# WRAP RHPWG Consultation & Coordination Subcommittee - notes

Conference Call June 12, 2018

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**Agenda:**

1. **Roll Call**

Rebecca Harbage (MT), Elias Toon (AZ), Neal Butt (NM), Carl Brown (ID), Julie Simson (Nez Perce), Tom Moore (WESTAR/WRAP aka WW), Frank Forsgren (NV), Pat Brewer (NPS), Molly Birnbaum (AK)

Rebecca asked if there was any preference meeting notes review before they are posted? Julie thought a good idea and asked for an email confirmation of notes.

* *Action:* Draft notes will be circulated via email in subcommittee for agreement before posting.

1. **Administrative**
   1. Notes for today: Alaska
   2. Review May 8 meeting notes: no comments
   3. Subcommittee website update:

Tom: The subcommittee website is up and running but it is bare bones for now. The webpage should be used by subcommittees as a storage vessel for what the subgroup is working on. WW will maintain the website on an ongoing basis.

Questions asked: Do we want to identify deliverables? Shall access be granted to other subgroup members? Under ‘other resources’, are there links to references for consultation? Any ideas?

Tom - WW can maintain website and WW Webmaster will post items. Potentially, there will be a list of resources for the SIP. What kind of resources to post? States may have unique sources. Federal agency Government to Government Consultation Policies may be helpful. Another example is that Wyoming posted a letter for outreach for RH in the first round as an example.

* *Action:*  Julie will draft a list of resources and examples for the website for discussion next month.
* *Action:*  Subcommittee members will review additions to Subcommittee webpage (<http://www.wrapair2.org/RHP_ConsCo.aspx>) documentation after Rebecca has it added, approve on next Subcommittee call – July 10th.
  1. Workgroup/Subcommittee updates

*Tribal WG –* Julie Simson – The subgroup updated statement of work for contractor. The contractor that will likely work on this will be the Institute of Tribal Environmental Professionals (aka ITEP). They are identifying if another contractor can do the work. The statement of work should be complete in a month. Tom – WW planning committee monthly call is good way to track progress. Subgroups will usually provide updates.

Monitoring subgroup – Elias - progress is being made. Scott Copeland will be talking in next meeting on previous data at sites. He will present behind the scene work.

WRAP Technical SC - Frank - This subgroup has a two page bulleted list of where project status is and the technical updates. The resource is added to the WRAP calendar. This format will be added monthly. Should he review in detail?

Other: FLM – Pat Brewer - Pat can’t be a FLM contact and facilitator – she will raise issue in the next meeting. Things are going well as long as there is informal communication. They will look for people to participate more in the phone call meeting tomorrow. RH action is happening at the subcommittee level. Most FLMs have been through this before and they know how to be cooperative.

Other: Need to keep tribal working group (WG) up to speed on this subcommittee WG activities. Tribal group is updating contacts at this time.

1. **Key contacts list**
   1. Review draft contact list

Rebecca - Review draft Excel spreadsheet attached to the meeting invite. It is a draft at present. She asked if the group should reach out to EPA and share the list. Tom suggested EPA provide key contacts in their review. It was suggested that other EPA regional contacts for regional haze should be included. It was questioned whether we should we include EPA regional haze subject matter experts, i.e. modeling, wildfire emissions, etc.? Discussion - Regarding the list and state identified FLMs – this came out of a survey WW did last year. It is a continuing conversation for who is identified as the key FLM contacts for each state/Class I area. Last month Frank noted that some specific Class I areas should be included. Pat said it is more important to have direct contact for Class I areas in state. She noted that not all persons would have an expert for their agency in a state. Using wildfire emissions as an example, the FLM may need to have a regional expert involved. It may be good to have a contact and then when specific needs arise, can ask Class I area for expert.

Question - Should we list all contacts we know of at this time in the spreadsheet? Response - It was agreed that we should include what we know at this time and include AQ or fire experts. Direction was given that everyone should update the list and send it back and if possible, verify the contacts.

Tom – should we allow experts to participate in RH subcommittee? Who would we contact? Pat suggests Krishna Viswanathan (EPA) who has already been participating in the regional haze discussions and regulatory provisions. Elias will reach out to him to see if he wants to participate.

* 1. Next steps
* *Action:* Subgroup members will review FLM contact spreadsheet and update for next month. Submit updates to Rebecca.
* *Action:*  Invite RH EPA representatives to sit in on phone call. Elias will reach out to Krishna Viswanathan.

1. **Timeline of key informal consultation junctures leading up to formal review periods**
   1. Seeking volunteers to draft timeline of key dates and/or process steps and who should be consulted at each juncture

The WW contractor schedule was referenced. This committee can start with that timeline. Tom commented – well developed draft but haven’t worked on it in weeks. Can start on this at the end of June. Need a proposal for contractor bid to work on this. Tom can take a stab at drafting schedule for contractor scope of work and response. It could be a small add on to existing work. He thought it would maybe take six weeks to complete.

Elias – asked if the scope of work would address only required consultation. Will there be informal consultation? Tom – each state will have their own needs for formal/informal communication on top of the required meetings. He thought that the contractor will survey states for needs, schedules and processes, or will call each state with specific questions. This will build on the email effort previously done.

Subcommittee will review? He suspects that the contractor would produce the data that this subcommittee could then distill down to a short memo for key findings and key timelines. The WW board will be interested to see if we are on schedule. The contractor work will be a small effort at an estimated $25K.

* *Action:* Tom will give an update in July to what they expect for contractor scope of work and schedule and will provide details in August.

1. **Whitepaper outlining required and recommended consultation during SIP planning process and progress report process**

It was discussed last meeting to develop a white paper for recommended consultation. Elias and Jay looked into processes before and noted that a lot went on, but no standard and level of guidance was developed. Tina sent protocols from first round of regional haze SIP planning. Discussion on what would be helpful to include in white paper.

Question of lessons learned from round 1 - was there any problems with consultation levels of effort? Tom remembered there was a lot of discussion and consultation on BART facilities on both the regional and national level. People were looking at modelling results to provide a general context and to give a level of consultation results. At the actual SIP level he was not involved and does not know. States did consultations on informal basis. North Dakota and Colorado had to consult with other states outside of WESTAR for class I areas. At this stage, outcomes on consultation efforts are premature. Maybe this is all that needs to happen in this planning effort. Maybe we all suggest the ‘reasonable consultation’ that needs to occur.

Frank – good summary of first round. Of interest this time around is how we go about negotiating between states for emission reductions. What format will this take this time? Should have further discussion? Discussion – When we look at deliverables, we will end up with a White paper protocol that incorporates Contractor data and what different states have to do. Is it too early to put together an outline? Should we have a volunteer to put together a topic list? Volunteers were sought to put together and outline for discussion at the next meeting. Molly volunteered to start an outline and Pat will help but she is not sure about Tribal coordination/consultation. It was suggested to include required tribal consultation for federal agencies and later include whether State’s also have specific required consultation. Perhaps the contractor can survey which states have committed to Tribal consultation (government to government) committed to by federal agencies.

Tom – in this regional haze planning period round – if WW states use 4 factor analysis to screen out controls for FLM consultation and uses to analyze for regional modeling. When the analysis goes forward they will become a part of the record. A state can offer what they can do for controls and downwind states. It would help if we identified criteria for commitment for controls. Should they go into SIP? Perhaps incorporate a set of screening criteria for control measures that comes out of the 4-factor analysis. General guidance and protocols would be helpful for the planning conversation.

* 1. Seeking volunteers to draft an outline for review on July call
* *Action:* Molly and Pat will work on first draft on topics for possible white paper.

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*The meeting ran out of time at this point. \*\*\*\*\*\*

1. **Discussion: What type/level of guidance do states want?**  This topic was combined with the discussion of agenda item #5 above. Carry discussion forward to July meeting as needed.
2. **Next Call:** July 10th at 200 PM MDT / 100 PM AZ/PDT (notes: Arizona)