

October 5, 1977

Dr. Donald Fredrickson
Director
National Institutes of Health
Bethesda, Maryland 20014

Dear Don:

I have been involved with the recombinant DNA issue since the summer of 1973. The motivations for this involvement have been a concern both for the advancement of science and for the assurance of a positive contribution by science to society. Also, I have truly believed that these motivations would be well served by engaging the public in an understanding of science so as to enlighten and enlarge the role of the public in policy matters. Therefore I participated enthusiastically in the development of the Environmental Impact Statement. The opportunity to explore not only an interface, but an interstition of science and political issues promised to be fascinating and productive.

Initially, in the spring and summer of 1976, the effort fulfilled my expectations. The personal intellectual reward was great, in large measure because of interchanges with the remarkable group of people you assembled for the task. And I believe that the product of that effort in late summer, 1976, the Draft Environmental Impact Statement, was a thorough, scientifically sound and honest document, fully capable of informing the public in an unbiased manner. The additional exercise of analyzing and responding to the comments on the EIS was also interesting and helped greatly to improve the document.

From the beginning, however, it was clear that the perception, sensitivity, and dedication evident in the NIH staff was not matched by our advisors from the Department. In recent months those early impressions have been reinforced by actions at increasingly higher departmental levels. There is no need to review the herculean voyages of the EIS through the Department, you know them well.

Because of these continuing situations I have decided not to participate further in the EIS process and ask that you excuse me from any additional efforts in this regard. These activities are no longer consistent with my own standards of political and personal morality.

I am, as you know, in total sympathy with the aims of the National Environmental Policy Act and I do, still, believe that the device called an EIS can be used to achieve those aims. However neither those aims nor the public interest are served by forcing each "environmental" issue into the same preconceived analytical structure. The essence of complex problems is that each demands its own analytical framework. Nor are those aims served when a governmental body permits the media, rather than thoughtful and responsible individuals, to define a complex issue. Among the fruitless games dictated by such approaches the "cost-benefit" or "risk-benefit" balance is a good example in the present instance. To pretend that such analyses are rigorous when neither the risks nor the costs, nor the benefits can be described or predicted accurately is foolishness. Such unknowns seriously complicate our dedication to improve and maintain the environment, but it is irresponsible to obscure the complexities. And when creative scholarship or investigation is at issue, the unknowns will always exist. The analyses must then be tempered by these considerations or the results will discourage innovation. A government which, by policy, discourages innovation, also discourages the economic and political viability as well as the health of its people.

In addition to these substantive problems, the appropriate governmental actions should be prompt and efficient. The sense of urgency which governed the NIH activities dramatizes the lack of timely action by the Department. And the proposal that yet another EIS be prepared, on "the experiments themselves" is a proposal for busy work. Regardless of its title, the EIS as it now stands contains all the information that another, ostensibly new, document could conceivably contain (except for a few facts generated since this past summer). We all have more useful things to do.

The EIS is an honest document, though there may of course be errors. To undertake alterations responsive to perceived political or legal exigencies is, I believe, unwise. We have seen how transitory political exigencies are and how their perception varies from person to person. Of course the facts will also change in time, but an honest document at least portrays reality as it was at a given point. Further, I believe that the EIS is a balanced document. The facts presented have not been countered with substantive criticisms; they have of course been countered, but by vague or erroneous argumentation and curious irrelevant political arguments. I, and others, have certainly tried to analyze and understand these "counterarguments", especially during the preparation of the EIS. They fall apart for lack of relevant substance. And serious attempts to have their authors amplify and explain yielded no helpful results. It would be irresponsible for us to present such "counterarguments" to the public in an official government document.

Finally, I would like to thank you for the opportunity to work with you and your staff on these matters. Hopefully it is clear that I have no misgivings about my participation up to now, quite the contrary.

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Among many other things, I have acquired a deep admiration and esteem for you, and your distinguished predecessors. To have built, and to maintain the extraordinary scientific institution that the NIH is, in the context of the political pressures I now understand, is a most remarkable and marvelous achievement.

With affectionate regards,

Sincerely,

Maxine Singer