From: OLIPHANT Margaret
To: VANDEHEY Maggie
Subject: RE: LRAPA Stmt of Fiscal/Economic Impact for rulemakings
Date: Wednesday, February 06, 2013 8:26:52 AM

Could I come meet with you in person to discuss at 1 PM today?

From: VANDEHEY Maggie
Sent: Wednesday, February 06, 2013 8:20 AM
To: OLIPHANT Margaret
Subject: FW: LRAPA Stmt of Fiscal/Economic Impact for rulemakings
Importance: High

Hi,

There are no requirement for Financial Services to sign off on the fiscal but there are requirements that I sign off when submitting to SOS. I rely on Financial Services' approval. Having an inadequate fiscal risks is the major reason for challenging our rules. I would ask Jim what LRAPA needs to submit but let's review what he has to say before we ask LRAPA to provide additional information. The fiscals have language that raise flags; I think we can reword some of this.

I took a few minutes to edit part of the PM2.5 fiscal. We need a short introduction about our relationship between LRAPA and DEQ. This is in the wrong format for our public notice and the organization will make it hard to submit using the online form.

DOCUMENTS REQUIRED FOR NOTICE
We need to complete the following documents for Notice:

Announcement
About the Proposal
Proposed Rules

I will load the blank documents to folder 4-Public Notice on rulemaking SharePoint site after we decide if we are going to combine them into one public notice. If we do that, we'll need an appropriate name.

There are three rulemakings on our Proposed Rules that have examples of these documents.

SCHEDULE
If we are publishing in the March 1 Oregon Bulletin, here is the very tight and close to undoable schedule:

February 14 Complete and submit About the Proposal to SOS. I have a furlough day on Friday and Nicole was my backup for online submittal. and filing.

February 28 Final day to post all three documents to the website and required notices (GovDelivery, other lists, key legislators.) This means they need to go through internal review. About the Proposal becomes part of the staff report; therefore, we have a stringent review before

notice.

March 15 First date for public hearing is any.

I have plenty of things to do but I would donate a few hours on Friday if you are determined to make the February 14 deadline. I would work on moving the information to NOTICE.About the Proposal-4.00 and doing some organization.

Maggie

From: OLIPHANT Margaret
Sent: Tuesday, February 05, 2013 3:51 PM
To: VANDEHEY Maggie
Subject: FW: LRAPA Stmt of Fiscal/Economic Impact for rulemakings
Importance: High

Maggie,

Since we spoke a few minutes ago, I ran into my first roadblock. Roys doesn't want to sign off on LRAPA fiscals (see his e-mail below) although Nicole noted in another e-mail that he had done so in the recent past! Do you know if DEQ sign off on the fiscal is necessary?

Thanks,
Margaret

From: WILLIAMS Robin G
Sent: Tuesday, February 05, 2013 3:45 PM
To: OLIPHANT Margaret
Subject: FW: LRAPA Stmt of Fiscal/Economic Impact for rulemakings
Importance: High

Email with attachments.

Robin Williams
Air Quality Budget Analyst
Oregon Department of Environmental Quality
(503) 229-5316

From: ROYS Jim
Sent: Tuesday, January 15, 2013 1:34 PM
To: VICK Nicole R.
Cc: OLIPHANT Margaret; GINSBURG Andy; WILLIAMS Robin G; NELSON Kerri
Subject: FW: LRAPA Stmt of Fiscal/Economic Impact for rulemakings
Importance: High

Nicole,

Although Robin and I looked through the attached fiscal statements, I am uncomfortable with

"signing off" or "approving" fiscal impact assessment produced by an organization outside of DEQ, even if those assessments are produced on DEQ document templates. Reviewing our own internal fiscals is challenging enough, and I don't know how I would go about confirming the LRAPA assertions that the impacts of the rule changes are net revenue neutral. I looked through the LRAPA/DEQ joint rulemaking contract, which does not address a DEQ approval of a LRAPA FIS.

If AQ feels that review of LRAPA FIS is something to be addressed, we can have a conversation about what information LRAPA would need to send. That review would need to get billed to the LRAPA Q-Time centers. Obviously, with 24 hours notice, that won't be happening this time around.

Jim Roys
Financial Services Manager
Oregon DEQ

From: WILLIAMS Robin G
Sent: Tuesday, January 15, 2013 8:20 AM
To: ROYS Jim
Subject: FW: LRAPA Stmt of Fiscal/Economic Impact for rulemakings
Importance: High

Jim, The program needs to get this submitted today if possible. I've checked it over, and things look to be in order.

Robin Williams
Air Quality Budget Analyst
Dept. of Environmental Quality
(503) 229-5316

From: VICK Nicole R.
Sent: Monday, January 14, 2013 3:25 PM
To: WILLIAMS Robin G
Cc: INAHARA Jill; DOWNING Kevin; Robbye Lanier
Subject: LRAPA Stmt of Fiscal/Economic Impact for rulemakings

Hi, Robin-

Thanks for looking these over. Here's a quick overview:

- 2008 Open burning - minor rulemaking that mostly impacts residential open burning
- 2008 Industrial Streamlining - major streamlining event that mirrored AQ's streamlining (SPPIT I and SPPIT II) rulemakings
- 2010 Industrial Streamlining - cleanup of the 2008 effort
- 2011 PM2.5/GHG and NSR/PSD - the FIS and info mirror our rulemaking adopted in April 2011.

Some of the forms have different formats. However, we do perform online filings now, so Maggie takes sections and inserts into the SOS online system and I made sure each FIS has those categories. Robbye from LRAPA took the forms from SOS website and since DEQ is changing the rulemaking process, Maggie is familiar with the oddities.

Thanks, again, Robin! Let me know if you have any questions.

Thanks!
Nicole