

Testimony of Bernard Goldstein at the Public Teleconference of the Chartered Clean Air Scientific Advisory Committee (CASAC) on Particulate Matter (PM)

October 22, 2019

Thank you, Aaron – and CASAC members.

I am the former EPA Assistant Administrator for Research and Development (R&D) under President Reagan, and I am an elected member of the National Academy of Medicine.

I will expand on my prior comments on March 28th in which I reviewed the history of CASAC, including my serving as a member of two CASAC subcommittees in 1980-81 and as Chair of CASAC in 1982-83 under Administrator Anne Gorsuch.

Prior to that, in 1966-68, I served as a commissioned officer in the U.S. Public Health Service (USPHS) division of air pollution, an organization which in 1970 was merged into the new EPA as part of its science arm. An illuminating contrast is that Occupational Safety and Health Administration (OSHA), which was also formed in 1970, has its research arm in a completely separate organization. EPA has a tremendous advantage in developing science-based regulation by having its science arm within its agency – but it also has a disadvantage in that it is much easier for EPA's political arm to lean on its scientists. To combat this, Congress brought in the external scientific community by establishing CASAC in 1977, and in 1978 the Science Advisory Board (SAB), as well as others. Attacking this Congressionally mandated antidote is what is under way in this administration.

Administrator Wheeler has given the rationale for truncating the National Ambient Air Quality Standards (NAAQS) review process, including firing the particulate and ozone subcommittees, as that of meeting the requirement for a review every five years. But his rationale is incompatible with the actions he has taken. Four of the six health NAAQS are now beyond the five year goal. If the goal was to get as close as possible to meeting the five-year deadline for each, then why not start with the two most out of compliance, which are carbon monoxide and nitrogen dioxide? He has not.

Now, I don't disagree with focusing on particulates and ozone: they are the two NAAQS pollutants that clearly are affecting the health of most Americans. But this health impact should be a rationale for a more careful process, rather than this sham, which is distorting the long development of EPA's science-based response to the threat to our health posed by NAAQS.

And I completely agree with Dr. Goldman's comments about doing a policy review before a science review is completed. This is another important distortion of carefully developed CASAC processes.

As I said at the beginning of my comments, I chaired CASAC under Anne Gorsuch. Administrator Gorsuch was chosen by President Reagan to carry out policies related to the environment that in their campaigns seemed little different in tone than those of President Trump. Ms. Gorsuch, like Mr. Pruitt and Mr. Wheeler, showed disregard for science by disproportionate budget cuts and by attempting to muzzle internal EPA scientists. But I can assure you that Administrator Gorsuch never messed with the integrity of the CASAC process. If she had attempted anything close to what is actually happening at EPA now, I would most certainly have resigned.

While there have been some marginal improvements in the process, my comments about your seriously considering resignation are unchanged.