Initiative  
Nitrogen Deposition Reduction Contingency Plan**

**Proposed Amendment Sheet  
June 17, 2010**

**Section 1 B., bottom of page 4 – the paragraph was revised from:**

As data are collected, the MOU agencies will provide updates on the progression of nitrogen deposition reductions to the AQCC at two year intervals.

**to:**

As data are collected *and analyzed, measures are studied, and programs are implemented*, the MOU agencies will provide updates *to the public during the fall of each year via CDPHE's Rocky Mountain National Park Initiative website (<http://www.cdphe.state.co.us/ap/rmnp.html>) and to the AQCC annually. The MOU agencies will invite public comment and host an annual public meeting if requested.*

**Section 3 A, page 18 – the paragraph was revised from:**

- Regional Haze: For western states, the regional haze program will reduce NO<sub>x</sub> emissions from major stationary sources due to the Best Available Retrofit (BART) Technology provisions and from any other sources required to reduce emissions to demonstrate reasonable progress toward the regional haze goal. This Regional Haze effort should reduce NO<sub>x</sub> emissions approximately 30% by the year 2020 in the western half of the U.S. (included in this percentage are benefits from other existing programs, such as mobile source reductions).

**to:**

- Regional Haze: For western states, the regional haze program will reduce NO<sub>x</sub> emissions from major stationary sources due to the Best Available Retrofit (BART) Technology provisions and from any other sources required to reduce emissions to demonstrate reasonable progress toward the regional haze goal. This Regional Haze effort should reduce NO<sub>x</sub> emissions approximately 30% by the year 2020 in the western half of the U.S. (included in this percentage are benefits from other existing programs, such as mobile source reductions). *New emission reductions gained through the Regional Haze program (possibly thousands of tons of NO<sub>x</sub> each year) is vital to successfully reducing N deposition at RMNP. Regional Haze is driving the assessment of large NO<sub>x</sub> emitting facilities throughout the State, and emission controls implemented by 2020 should positively impact N deposition.*

**Section 3 A, top of page 20 – the following paragraph was added:**

- *“Ozone planning in Colorado over the next 10 years will also focus on NO<sub>x</sub>-emitting sources. EPA is scheduled to promulgate a new, more stringent ozone standard in August 2010 which will drive new efforts to reduce Colorado’s and the nation’s ozone precursor emissions. NO<sub>x</sub> emission controls implemented for improving ozone conditions should positively impact N deposition.*

**Section 3 A, bottom of page 20 – the paragraph was revised from:**

The Estes Park area will be incorporated into the Front Range’s AIR program as of January 2012. Based on modeling, this incorporation will result in approximately 15 tons per year NO<sub>x</sub> reduction in 2014.

**to:**

The Estes Park area is under consideration for inclusion into the Northern Front Range I/M Program. Based on modeling, this potential incorporation will result in approximately 15 tons per year NO<sub>x</sub> reduction in 2014.

**Section 3 A, bottom of page 20 – the following paragraph was added:**

*The MOU agencies will present to the public the status and findings of NO<sub>x</sub> reducing research and measures each fall via the Rocky Mountain National Park Initiative website (<http://www.cdphe.state.co.us/ap/rmnp.html>).*

**Section 3 B, page 25 – the following paragraph was added:**

*The MOU agencies will present to the public the status and findings of all ammonia reducing research and measures each fall via the Rocky Mountain National Park Initiative website (<http://www.cdphe.state.co.us/ap/rmnp.html>).*

**Section 4, page 26 – the paragraph was revised from:**

A review of this contingency plan will be conducted annually by September to coincide with the Loch Vale National Atmospheric Deposition Program (NADP) data (from previous year) review and availability. The annual review allows for timely adjustments to the contingency plan considering the latest deposition data from Loch Vale and research that identifies the most effective contingency measures. An adaptive management approach will occur throughout the implementation of the NDRP upon approval by the three MOU agencies.

**to:**

A review of this contingency plan will be conducted annually by September to coincide with the Loch Vale National Atmospheric Deposition Program (NADP) data (from previous year) review and availability. *The results of this annual review will be presented to the public each fall via the Rocky Mountain National Park Initiative website (<http://www.cdphe.state.co.us/ap/rmnp.html>).* The annual review allows for timely adjustments to the contingency plan considering the latest deposition data from Loch Vale and research that identifies the most effective contingency measures. An adaptive management approach will occur throughout the implementation of the NDRP upon approval by the three MOU agencies.

**Section 4 B., page 27 – the paragraphs were revised from:**

The MOU agencies will work together each year to update the analyses used to track nitrogen deposition at the park (Appendix B-3) with the most recently available data. They will meet annually in the fall of each year to discuss the analyses and determine whether the Contingency Plan should be revised based on new information. A summary of the meeting, glide path progress, and task developments will be available to the public and contain updated task information and nitrogen deposition data by the end of the calendar year annually. In 2013, 2018, 2023, and 2028, by a weight of evidence approach, the MOU agencies will evaluate how deposition is changing at RMNP and determine whether an interim goal was achieved. Once the three agencies concur that a goal was not achieved (“the concurrence”), the contingency process will be triggered and the MOU agencies will immediately work to identify and evaluate contingency measures for proposal and implementation, as appropriate. Depending on the contribution of various pollutants to nitrogen deposition, contingency measures may be directed towards reducing the emissions of NO<sub>x</sub>, ammonia/ammonium, or both.

**to:**

The MOU agencies will work together each year to update the analyses used to track nitrogen deposition at the park (Appendix B-3) with the most recently available data. They will meet annually in the fall of each year to discuss the analyses and determine whether the Contingency Plan should be revised based on new information. *Public input and consultation will occur prior to the plan’s revision. The RMNP website ([www.cdphe.state.co.us/ap/rmnp.html](http://www.cdphe.state.co.us/ap/rmnp.html)) will be updated after this annual meeting.* A summary of the meeting, glide path progress, and task developments will be available to the public and contain updated task information and nitrogen deposition data by the end of the calendar year annually. *Within 180 days of the issuance of the NADP data in 2013, 2018, 2023, and 2028, by a weight of evidence approach, the MOU agencies will evaluate how deposition is changing at RMNP and determine whether an interim goal was achieved. This weight of evidence approach expands the basic “glidepath” approach (which relies on a rolling 5-year average of deposition data collected at Loch Vale) presented in the 2007 Nitrogen Deposition Reduction Plan to also include an analysis of regional*

*deposition trends, N emission trends, precipitation amounts, and other factors the MOU agencies deem relevant. The findings will be posted on the Rocky Mountain National Park Initiative website (<http://www.cdphe.state.co.us/ap/rmnp.html>).*

*At the end of this 180 day period, if the agencies concur that a goal was not achieved (“the concurrence”), the contingency process will be triggered and the MOU agencies will immediately work to identify and evaluate contingency measures for proposal and implementation, as appropriate. Depending on the contribution of various pollutants to nitrogen deposition, contingency measures may be directed towards reducing the emissions of NO<sub>x</sub>, ammonia/ammonium, or both.*

**Section 4 D., page 29 – the paragraph was revised from:**

- Industrial and mobile source ammonia controls, such as:
  - Ammonia-reducing techniques at water treatment facilities

**to:**

- Industrial and mobile source ammonia controls, such as:
  - Ammonia- and NO<sub>x</sub>-reducing techniques at water treatment facilities