

Comments from Dr. Barton J. Thompson

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I very much like the report and letter. It is short and to the point. More importantly, it covers all of the central issues with clarity and focus. I therefore only have some relatively small comments and suggestions.

Letter to the Administrator: The idea of "science integration" is introduced quite abruptly and with little background. If everyone believes that the Administrator will know what we mean by "science integration," this is not a problem. But without background, I would have little understanding based on the letter's simple statement that "Science integration ... involves integrated thinking about complex environmental problems." I also wonder whether it would be worth setting out in quick, bullet style some of our recommendations in the letter. The letter does a good job of making the general pitch and emphasizing that the science integration is consistent with the Administrator's vision, but on the assumption that this is all the some will read, it might be worth saying a bit more about our recommendations.

Report, p. iii: Stanford has recently told me that my chair is officially titled the "Robert E. Paradise Professor in Natural Resources Law," rather than the "Robert E. Paradise Professor of Natural Resources Law," so "of" needs to be changed to "in."

Report, p. 1: A verb appears to be missing from the sentence at lines 27-30. The text that is quoted here from the 2000 SAB report is also requoted immediately below at lines 36-39. I would recommend just dropping the sentence at lines 27-30.

Report, p. 4: I worry a bit about the passage at lines 22-25. The report is absolutely accurate that, because the actual setting of NAAQSs does not integrate a cost-benefit assessment, it does not fully implement SAB's recommended approach. But as the passage points out, this is because the law forbids formal consideration of economics in the setting of NAAQSs. Congress has effectively already decided that cost should not be considered, presumably because it decided that human health was too important in this context. That's a policy judgment, and I don't see a scientific reason to criticize it. Furthermore, EPA cannot ignore the law, so what is our point here. Further complicating the analysis, EPA does prepare a cost-benefit analysis of NAAQSs in compliance with the current executive order dealing with major regulatory changes, and I believe that health and ecological assessments are part of that analysis. Decision makers do have access to that analysis, although they cannot act on it under the law.

Report, p. 7, lines 28-30: The call for a top science official with responsibility for all research, science, and technical functions seems fully in line with this report. So is there a reason that this is not one of our recommendations?