

**DRAFT**

**Potential Comments by TDWG at WRAP TSC Meeting - December 2018**regarding
Tribal Communications & Consultation, the Consultation and Coordination Subcommittee, and the DRAFT "WRAP Communication Framework for Regional Haze Planning"
November 23, 2018

*The following thoughts and ideas are intended for the sole purpose of serving as "talking points" that may be shared by the WRAP's Tribal Data Work Group at the Technical Steering Committee winter meeting in December 2018. Further, all discussion points are intended to constructively advance the work of the Consultation and Communication Subcommittee as it pertains to Tribal outreach and consultation with Tribes.*

Basic Principle (suggested)

All Western Tribes will benefit from informed awareness of the importance of regional air quality challenges, regional haze, the national visibility goal, and the role of the WRAP in achieving that goal.

The WRAP should develop and implement an outreach strategy that will continuously engage and inform all Western Tribes.

Communication

The "tiered approach to communication" in regional haze planning, as described in the draft "WRAP Communication Framework for Regional haze Planning", could be effective for Tribes. For example broad Tribal awareness, including opportunities for participation in this regional haze planning, are important. The action items in Tier One of the Communication Framework, e.g. webinar(s) can and should be expanded to include other effective communications techniques. Effective Tier One outreach will facilitate the WRAP's objectives by Tribes' self-identification and expressions of interest in subsequent Tiers. Communication actions in Tiers Two and Three also can be expanded to encourage the broadest feasible Tribal awareness and sustained participation.

Consultation with Tribes

The Consultation and Coordination Subcommittee is aware of the importance and necessity of effective informal and formal consultation with Tribes in the WRAP's, and WRAP members', planning and policy development processes. The draft "Communication Framework...", including *Section 3. Consultation Requirements* includes strategies and timelines for communication, collaboration and some consultation. Consultation with Tribes, however, is addressed principally by reference to regulatory language. The important topic of consultation with Tribes should be clarified in the Framework, and should be addressed either through significant modifications and additions to the Framework or as a separate work product of the Tribal Data Work Group and Consultation and Coordination Subcommittee.

Tribal Implementation Plans

The draft Communication Framework is directed at the regional haze requirements facing states and FLMs, and the important role of the WRAP. Some WRAP Tribes may choose to promulgate or modify Tribal Implementation Plans (TIPs) to include regional haze. Such Tribes and the WRAP would benefit by having associated guidance on communications, collaboration and consultation.