

Congress of the United States
Washington, DC 20515

October 18, 2018

The Honorable Andrew Wheeler
Acting Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Wheeler:

We are aware of your intent to dissolve the Office of the Science Advisor at the Environmental Protection Agency (EPA) and merge its staff with the Office of Science Policy, and we write to express our strong opposition. This unnecessary and counterproductive consolidation will undermine scientific integrity, jeopardize bedrock public health and environmental standards, and endanger the EPA's ability to fulfill its mission of protecting human health and the environment.

As a cornerstone of its regulatory process, the EPA relies on the integration of the best available, independent science to inform federal policy. In 1992, a four member EPA panel that included two members of the National Academy of Sciences recommended that the EPA Administrator appoint a science advisor to "ensure that credible scientific information for EPA guidance and decisions is available from both EPA scientists and the broader scientific community."¹ The creation of the Office of the Science Advisor (OSA), independent of the EPA's program offices, was a vital step in recognizing the value of independent scientific analysis. Since that time, the office has provided essential, direct advice to the Administrator and led numerous agency-wide initiatives to improve the use of science.

Eliminating the OSA will jeopardize the EPA's work to standardize and improve scientific practices. The move disregards the importance of autonomy for the OSA and will make it more difficult to investigate allegations of inappropriate political interference or bias in science, particularly within the EPA's Office of Research and Development (ORD). Perhaps most significantly, dissolving the OSA imperils your access to informed, objective advice both in the development of rulemaking and the EPA's role in responding to disasters.

Additionally, the EPA's proposed changes to the OSA appear to be yet another attempt to diminish and dismiss the role of scientists. The Agency has proposed rulemaking to block access to good science by limiting the scope of research that the EPA can consider in making decisions. The proposed "Strengthening Transparency in Regulatory Science" rule would force the EPA to ignore valuable information discovered during their research because it contains confidential privacy-related health information. Former Administrator Scott Pruitt stacked the Science Advisory Board, which is charged with reviewing the quality and relevance of the scientific and

¹ "Safeguarding the Future: Credible Science, Credible Decisions," U.S. Environmental Protection Agency (EPA), March 1992. <https://nepis.epa.gov/Exe/ZyPDF.cgi/30001ZWJ.PDF?Dockey=30001ZWJ.PDF>

technical information being used by the EPA, with industry representatives in lieu of scientists and independent academics.²

Furthermore, the Administration's budget request for Fiscal Year 2018 proposed eliminating the Office of Environmental Justice, which addresses the disparate environmental burdens on low-income, minority, and indigenous communities.³ Fortunately Congress restored funding for the office, but there is no doubt that the proposed changes would have resulted in disproportionate effects on our most vulnerable communities. The EPA should be taking steps to safeguard children from exposure to environmental hazards during Children's Health Month. Instead, the Office of Children's Health Protection lacks a director and reports indicate that the office may soon be dismantled.⁴ Most recently, the EPA hired David Dunlap, a former Koch Industries lobbyist, to serve as the Deputy Assistant Administrator for Research and Development and the liaison between the ORD and your office.

The continued efforts to eliminate the role of science at the EPA will have chilling consequences for every person who benefits from clean air and clean water, particularly and disproportionately young children, seniors, and the health-impaired.

Earlier this month, the *Washington Post* reported that the OSA was excluded in the development of the EPA's proposed "Strengthening Transparency in Regulatory Science" rule.⁵ Emails from OSA Director Tom Sinks indicate that his staff first learned of the proposal from the media. Given these reports, we are extremely concerned that attempts to move OSA are not intended to elevate its position within the EPA, as some Agency officials have suggested, but rather to weaken its influence.

The EPA's ability to meet its mandate to protect public health and the environment is dependent on the foundation of science that is independently verifiable and free from political interference or bias from ideology or conflicts of interest. At a time when the world is facing the consequences of climate change and extreme weather patterns and toxic substances continue to challenge access to clean air and water, it is striking that the EPA would even consider shying away from the use of robust science. During your first formal address to EPA employees in July 2018, you pledged to defend the work of the Agency's staff. Rather than sidelining science from the policymaking process, we urge you to uphold your commitment to include Agency scientists in the EPA's work, recognize the value of scientific integrity, and maintain an autonomous Office of the Science Advisor.

² Sean Reilly and Kevin Bogardus, "EPA unveils new industry-friendlier science advisory boards," *Science Magazine*, November 3, 2017. <http://www.sciencemag.org/news/2017/11/epa-unveils-new-industry-friendlier-science-advisory-boards>

³ United States Environmental Protection Agency. "FY 2018 EPA Budget in Brief," May 2017. <https://www.epa.gov/sites/production/files/2017-05/documents/fy-2018-budget-in-brief.pdf>

⁴ Coral Davenport and Roni Caryn Rabin, "E.P.A. Places the Head of Its Office of Children's Health on Leave," *The New York Times*, September 26, 2018. <https://www.nytimes.com/2018/09/26/climate/epa-etzel-children-health-program.html>

⁵ Steven Mufson and Chris Mooney, "EPA excluded its own top science officials when it rewrote rules on using scientific studies," *Washington Post*, October 3, 2018. https://www.washingtonpost.com/energy-environment/2018/10/03/epa-excluded-its-own-top-science-officials-when-it-rewrote-rules-using-scientific-studies/?utm_term=.407824f59d93

Sincerely,



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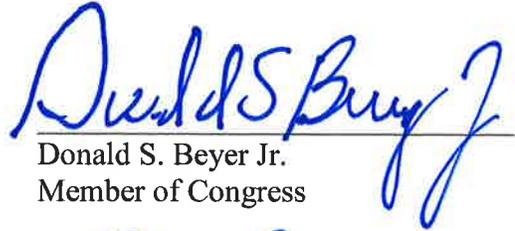
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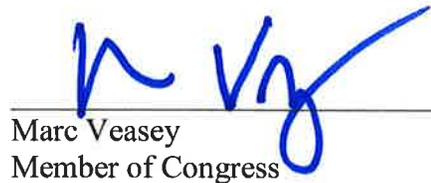
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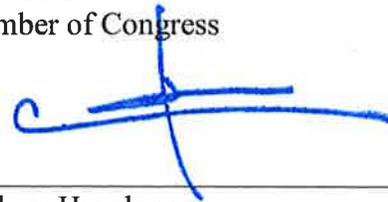
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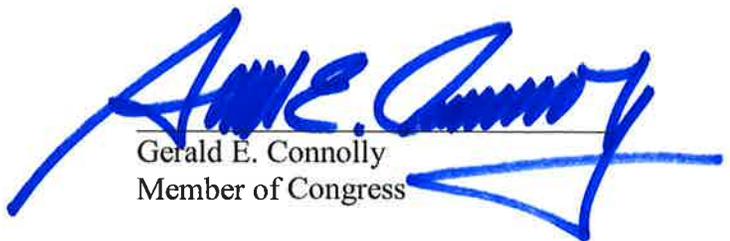
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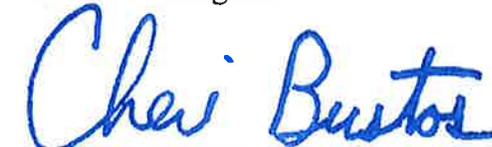

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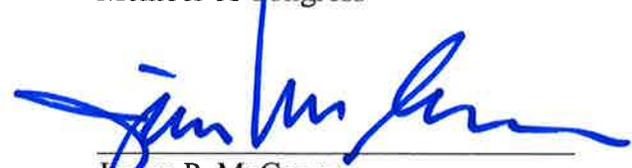

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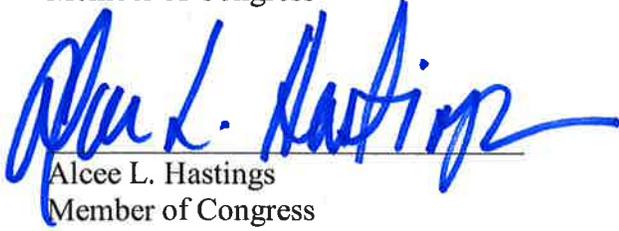

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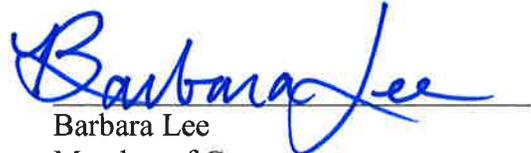
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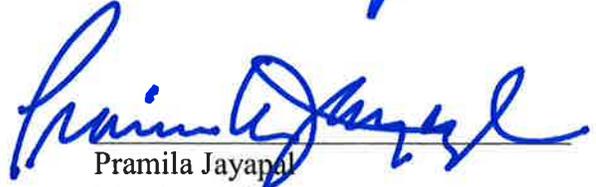
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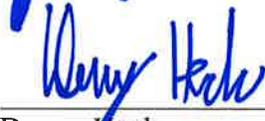
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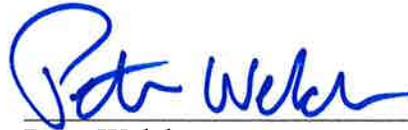
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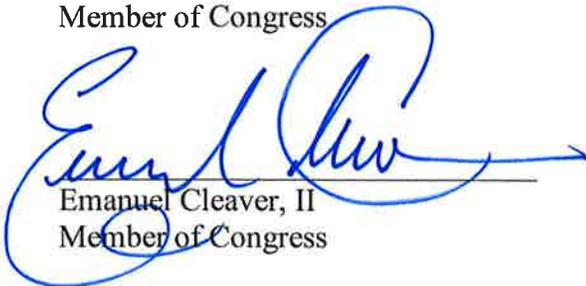
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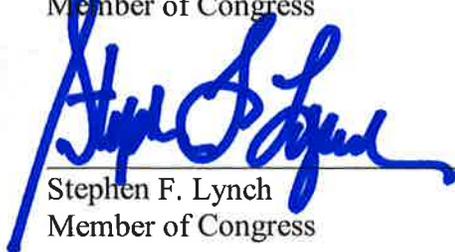
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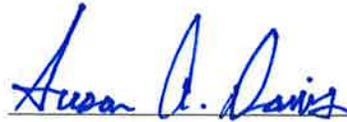
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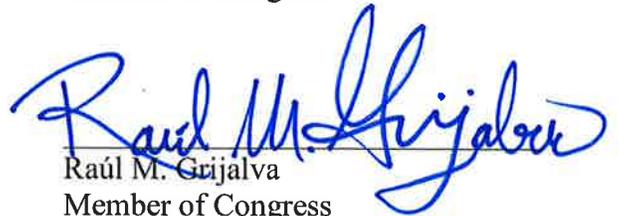
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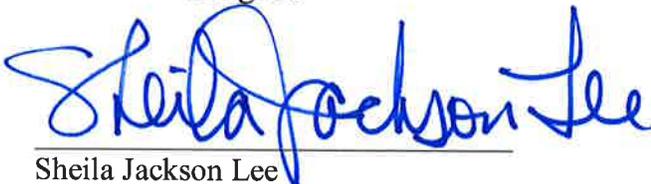
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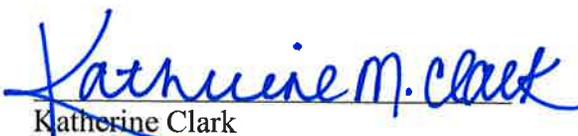
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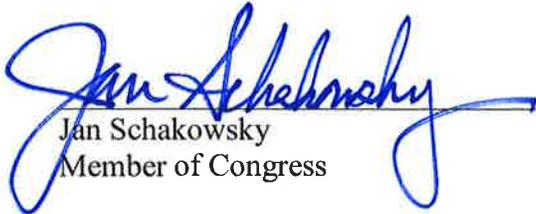
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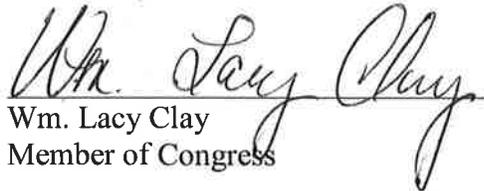

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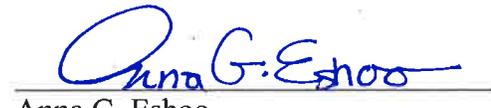

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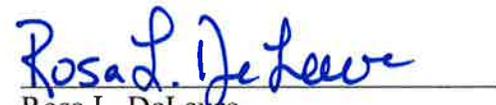

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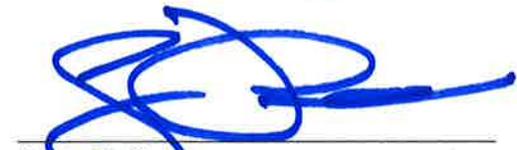

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