

MEMO

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TO: Legislators, State of Wisconsin

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RE: Illegal wolf-killing, destruction of evidence, and unsustainable human-caused mortality in wolves that threaten population security

I'm writing in regard to wolf delisting and the likely consequences it will have on Wisconsin's wolf packs through illegal take that threatens the long-term security of the state wolf population, beginning now or in January at the latest.

While I understand that moral or cultural values at times lead action, I also believe the most up-to-date science must be considered by governments committed to public trust principles or obligated to follow the best available science when designing policy.

The scientific landscape has changed.

1. Three independent lines of evidence confirm that federal delisting of wolves by itself leads to intolerant attitudes and actions. Among the actions we expect to see following the delisting is an increased rate of illegal wolf-killing. We expect the rate to accelerate the longer wolves are left without federal protections and liberalized killing is allowed through state-run seasons. The death toll for wolves will exceed legal wolf-killing. Cryptic poaching plus legal wolf-killing are likely to become unsustainable quickly, if strict law enforcement is not implemented successfully, and the sum of human-caused mortality will threaten the security of the state wolf population, which in turn might prompt relisting under the federal ESA.
2. Despite state or tribal protections for wolves, the lifting of federal ESA protections led to illegal take in the past. Scientists in my lab predict it will happen again or has already happened. With the delisting announcement, the federal government's policy signal to would-be poachers has been sent. That signal has led in the past to 'shoot, shovel, and shut up' behavior (cryptic poaching), which entails destruction of evidence and theft of taxpayer property in the form of radio-collars, in addition to loss of wolf lives, which is a public trust asset belonging to the broad public, current and future, not to poachers.
3. The Wisconsin wolf management plan of 1999 amended in 2007 contains scientific errors that should be addressed and corrected if the state wants the plan to

represent the best available science. It also contains implicit value judgments that should be clearly separated from the science.

4. Finally, the US Fish & Wildlife Service (USFWS) and the Wi DNR continue to rely on debunked science even after they have been provided with better, up-to-date factual information from. I explained this in my official peer review in 2019 requested by the USFWS [https://www.fws.gov/endangered/esa-library/pdf/Final%20Gray%20Wolf%20Peer%20Review%20Summary%20Report\\_053119.pdf](https://www.fws.gov/endangered/esa-library/pdf/Final%20Gray%20Wolf%20Peer%20Review%20Summary%20Report_053119.pdf). I also shared these newer, stronger scientific data with the White House Office of Management and Budget on 29 September 2020 and replied to the USFWS after seeing them cite outdated and inaccurate science on 14 December 2020. In sum, the state legislature should demand an update of the state wolf plan using best available science only.

I am happy to explain all of the above in writing, orally (virtually), as you see fit. thanks for considering