

12 February 2021

Mr. Gabe Johnson-Karp, Attorney
Wisconsin Department of Justice

Dear Mr. Johnson-Karp,

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Wisconsin Natural Resource Board,

Dear Board

I oppose a wolf-hunt but because the court ordered one, I have scientific recommendations.

I have formally studied human-wolf coexistence in Wisconsin since 2000. I served as an official peer reviewer for the U.S. Fish & Wildlife Service in 2019, served on the WDNR wolf science advisory board, and I have published >133 scientific articles on predator ecology, conservation, and management. I also listened to most of the court proceedings from Jefferson County on 11 February 2021.

I recommend a quota of one for the following reasons:

I recommend the quota be set to zero (0) in the ceded territories because there is no time for federally mandated consultation with the tribes and the NRB opens the state to a damaging federal lawsuit if it proceeds without consultation. That lawsuit will be much more divisive and costly to the state than the Jefferson County court decision.

Outside the ceded territory I recommend a quota of 1 wolf because wolves have already been killed illegally since federal delisting on January 4th if not earlier. Those wolves should; be counted against the hunting quota. Also, the DNR should balance last week's court order against its statutory and common law duty to apply scientific reasoning to all take quotas, so as to ensure preservation of game populations for future generations. Setting a quota of 1 would avoid risk of unknown magnitude while complying with the court order. The scientific basis for

wolf hunting trapping, and hounding in February 2021 is non-existent for the following reasons:

(If you need citations to peer-reviewed scientific evidence for the assertions below, I am happy to-provide those on short notice.)

Neither Wisconsin nor any other state in the Western Great Lakes region has conducted legal, regulated wolf hunting, trapping, or hounding during the January-February pairing, mating, and pregnancy season for wolves. Therefore, we have zero information on the suppression of reproduction that will ensue.

Pregnancies might abort or fail to occur, pups might be orphaned of a breeding pair are separated or or one is killed and surviving wolves are unlikely to recover and breed if they are not already reproductively paired and receptive right now. That raises significant uncertainty about the sustainability of this hunt and raises the possibility that the November 2021 wolf hunt would have to be cancelled because of a lack of reproduction this February. The uncertainty itself is so large that no reasonable, science-based plan for hunting would proceed in such ignorance.

Moreover, state data on reproduction during normal years is indirect and statistically dependent on our wolf counts, which means we cannot distinguish young of the year easily from adults from previous years when we conduct winter census, for the vast majority of state wolf packs.

That implies two things about the May 2020 wolf count and the ongoing census. The May 2020 wolf count does not include reliable information on the proportion of packs that bred last year, so the judge's repeated assertions that in effect there are plenty of wolves, is an incomplete analysis. The number of wolves is only one aspect of judging whether a hunt would be sustainable. We need to know if those wolves were distributed in breeding pairs and had litters last year. We do not know that.

For the upcoming April 2021 count of wolves, there is a risk the February 2021 hunt will disrupt the count given that civilian trackers will not want to be out while hunters are shooting, trapping, and hounding. Over 50 civilian trackers quit in

2013 when similar events transpired. Moreover, we will not know by November of 2021 how many litters were born this winter because the annual census of all packs requires winter conditions, therefore the next hunt will begin on even shakier scientific grounds than the present one in February 2021.

Finally, our research has shown without doubt that illegal killing rises following federal delisting and liberalizing wolf-killing; it not only starts immediately but it outpaces legal wolf-killing sometimes by a factor of two to three more wolves being killed illegally than are targeted for legal killing. Moreover, the component of such illegal killing that increases is the cryptic form, when perpetrators conceal evidence. Therefore, we will lose radio-collared wolves and not know what happened to them. Our team uncovered the disappearance of 24 radio-collared wolves in the first half of 2012 before the public wolf hunt even began, and the WDNR still has not reported what happened to those radio-collared wolves. Bearing in mind that only 1% of the wolf population was radio-collared on average, untold numbers of other wolves without radio collars are believed to have died that year also.

The state wolf management plan of 1999 and its addendum in 2006 have not taken into account any of the factors I describe above. The NRB green-sheets do not account for many of those factors in the past hunting plans of 2012-2014. Indeed, the plan did not have the benefits of much of the above information that came out subsequently. All of my evidence underlines the problem with an outdated, error-filled and obsolete management plan which must be the basis for a scientific quota today.

thanks for considering

Adrian Treves, PhD
Madison, WI