all redactions: internal agency, pre-decisional deliberative communications

From: McKaughan, Colleen
To: Glosson, Niloufar; Lee, Anita
Subject: RE: renewable language that was taken out and the current language in the notice
Date: Wednesday, September 25, 2013 10:02:00 AM

Thanks!

From: Glosson, Niloufar
Sent: Wednesday, September 25, 2013 9:59 AM
To: McKaughan, Colleen; Lee, Anita
Subject: RE: renewable language that was taken out and the current language in the notice

I made that very very clear. [redacted]

Thanks,

- - Niloufar

Niloufar Nazmi Glosson
U. S. Environmental Protection Agency
D: (415)972-3684| **C**: 415-328-1143| **E:** Glosson.niloufar@epa.gov

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From: McKaughan, Colleen
Sent: Wednesday, September 25, 2013 9:56 AM
To: Glosson, Niloufar; Lee, Anita
Subject: RE: renewable language that was taken out and the current language in the notice
Importance: High

[redacted]

From: Glosson, Niloufar
Sent: Wednesday, September 25, 2013 9:53 AM
To: McKaughan, Colleen; Lee, Anita
Subject: FW: renewable language that was taken out and the current language in the notice

Sorry, meant to cc you on this.

Thanks,

- - Niloufar

Niloufar Nazmi Glosson
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From: Glosson, Niloufar
Sent: Wednesday, September 25, 2013 9:44 AM
To: Keener, Bill; PerezSullivan, Margot; Zito, Kelly
Subject: renewable language that was taken out and the current language in the notice

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The only mention of renewable in the current Notice is what's below.

Page 11: **Given the extent of federal and tribal interests in NGS, on January 4, 2013, EPA, DOI, and the Department of Energy (DOE) signed a joint federal agency statement (Joint Statement)**

committing to collaborate on several short- and long-term goals, including analyzing and pursuing strategies for providing clean, affordable, and reliable power, affordable and sustainable water, and sustainable economic development to key stakeholders who currently depend on NGS.[1] The Joint Statement also recognizes the trust responsibilities of the Federal government to Indian tribes.

Page 18-19: Technical Work Group Agreement

On July 26, 2013, a group of stakeholders known as the TWG and composed of the Central Arizona Water Conservation District (CAWCD), the Environmental Defense Fund (EDF), the Gila River Indian Community (Gila River, or the Community), the Navajo Nation, SRP, on behalf of itself and the other non-federal Participants, the Department of the Interior, and Western Resource Advocates, submitted a document memorializing a multi-party agreement (the TWG Agreement) to EPA for consideration.[2] EPA had attended a "kick-off" meeting for the TWG on March 21, 2013, at which we described our February 5, 2013 proposal, but EPA did not have any further participation in the TWG.[3] As described in Section III of the TWG Agreement, "Summary of Agreement Elements; Reasonable Progress Alternative to BART, Obligations of Support, and Reservation Right", the Agreement consists of seven elements: (1) a description of a "Reasonable Progress Alternative to BART" (the TWG Alternative);[4] (2**) a study of options by Reclamation for replacing the federal share of energy being generated from NGS with low-emitting energy; (3) commitments by Interior to reduce or offset emissions of carbon dioxide (CO_2) by three percent per year and facilitate the development of clean energy resources; (4) commitments by Interior to mitigate potential impacts from EPA's final BART rule to Affected Tribes; (5) a commitment by Interior to carry out the Phase 2 Study by the National Renewable Energy Laboratory (NREL) for the purposes of studying options for the future of NGS;** (6) a commitment by SRP to make funds available for a Local Benefit Fund for community improvement projects within 100 miles of NGS or the Kayenta Mine; and (7) a summary of obligations of the Parties to the Agreement and miscellaneous legal provisions.

Thanks,

- - Niloufar

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[1] See document title “2013_0104 Joint Federal Agency Statement on NGS” within document number 0005 in the docket for this proposed rulemaking at EPA-R09-OAR-2013-0009.

[2] See “Technical Work Group Agreement Related to Navajo Generating Station (NGS)” dated July 25, 2013, and submitted to EPA on July 26, 2013, in the docket for this proposed rulemaking at EPA-R09-OAR-2013-0009-0122.

[3] See document number 0033 in the docket for the proposed rulemaking at EPA-R09-OAR-2013-0009.

[4] The “Reasonable Progress Alternative to BART” is a term from the TWG Agreement. EPA interprets this term to have the same meaning as an Alternative to BART or a “better than BART” Alternative, however, we do not otherwise use this term in today’s Supplemental Proposal.