

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](mailto: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