

May 20, 2016

Implement the Endangered Species Act Using the Best Available Science

To: Secretary Sally Jewell and Secretary Penny Prtizker

We, the under-signed scientists, recommend the U.S. government place species conservation policy on firmer scientific footing by following the procedure described below for using the best available science.

A recent survey finds that substantial numbers of scientists at the U.S. Fish and Wildlife Service (FWS) and the National Oceanic and Atmospheric Administration believe that political influence at their agency is too high.ⁱ Further, recent species listing and delisting decisions appear misaligned with scientific understanding.^{ii,iii,iv,v,vi} For example, in its nationwide delisting decision for gray wolves in 2013, the FWS internal review failed the best science test when reviewed by an independent peer-review panel.^{vii} Just last year, a FWS decision not to list the wolverine ran counter to the opinions of agency and external scientists.^{viii}

We ask that the Departments of the Interior and Commerce make determinations under the Endangered Species Act^{ix} only after they make public the independent recommendations from the scientific community, based on the best available science.

The best available science comes from independent scientists with relevant expertise who are able to evaluate and synthesize the available science, and adhere to standards of peer-review and full conflict-of-interest disclosure.

We ask that agency scientific recommendations be developed with external review by independent scientific experts. There are several mechanisms by which this can happen; however, of greatest importance is that an independent, external, and transparent science-based process is applied consistently to both listing and delisting decisions.

While other factors can enter into implementation of the Endangered Species Act, listing and delisting decisions are required by law to be based on the best available science.

Sincerely,
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ⁱ Union of Concerned Scientists. 2015. *Progress and Problems: Government Scientists Report on Scientific Integrity at Four Agencies*. Washington, DC. Online at <http://www.ucsusa.org/scientistsurvey>, accessed October 14, 2015.

ⁱⁱ Bergstrom, et al. (2009). "The Northern Rocky Mountain gray wolf is not yet recovered." *BioScience* 59: 991-999

ⁱⁱⁱ Bruskotter, et al. (2013). "Removing protections for wolves and the future of the U.S. Endangered Species Act (1973)" *Conservation Letters* 7: 401-407.

^{iv} Treves, et al.(2015). "Predators and the public trust." *Biological Reviews*.

^v Treves, et al. (2014). Letter to the USFWS describing concerns about use of the best available science in the State of Wisconsin's post-delisting monitoring report on gray wolves. <http://faculty.nelson.wisc.edu/treves/>.

^{vi} Vucetich et al. (2006). "The Normative Dimension and Legal Meaning of Endangered and Recovery in the U.S. Endangered Species Act" *Conservation Biology* 20(5): 1383-1390.

^{vii} NCEAS (2014). Review of Proposed Rule Regarding Status of the Wolf Under the Endangered Species Act, National Center for Ecological Analysis and Synthesis.

^{viii} Sahagun. "Fish and Wildlife drops proposal to list wolverine as threatened." *Los Angeles Times*, August 14, 2014. Link: <http://www.latimes.com/science/la-na-wolverine-20140813-story.html>.

^{ix} (6 U.S.C. § 1531 as amended PL. 108-136, November 24, 2003) Sec. 4(b)(1)(A) The Secretary shall make determinations required by subsection (a)(1) solely on the basis of the best scientific and commercial data available to him after conducting a review of the status of the species and after taking into account those efforts, if any, being made by any State or foreign nation, or any political subdivision of a State or foreign nation, to protect such species, whether by predator control, protection of habitat and food supply, or other conservation practices, within any area under its jurisdiction, or on the high seas.

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