April 12, 2023

The Honorable Joe Biden
President of the United States
The White House
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

The Honorable Deb Haaland
Secretary of the Interior
1849 C Street NW
Washington, DC 20240

Re: Scientists Concerned about Rule of Law and Scientific Integrity at US Fish and Wildlife Service

Dear President Biden and Secretary Haaland:

We the undersigned scientists are gravely concerned that the current Director of the U.S. Fish and Wildlife Service (Service) is not a “scientist” in direct violation of federal law.

In 1973 Congress passed the Endangered Species Act, which requires decisions made pursuant to the Act to be based on the best available science. In 1974 Congress modernized, by law (16 U.S.C. 742b(b)), the current U.S. Fish and Wildlife Service. Recognizing the importance of science-based decision-making for conserving the nation’s wildlife, Congress established scientific qualifications for the Director of the new agency, “thereby assuring the appointment of a professionally trained public servant,” who was not subject to “political taint.” (H. Rep. 93-952)

Specific language was included in the federal statute requiring that “[n]o individual may be appointed as the Director unless he is, by reason of scientific education and experience, knowledgeable in the principles of fisheries and wildlife management.” The scientific education requirement is unambiguous and separate from the experience requirement. Since 1964, all confirmed Directors have possessed one or more academic degrees in the natural resource sciences – 3 BS, 9 MS, and 1 PhD.

The current Service Director has no “scientific education” credentials. She has a BA in philosophy from the University of Virginia and a law degree from the University of Montana.

The Service policy on scientific integrity requires that scientific and scholarly information considered in decision-making must be robust, of the highest quality, and the result of the most rigorous scientific and scholarly processes as can be achieved. The policy charges the Director with “[p]roviding leadership for the Service on scientific and scholarly integrity” and “[e]nsuring employees and volunteers are aware of their responsibilities and comply with the policy and any Service-specific guidance.”

A scientific education informs good science-based decisions. Without specific academic training in the natural sciences, the Service Director lacks a sufficient scientific understanding of the natural world and its fundamental principles to consider all the biological and ecological factors that are important to ensure the scientific integrity of critical decisions affecting the fate of imperiled species and ecosystems.
President Biden’s Scientific Integrity Task Force conducted a comprehensive assessment of scientific integrity policy and practices in the US government. The assessment emphasizes that science and technology positions in the executive branch should be filled by candidates with appropriate credentials; and recommends that violations of scientific integrity policies should be taken seriously and considered comparable to violations of government ethics rules. The FWS Director is serving in direct contradiction to the Administration’s scientific integrity policies and ethics rules.

A 2022 survey of Service personnel conducted by the Union of Concerned Scientists revealed the persistence of significant barriers to science-based decisions within the Service: 43% agreed that the “consideration of political interests” hinders the ability of the agency to make science-based decisions; and 19% agree that the “absence of leadership with scientific experience” also hinders science-based decision-making. See raw survey tabular results here.

We are a nation of laws. It therefore behooves our elected and appointed leaders to protect the sanctity of our laws by upholding them. It is their sworn and sacred duty. The current Service Director is a licensed attorney in the State of Montana. She has sworn to abide by applicable laws and to be ethical in her practice as an attorney. She knows she is legally ineligible for the position she holds and, thus, fails both standards. It is imperative that the sanctity of our laws and the ethical and scientific integrity of our institutions be protected.

Laws, regulations, and policies requiring science-based decision-making matter. Since the Service Director fails to satisfy the statutory scientific educational requirement enacted by Congress 49 years ago, she is disqualified from occupying the position. We call for the current Director’s immediate resignation or dismissal and replacement by a highly qualified, biological scientist. We also recommend the establishment of an independent, non-partisan committee of highly credentialed scientists to review qualifications of openly recruited candidates for Director of the Service and forward their recommendation of the best qualified candidates to the President and the Secretary of the Interior.

Respectfully Submitted,

David R. Parsons, M.S.
US Fish and Wildlife Service - Retired
Carnivore Conservation Biologist - The Rewilding Institute
Science Advisor - Project Coyote
Albuquerque, NM
ellobodave@gmail.com
505-908-0468

CC:

The Honorable Merrick B Garland
Attorney General of the United States

The Honorable Robert Anderson
Solicitor - U.S. Department of the Interior
The Honorable Mark Greenblatt  
Inspector General - U.S. Department of the Interior

The Honorable Senator Tom Carper  
Chairman - U.S. Senate Committee on Environment and Public Works

Supporting Scientists:

Note: Affiliations provided solely for informational purposes and to indicate the credentials of the cosigners.

Adrian Treves, PhD  
University of Wisconsin - Madison  
Madison, WI

Kirk C. Robinson, PhD  
Western Wildlife Conservancy  
Salt Lake City, UT

Michelle L. Lute, PhD  
Project Coyote  
Sacramento, CA

Bradley J. Bergstrom, PhD  
Professor of Biology  
Valdosta State University,  
Valdosta, GA

David J. Mattson, PhD  
US Geological Survey - Retired  
Livingston, MT

Glenn E. Walsberg, PhD  
Professor Emeritus  
School of Life Sciences  
Arizona State University  
Tempe, AZ

Steven R. Sheffield, PhD  
Professor of Biology  
Department of Natural Sciences  
Bowie State University  
Bowie, MD

W. Alice Boyle, PhD  
Associate Professor  
Division of Biology
Kansas State University
Manhattan, KS

Mark S. Peterson, PhD
Professor Emeritus
Division of Coastal Sciences
University of Southern Mississippi
Ocean Springs, MS

William J. Etges, PhD
Department of Biological Sciences
University of Arkansas
Fayetteville, AR

David F. Parkhurst, PhD
Professor Emeritus
School of Public and Environmental Affairs
Indiana University
Bloomington, IN

Brooke Crowley, PhD
Departments of Geosciences and Anthropology
University of Cincinnati
Cincinnati, OH

Jan M. Reber, PhD
Professor of Biology
Department of Biology, Environmental Science, Public Health and Sustainable Development
Taylor University
Upland, IN

Daniel C. Fisher, PhD
Professor of Earth and Environmental Sciences
Professor of Ecology and Evolutionary Biology
University of Michigan
Ann Arbor, MI

J.P. Michaud, PhD
Professor of Entomology
Department of Entomology
Kansas State University
Agricultural Research Center
Hays, KS

Philip Hedrick, PhD
Professor Emeritus
School of Life Sciences
Arizona State University
Tempe, AZ

William J. Ripple, PhD
University Distinguished Professor of Ecology
Department of Forest Ecosystems and Society
Oregon State University
Corvallis, OR

Sean M. Murphy, PhD
Researcher - Wildlife Ecology and Conservation Biology
Department of Forestry and Natural Resources
University of Kentucky
Lexington, KY

Deborah Brooks Hill, PhD
Professor Emerita
Department of Forestry and Natural Resources
University of Kentucky
Lexington, KY

Rolf O. Peterson, PhD
Research Professor
Michigan Technological University
Houghton, MI

Susan G. Clark, PhD
Yale University, Wildlife Ecology and Policy Sciences, Professor adjunct
Endowed: Joseph F. Cullman 3rd Chair
New Haven, CT

Winston P. Smith, PhD
Principal Research Scientist
Institute of Arctic Biology
University of Alaska – Fairbanks
Fairbanks, AK

Brent H. Smith, PhD
Emeritus Professor of Biology
Earlham College
Richmond, IN

Heidi H. Schmidt, M.S.
Curatorial Assistant
Missouri Botanical Garden
Saint Louis, MO

Russell Lande, PhD
Emeritus Professor of Biology  
University of California - San Diego  
La Jolla, CA  

D. Alexander Wait, PhD  
Professor of Biology  
Missouri State University  
Springfield, MO  

Jonathan Way, PhD  
Founder, Eastern Coyote/Coywolf Research  
Author of *Coywolf: Eastern Coyote Genetics, Ecology, Management, and Politics*  
Cape Cod, MA  

Melissa Savage, PhD  
Associate Professor Emerita  
Department of Geography  
University of California - Los Angeles  
Los Angeles, CA  

C. Dustin Becker, PhD  
Life Net Nature  
2435 Tallavana Trail  
Havana, FL  

Tony Povilitis, PhD  
Wildlife Biologist  
Life Net Nature  
2435 Tallavana Trail  
Havana, FL  

Richard Fredrickson, PhD  
Self-employed  
Missoula, MT  

Callum J. Bell, PhD  
President  
National Center for Genome Resources  
2935 Rodeo Park Drive E  
Santa Fe, NM  

Tracy S. Feldman, PhD  
Associate Professor of Biology  
St. Andrews University – a branch of Webber International University  
1700 Dogwood Mile Street  
Laurinburg, NC  

Kyla Bennett, PhD, JD
Director of Science Policy
Public Employees for Environmental Responsibility
PO Box 574
North Easton, MA

Brett R. Riddle, PhD
Professor Emeritus
University of Nevada Las Vegas
Las Vegas, NV

Dominick A. DellaSala, PhD
Chief Scientist
Wild Heritage, a Project of Earth Island Institute
Berkeley, CA

Brian Miller, PhD
Founding Scientist, Wind River Ranch Foundation, retired
Adjunct Professor, New Mexico Highlands University
Las Vegas, NM

Wayne P. McCrory, B.S. (Hons. Zool.),
Registered Professional Biologist
Wildlife Biologist
McCrory Wildlife Services, Ltd.
New Denver, BC, Canada

Richard Pritzlaff, PhD
Founder and Chair, Board of Directors
Biophilia Foundation
Parsons Island Road
Chester, MD

Theresa L. Lake, PhD
Professor
Biology Department
William Rainey Harper College
Palatine, IL

Goran E. D. Blomberg, PhD (Wildlife Ecology)
(Retired)
Lansing, MI

Fred W. Koontz, PhD
(Retired) Wildlife Biologist
Duvall, WA

Howard Whiteman, PhD
Commonwealth Endowed Chair of Environmental Studies
Professor of Biological Sciences
Director, Watershed Studies Institute
Department of Biological Sciences
Murray State University
Murray, KY

Thomas S. Talley, M.S. (Fisheries)
Ecological Services Field Supervisor
US Fish and Wildlife Service (Retired)
Panama City, FL and
Cookeville, TN

David W. Inouye, PhD
Professor Emeritus
Department of Biology
University of Maryland
College Park, MD

John Harte, PhD
Distinguished Professor of the Graduate School
Ecosystem Sciences/Energy and Resources
University of California
Berkeley, CA

Paul R. Ehrlich, PhD
Bing Professor of Population Studies Emeritus
President, Center for Conservation Biology
Stanford University
Stanford, CA

Anne H. Ehrlich
Senior Research Scientist Emerita
Stanford University
Stanford, CA

Scott Veirs, PhD
Marine biologist and oceanographer
Seattle, WA

Elizabeth A. Hadly, PhD
Paul S. and Billie Achilles Chair of Environmental Biology
Professor of Biology and Earth System Science
HHMI Professor
Faculty Director of Jasper Ridge Biological Preserve
Senior Fellow, Woods Institute for the Environment
Stanford University
Stanford, CA
Ronald M. Nowak, PhD
2101 Greenwich Street
Falls Church, VA

D. A. Crossley, Jr., PhD
Curator Emeritus
Georgia Museum of Natural History
University of Georgia
Athens, GA

Karen D. Holl, PhD
Professor of Environmental Studies
University of California - Santa Cruz
Santa Cruz, CA

Mary Ellen Harte, PhD
Affiliate Scientist
Rocky Mountain Biological Laboratory
Crested Butte, CO

Nick Haddad, PhD
Professor
Kellogg Biological Station
Michigan State University
Hickory Corners, MI

Barbara L Peckarsky, PhD
Emeritus Professor
Department of Integrative Biology
University of Wisconsin
Madison, WI

Terry L Derting, PhD
Emerita Professor
Department of Biological Science
Murray State University
Murray, KY

Yale Sacks, M.D.
Retired Hematologist
Central Point, OR

Susan Morgan, PhD
The Rewilding Institute, Retired
P.O. Box 442
Arroyo Seco, NM

John C. Miles, PhD
Emeritus Professor of Environmental Studies
Western Washington University
Bellingham, WA

Gene E. Likens, PhD
Professor, University of Connecticut
Storrs, CT 06268
Founding President and Distinguished Scientist, Emeritus
Cary Institute of Ecosystem Studies
Millbrook, NY

Diana L. Six, PhD
Professor, Forest Entomology/Pathology
Fellow Royal Society of Entomology
College of Forestry and Conservation
University of Montana
Missoula, MT

Christian Brown, PhD
Postdoctoral Researcher
University of South Florida
Tampa, FL

Carl Safina, PhD
Endowed Chair for Nature and Humanity
University of New York at Stony Brook
Setauket, NY

Roy Heberger, M.S.
AAS, Forestry, Paul Smith's College
BS & MS, Fisheries, University of Michigan
US Fish and Wildlife Service - Retired
Assistant Field Office Supervisor/Idaho Wolf Recovery Coordinator at Retirement

Joseph A. Cook, PhD
Distinguished Professor of Biology
Curator of Mammals
University of New Mexico
Albuquerque, NM

Amy Iler, PhD
Conservation Scientist
Chicago Botanic Garden
Glencoe, IL

Megan Draheim, PhD
Professor in Practice
Virginia Tech
Center for Leadership in Global Sustainability  
Arlington, VA

Eva Lee Sargent, PhD  
Physiology  
Retired  
Tucson, AZ

Charles Blair, M.S.  
BS, Wildlife Ecology, University of Wisconsin  
MS, Wildlife Ecology, South Dakota State University Cooperative Wildlife Research Unit  
Senior Ecologist, CH2M HILL, Retired

Robert L. Beschta, PhD  
Professor Emeritus  
Forest Ecosystems and Society  
Oregon State University  
Corvallis, OR

Mike Bader  
Ecological Research Services  
Missoula, MT

Daniel Herrig, M.S.  
Fish and Wildlife Biologist  
U.S. Fish and Wildlife Service - Retired  
Boise, ID

Jillian Gregg, PhD  
Faculty, Crop and Soil Science  
Oregon State University  
Corvallis, OR

Lee H. Metzgar, PhD  
Professor of Biology and Wildlife Biology [Ret.]  
The University of Montana

Samuel Woodrich, M.S.  
Faculty, Crop and Soil Science and Environmental Sciences PhD Student  
Oregon State University  
Corvallis, OR

Carter Niemeyer, M.S.  
Fish and Wildlife Biologist  
U.S. Fish and Wildlife Service - Retired  
Boise, ID

John G Carter, PhD (Ecology)
Founder, Yellowstone to Uintas Connection
Bondurant, WY

Rodney L. Honeycutt, PhD
University Professor Emeritus
Pepperdine University
Malibu, CA

Paul Beier, PhD
Emeritus Regents’ Professor of Conservation Biology
Northern Arizona University
Flagstaff, AZ

Reed F. Noss, PhD
Provost’s Distinguished Research Professor (retired) and Courtesy Research Professor
University of Central Florida
Orlando, FL

Chad Hanson, PhD
Ecologist
John Muir Project
Ridgecrest, CA

William D. Newmark, PhD
Research Curator
Natural History Museum of Utah
University of Utah
Salt Lake City, UT

James Schmitt, PhD
Emeritus Professor of Earth Sciences
Montana State University
Bozeman, MT

Roland Knapp, PhD
Research Biologist
University of California
Sierra Nevada Aquatic Research Laboratory
Mammoth Lakes, CA

Christine Schadler, M.S.
Conservation Biology
New Hampshire Wildlife Coalition
Webster, NH

Weldon Bosworth, PhD
New Hampshire Wildlife Coalition
Gilford, NH
Rick Van de Poll, PhD
Principal, Ecosystem Management Consultants
Director of Research, Tin Mountain Conservation Center
Sandwich, NH

Staci Baker, DVM
NV 934 CA 15696
Stateline, NV

Melissa Amarello, M.S.
Executive Director, Co-founder
Advocates for Snake Preservation
Silver City, NM

Meade Cadot
Naturalist Emeritus
Harris Center for Conservation Education
Hancock, NH

Jeffrey Smith, M.S.
Director of Research, Co-founder
Advocates for Snake Preservation
Willcox, AZ

Rick Steiner, M.S.
Professor, University of Alaska (ret.)
Founder, Oasis Earth
Anchorage, AK

Wendy M. Brown, M.S.
Recovery Coordinator, Division of Endangered Species (retired)
US Fish and Wildlife Service
Southwest Region
Albuquerque, NM

Lyle Lewis, B.S.
Endangered Branch Chief, NM and Northern CA (retired)
US Fish and Wildlife Service
Springfield, OR

Thomas L. Serfass, PhD
Professor, Wildlife Ecology
North American Coordinator, IUCN Otter Specialist Group
Frostburg State University
Frostburg, MD

Bob Galvin, M.S.
Vermont State Director
Animal Wellness Action
Richmond, VT

M. Hildegard Reiser, PhD
M.S. Wildlife Ecology, University of Wisconsin-Madison
Ph.D. Zoology, Northern Arizona University
Wildlife Ecologist
Retired
Loveland, CO