

Excerpt from *The Quiet Shift of Power: Virginia Natural Resources Journal 1984-1985*

As discussed *supra* text accompanying notes 5-17, OMB may combine its vast array of powers with the veto threat to effectively persuade EPA. No *overt* threats of such sanctions have been cited by EPA officials in interviews, but the mere existence of such powers may have a chilling effect on EPA's willingness to contravene OMB orders. "Thousands of transactions a year with OMB" take place; therefore if you've publicly humiliated OMB they'll get even—this can come in many different ways".

There is "an old OMB saying: get in below the bow line", in other words, get involved in agency rulemaking as early as possible to maximize influence on rules that are still in their formative stages. *Interview with Jim Tozzi May 14, 1983*

Beginning with the Johnson Administration, OMB's predecessor, the Bureau of the Budget, made independent attempts to oversee and influence the development of important agency regulations in the President's name. *Interview with Jim Tozzi June 14, 1983*)

Although the Budget Examiners and Desk Officers are "just G. S. twelves or fourteens, if both of them get on your (agency's) case, you're in a lot of trouble."

A key former OMB official admits that OMB has “a loving bias against regulation....a rebuttable presumption against regulation but insists that this bias results from OMB’s “neutral competence” rather than from any pro-industry bent.

After EPA Administrator Burford issued a rule under court order without first receiving OMB approval, “Late that evening I received a call from an OMB official...who said words to this effect: that there was a price to pay for doing what we had done and we hadn’t begun to pay.