From:	INAHARA Jill
To:	"VANDEHEY Maggie"
Cc:	GARTENBAUM Andrea
Subject:	RE: 2014 Permits Rulemaking stat auth and implem garrahan redline
Date:	Thursday, May 29, 2014 1:27:37 PM
Attachments:	image004.png

Did you decide what to do about 468A.035? Paul's comment:

> Every rule that is made part of the SIP is, in a way, implementing ORS 468A.035, the statute that directs DEQ to develop the SIP, with EQC oversight. That said, I have not consistently included 468A.035 in the "implemented" section of every single rule. I've done it more often when the rule more directly addresses SIP adoption or compliance.

Thank you,
Jill

From: VANDEHEY Maggie [mailto:maggie.vandehey@state.or.us]
Sent: Tuesday, May 27, 2014 11:19 AM
To: VANDEHEY Maggie; GARRAHAN Paul
Cc: INAHARA Jill
Subject: RE: 2014 Permits Rulemaking stat auth and implem garrahan redline

Paul,

Thank you for doing this. I'll start a worksheet to identify rules that have already had this accuracy check.

I may have questions after I look this over.

Maggie Vandehey, EIM
Department of Environmental Quality | 34000
811 SW Sixth Ave., Portland, OR 97204-1390 | vandehey.maggie@deq.state.or.us
503.229.6878 | In OR 800.452-4011 | 🖶 503.229.6730

The real voyage of discovery consists not in seeking out new landscapes, but in having new eyes.
ATTRIB. MARCEL PROUST, 1871-1922

From: Garrahan Paul [mailto:paul.garrahan@state.or.us]
Sent: Tuesday, May 27, 2014 10:30 AM
To: VANDEHEY Maggie
Cc: INAHARA Jill
Subject: 2014 Permits Rulemaking stat auth and implem garrahan redline

Maggie: My proposed edits to the statutory authority and statutes implemented references in the proposed rules are attached. I note that implementing some of these changes may result in successive rules within the same division having very different such references. That could be awkward, but I think it better to make these references more accurate than to continue inaccuracies (and generalities) for the sake of consistency.

Also, in the course of my review I identified two rules where I'm recommending language changes to the rules—OAR 340-200-0050 and OAR 340-210-0010.

Please let me know if you have any questions or would like to discuss this further.

Paul Garrahan
Acting Attorney-in-Charge, Natural Resources Section
Oregon Department of Justice
Portland 971-673-1943 (M, Th, F)
Salem 503-947-4593 (Tu, W)
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