



Public Employees for Environmental Responsibility

2000 P Street, NW, Suite 240 • Washington, DC 20036

Phone: (202) 265-PEER • Fax: (202) 265-4192

Email: info@peer.org • Web: <http://www.peer.org>

September 28, 2015

Dear Ms. Kendall,

We received your letter regarding our June 4, 2015 request that the IG review the USGS “management of scientific collections.” We are writing because certain statements in your letter suggest that you have misunderstood the nature of our request. We respectfully ask that you reconsider your decision, given the further clarifications contained herein.

Your letter references the “Department of the Interior’s museum collections” and the IG’s 2009 report reviewing other DOI agencies’ treatment of museum property. This suggests that you interpreted PEER’s request as referring only to the accountability and stewardship of USGS *museum property*. Our apologies for any miscommunication, but this was not the nature of our request.

The USGS maintains some museum property, but the fundamental problem is that the agency fails to properly define its biological and other scientific collections – the bulk of its collections, in fact – as “museum property” in the first place. So items that are, in fact, “museum property” are not treated as such and therefore do not receive appropriate management and funding under DOI mandates. The agency insists on calling these collections “working collections,” a term which implies no Federal mandates for long-term fiscal support or stewardship responsibility. Essentially, “working collections” can simply be disposed of after use or given away.

We believe that the agency knowingly refuses to categorize its biological and other scientific collections (current and new) as “museum property” to minimize stewardship and fiscal responsibility. This improper categorization enables USGS to routinely – although inappropriately – transfer scientific and biological collections to outside institutions without providing financial support, and skirt federal requirements for the proper management of federal collections.

For example, in 2012 the USGS donated a “working collection” of 2.5-million aquatic invertebrates to the University of Minnesota without providing compensation for packing or curation. More recently, although 97% of USGS museum property consists of a natural history collection in New Mexico, the 2014 USGS Museum Management Plan states that the agency will no longer allow new additions in order to “control growth of collections of accessioned museum property.”

The agency needs to justify why natural history has been singled out while cultural objects can continue to grow. *Until the OIG review is completed, we ask that you direct the USGS to immediately halt all current or pending actions that would turn over management of USGS collections to others. This includes, but is not limited to, a pending repository agreement with the University of New Mexico.*

We have attached our initial June 4, 2015 request for your reference, as well as a recent article from Bioscience that we encourage you to read for further clarification. We would be happy to arrange a phone call between your office and a subject matter expert if desired.

Sincerely,

/s/ Jeff Ruch
Executive Director

s/s Laura Dumais
Staff Counsel

Enclosures:

- (1) June 4, 2015 Request for IG Review by PEER
- (2) Ramotnik, C.A. 2015. "USGS and the Illusion of Responsibility." *Bioscience* 65(4):344-345.