

**The original documents are located in Box 4, folder “Environmental Policy Study”
of the Norman Ross Files, 1974-75
at the Gerald R. Ford Presidential Library.**

Copyright Notice

The copyright law of the United States (Title 17, United States Code) governs the making of photocopies or other reproductions of copyrighted material. Norman E. Ross, Jr. donated to the United States of America his copyrights in all of his unpublished writings in National Archives collections. Works prepared by U.S. Government employees as part of their official duties are in the public domain. The copyrights to materials written by other individuals or organizations are presumed to remain with them. If you think any of the information displayed in the PDF is subject to a valid copyright claim, please contact the Gerald R. Ford Presidential Library.

May 21, 1975

MEMORANDUM FOR THE PRESIDENT

FROM: JAMES M. CANNON

SUBJECT: Domestic Council Study of U.S.
Environmental Policy

PURPOSE AND OBJECTIVE OF STUDY:

This study will review the progress of existing Federal programs on air and water pollution and land use, with special reference to the impact of these programs on the consumer and on the economy as a whole, their consequences for selected major industries and their effect on other national and State priorities, including public health, transportation, energy and economic development. It is our objective to spell out in detail how we may achieve a clean and healthy environment consistent with our critically important commitments to a healthy economy, a balanced transportation system, adequate housing and adequate energy supplies.

PARTICIPATION IN THE ENVIRONMENTAL STUDY GROUP

The following Agencies and Departments will be represented on the review group conducting this study:

Environmental Protection Admin.	Dept. of Transportation
Council on Environmental Quality	Council of Economic Advisers
Office of Management and Budget	Economic Policy Board
Department of the Interior	Federal Energy Administration
Department of Agriculture	Energy and Research Development
Department of the Treasury	Administration
Department of Commerce	Nuclear Regulatory Commission
Department of Labor	Office of Consumer Affairs, DHEW
Department of Housing and Urban Development	Council on Wage and Price Stability

TIMING FOR COMPLETION OF THIS STUDY

This review group should be prepared with preliminary findings and recommendations by October 1, 1975, and out with a final report to the President by December 1, 1975.

THE WHITE HOUSE
WASHINGTON

April 19, 1975

ADMINISTRATIVELY CONFIDENTIAL

MEMORANDUM FOR:

JIM CANNON

FROM:

JERRY H. JONES

SUBJECT:

Domestic Council Study of
U.S. Environmental Policy

Your memorandum to the President of April 17 on the above subject has been reviewed and your recommendation -- that the Domestic Council undertake a study of domestic environmental programs and policies, to determine their effectiveness, consistency with other national objectives, direct and indirect costs, and impact on the creation of new jobs and on productivity -- was approved.

Please follow-up with the appropriate action.

Thank you.

cc: Don Rumsfeld

Stuval

file



THE WHITE HOUSE
WASHINGTON

ACTION

April 17, 1975

MEMORANDUM FOR THE PRESIDENT

FROM : JIM CANNON

SUBJECT : Domestic Council Study of
U.S. Environmental Policy

I recommend that the Domestic Council undertake a study of domestic environmental programs and policies, to determine their effectiveness, consistency with other national objectives, direct and indirect costs, and impact on the creation of new jobs and on productivity.

SUBJECT OF STUDY

The study would review existing Federal programs on air and water pollution and land use, including their impact on the consumer and on the economy as a whole, their consequences for specific major industries, and their interplay with State and local priorities.

OBJECTIVE

The objectives of the study are:

- To produce a thorough-going analysis of Federal, State and local environmental programs in operation;
- to assess the efficiency of current environmental programs in meeting national objectives in air and water quality and sound land use, to see if they need improvement; and,
- if warranted by the conclusions of the study, to formulate for your consideration a series of policy options for modifying existing programs and policies to better serve the national interest.



ORGANIZATION

The review group for this study should include appropriate representatives of the following Departments and Agencies:

Treasury	CEA
Interior	EPA
Agriculture	CEQ
Commerce	EPB
Labor	FEA
HUD	ERDA
Transportation	Nuclear Regulatory Commission
OMB	Office of Consumer Affairs, HEW
	Council on Wage and Price Stability

RECOMMENDATION

The Vice President, Secretary Morton, Phil Buchen, Max Friedersdorf, Alan Greenspan, Bob Hartmann, Jim Lynn, Jack Marsh, Russ Peterson, Bill Seidman, Russ Train, and Frank Zarb have reviewed this memorandum and recommend approval.

DECISION

☒ Approve ☐ Disapprove



Draft

BROAD STUDY OF THE U.S. ENVIRONMENT

STUDY SUBJECT

I recommend that the Domestic Council undertake a ~~review of the status~~ ^{study} of selected Federal environmental programs with two broad areas of emphasis: in the pollution control area on air quality, water quality, and solid waste, and in the natural resources area on the capability of public lands to meet conflicting demands for renewable resources, energy and minerals, recreation, watershed protection, and wildlife habitat.)

STUDY OBJECTIVE

The objectives of the study are to formulate for your consideration, a policy position and action program on
1) the appropriate future Federal role in pollution abatement and control and 2) the appropriate balance between competing demands upon the public lands.

Precise objectives for the pollution control phase are:

1. assess the present status of program implementation and effectiveness.
2. determine current and projected costs of implementation for public and private sectors.
3. review status of knowledge on benefits of pollution abatement: protection of health and ecosystems; conservation of resources.



4. develop proposals arrived at balancing the benefits of pollution control with other important national objectives: modifications of air and water quality programs; Federal incentives for resource recovery.

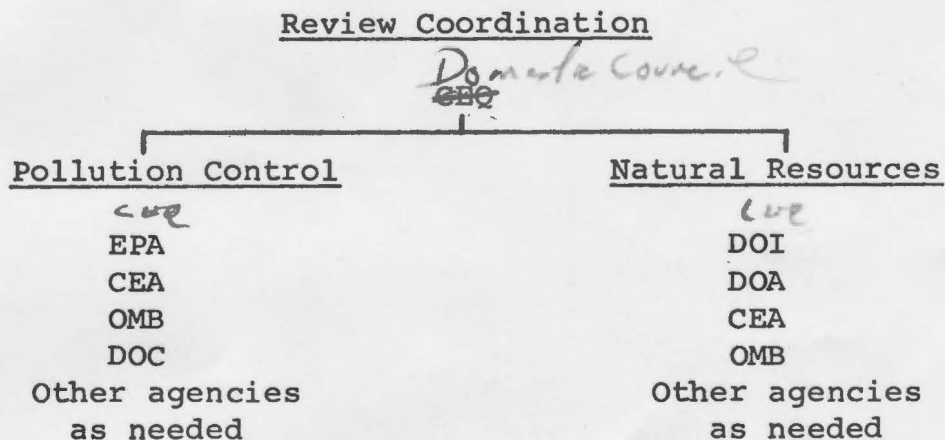
Precise objectives for the natural resources phase are:

1. describe public lands natural resources: minerals, timber, rangeland, wilderness, etc.
2. determine current and projected demand for goods and services from public lands: energy and mining, forest products, recreation, etc.
3. assess capacity of public lands to meet demands for goods and services.
4. identify important conflicts among alternatives demands upon public lands
5. propose actions to resolve conflicts and/or to increase capacity of public lands to meet needs.



ORGANIZATION

The review groups should be organized as shown below and consist of appropriate agency representatives:



TIMETABLE

The review group should report to the Council with a study plan within two weeks, detailed outline within six weeks, an interim report ~~in~~ three months later, and a final report three months after that; total lapsed time from initiation through final report would be approximately eight months.



BROAD STUDY OF THE U. S. ENVIRONMENTSTUDY SUBJECT

I recommend that the Domestic Council undertake a study of selected Federal environmental programs with two broad areas of emphasis: in the pollution control area on air quality, water quality, and solid waste, and in the natural resources area on the capability of public lands to meet conflicting demands for renewable resources, energy and minerals, recreation, watershed protection, and wildlife habitat.

STUDY OBJECTIVE

The objectives of the study are to formulate for your consideration, a policy position and action program on (1) the appropriate future Federal role in pollution abatement and control; and (2) the appropriate balance between competing demands upon the public lands.

Precise objectives for the pollution control phase are:

1. Assess the present status of program implementation and effectiveness.
2. Determine current and project costs of implementation for public and private sectors.
3. Review status of knowledge on benefits of pollution abatement: protection of health and ecosystems; conservation of resources.
4. Develop proposals arrived at balancing the benefits of pollution control with other important national objectives: modifications of air and water quality programs; Federal incentives for resource recovery.

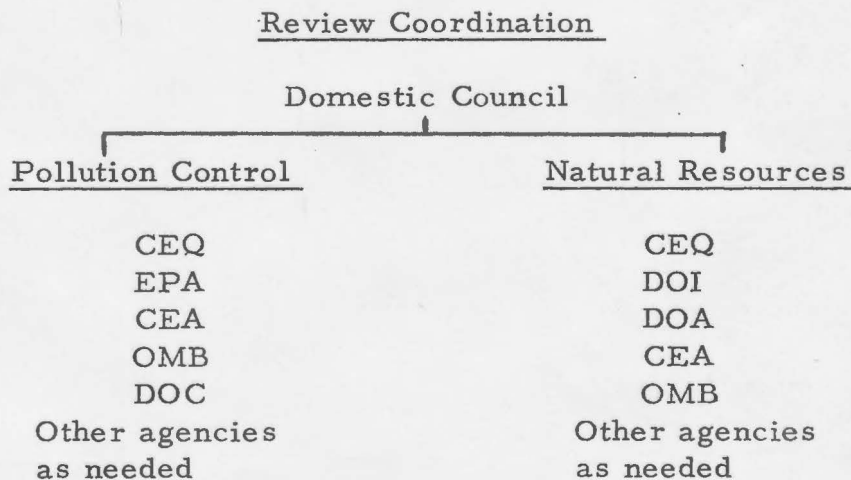


Precise objectives for the natural resources phase are:

1. Describe public lands natural resources: minerals, timber, rangeland, wilderness, etc.
2. Determine current and projected demand for goods and services from public lands: energy and mining, forest products, recreation, etc.
3. Assess capacity of public lands to meet demands for goods and services.
4. Identify important conflicts among alternative demands upon public lands.
5. Propose actions to resolve conflicts and/or to increase capacity of public lands to meet needs.

ORGANIZATION

The review groups should be organized as shown below and consist of appropriate agency representatives:



TIMETABLE

The review group should report to the Domestic Council with a study plan within two weeks, detailed outline within six weeks, an interim report three months later, and a final report three months after that. The total lapsed time from initiation through final report would be approximately eight months.



THE WHITE HOUSE

WASHINGTON

March 19, 1975

TO: DON WALDON

FROM: NORM ROSS

The attached is for your review,
as per our conversation.



D R A F T

BROAD STUDY OF THE U. S. ENVIRONMENT

STUDY SUBJECT

I have considered recommending a study in the natural resources area on the capability of public lands to meet conflicting demands for renewable resources, energy and minerals, recreation, watershed protection, and wildlife habitat.

STUDY OBJECTIVE

The objectives of the study are to formulate for your consideration a policy position and action program on (1) the appropriate future Federal role in pollution abatement and control; and (2) the appropriate balance between competing demands upon the public lands.

Precise objectives for the natural resources phase are:

1. Describe public lands natural resources: minerals, timber, rangeland, wilderness, etc.
2. Determine current and projected demand for goods and services from public lands: energy and mining, forest products, recreation, etc.
3. Assess capacity of public lands to meet demands for goods and services.
4. Identify important conflicts among alternative demands upon public lands.
5. Propose actions to resolve conflicts and/or to increase capacity of public lands to meet needs.

Please let me have your comments or any additions as to how you would structure this study. I would appreciate your response by cob Thursday, March 20 (by telephone will be fine).



3-19-75

THE WHITE HOUSE

WASHINGTON

May 20, 1975

MEMORANDUM TO: DOUG COSTLE
FROM: DICK DUNHAM *Dick*
SUBJECT: Domestic Council Meeting --
Review Group Study on the Environment

The President has scheduled a Domestic Council meeting on Friday at 2 p.m.

One of the items on the agenda will likely be the announcement by him or the Vice President of the review groups that have already been established and approved by the President.

I would appreciate it if you would prepare a one-page memorandum for either the President's or the Vice President's use which includes at least the following items:

- 1) The announcement of the members of the review group.
- 2) A paragraph on the basic mission and objectives of the review group.
- 3) The timing for completion of the various steps in the tasks.

I would appreciate it if I could have this by the close of business Wednesday.

cc: Jim Cannon



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

Office of the
Assistant Administrator for Planning and Management

5/21

To: Mr. Castle

From: Al Alon



Environmental Study

The study of environmental programs would focus on the following three areas:

- (1) Assess and evaluate the progress and problems of environmental programs. This would include analysis of improvements in air and water quality, problems being encountered, and alternative solutions.
- (2) Assess and evaluate the interrelationship of environmental programs with the achievement of other important national objectives, such as:
 - transportation
 - housing
 - energy
 - economic growth
 - public health
- (3) Assess and evaluate institutional arrangements to carry out environmental programs at the Federal, State and local levels of Government and in the private sector. The study would analyze whether the current institutional arrangements are appropriate and analyze specifically whether greater delegation of environmental programs to State and local Governments is possible and what steps would be necessary to accomplish such an objective.



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

5/23/75

FROM: *Paul* PAUL A. BRANDS
DEPUTY ASSISTANT ADMINISTRATOR
FOR PLANNING AND EVALUATION

TO: DOUG COSTLE
ASSOCIATE DIRECTOR
DOMESTIC COUNCIL

Attached is the Study Prospectus
as per our conversation.



DOMESTIC COUNCIL STUDY OF U. S. ENVIRONMENTAL POLICY

STUDY PROSPECTUS

BACKGROUND

A number of concerns and issues have been raised with respect to our Nation's ability to move forward toward achieving our environmental goals at the current pace while still accomplishing other national goals such as a strong economy and progress towards energy independence. Though many studies (both interagency and by single agencies) have been done or are currently underway which assess some of the inherent impacts and tradeoffs among these national goals, there remains a need to address this complex issue in a more comprehensive direct manner. A Domestic Council directed study, with substantial input from the relevant Agencies and Departments, can bring to bear the resources needed to properly address this issue.

STUDY OBJECTIVE

This study will assess the progress of existing Federal programs on air and water pollution and land use with special reference to the impact of these programs on the consumer and on the economy as a whole, their consequences for selected major industries, and their effect on other national and State priorities, including public health, transportation, energy and economic development. The objective will be to spell out how we may achieve a clean and healthy environment consistent with our critically important commitments to a healthy economy, a balanced transportation system, adequate housing, and adequate energy supplies.

METHODOLOGY

This study will focus on the following three areas:

(1) Assess and evaluate the progress and problems of environmental programs. This would include analysis of improvements in air and water quality, problems being encountered, and alternative solutions. The study group will look at trend data on air and water quality and associated



health and aquatic improvements. In addition, the study will assess where major environmental cleanup problems are occurring, will review their causes and impacts, and will present possible actions which might alleviate these problem areas.

(2) Assess and evaluate the interrelationship of environmental programs with the achievement of other important national objectives, such as those related to:

- energy
- economic growth
- transportation
- housing
- public health

In addressing these issues, the study group will incorporate the major interagency study efforts (a series of EPA-led studies of the economic impacts of environmental programs on major industries and the National economy) which are already underway, as well as other study efforts which are already underway or completed. This assessment will concentrate on impacts on the basic capital-intensive materials-producing industries (steel, paper, utilities, nonferrous metals, etc.) which are most heavily impacted by pollution control and on macroeconomic effects. Of particular interest will be effects on prices, capital expenditures, production, employment, plant closings, and balance of payments. Much is known or currently being studied; however, this information must be drawn together and carefully assessed.

(3) Assess and evaluate institutional arrangements to carry out environmental programs at the Federal, State and local levels of Government and in the private sector. The study would analyze whether the current institutional arrangements are appropriate and analyze specifically whether greater delegation of environmental programs to State and local governments is possible and what steps would be necessary to accomplish such an objective. More specifically, the study should look at the likely effectiveness of program delegations capability and willingness of States to accept delegations, utility of grants in accomplishing program objectives, organizational constraints and possible alternative arrangements which could enhance effectiveness and/or reduce costs.



PARTICIPATION IN STUDY

The study will be directed by the Domestic Council with representations from the following Agencies and Departments:

Environmental Protection Agency
Council on Environmental Quality
Office of Management and Budget
Department of Interior
Department of Agriculture
Department of Treasury
Department of Commerce
Department of Labor
Housing and Urban Development
Council on Wage and Price Stability
Department of Transportation
Council of Economic Advisors
Economic Policy Board
Federal Energy Administration
Energy and Research Development Administration
Nuclear Regulatory Commission
Office of Consumer Affairs (DHEW)

TIMING FOR COMPLETION OF STUDY

This review group should be prepared with preliminary findings and recommendations by November 1, 1975, and out with a final report to the President by December 1, 1975.

DOMESTIC COUNCIL STUDY OF U. S. ENVIRONMENTAL POLICY

STUDY PROSPECTUS

BACKGROUND

A number of concerns and issues have been raised with respect to our Nation's ability to move forward toward achieving our environmental goals at the current pace while still accomplishing other national goals such as a strong economy and progress towards energy independence. Though many studies (both interagency and by single agencies) have been done or are currently underway which assess some of the inherent impacts and tradeoffs among these national goals, there remains a need to address this complex issue in a more comprehensive direct manner. A Domestic Council directed study, with substantial input from the relevant Agencies and Departments, can bring to bear the resources needed to properly address this issue.

STUDY OBJECTIVE

This study will assess the progress of existing Federal programs on air and water pollution and land use with special reference to the impact of these programs on the consumer and on the economy as a whole, their consequences for selected major industries, and their effect on other national and State priorities, including public health, transportation, energy and economic development. The objective will be to spell out how we may achieve a clean and healthy environment consistent with our critically important commitments to a healthy economy, a balanced transportation system, adequate housing, and adequate energy supplies.

METHODOLOGY

This study will focus on the following three areas:

- (1) Assess and evaluate the progress and problems of environmental programs. This would include analysis of improvements in air and water quality, problems being encountered, and alternative solutions. The study group will look at trend data on air and water quality and associated



health and aquatic improvements. In addition, the study will assess where major environmental cleanup problems are occurring, will review their causes and impacts, and will present possible actions which might alleviate these problem areas.

(2) Assess and evaluate the interrelationship of environmental programs with the achievement of other important national objectives, such as those related to:

- energy
- economic growth
- transportation
- housing
- public health

In addressing these issues, the study group will incorporate the major interagency study efforts (a series of EPA-led studies of the economic impacts of environmental programs on major industries and the National economy) which are already underway, as well as other study efforts which are already underway or completed. This assessment will concentrate on impacts on the basic capital-intensive materials-producing industries (steel, paper, utilities, nonferrous metals, etc.) which are most heavily impacted by pollution control and on macroeconomic effects. Of particular interest will be effects on prices, capital expenditures, production, employment, plant closings, and balance of payments. Much is known or currently being studied; however, this information must be drawn together and carefully assessed.

(3) Assess and evaluate institutional arrangements to carry out environmental programs at the Federal, State and local levels of Government and in the private sector. The study would analyze whether the current institutional arrangements are appropriate and analyze specifically whether greater delegation of environmental programs to State and local governments is possible and what steps would be necessary to accomplish such an objective. More specifically, the study should look at the likely effectiveness of program delegations capability and willingness of States to accept delegations, utility of grants in accomplishing program objectives, organizational constraints and possible alternative arrangements which could enhance effectiveness and/or reduce costs.



PARTICIPATION IN STUDY

The study will be directed by the Domestic Council. with representations from the following Agencies and Departments:

Environmental Protection Agency
Council on Environmental Quality
Office of Management and Budget
Department of Interior
Department of Agriculture
Department of Treasury
Department of Commerce
Department of Labor
Housing and Urban Development
Council on Wage and Price Stability
Department of Transportation
Council of Economic Advisors
Economic Policy Board
Federal Energy Administration
Energy and Research Development Administration
Nuclear Regulatory Commission
Office of Consumer Affairs (DHEW)

TIMING FOR COMPLETION OF STUDY

This review group should be prepared with preliminary findings and recommendations by November 1, 1975, and out with a final report to the President by December 1, 1975.



March 21, 1975

MEMORANDUM FOR: JAMES M. CANNON
FROM: NORM ROSS
SUBJECT: Proposed Domestic Council Study

Pursuant to your request, I have drafted a proposal that the Domestic Council undertake a broad study of the United States environment.

In addition to selecting those areas which I believe require further study, I have made an attempt to include areas in which studies and data collection activities are currently underway in the Departments and Agencies. A number of individual Agency activities should be properly coordinated to address broad environmental policy issues.

Attachment

cc:
Mr. Dunham
Mr. Cavanaugh
Mr. Dunal

NRoss/pt 3-21-75



D R A F T

BROAD STUDY OF THE U. S. ENVIRONMENT

STUDY SUBJECT

I recommend that the Domestic Council undertake a study of selected Federal environmental programs with two broad areas of emphasis: in the pollution control area on air quality, water quality, and solid waste, and in the natural resources area on the capability of public lands to meet conflicting demands for renewable resources, energy and minerals, recreation, watershed protection, and wildlife habitat.

STUDY OBJECTIVE

The objectives of the study are to formulate for your consideration, a policy position and action program on (1) the appropriate future Federal role in pollution abatement and control; and (2) the appropriate balance between competing demands upon the public lands.

Precise objectives for the pollution control phase are:

1. Assess the present status of program implementation and effectiveness.
2. Determine current and project costs of implementation for public and private sectors.
3. Review status of knowledge on benefits of pollution abatement: protection of health and ecosystems; conservation of resources.
4. Develop proposals arrived at balancing the benefits of pollution control with other important national objectives: modifications of air and water quality programs; Federal incentives for resource recovery.

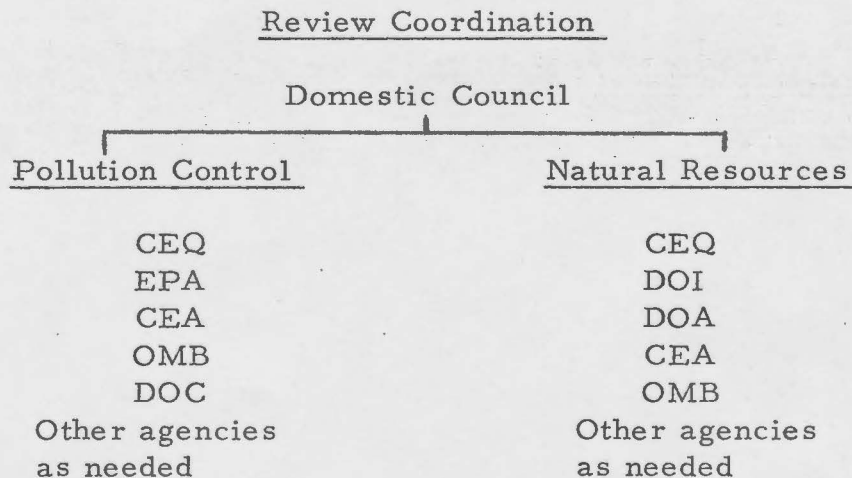


Precise objectives for the natural resources phase are:

1. Describe public lands natural resources: minerals, timber, rangeland, wilderness, etc.
2. Determine current and projected demand for goods and services from public lands: energy and mining, forest products, recreation, etc.
3. Assess capacity of public lands to meet demands for goods and services.
4. Identify important conflicts among alternative demands upon public lands.
5. Propose actions to resolve conflicts and/or to increase capacity of public lands to meet needs.

ORGANIZATION

The review groups should be organized as shown below and consist of appropriate agency representatives:



TIMETABLE

The review group should report to the Domestic Council with a study plan within two weeks, detailed outline within six weeks, an interim report three months later, and a final report three months after that. The total lapsed time from initiation through final report would be approximately eight months.



Sent to Mike Duval March 25 - "No comments"

Domestic Council

ENVIRONMENTAL POLICY STUDY

PURPOSE OF STUDY

To develop information and conclusions concerning Federal environmental policies and programs which will provide a basis to enable the Domestic Council to determine if changes are warranted.

STUDY OBJECTIVE

A) Overview

- (1) To assess the effectiveness of Federal [Government] environment policies and programs.
- (2) To determine if these environmental policies and programs are consistent with or hinder the attainment of other national objectives.
- (3) To determine the cost of Federal environmental programs and who ultimately bears these costs.
- (4) To determine the impact of these environmental policies and programs on the relationships between
 - the Federal, State and sub-State governments; and
 - Government and the private sector.

B) Specific Goals

- (1) Effectiveness of Federal actions
 - Air Pollution
 - are the statutory goals adequate?
 - are statutory goals being met?
 - have regulations and court cases gone beyond statutory goals?



- Water Pollution
 - are the statutory goals adequate?
 - are statutory goals being met?
 - have regulations and court cases gone beyond statutory goals?
- Land Pollution
 - are the statutory goals adequate?
 - are statutory goals being met?
 - have regulations and court cases gone beyond statutory goals?

(2) Consistency with Other Objectives

- Define other objectives
 - e.g., - Energy Facility Siting
 - Automobile Fuel Efficiency
 - OCS Production
 - Agriculture Production
 - Transportation Facility Development
- Quantify delays (etc.) imposed by environmental laws, regulations, etc.

(3) Costs of Environmental Programs

- Pull together existing cost/benefit studies, inflation impact reports, etc.
- Study cost impacts on
 - businesses and consumers
 - competitive relationships of businesses
- Develop several representative case histories of full cost impact of a particular standard, e.g., auto emissions.

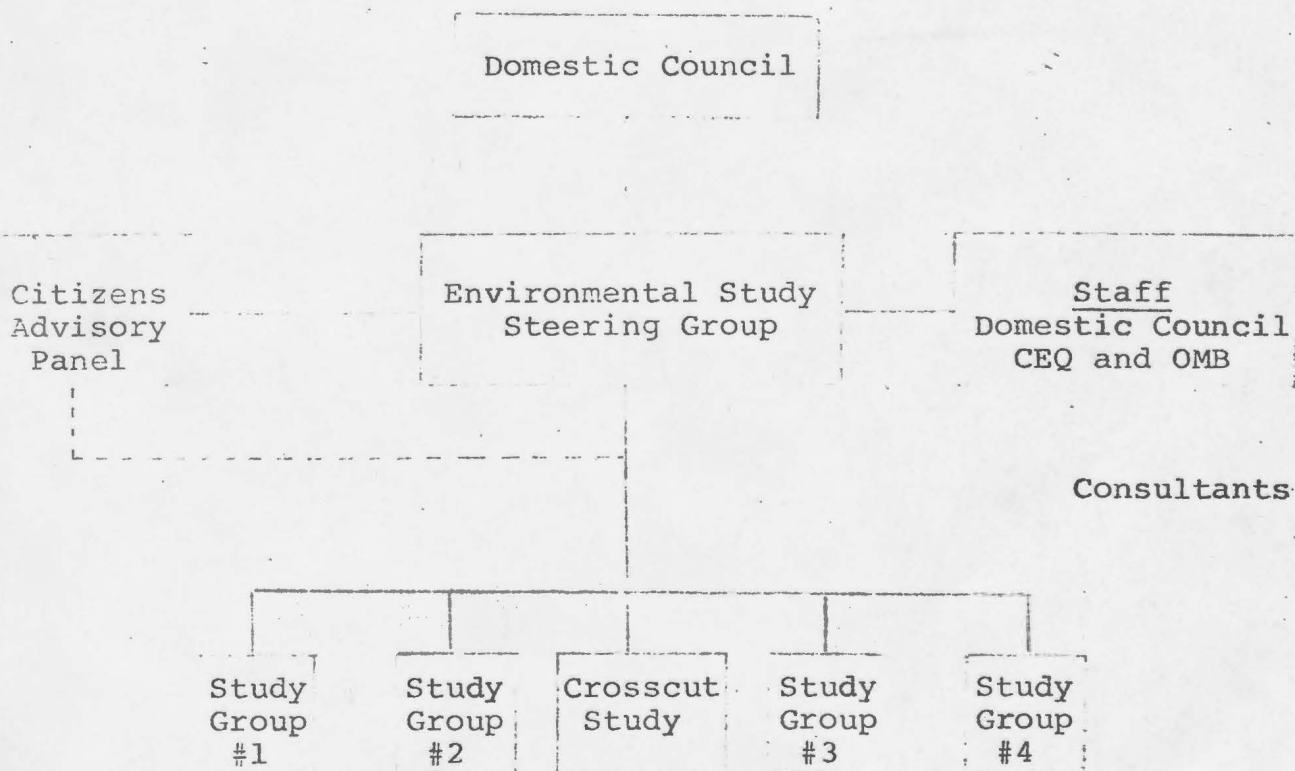


(4) Federal, State, sub-State and Private Sector Relationships

- Develop a "snapshot" of current policies, laws and processes of implementation for governments.
- Assess trends of government control over private sector land use decisions.

ORGANIZATION

A steering group (consisting of Domestic Council members) will assign tasks to a "lead" department or agency. An "Advisory Panel" should be used, made up of outside people including representatives from State and local government. Domestic Council staff, CEQ and OMB should have primary staff responsibility to support the steering group.



TIMETABLE

The study should be completed by the Fall of 1975. This will permit the State of the Union and FY '77 Budget to reflect its conclusions and legislative recommendations.

See rough chart on timing which follows.



Domestic Council
ENVIRONMENTAL STUDY
TIMETABLE

FUNCTION	April	May	June	July	August	September	October
• Study Definition	_____						
• Organization	_____						
• Study Group Tasks							
- Statement of Purpose and Method	_____						
- Data Collection		_____	_____	_____	_____		
- Outline of Report				_____	_____		
- Draft Report						_____	
- Crosscut Review			_____		_____	_____	
- Final Report (draft)							_____
• Advisory Panel							
- Appointments	_____						
- Meetings with Study Groups		_____		_____		_____	
- Reports					_____	_____	
• Steering Group Report							
- Outline					_____	_____	
- Draft						_____	
- Final							_____
• Conclusions and Recommendations							
- Meetings with President						_____	_____
- Draft legislation, Msgs. and Executive Orders							_____

File

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

APR 11 1975

MEMORANDUM FOR NORMAN ROSS
Domestic Council

SUBJECT: Broad Study of the U. S. Environment

The comments below on your study outlines for pollution control and natural resources are essentially the same as those I indicated in our discussion. However, I thought it might be useful to you if I wrote them out.

Pollution Control

Generally, the four objectives appear too broad and too judgmental in nature to expect a committee to reach any consensus on them. Any conclusions drawn on the objectives would necessarily be value laden, especially numbers 1 and 3. This results from a lack of adequate data availability. The lack of hard data may be a serious problem in carrying out the study. In part, these four items are being covered by a congressional advisory committee, as a part of a report to the Congress, coinciding with consideration of renewal of the Water Pollution Control Act.

One alternative way to approach the subject would be to subdivide the general subject of pollution control into parts, such as water pollution, air pollution, etc. Approaching these parts could be easier, since more factual information should be available, and the conclusions could be an analysis of potential tradeoffs (costs vs. benefits). By subdividing the subject into more discrete issues, the study would be more micro and factual, with the results having more credibility.

Natural Resources

The four specific study objectives look pretty good. One suggestion is that Objective 5 might also include the identification of potential tradeoffs.



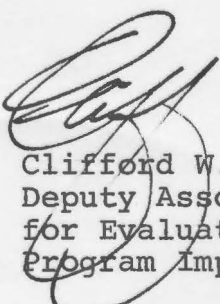
Organization

The only major suggestion I have on the organization of the study groups would be provision for the use of consultants and outside experts. It will probably be necessary to tap selected expertise from outside the Federal Government (State and local governments, research organizations, etc.) as well as use consultants to conduct field assessments. Thus, funds for these purposes should be available.

Timetable

The general approach you have outlined seems appropriate. However, if you subdivide the subject, I would suggest you consider time phasing the projects, potentially using slightly different interagency groups on each one. As well, you might want to conduct only one study at a time, rather than attempting to do both at the same time. As a general rule, I think it is wise to take on something less than what you think would be possible, given the premise that the thing will get larger and more difficult once underway.

If I can be of further help, please let me know.



Clifford W. Graves
Deputy Associate Director
for Evaluation and
Program Implementation



April 14, 1975

MEMORANDUM FOR: DICK DUNHAM
FROM: NORM ROSS
SUBJECT: Environmental Study

I have reviewed the subject draft and concur with it as written.

The timing is excellent in that I understand the staff of the National Commission on Water Quality will have completed its evaluation and have its recommendations by September 1. This will allow us to coordinate their input with those that we develop.



THE WHITE HOUSE
WASHINGTON

April 14, 1975

TO: NORM ROSS
FROM: DICK DUNHAM
SUBJECT: Environmental Study

For review and comments by

3:30 p.m. today, please.

THE WHITE HOUSE
WASHINGTON

DRAFT

April 14, 1975

MEMORANDUM FOR: THE PRESIDENT

FROM: JIM CANNON

SUBJECT: Domestic Council Study of
U.S. Environmental Policy

I recommend that the Domestic Council undertake a study of domestic environmental programs and policies, objectives, direct and indirect costs, and impact on the creation of new jobs and on productivity.

SUBJECT OF STUDY

The study would review existing Federal programs on air and water pollution and land use, including their impact on the consumer and on the economy as a whole, their consequences for specific major industries, and their interplay with State and local priorities.

OBJECTIVE

The objectives of the study are:

- To produce a thorough-going analysis of Federal, State and local environmental programs in operation,
- to assess the efficiency of current environmental programs in meeting national objectives in air and water quality and sound land use, to see if they need improvement, and,
- to formulate for your consideration a series of policy options for modifying existing programs and policies to better service the national interest.



ORGANIZATION

The review group for this study should include appropriate representatives of the following Departments and Agencies:

Treasury	OMB
Interior	CEA
Agriculture	EPA
Commerce	Council on Environmental Quality
HUD	FEA
Transportation	EPB

The review group would be chaired by the Executive Director of the Domestic Council.

TIMETABLE

The study should be completed by October 1, 1975.

PRESIDENTIAL DECISION

Proceed: Yes _____

No _____

Other Action: _____



April 16, 1975

MEMORANDUM FOR: Mr. James M. Cannon
Assistant to the President for
Domestic Affairs

SUBJECT: Domestic Council Study of U. S. Environmental Policy

I have reviewed the draft Domestic Council Study of U. S. Environmental Policy and have the following comments:

1. In my view, there is not need to initiate another study of the impact of environmental programs on the consumer and on the economy. A substantial amount of economic information is already available (attached is a study we previously conducted for the House Appropriations Committee on this subject). In addition, in-depth studies of six industries (the industries with the greatest economic impact) and of their overall impact on capital availability are currently underway, and should be completed in September. As you know, these studies are part of our MBO commitment to the President and to OMB, and we have participation from several of the agencies.
2. The study, as currently outlined, fails to bring into consideration the reasons for environmental programs, chiefly to protect public health as well as other values.
3. In my mind, the most useful contribution of a study of this nature is to analyze the ability and willingness of State and local governments to carry out environmental quality programs. I am concerned that we are losing many of the incentives for State and local governments to take over environmental, as well as other Federal programs. We need a better understanding of the means by which the Federal Government can effectively delegate environmental quality responsibilities to those governments closest to the people.



4. I believe the best type of person to head this study would be someone who has had State/local experience in administering environmental programs. If we do not get this kind of leadership, this could easily be another Federal study without meaningful understanding of State and local needs.

A study which focuses on the State and local government question, as my comments suggest, could have a very significant payoff, and in my opinion, would be very desirable. If it is decided to move ahead with this study, I would like to prepare a draft prospectus for the effort.

I consider a study such as the one outlined in your memorandum to be very significant to the Environmental Protection Agency. I would like to have an opportunity to discuss it with you and, if desirable, with the President.

A minor point: I would eliminate ERC and EPB from the list of formal participants because their component parts are in fact represented in the list.

(sg) Russell E. Train

Russell E. Train



OFFICE OF PLANNING AND MANAGEMENT

IN <i>19 4/15</i>		OUT	
ROUTE TO		ACTION	INFO
Alm			
Brands			
Redenius			
Messner			
Pratt			
Stringer			
Agee			
Beverly/Soaper			
<i>Held</i>			
DUE		DUE AA	
REMARKS <i>Rec'd in OPM 12:15 4/15</i>			
<i>AA -</i> <i>I gave a copy of this</i> <i>to Paul Brands. Not</i> <i>sure how you want to</i> <i>handle in view of</i> <i>short deadline (Wed.</i> <i>4/16).</i> <i>era 4/15</i>			



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

4/14

al alm

special

4/15/75 Hand Delivered
11¹⁵ Am

Delivered

THE WHITE HOUSE
WASHINGTON

April 14, 1975

MEMORANDUM FOR:

The Honorable Rogers C. B. Morton
Secretary of Interior

✓ The Honorable Russell E. Train
Administrator, Environmental
Protection Agency

The Honorable Frank G. Zarb
Administrator, Federal Energy
Administration

SUBJECT:

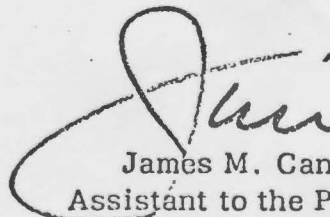
Domestic Council Study of U.S.
Environmental Policy

The attached memorandum proposes a Domestic Council Review Group to study domestic environmental programs and policies on air and water pollution and land use.

Before submitting this memorandum to the President, I wanted to obtain your views as well as any suggestions or recommendations you may have.

I would appreciate having your input Wednesday midday, April 16th so that a complete package may be sent to the President that evening.

Thank you.



James M. Cannon
Assistant to the President
for Domestic Affairs

Attachment



THE WHITE HOUSE

WASHINGTON

ACTION

April 14, 1975

MEMORANDUM FOR: THE PRESIDENT

FROM: JIM CANNON

SUBJECT: Domestic Council Study of
U.S. Environmental Policy

I recommend that the Domestic Council undertake a study of domestic environmental programs and policies, to determine their effectiveness, consistency with other national objectives, direct and indirect costs, and impact on the creation of new jobs and on productivity.

SUBJECT OF STUDY

The study would review existing Federal programs on air and water pollution and land use, including their impact on the consumer and on the economy as a whole, their consequences for specific major industries, and their interplay with State and local priorities.

OBJECTIVE

The objectives of the study are:

- To produce a thorough-going analysis of Federal, State and local environmental programs in operation;
- to assess the efficiency of current environmental programs in meeting national objectives in air and water quality and sound land use, to see if they need improvement; and,
- if warranted by the conclusions of the study, to formulate for your consideration a series of policy options for modifying existing programs and policies to better serve the national interest.

ORGANIZATION

The review group for this study should include appropriate representatives of the following Departments and Agencies:

Treasury	OMB
Interior	CEA
Agriculture	EPA
Commerce	CEQ
HUD	ERC
Transportation	EPB

The review group would be chaired by the Executive Director of the Domestic Council.

TIMETABLE

The study should be completed by October 1, 1975.

DECISION

Proceed: Yes _____

No _____

Other Action: _____

