

Conversation Contents

program meeting topic: CBA and deregulation

Attachments:

/3. program meeting topic: CBA and deregulation/6.1 Amicus Brief EO 13771 eliminate 2 for 1.pdf

"Winthrop, Robert" <rwinthro@blm.gov>

From: "Winthrop, Robert" <rwinthro@blm.gov>
Sent: Thu May 25 2017 09:12:41 GMT-0600 (MDT)
Bill Stevens <bpsteven@blm.gov>, "Dr. Robert Winthrop" <RWinthro@blm.gov>, Hilary Zarin <hzarin@blm.gov>, James C Tichenor <jtichenor@blm.gov>, Jennifer Schein Dobb <jscheindobb@blm.gov>, Jessica Montag <jmontag@blm.gov>, Joshua B Sidon <jsidon@blm.gov>, Keith Brown <kmbrown@blm.gov>, Martin Hensley <mhensley@blm.gov>, Michael D Johnson <mdjohnso@blm.gov>, Mike Ford <mmford@blm.gov>, Rebecca Moore <rmoore@blm.gov>, Scott Rickard <srickard@blm.gov>, Stacey Fritz <SFritz@blm.gov>, Stewart Allen <sdallen@blm.gov>, "Suhr Pierce, Julie A" <jsuhrpierce@blm.gov>, Tessa Teems <tteems@blm.gov>, Tyson J Sackett <tsackett@blm.gov>
To:
Subject: program meeting topic: CBA and deregulation

All:

I would really be interested in a short session on practical aspects of cost-benefit analysis in the context of deregulation. Over the next several years the BLM will likely undertake a number of regulatory actions aimed at modifying existing regulations. Reflecting significant policy disagreements between the Trump and Obama administrations, some of these intended regulatory changes may involve major changes or rollbacks of current requirements.

EO 12866 ("Regulatory Planning and Review"), Sect. 1(b)(6) states:

"Each agency shall assess both the costs and the benefits of the intended regulation and, recognizing that some costs and benefits are difficult to quantify, propose or adopt a regulation only upon a reasoned determination that the benefits of the intended regulation justify its costs."

To put things somewhat simplistically: the original rulemaking should have demonstrated that the estimated benefits of implementing the new regulation exceeded its costs. Presumably a rulemaking to modify an existing regulation must *also* demonstrate that the benefits of the change exceed its costs. We have at least two responsibilities here: to support the policy initiatives of the new departmental and bureau leadership, and to provide analyses that are objective and defensible to the best of our ability. Some discussion of the practical challenges of doing regulatory cost-benefit analysis might be helpful.

Is this a useful topic for the program meeting? Comments by phone or email would be welcome.

Rob

Rob Winthrop
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Decision Support, Planning and NEPA (WO-210)
USDI - Bureau of Land Management

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"Stevens, William" <bpsteven@blm.gov>

From: "Stevens, William" <bpsteven@blm.gov>
Sent: Thu May 25 2017 09:46:43 GMT-0600 (MDT)
To: "Winthrop, Robert" <rwinthro@blm.gov>
Hilary Zarin <hzarin@blm.gov>, James C Tichenor <jtichenor@blm.gov>, Jennifer Schein Dobb <jscheindobb@blm.gov>, Jessica Montag <jmontag@blm.gov>, Joshua B Sidon <jsidon@blm.gov>, Keith Brown <kmbrown@blm.gov>, Martin Hensley <mhensley@blm.gov>,
CC: Michael D Johnson <mdjohnso@blm.gov>, Mike Ford <mmford@blm.gov>, Rebecca Moore <rmoore@blm.gov>, Scott Rickard <srickard@blm.gov>, Stacey Fritz <SFritz@blm.gov>, Stewart Allen <sdallen@blm.gov>, "Suhr Pierce, Julie A" <jsuhrpierce@blm.gov>, Tessa Teems <tteems@blm.gov>, Tyson J Sackett <tsackett@blm.gov>
Subject: Re: program meeting topic: CBA and deregulation

I think it would be very useful.

On Thu, May 25, 2017 at 9:12 AM, Winthrop, Robert <rwinthro@blm.gov> wrote:

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--
Bill Stevens
Outdoor Recreation Planner
Moab Field Office
(435) 259-2101

"Suhr Pierce, Julie" <jsuhrpierce@blm.gov>

From: "Suhr Pierce, Julie" <jsuhrpierce@blm.gov>
Sent: Thu May 25 2017 12:16:57 GMT-0600 (MDT)
To: "Winthrop, Robert" <rwinthro@blm.gov>
Bill Stevens <bpsteven@blm.gov>, Hilary Zarin <hzarin@blm.gov>, James C Tichenor <jtichenor@blm.gov>, Jennifer Schein Dobb <jscheindobb@blm.gov>, Jessica Montag <jmontag@blm.gov>, Joshua B Sidon <jsidon@blm.gov>, Keith Brown <kmbrown@blm.gov>, Martin Hensley <mhensley@blm.gov>
CC: <mdjohnso@blm.gov>, Michael D Johnson <mdjohnso@blm.gov>, Mike Ford <mmford@blm.gov>, Rebecca Moore <rmoore@blm.gov>, Scott Rickard <srickard@blm.gov>, Stacey Fritz <SFritz@blm.gov>, Stewart Allen <sdallen@blm.gov>, Tessa Teems <tteems@blm.gov>, Tyson J Sackett <tsackett@blm.gov>
Subject: Re: program meeting topic: CBA and deregulation

I think it would be good.

Julie

On Thu, May 25, 2017 at 9:12 AM, Winthrop, Robert <rwinthro@blm.gov> wrote:

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440 West 200 South, Suite 500
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jsuhrpierce@blm.gov
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801-597-2335 (cell)

"Ford, Michael" <mmford@blm.gov>

From: "Ford, Michael" <mmford@blm.gov>
Sent: Thu May 25 2017 12:20:26 GMT-0600 (MDT)
To: "Suhr Pierce, Julie" <jsuhrpierce@blm.gov>
"Winthrop, Robert" <rwinthro@blm.gov>, Bill Stevens <bpsteven@blm.gov>, Hilary Zarin <hzarin@blm.gov>, James C Tichenor <jtichenor@blm.gov>, Jennifer Schein Dobb <jscheindobb@blm.gov>, Jessica Montag <jmontag@blm.gov>, Joshua B Sidon <jsidon@blm.gov>, Keith Brown <kmbrown@blm.gov>, Martin Hensley <mhensley@blm.gov>, Michael D Johnson <mdjohnso@blm.gov>, Rebecca Moore <rmoore@blm.gov>, Scott Rickard <srickard@blm.gov>, Stacey Fritz <SFritz@blm.gov>, Stewart Allen <sdallen@blm.gov>, Tessa Teems <tteems@blm.gov>, Tyson J Sackett <tsackett@blm.gov>
CC:
Subject: Re: program meeting topic: CBA and deregulation

Yes, absolutely

On Thu, May 25, 2017 at 2:16 PM, Suhr Pierce, Julie <jsuhrpierce@blm.gov> wrote:
I think it would be good.

Julie

On Thu, May 25, 2017 at 9:12 AM, Winthrop, Robert <rwinthro@blm.gov> wrote:
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Michael M. Ford
Economist
Bureau of Land Management
mmford@blm.gov
w: 202-912-7623
m: 202-774-8530

"Winthrop, Robert" <rwinthro@blm.gov>

From: "Winthrop, Robert" <rwinthro@blm.gov>
Sent: Thu May 25 2017 12:28:24 GMT-0600 (MDT)
To: "Ford, Michael" <mmford@blm.gov>

Subject: Re: program meeting topic: CBA and deregulation

Thanks, Mike.

Rob Winthrop
Senior Social Scientist, Socioeconomics Program
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On Thu, May 25, 2017 at 2:20 PM, Ford, Michael <mmford@blm.gov> wrote:

Yes, absolutely

On Thu, May 25, 2017 at 2:16 PM, Suhr Pierce, Julie <jsuhrpierce@blm.gov> wrote:

I think it would be good.

Julie

On Thu, May 25, 2017 at 9:12 AM, Winthrop, Robert <rwinthro@blm.gov> wrote:

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"Fritz, Stacey" <sfritz@blm.gov>

From: "Fritz, Stacey" <sfritz@blm.gov>
Sent: Thu May 25 2017 12:56:54 GMT-0600 (MDT)
To: "Ford, Michael" <mmford@blm.gov>
"Suhr Pierce, Julie" <jsuhrpierce@blm.gov>, "Winthrop, Robert" <rwinthro@blm.gov>, Bill Stevens <bpsteven@blm.gov>, Hilary Zarin <hzarin@blm.gov>, James C Tichenor <jtichenor@blm.gov>, Jennifer Schein Dobb <jscheindobb@blm.gov>, Jessica Montag <jmontag@blm.gov>, Joshua B Sidon <jsidon@blm.gov>, Keith Brown <kmbrown@blm.gov>, Martin Hensley <mhensley@blm.gov>, Michael D Johnson <mdjohnso@blm.gov>, Rebecca Moore <rmoore@blm.gov>, Scott Rickard <srickard@blm.gov>, Stewart Allen <sdallen@blm.gov>, Tessa Teems <tteems@blm.gov>, Tyson J Sackett <tsackett@blm.gov>
CC:
Subject: Re: program meeting topic: CBA and deregulation
Attachments: Amicus Brief EO 13771 eliminate 2 for 1.pdf

Yes, absolutely.

You may have seen this <https://www.eenews.net/eenewspm/2017/05/24/stories/1060055099>

and it is about EO 13771 (not 12866) but I think it is relevant to 12866 and interesting - attaching the amicus brief here.

On Thu, May 25, 2017 at 10:20 AM, Ford, Michael <mmford@blm.gov> wrote:

Yes, absolutely

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