



INTERVIEW

Last issue, Resources wrote about the difficult regulatory issues that arise due to the drift of ground-level ozone across state lines. This issue, we follow up by interviewing Mary Gade, who was chair of the Ozone Transport Assessment Group (OTAG), an unprecedented venture in federal-state environmental cooperation. Bringing together the federal EPA, 37 state governments, and industrial and environmental organizations, OTAG mapped and quantified the movement of ozone to provide a base for national policy. Ms. Gade, who now practices law in Chicago, is a member of RFF's board. The interviewer is J. W. Anderson, RFF's journalist in residence.

Q: OTAG was a unique federal-state experiment. What did it achieve?

Gade: It achieved something that had never been done before in this country. It established a technical database for a difficult scientific problem and did it collaboratively so that it actually had the support of industry, the environmental community, and the government. And because of that database, the group was able to assess control measures and strategies to address this problem of ozone transport.

Q: Interstate transport is inherent in a lot of pollution control policies, particularly air, particularly water. Is OTAG a good precedent for other interstate problems with pollution?

Gade: It's an outstanding model for many of the environmental problems that we are going to face in the future: not just air problems—anything that crosses state boundaries or regional boundaries. It's going to be incredibly important as a model for issues like regional haze, mercury, issues in the Clean Air Act like new source review—issues in which people have a lot at stake.

Q: As chair of OTAG, you were presiding over a big roomful of people representing very different interests. What were the problems in running OTAG?

Gade: Surprisingly, there were not as many

problems as you would think. And I can say that as chair, because I had such excellent people working with me to help run this behemoth organization. I had superb help from people like Bob Shinn, the environment commissioner for the state of New Jersey, who took over the modeling and assessment effort, the technical side of



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the equations; and Don Schregardus, the Ohio commissioner, who took up the control and strategy approach; and all the people who worked under them.

But it was a huge logistical problem. One of the things that was a hallmark of

OTAG, and something I recommend strongly to those who take up this kind of effort in the future, is that it was considered open in every respect. There were no secret meetings; there were no forums in which people were excluded from the action.

So consequently we spent literally hundreds of thousands of dollars a month on conference calls in which any person could join. We spent lots of money doing transcripts of meetings so that they could be put up on a Web site and anybody could find out what was going on, to ensure the openness of the process.

Q: Was OTAG a success?

Gade: Absolutely. It was a huge success. OTAG commenced its work in May of 1995 and concluded it in the first week of June 1997. So within a two-year span it did this immense amount of scientific research and an immense amount of pulling together technical and economic analyses of control measures. But its mission was directed at the one-hour [national ambient air quality] standard [for ozone], the 120 parts per billion standard. And one month after OTAG completed its work [the United States Environmental Protection Agency] in essence changed the entire universe and proposed an eight-hour standard at 80 parts per billion.

Q: During the process, some of the people who were taking part expressed concerns

that EPA at the end of the day would take your technical results and simply dismiss your policy recommendations. Did the EPA keep faith with this process?

Gade: That's a very difficult question, and the reason it's difficult is because the entire framework switched the moment EPA proposed a different standard. We had quite conscientiously and persistently kept the dialogue to the one-hour standard. Even when EPA started making noises that they were going to be recommending an eight-hour standard, and actually discussed at OTAG meetings some of the health effect issues and the questions about where they would put that standard, OTAG single-mindedly adhered to the mission in its charter, which was to try to find mechanisms for meeting the one-hour statutory requirements. So I continue to be saddened, I guess, by the fact that we never got to find out whether EPA would have adhered to the recommendations we made in OTAG, and whether they would have worked, whether the various entities that had collaborated and agreed with this process would have continued to collaborate and allow it to move forward. But we will just never know, and that's the problem.

Oh, by the way, I don't think there was any Machiavellian scheme.

Q: It was simply that one standard was overtaken by another on a different track?

Gade: Precisely.

Q: What advice would you have to another OTAG experiment in dealing with interstate pollution, other than maintaining openness?

Gade: I really think it is key to identify the stakeholders, the interest groups that need to participate, and make sure that you facilitate that. One aspect that was very

important in OTAG was making sure that the environmental community was represented and could afford to be represented. It was hard for the environmental community because there were so many meetings taking place. Literally there would be dozens in any given month on various important topics and for the environmental community it was very difficult to participate in all of them. That's something that has to be addressed the next time this kind of large effort is undertaken. We did try.

One of the things I think was good about OTAG was that it not only pulled in the national environmental groups: we made a concerted effort to pull in grass roots groups that would be representative. We had people from Wisconsin, we had people from the Northeastern states at these meetings, and I think that's really important.

But another thing to understand is that although government may be taking the leadership role, it becomes essential actually to allow, and meaningfully allow, industry to participate. I got excited at the point in OTAG when industry started running with things.

Q: The transport turned out not to be as long-distance as many people had thought and argued going into this.

Gade: I think it was one of the incredibly important things that came out of it. Some people want to say, "Oh, it was a bunch of noise for nothing." It's not true.

Q: The upshot is that we have a good series of recommendations that EPA did not quite follow. How important are those variations? EPA has gone to a slightly more restrictive standard and it cut off the last round of modeling that you recommended. How important was that?

Gade: That was really significant to the trust and faith element of this whole thing. It was those two things that you just men-

tioned that in some ways were the reason we were able to achieve consensus on such a difficult issue. The Northeast desperately wanted the most stringent standard uniformly across the domain, across the states that were participating in this. But it was willing to concede that perhaps the South and the Midwest might actually have different numbers [for power plants' emissions limits]. That was an immense achievement.

At the same time, it was equally difficult for the South, who had, based on their analyses, their own concerns. They were convinced that they didn't want to be connected with anything that had that most stringent number in it. For them to concede that yes, perhaps others had to do that, and to put themselves in that same basket was a huge concession. And so when EPA, several months after OTAG completed its work, said it's a uniform number across the entire domain of 22 states that we are regulating and that is the most stringent number, and, by the way, forget all that regional modeling and state modeling you were going to do to refine this data—that was extremely disappointing.

Q: What can RFF do usefully as this process goes on, of interstate analysis and increasing reliance on scientific data on which to base recommendations?

Gade: One of the most impressive things about RFF is its economic grasp of these difficult policy and technical issues. And OTAG could have really benefited from input from such sophisticated groups as RFF when we were considering the possible control strategies—ones that were currently in place, ones that were anticipated. It would have been immensely complicated to do a matrix to try to put values on them and compare costs, a Herculean effort. But I think we could have really benefited from further analysis and some better parameters to frame those kinds of decisions for policymakers. ☺