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Opinions

If I were still working at the EPA, I would resign

By Bernard D. Goldstein

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Bernard D. Goldstein was chairman of the EPA Clean Air Scientific Advisory Committee and the EPA assistant administrator for research and development under President Reagan from 1983 to 1985. He is dean emeritus at the University of Pittsburgh Graduate School of Public Health.

For years, the fossil-fuel industry has lobbied to weaken air pollution standards. It may now get its wish.

Last week, the Environmental Protection Agency's Clean Air Scientific Advisory Committee [met via teleconference](#) to devise a new standard for airborne particle pollution. It's a vitally important task: These tiny particles reach deep into human lungs, causing significant pulmonary and heart problems. And in many parts of the United States, such pollution exceeds the existing health-based particulates standard.

But EPA Administrator Andrew Wheeler, a former coal-industry lobbyist, has hobbled the committee's long-standing process to the point that its members cannot provide an informed opinion consistent with the [Clean Air Act](#)'s mandate of being "requisite to protect the public health."

I was the chair of the advisory committee, or CASAC, under Anne Gorsuch, President Ronald Reagan's first EPA administrator, and was subsequently appointed by Reagan to head the EPA's Office of

Research and Development under Gorsuch's replacement, the moderate Republican environmentalist William Ruckelshaus. I would have resigned either position had the agency's overall advisory processes been subject to its current destructive alterations.

The EPA's organizational structure necessitates a strong and unbiased external advisory process. By having its own in-house science arm, the agency's political leadership can exert pressure to get the answers it wants. As a counterbalance, it is necessary to have external advisory processes through independent bodies such as CASAC.

Congress established this committee in 1977 to provide unbiased external scientific advice on air-pollutant standards, which are revisited every five years. Congress requires the committee to have seven members, including one from a state agency. But it soon became clear that a seven-member committee would not have sufficient in-depth expertise to make a science-based recommendation. Accordingly, for more than 40 years, the committee has drawn on the expertise of external advisory subcommittees established for each pollutant of concern. These much larger committees openly review the EPA's own scientific analysis of the thousands of pertinent peer-reviewed papers and inform the committee's members of their findings, which committee members then use to recommend health-based standards to the EPA administrator.

That is how it is supposed to work. But last October, Wheeler suddenly and highhandedly **terminated** the subcommittees working to develop recommendations for the particulate standard, as well as the standard for ozone pollution (which CASAC will

review next).

The full weight of providing advice now falls solely on the seven CASAC members. The science underlying particulate standards is especially complex, and the scientific discipline of epidemiology is central to understanding the health effects of both particulates and ozone. But CASAC, for the first time in memory, lacks a single epidemiologist.

Wheeler has appointed [four state agency members](#) to CASAC, an unprecedented majority. All work for Republican governors. The current chairman of CASAC [is a consultant](#) who also works for industry clients.

Moreover, Wheeler [promulgated a new rule](#) that prohibits scientists funded by the EPA from providing the agency with advice. While the ostensible justification for this rule is to root out any pro-EPA bias, the effect is to disqualify the best scientists from advising the agency. Meanwhile, industry representatives and consultants — including those from polluting industries with a clear interest in lax standards — are welcome to provide advice.

When I served at the EPA, Gorsuch was criticized for attempting to control the statements of EPA scientists and cutting the agency's science budget, as has current EPA leadership. But she did nothing that even came close to the assault on the independence and expertise of the scientific advisory processes carried out by Wheeler and his predecessor, Scott Pruitt.

I had hoped that Wheeler would reverse Pruitt's initial policies. Instead, he has taken them well beyond the point that, were I a member of CASAC, I would have resigned. Neither my conscience, nor my concern for the respect of my peers, would have allowed me

to provide advice on a complex health-related subject when I cannot interact in a scientific consensus advisory process with those who have the necessary expert credentials.

I cannot ask President Trump's EPA assistant administrator for research and development to resign. That [position remains unfilled](#). Nor is it likely that any credible scientist would accept such a nomination. But I urge the current members of CASAC to step down rather than seemingly acquiesce to this charade. The EPA's leadership is destroying the scientific foundation of environmental regulations, to the detriment of the health of the American people and our environment.

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