



# The Rewilding Institute

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August 06, 2008

Dr. Benjamin Tuggle  
Regional Director  
U.S. Fish and Wildlife Service  
500 Gold Avenue SW  
Albuquerque, NM 87102

Dear Dr. Tuggle,

This letter addresses your recent op-ed on the Mexican gray wolf reintroduction program that appeared in the *Arizona Republic* on July 6 and in the *Albuquerque Journal* on July 11. We appreciate your willingness to engage in an open public dialogue on the challenges of recovering the Mexican wolf in the Southwest; and we appreciate your clarifications regarding the minimal threats to human safety and elk populations posed by restoring wolves to the landscape.

However, we in the conservation science community are outraged by outright misinformation and misapplication of science within the op-ed regarding the carrying capacity of the Blue Range Wolf Recovery Area (BRWRA) to support a population of Mexican gray wolves.

The specific misinformation we are referring to are the statements that 1) the 5-Year Review concluded that the BRWRA could not support 100 wolves, 2) the 5-Year Review was conducted by independent scientists, and 3) these “independent” scientists reached their conclusion that the area could not support 100 wolves after considering, among other factors, the “socio-economic carrying capacity” of the area. All of these statements are completely false. As a result, hundreds of thousands of readers may falsely believe that, according to non-agency scientists, the BRWRA is incapable of supporting 100 wolves. Regardless of whether or not this was your intent, we are appalled.

The Endangered Species Act (ESA) requires the conservation and recovery of listed endangered species. The goal of establishing a wild population of at least 100 Mexican gray wolves in the BRWRA is not arbitrary. It is established as a stated numerical objective in the Mexican Wolf Recovery Plan, Final Environmental Impact Statement, Record of Decision, and final ESA Section 10(j) rule.

The discussion of carrying capacity occurs on page TC-18 of the 5-Year Review. The only estimates of carrying capacity reported are those made by the independent scientists who conducted the 3-Year Review of the Mexican wolf reintroduction project (Paquet et al. 2001). The Paquet report concluded that the BRWRA could support 213 wolves if they consumed only elk and 468 if they consumed both elk and deer. (We note that the 5-Year Review authors mistakenly stated that the estimate of 468 wolves was based on wolves consuming all ungulates available rather than only elk and deer.) To be fair, the authors of the 5-Year Review advance three competing hypotheses for why the actual carrying capacity

for wolves could be lower than the Paquet report's estimate of 213-468 wolves, none of which consider social or economic factors. But they make no attempt to derive revised estimates of carrying capacity based on these hypotheses. To be clear, nowhere do the 5-Year Review's authors state that the carrying capacity of the Blue Range Wolf Recovery Area is less than 100 wolves, as you claimed in your op-eds.

Your statement that the 5-Year Review was conducted by "independent scientists" is blatantly false. The preface to this report clearly states that "AMOC and the IFT conducted the 5-Year Review." The Adaptive Management Oversight Committee (AMOC) and the Interagency Field Team (IFT) are both comprised of agency staff from the six agencies that cooperate in the management of the BRWRA reintroduction project.

Your statement that the authors of the 5-Year Review considered, among other factors, the "socio-economic carrying capacity" is also not supported by the actual content of the 5-Year Review. It contains no such consideration and makes no reference to this term or any closely related term. Your plucking of an arbitrary "socio-economic carrying capacity" of less than 100 Mexican wolves out of thin air is devoid of any factual basis, much less any scientific content.

In total, your op-eds flout the U.S. Fish and Wildlife Service's recently formulated policy on ethical conduct.

In his testimony before the United States House of Representatives Committee on Natural Resources on May 21, 2008, Assistant Secretary of the Interior for Fish Wildlife and Parks, R. Lyle Laverty, gave the committee chairman and members his strong assurance that the past misapplication and abuses of science within the Department of the Interior would not recur as a result of a new policy that assures the integrity of science within the department.

In keeping with the department's new pledge regarding scientific integrity, the U.S. Fish and Wildlife Service adopted a *Scientific Code of Professional Conduct for the Service* (General Administration Part 212 Ethics FW 7) on January 28, 2008. Among many provisions this policy requires all employees to "[p]lace reliability and objectivity of scientific activities, reporting, and application of scientific results ahead of personal gain or allegiance to individuals or organizations;" and to "[d]ifferentiate among facts, scientific principles, mathematical or statistical estimates based on data, hypotheses, professional judgments, and personal opinions to the extent possible and practicable in reporting the results of scientific activities to others, including scientists, decision makers, and the public."

In light of the assistant secretary's assurance to Congress and new policy to prevent abuses of science, we find your fabrication of a substantially lower carrying capacity for the BRWRA and your false attribution of this new finding to a nonexistent group of "independent" scientists especially egregious. These abuses of science and integrity and the misleading of the readers of your two op-eds must be corrected.

Therefore, we request that you write a formal retraction/correction of the erroneous information we have identified in this letter including an apology to the readers of your op-eds and to the scientific community, and that you submit the retraction/correction to all publications that received your op-ed submission within five business days of receipt of this

letter. Furthermore, we request receipt by certified mail of copies of your submitted retraction/correction.

We believe this is the minimum response necessary to begin to restore yours and the U.S. Fish and Wildlife Service's credibility with the general public and the scientific community.

Sincerely,



David R. Parsons  
Carnivore Conservation Biologist

cc:

Congressman Nick Rahall, Chairman, House Committee on Natural Resources  
Congressman Raul Grijalva, Member, House Committee on Natural Resources  
Congressman Tom Udall  
Senator Jeff Bingaman  
Dirk Kempthorne, Secretary of Department of the Interior  
R. Lyle Laverty, Assistant Secretary of the Interior for Fish, Wildlife, and Parks  
H. Dale Hall, Director, U.S. Fish and Wildlife Service  
Governor Bill Richardson  
Governor Janet Napolitano  
Steve Mills, Editorial Page Editor, Albuquerque Journal  
Phil Boas, Editorial Page Editor, Arizona Republic  
John Fitzgerald, Policy Director, Society for Conservation Biology  
Dr. Francesca Grifo, Senior Scientist and Director, Scientific Integrity Program, Union of Concerned Scientists

This letter is endorsed by:

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