Union of Concerned Scientists
Citizens and Scientists for Environmental Solutions

PEER

Representative Henry A. Waxman
2204 Rayburn House Office Building
Washington, DC 20515

Representative Nick Rahall
2307 Rayburn House Office Building
Washington, DC 20515

February 9, 2005

Dear Representatives Waxman and Rahall:

We are writing you on behalf of the Union of Concerned Scientists (UCS) and Public Employees for Environmental Responsibility (PEER) because of your demonstrated interest in documenting cases where public scientists are under political pressure to change results or recommendations within federal agencies. Recently, UCS and PEER distributed a survey to more than 1,400 biologists, ecologists, botanists and other science professionals working in U.S. Fish and Wildlife Service (USFWS) field offices across the country. The 42-question survey included questions regarding scientific integrity, political interference, resources and morale. We received responses from over 400 employees, nearly a 30% response rate.

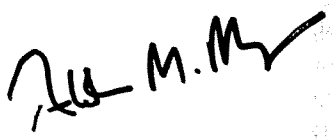
The survey results show that political intervention to alter scientific results has become pervasive within USFWS. As a consequence, endangered and threatened wildlife are not being protected as intended by the Endangered Species Act. For example, nearly half of all respondents whose work is related to endangered species scientific findings (44%) reported that they "have been directed, for non-scientific reasons, to refrain from making jeopardy or other findings that are protective of species." Also, one in five agency scientists revealed they have been instructed to compromise their scientific integrity—reporting that they have been "directed to inappropriately exclude or alter technical information from a USFWS scientific document."

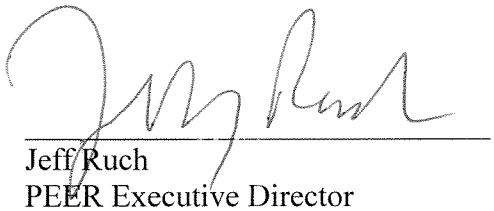
In essays submitted on the topic of how to improve the integrity of scientific work at USFWS, one biologist wrote, "We are not allowed to be honest and forthright, we are expected to rubber stamp everything. I have 20 years of federal service in this and this is the worst it has ever been." By far, the most frequent concern raised by the scientists in the written responses was political interference.

The mission of the Service to protect and conserve species and habitats is being threatened by attacks on science from USFWS and Department of Interior personnel. According to these survey results, the situation is getting worse.

We have attached a full set of survey results for your review.

Sincerely,





Alden Meyer
UCS Director of Strategy and Policy

Jeff Ruch
PEER Executive Director

Attachments

Union of Concerned Scientists
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Survey of U.S. Fish and Wildlife Service Ecological Services Employees

Note: A certain percentage of responses for most questions were left blank. These figures are not included below causing, in many cases, the percentages listed to equal less than 100%.

RESOURCES

1. USFWS Ecological Services has sufficient resources to adequately perform its environmental mission.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
1.2%	4.8%	1.9%	40.3%	51.4%

2. My office efficiently uses the resources available to it.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
15.0%	45.7%	7.7%	22.9%	8.5%

3. Based on the program's role in fulfilling the mission of Ecological Services, for each program listed below indicate whether the resource allocation is: *excessive*, *adequate*, *inadequate* or *don't know*.

a. Endangered Species Act

excessive *adequate* *inadequate* *don't know*

overall			
1.2%	10.6%	84.8%	3.1%

b. Partners for Wildlife

excessive *adequate* *inadequate* *don't know*

overall			
1.9%	29.0%	41.5%	27.1%

c. Section 404 Clean Water Act

excessive *adequate* *inadequate* *don't know*

overall			
0%	11.4%	60.6%	28.0%

d. FWCA

☐ *excessive* ☐ *adequate* ☐ *inadequate* ☐ *don't know*

overall			
0.2%	18.8%	44.0%	36.5%

e. NEPA

☐ *excessive* ☐ *adequate* ☐ *inadequate* ☐ *don't know*

overall			
0.7%	21.0%	48.6%	29.2%

f. Contaminants

☐ *excessive* ☐ *adequate* ☐ *inadequate* ☐ *don't know*

overall			
1.7%	10.9%	60.6%	26.6%

PROFESSIONALISM

4. I feel free to openly collaborate with my scientific colleagues employed in academia or other public agencies on species and habitat issues.

☐ *strongly agree* ☐ *agree* ☐ *don't know* ☐ *disagree* ☐ *strongly disagree*

overall				
25.6%	57.0%	1.7%	10.1%	4.3%

5. I am afforded appropriate time and resources to keep up with advances in my profession.

☐ *strongly agree* ☐ *agree* ☐ *don't know* ☐ *disagree* ☐ *strongly disagree*

overall				
3.4%	33.3%	2.2%	44.2%	16.2%

6. I am allowed to publish work in peer-reviewed scientific journals regardless of whether it adheres to agency policies and positions.

☐ *strongly agree* ☐ *agree* ☐ *don't know* ☐ *disagree* ☐ *strongly disagree*

overall				
0.7%	20.0%	53.9%	16.9%	7.0%

7. I am encouraged to actively participate in scientific professional societies and organizations.

☐ *strongly agree* ☐ *agree* ☐ *don't know* ☐ *disagree* ☐ *strongly disagree*

overall				
6.0%	50.2%	5.8%	30.7%	6.0%

8. I respect the integrity and professionalism of USFWS decision makers.

□ *strongly agree* □ *agree* □ *don't know* □ *disagree* □ *strongly disagree*

overall				
0.5%	32.6%	9.4%	36.0%	18.6%

CLIMATE

9. I work in an environment of mutual trust and respect.

□ *strongly agree* □ *agree* □ *don't know* □ *disagree* □ *strongly disagree*

overall				
8.0%	48.1%	2.7%	27.1%	12.1%

10. I feel that I am allowed to do my job as a scientist.

□ *strongly agree* □ *agree* □ *don't know* □ *disagree* □ *strongly disagree*

overall				
6.8%	56.8%	3.6%	22.0%	9.9%

11. Within the agency I can openly express my concerns about the biological needs of species and habitats without fear of retaliation.

□ *strongly agree* □ *agree* □ *don't know* □ *disagree* □ *strongly disagree*

overall				
12.6%	49.0%	7.5%	18.1%	11.6%

12. Outside the agency I can openly express my concerns about the biological needs of species and habitats without fear of retaliation.

□ *strongly agree* □ *agree* □ *don't know* □ *disagree* □ *strongly disagree*

overall				
5.6%	38.4%	13.0%	29.2%	12.8%

MISSION

13. USFWS fosters a work place ethic consistent with the agency's mission to "conserve, protect and enhance fish and wildlife and their habitats for the continuing benefit of the American people."

□ *strongly agree* □ *agree* □ *don't know* □ *disagree* □ *strongly disagrees*

overall				
7.7%	44.9%	6.0%	29.7%	9.9%

14. USFWS Ecological Services is acting effectively to maintain or enhance species and their habitats, so as to avoid possible listings under the Endangered Species Act.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
1.9%	13.3%	9.2%	52.2%	22.9%

15. USFWS Ecological Services is effectively accomplishing efforts toward recovery of Endangered Species Act listed species.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
1.2%	19.1%	10.1%	48.3%	20.5%

16. In my opinion, USFWS Ecological Services is moving in the right direction.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
0.7%	21.0%	12.8%	44.0%	20.3%

MANAGEMENT

17. I trust USFWS decision makers to make decisions that will protect species and habitats.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
0.5%	20.0%	10.6%	37.7%	29.7%

18. Scientific input from Ecological Services research staff receives appropriate consideration in decisions regarding protection of species and habitats.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
3.1%	23.2%	19.3%	33.8%	18.1%

19. My Regional Directorate will stand up for scientific staff or supervisors who take controversial stands.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
2.2%	17.6%	25.6%	30.0%	23.4%

20. My office supervisor will stand up for scientific staff who take controversial stands.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
13.3%	43.0%	13.0%	14.5%	14.7%

CANDOR

21. USFWS routinely provides complete and accurate information to the public on ESA issues.

☐ *strongly agree* ☐ *agree* ☐ *don't know* ☐ *disagree* ☐ *strongly disagree*

overall				
6.5%	42.5%	19.8%	23.2%	7.5%

22. USFWS technical information is easily accessible to interested members of the public.

☐ *strongly agree* ☐ *agree* ☐ *don't know* ☐ *disagree* ☐ *strongly disagree*

overall				
4.1%	48.3%	22.2%	21.3%	3.4%

23. I have been directed by USFWS decision makers to provide incomplete, inaccurate or misleading information to the public, media or elected officials.

☐ *frequently* ☐ *occasionally* ☐ *seldom* ☐ *never* ☐ *not applicable*

overall				
1.4%	7.7%	9.4%	68.1%	11.8%

SCIENTIFIC INTEGRITY.

24. In my experience, scientific documents generally reflect technically rigorous evaluations of impacts to listed species and associated habitats.

☐ *strongly agree* ☐ *agree* ☐ *don't know* ☐ *disagree* ☐ *strongly disagree*

overall				
7.5%	54.3%	13.8%	18.1%	4.3%

25. USFWS strives to substantially incorporate independent peer review in formulating and validating scientific findings.

☐ *strongly agree* ☐ *agree* ☐ *don't know* ☐ *disagree* ☐ *strongly disagree*

overall				
7.7%	52.2%	16.4%	18.8%	3.6%

26. I have been directed to inappropriately exclude or alter technical information from a USFWS scientific document.

☐ *frequently* ☐ *occasionally* ☐ *seldom* ☐ *never* ☐ *not applicable*

overall				
2.2%	8.9%	9.2%	68.8%	10.4%

27. I have been directed, for non-scientific reasons, to refrain from making jeopardy or other findings that are protective of species.

frequently *occasionally* *seldom* *never* *not applicable*

overall				
3.6%	14.0%	13.3%	39.4%	29.2%

28. As a norm, USFWS scientific documents and reports rely upon the best available science.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
15.0%	60.1%	9.2%	11.6%	2.9%

POLITICAL INFLUENCE

29. I know of cases where U.S. Department of Interior political appointees have injected themselves into Ecological Services determinations.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
43.2%	30.0%	22.9%	2.7%	0.5%

30. I know of cases where political appointees from other federal departments or agencies (for example, OMB, CEQ, USDA, DOD) have injected themselves into Ecological Services determinations.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
21.3%	21.0%	51.0%	5.3%	0.7%

31. I know of cases where members of Congress have injected themselves into Ecological Services determinations.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
26.3%	28.0%	40.3%	3.9%	0.7 %

32. I know of cases where state, tribal or local governments/elected officials have injected themselves into Ecological Services determinations.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
23.7%	31.9%	37.0%	6.3%	0.5 %

33. I know of cases where commercial interests have inappropriately induced the reversal or withdrawal of USFWS scientific conclusions or decisions through political intervention.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
25.4%	30.9%	36.2%	5.6%	1.0%

34. Political influence on Ecological Services determinations is balanced between influence from commercial/economic interests and influence from environmental/conservation interests.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
3.9%	18.8%	21.3%	32.9%	21.7%

JOB SATISFACTION

35. I would recommend that young scientists consider USFWS Ecological Services as a career.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
14.3%	45.7%	9.7%	21.3%	7.7%

36. My personal job satisfaction at Ecological Services has increased over the past few years.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
4.3%	25.1%	7.5%	36.7%	24.4%

37. I feel that Ecological Services values my professional expertise and applies it to achieve the greatest scientific benefit to agency decisions.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
6.3%	47.6%	9.7%	23.4%	12.1%

38. Ecological Services offers opportunity for advancement based on scientific expertise, not just on administrative and supervisory expertise.

strongly agree *agree* *don't know* *disagree* *strongly disagree*

overall				
0.5%	22.0%	3.9%	29.7%	10.1%

NOTE: 32.8% of responses to this question were blank due to an error in the survey document – no answer choices.

39. Morale within Ecological Services is:

excellent	*good*	*fair*	*poor*	*extremely poor*	*don't know*
overall					
0.5%	11.6%	34.5%	30.4%	19.6%	1.4%

40. My current position at USFWS is:

Management/Supervisory	*Non-Supervisory/Staff*
overall	
18.8%	79.2%

41. My current grade level is:

7	*9-12*	*13-15*
overall		
1.7%	80.0%	16.2%

42. The integrity of the scientific work produced by USFWS Ecological Services could best be improved by:

Essay Response	No Response
overall	
66.9%	33.1%

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2005 USFWS Ecological Services Survey
Selected Essays

This is a sample of some of the most compelling or representative answers from each region to the following survey question:

42. *The integrity of the scientific work produced by USFWS Ecological Services could best be improved by:*

The essay responses are sorted according to topic, in order of frequency. Each response is preceded by a code indicating the region of the particular respondent. Sixty-seven percent of survey respondents provided written responses.

REGION 1 (Pacific: CA, NV, ID, OR, WA, HI)
REGION 2 (Southwest: AZ, NM, TX, OK)
REGION 3 (Great Lakes – Big Rivers: MN, IA, IL, IN, WI, MI, OH, MO)
REGION 4 (Southeast: GA, AL, AR, FL, KY, LA, MS, TN, NC, SC, PR)
REGION 5 (Northeast: ME, DE, RI, NY, MD, NJ, WV, PA, VA, NH, MA, VT)
REGION 6 (Mountain-Prairie: CO, MT, KS, NE, ND, SD, UT, WY)
REGION 7 (Alaska)

I. Removing politics/political influence over scientific decisions
(Mentioned by 32% of all survey respondents)

R1
Removal of Julie McDonald from Dept of Interior. I have never before seen the boldness of intimidation demonstrated by a single political appointee. She has modified the behavior of the entire agency.
I believe there should be a thorough investigation of her abuse of discretionary authority and modification of science information provided in FWS documents.

R1
The biological determinations of the field offices should not be ignored and overridden by non-biologists in the Interior. If they must override field office biological determinations they should do so early in the process rather than at the last minute.

R1
Exposing interference at the department level (Julie MacDonald).

R1
I have been through the reversal of two listing decisions due to political pressure. Science was ignored- and worse manipulated to build a bogus set of rationale for reversal of these listing decisions/ I have very little hope for any improvement- and I fear that the current trend of political meddling will only worsen in the next four years.

R1
I have never seen so many findings and recommendations by the field be turned around at the regional and Washington level. All we can do at the field level is ensure that our administrative record is complete and hope we get sued by an environmental or conservation organization.

R1
Removing the politics from supposed "scientifically-based" decisions. At least tell the public the decisions are based on policy and don't try to hide behind science.

R1
Remove politics from the process. Everyone is afraid to make any decisions or conduct any action that would be viewed as controversial. Biologists on the bottom just try to keep their heads down and stay out of trouble. They have absolutely no power. All they can do is write memos to the files defending their positions that only come to light if the files get FOIA'd. The process really is broken, but not in the ways discussed by politicians and the press.

R1
Dept of Interior is making substantial changes to the Ecological Services related decision with no scientific analysis or basis.

R1
If the DOI would allow FWS to determine or resolve issues using scientific and other information, without interference during the development of studies and documents. There are a number of cases in Region 1 where DOI managers such as Manson have called biologists in the field offices or even at home to question work, thus avoiding the entire FWS structure and process.

R1
Reducing or eliminating interference from DOI political appointees (Craig Manson, etc.) and their special assistants (especially Julie MacDonald).

R1
It appears that at the DOI level, politics comes into place and sometimes trumps science.

R2
Decreasing political influence including the pressure and willingness of upper and mid-level managers to respond to it.

R2
Keeping it scientific and biological when the decisions require it. Biological opinions are supposed to be based on biology, not political expediency or [bowing] to some user group.

R2
Getting rid of Julie McDonald.

R2
Providing rigorous documentation of scientific decisions is already required. I wish managers would provide similar documentation, (phone records, and memos to file) of those when marching orders are given by a member of congress, an appointee, an RD etc. In other words, it should be documented when a scientific process is usurped by political considerations.

R3
Political influence has been moving downward ever since [the Carter Administration] and it is a corrosive, negative force on environmental agencies.

R4
Field offices have highly qualified biologists who can make decisions and findings about species and habitats based on sound science. These findings are based on biological and ecological needs of the species and are but one facet to be considered in making a final decision. Wildlife laws have provisions and procedures for considering non-biological issues. Bottom line: Let ES biologists do their jobs; then incorporate their findings in the decision-making process as provided for in federal laws. Don't short cut around established procedures.

R4
Making decisions based upon actual science and true effects to listed species after a full, complete and rigorous analysis of project impacts. Findings need to be based upon biology and ecology, not what is politically acceptable or tolerable to the applicants, politicians, developers and public.

R4
Taking the politics out of the scientific decision making process; taking the fear and career intimidation off the backs of the biologists; promoting professionalism and integrity among the scientists.

R5
Keeping science and politics totally separate. Why can't we be honest when science points in one direction but political reality results in USFWS making a decision to do otherwise? Morale and credibility will improve if we are honest rather than trying to twist science to make politicians happy.

R5
A top-down emphasis put on quality science (and the willingness to listen to it!). As it stands, FWS regional HQ, DOI and White House leadership are so hostile to our mission that they will subvert, spin or even illegitimize our findings. Without changing the leadership, having this discussion is probably futile.

R5
Having regional office and Washington office staff who have the courage and integrity to stand up to political pressure and commercial/business interests. It is at this level that scientific/biological determinations by field staff are not supported or are over-turned. Contrary to what the administration says – the issue is not peer review or failure to use "good science." The "goodness" of our science is only questioned when it yields an answer that is in conflict with a commercial or political interest.

R6
Conclusions drawn by Field Office; scientifically sound and based on best scientific data available; must be supported by [Regional Office] and [Washington Office], not patently dismissed due to inconvenience and inconsistency with current political whims.

R6
Non-interference with political appointees, from our national directorate to DOI and CEQ. Our agency does an excellent and scientific and protective job to the best of its ability given political intervention and public indifference.

R6
Reducing the direct intervention by Department of the Interior political Appointees who often overturn the findings of scientific documents and replace them with political determinations.

R7
I have been and continue to be proud of the job the USFW does with respect to conserving fish and wildlife. The clear problem is with this Administration's political appointees. Recently, DOI officials have forced changes in Service documents, and worse, they have forced upper-level mangers to say things that are incorrect and not reflective of the agency's view on an issue. This, I believe, goes too far. It's one thing for the Department to dismiss our recommendations, it's quite another to be forced (under veiled threat of removal) to say something that is counter our best professional judgment.

II. Increasing funding or resources
(Mentioned by 20% of all survey respondents)

R1
Several important projects have and are under funded. Good science takes time. More time requires more funding. Additional staff can improve time deadlines-more staff requires more funding. The balance between a well done project and making a deadline is funding.

R1
We are also terribly under funded by the Bush Administration. We are putting out fires and have no funds to do the real work of recovery, implementing recovery actions or doing proactive conservation.

R1
Funding needs to be increased drastically; not cut. And you can't recover species we don't invest some serious dollars into recovery and reduce some of the threats.

R1
More resources and staff, we are overworked which leads to poor morale and poor work performance. The resources are suffering because ES can't do the job adequately.

R2
Increase funding for all ES activities, but especially those less popular with special interests, including ESA, see 404 CWA and Environmental Contaminants.

R2
Better funding, filling vacancies, money to obtain peer review.

R3
Filling positions vacated in the past four years. The work load is the same or greater, but there are fewer people due to budget cuts.

R4
Additional Staff to allow more in depth study on individual projects consultations. Workload is so heavy that decisions must be made without complete review of information.

R4
Increase staffing levels. Instead of two people covering 32 counties, at least double that so four folks could cover 8 counties. More staff = more proactive work at county level before more land clearing starts.

R5
More discretionary funding to contract for targeted or focused scientific studies. The money is needed early, when the issue concern is first identified, not later when it has reached crisis stage or we are facing litigation.

R7
Resources to use modern tools for managing and retrieving/analyzing information – GIS, databases, computer-assisted modeling of populations.

III. Improving the quality of FWS management
(Mentioned by 10% of all survey respondents)

R1
I think the service is being set up for a fall that is now being directed from within. Reduced funding for "white hot" programs (Partners, Jobs in the Woods), management changes to proposed recovery plans to make ESA look like a terrible program, and agreement by new appointees that "ESA should be changed".

R1
Hiring properly trained supervisors who have a background in species conservation as well as business administration and supervision.

R2
The Texas [USFWS] state Admin is commonly referred to by the staff as Dr. Evil; his underling is Minnie Me: No integrity or leadership.

R2
In region 2, the regional director is more a tuned with the Cattle Growers Association than his own ES biologists.

R2
After 4 years they have selected managers who will parrot their beliefs as a result with few exceptions the entire echelon of FWS are not advocates for the fish and wildlife.

R4
I believe that the real problem with the agency lies with upper level management. Most of the time the fundamental science used to formulate biological opinions is sound and the lead biologist submit a quality product to the supervisor. Upper level management then buckles under political pressure and the recommendations/biological opinion initially submitted is revised and watered down to all the permit to be granted.

R6
Reduce layers of management. We could trim one-fourth to one-third of the Washington and Regional office staffs and have absolutely no negative effect on the biological work of the agency. Management used to exist to serve the field staff, but this has reversed in the past 5-10 years. They take the money, we do the work, they make decisions regardless of what our data show.

R7
There is a culture of fear of retaliation in mid-level management. If the manager were to speak out for resources, they fear loss of jobs or funding for their programs. (So they go into "duck&cover" mode and wait for the politics to change.)

IV. Devoting more attention to professional development
(Mentioned by 8% of all survey respondents)

R1
More time to do research and more time to attend scientific meetings. More time to publish; now I can't do anything but crank out biological opinions.

R1
Allowing biologists time to keep up with the scientific advances in the field and time to use scientific techniques in conducting their work.

R1
Assuring that ES staff are given opportunities to receive appropriate training, attend scientific conventions and participate in or conduct science research.

R2
Greater staffing levels would allow more training, more time to keep up with literature and more time spent producing quality products. I have a stack of literature 18" high that needs to be logged, read and filed!

R3
Encouraging scientists to keep abreast of scientific information (e.g. Membership in professional societies, pay for them to attend prof meetings.) and allowing scientists to do their job-make sure they can focus on getting the science right before they are bombarded with the social, political and economic angles that come with each issue.

R3
Encouraging participation actively in professional societies (we currently have no resources for this and must do it at our own time and expense). Reinstating our training budget, this is now laughably small. We are priced out of most technical training, unless we do it at our own time/expense, providing access to current scientific journals (hard to do now unless there is a large university in town).

R4
More support from agency staff to participate and interact with professionals, organizations, agency researchers, and university researchers.

R4
Scientific and policy documents can not keep pace with the barrage of impacts. Therefore, biologists spend almost all of their time fulfilling permit applications and have no time to monitor whether or not recommendations or requirements are implemented. This disparity means that true impacts to species are not fully understood by biologists.

V. Restoring the conservation ethic to FWS
(Mentioned by 8% of all survey respondents)

R1
I am discouraged that no matter what the project, somehow we will ok it. We have to. We cannot stop a project.

R1
FWS could actually follow the law and implement regulations. Stop making excuses to the public, developers and politicians for doing their job.

R1
Emphasizing habitat needs for fish and wildlife above partnering or political agenda. The USFWS can be proud of its history and those leaders who shaped the high standards on refuges, migratory protection and development of the ESA. The service needs to proudly defend the existing FWS institutions and Acts and continue to recover habitat.

R1
It is the unwillingness of decisions makers to do the right thing for the resource. At the field level, my supervisor is faithful to the resources but is frequently told to back off from the regional office and DC.

R1
Reducing retaliatory reprisals from management for doing complete assessments.

R1
Full support by immediate supervisors and management to "err on the side of the resources" rather than with the project proposals.

R2
We need to get back to being advocates for the fish and wildlife resources, not advocates of development and big industry.

R4
Starting at the executive office and working downwards electing/appointing decision makers with a commitment to conservation ethic and support for endangered species recovery.

R4
More backbone and less dog and pony show-more on the ground action.

R5
Using the precautionary principle as the norm rather than having the burden of proof lie with the resource agency.

VI. Increasing the transparency of scientific decisions
(Mentioned by 4% of all survey respondents)

R1
Allowing the science basis for decisions to be clear and available to the public.

R1
Please look closely at what is happening to the Recovery Implementation money. In our office about one tenth of the money makes it to the Recovery Branch and about one quarter of that makes it to recovery implementation.- in spite of the fact that contracts are lined up for spending the money on recovery. Where does the rest of the money go? Is this happening in other offices?

R1
We are also often at the mercy of peer-reviewed academic science, which generally sucks.

R1
Improved use of external peer review.

R1
Internal steps to increase peer review and transparency in general.

R2
Quit giving lip service to peer review and working with others- start doing it.

R5
Allowing the science to speak for itself and be available to the public.

R6
FOIA, FOIA, FOIA! Keep our agency honest through whatever means available.

VII. Restoring the research arm to FWS (now with USGS)
(Mentioned by 4% of all survey respondents)

R1
Return of Biological Research Branch to the USFWS (away from the USGS).

R3
Give us back our research arm! USGS-BRD should be part of USFWS so that we can better integrate applied needs in the field with the research expertise of scientists who do research full-time.

VIII. Decreasing control of contractors and client agencies over scientific conclusions (Mentioned by 2% of all survey respondents)

R1
By having our entire budget come directly to the Service and not through another agency such as BOR. When parts of our budget come through BOR (Bureau of Reclamation) the only items that receive attention are those of interest to BOR and their political friends.

R7
Not vetting comment letters (drafts) before the state, private industry, other agencies – asking for their input and then changing our letter to suit their needs.

IX. Creating a career ladder for agency scientists (Mentioned by 2% of all survey respondents)

R1
Develop a two track structure at FWS:

One track is management and administration.
One track is science analysis.

The scientific track analyzes the environmental and biological issues and stays current with the science literature and perspectives. The admin track deals with policy. Both tracks would write independent final analyses that are part of the admin record.

R1
Create an advancement path based on scientific research.

R6
Currently, hiring and promotions are based on one's knowledge in law and policy. Little consideration is given to level of education or publication history. This is evident as Bachelor of Science graduates fill high ranking positions. This failure is occurring at the Directorate level where one Regional Director does not have a scientific background and it is evident in her lack of support for her agency's mission.

X. Expanding use of partnerships (Mentioned by 1% of all survey respondents)

R2
Most importantly, the Partners for Fish and Wildlife program is the only way to affect listed and declining species on private lands. This program is severely under funded and still too focused on waterfowl and wetlands. This program is the only way to "shelter" recovery money from litigious [Habitat Conservation Plan] suits, etc.

XI. Settling or changing the role of lawsuits
(Mentioned by 1% of all survey respondents)

R1
If the environmental groups stopped suing us and imposing ridiculous timeframes to make listing and critical habitat determinations. We are not given enough time or funding to evaluate and make scientific decisions because of court determined deadlines which, is counter productive to the environmentalist goals of protecting species.

R1
Getting back to the spirit of the ESA rather than being paralyzed by the process of ESA. (For example, the recovery work is insignificant compared to the amount of time and money used to defend lawsuits.)

R4
Not having the workload be directed by litigations.

Miscellaneous

R1
Ecological Services doesn't produce scientific work. Opinions are not based on science/data. Millions of dollars are wasted yearly on well-intentions but poorly designed/implemented/analyzed projects that don't get us information or recover species. Supervisors need to know they are tasking staff with things they can't do. This also leads to poorly conducted contract work. Because staff are simply not trained in experimental design and estimation of techniques.

R4
More LE and ESA, fills, contaminants, water quality issues. Greater cooperation by the EPA and state environmental quality division. The EPA is totally uncooperative in CWA; state division is probably the worst in the nation.

R4
Consistent and accountable application of funds.

R4
Stopping the USFWS from raising and stocking exotic species, particularly fish.

R4
Undergrad and Grad schools need to offer Ethics courses.

R6
Get us real whistleblower protection through Congress.

R6
Require annual training of staff level biologists on “scientific principle.” Now, training is “optional” and most ES training courses emphasize process.

R6
Hiring younger biologists who have more advanced degree and more modern skills.

R7
For endangered species program: Making designation of critical habitat optional (not mandatory) thus decreasing multitudinous lawsuits.

R7
Training in decision-making processes that recognize scientific uncertainty. Biologists trained to evaluate discrete issues using standard statistical approaches are ill-equipped to deal with complex issues for which too little information is available.

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