

ENVIRONMENTAL PROTECTION NETWORK

Comments on the List of Candidates under consideration for appointment to the CASAC.

To: Mr. Aaron Yeow, Designated Federal Officer, Clean Air Scientific Advisory Committee, US Environmental Protection Agency (yeow.aaron@epa.gov)

From: Environmental Protection Network (former EPA Employees)

Thank you for the opportunity to review the qualifications and background of the candidates for service on the Clean Air Scientific Advisory Committee (CASAC). We commend the transparency of the nomination process, which asked the public to nominate diverse and strong candidates to meet the statutory requirements. Among a list which includes some distinguished physicians and scientists who are well positioned to provide high quality advice to the agency is one, Dr. Ana Diez-Roux, who alone fits the statutory criteria for the available slot. There are three who we believe do not match the illustrious membership representing the best of the scientific community that has characterized the CASAC, an advisory committee critical to EPA decision processes.

Our understanding is that the current vacancy in this committee of seven experts, as defined by statute, is for an individual who has the rather unusual combination of being a Medical Doctor and a Member of the National Academy of Sciences (NAS). Although there are medical doctors on the list and a very few NAS members (i.e., elected members, not members of NAS or NRC panels), there is only one candidate who is both: Dr. Ana Diez Roux. We strongly support Dr. Diez Roux because of her credentials, scientific reputation in the field of air quality, and past meritorious service to CASAC. No other candidates meet the minimum statutory requirements for the opening.

We also want to comment on three who we think should not be considered. We fully accept that this scientific advisory committee should draw on a broad wealth of information to inform and enhance their deliberations. However, it should be careful to assure that deliberations are not skewed by personal financial interests and that members have the best possible scientific credentials.

There is one individual whose financial interests might be of concern and could preclude his selection or be a candidate for recusal if named: Dr. Jeffrey R. Lewis. Two others, Drs. Deane Waldman and S. Stanley Young, do not seem to fit the profile of deep expertise characteristic of the CASAC.

Dr. Jeffrey Lewis has had one employer for the last 27 years, ExxonMobil Biomedical Science, Inc. As someone with deep financial ties to ExxonMobil, his participation in making recommendations on matters that could have a direct and predictable effect on refinery operations could be problematic. If he were ever to be appointed to the CASAC, this conflict of interest should make him a candidate for recusal from most matters before the committee.

The biographies of Drs, Deane Waldman and S. Stanley Young with respect to the expertise needed for CASAC in air pollution and its effects on human health and the environment are, at best, thin

and do not match those of other applicants in terms of breadth and depth of expertise and experience.

Again, there are many fine candidates presented. The three discussed above, however, present concerns that would preclude their being able to effectively advise on matters on the complex matters that come before the CASAC.

This recommendation comes from the Environmental Protection Network. We are a group of volunteers with backgrounds in environmental programs at the federal, state and local levels. Our teams include scientists, engineers, economists, lawyers and many others. We have worked in both Republican and Democratic administrations and we know the importance of well run and well-resourced programs and of the federal advisory committees that provide them with important scientific advice.