$H{:}\,\backslash\, Harrison\,\backslash\, Papers\,\backslash\, Index. XV$

Draft

INDEX OF TOZZI PAPERS

VOLUME FIFTHTEEN

VOLUME FIFTHTEEN

<u>Volume</u>	Document	Pages	Notes
XV	1	1-3	Draft memorandum for Charles Schultze from Harrison Wellford, Dated: 8/10/77, Subj: CEA's proposed Economic Impact Analysis Program.
XV	2	1	OMB note from Jerry Shipley to Jim Tozzi. Dated: 8/5/77, Subj. Stan wants to know about the requirement for Economic Impact Analyses contained in the Clean Air Act.
XV	3	1-2	Letter from Harrison Wellford to Bert Lance, Dir. OMB Dated: 8/3/77, Subj: Proposed Procedures for Economic Impact Analysis. Wellford makes recommendations for the meeting.
XV	4	1-8	Page 1 Memorandum for Distribution from Charlie Schultze, CEA Dated: 8/1/77, Subj: Economic Impact Analysis Program. Refers to attached memo.
			Page 2-8 Implementation of and Economic Impact Analysis Program from Council of Economic Advisers. Page 8 includes a milestone chart that shows the timing.
XV	5	1-9	Page 1 Letter from W. H. Close, Director. Office of Noise Abatement Dept. of Transportation to Dir. Standards &

Regulations Division Office of Noise Abatement & Control, EPA. Dated: 12/9/77, Subj: Close Submits comments reflecting the views of the Dept. of Transportation regarding the proposed bus noise regulation.

Page 2-9 -- DOT comments on EPA Proposed Bus Noise Emission Standards.

XV	6	1-3	Letters from Lawrence B. Glick, Solicitor, Office of General Counsel to William LM. Nichols, General Counsel, OMB. Dated: 11/4/77, Subj. Glick responds to Nichol's letter of 10/17/77, addressed to John A. Boggs, Staff Director of the U.S. Commission on Civil Rights.
XV	7	1-4	Letter from Douglas M. Costle, Admin. EPA to Civilian M. Nicholas, Gen. Counsel, OMB dated: 11/16/77, Subj: reply to Nicholas requ3est for comments on the Proposed E.O. "Improving Regulatory Practices" Costle has general negatives comments.
XV	8	1	Memorandum from Joyce J. Walker, OMB to Division Chiefs DAted: 11/17/77, Subj: FY 1979 Reimbursable Charges. Distribution costs fro publications.
XV	9	1	Regulators Imperiling Our American System' by Flint Janeway. <u>Washington Star</u> . Dated 1/1/78.

<u>Volume</u>	Document	Pages	Notes
XV	10	1	'Regulatiors Cost Dow \$186 million' Expense of Compliance Rises 27% in year, firm says. by stephan M. Aug. Washington Star, Dated:
XV	11	1-8	ABA Quaerterly Newsletter of the Standing Committee on Environmental Law Dated: Winter 1978 Page 1-2 'Regulation and Monitoring of Toxic and Hazsardous Chemicals Under the Clean Water Act'
			Page 3 Ruby Lake: 'A Dangerous President in National Wildlife Reguge Management.'
			Page 4 ABA's Regulatory Reform Commission Debates White House Review Function.
			Page 5-8 j'EPA Noise Enforcement Contract Arssm?????.
XV	12	1	'Surge in Environmental Regs' Government Executive Dated: November 1977. Page 12.
XV	13	1	Letter from James D. Johnston, Dir. Government Relations. GeneralMotors to Herbert Harris, Jr. Asst. Director, Congressional Relations, OMB Dated: 3/7/78, Subj: inter-agency coordination on proposal regulations. OMB's rule in interagency coordination.

<u>Volume</u>	Document	Pages	Notes
XV	14	1-4	Release from the Alexander Company to Environmental INformation Center. Dated:, Octrober 1977. Subj: 647 New/Amended Statutes. State Environment - Laws/Regs. Risc 30 percent in 18 months; new land use emphasis cital.
XV	15	1-2	'Statefiche Subscription Options & Prices' Dated 1977-1978.
XV	16	1	Letter from Karen Ziegler, Dir. Special Projects Environment Information Center, Ins. to Jim Tozzi, CHief Environment Branch, OMB Dated: 12/2/77 Subj: 'Thank you for inquiring about Statefiche EIC's michrfiche collection of state environmental laws & regulation.'
XV	17	1-2	ABA Report to the House of Delegates by t;he Commission on Law and the Economy - Recommendation: Support of a Review Process Incorporating Viewspoints of all Interested Agencies During the Development of Major Regulations. Dated:
XV	18	1	ABA Report to the House of Delegates by the Commission on Law & the Economy: Recommendations: Support of the proposed Executive Order, "Improving Government REgulations" Dated:

<u>Volume</u>	<u>Document</u>	Pages	Notes
XV	19	1-6	Page 1 Memorandum from Stan Morris, OMB to Harrison Wellford, Bo Cutler, Eliot Cutler, Dale McOmber, Jim Frey. Dated: 5/4/77, Subj: EPG Procedures for Economic Impact Analysis.
			Pages 2-6 <u>Regulatory Analysis and Interagency Coordination</u> .
			OMB's possible role in these revised procedures for agency review.
XV	20	1-26	Pages 1-4 Memorandum from Stan Morris, OMB to Harrison Wellford, OMB Dated: 2/10/77, Subj: <u>Procedural Regulatory Reform</u> .
			Pages 5-12 Reform of the Regulatory Process.
			Pages 13-23 The Interagency Review Process.
			Pages 24-26 Regulatory Impact Analysis.

Volume	Document	Pages	Notes
XV	21	1-11	Page 1 Memorandum to Agency Participants from Stan Morris and Jim Tozzi. Dated: 3/15/77, Subj: Summary of Meetings on Improving Regulatory Procedures.
			Pages 2-8 <u>Summary Meetings on</u> <u>Improving Regulatory Procedures</u> .
			Pages 9-10 <u>Attendees</u>
			Page 11Improving Regulatory Procedures Meeting - March 15, 1977.
XV	22	6	Note from Nina Cornell, CEA to the EPG Subcommittee on Economic Impact Analysis. Dated: 5/2/77, Subj: refers to attached analysis.
			Page 2-6 Memorandum to EPG from the EPG Subcommittee on Economic Impact Analysis. Dated: 5/2/77, Subj: Implementation of an Economic Impact Analysis Program.
XV	23	1-3	Memorandum from Li Bosworth from Stan Morris, OMB Dated: 3/8/77, Subj. Your Draft Memorandum of March 7, 1977.

<u>Volume</u>	<u>Document</u>	<u>Pages</u>	Notes
XV	24	1-6	Draft for Comment: To: Economic Policy Group From: CEA Dated: 3/7/77 Subj: Reform of Regulatory Practices Implementation Procedures.
XV	25	1-2	Letter from Bill Pedersen, EPA to Jim Tozzi, OMB Dated: 4/5/77, Subj: Regulatory Reform. Pedersen comments on proposed reforms.
XV	26	1-7	Pages 1-2 Memorandum for Rick Hutchenson from Harrison Wellford. Dated: 9/26/77. Subj: Economic Impact Analysis.
			Pages 3-7 Memorandum for the President from charlie Schultze Dated: 9/20/77, Subj: Economic Impact Analysis. Memo describes the program developed by an interagency task force in response to your directive, and seeks your approval to implement it immediately.
XV	27	1-3	(Identical to Vol. XV, Doc. 6, Pages 8-10).

<u>Volume</u>	Document	Pages	Notes
XV	28	1-4	A Staff Report to The Executive Committee of the Regulatory Analysis Review Group
			Regulation Item: Regulation to Prevent Significant Deterioration.
XV	29	1-4	Memo from Rob Robson to Eliot Cutler Dated: 4/6/78, Subj: Review of EPA's Regulations to Prevent Significant Deterioration. (Same as Vol. XV, 28, 1-4)
XV	30	1-7	Page 1 Letter from Timothy Atkeson, Steptoe and Johnson to Jim Tozzi, OMB. Dated: 11/3/77, Subj: Refers to attached letter regarding wood preserving.
			Pages 2-3 Letter from Timothy Atkeson, Steptoe & Johnson, to Dr. Eula Bingham, Asst. Sec. of Labor for OSH. Dated: 11/3/77, Subj. Atkeson writes on behalf of the American Wood Preservers Institute.
			Pages 4-5 Letter from Timothy Atkeson, Steptoe & Johnson to Douglas Costle, Admin, EPA, Dated: 11/3/77, Subj: American Wood Preserving Institute and a discussion which Eula Bingham had with EPA.

<u>Volume</u>	<u>Document</u>	<u>Pages</u>	Notes
XV	31	1-4	Page 1 Letter from Kathryne Bernick, Asst. Staff Director, ABA to Jim Tozzi, OMB. Dated: 8/5/77, Subj: Bernick encloses a copy of her discussion with Tozzi regarding the QLR.
			Pages 2-4 Interview with Jim Tozzi, Branch Chief, Environment Branch. NRD. OMB. Dated: 7/18/77, Subj: Interagency Review Process.
XV	32	1-5	Page 1 Letter from Earl Darrah, Asst. Dir., Administration & Planning Energy & Minerals Division, GAO. to Kathryne Bernick, Asst. Staff Director, ABA. Dated: 8/15/77, Subj. Darrah refers to interview, attached.
			Page 2 Letter from Kathryne Bernick, Asst. Staff Director, ABA to Earl Darrah, Asst. Dir. Administration & Planning. GAO Dated: 8/5/77, Subj: interview with Darrah.
			Pages 3-5 Earl Darrah, Asst. Dir., Administration and Planning. GAO, Dated: 6/24/77, Subj: OMB Interagency Review Process.

<u>Volume</u>	Document	Pages	Notes
XV	33	1	Letter from Donald L. Snow, Chairman, Committee on Concepts for Developing Environmental Quality Standards, AAEE to Jim Tozzi, OMB. Dated: 6/22/77, Subj: Snow thanks Tozzi for letter on QLR.
XV	34	1-17	Page 1 OMB Route Slip from Jim Tozzi to Mr. Crabill and Mr. Morris. Dated: Subj: Attached EPA proposed testimony on S. 600.
			Pages 2-9 Richard D. Redenius, Acting Assistant Administrator for Planning & Management, EPA before the Subcommittee on Intergovernmental Relations Committee on Governmental Affairs. U.S. Senate Dated: 6/8/77 (handwritten notes in margins) Pages 10-17 same as Pages 2-9.
XV	35	1-7	Statement of W. Harrison Wellford, Executive Assoc. Director of the Office of Management & Budget on the Regulatory Reform Act of 1977 before the Senate Subcommittee on Intergovernmental Affairs. Dated: 5/25/77.

Volume	Document	Pages	Notes
XV	36	1-3	Pages 1-2 Letter from Donald L. Snow, Chairman, Committee on Concepts for Developing Environmental Quality Standards, AAEE to Jim Tozzi, OMB. Dated: 5/23/77, Subj: Snow asks Tozzi for his help in learning more about the Quality of Life Review.
			Page 3 Letter from Jim Tozzi, OMB to Donald L. Snow, Chairman, Committee on Concepts for Developing Environmental Quality Standards, AAGE. Dated:, Subj: Tozzi encloses material which Snow requested in May 23, 1977 letter to Tozzi.
XV	37	1-2	Letter from Thomas L. Kimball, Exec. V.P., National Wildlife Federation to the President, Dated: 5/27/77, Subj: NWF's concern about the proposed Economic Analysis Program. The Program will reinstate the QLR.
XV	38	1-2	Page 1 'Examples of Agencies Suing each other' - (Handwritten note from Tozzi) Page 2 Environmental Defense Funds EPA - U.S. Court of Appeals District of Columbia Circuit. (FERC 1575)

<u>Volume</u>	<u>Document</u>	Pages	Notes
XV	39	1-18	"Coping with Technology through the Legal Process" Address by David L. Bazelon, Chief Judge U.S. Court of Appeals for the District of Columbia Circuit. Conference on United States Energy Policy Atomic Industrial Forum, Inc. Dated: 1/10/77.
XV	40	1-2	Letter from George C. Freeman, Jr. Hunton & Williams to John at the Justice Dept. Dated: 2/2/77, Subj: Quality of Life Review and EPA desire to discontinue 'need for reinstitution of the interagency review process on an interim basis"
XV	41	1-3	'EPA Regulation Since 1/25/77' (Date, Regulation, Type, External Review) last date is March 3, 1977.
XV	42	1	Memo from S. Lazarus to Jim Tozzi, OMB, Dated: 11/3/77, Subj: Your memo of Oct. 31. Judge Leventhal's views in Presidential involvement in agency rulemaking.

<u>Volume</u>	Document	Pages	Notes
XV	43	1-5	Quality of Life Review - no date given discuss Reform Act of 1976 H.R. 12048 - the bill, ultimately defeated, sought to give each House a veto power over all proposed agency regulations. Mr. Levitas speaks during floor debate. This document appears to be Judge Leventhal's comments on QLR. (Check with Tozzi)
XV	44	1-3	Page 1 Reference Slip (Dept. of Agriculture) from Glen H. Loomis, Coordinator for Land, Air, Water and Solid Waste. Office of Environmental Quality Activities, SEC. to Jim Tozzi, OMB. Dated: 2/1/77, Subj:
			Page 2 Quality of Life Review - Past Experience, - Need for Coordination, Legislation as an Alternate Device what is needed for the future.
XV	45	1-6	Page 1 Routing and Transmittal Slip from G. William Frich to Jim Tozzi, OMB, Dated: 1/31/77, Subj: see attached.
			Pages 2-6 It seems that Frisch gives his opinion on formal vs. informal rulemaking.

<u>Volume</u>	Document	Pages	Notes
XV	46	1-25	Page 1-2 Memorandum for members of the Commission from Lloyd N. Cutler. Dated: 1/4/78, Subj: revised set of recommendations of the Committee on Accountability.
			Pages 3-13 ABA Report to the House of Delegates by the Commission on Land and the Economy Rec. #1 Support for Limited Presidential Authority to expedite, modify vs. reverse decisions of Regulatory Agencies on Critical Policy Issues.
			Page 14-19 Recommendation #2 - Support for Presidential Authority to Initiate and Take Part in Pre-Decisional Agency and Interagency Review of Major Regulatory Actions.
			Pages 20-25 Recommendation #3 <u>Disposal of</u> the Present Form of Legislative Veto over Presidential and Agency Actions; Support for an Appropriate and Constitutional Form of Congressional Review of Certain Presidential Actions under-Delegated Powers.
XV	47	1-23	'Summary and Analysis of Public Comments' - by Wayne G. Granquist, - by Wayne G. Granquist, Assoc. Dir. for Management and Regulatory Policy, OMB.

Volume	Document	Pages	Notes
XV	48	1-79	National Research Council, Commission on Natural Resources Environmental Studies Branch - Meeting Record from Resolution of Scientific Issues and on the Judicial Process: Ethyl Corp. vs. EPA Dated: 10/21/77.
XV	49	1-7	(Handwritten notes from Jim Tozzi, see Tozzi for details)
XV	50	1	Article 'Proposal to Streamline Regulatory Process to Unuciled' Washington Post, Dated:

<u>Volume</u>	<u>Document</u>	Pages	Notes
XV	51	1-4	Page 1 'The Coal Conversion Module' The Wall Street Journal Dated: 7/28/77.
			Page 2 'The Coal Conversion Module' The Wall Street Journal Dated: 7/28/77 - by John Quarles.
			Page 3-4 ' <u>The PageWork Weed</u> - Federal Regulatory Red Tape Keep Growing Despite Carter's Rhetoric About Cutting it Back - <u>The Wall Street Journal</u> , Dated: 7/27/77.
XV	52	1	'Stricter Economic Impact Review Plan Set' Washington Star Dated: 3/18/77.
XV	53	1	'3 Targets Set as Inflation Fight Opens' Washington Post, Dated: 4/20/78.

<u>Volume</u>	Document	<u>Pages</u>	Notes
XV	54	1-10	Page 1-5 From the Office of the Press Secretary Executive Order Improving Government Regulations, Dated: 3/23/78.
			Pages 6-7 Statement by the President, Dated 3/23/78.
			Page 8 Fact Sheet Dated: 3/23/78.
			Page 9-10 Text of the President's Letter.
XV	55	1-5	Page 1 Impact of the Administrator of the Occupational Safety & Health Act on Small Business A report of the Subcommittee on Energy, Environment, Safety & Research of the Committee on Small Business. 10/26/77. Pages, 33, 34, 35, 50.
XV	56	1-15	Environmental Protection Agency Major Issues Agenda from James R. Janis, Act. Dir. Standards & Regulations Evaluation Division. Environment Reporter, 1977. p. 623-637.
XV	57	1-15	S. 600 In the Senate: A Bill "Regulatory Reform Act of 1977" Mr. Percy introduced the Bill.

<u>Volume</u>	Document	Pages	Notes
XV	58	1	'CEA Draft Economic Guidelines World make Agencies Consider Costs' <u>Environment</u> <u>Reporter</u> , p. 581.
XV	59	1-5	'Recommendations of the Administrative Conference of the Untied States' <u>Federal Register</u> , Vol. 41 No. 252-Thursday, 12/30/76. p. 56767-56771 by Richard Berg,. Exec. Secretary.
XV	60	1-2	Congressional Record - Senate. 1/20/77. (Check original)
XV	61	1-5	Special Report. 'Office of Management and Budget Plays Critical Part in Environmental Policymaking, faces little External Review 1 Environment Reporter - p., 693-697.
XV	62	1-2	'ERPA En?? 'Quality of Life' Review Conducted by OMB on Agency's Regulations. p. 1443 - 1444. Environment Reporter.
XV	63	1	(Handwritten note from Jim Tozzi, see Tozzi for details)