

LAKE MICHIGAN AIR DIRECTORS  
CONSORTIUM

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CR09

February 17, 1995

John Seitz, Director  
Office of Air Quality Planning and Standards  
MD-10  
Research Triangle Park, NC 27711

Dear John,

We are quite pleased with the progress the agency has made on the development of options for ozone attainment demonstrations. The workshops on February 6 and 7, held in Durham, North Carolina, enabled a number of stakeholders to discuss issues and implications arising from the proposals put forward at the Clean Air Act Advisory Committee and at the meeting in Washington, DC, last week. Based on these discussions, the Lake Michigan states feel confident that an attainment demonstration can be developed for the region by the deadlines indicated.

However, there are two important issues which have yet to be resolved. First, is the need to provide assurances to states that they will not be subject to SIP calls based on the perceived needs of other states to reduce boundary conditions prior to completion of the regional modeling. We feel that this issue should be discussed among the states at the first opportunity. Second is the issue of superregional modeling. Tom Helms stated at the Durham workshops in Durham that LADCO was the only organization which would be doing any regional modeling. It has been our understanding all along that USEPA, either directly or through MOCA, would also be conducting regional modeling, particularly in areas such as the southeast or Texas. In addition, Mary Nichols agreed, in her responses at the NGA/ECOS meeting that the USEPA would "take the lead" on this effort. While these issues will not delay the overall policy, we would like to open discussions as soon as possible, to provide us with the certainties our elected officials and industries need to support this approach.

The Lake Michigan states are committed to working with you to develop and implement this policy, to supporting your efforts to promulgate needed national controls and rules, after input from states and other interested parties and to providing any assistance we can in the area of emissions reduction trading. We look to you, in turn, for a timely response on the issue of boundary conditions, and for national leadership on the question of additional Phase 2 modeling.

Sincerely,

*Timothy J. Method*

Timothy J. Method, Chairman  
Indiana Department of  
Environmental Management

*Dennis Drake*

Dennis Drake, Vice Chairman  
Michigan Department of  
Natural Resources

*Donald F. Theiler*

Donald F. Theiler, Secretary  
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