



49651 Shenandoah Circle, Canton, MI 48187
www.attorneysforanimals.org

January 11, 2022

Hon. Debbie Stabenow
United States Senate

Via email: Terry Campbell, Terry_Campbell@stabenow.senate.gov

Re: Opposition to Confirmation of Martha Williams as Director of the United States Fish and Wildlife Service

Dear Sen. Stabenow:

Attorneys for Animals, Inc. (AFA) is a Michigan nonprofit and 501(c)(3) organization of attorneys and animal advocates. I serve on behalf of AFA as the Animal Advocacy member of the Michigan Wolf Management Advisory Councilⁱ. The AFA board of directors voted to oppose the nomination of Ms. Williams to be director of the US Fish and Wildlife Service.

Her nomination is before the Environment and Public Works Committee and will be considered on January 12, 2022.

The board firmly believes that she is the wrong person to head the agency at this crucial time. Our decision is based on:

- certain policy decisions during her tenure in the previous administration and as acting director in the current administration:
 - defending the de-listing of gray wolves from Endangered Species Act protections and turning their management over to states
 - overseeing the largest expansion of hunting and fishing on federal lands in recent history, defending it as providing “quality outdoor recreation experiences to the American people”ⁱⁱ, ignoring that only a small percentage of “American people” actually hunt and fish
- her approach to the USFWS role *vis a vis* state management, that the USFWS defers to states in wildlife management; we find this troubling with respect to gray wolves and species such as grizzly bears, in the face of mounting evidence that the states are not capable of using sound science over political expediencyⁱⁱⁱ

- the fact she lacks the required background for the position in violation of the law which states: "The Director of the United States Fish and Wildlife Service shall be appointed by the President, by and with the advice and consent of the Senate. No 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."^{iv}. Ms. Williams is a lawyer and lacks the scientific education credentials required by law.

We ask that you consider our concerns in your deliberations and that you oppose her nomination.

Very Truly Yours,



Beatrice M. Friedlander, JD
President, Board of Directors

ⁱ MCL §324.43540e, <http://legislature.mi.gov/doc.aspx?mcl-324-43540e>

ⁱⁱ <https://www.doi.gov/pressreleases/interior-department-announces-largest-expansion-fishing-and-hunting-us-fish-and>, US Department of the Interior Press Release, 8/30/2021

ⁱⁱⁱ "However, the challenge this poses could instead be an opportunity to encourage states, municipalities, and private parties to establish robust conservation strategies with concrete agreements in place to prevent the need for listing a species ... in the first place," Martha Williams, *Lessons From the Wolf Wars: Recovery v. Delisting Under the Endangered Species Act**, 27 Fordham Envtl. L. Rev. 106 (2015), <https://ir.lawnet.fordham.edu/elr/vol27/iss1/3>; her recent decision to defend the gray wolf de-listing decision indicates an adherence to the unrealistic notion that states can be "encouraged" to protect species such as the gray wolf

^{iv} 16 U.S. Code § 742(b)