

Schary, Claire

From: Schary, Claire
Sent: Thursday, April 25, 2013 4:58 PM
To: Bobby Cochran; Carrie Sanneman
Cc: Gable, Kelly; Psyk, Christine
Attachments: DRAFT_JRA 2-Pager_2013 04 18_kg+cs.docx; JRA Workshop 1 Summary_4-9 to 4-10-2013_Final_kg+cs.docx

Bobby & Carrie,

Attached are Region 10's edits to the two-pager and April meeting summary documents. Please make sure you use the edits done in red since those came from our attorney Kelly Gable and I agree with her changes. The blue ones are mine, based on my own suggestions and my attempt to address comments by others who were confused about the intent of the wording.

One overall concern or what to watch in wording is to make sure it's clear that EPA is not a partner in the same way the states are. I suggest just replacing the word "partner" with "participant." We are participating in the project and supporting our states, who are the partners and playing a lead role, but we are not driving this project. Also, EPA doesn't play a role in some action items identified in the meeting summary – e.g., states' communication strategy and evaluating potential pilot projects (except maybe Idaho but only because we write the permits).

Comments specific to the two-pager:

- "Best practices" mentioned in the two-pager's introductory paragraphs but then "draft framework" emerges in fourth paragraph. That connection needs to be made more clear and also not imply that we are developing a single trading framework for our states. We need a way to better describe what the final product is that informs the states as they develop their trading programs. I think we mean to say that the states will use the list of best practices to develop their own trading frameworks and then test with their own state's pilot projects.

- Also in the two-pager, I'm not sure what you mean by "the regional agency guidance" so I took out "the" and added "that may be needed" so that it's not interpreted as we will develop agency guidance. Who knows if we even can develop regional agency guidance, so I think I need to know more about what you meant there.

- Still not clear to some here in Region 10 where the "best practices" fits in with state trading programs. I'm thinking a brief flow chart in the two-pager might help:

EPA Trading Policy → State Trading Programs/Frameworks → Trading Implementation (Credit Protocols, Credit Verification, Registry, Audit Procedures, etc.) → Pilot Projects in each state. I would highlight the Trading Implementation as the block where "Best Practices" also comes in, and then show feedback loops from the Pilot Projects block to the Best Practices block, and from the Best Practices block to the State Trading Programs block. I hope you know what I mean – but something that visually explains what step in the sequence this project is focusing on, and what it will influence and inform but not be directly writing (i.e., state trading programs – states will do that with their own public comment process).

I hope those are helpful, and please call with any questions (although I won't be in Friday, April 26 – I'm taking a furlough day). And I hope we get another chance to review the next draft before it's final – we can turn it around quickly at this end to make sure this actually becomes a final product soon.

-- Claire

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