

Schary, Claire

From: Park, Chae
Sent: Thursday, November 06, 2014 7:23 AM
To: Schary, Claire
Subject: FW: Comments on the JRA Oct. agenda

From: Schary, Claire
Sent: Thursday, September 26, 2013 3:00 PM
To: Bobby Cochran; Carrie Sanneman
Cc: Marti.Bridges@deq.idaho.gov; Bott, Dustan; Keenan, Dru; Park, Chae; Poulsom, Susan; Psyk, Christine; Rose, Bob; Stewart, William C.
Subject: Comments on the JRA Oct. agenda

Bobby & Carrie,

I agree with Marti's comments (below) about the need to talk explicitly about what goes into a permit, and how it will meet compliance and enforcement concerns. I'm also not clear why each state's permits are different on how they refer to the permittee's use of credits – i.e., referring to the state's trading guidance directly for most of the detail about credit verification, reporting, etc. versus requiring a full trading plan be submitted with each permit.

Baseline is a topic we may never get a full resolution on because of its relationship to the larger, seemingly intractable, TMDL issues, but I agree that it needs more discussion.

It's not clear to me how the mock trade will be laid out to make sure we get through a discussion of all the elements that are important to the permitting authority and not just the buyer and seller. It would probably help to have the mock trade outlined in the discussion materials you distribute before the meeting so that we can tell you where we want more clarification or see an issue that hasn't been resolved.

Finally, the pilot project discussion is not scheduled until the very end and only for 45 minutes. I thought there would be a longer discussion about how this group would participate in the pilot projects – at least, what are our preferences for reporting regularly on progress and sharing learnings as we go. Also how will the draft best practices document be characterized after this meeting – i.e., a document that remains in that draft form until the completion of the projects, or something more fluid, to capture other approaches that emerge as the pilot projects go forward?

Despite all of these comments, I defer to your good judgment on how to lay out an agenda that gets through all the topics you need covered.

I've copied my EPA team on this message, in case my comments inspire them to provide any additional thoughts.

-- Claire

Claire Schary
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From: Marti.Bridges@deq.idaho.gov [<mailto:Marti.Bridges@deq.idaho.gov>]
Sent: Thursday, September 26, 2013 1:02 PM
To: sanneman@willamettepartnership.org; Mark.Shumar@deq.idaho.gov; Michael.Mcintyre@deq.idaho.gov;
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NOMURA.Ranei@deg.state.or.us; michie.ryan@deg.state.or.us; Schary, Claire

Cc: Cochran@willamettepartnership.org; Furia@thefreshwatertrust.org; Karin@thefreshwatertrust.org; nmullane@msn.com; Tim@thefreshwatertrust.org; TGartner@wri.org

Subject: RE: Agenda for review by 9/27, meeting summary for review by 10/4

Carrie et al:

I think we need some additional discussion on how much needs to go into a permit. Since I'm of the view that many facilities may not know what kind of trade project they will do to offset their permit limits, I'm extremely leery of micromanaging that in the permit context necessarily. It doesn't lend itself at all to the concept of free market trading. That said, I also recognize that the level of detail then needs to be captured somewhere else, and that may vary from state to state. So that's my other agenda item for discussion.

I'm also curious if Washington and Oregon have thought about what practices they will pilot? I know I voiced the notion on behalf of Idaho that we would find it desirable to work with EPA on how a trading permit might look for a mock situation, likely TP in the Lower Boise, since that's what is waiting at the back door.

The remainder of the agenda looks fine. Baseline is a huge issue over here on the Lower Boise so some mutual agreement we can all live with would be nice, actually.

I'm responding on behalf of me and Michael McIntyre, so you won't get a separate response from him as he is out of the office.

Marti Bridges
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From: Carrie Sanneman [<mailto:sanneman@willamettepartnership.org>]

Sent: Wednesday, September 25, 2013 2:19 PM

To: Mark Shumar; Marti Bridges; Michael McIntyre; Darcy Sharp; FOSTER Eugene P; Helen Bresler; Melissa Gildersleeve (ECY); Ranei Nomura; Ryan Michie; Schary, Claire

Cc: Bobby Cochran; Joe Furia; Karin Power; Neil Mullane; Tim Wigington; Todd Gartner

Subject: Agenda for review by 9/27, meeting summary for review by 10/4

Hi all,

I hope everyone is enjoying the fall weather, all the better for staying inside and reviewing documents! I have a couple very short ones for you today (with correspondingly short review schedules), attached are:

1. **Draft meeting summary for workshop #3** - please review by *next Friday, October 4th* and provide comments so that we can post a version that accurately reflects our discussion.
2. **Draft agenda for workshop #4** - please review by *this Friday, September 29* and provide comments on the plan for our next gathering. We set this one up to revisit some issues that we know need more work (Baseline) and to walk through a mock trade that represents our best practices so far, which should help clarify what they all are and how they fit together. We're anticipating that this will also jog our collective memories about other issues that we need to revisit, so we've built in time to discuss them as they arise.

These will be posted on the the project wiki site shortly.

Best,

Carrie