

March 21, 2006

Ms. Lauren Alexander
c/o The National Academies of Science
500 Fifth Street, NW
Washington, DC 20001

Re: National Academy of Sciences Project: WSTB-U-04-04-A

Dear Ms. Alexander,

The undersigned organizations are writing to protest the composition of the Hydrologic Impacts of Forest Management Committee, and to urge the National Academies of Science to revise the committee's membership. The conflict of interest and imbalance of the current committee are inconsistent with the policy of the National Academies and will undermine the credibility of the committee's report.

This committee was requested by the Department of the Interior's Bureau of Reclamation and will be evaluating some of the most hotly contested issues facing water resources in our forests today: extreme weather events, climate change, fire and invasive species. In recent years, legislative and administrative actions have sought to dramatically change the policies that govern forest health and management. Congress is currently considering legislation that seeks to waive the National Environmental Policy Act (NEPA), as well as various water quality statutes, for logging projects. The Forest Service is finalizing regulations to exclude forest management plans from review under NEPA. Our national forests supply clean drinking water to tens of millions of Americans and provide some of the most important aquatic habitat in the country. In addition, water function is a critical component of a forest ecosystem. Any panel established to consider forest hydrology must be solidly grounded in science, and any bias must be countered with an opposing view.

First, we request the committee remove George Weyerhaeuser, Jr., whose conflict of interest is straightforward. He is senior vice president of technology of the Weyerhaeuser Company, one of the largest forest products companies in the world. The National Academies' conflict of interest policy, defined by statute 5 U.S.C. App. §15(b)(1)(A), states that financial conflicts of interest include employment relationships if they are "relevant to the functions to be performed."¹ Since the committee is deliberating the effects of land use on forest hydrology, and forest product companies have a tremendous impact on land use through their planting and harvesting, the deliberations of this committee will directly affect the Weyerhaeuser Company. Therefore, by NAS policy, he should not have been appointed unless his appointment was "unavoidable" because of his expertise. It is our view that any expertise Mr. Weyerhaeuser brings could easily be gotten elsewhere. Moreover, if the NAS staff did

¹ "Policy on Committee Composition and Balance and Conflicts of Interest," (2003)
http://www.nationalacademies.org/coi/bi-coi_form-0.pdf

decide this was an "unavoidable" conflict of interest, they are required by NAS policy to "promptly and publicly" disclose it – which has not been done.

We also request a balanced committee. The current committee does not have a single scientist from a conservation organization or a scientist with expertise in biological systems. NAS policy states that "in order to ensure that a committee is fully competent, [members are appointed] in such a way as to represent a balance of potentially biasing backgrounds or professional or organizational perspectives."² Yet the appointment of two forest industry consultants, Michael Kavanaugh of Malcolm Pirnie, Inc. and Suzanne Birmingham Walker of Azimuth Forestry Services, has not been counterbalanced by conservation-minded scientists or environmental group employees representing public or environmental interests. The bias of the committee as it stands is slanted toward private industry interests, whose function is not necessarily in the best interest of sustainable forest management practices, including improved water quality.

NAS policy suggests that "conclusions by fully competent committees can be undermined by allegations of conflict of interest or lack of balance and objectivity."³ We agree. The conflict of interest and lack of balance on the Hydrologic Impacts of Forest Management Committee clearly runs that risk, a situation that is unacceptable. To ensure public faith in the forthcoming report from this committee, you should immediately remove Mr. Weyerhaeuser and balance the committee with scientists whose expertise in forest hydrology from a conservation perspective will offset the possible biases brought to the committee by the industry consultants you've already appointed.

The signers of this letter stand ready to help you identify qualified and available candidates for these positions. Examples of qualified candidates include: James R. Karr, Ph.D., Professor, Aquatic Sciences and Biology, University of Washington; Christopher Frissell, Ph.D., Senior Staff Scientist, Pacific Rivers Council; Jon Rhodes, Senior Hydrologist, Planeto Azul Hydrologic Consultants; and Leslie Reid, Ph.D., Research Geologist, U.S. Forest Service Pacific Southwest Research Station.

Sincerely,

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^{2,3} "Policy on Committee Composition and Balance and Conflicts of Interest," (2003)
http://www.nationalacademies.org/coi/bi-coi_form-0.pdf

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