

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,



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The Honorable Mark Greenblatt  
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The Honorable Senator Tom Carper  
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