

Conversation Contents

Fwd: (FOIA 4 of 6) Fwd: Guidance on E.O. 13783

"Bobo Jr, Anthony" <a1bobo@blm.gov>

From: "Bobo Jr, Anthony" <a1bobo@blm.gov>
Sent: Fri Aug 18 2017 16:51:53 GMT-0600 (MDT)
To: Thomas Bartholomew <tbarthol@blm.gov>
Subject: Fwd: (FOIA 4 of 6) Fwd: Guidance on E.O. 13783

Anthony D. Bobo, Jr.

Branch Chief Decision Support | Division of Decision Support, Planning and NEPA | Bureau of Land Management
20 M Street SE | Cubicle 5210 | Washington, DC 20003
O: (202) 912-7211 Cell: (202) 422-2087

----- Forwarded message -----

From: **Moore, Rebecca** <rmoore@blm.gov>
Date: Thu, Aug 17, 2017 at 4:18 PM
Subject: (FOIA 4 of 6) Fwd: Guidance on E.O. 13783
To: Anthony Bobo <a1bobo@blm.gov>

----- Forwarded message -----

From: **Ford, Michael** <mmford@blm.gov>
Date: Thu, Apr 13, 2017 at 12:41 PM
Subject: Re: Guidance on E.O. 13783
To: Rebecca Moore <rmoore@blm.gov>
Cc: Robert Winthrop <rwinthro@blm.gov>

Thank you Rebecca.

For clarification, would you like me to recommend to Mark and Stu that we hold off on speaking until you hear from the Planning Division Chief? I wasn't sure whether me not doing anything encompassed seeking further guidance, or just making any concrete statements/actions.

Could you let me know whether you have a moment to discuss? I just want to make I have the right understanding on how to proceed.

Thank you,
Mike

On Thu, Apr 13, 2017 at 2:22 PM, Rebecca Moore <rmoore@blm.gov> wrote:

Hi Mike,

The EO didn't just disband the IWG, it withdrew the Technical Support Documents that reported the

SCC estimates. I don't have any official BLM interpretation, but I take it to mean we can't use those estimates. I'm making inquiries up the BLM leadership chain as to what BLM's policy will be on addressing SCC without those estimates (given the other estimates available).

Our informal guidance for the past several years is that any discussion of SCC in planning or NEPA (either saying why we won't report it, or including the estimates) needs to be coordinated with the WO socioecon program (i.e., me). Most of the time, we have not included such estimates and have fairly consistent language for responding to protests. That language needs to change in order to reflect this E.O. Again, I'm waiting for direction from above on this.

For now, I just ask that you not do anything before we run it through our Planning Division Chief.

-R

From: Ford, Michael [mailto:mmford@blm.gov]
Sent: Thursday, April 13, 2017 12:04 PM
To: Rebecca Moore <rmoore@blm.gov>
Subject: Fwd: Guidance on E.O. 13783

Hi Rebecca -

I think you may have just mentioned that the disbanding of the IWCC meant that we'd no longer be using SCC estimates in our analyses (I believe it was you speaking but if not let me know).

James and I were trying to answer that very question with respect to a couple of the coal lease modifications that we're working on with COSO. I reached out to Mark Lawyer and Stu in the email below to see if they'd be issuing any guidance on that, but it sounded like you may already have a more solid idea.

I head out to the airport at 3:30 today but was wondering if you may have a free moment to discuss? If not it can always wait until I'm back on the 25th.

Thank you!

Mike

----- Forwarded message -----

From: Ford, Michael <mmford@blm.gov>
Date: Thu, Apr 13, 2017 at 12:20 PM
Subject: Guidance on E.O. 13783
To: Mark Lawyer <mark_lawyer@ios.doi.gov>, Stuart_Levenbach@omb.eop.gov
Cc: "Tichenor, James" <jtichenor@blm.gov>

Hello Mark and Stu,

First off, I wanted to say that I really enjoyed the panel that you both did with Marty Heinze last Wednesday at the DOI Economics Workshop. You all touched on some really important topics related to how agencies will be expected to comply with the requirements set forth in E.O. 13771. The additional April 5th OMB guidance helped clarify a lot of questions we had.

My colleague James and I were also wondering if there are plans for OMB to issue guidance about implementing Section 5 of E.O. 13783, specifically how to treat Social Cost of GHG emissions from other research (aside from the IWG). This guidance will help us move through the complexities of our regulatory revisions, and numerous EIS, EA, and other NEPA docs that have referenced analyses that use the SC of GHG emissions.

We discussed this matter yesterday with a couple of colleagues - Christian Crowley and Adam Stern in DOI-OPA. We would be interested in a discussion, if you are available. However, if there is impending guidance, maybe we could hold a call after we are able to review. Would either of you know what the status might be on issuing such guidance?

Thank you,

--

Michael M. Ford

Economist

Bureau of Land Management

mmford@blm.gov

w: 202-912-7623

m: 202-774-8530

--

Michael M. Ford

Economist

Bureau of Land Management

mmford@blm.gov

w: 202-912-7623

m: 202-774-8530

--

Michael M. Ford
Economist
Bureau of Land Management
mmford@blm.gov
w: 202-912-7623
m: 202-774-8530