

Noreen Walsh

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Mrs. Walsh,

I was recently contacted by the United States Fish and Wildlife Service (USFWS) inviting me to participate in an assessment of risks to endangered American burying beetle (ABB) populations due to cropland conversion in Nebraska and South Dakota. While this seemed like a worthwhile endeavor, I was ultimately alarmed at the unsound science and poor ethics that I witnessed. I want you to be aware of the situation prior to making decisions that will impact ABB conservation.

I published a peer-reviewed paper with Dr. Wyatt Hoback last year that included a predictive model of ABB occurrences in Nebraska (Leasure & Hoback 2017, Journal of Insect Conservation). USFWS contacted Dr. Hoback and myself on 19 December 2017 asking for our participation in a cropland risk assessment that would use our model to represent ABB habitat. It was described as a collaborative process that would end with the publication of a peer-reviewed manuscript that Dr. Hoback and myself would lead. That is not what happened.

By 18 January 2018, USFWS had finalized a report concluding that ABB were not at risk from agricultural conversion. This is a conclusion that Dr. Hoback and myself strongly disagreed with. Neither of us were willing to put our name on the report because A) reasonable concerns from experienced ABB biologists were being ignored, B) an utterly irresponsible timeline was imposed, and C) the methods used by USFWS were opaque and misleading. The report could have never passed a reasonable peer-review process. It was unanimously opposed by the four experienced ABB biologists that were involved. Those objections were largely ignored and the ABB experts were ultimately dismissed from the process.

I provided my data (model predictions) to USFWS on 21 December 2017. I saw the first draft of the report on 9 January 2018. There were clearly shortcomings in how the analysis was conducted and the conclusions that were reached, but at that point, Dr. Hoback and I were both engaged in trying to resolve the issues. On 13 January 2018, I began to raise major concerns via emails with USFWS about the cropland conversion model they used. I asked for specific information that would have been required in any reasonable peer-review process, such as a write-up of their methods and an evaluation of their model's predictive accuracy in Nebraska where we were applying it.

USFWS did not respond until 16 January 2018. They provided misleading and conflicting information about how (or even if) the cropland conversion model was evaluated in Nebraska. The diagnostic data they provided initially were from a completely different state. This raised red flags and so I insisted on a write-up of the methods and evaluation of model performance in our study area. At this point, we were only given a single day to resolve these issues, so I decided that I could no longer be involved in the project. I offered to remain involved if more time was available.

I was removed from the project on 16 January 2018. I was not given any more chances to see the documents, despite asking for them. I asked for confirmation that my name would not be on

the report (I was listed as the lead author on a draft). I never received confirmation that my name was not being used to justify the report. I asked them not to use my data because I was very uncomfortable with their methods. They told me that I have no control over how they use my data. That is unethical. They plagiarized my writing in their report. They copied word-for-word from Leasure and Hoback (2017), even after removing us both from the report. That is also clearly unethical.

This entire process played out over a period of only 18 federal workdays. Given the sweeping conclusion in the report that ABB are not vulnerable to agricultural conversion, I suspect the report may be used to justify a down-listing decision and potentially issue a 4(d) rule to exempt agricultural activities from ABB-related regulations. This would be a shocking development because agricultural conversion was a primary factor that drove the species to the brink of extinction in the first place. Any reasonable and objective observer would agree that 18 federal workdays (from first contact to final report) is not enough time to make a well-informed decision. A reasonable observer would agree that a single day is not enough time to address serious methodological concerns being raised by 100% of the ABB biologists involved in the process. A reasonable observer would be concerned that the subject matter experts were dismissed from the process after raising objections.

I would like to highlight three facts:

1. None of the USFWS staff leading this effort had any experience with American burying beetles,
2. 100% of the American burying beetle experts that were involved voiced their opposition to the methods and conclusions, and
3. USFWS ignored those concerns and concluded that agricultural conversion does not present a risk to this endangered species even though the broad scientific consensus has been that agricultural conversion played a central role in the loss of this species from most of its historic range.

I am writing because I am concerned about potentially ill-informed decisions being made regarding American burying beetle conservation, and I am even more concerned that USFWS would endorse such poor-quality scientific processes and unethical behavior. I worry that this may be part of a larger trend of careless deregulation by USFWS despite clear objections from subject matter experts. I plan to submit this letter along with a more detailed scientific critique to the Federal Register during the public comment period for any decisions related to this process.

Sincerely,

Douglas R. Leasure, PhD.

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