April 22, 2025

Senator Lisa Murkowski, Chair
Senator Mitch McConnell
Senator Shelley Capito
Senator John Hoeven
Senator Deb Fischer
Senator Markwayne Mullin
Senator Mike Rounds

Senator Jeff Merkley, Ranking Member
Senator Chris Van Hollen
Senator Martin Heinrich
Senator Tammy Baldwin
Senator Kirstin Gillibrand
Senator Jon Ossoff

Interior, Environment, and Related Agencies Subcommittee
United States Senate Committee on Appropriations
Room S-128, The Capitol
Washington, D.C. 20510

Dear Chair Murkowski, Ranking Member Merkley, and Honorable Members of the Subcommittee:

As former Assistant Administrators of the Office of Research and Development (ORD) of the U.S. Environmental Protection Agency, we write to ask for your support for ORD.

The **1978 Environmental Research, Development, and Demonstration Authorization Act** required EPA to "establish a **separately identified program** to conduct **continuing and long-term environmental research and development**". ERDDAA expressed Congressional intent that EPA establish "a **national environmental laboratory, or a system of such laboratories**, to **assume or supplement the long-term environmental research functions**" and that "the **research efforts** of the Agency **reflect the needs and priorities of the regulatory program offices, while maintaining a high level of scientific quality**." Thus, Congress called for a program separate from the regulatory program offices to develop science relevant to their needs.

Recognizing that **science is essential to support EPA's mission**, **numerous statutes require EPA to use the best available science**. For example, the **Clean Air Act** requires the EPA to rely on science for setting emission standards and health-based air quality standards. The **Safe Drinking Water Act** requires the EPA to consider the best available peer-reviewed science when setting health-based standards. The **Clean Water Act** requires surface water quality criteria that reflect the latest science. The **Toxic Substances Control Act** requires the EPA to use the best available science to assess risks of chemicals to human health and the environment.

Best available science must be evidence based, unbiased, objective and value-neutral. It must be the result of the scientific process and hypothesis testing by scientists, subject to independent expert peer review. **Federal courts have affirmed or required that EPA use best available science**. **This is what ORD provides**.

We are aware of the criticisms of ORD by Project 2025. Although they may present the opinions of some stakeholders, these allegations are not supported by evidence. ORD conducts science that is responsive to statutory authorities, legal precedent, legislative input, partner needs, scientific peer review, and public input.

ORD does not make policy decisions. ORD **develops and translates science** that is used by the EPA program offices and other partners to make decisions informed by science, but taking into and other factors including economic, health and social impacts, and technical feasibility.

ORD's **workforce and research assets are essential** to the Agency's ability to develop and translate science directly related to its mission in a manner that is responsive to partner needs, of high quality, and timely. By having researchers and research assets operate under one headquarters office, **EPA realizes operational and cost efficiencies**.

ORD works closely with the **Environmental Council of States**, the **Environmental Research Institute of the States** and others to inform decisions of states and territories in support of **cooperative federalism**. For example, ORD scientists have conducted work in **Alaska** to address hazardous waste disposal in rural communities, provide technical support related to unlined landfills in remote areas, support cleanup near Salt Chuck Mine using biochar, provide technical support for PFAS site characterization, and develop improved modeling of wintertime air quality in Fairbanks.

ORD has to **justify its budget requests** and **receives appropriations** for its national research programs from Congress. As administrations change, Agency priorities change. ORD scientists and staff have the expertise and capabilities to respond to new priorities, as they have done over many Administrations in past decades.

When disaster strikes, ORD is called. When **anthrax** threatened the U.S. Capitol, ORD and the Agency's emergency response staff monitored 26 buildings, found contamination in seven, decontaminated office suites, mail handling areas, and HVAC systems, and conducted confirmation sampling before granting reentry. In the aftermath of the **World Trade Center attack**, ORD developed cleaning and testing programs for indoor residences in lower Manhattan. ORD monitored and cleaned up hazardous materials after the **Columbia Shuttle disaster**. ORD has assisted the nation's recovery from **every major hurricane** in the last decades including the recent **Helene**, aiding the **cleanup of water infrastructure**, and **restarting affected drinking water and wastewater systems**. ORD supported the **East Palestine, OH** train derailment response by assessing commercial hand-held monitors used to determine if homes were clean, informing **screening levels** based on **rapid toxicological assessment** of chemicals of concern, and addressing concerns regarding potential dioxin deposition in **downwind farmland**.

ORD provides **cutting-edge world-class science** that contributes to **United States scientific and technological superiority**. ORD supports **private sector innovation** via **Small Business Innovation Research** focused on **developing and commercializing innovative technologies** that address the Agency's mission. ORD science is invigorated by **close partnerships with industry** such as with **Proctor and Gamble, Syngenta, Corteva Agriscience**, and others. ORD **strategically enhances and expands external research collaborations** to leverage **multidisciplinary scientific talents** and **resources of existing and new partners**.

In alignment with Administration priorities, ORD is a leader in the development and adoption of **machine learning** and **artificial intelligence** (ML/AI). For example, ORD research is advancing the application of ML/AI to more efficient review and **screening of exposure** and **toxicity** of chemicals, **disaster recovery**, **environmental remediation**, **drinking water safety**, prediction of **water quality**, prediction of **harmful algal blooms**, and others.

ORD's unique world class capabilities are the result of **decades of carefully stewarded taxpayer investment** in the development of **specialized research facilities, laboratories, field sites, high performance computing, methods, processes, and procedures** that **uniquely position** EPA to meet **today's and tomorrow's scientific and technological challenges**. It is a unique national asset. The diminishment or loss of this national asset would degrade the ability of the United States to be prepared for the future and responsive to myriad challenges that lay before us.
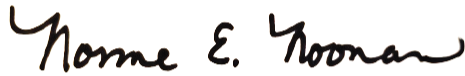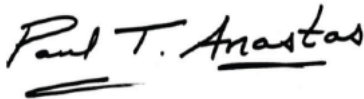
Respectfully,

Dr. Bernard Goldstein
(EPA Assistant Administrator ORD 1983-1985)

Dr. Robert J.Huggett
(EPA Assistant Administrator ORD 1994-1997)

Dr. Norine E. Noonan
(EPA Assistant Administrator ORD 1998-2001)

Dr. Paul T. Anastas
(EPA Assistant Administrator ORD 2009-2012)

Dr. Thomas A. Burke
(EPA Assistant Administrator ORD 2015-2017)
(*twice nominated but not confirmed*)

Dr. H. Christopher Frey
(EPA Assistant Administrator ORD 2022-2024)