From: OLIPHANT Margaret
To: CURTIS Andrea
Subject: FW: LRAPA Stmt of Fiscal/Economic Impact for rulemakings
Date: Friday, May 03, 2013 4:03:54 PM

From: VICK Nicole R.
Sent: Tuesday, January 15, 2013 1:51 PM
To: ROYS Jim
Cc: OLIPHANT Margaret; GINSBURG Andy; WILLIAMS Robin G; NELSON Kerri
Subject: RE: LRAPA Stmt of Fiscal/Economic Impact for rulemakings

Jim,

I agree that it is a good idea to open this conversation up. Although the joint rulemaking contract has been helpful, we have discovered there are a few areas that are a bit vague. I'd like to be sure we are all on the same page, too.

I'm a bit confused as there have been two recent DEQ/LRAPA joint rulemakings where DEQ's budget office has signed the FISs.

Let me know when is a good time to discuss.

Thanks,
Nicole

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