

**From:** Adrian Treves atreves@wisc.edu  
**Subject:** Public comments on wolf policy due June 7  
**Date:** June 4, 2021 at 10:25 AM  
**To:** Scott.karel@wisconsin.gov, DNRAAdministrativeRulesComments@wisconsin.gov  
**Cc:** Johnson, Randy D - Dnr Randy.Johnson@Wisconsin.gov  
**Bcc:** Crystal Liu crystal@animalearthlaw.com



Department of Natural Resources  
Attn: Scott Karel  
P.O. Box 7921 101 S. Webster Street,  
Madison, WI 53707-7921

Please find attached my public comment on wolf management and hunting regulations in the statement of scope. Thank you for the opportunity to comment.

The WDNR has often claimed that hunting wolves and other predators will generate net benefits for society. The common benefits claimed are protection of livestock, human safety, and improved tolerance for the survivors in the same population. The scientific evidence does not support these claims

The shifts in range of carnivores associated with human hunting have brought large carnivores closer to housing, settlements, and roads in other regions (Bunnefeld et al. 2006; Ordiz et al. 2013), which is expected to increase the costs of conflict and coexistence. In our region in particular, hounding has been associated with driving bears closer to paved roads and settlements (Stillfried et al. 2015), which might trigger the same response in wolves. Also, baiting has been associated with more conflicts with wolves (Bump et al. 2013). For wolves in Wisconsin and our region, the converse has been found using the best available scientific methods: costs outweigh benefits: reviewed in Treves and Bruskotter 2014; Treves et al. 2019; Treves and Santiago-Ávila 2020). These indicate that costs to society rise when people kill wolves by aggravating risk to livestock (Santiago-Ávila et al. 2018) and increasing deer-vehicle collisions (Raynor et al. 2021). Wolves do not need us to control their populations, so I see no scientific reasons to argue the benefits of public hunting outweigh its substantial costs to society and our native ecosystems.

In addition, I want to communicate the nearly complete absence of scientific information on the effects and unlawful errors caused by night-hunting wolves and hound-hunting wolves. In the absence of scientific information, I doubt wise public policy can be made, so I recommend collecting the scientific evidence vetted by independent peer review before approving any night-time hunting and hounding of wolves.

Articles cited in this email are included below along with links to where to read them for free. Finally, I call your attention to my prior public comment from May 15, 2021 addressed to Randy (copied here), which addresses fallacies in the science often used to design wolf hunting: [click here](#). For the Appendices [click here](#) and for references cited [click here](#). Also for an upcoming analysis of the effect of the 2021 wolf-hunt [click here](#).

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- Bunnefeld, N., J.D.C. Linnell, J. Odden, M.A.J. van Duijn, and R. Andersen, Risk taking by Eurasian lynx (Lynx lynx) in a human-dominated landscape: effects of sex and reproductive status *Journal of Zoology*, 2006. 270: p. 31-39 <https://doi.org/10.1111/j.1469-7998.2006.00107.x>.
- Diefenbach, D.R., J.C. Finley, A.E. Luloff, R. Stedman, C.B. Swope, H.C. Zinn, and G.J. San Julian, *Bear and deer hunter density and distribution on public land in Pennsylvania*. *Human Dimensions of Wildlife*, 2005. 10: p. 201-212. Raynor, J.L., C.A. Grainger, and D.P. Parker, Wolves make roadways safer, generating large economic returns to predator conservation. *Proceedings of the National Academy of Sciences*, 2021. 118(22): p. e2023251118. <https://doi.org/10.1073/pnas.2023251118>
- Ordiz, A., O.-G. Støen, S. Sæbø, V. Sahlén, B.E. Pedersen, J. Kindberg, and J.E. Swenson, Lasting behavioural responses of brown bears to experimental encounters with humans. *Journal of Applied Ecology*, 2013. 50(2): p. 306-314. <https://besjournals.onlinelibrary-wiley-com.ezproxy.library.wisc.edu/doi/abs/10.1111/1365-2664.12047>
- Stillfried, M., J. Belant, N. Svoboda, D. Beyer, and S. Kramer-Schadt, When top predators become prey: Black bears alter movement behaviour in response to hunting pressure. *Behavioural Processes*, 2015. 120: p. 30-39. 0.1016/j.beproc.2015.08.003. <https://www.sciencedirect-com.ezproxy.library.wisc.edu/science/article/pii/S0376635715300218?via%3Dihub>
- Treves, A. and J.T. Bruskotter, *Tolerance for predatory wildlife*. *Science*, 2014. 344(6183): p. 476-477

- Treves, A. and J.T. Bruskotte, *Tolerance for predatory wildlife*. Science, 2017. **357**(6353). p. 710-711. <http://faculty.nelson.wisc.edu/treves/publications.php>
- Treves, A., M. Krofel, O. Ohrens, and L.M. Van Eeden, *Predator control needs a standard of unbiased randomized experiments with cross-over design*. Frontiers in Ecology and Evolution, 2019. **7** p. 402-413. 10.3389/fevo.2019.00462. <http://faculty.nelson.wisc.edu/treves/publications.php>
- Treves, A. and F.J. Santiago-Ávila, *Myths and assumptions about human-wildlife conflict and coexistence*. Conservation Biology, 2020. **34**(4): p. 811–818. 10.1111/cobi.13472. <http://faculty.nelson.wisc.edu/treves/publications.php>
- Treves, A., P.C. Paquet, K.A. Artelle, A.M. Cornman, M. Krofel, and C.T. Darimont, *Transparency about values and assertions of fact in natural resource management*. Frontiers in Conservation Science: Human-Wildlife Dynamics, 2021. **2**: p. e631998. 10.3389/fcosc.2021.631998. <http://faculty.nelson.wisc.edu/treves/publications.php>

Sincerely,

Adrian Treves, PhD  
Professor, Nelson Institute for Environmental Studies  
University of Wisconsin-Madison  
30A Science Hall, 550 North Park St., Madison, WI 53706, USA  
[atreves@wisc.edu](mailto:atreves@wisc.edu) • <http://nelson.wisc.edu/people/treves/> • Tel: +1-608-890-1450

*The University of Wisconsin–Madison occupies ancestral Ho-Chunk land, a place their nation has called Teejop (day-JOPE) since time immemorial.*

*In an 1832 treaty, the Ho-Chunk were forced to cede this territory.*

*Decades of ethnic cleansing followed when both the federal and state government repeatedly, but unsuccessfully, sought to forcibly remove the Ho-Chunk from Wisconsin.*

*This history of colonization informs our shared future of collaboration and innovation.*

*Today, UW–Madison respects the inherent sovereignty of the Ho-Chunk Nation, along with the eleven other First Nations of Wisconsin.*