



Public Comments
submitted to the
2021 Wolf Harvest Advisory Committee

Comments were received via email and copied verbatim into the document. Comments are in no particular order. Full length submitted letters follow at the bottom of the document.

6/18/2021

Last Name	First Name	Comment
Hollis	Kimberly	<p>Thank you for allowing me to add my written comment on the fall wolf quota.</p> <p>I believe that a zero quota for the fall wolf hunt is appropriate. The February hunt was over quota by double, and the tribes did not receive what was rightly theirs. Wisconsin has already lost 20% of our wolf population this year, and the number of wolves killed illegally is still unknown. During the Wolf Harvest Committee meeting I was troubled to hear the number of tracking collars have fell silent since the February hunt, making the illegal kill numbers more concerning. In the future it should be illegal to kill any wolf with a collar. They are placed on the wolf for scientific study, and paid for by Wisconsin taxpayers, they should be off limits.</p> <p>The individuals that participated in the February hunt felt entitled to take the wolves that were allotted to the tribes, and planned on Facebook to exceed the quota. It shows a lack of respect for the tribes and the rules of the hunt. The tribes had their wolves stolen from them. I have no reason to believe that these individuals will behave any differently in November, if allowed to hunt again. During the Wolf Harvest Committee meeting some of the hunting representatives, still insisted that they had not exceeded the quota, as the 200-wolf quota was the number they killed, they ignore that they took wolves that were not theirs to take. ACT 169 dictates the 24-hour zone closure notice, the ability to switch zones when a closing is announced, and 24 hours to register the kill, making it impossible to shut down a hunt before the quota is exceeded again.</p> <p>The survey stated that there were 1200 wolves in Wisconsin. How could that number be verified when winter wolf census was never completed? There has not been enough time to analyze the February 2021 wolf hunt and answer all the questions, including the long-term ramifications of hunting during breeding season. How many pregnant females were killed? How many pups were able to survive to see this spring? Best science needs to be the guide going forward. There should be no further hunting or trapping of wolves until all the results are known, it would be reckless. Act 169 needs to be repealed, as it mandates that a wolf hunt be held each year that the wolf is not listed on ESA. Act 169 also gives too many advantages to the hunter, night hunting, night vision, snowmobiles, ATV's, baiting, snares, traps, cable ties and hounds. In February, 188 of the wolves were killed using hounds. I have had hunters in my life, they practiced fair chase. I don't see any of that ethic in the wolf hunting rules, or the wolf hunters.</p> <p>Wisconsin needs a new wolf management plan very badly. The bear and deer are not managed with a plan from 1999, the wolves should not be either. I did notice that the hunting representatives at the Wolf Harvest Committee are all fixated on the 350-wolf management goal for Wisconsin. They also seem interested in inflating the wolf count after the February hunt. It looks to me that their goal is to kill as many wolves as possible this fall. To have only 350 wolves in Wisconsin is unacceptable, I would like to see more wolves, not less.</p> <p>The water, land (including National Forests) and animals belong to all Wisconsinites, not just those that hunt and trap. Special interest has had too much influence in wildlife management in recent years. We need science and the will of the public to be considered. The February hunt was an embarrassment, and the last thing we need is a repeat of the February wolf slaughter.</p> <p>Thank you for your consideration of my comment.</p> <p>Kimberly Hollis Winter, WI</p> <p>I was wondering if it would be possible to use Zoom for all future wolf meetings? Many people have Zoom or Skype, but do not have Business Skype. I was not able to access the last Wolf Management Meeting. In an effort to be transparent during this process, could meetings please be on Zoom? Thanks!</p>
Erickson	Tom	<ol style="list-style-type: none"> 1. Change Season dates so harvested wolf pelts are in winter prime. Treat like a trophy animal. 2. Raise price of tags. Treat like a trophy animal. The harvest is a very small number. 3. No hunting with dogs. This is disgusting and gives all hunting and hunters a bad name. 4. Recognize the ecological importance of wolves on the landscape.
Fuchs	Lori	<p>To whom it may concern,</p> <p>Wildlife belong to all citizens. While I personally support wolf management, I strongly disagree with last years hunt.</p> <p>The DNR violated public trust by allowing the February wolf hunt to exceed quotas, as well as occurring during breeding season. Out of state so called hunters used high tech tracking and hounds during night to run alpha male wolves and possible pregnant females down to slaughter. This is unethical and does not promote sustainability of Wisconsin wolf population. The carnage exceeded quota so quickly the hunt had to be stopped early. As supported by DNR recording, loss of alpha males led inexperienced males to attack livestock.</p> <p>Please consider the following:</p> <ul style="list-style-type: none"> -Use scientific data to verify population counts and drive quota numbers. Hunt to sustain population, or for meat; not trophy hunting. -do not let the hunt occur in February, when mating is taking place. -hunt quota for sustainability, not the uncontrolled carnage that occurred last February. -ban especially, the use of hounds for hunting. Also high tech tracking systems. <p>Thank you for your consideration,</p> <p>Lori Fuchs fuchslori@gmail.com</p>
Belsky	Mike & Jayne	<p>2021 Wolf Harvest Advisory Committee Members, June 15th 2021</p> <p>My wife and I are lifetime Wisconsin residence; lifelong hunters and we have our home and property in rural wolf territory. We have been ardent WI DNR supporters through our purchase of hunting & fishing licenses, state park stickers, endangered license plates and over the years thousands of hours of volunteer work. In the past we were confident in the DNR's ability to make good decisions for our natural resources. That confidence came to an end last Feb. when we watched the abomination of the "wolf hunt" play out. It was a complete failure of the WI DNR Board when they made decisions to go against what science was telling us. It was a slap in the face to the tribes and the rest of us who had put our trust in their ability to make good decisions.</p> <p>We are fortunate to live in an area with abundant wildlife, including wolves. We have seen coyotes, bears, fishers, bobcats, deer, wolves and every critter in-between on our trail cameras or while out hiking or hunting. This year we had a small pack of four wolves show up consistently and we were thrilled. Finally our property and the surrounding area were complete with the wildlife that should be here. We couldn't wait to check our cameras through December, January and early Feb. We had hoped for pups this spring. The night before the Feb slaughter all four were together. Three days later we only had one lone wolf. We found out that three wolves had been killed a short distance from our home. We had seen the lone wolf a couple of times after that and she looked pregnant. We know those pups will not survive without help from the rest of her pack. The Boards decisions were not only unethical, careless and cruel but it affected us on a very personal level. That hunt was entered into knowing full well the devastation a hunt during breeding season would cause. It's almost laughable now to look on the DNR web site where they talk about respecting wildlife, hunter's ethics and fair chase and then look at the slaughter (late registration, hounds, night hunting & snowmobiles) that was allowed to happen when our wolves were at their most vulnerable. How are they going to teach THIS to our young and impressionable hunters in hunter safety classes? Our wildlife deserves better, we all deserve better. We are all stewards of this land.</p> <p>We hope in the future the Board can gain back some credibility with the people they represent by doing the right thing. We hope this Wolf Advisory Committee will listen to the experts, the tribes and what the majority of Wisconsin Citizens are asking for. We hope this Committee can offer scientifically sound and ethical suggestions to the Board. We are asking for a "zero" quota for any hunt planned in November. There is no way you can justify killing more wolves without knowing the negative impact the Feb. decisions have had on a small population. We know it was a court ordered hunt but the court did not order the death of over 30% of our wolves so the Board has to own that. None of us can estimate the impact another hunt in November would have without waiting a year and getting a decent wolf count. How can you consider a safe kill number when you don't even have a population number to start from? But we suppose someone will come up with a guess number to throw at the wall. It just cannot be done accurately! For any future hunts no night hunting, no snowmobiles, no hounds and immediate registration.</p> <p>Thank you for your time, we hope our comments (like so many others) will not end up on the bottom of the pile without consideration. It is apparent that the only voices many listen to are the minority trophy and hound hunters. Maybe it's time to change that.</p> <p>Respectfully, Mike & Jayne Belsky 9th Ave Necedah, WI 54646 608-565-3186</p>

Camillo	Jessica	<p>Thank you for allowing me the opportunity to submit a statement to this meeting. My name is Jessica Camillo. I'm a Military Spouse, Mother, Photographer and I've been in love with wolves all my life and I've studied about wolves on my own since high school. I graduated with the class of 2000. My husband and I plan on opening a Wolf & Wolf Hybrid Sanctuary when he retires in a few years. This is obviously a very important meeting for the wolves of WI. If only they could understand why a group of humans were sitting in a meeting decided how many of them are ok to kill. Something that has truly effected my life in a really negative way is seeing my fellow humans, in a lack of better words, play God. I have a very hard time with personal relationships because I just can't understand why some people don't see the negative impact removing wolves has on our eco system. I guess the consequences are too far into the future maybe.</p> <p>Lobster season in Southern California has strict rules on what can be caught. No female lobsters, non under a certain length and weight, and only a set number can be harvested. San Diego has Fish and Wildlife Officers checking and patrolling everywhere during lobster seasons. We have strict guidelines for lobsters that come with heavy fines and jail time for re-offenders but not for wolves? An alpha male and female mate for life. They are the only breeding pair in a pack. You are allowing hunting season to be during breeding season? Last year after I heard that many more wolves were killed than was supposed to be I cried. I cried every time I saw an article about it, or watched the news about it. To be very honest I am embarrassed to be human. We must find clear rules and guidelines like not hunting during breeding season, no killing nursing or pregnant females or wolves under a certain size. Because allowing the killing an alpha male already puts an entire pack a great risk of dying or falling apart. Wolves are essential to our eco system. If we don't find a way to protect them, the ones who are going to suffer that mistake is our grandchildren and their children.</p> <p>I just sent in my statement for the fall Wolf Harvest meeting. I apologize there was so much I wanted to say but wanted to keep it as short as possible. If you think I need to make any changes please let me know and I'll fix it immediately.</p> <p>Thanks, Jessica Camillo</p>
Prost	Jamie	<p>After just returning from Grand Teton National Park (and Yellowstone last Feb) it reinforced how important wildlife and nature is to my entire extended family of WI residents; it was a thrill to see each moose, elk, antelope, mule deer, pika, beaver home which require a healthy ecosystem managed holistically and NOT at an individual species level. We did miss the bears and wolves which are just as important even though more elusive. Just imagine IF Wisconsin had the national reputation of really caring and supporting our limited natural resources and it was a tourist destination with economic \$ coming from wildlife photographers, ecotourism, hikers, etc and NOT the un-ethical hunting practices and negative reputation we have 'earned' now. DNR should have solid science data & research in place to understand the critical role that wolves play in managing over population of other species like deer with CWD, coyotes and even other tangible benefits whereby wolves facilitate less deer/auto accidents on the roads (recent research just published).</p> <p>The DNR and NRB is too beholden to politics and hunter interests and should instead follow their own organizational mission as ; it is also outrageous that an NRB board member does not resign his seat when his term is up....what special interests is he staying in place to protect? TO PROTECT AND ENHANCE OUR NATURAL RESOURCES....OUR WILDLIFE...AND THE ECOSYSTEMS THAT SUSTAIN ALL LIFE. TO PROVIDE A HEALTHY AND SUSTAINABLE ENVIRONMENT AND A FULL RANGE OF OUTDOOR OPPORTUNITIES. TO ENSURE THE RIGHT OF ALL PEOPLE TO USE AND ENJOY THESE RESOURCES....TO CARRY OUT THE PUBLIC WILL.....</p> <p>The DNR and NRB should be scientifically sound in their decision making using recent data; this means understanding the impact of the prior wolf hunt during breeding season & knowing what # is a strong, sustainable population & developing population models (that 3rd party biology organizations agree with using their own independent analysis) & having an accurate wolf population count released to the public and the Wolf Advisory Committee PRIOR to any fall wolf quota recommendation.</p> <p>It seems your current process does NOT focus on a small geographical area of problem livestock depredation and may likely cause a worse situation with dead beef baiting and disrupting successful packs of hunters and killing wolves in territories with no farm issues. What about focusing more and encouraging farmers with other successful management practices like special breed dogs to protect livestock? DNR management should not be harvest = slaughter.</p> <p>The DNR and NRB should also have a transparent process aligned with its original mission and which represents what the majority of WI residents value; this is not the small % of our population which are hunters. Most hunters do not support trophy hunting of our few wolves and bears with unethical baiting, snaring, night hunting, using packs of hounds, killing contests, etc. There is no reason to kill a wolf other than a 'sick' goal of the thrill of a kill. Yet, I am in full support of hunters & fisherman who value the animal and use the animal for meat and only take what is needed with one quick, humane gun shot or arrow.</p> <p>We are so far below the tens of thousands of wolves that used to inhabit the lower 48 states years ago before their USA decimation; wolves don't know or respect our arbitrary state boundaries. Their #s can and should be much greater than the ~1100 (prior to the hunt) estimate and still be extremely low to their natural state.</p> <p>Sincerely, Jamie Prost 35+ yr WI resident</p>
Reisch	Sherry	<p>Dear Wolf Harvest Committee: I believe there should be no killing of wolves. Wolves need connected populations for genetic sustainability and natural ecosystems need wolves to maintain a healthy balance of species. Yet today wolves occupy less than ten percent of their historic range. In Wisconsin when wolves briefly lost protections for two years, wolf hunting and trapping seasons were immediately launched and more than five hundred wolves were killed. This was allowed even though science shows that wolves are not negatively impacting Wisconsin deer population, are responsible for only 0.02 percent of livestock losses and regulate their own populations without the need for people to hunt them. According to the governments own reports, the primary cause of cattle and sheep deaths in the U.S. comes from health problems, weather, theft and other maladies - not wolves or other carnivores. Of the small percentage of losses caused by predators, wolves are at the bottom, even below domestic dogs. Local economies and small businesses are supported by tourists who flock to wolf habitats for a glimpse of wolves or to hear their multi-pitched songs. The Fish Wildlife Service found the wildlife watchers outspent hunters in 2016 by a ratio of nearly 3 to 1. While wildlife watching increased by 28 percent between 2011 and 2016 to a whopping 76 billion, hunter expenditures fell 30 percent to 26 billion. Wolves are extremely shy and want nothing to do with people. If they see, smell or hear you in the woods, wolves are likely to move away long before you even see them. If a wolf is curious and watching you, it's most likely to be a young wolf that doesn't know yet to fear humans. If a wolf has rabies, is injured or sick, or has become food-conditioned to humans, then and only then does human safety become a concern. Also, wolves view dogs as territorial competitors and can attack dogs and kill them, so if you are hiking in wolf territory with your dog, keep it leashed and close by. Otherwise attacks by wolves is not of great concern. In the last ten years in North America, there have only been two instances of wolves killing a human and in one of these cases experts disagree on whether the culprit was wolves or bears. In comparison, every year in the U.S. around 16 to 30 people are killed by dogs, around 30 are killed by livestock and around 200 are killed by deer in automobile collisions. Like all wild animals, wolves should be treated with respect. They are an integral part of our existence, of ecosystems that support human life. I oppose wolf hunting, wolf trapping or killing wolves to address conflicts with livestock. I am counting on you to take the right steps to ensure a future for wolves in Wisconsin. Sincerely, Sherry Reisch</p>
Beck	Tracy	<p>After killing 30% of our Wolf population according to a poll by the Wisconsin humane society including bread females and alpha males we don't have enough scientific data to warn another woodhaunt this fall. 0 quota. World should not be hunted that reside deep within our national force where they belong. A strongly benefit our force ecosystem including chronic wasting disease and controlling the deer herd. Hunting wolves and breaking up packs has been proven to increase depredation which we are already seeing after the February hunt in Wisconsin. So are we hunting wolves to purposely increase depredation. Such a senseless act. According to the same poll most Wisconsin aides do not support a Wolf hunt and enjoy camping in our national force hoping to hear wolves howl and even be lucky enough to see one. I do not support a Wolf hunt just because the law says so. That law needs to be appealed because it is unsustainable.</p>

Menter	Sue and Scott	<p>To the Wolf Committee:</p> <p>We are terribly overrun with Whitetail Deer in Burnett County and have commonly seen 47 deer cross our driveway in a day. They are starving and eat all our plants, ignoring the deer repellent. There are many deer ticks here, too, and many residents with Lyme's disease. Last year, I contracted Lyme's disease from an infected deer tick in my yard.</p> <p>IN 2018, the WI Dept. of Health Services reported an estimated 3,100 cases of Lyme's Disease, However, many cases are not reported to the CDC, so the number is likely much higher. In addition, per the article below, the number of Lyme's Disease in WI has doubled in the past 10 years.</p> <p>Many WI deer are sick with CWD, and it is getting worse. A WI DNR biologist told us there is no plan for combatting CWD in the wild deer. A deer farm was recently found to have CWD right here in Burnett County.</p> <p>Throughout history, zoonotic diseases have caused pandemics and plagues, when disease jumps species from animals to humans. After the past year of the Covid-19 Pandemic, experts believe that pandemics will become more common in the future. Over 75% of emerging infectious diseases are zoonotic. (Taylor, et al., 2001). Can CWD jump from animals to humans someday? Do we leave CWD unchecked in the WI wild deer population? Are all deer hunters testing the venison before consuming it?</p> <p>As noted from the NYT article below, WI is named as a hotspot for CWD in wild deer. Scientists believe that wolves can help reduce CWD, in the wild deer populations.</p> <p>The overpopulated deer are a traffic hazard, too. Driving to town, we see groups of deer on the roadways most of the time. WI has had 18,000 -20,000 deer/car accidents annually for the past 5 years. In 2020, there were over 550 injuries and there were 9 deaths due to these deer/ driver collisions.</p> <p>The overpopulation of Whitetail deer seems to be becoming a serious Public Health and Public Safety Issue in Wisconsin.</p> <p>Wolves are the only sensible solution to culling sick and overpopulated deer, and at no cost to the taxpayer. With maybe 600 wolves left in WI and 1.6 million deer, why is killing any WI wolf a good idea?</p> <p>Zero Quota is the only logical number for an WI wolf hunting and trapping season in 2021 and in future years.</p> <p>Thank you for your time, Sue and Scott Menter 6556 Hayden Lake Road, Danbury, WI 54830</p>
Hollis	Kimberly	<p>Thank you for allowing me to comment.</p> <p>Because of the exceedingly large overkill that occurred in February 2021 I support a zero quota. The overkill was 83% or 99 wolves. It should also be taken into consideration that overkill number does not include the wolves that were killed illegally. I would have to believe that the illegal kills were high. Due to the large number of individuals that participated in the hunt, both licensed and unlicensed, and the chatter on social media. The overkill from February needs to be calculated into the fall wolf season quota.</p> <p>Another important factor is hunting during breeding season. Pregnant females were killed. Many packs will not produce pups this year. Because so many packs lost members, any pups that were born probably did not survive until spring. The collateral damage on the wolf population from the February hunt will be seen for many years. This should also be a consideration.</p> <p>The February 2021 wolf hunt did not honor treaty, land and the heritage rights of the Native tribes. The tribes never received the 81 wolves that were legally theirs in the February wolf hunt. This needs to be a consideration in the fall hunt.</p> <p>The wolves in Wisconsin belong to all Wisconsinites, not just the hounders, hunters and trappers. This needs to be considered going forward.</p> <p>Kimberly Hollis Winter, WI</p>
Collins	Jane	Please, no 2021 wolf hunt. Save our Gray Wolves. Thanks, Jane Collins
Simonik	Kathy	TOO many Wolves are being killed. It has gotten WAY out of control. Wolves are a keystone species and are very valuable to our Ecosystem. There are fallacies being reported about Wolves. They are NOT the problem. Their lands have been encroached upon! Please gather more information that will show that you are over-killing! Stop!
Beck	Tracy	After killing 30% of our Wolf population according to a poll by the Wisconsin humane society including bread females and alpha males we don't have enough scientific data to warn another woodhaunt this fall. 0 quota. World should not be hunted that reside deep within our national force where they belong. A strongly benefit our force ecosystem including chronic wasting disease and controlling the deer herd. Hunting wolves and breaking up packs has been proven to increase depredation which we are already seeing after the February hunt in Wisconsin. So are we hunting wolves to purposely increase depredation. Such a senseless act. According to the same poll most Wisconsin aides do not support a Wolf hunt and enjoy camping in our national force hoping to hear wolves howl and even be lucky enough to see one. I do not support a Wolf hunt just because the law says so. That law needs to be appealed because it is unsustainable.
Reisch	Sherry	<p>Dear Wolf Harvest Committee:</p> <p>I believe there should be no killing of wolves.</p> <p>Wolves need connected populations for genetic sustainability and natural ecosystems need wolves to maintain a healthy balance of species. Yet today wolves occupy less than ten percent of their historic range.</p> <p>In Wisconsin when wolves briefly lost protections for two years, wolf hunting and trapping seasons were immediately launched and more than five hundred wolves were killed. This was allowed even though science shows that wolves are not negatively impacting Wisconsin deer population, are responsible for only 0.02 percent of livestock losses and regulate their own populations without the need for people to hunt them. According to the governments own reports, the primary cause of cattle and sheep deaths in the U.S. comes from health problems, weather, theft and other maladies - not wolves or other carnivores. Of the small percentage of losses caused by predators, wolves are at the bottom, even below domestic dogs.</p> <p>Local economies and small businesses are supported by tourists who flock to wolf habitats for a glimpse of wolves or to hear their multi-pitched songs. The Fish Wildlife Service found the wildlife watchers outspent hunters in 2016 by a ratio of nearly 3 to 1. While wildlife watching increased by 28 percent between 2011 and 2016 to a whopping 76 billion, hunter expenditures fell 30 percent to 26 billion.</p> <p>Wolves are extremely shy and want nothing to do with people. If they see, smell or hear you in the woods, wolves are likely to move away long before you even see them. If a wolf is curious and watching you, it's most likely to be a young wolf that doesn't know yet to fear humans. If a wolf has rabies, is injured or sick, or has become food-conditioned to humans, then and only then does human safety become a concern. Also, wolves view dogs as territorial competitors and can attack dogs and kill them, so if you are hiking in wolf territory with your dog, keep it leashed and close by.</p> <p>Otherwise attacks by wolves is not of great concern. In the last ten years in North America, there have only been two instances of wolves killing a human and in one of these cases experts disagree on whether the culprit was wolves or bears. In comparison, every year in the U.S. around 16 to 30 people are killed by dogs, around 30 are killed by livestock and around 200 are killed by deer in automobile collisions.</p> <p>Like all wild animals, wolves should be treated with respect. They are an integral part of our existence, of ecosystems that support human life. I oppose wolf hunting, wolf trapping or killing wolves to address conflicts with livestock.</p> <p>I am counting on you to take the right steps to ensure a future for wolves in Wisconsin.</p> <p>Sincerely, Sherry Reisch</p>
Klug	Alex	<p>Hello,</p> <p>It seems that activists and other groups across the U.S. have taken it upon themselves to involve themselves in the WI wolf hunt. I just wanted to voice my opinion as a lifelong resident of wi. There isn't much to say on the issue but I think that it is self explanatory that as with any species the need to be properly managed. I'm not a "kill all the wolves" or a "save all the wolves" advocate. I'm a "manage all the wolves" kind of individual. So hopefully throughout this next meeting the dnr and advisory committee are able to look past biased opinions and bogus political opinions to make a scientific and logical way to continue to manage wolves. Hopefully somebody reads this actually lol.</p> <p>Thanks, Alex Klug Lincoln county wi</p>
Neuman	Lori	<p>The thought of another wolf massacre this fall is absolutely appalling. The law NEEDS to be changed about a mandatory season. I can only hope the Wolf will be protected by being put back on the Endangered Species List. Because Wolves Need to be Protected from such Horrific Cruelty. Wolves Belong Here. Anti-wolf archaic vengeance is Horribly Wrong!! These Magnificent Beings do NOT deserve such a evil reputation from outdated persecution that has NEVER been justified. This fall season the Wolf Needs to be treated with respect. Hunting with dogs, night hunting, traps, snowmobiles and atvs ALL Need to END!! This is NOT Ethical hunting!! This is CRUELTY!!</p> <p>Please Respect the Wolf.</p> <p>Thank you. Lori Neuman Manitowoc, Wisconsin.</p>
Brown	Deb	I support zero quota for wolf hunt. They are an important part of the eco system in this state. They are just thrill trophies for hunters and the use of traps and dogs to hunt them is wrong. We need to learn to live with them and manage them in a better way before they disappear.

Haan	Marina	Please eliminate or limit wolf hunting in Wisconsin. The presence of wolves is an asset to our environment. It helps balance our econ-system. Wolves are a plus for viewing by eco-tourists. Ranchers are well-compensated for the loss of any livestock. —Marina Haan Madison Wisconsin
Perry	Jeannie	we have made national news with our brutal and swift wolf decimation recently. let's not do it again! bloodthirsty hunters out killing wolves just for fun -- not even for food. why are we trying to wipe out a species? aren't we all raping the earth enough? j. perry port wing
Feest	Gary	I'm opposed to the Fall wolf hunting season. The Spring hunt was a disaster, disrupting wolf families, and I believe that this may cause more depredation of livestock than if the packs had been left alone. Depredation of livestock is a minor problem to begin with, and was not a good reason for the hunt. The WDNR did not follow it's mission statement in regards to the February wolf hunt and the state violated the Public Trust Doctrine. The Spring hunt was poorly planned, poorly overseen, and was an embarrassment to our state. The biological impacts of the February hunt, held during the wolves' breeding season, will never be fully understood due to a lack of important biological data collection. Impacts to the overall population, and impacts to specific local wolf packs, cannot be known. Only 4% of people now identify themselves as hunters (National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. 2016). Relying on hunter funding leads to a narrow focus on managing game animals for a small special interest base. Wolves, and wildlife in general, belong to ALL the citizens of the state, and hunters control a disproportionate amount of power when it comes to decision making regarding Wisconsin's environment. A reliable wolf population estimate will be lacking when quotas are set for the proposed fall 2021 hunt. The fact that hunters are still allowed to use hounds when hunting wolves is enough reason to cancel any Fall hunt. In my opinion, hunting with hounds-whether for wolves, bears, or coyotes-should be outlawed; It's nothing but legalized dog fighting. Thank you for your consideration, Gary J. Feest
Cramer	Maria	To Whom It May Concern: I am opposed to opening a wolf hunting season in 2021 under the current rules. The manner of the "hunt" this February bore no resemblance to any manner of "fair chase" hunting. Use of dogs (not permitted in any other state), night hunts, use of bait, and killings that disrupt stable wolf packs all point to a lack of ethical or moral or scientific alignment. And, sadly, a failure of the DNR to do its job. Moreover, it would seem that critical data to ensure wolf survival is still lacking: data on the outcome of wolf pack disruption, wolf pup survival, total number of wolves killed but not recovered or reported, etc. I can tell you that friends from outside of Wisconsin were astounded when they heard about the fiasco in the previous hunting free-for-all, as reported in nationally distributed newspapers. I was ashamed: "Wisconsin Hunters Kill Over 200 Wolves in Less Than 3 Days" By Maria Cramer The New York Times March 3, 2021
Flogel	Adam	To Whom it May Concern, It's no secret that what happened with the wolf hunt earlier this year was a debacle and embarrassment to our wonderful state. The relentless slaughter was out of hand nearly as soon as it began. Please don't let this happen again, and put more consideration into conserving this keystone species. Hunting practices that will have negative impacts on the long-term health of the wolf population must be prohibited. The precautionary principle must be exercised when setting a quota to prevent more harm to the wolf population. Critical data is missing on pack disruption, pup survival, number of illegal kills and number of wolves killed but not recovered. A quota must take into account the impact of the breeding season hunt on the wolf population. Hunting of wolves using dogs must be prohibited. Wisconsin is currently the only state that allows the use of dogs to hunt wolves. Not only is it cruel, it is dangerous to the "loved" dogs used/trained to do this. Night hunting of wolves must be prohibited. Why is it legal to hunt wolves at night when it's illegal to do this for any other major hunt in Wisconsin? This must needs to stop. Stable wolf packs must be protected. Blanket and disorganized hunting of stable and established wolf packs can create disruptions that lead to increased conflicts with people and livestock. We need a better solution to wildlife management than, "Uh, I guess we just kill a bunch of them? That'll work, right?" The superior solution involves educating those affected (and any hunters looking to fulfill their sociopathic killing urges) about the importance of a keystone species like the wolf and why it's critical to have a healthy and robust population not just within our imaginary borders of Wisconsin, but in the greater environment of North America. Killing off chunks of existing, healthy populations is myopic, and irresponsible to the overall health of the species. Let's strive to be a leading state in holistic wolf management and promote the species rather than kill it off and disrespect the ecological balance they bring to our wonderful environment. Thank you, Adam Flogel
Lee	Hannah	Stable wolf packs must be protected. Blanket and disorganized hunting of stable and established wolf packs can create disruptions that lead to increased conflicts with people and livestock. Please protect the few remaining wolves that we have in Wisconsin! They are crucial to our ecosystem, preventing overpopulation of prey animals who can defoliate our woodlots. Further, the cruelty of the methods proposed to "regulate" wolves in Wisconsin, which include killing nursing mothers and pups in their dens with poison, guns, and explosives, is horrifically inhumane, and should not be allowed under ANY circumstances. Those people who are able to do this kind of killing to innocent animals must be monsters of heartlessness. Please do all in your power to stop this cruel and wrong-headed war on wolves. Thank you for your consideration of these comments. Hannah I march to a different kettle of fish
Sipla	Gregory	The 2021 fall/winter season quota for wolves should be 750 dead wolves. When I see more wolves than deer, something is WAY out of whack. Gregory Sipla Stevens Point, WI
Powers	Mike	Hello just wanted to say I 1000000 % support the hunting of wolves in Wisconsin. I believe there should be wolf hunts every year and thin those critters down. There killing machines to our deer , livestock, dogs, coyotes , anything they want. I deeply wish there are no wolves in wisconsin. The February hunt was such a blessing to our deer herd, a long time over do. Thank you for that I was successful enough to draw and harvest a timber wolf and super proud of my trophy and to help out the local deer herd and a few dogs and calves from getting ripped up . So everyyear I sincerely hope we can continue to harvest these wolves !!!!
Johnson	Todd	Todd Johnson 5521 Latvia Ave Wis.Rapids, WI 54494 Good afternoon, I'm not one to voice my opinion or try to influence anyone however current wolf populations is dear to me. I feel the DNR has done a very nice job with the wolf reintroduction, however I believe the current wolf population are much higher than counted. In wood county over the last 3 years I have gotten 4 wolves incidentally in my coyote traps. All were released without incident plus these wolves were in very close proximity to neighborhoods. In portage county I have trail camera pics in early summer with approximately 8 wolf pups sitting on a sand pile next to a pond. Please allow higher wolf quotas as I completely believe there are more than enough to keep them population sustained. Thank you for your work in this matter

Sabin	Dawn	<p>Wolves are a public trust asset belonging to all of us and yet in February the WDNR violated the Public Trust Doctrine. A hunt was rushed through as a result of a lawsuit from an out of state special interest group. Without Tribal or scientific consideration, trophy hunters were granted their wish to kill and it was a slaughter. The number of wolves killed exceeded the kill quota by 82%. The February hunt proved that legislative reformation is needed.</p> <ul style="list-style-type: none"> •An annual wolf hunt should not be required. The mission of the NRB and DNR is preserving and enhancing natural resources. Killing wolves does not preserve or enhance this species. •The DNR should not have to provide 24 hour closure notice as this coupled with the 24 hour allowance to report a kill makes adherence to a quota impossible. •Baiting, Hounding, Night Hunting and the use of snowmobiles all need to be banned. These type of hunting practices clearly violate fair chase ethics by taking advantage of the unnatural conditions created by the hunter. Allowing hunters to unleash packs of dogs on wolves is essentially allowing dog fighting which is illegal in all 50 states. <p>Many packs were either weakened or broken up due to the February hunt. When this happens the remaining wolves may need to resort to easy prey such as livestock. Unfortunately, as a result of the February hunt, we are now seeing more wolf depredations on livestock. 2021 WDACP Wolf Depredation Report.</p> <p>Wildlife viewing is a tourist opportunity that we should be nurturing. And yet 218 wolves were stolen from people like me who hope to hear or see a wolf someday.</p> <p>I urge you to call off the Fall 2021 hunt or, if that is not an option, set a quota of zero.</p> <p>Thank you for your consideration.</p> <p>Dawn Sabin Madison, WI (Seasonal Resident of Oneida County)</p>
Ravetta	Renee	<p>To Whom it May Concern:</p> <p>Thank you for the opportunity to comment on the development of a fall 2021 wolf season quota. As an apex predator, wolves have an important role in Wisconsin beyond just being a resource for hunters. It's important that all citizens have an opportunity to weigh in on the management of the wolf population in Wisconsin.</p> <p>Given the uncontrolled overharvest of wolves in February 2021 (grossly over the DNR established quota), I would argue that an appropriate quota for the fall harvest is ZERO wolves. The quota must be based in science and an analysis of the impact of the February hunt on the population. This has not been possible to date. The DNR must go back to the drawing board to establish an appropriate target population before allowing hunting of wolves to resume.</p> <p>Further, night hunting and hunting with hounds must be prohibited. Finally, hunters must report wolves taken within far less than 24 hours and must present the carcass to the DNR for inspection.</p> <p>Thank you for your consideration,</p> <p>Renee Ravetta</p>
Loomans	Sandra	<p>As a citizen of Wisconsin, a registered voter, and a person who has respect for all living things, I find wolf hunting reprehensible, barbaric, unnecessary, and completely unacceptable. Please do not let February's atrocity be repeated. The land, water, and animals of Wisconsin, including Federal forests, belong to ALL the people, not just hunters and trappers. Wolf management programs that include hunting seem to be governed predominantly by special interests and not best available science.</p> <p>The impact of the February 2021 wolf hunt has not been fully analyzed. Until the impact of the over-kill can be studied, no further hunting or trapping of wolves should be allowed. The poorly planned and rushed February hunt caused significant collateral damage to established packs during breeding season. (See: WI Greenfire's The February 2021 Wisconsin Wolf Hunt: A Preliminary Assessment) for more details. The DNR has not calculated overharvest in quotas. That has led to over-kill of the wolf population, particularly in the recent February 2021 hunt. The February 2021 wolf hunt did not honor treaty, land, and heritage rights of Native tribes. I support a ZERO quota for the fall wolf hunt.</p> <p>Wolves are not eaten by hunters, therefore the hunt is only "thrill kill" for trophies. Livestock depredation is frequently given as the main reason wolves should be hunted -- but the percentage of livestock actually killed by wolves is relatively small. Previous Wisconsin Department of Natural Resources Wolf Management Plans contained effective measures for "controlling nuisance wolves and reimbursing landowners for losses caused by wolves" without the use of hunting. Hunting wolves destroys pack order and the ecosystem. As an apex predator, the wolves help to control CWD by using weakened deer as a food source. It's NOT a "hunter's rights" issue -- more and more ethical hunters are speaking out AGAINST trophy hunting and trapping of wolves. Please see: https://HuntersForWolves.org/, the website of Hunters For Wolves, for more details. Wolf hunters and hunters with hounds often violate the rights of private property owners. Hunting hounds do not know property borders; the hunters do not respect them.</p> <p>Traps, snares, cable ties, and packs of hunting hounds create conflicts and pose dangers to other users of public lands, to private property owners and to their pets.</p> <p>Depredation payments currently in place can adequately compensate ranchers and farmers. Depredation payments should NOT be paid to hounders who purposely put their animals in harm's way.</p> <p>To our shame, Wisconsin is the ONLY state in the country to allow the use of dogs to track and trail wolves, with nearly unrestrained in-the-wild training of these dogs. This is NOT the type of leadership that reflects well on our state! Hunting wolves with hounds is just a form of "legalized dog fighting." Hunting at night with dogs, ATVs and snowmobiles is disruptive to the environment and to people who live in rural areas. Pursuing wolves with ATVs, snowmobiles and hounds—chasing the wolves to exhaustion—is unethical, cruel, and is not "fair chase" hunting.</p> <p>I have changed the way I recreate in Wisconsin NOT because of wolves—but to avoid conflict, noise, disruption, and FEAR of hound hunters and their untethered hounds.</p> <p>Thank you.</p> <p>Sandra E. Loomans 2215 Cutoff Rd. Weston, WI 54476</p>
McLellan	Ann	<p>Hello,</p> <p>Please consider input by all people; Indigenous people, scientists, ethical hunters, women, etc.</p> <p>Wolves are a Keystone Species that keep nature in balance. A PBS documentary about Keystone species said: "a species on which other species in an ecosystem largely depend, such that if it were removed the ecosystem would change drastically." Therefore, no wolves should be hunted and trapped., we need more wolves.</p> <p>Thank you</p> <p>Ann McLellan</p>

Davidson	Joel	<p>I am writing on behalf of the Dane County Humane Society (DCHS) to urge that the Wolf Harvest Advisory Committee recommend a suspension of the fall wolf harvest. Last spring's wolf hunt was mismanaged and resulted in a slaughter of wolves, resulting in nearly 20 percent of the state's wolf population being killed in just three days. Under no circumstances should this have been allowed to happen. The way the wolf hunt was permitted to happen did not reflect the thoughtful legacy of scientific wildlife management practices that the Wisconsin DNR has practiced for many years. A wolf harvest that resulted in an over harvest by 83 per cent over the quota is not the Wisconsin way. Until more is known about the impact of last spring's hunt on the Wisconsin wolf population, particularly the loss of breeding females and males, and until more scientific management principles can be applied, the wolf hunt should be suspended. This can be done by the DNR by using its authority to prevent the kind of negative outcomes experienced from happening again. DNR retains authority to establish quotas and, within statutory limits, to regulate the form, timing, and methods of harvest.</p> <p>In the spring of 2020, the US Secretary of Interior indicated that the US Fish and Wildlife Service (USFWS) was going to delist the wolf from the Federal Endangered Species list at the end of the year. While it was not a final decision, it should have triggered DNR doing contingency planning to have a season management plan in place. Several conservation organizations, including the Wisconsin Wildlife Federation, asked the DNR to engage in a stakeholder planning process for such a season. On November 2nd, the USFWS did delist the wolf with an effective date of January 4, 2021. Even at that time, DNR did not go forward to do any planning for a January season even though it was encouraged to do so by the Natural Resources Board and several organizations. January 4th came and according to the statutes, the period for a wolf season was open. An out-of-state group, Hunter Nation, sued the DNR to open the season, DNR lost the lawsuit and had to establish a season in one week. If DNR had started planning over the summer and fall or at least in November, it would have been able to get valuable stakeholder input, including doing the necessary consultation with the Ojibwe tribes.</p> <p>To compound the situation DNR proposed a permit ratio of 10:1 wolves for the season. That ratio was based on the 2012-2014 harvest seasons. Those seasons however had a minor period of time with harvest using dogs due to the fact that the season was normally closed before the end of the gun deer season when the hunting with dog season starts. Harvesting with dogs is not only effective, it can be done rapidly which meant that the 24-hour season closure period was not effective in preventing an over harvest. To make it worse, the Natural Resources Board doubled the permit to wolf harvest ratio to 20:1, though the actual number of licenses sold represents a 13:1 ratio of hunters to each of the 119 wolves approved for harvest. In all, 1,548 licenses were sold. At that point, it became most likely that there would be a harvest in excess of the state portion of the quota. According to Wisconsin's Greenfire--Voices for Conservation, "It will be difficult to evaluate the impact of the breeding season hunt on the wolf population. During the three most recent wolf seasons (2012-2014), population data was gathered after the hunts took place. For the February 2021 hunt, most of the seasonal population data was collected before the harvest, confounding the ability of biologists to make accurate post-hunt population estimates. It won't be possible to fully assess the impact of the February 2021 hunt on the distribution and abundance of wolves until annual surveys are completed in late 2021/early 2022, after quotas have been established for the legislatively mandated fall 2021 hunt."</p> <p>As far as the issue of hunting wolves with dogs, the DCHS is firmly opposed to this. Wisconsin is the only state in the nation to allow the use of dogs to track and trail wolves, with nearly unrestrained in-the-wild training of these dogs. Pitting dogs against wolves is akin to animal fighting, which is prohibited in Wisconsin. It is counter to one of the values is support of our mission. That value is to "hold central the welfare and care of animals." Dogs fighting wolves, and each other, does not support this value. As other organizations have expressed publicly, hunting wolves with hounds is just another form of "legalized dog fighting."</p> <p>With these thoughts in mind, I respectfully, on behalf of the DCHS, request that the fall 2021 wolf hunt be suspended. Thank you for your consideration.</p> <p>Joel Davidson Chair, Legislative Committee Dane County Humane Society 608-225-8644</p>
Bemis	Mitch	<p>I believe that the season should be split in two category's. The first season being for trappers/ callers etc. The second season should come later in the year for the houndsman and women that wish to pursue a wolf using dogs. It would be similar to the current bobcat plan. As far as the quota goes I believe Wisconsin needs to have a more up to date study on current wolf populations. Also the original plan for the gray wolf population was supposed to be 350 individual animals. The sportsmen of this state would like to see that number and promise met.</p>
Zagrodnik	Dorothy	<p>Dear DNR, All my life I have lived in Wisconsin and enjoy nature. I am very upset about what happened here in Wisconsin in February. Wolves were chased down to exhaustion by hunting dogs during breeding season. In 3 days probably 1/3 were wiped out by trophy hunters. Wisconsin should not be sanctioning animal fighting by allowing hound hunting of wolves...dog fighting is illegal. What happened is horrific, barbaric, and inhumane! These are Gods creatures that deserve to live as much as humans. I am embarrassed by what happened here! I have had the opportunity to see a few wolves while traveling in northern Wisconsin over the past 15 years and it is quite an experience that I hope will happen again. I will be very sad if another incident like February happens again! I love dogs too and most came from the gray wolf. Wolves live in family groups and rely on each other to survive. There should not be a fall wolf hunting/trapping season because wolves were already slaughtered (not hunted!!!) and legislation is mandated to one hunt per year. The impact of this hunt on wolves is not known, especially pack disruption. Wolves will do whatever they can to survive...like go for easier prey. Wolf depredations are occurring now in Wisconsin after the Feb 2021 wolf hunt at an increased rate. The majority of Wisconsin citizens support wolves. Wisconsin needs to build a wolf management plan that includes public input and scientific analysis and deliberate processes as required by law. Wildlife belongs to all citizens of Wisconsin. Wolves are keystone predators and balance nature. This is the 21st century not the nineteenth! I support zero quota!! Sincerely, Dorothy Zagrodnik</p>
Vendela	Shayna	<p>During the first year of our last series of wolf hunts, in 2012, the population was 815, up over 30 wolves from the year before, 117 wolves were harvested (from a quota of 201). In 2013 the population was only down to 809 from the previous year and 257 wolves were harvested, Similarly, to previous years population was estimated to be 809-834 in April, 2013, at a minimum due to the nature of the count. The quota for 2013 was exceeded by 6 wolves and was 251 (HSUS). At the time of the 2012-13 hunt an approximate 28.22% of the minimum (2012) population of Wisconsin wolves were hunted, according to the DNR in their post delisting monitoring report, "The observed decline of 0.74% between year minimum counts suggests observed mortality levels did not significantly impact the population." The next season, 32% of wolves were harvested (2013-14). The last year for wolf hunting in Wisconsin was 2014 and 154 wolves harvested out of a quota of 156. In that year, and final year before our most recent delisting, there was a 23% harvest rate. In the 2015-16 winter monitoring season the wolf population "In April, 2015 the statewide minimum wolf population count was 746-771 wolves, an increase of 12.5% from the previous year". In the past wolf hunting has not caused a drastic decline of our wolf population, every single hunt before the February season had a higher quota than did ours.</p> <p>I propose that the quota for the November 2021 wolf season stays similar to the February one with the intent of maintaining the wolf population, until the management plan can be rewritten. The current management plan and goal for the state calls for 350 wolves from a suspected carrying capacity of 500 animals; perhaps that is their social and biological carrying capacity combined however it is not their biological carrying capacity as it has been greatly exceeded and even doubled by Wisconsin wolves with no natural cutoff in sight. Wolves are one of the most anthropomorphized animals in the world, it is false that they will not breed if their mate is killed; places that study wolves like Voyageurs wolf project have proven that. Wolves are pack animals, but a pack includes parents and offspring, it is not as intricate of a family as the general public believes. If one of the members is removed, it is most likely replaced. In the case of all of our wolf seasons the majority of harvested animals have been younger than breeding age. Over half of the animals the first year with only 3 females being taken that were in prime breeding age according to the DNR. Even if those 3 animals CAN breed it does not mean they will, as not every wolf can find a mate. Starting the season in November instead of February like was implemented this year will also help, due to the timing of the animals breeding season.</p> <p>Wolves have been listed and delisted for the past 40 plus years, despite hitting recovery goals in every state that set them in the WGL DPS wolves remained on the list for over a decade after. This caused extreme frustration in groups where wolves live and come into contact with people, such as rural communities, on our public lands where people fear for their dog's lives, and on farms. When wolves were put on the endangered species list and the recovery plan was formed, they were supposed to be delisted at 250 animals, they were supposed to be listed similarly to how Minnesota was and listed as threatened in Wisconsin at just 80 animals. We had over 10x that number in Wisconsin for the last decade, at a minimum, with no listing change.</p> <p>While wolves remain off the endangered species list it is the departments duty to work towards a regulated wolf population and allow hunting of the animals just as the plan stated for them to be a fur bearing animal at a certain population (that number was exceeded over a decade ago). Protecting wolves past recovery goals because of feelings is completely contrary to science, and previous hunts in Wisconsin have shown us that our wolves, at a much lower population than they are now, can sustain a harvest greater than what happened in February. Do not let out of state feelings reduce our November quota, or make it nonexistent all together because of this. In addition to Wisconsin sustaining a large harvest, wolves in the Northern Rocky Mountain DPS never got relisted like ours did and so have been hunted this entire time. They have endured harvest rates of over 20% without drastically hurting their wolves genetic variability or even stopping those wolves from dispersing. Wolves are now being found in Colorado along with successful packs with pups that dispersed from the other NRM states, even though Colorado has voted to reintroduce wolves they are having them disperse there naturally from the hunted populations.</p> <p>The past history of Wisconsin hunts and the data from out west proves that wolves can be hunted in a sustainable manner. Individual populations of wolves can sustain harvest rates over 20% with no threat to their survival as a species. With regulated hunting the dnr receives income that helps them pay for the depredations that wolves are causing. Due to the nature of the last hunt hound hunting was favored, however that will not be the case with any future hunts as long as the department schedules them on time as the law says. not when they want to.</p> <p>Thank you for taking the time to read. Shayna Vendela B.S. in Conservation & Environmental Planning</p>
Essman	Rich	<p>I support a Fall 2021 wolf hunting season and believe the quota she be representative of sound science current management goals.</p>

Schultz	Bob	State wide management goal was set at 350 a long time ago. Push the quotas this fall to get to that goal. It is time to lower the population to cut down on the problems they are causing for landowners, farmers, pet owners, hunters, etc. Bob Schultz 223204 Laurel Rd Wausau, WI 54401
Makela	Kent	1.Prohibit the use of dogs in the wolf hunt. Wisconsin is the only state in the country to allow this deplorable practice. 2.Eliminate night hunting. Doing so would make warden's job easier and the public safer. (Remember the hue and cry when Native Americans wanted to deer hunt at night?) 3.Forbid the use of electronic calls. Less technology moves us closer to "fair chase" ideals. 4.Restrict the use of traps. Walking up to a trapped animal and shooting a so-called "trophy" animal diminishes the "trophy" part. 5.Require in-person registration with a tag to a DNR employee or other wild-life professional. Many, if not all, of these requirements are already in practice in western states that wolf hunters point to but seem to ignore, focusing only on the favorable aspects of these western state regulations. Wolf Country Resident, Kent Makela Maple, WI54854
Kammerud	Lance	STOP THE WAR ON WOLVES AND THESE SENSELESS HUNTS AND KILLINGS!!! WOLVES AND HUMANS HAVE CO-HABITED FOR HUNDREDS OF YEARS!!! STOP THE HUMAN GREED!! WOLVES HUNT AND KILL FOR NEED...HUMANS HUNT AND KILL FOR GREED!!
Richardson	Deanna	To Whom it May Concern: I was deeply concerned about how the wolf hunt took place here in Wisconsin in February. There did not seem to be a coordinated effort to appropriately track the number of wolves killed through the state. Hunting practices that will have negative impacts on the long-term health of the wolf population must be prohibited. The precautionary principle must be exercised when setting a quota to prevent more harm to the wolf population. Critical data is missing on pack disruption, pup survival, number of illegal kills and number of wolves killed but not recovered. A quota must take into account the impact of the breeding season hunt on the wolf population. Respectively submitted, Deanna M. Richardson 7048 West Lima Street Milwaukee, WI 53223
Samels	Cynthia	Dear NRB: As a Bayfield County, Wisconsin resident concerned with wildlife conservation I urge the board and the DNR to suspend wolf hunts for the foreseeable future. The infamous, now world renowned two day February hunt (slaughter) blew past the official quota and upwards of 300 wolves were killed. This frenzy was an absolute embarrassment to all Wisconsinites save for the bear hounders whose hatred and retaliatory motives were all but plastered across social media. Wolf experts and science support the idea that Wisconsin wolf populations can and should be higher than 1200, and the effects of allowing a hunt during mating season won't be known for years. The unusual and higher livestock depredation numbers since the February slaughter point to behavior of juvenile and lone wolves who have suddenly found themselves without their families. Despite the increase most likely caused by the mismanaged hunt, depredations are relatively few and are reimbursed by the state. Most ranchers have learned to coexist and do not support wanton killing of wolves. Hunting with the use of hounds, GPS tracking devices, snowmobiles, and baited traps defy the very notion of fair chase and should be deemed illegitimate means of taking wildlife in Wisconsin, period. Most Wisconsinites find the use of dogs to be reckless, dangerous, and unethical. Finally, it is time for all of you to call for former NRB Chair Prehn's immediate resignation. His mere participation renders this entire committee's actions and decisions illegitimate. Your silence speaks volumes to all of us. The world just witnessed the carnage one group of individuals can and did inflict on a species, a group whose loyalties appear to lie in the hands of WBHA. Zero quota. No November hunt. Cynthia Samels
Bradley	Marya	I am writing to urge that the Wolf Harvest Committee set the Fall Wolf Harvest quota at 0. I, like many other Wisconsin citizens, witnessed the February 2021 Wolf hunt with utter horror, grief and shock. It is incomprehensible to me that despite the fact that there has to date been inadequate analysis of the effects of that outrageous slaughter (of at least 216 wolves in a mere 60 some hours) on the wolves that yet live in the state, there should be any hunt of wolves this Autumn at all. It is incomprehensible, because the lack of that analysis means there can be no scientifically (and needless to say ethically) sound way to set a quota for this Autumn. This lack of commitment to science in the management of wolves violates the mission statement of the DNR of Wisconsin and so violates the public trust. This second matter I raise is important; the decision-making around the February hunt was, itself, not transparent and sacrificed the actual will and interest of the majority of Wisconsin's citizens in favor of the narrow and ideologically-driven interest of trophy hunters, gun enthusiasts and out-of-state trophy hunting organizations. The great majority of all those who spoke, commented, called and wrote regarding the wolf hunt were strongly opposed to the hunt, including tribal members from the state. This undemocratic bias towards a small interest group further undermines the mission of the DNR and its management of wildlife on behalf of all of us who live in Wisconsin. As you may well be aware, most citizens now are not hunters and certainly not hunters of predators we cannot eat. Rather, most of us cherish the wild places in Wisconsin that yet remain because we seek to experience the beauty and mystery and power of nature and take enormous joy and solace from our encounters with all of the wild species that make up the fabric of life we ourselves once knew more intimately. I have cared about wolves since I was a small child and learned about their being driven to the very brink of extinction by bounty hunters in this country back in 1971. I was devastated when I learned of this and vowed to do all I ever could do to help protect them from the irrational and wanton killing of them ever again. So you can well imagine how sickening it is to learn that now, some 50 years later, there is once again a small but zealous faction of people who are eager once again to kill wolves for the pleasure they take in killing them. I ask that you recognize that this small group is not the future for the wealth and prosperity of Wisconsin; the real source of wealth the DNR can count on must come from the majority of Wisconsinites and tourists who are drawn to the wild places here to encounter nature and wildlife and are willing to contribute generously for the gift of the joy and restoration such encounters offer. The wolves matter to all of us, not just those who are hostile to them. Most of us are fascinated by their intelligence, their highly evolved social structures, their extraordinary beauty and their deep expression of the wild soul's resonance with something vast and mysterious in the universe. I urge you to recommit to the mission of protecting and preserving the wolf in our state and cease to allow the lawless slaughter of them (by means that are unethical and unique to the shame of this state--such as night hunting, hound hunting and driving wolves to exhaustion only to kill them) and to recommit to a science-based stewardship of their presence here. Finally, I urge that the decision making around this hunt be based on thorough analysis of the last wolf hunt and a respectful recognition of the will of tribal leaders, scientists, conservationists and the majority of Wisconsin's citizens. The decision you make about this hunt will affect the future of wolves and all of us who value them and their place in the web of life as well as reveal the true character and commitments of this State. I hope deeply that you will act wisely and set the quota for this Fall Wolf Season at zero. Thank you for considering my comments.
McCormick	Joan	Hello, I am writing to you to implore you to stop the Fall Wolf Killing season. Wolves that have established packs need to be left intact. Hunting wolves with dogs is barbaric. We, as a nation reestablished Wolf packs. Why are we now hunting them down!!!! The pose to threat to us. Please stop this barbaric hunt!!! Sincerely, Joan McCormick Milwaukee, Wisconsin
Bell	Margaret	To whom it may concern The WDNR did not follow its mission statement in regards to the February 2021 wolf hunt and the state violated the Public Trust Document. The public trust document says that wildlife belong to all citizens of Wisconsin and they are held in trust for the public. A healthy and thriving wolf population is essential to a healthy ecosystem. However, based on the disruption and biological impacts of the February 2021 hunt during the wolves breeding season, it is estimated that 60-100 of Wisconsin's wolf packs may lose ALL pup population!! This is a heartbreaking and horrific impact which is unconscionable at a time when preservation of our planet and its wildlife should be of utmost concern. Determining the quota for the February hunt should have been an inclusive process with input from tribal leaders, interested citizens and sportsmen and women. It should also have been based on scientific analysis and deliberative processes as required by law. None of this occurred with the February hunt so the quota, season dates, and reporting structure did not ensure that a sustainable population of wolves would be maintained, and unfortunately, the fall hunt is following the same non-inclusive and non-scientific process. This is not wolf management, it's wolf slaughter, and it's not acceptable. Margaret Bell

Garcynski	Rosemarie	No NIGHT hunting and no DOGS!!! Wisconsin is the only state that allows dogs. Chasing and baiting is uncalled for. Stable wolf packs must be protected. Pups must be protected. Why is hunting so offensive? It's because of the uncontrollable way the last one was held & the DNR can't be trusted that it won't happen again. My trust in the DNR is gone! Do the right thing & bring trust back again. Rosemarie Garczynski
Strangstad	Lyn	<ul style="list-style-type: none"> •Wolves are a natural, native, and important part of our ecosystem. Any practices regarding wolf hunting must consider the well-being and maintenance of our wolf population. The recent wolf-hunting season was extremely deleterious to the WI wolf population. Having a season during late winter/spring, when wolf pups are likely to be born or have just been born, is an extremely poor practice, having a negative effect on the entire population and endangering wolf survival overall. •Hunting practices that will have negative impacts on the long-term health of the wolf population must be prohibited. The precautionary principle must be exercised when setting a quota to prevent more harm to the wolf population. Critical data is missing on pack disruption, pup survival, number of illegal kills and number of wolves killed but not recovered. A quota must take into account the impact of the breeding season hunt on the wolf population. •Hunting of wolves using dogs must be prohibited. Wisconsin is currently the only state that allows the use of dogs to hunt wolves. •Night hunting of wolves must be prohibited. <p>•Stable wolf packs must be protected. Blanket and disorganized hunting of stable and established wolf packs can create disruptions that lead to increased conflicts with people and livestock. Finally, quotas must be respected, including limiting the length of the hunt to far less than initially anticipated, when it becomes apparent that too many wolves are being killed. This failed in the last hunt and must be ameliorated in future hunts. Thank you for your consideration of my comments. Lyn Strangstad Mineral Point WI</p>
Lind	Lisa	I find it absolutely appalling that the agency that is mandated to manage the natural resources of Wisconsin for ALL of us, not just hunters and farmers, can screw up as badly as you did last fall. It is one thing to open hunting on a species that is used for food for humans and quite another to have a hunt because some people feel the animal is the boogey man and doesn't deserve to live. I am outraged and saddened to again be a laughingstock to the entire country. This needs to stop and it needs to stop now before you mess up another animal's survival. Lisa L Lind Oshkosh WI
Sorenson	Margaret	With the last wolf hunt so brutally clear in my mind I felt that I had to send you my deep concerns about continuing on with additional hunts. Not only did they kill twice as many wolves as you had allotted, the techniques that were used were inhuman to say the least! The hunters implemented baiting, dogs and even chasing the wolves with snowmobiles to exhaustion, I can't find one study that supports these practices. Honestly, with how badly this "kill" was managed, I can't believe you are even considering having another one this fall. You have no idea how many illegal kills were done, no idea on what this really did to our population here... I am old enough to remember the wolves being hunted and hung up for all to see in SE Wisconsin... the sight was horrid and I still vividly remember how brutal it was... please don't make my grand daughter have to live thru that too. Stop the hunt! Looking Forward Margaret E. Sorenson Burlington Wisconsin.
Brunner	Linda	Sir or Madam, please consider these comments re the above: I grew up in WI and the bulk of my family lives in WI. My sister recently had a wolf encounter when hiking and was very excited about it and in awe of their beauty and majesty. It is a tragedy that these amazing animals are being considered for future harassment and hunts. For that reason alone, the sheer beauty and grace of the wolf, No should be the answer to any future hunts. The majority of WI citizens are non hunters so you have no ground to stand on when it comes to supporting the clamoring of a hunting population which is reported to be 4% of the population. Indiscriminate killing of wolf packs often eliminates the mature leadership and creates further livestock predation. As is reported to have happened after the hunt this last February in WI. Consult reputable scientific research re the sophisticated family structure of a pack, it's essential place in a habitat and finally the responsibility of livestock owners to protect their herds in non lethal ways. We as a species need to let others live and act responsibly when coexisting in forested areas. In a nutshell, wolves are valued and hunts should not be increased in WI. If anything, they should be ended and livestock owners held responsible for their charges. Linda Brunner Green Thumb Farm Stockton, MO.
Walker	Katie	Please stop wolf hunting in Wisconsin. It is a cruel and barbaric practice that is a backwards policy that needs to be ended. Hunting practices that will have negative impacts on the long-term health of the wolf population must be prohibited. The precautionary principle must be exercised when setting a quota to prevent more harm to the wolf population. Critical data is missing on pack disruption, pup survival, number of illegal kills and number of wolves killed but not recovered. A quota must take into account the impact of the breeding season hunt on the wolf population. Please end any wolf hunting in Wisconsin. We are better than that. Thank you! Katie Walker Oak Creek, WI
Wolf	Mark	Don't hunt wolves unnecessarily!!! Regarding wolves in Wisconsin: <ul style="list-style-type: none"> •Hunting practices that will have negative impacts on the long-term health of the wolf population must be prohibited. The precautionary principle must be exercised when setting a quota to prevent more harm to the wolf population. Critical data is missing on pack disruption, pup survival, number of illegal kills and number of wolves killed but not recovered. A quota must take into account the impact of the breeding season hunt on the wolf population. •Hunting of wolves using dogs must be prohibited. Wisconsin is currently the only state that allows the use of dogs to hunt wolves. •Night hunting of wolves must be prohibited. •Stable wolf packs must be protected. Blanket and disorganized hunting of stable and established wolf packs can create disruptions that lead to increased conflicts with people and livestock.
Broek	Juliana	Because of the horrific number of wolves killed last year, I feel the limit this fall should be reduced by the amount over killed last year. Tribal leaders must be consulted, as is the law. Dogs and snowmobiles should be banned from use in the chase, hunters fined, wolf pelts confiscated. I do not believe wolves should be hunted at all, because they are necessary to the balance of nature. I am a hunter, but there is no honor or trophy in last year's hunt. Juliana Broek 608 924 1331

Simpson	Sue	<p>It is unbelievable to me that any govt dept and staff responsible for the protection of our State and Nation's animals and natural resources that they -- and humanity -- depend on for survival -- would allow any improper hunt of wild animals -- already trying to survive in humanity's world of buildings and concrete and humanity who leave nothing sacred or protected for the survival of our animals and nature's ecosystems balances.</p> <p>Use of numbers of hunting dogs that are trained to run endlessly in their search for wild animals, or archaic and barbaric steel traps that are pathetic and insane in today's world to use to trap and horrifically torture innocent animals that could be trapped for days much less hours in excessive illegal and criminal pain, or use of technology and snowmobiles or any other speed transportation to round up animals to run them to exhaustion with no chance of survival -- is insulting to humanity and degrading to our supposed high standards, ethics and morals built over years of history to do what is right in our human and democratic responsibilities to protect animals and natural resources that deserve their rights to good, happy, long and successful lives in this world with our voices of security and protection.</p> <p>How can anyone, especially hunters and those interested in the beauty of wild animals, defend any of the above actions.</p> <p>AND, the numbers of wolves taken during that criminally and hastily allowed hunt was pathetic and illegal. The hunt should never have been approved since farmers and residents are reportedly able to kill any threatening animal to their human or animal/livestock's lives already. So, any threatening animal could be eliminated by this existing law already. No special hunt was necessary for this reason alone.</p> <p>And the DNR's responsibility for approving an allowed yearly hunt is based on appropriate and safe numbers of each species of animal for their species health and safety in the numbers they require to survive in the wild.</p> <p>IF we don't stop the insanity of the DOT building endless, unnecessary roads/highways and stupid roundabouts, and especially through our survival kits of farms/farmland, prairies, wetlands and forests, we will all be unable to return the earth to its safe and needed ecosystems balances for survival, and global warming will take over.</p> <p>Why is that so difficult for an educated humanity -- that we pride ourselves in our education systems (hopefully worldwide education systems of proper, and excellent information on which to base good decisions and survival on earth and the waters and skies) -- to understand these simple basics of security and protection of our earth, waters and skies????</p> <p>Additional rationale for stopping criminal and illegal wolf -- and other wild animal hunts follows. Our DNR staff should be protecting and providing security for our animals and nature in the need for hunts, #s to be carefully limited and monitored in any hunts, protection of their natural habitats to stop raiding forests and waters that our animals need forever, for pathetic building whether residential or commercial that should be forever protected grounds for our animals to survive in this world, AND insane pathetic endless building of roads/highways and dumb roundabouts, and never take animals that are in the breeding or birthing seasons so their species can survive. Today's world is difficult to survive in for humans, much less animals that we continue to steal their natural habitats that we all need to survive.</p> <p>Hunting practices that will have negative impacts on the long-term health of the wolf population must be prohibited. The precautionary principle must be exercised when setting a quota to prevent more harm to the wolf population. Critical data is missing on pack disruption, pup survival, number of illegal kills and number of wolves killed but not recovered. A quota must take into account the impact of the breeding season hunt on the wolf population.</p> <p>Hunting of wolves using dogs must be prohibited. Wisconsin is currently the only state that allows the use of dogs to hunt wolves.</p> <p>Night hunting of wolves must be prohibited.</p> <p>Stable wolf packs must be protected. Blanket and disorganized hunting of stable and established wolf packs can create disruptions that lead to increased conflicts with people and livestock.</p> <p>Please help protect our animals and natural resources, and all those in govt depts or staff who are responsible to protect and secure animals' and nature's rights must do their jobs and stand up for them, because there are those who don't care about about the animals and nature, and govt staff are the leaders for that security representing all citizens in this country.</p> <p>Taking matters into citizens' own hands will result in their being charged with illegal activities for trying to defend those who depend on our human voices for animals and nature.</p> <p>Thank you and respectfully, Sue R. Simpson</p>
Wilhorn	Jennifer	<p>I saw this post from a friend and it states how I feel about this so much more eloquently than anything I could have written.</p> <p>Our Hunting Tradition comes with responsibility. We cannot cross the line into pure animal abuse. Ethics and sportsmanship for the Wisconsin Hunter all went out the window in Feb. There used to be a hunters code of ethics, a promise of fair chase and a standard to respect the animals we hunt. Out-right cruelty to both wildlife and hunting dogs has no place in The Wisconsin Hunting Community. Bear hounding is brutal, coyote hounding is brutal and now they cranked that brutality up a notch by pitting packs of hounds against the wolf. It is an affront to our great State of Wisconsin; it is the back door to legal animal fighting. It should have brought shame, not silence from the Wisconsin Hunting Community.</p> <p>Please stop the hounding. Hounding is not hunting. It results in terrorizing of the animals, sometimes running them to death or cornering them in vicious fights that are nothing more than legalized dog fighting. No other state with wolves allows this form of hunting. Stopping this type of hunting will also eliminate the need to pay for these "hunting" dogs that are killed in known wolf territories.</p> <p>Thank you for your time, Jennifer Wilhorn</p>
Jerschefske	Jim	<p>Please record that I am against the killing of wolves in Wisconsin.</p> <p>James Jerschefske 10902 W. Grange Avenue Hales Corners, WI (414) 573-4059</p>
Collins	jane	<p>It's common knowledge, Montana, Idaho and Wyoming have destroyed most of their wolves. Please stand to protect the wolves. A lot of funding has been spent on Gray Wolf Recovery. Advocates and scientific experts have worked tirelessly for this cause. Please no 2021 wolf hunt. No more trapping. Thanks, Jane Collins</p>
Butts	Dean	<p>This is not happening again</p>
Clay	Cody	<p>If the wolf quota was met in just a few hours of hunting this year doesn't that tell you the number of wolves are higher in the state than estimated numbers show? Keep the Quota numbers the same if not raising it. It would be nice to be able to deer hunt "up north" again in the future.</p>
Zamora	Margarita	<p>We are longtime citizens of this state, recreate all over our state, buy park stickers and trail passes annually, participate in Conservation Congress matters, etc. But not only are we adamantly opposed to the Fall wolf hunt, we also want to know what the WIDNR, which is charged with protecting our natural resources, is going to do to prevent another such debacle. It was an abominable spectacle reviled nationwide and a gross regulatory failure on the part of the DNR.</p> <p>It's time to admit the DNR can't control what hunters from in and out of state do when turned loose on WI wolves essentially unmonitored and unfettered. Stop the hunt!</p> <p>Zamora-Green family Verona, WI</p>
Berigan	Nick	<p>Any continued high volume killing of wolves as has happened in the earlier "season" will reinforce the image of Wisconsin as a state full of reactive, unsporting, inhumane fools. Please do not give in to the minority of voices clamoring for this reactive purposeless and unscientific nonsense.</p> <p>Nick Berigan Madison</p>
Minnick	Terri	<p>I adamantly oppose any more killing of OUR Wisconsin wolves. We are not all hunters and a small number of special interests should not decide about killing mass numbers of our States' wolves.</p> <p>Anyone can see what happens when haters/unscrupulous hunters are turned loose with all means possible to kill our wolves...to see how many they can get forgetting numbers that were allowed. This should not be allowed again and especially so soon after the last slaughter.</p> <p>Dr & Mrs TV Minnick Bobidosh Lake, LDF, WI 54538</p>
Haavik	Kristof	<p>The virtually unlimited hunting of wolves is wrong. It will push them back to the edge of extinction from which they were so slowly brought back to current levels. Wolves should be protected, not destroyed.</p>

Brinks	Kathleen	<p>Dear Sir,</p> <p>Wolf's are a keystone in keeping our Nature in check and we need every wolf we have. Please do not allow Wolf hunt's to happen. It is cruel and unnecessary . If the Farmer's can't keep their cattle in check that is their problem Wolves hunt the weak and old and keep the herd strong. If anything the farmer's or cattle ranchers should be thanking them for their help in keeping their herd strong.</p> <p>Did you know that if you counted every animal species on this planet and lump them together for count that humans count would be higher. Their are more humans on this planet then there are of animals that in it self is scary and sad. I would rather live in a country that loves the animals and what they contribute to our world then one that wants to kill and erase them from existence. If you ever want to promote Tourism in your state keeping wolves alive and a vital part to getting people to visit and make money for your state. Wolves live in FAMILIES like ours. Think about that the next time you look at your son or daughter or grandkids how would you feel if people were on the hunting season.</p> <p>Wolves do not have a Grocery Store to buy their food they have to hunt to eat and keep their families alive. Can you imagine having to do that every day for your family instead of having a steady job that makes money so you can stroll down the supermarket with a cart and place food in your cart to buy for your family . They don't have that luxury as we do. Instead of being Cruel in this World let's make it a Kind and Loving and Understanding World and let them live. They helped us find this Country . Lewis and Clark had Wolves leading them the way across our great nation. Show an act of kindness and let them live . They were our scout's then and we owe them Thanks not destruction. Give them Peace to live and Understanding</p> <p>Thank you Kathleen Brinks</p>
Metoyer	Genie	<p>Please, please, please, please, please, please, please, please, please, please, please, please, please, please, please, please, do not allow the wolf hunt this fall or else make the quota zero. Our eco system is crumbling. I know it seems like the hunters are the majority, but they're not....We just don't speak up enough for our wolves!!</p> <p>Thank you so much, Genie Metoyer Richford, WI</p>
Michalek	Douglas	<p>To the committee,</p> <p>The first time I saw a wolf was in Alaska in 1985. It is a memory I will never forget. Seeing a wolf in the wild was always a dream I had since I was young. At that time I believed that Wisconsin would never offer me the same opportunity.</p> <p>In 1986 I started volunteering at a place called The Timberwolf Preservation Society in Franklin WI. There I learned about how important wolves are to maintaining a healthy environment. At that point I also learned that wolves were making a comeback to our state. I was thrilled to learn that and then I had hopes of seeing a wolf in Wisconsin. I still have hopes that one day I will. But after this last hunt, I'm not so sure I ever will see a wild wolf in WI.</p> <p>The last few years I have gone to Minnesota in hopes of seeing and photographing wolves because there is a better chance of seeing wolves there. I believe if the State of Wisconsin would see the value the wolves have on tourism, you may reconsider your views on wolves. They are not here for a few hunters that want to hang a trophy on a wall. Wolves have more value than that.</p> <p>Also please reconsider the Fall hunt due to the fact that we don't have an idea on how this last hunt affected the wolf population. At least wait until all the science and facts are in before proceeding with the hunt. I love this state and all the experiences it can offer from fishing, camping, ethical hunting and all the other outdoor activities. There is no ethical reason to hunt wolves, so please don't make the wrong decision.</p> <p>Douglas Michalek 355 N 63rd St Milwaukee, WI 53213 414-510-3615</p>
Weidemann	Dale	<p>Endangered Resources license plate - an extra \$15 plus an annual \$25 donation to the DNR. "SAVE THE WOLF." DNR Wolf kill license - \$100 "KILL THE WOLF." Are we being harvested by the DNR or is it simply hypocrisy? Dale Weidemann Madison, WI</p>
Davis	Connie	<p>I am disappointed in the way the Wolf hunt happened earlier this year. Without input from most citizens from this state and rushed by a privileged group of trophy hunters. They killed wolves at a time when they were raising pups. And many wolves were killed beyond the quota. It is said that a third of the wolves were killed in that hunt. This has become a national tragedy and who ever is responsible for that hunt in the DNR should immediately be fired by the citizens of this state. The Nation is enraged by what happened here in Wisconsin. There should be no hunt in the rest of this year. Aldo Leopold would be saddened. Connie Davis N9506 Old 22 rd Pardeeville WI 53954 608 429 4412</p>
PLC	n/a	<p>I want to register my absolute opposition to a second wolf kill in the State of Wisconsin proposed for November 2021.</p>
Miller	Kristina	<p>Stop hunting wolves. Very unnecessary. They are essential. Stop the murder. Stop the greed.</p>
Tallard	Jeff	<p>I am opposed to the wolf kill. Jeff Tallard Verona Wisconsin</p>
Davison	Shannon	<p>Hello,</p> <p>We are writing this email in support of protecting wolves and NOT repeating the disastrous over hunt that occurred last year. Night hunts? Dogs? Really?? Who OK'd this inhumane way to hunt wolves?? Think this through, do your job and get this right so we have healthy packs who are incredibly important to Wisconsin's Eco-system. Thank you, Scott and Shannon Davison James and Tracy Szabo</p>
Hellmuth	Lynn	<p>PLEASE. Why are you allowing your hunters to kill so many animals??? They are not eating them. You should all be racked with guilt for eliminating these valuable members of our ecosystem. Shame on you all!</p>
Morton	Debora	<p>Wolves are in the public trust. Not to be disposed of like a commodity. Please preserve this animal. It is important to the balance of Wisconsin wildlife. Debora Morton 5200 County Road Z Spring Green Wisconsin 53588</p>
Holzman	Cathy	<p>Wolves are necessary for the health of the environment. Extinction is a horror</p>
Shabbott	Mary	<p>I strongly OPPOSE another wolf slaughter in Wisconsin. These wolves are being targeted for extinction by wolf haters, politicians and trophy hunters. They will not survive another hunt, snares, dogs. Mary Shabbott</p>
Campenni	Tori	<p>Wolves are not only a beautiful indigenous species of animal, they are very important for keeping the eco system balanced and healthy. They're natural predators that help keep many other species healthy. When people hunt they look for big, healthy deer or other animals for a trophy. When wolves hunt they are just looking for food, and an easy catch. Old and ill are usually the easiest.</p>
Vieau	Vicki	<p>I am strongly against wolf hunts. These animals are part of Wisconsin's history and heritage. Wolves are a part of keeping deer, rabbit, etc. populations balanced and at manageable levels. All animals native to this area are part of our food chain and are a useful and necessary part of our natural resources. Sincerely, Vicki Vieau Genoa City, WI</p>
Zumwalde	Donna	<p>Wolf hunting in Wisconsin is unacceptable. There should be a zero quota for this Fall. The last wolf hunt was shameful and a disgrace for the state. The wolf hunters of WI have proved to be irresponsible. Stop the hunt!!!</p>
Hebert-Immel	Coreen	<p>Unacceptable to have any wolves killed this year because of the number of wolves killed earlier this year. It was wrong! You cannot allow this to happen again. No wolves should be hunted the remaining of 2021.</p>

Icke	Tara	In this day and age where people are destroying the planet at an alarming rate please do your part and protect the wolf. I've never written before but this is one issue that really bothers me. Why does man have to destroy living things? For the farmers who say wolves kill their lambs,, can't you make them aware of the sheep guarding dogs, they do an incredible job in many states including Colorado. These dogs are the AKBASH,,ANATOLIAN SHEPHERD, the KANGLE AND KUVASS. These are huge dogs bred solely for this purpose. sure would be nice if farmers and ranchers were aware of their dog options rather than guns. Thank you for reading this, please make Wisconsin an example of conservative measures. Tara icke Mcfarland wi
Douglas	Lisa	Hunting wolves, according to wildlife biologist Cristina Eisenberg, "disrupt[s] their society and destabilize[s] their packs. Packs may split into smaller packs made up of younger animals, with a greater influx of unrelated individuals. And younger, less-complex packs may kill cattle or approach humans for food." Mar 24, 2021 No wolf hunt should occur until the DNR is able to update the State Management Plan through an inclusive, equitable, fair, and science-based planning process that includes: •A review of most current science, including information about the extinction crisis and social science with updated public polling •Full consultation of the Tribes •A public input process •Broad consultation of stakeholder groups
Fitzpatrick	Patty	I am writing in opposition to holding a wolf hunt again in 2021. Our current Wolf Management Plan states we are suppose to have one hunt per year and you already had a hunt in February. Until we fully understand what the results of this hunt are on the females and what it has done to the wolf packs we need to hold off on another hunt. It is no secret in this State that Dr. Fredrick Prehn is refusing to step down from NRB even though his term has expired. It is my belief as well as many others that he is staying on this board until the wolf hunt is set. The decisions made will affect wolves and packs for years to come and needs to be done using science not politics. Thank you for your attention. Patty Maringer Fitzpatrick 608-406-5010
Roxanne	Davis	I am opposed to any wolf killing, and since quota went way over last time, why not just eliminate it altogether? All of the hound use, the baiting, frankly, all of it disgusts me. These social animals are not hunted for meat, it is not acceptable for any reason, ever, to allow killing of wolves, no matter what, or any other trophy sport killing.
Kohl	Andy	Please think a little bit about the harm you have already done to the wolf population and please stop listening to the sad stories of the hunters not being able to kill enough wolves. The last hunt had a huge negative impact on the wolf population and I'm not that educated about the scenario. Leave the wolfs alone for a year to recover. Then review the population next year. What's so impossible about that. Sincerely, Andy Kohl
Mallmann	Sandy	Wolves should be protected not killed. They are top of the food chain which naturally keeps things in order. The hunt last year was appalling, to say the least, way, way over the limit and you let it go!!!! Shameful. I will never understand why humans think they need to control nature!!! Please reconsider your thoughts.
Meuer	Rita	They have families, and remember....you're only as good as you treat an animal.
Wilhorn	Jennifer	I saw this post from a friend and it states how I feel about this so much more eloquently than anything I could have written. Our Hunting Tradition comes with responsibility. We cannot cross the line into pure animal abuse. Ethics and sportsmanship for the Wisconsin Hunter all went out the window in Feb. There used to be a hunters code of ethics, a promise of fair chase and a standard to respect the animals we hunt. Out-right cruelty to both wildlife and hunting dogs has no place in The Wisconsin Hunting Community. Bear hounding is brutal, coyote hounding is brutal and now they cranked that brutality up a notch by pitting paks of hounds against the wolf. It is an affront to our great State of Wisconsin; it is the back door to legal animal fighting. It should have brought shame, not silence from the Wisconsin Hunting Community. Please stop the hounding. Hounding is not hunting. It results in terrorizing of the animals, sometimes running them to death or cornering them in vicious fights that are nothing more than legalized dog fighting. No other state with wolves allows this form of hunting. Stopping this type of hunting will also eliminate the need to pay for these "hunting" dogs that are killed in known wolf territories. Thank you for your time, Jennifer Wilhorn
Jerschefske	Jim	Please record that I am against the killing of wolves in Wisconsin. James Jerschefske 10902 W. Grange Avenue Hales Corners, WI (414) 573-4059
Aasen	Lynn	You have the ability to end these inhuman hunts, included are Night Hunts, using dogs, they are also injured. Encourage hunters to find something else to do. The Eco system depends on it.
Hambrecht	Allen	We must protect wolves and stop hunting them. We finally have made some progress in returning wolves to Wisconsin, we must not continue to kill them. The last hunt was a disaster for the wolf packs. Please protect wolves and do not allow hunting of them. Sincerely, Allen and Carol Hambrecht
Fricke	Joy	Time to stop the wolf killing! It took too many years to get their numbers up, only to have them killed off again? Where's the sense in that?? Sincerely Joy Fricke 6172 S 36th St Greenfield, WI53221
Gluesing	Conrad	The quota for hunting wolves in wisconsin must be enforced, hurting the permanent population of the wolves is inhumane, as well as the practice of using dogs in the hunt. Please listen to the people and make the wolf hunts more humane, the abuse of the population is unnecessary
Kearney	James	No one ever has a good reason to kill a wolf. Every reason presented fails when compared to fact. Wolves enhance our wilderness and should be treasured. Jim Kearney
Sahagian-Allsopp	Ed	End the wolf hunt. ED SAHAGIAN-ALLSOPP
Mandelman	Michael	Please stop Wolf Hunting, the wolves are part of our natural ecosystem.
Muerger	Michael	Hunting practices that will have negative impacts on the long-term health of the wolf population must be prohibited. The precautionary principle must be exercised when setting a quota to prevent more harm to the wolf population. Critical data is missing on pack disruption, pup survival, number of illegal kills and number of wolves killed but not recovered. A quota must take into account the impact of the breeding season hunt on the wolf population. Hunting of wolves using dogs must be prohibited. Wisconsin is currently the only state that allows the use of dogs to hunt wolves. Night hunting of wolves must be prohibited. Stable wolf packs must be protected. Blanket and disorganized hunting of stable and established wolf packs can create disruptions that lead to increased conflicts with people and livestock. Thank you for considering my comments. Michelle Buerger
Schwartz	Becky	please help protect wolves. thanks.

Palecek	Bridget	<p>Dear Wolf Harvest Committee,</p> <p>There are a couple of points I'd like to make regarding wolves in Wisconsin.</p> <p>Having wolves in Wisconsin is a good thing and that's why they were brought back to Wisconsin. The last wolf hunt destroyed wolf pack families that have taken years to build up. I don't understand the theory of people who accepted wolves to be reintroduced to Wisconsin and are now unwilling to accept the down side of having them here. If wolves are to live here we need to know their natural instincts come with the package.</p> <p>It's looking more like they were brought back to Wisconsin so hunters would have another target to hunt for their recreation and I realize that their license fees support the DNR so therefore you might be biased to please the comments of hunters over listening to the the Wisconsin citizens who have accepted that they now live here and are thriving. I'd be curious to know why they were reintroduced to begin with.</p> <p>I know you want to appease the hunters in Wisconsin, but the majority of people are accepting of them now that they are living here. You may have to pay for downed farm animals here and there, but that is the nature of the wolf and you knew that from day one.</p> <p>Sincerely, Bridget Palecek 1665 Clairville Road Oshkosh, WI 54904</p>
Hand	David	<p>We don't need another wolf hunt fiasco like we just had. It was an embarrassment to the state and made WI look like a bunch of out of control hicks to the civilized world. Deer hunting is still excellent and livestock predations low.</p> <p>What we need is some education to certain areas in the state. You should start with debunking the "wolves were secretly released here" conspiracy theory.</p> <p>David Hand</p>
Diment	Kim	<p>As a person with a MSU degree in Zoology, Wolf managing must be based on science and research and not hunters right groups. The most repugnant part of the current wolf hunt would be the use of hounds. This procedure is extremely cruel and unfair to the wolves being pursued. It gives a deadly advantage to the hunter and is one of the reasons the Wisconsin wolf hunt took 20 percent of its wolves last February. That being said, from personal experience it's unfair for people who live in a rural area who have these baying loud dogs running over their private land in the middle of the night. I have had this happen to me on numerous occasions on my property in the Upper Peninsula of Michigan with bear hunters and I hate it (as do many other residents). I would also expect the DNR to work better with Indigenous peoples rights in regards to wolf management and I would expect compensation to be given to wolf caused livestock loss or pet loss but not hunters using dogs. They chose to unfairly subject their dogs to this danger.</p>
Zales	Nick	<p>As a lawyer, I know the Wisconsin public trust doctrine means the state must act as trustee of our natural resources, including wolves, and manage them for the trust beneficiaries, the people. That means all the people wherever they live in Wisconsin. I have just as much right to the proper management of wolves here in Milwaukee as someone who lives in Rhinelander. Your obligation is to ensure my rights are protected.</p> <p>The February hunt was an abomination. It was a waste of our natural resources. The quota was blown out of the water by almost 100%. In good conscience, I do not see how the DNR can allow for a quota of more than 25 for the fall hunt. No one knows the extent of the damage done by the February hunt. It would be irresponsible to allow another slaughter and the destruction of the resources that belong to all the people simply to satisfy hunters. All of the people of Wisconsin own these resources. They should be managed for all and that means not having another wolf slaughter.</p>
Ericson	Mary Anne	<p>The wolves that were slaughtered earlier this year in Wisconsin and those you're planning to kill later this year are mothers and fathers, brothers and sisters, and youngsters who are just learning the ways of wolves. Wolves live in bonded family units just as humans do, and they depend on one another for survival and well being just like us. How is it okay to tear families apart, including orphaning the young, by randomly killing their members? What could ever justify inflicting such needless suffering?</p> <p>I have never had the good fortune to see a wolf in the wild but it's important to me that they are out there, and the loss of them grieves me deeply. I'm still beset with disturbing images from Wisconsin's last wolf hunt, which was reported in newspapers in my West Coast city. Does it matter to you that many of us are profoundly and personally affected by what happens to our wildlife? I do classroom programs about wolves and wildlife and it's a great loss to our young people, especially, if they never get to experience truly wild nature because a small minority of people get their kicks from killing off our iconic native species.</p>
Riemer	Julie	<p>I am a Wisconsin hunter and I am embarrassed and disgusted at what took place in my state last week with a rushed and ill-considered wolf hunt.</p> <p>The Milwaukee Journal Sentinel's outdoor writer, Paul Smith, has written an excellent account of the history that got us to this point. But "this point" is carnage that exceeded the Department of Natural Resources' harvest goals by an astounding 82 percent.</p> <p>Don't blame the DNR's wildlife professionals for that. They wanted to delay the hunt until November to give them adequate time to set proper limits, consult with Native American tribes, and administer the program correctly. But they were overruled by the courts, legislators and their own bosses on the Natural Resources Board.</p> <p>"Never before had the DNR put together an application period and drawing for a hunt in such a short period of time," Smith writes. "It compromised the agency's legal requirement to consult with Native American tribes.</p> <p>"And never before had the state held a hunting and trapping season during the wolves' breeding season."</p> <p>To make matters worse, almost 90 percent of those wolves were hunted with dogs. Most ethical hunters would consider that to be out of bounds, unless you were trying to track down wolves that had been known to kill domestic animals. And to those who would say that it is very hard to find wolves without dogs, I'd say: Yes. It's hard. That's what makes it hunting instead of a video game.</p> <p>A quick summary of the lengthy story recounted by Smith goes like this. On Jan. 4, Trump's U.S. Fish and Wildlife Service delisted the gray wolf as endangered. Wisconsin law requires that, when these federal protections come off, the DNR must schedule a hunt between the beginning of November and the end of February. (This is a bad law. DNR scientists and wildlife managers should make this decision, not legislators.)</p> <p>DNR staff told agency policy makers that that did not give them enough time to put together a hunt by February. They recommended waiting for November. The board went along, but then a Kansas-based extremist group called Hunter Nation (Ted Nugent is on its board; enough said) sued and Wisconsin courts agreed that the DNR had no authority to delay the hunt. The result is this awful mess: a harvest quota grossly exceeded, tribal relations damaged, and the general non-hunting public appalled.</p> <p>According to the DNR, wolves took only 152 domestic animals last year and their owners were well compensated by the public with payments totaling \$1.8 million. And many of those animals were dogs used to hunt bear, another unethical hunting practice. Finally, Wisconsin law already allows anyone to shoot a wolf at any time if the wolf is threatening a domestic animal.</p> <p>On the other hand, the wolf population now stands at over 1,000 and, even with the exceeded quotas, the department isn't worried that the population will crash. But obviously we can't exceed harvest quotas by this much every year.</p> <p>But let's be honest: There was no biological or social imperative for a hunt. It only happened because some hunters just wanted to kill wolves.</p> <p>Extremist groups like Hunter Nation should understand that they may have unwittingly helped end wolf hunts for a good long time into the future. This kind of thing will, no doubt, be used to push the Biden administration to relist the gray wolf, thereby automatically ending Wisconsin's wolf hunt. Under the circumstances, I'd be for that.</p> <p>If you accept the idea that hunting is okay (as about 70 percent of Americans do), then responsible policy makers should regulate it in a way that is sustainable for the species, is consistent with the ethical tradition of "fair chase," and also respects the prevailing cultural values of the public at large.</p> <p>The rushed wolf hunt travesty of last week honored none of those goals.</p> <p>Julie J. Riemer Osceola, WI</p>
Gardner	Monica	<p>RE: Advisory Committee meeting on the Fall 2021 Wolf Hunt</p> <p>Dear Members of the Committee,</p> <p>I write today to urge the Committee to set the quota for a fall 2021 hunt at ZERO. I believe the DNR should be about protecting Wisconsin natural resources for ALL citizens, not facilitating hunters. The last hunt was a monumental and tragic disaster. The wolves were not the only ones who paid the price! Our whole state suffered the consequences and this committee should still be feeling the sting of that shame. The grossly negligent over-kill in the last hunt could affect the next several generations of wolves. But here we are, less than half a year later, talking about another quota in the fall...when what you should be doing is analyzing what went awry the last time, fixing it and figuring out how long it will take the population to recover from it. The only acceptable number is ZERO.</p> <p>~Monica Gardner N2657 Hartman Creek Rd Waupaca, Wisconsin</p>
Good	Amy	<p>Hello,</p> <p>As you discuss the quotas for the fall wolf hunt, this Wisconsin citizen would like to say please don't conduct the hunt at all. Please, have the quota=zero. This spring's hunt was an embarrassment to our state. This is not what the majority of residents want.</p>

Hollis	John	<p>I feel that there should be a zero quota for the wolf season.</p> <p>The abuses that occurred in February 2021 led to the quota being exceeded by 99 wolves. Illegal kills are probably very high, considering the way the February hunt went. It is most likely a low estimate that at least 20% of our wolf population was killed in just 3 days, many believe it was closer to 30%. The overkill number from February needs to be subtracted from this fall wolf season quota.</p> <p>The February 2021 hunt took place during breeding season. Pregnant alpha females and alpha males were killed. Many packs will not reproduce this year. The biological damage done to the wolf packs may go long past this year. A reliable wolf population number will be difficult to determine now. The population of the wolves prior to the February 2021 hunt was never determined, due to the winter wolf population census not being completed. Plus, the carcasses were not collected for reliable data.</p> <p>The tribes rights were trampled in the February hunt. The hunters decided that they were entitled to take the tribes 81 wolves. Correcting this wrong should also be another major consideration this fall season. The public trust doctrine says that wildlife belongs to all Wisconsin citizens and that fact was violated in the February 2021 hunt.</p> <p>My wife and I moved up north in 2018 because we enjoy viewing wildlife. One item on the bucket list was to see a wolf. Our neighbors told us of a couple occasions that they had seen a wolf. After a fresh dusting of snow, on the morning of February 18, 2021, at the very end of our driveway were the prints of three wolves. But February 22, 2021 brought 3 days of non stop killing of our Wisconsin wolves. Now we wonder if we will ever be able to see a wolf.</p> <p>Maintaining the wolves that we do have left should be the goal, so that future generations, like my grandchildren are able to enjoy them.</p> <p>John Hollis Winter, WI</p>
Hawkes	Lisa	<p>Why bother setting quotas if this kind of shameful disregard for limits is allowed to continue unabated:</p> <p>"In Wisconsin, a 2012 state law requires an annual wolf hunt when the animals are not under federal protection. State wildlife officials had begun planning for a hunt next November, but were forced by a lawsuit from an out-of-state hunting group to hold one before the end of February. That hunt lasted only three days before state officials shut it down: Licensed hunters killed 216 wolves in that time, more than 80 percent over the allowed quota of 119, and nearly 20 percent of the state's estimated 1,000-plus wolves."</p> <p>Shame on Wisconsin Environmental Policy Decision Makers! Because of this barbaric killing spree last Spring all wolf hunting, except problem animals, should be banned for at least a full year.</p> <p>Sent from Lisa Hawkes</p>
Newman	J	<p>Anything you give to the wolf population will come from managed game populations such as moose, elk and deer. If you remove man from the equation, wolves will end hunting as we know it. Any portion of the game population that you allocate to wolves will reduce big game populations and ultimately reduce hunting license revenue. Without this revenue there will be no game management or enforcement or protections for wolves.</p> <p>You game management people need to understand: There is no free lunch!</p>
Buesing	Angela	<p>To Whom it May Concern,</p> <p>If you must hold a hunt this Fall, I am requesting that you set a quota of 6 wolves, one per zone.</p> <p>Thank you, Angela Buesing</p>
Warren	Nancy	<p>My neighbor, a Michigan resident, was a DNR volunteer summer tracker for 25 seasons. I also served as a regional coordinator for much of that time and assisted with howling surveys in northern Wisconsin. I quit the program when a photo of a dead wolf appeared on the front page of the Ironwood Daily Globe with a grinning hunter. From the description provided, I knew the dead wolf was the dominant male from one of the packs I tracked. I knew his territory; I knew the location of the pack's rendezvous site and denning area. I knew his deep baritone howl and now he was dead, a trophy on someone's wall.</p> <p>These wolves were never involved in a conflict, never interacted with people. They simply left scat and tracks and let their location be known by their howls – he was killed for being a wolf. I returned to the area and heard wolves howling for their missing packmate. It is an eerie sound. They called from different directions hoping for a response but heard none. I sat and cried mourning with them.</p> <p>My experience was not unique. Researchers have documented wolves howling, scent marking searching for their missing pack member.</p> <p>What happened in February was not a wolf hunt; it was a wolf slaughter and a violation of the public trust doctrine. There was much that could have been done within the confines of Act 169 and the lawsuit and I am not optimistic anything will change in the future.</p> <p>Wolves do not honor state boundaries. I have monitored Wisconsin wolves that dispersed into Michigan and monitored Michigan wolves that dispersed into Wisconsin.</p> <p>Decisions should be made utilizing the best available science and principles of democracy both of which were lacking during the February hunt.</p> <p>The hunting/trapping of wolves is not necessary. Conflicts are low, wolves provide ecological and economic benefits and wolf populations self-regulate.</p> <p>I ask that you:</p> <p>Remove any population cap. Wolves should be allowed to reach their natural carrying capacity. The often quoted 350 number was not scientifically based – it was merely a compromise between those who wanted more wolves and those who wanted less. It was never intended to be a cap, rather the point at which more aggressive control actions could be implemented.</p> <p>Act 169 must be repealed or at a minimum revised:</p> <ul style="list-style-type: none"> • DNR must work with legislators to remove the mandate for a wolf hunt. The hunting of any species must be scientifically based and not a result of legislation. • DNR must work with legislators to remove the use of dogs during a wolf hunt. • DNR must work with legislators to remove compensation for hounds or at a minimum modify compensation limiting payment to the first dogs killed in an area where there had not been a previous predation. Any dogs killed by wolves after 48 hours of posting a predation and any dogs killed within a 5 mile radius of a past predation within the prior 4-5 years shall not be compensated. • DNR must work with legislators to modify the 24 hour mandatory zone closure. It is abundantly clear that those who want to kill wolves wait to report their trophy in order to exceed the quota. However, until legislation can be changed, DNR can provide the 24 hour notice but close the zones when ½ the quota has been met. <p>Until legislation can be changed:</p> <ul style="list-style-type: none"> • For any zone that is exceeded, DNR should apply the excess killed to the closest zone still open. For example, if the quota in Zone 1 is exceeded by 2 wolves, then the quota for Zone 2 (or any other open Zone) shall be reduced by 2. This will insure or at least minimize exceeding the overall quota. • Establish protected areas where wolves will not be hunted, trapped or chased by dogs. This includes training season for dogs. Our national forests / refuges belong to all of us. This is also prime wolf territory where there should be zero quota. Restrict any hunting/trapping to areas within a 5 mile radius of where conflicts are likely to occur. • Establish a buffer zone around reservation lands where no wolf hunting/trapping is permitted. • DNR must prohibit night hunting of wolves
Anderson	Mary	<p>After decimating half of WI wolf population a fall hunt would be absurd. We have no knowledge of how many survived the February massacre. The February hunt was atrocious as it stands. I sincerely cannot believe your people do not see and understand what these people do to these animals. The hatred towards wolves is the same hatred that racists carry around. It's unreasonable and no way to make policy. MY wolves should not be politicized, yet here we are using wolves as a political tool to garner money and "points". I'm in the woods everyday. Very little, if any wolf sign in their usual stomping grounds.</p> <p>Hounds are not family dogs, they are a disposable tool, not worth the \$2500 stipend for sure. Most are not pedigreed and can be purchased for very little money. I see how they are taken care of in Northern WI. They are not made for these sub zero temperatures. By proxy you promote domestic and wildlife abuse by allowing unleashed dogs in the forest.</p> <p>A few dead cattle or dogs does NOT warrant an all out war on wildlife. The hounds do enough of that for everyone.</p> <p>Don't any of you believe in the modern science of apex predators? Do any of you actually know anything about wolves?</p>

Gilson	Stacy	<p>Dear DNR Committee,</p> <p>I do not believe after the horrific slaughter that was allowed in February, 2021 Wisconsin can justify holding another hunt. The methods that the DNR allowed were the most outrageous violations done to an animal who has done nothing to deserve this kind of treatment. It was no hunt. I support some sort of wolf management, but simply slaughtering a species to bring its number down to a number pulled from years ago and no scientific reason or data as to why that number is correct is not acceptable. No other animal is being managed in a way that says how many of them are tolerated. In 1925 the US had about 300,000 white tail deer, now there are approximately 35-40 million roaming the forests, the roadsides and any where they can find food. Deer cause 1.2 billion in damages and 200 deaths annually. Wisconsin has an estimated population of 1.2-1.8 million from the 2019 count DNR page. We have allowed a population of deer and domestic livestock to multiply to a number that is hurting the environment and plays a part in adding to climate change from the over grazing of grasses across America. Climate change needs to be addressed, we cannot wait any longer. Wolves play a very important role in returning the forests back to a more natural state. Wolves keep the herds moving, kill the sick and diseased animals which helps sustain a more healthier herd. This is nature's way of keeping the wilderness healthy and with a balanced ecosystem so many other species of plants and animals can thrive too</p> <p>These wolves belong to all of us, this is a matter of the public trust doctrine. Politicians are suppose to uphold an oath to preserve the wilderness and the wildlife who live there for present and future generations. No one, or one branch of an organization should hold the power to dictate what species is or is not tolerable. There needs to be a collection of resources and proven data before such decisions are implemented. This committee or any other scientific community has no public data showing what affects this last hunt has done to the Wisconsin wolf population, the reproduction, or the impact it caused on the packs as a whole. The forests are quiet indicating many more have been taken then reported. We know killing alpha members in a pack causes the pack to disperse and because the family structure is broken, animals will prey on easy targets and do other behaviors not natural. The pack is structured to have alpha and elders teach the pack its role within the family. Humans should not interfere with this natural process. There needs to be broader picture of what balance is given to one species over another, the impact as a whole and what happens when we humans alter those balances.</p> <p>The hound hunters may believe their sport is a given right but many experts, conservationists and animal lovers all over the world feel differently. Given the lack of regulations enforced on the blood sport and the lack of transparency on what these dogs are doing to wildlife and the safety of pets and people encountering them I feel your organization needs to post public records on how many dogs are roaming the woods and where.(Including out of states) How many deaths and injuries (not just wolf encounters) are these dogs causing or dying from. People are no longer safe camping, hiking or simply walking. I see the regulations on the DNR page but there is no public records that show how many dogs are injured or killed by other wild life or how many wild life are injured or killed. Fines or violations given to hounders when laws are broken and who is policing them. These dogs don't even need to have rabies shots???? 6 dogs per permit to a person 10 years old or older?? what 10 year old or one person can control 6 loose dogs attacking something? So if 4 people are in a party and each has up to 6 dogs, how is that fair chase? What happens if they attack your pet, person or you see it killing a fawn or some other wild life? Who is held accountable? Most other states have banned this horrific sport. Wisconsin has become the leader in implementing this cruelty back into practice across states who had banned it.</p> <p>There are many ways Wisconsin could be raising money other than killing animals that would support budgets. Implement usage fees of resources people choose to do instead of hunting.</p> <p>Do some brain storming of activities or some fund raising activities that involve hunters and non hunting people. Educating young ones in the importance of respecting nature and not destroying our resources for laughs. We need to have a committee who is transparent, provides proven evidence of why they make decisions and represents both the hunting community and the non hunters.</p> <p>I DO NOT SUPPORT ANY WOLF HUNT THIS NOVEMBER 6TH, 2021. ZERO QUOTA.</p> <p>Sincerely, Stacy A Gilson 3807 Michael Drive Weston WI 54476 sgilson1960@charter.net</p>
Theisen	Kimberly	<p>To Whom it may concern,</p> <p>I am very much against the hunting of wolves. This is my personal opinion based in my own life experience and sensitivities.</p> <p>For this reason, I would like to see wolf hunting seasons ended this year.</p> <p>However, at the very least, the hunt number set by the DNR should be based in science, guided by humane practices which live up to a moral code not to kill needlessly and finally follow the rules set out by the DNR without allowing a small minority to seize the process and dictate outcomes.</p> <p>For these reasons I am requesting the WDNR immediately start following the Public Trust Doctrine and cease all activities which violate it. The quotas must include public input and the collection of scientific data which makes the hunt a useful land management tool and not an immoral slaughter.</p> <p>We can study wolf populations and understand them. Live with them. This is the work of a sane and humane society. One I will be proud to be a part of.</p> <p>There may be a few in Wisconsin who do not care to know the wolf, only to hunt the wolf. I say those those voices are a very small minority and must not be given free reign, but understood to be a small special interest group. The majority of Wisconsinites are not hunters and support the wolves.</p> <p>With all sincerity, Kimberly A Theisen 2543 N Dousman st Milwaukee, WI 53212</p>
Ash	Cheryl	<p>As a voter and a concerned citizen, I am asking you to help the voiceless...this is so inhumane and I asking you to quite caving into special interests and the so called trophy hunting...realize the long term impart you are creating by stepping aside and not doing anything!!!!!! The balance of nature is so important and for some reason you, our federal agency is ignoring this....WHY, WHY, WHY..the most inhumane thing we do to mankind and wildlife and environment is INDIFFERENCE!!! So care and don't let the CRUEL, TOXIC PEOPLE WIN!!!!!! CARE, CARE</p>
Osterlie	Lynne	<p>Hello I am writing to express my concern and opposition for the Wolf hunt planned for the fall 2021. The last wolf killing desecrated our current wolf population undoing the decades of work to restore the benefits of this important animal due to the gross mismanagement by "our" DNR. This hunt MUST BE CANCELED.</p> <p>Please listen to citizens like myself and the science in support of the positive impact they contribute to our existence and environment. End this cruel and misguided practice.</p>
Arnold	Joan	<p>To WIDNR: Comments concerning Wisconsin Wolf Hunt</p> <p>Wisconsin's wolves should be protected from disruption and elimination. The health of this species is critical for the overall biodiversity of the ecosystem. To have a hunt because some, a few, humans just want to kill them is insane. Can't we learn from our previous mistakes and take care of our animals that God helped put on this earth? The DNR needs to manage these animals a lot better than you did this past year's hunt. What an embarrassment! Although I disagree with hunting of wolves completely, I will make the following comments as lawmakers have made it legal to kill wolves.</p> <p>It is against logic that hunting with dogs is allowed. Wouldn't this only make dogs an enemy of the wolf and when wolves encounter dogs of any sort that they now are going to protect themselves and try to eliminate the danger? We should not have an ancestor of this animal trying to kill it now. It is a waste of my tax paying money to provide ANY compensation for hunting dog losses due to loss by wolves or for that matter bears. Dogs should not be allowed for hunting.</p> <p>Night hunting should not be allowed either. A break in the killing needs to be made in order to see how many were killed during the day and allow the DNR to stop the killing when enough have been killed per your "quota." I guess for safety reasons it may be better not to allow night hunting either.</p> <p>Studies need to be conducted to see what the effects are for pack interactions after the killing spree has occurred to see if the health of the pack is harmed. What does this do to the overall survival of this species? Do these killing sprees have a detrimental effect on the overall population and disrupt pack interactions? Do these wolf kills have a detrimental affect on human interaction and make them more prone to go after easier kills such as farm animals and dogs?</p> <p>The State needs to consult with Tribal Governments during this process of formulating any hunt (kill). Most of these kills occur on ceded territory.</p> <p>Snowmobiles or other motorized type vehicle should not be allowed for chasing and thus hunting any animal, including the wolf. How humane is this?</p> <p>Traps are never humane and should not be allowed in killing of wolves.</p> <p>Wolves are a part of a healthy ecosystem and a healthy wolf pack can be a benefit for our State. I would rather see a live wolf instead of a dead one.</p> <p>Thank you for taking my comments.</p> <p>Joan Arnold 285 County Road PP Rudolph, WI 54475 715-435-3518</p>

Lehmann	M	<p>Good morning.</p> <p>I know the wolf hunt is a heated subject.</p> <p>As a lifelong hunter in Wisconsin, conservation is at the heart of all I do.</p> <p>The hunt needs to continue. I spend more time in the woods than most people. I hunt deer & small game. I shed hunt & mushroom hunt. I spend countless hours cutting wood and just hiking the woods.</p> <p>I have seen the increase in wolf sign over the last couple years and the ecosystem is changing.</p> <p>I do not have a personal interest in hunting the wolves, but I do believe they need to be hunted to keep their numbers in check.</p> <p>When they were reintroduced the deal was to keep their population in check. It has grown faster than anyone believed it would. With how quickly the quota was hit last year I believe the pack to be undercounted.</p> <p>Please continue the hunt.</p> <p>Thank you!</p>
LeMieux	Richard	<p>Please do everything in your power to stop the insane slaughter of Wisconsin wolves. The last hunting season was atrocious. It is time to discontinue the Wisconsin hunt, at least for 1 to two years, to enable the Wisconsin wolf population to recover. When someone from Kansas can overrule the people of Wisconsin, some thing is totally wrong.</p>
Anderson	Vicki	<p>The Wolf kill must be zero.</p> <p>One day there will be consequences for the mis management of our wolf population.</p> <p>Vicki Anderson</p>
Garrett	Robert	<p>Dear Sir and Madame</p> <p>I am a long time sportsman, hunter and fisherman in WI.</p> <p>Things have changed in our conservation and wildlife landscape over the decades.</p> <p>The reintroduction and maintenance of a sustainable wolf population being a most recent and challenged process.</p> <p>Not being a scientist but believer in those who have chose this as a profession- I voice my support to them and their recommendations.</p> <p>Studies galore and legislative initiatives- please consider managing to the previous defined quotas. As we all know, our landscape and forests are not growing and are needed to support many of our wildlife to continue to live a natural life.</p> <p>Please vote to work to manage to previous quota and 'account for and maintain' as needed in the future.</p> <p>Robert Garrett Wausau WI</p>
Hiller Depe	Linda	<p>Randy Johnson Wolf Harvest Committee, About Social Carrying Capacity —</p> <p>It turns out there is NOT a social carrying capacity for killing wolves in Wisconsin. 68% of Wisconsin citizens do not approve of the way the 2021 spring hunt was carried out and to not want any more wolves killed this fall. That is ZERO quota. In an election, 68% would be considered a landslide victory.</p> <p>Wisconsin was written up in every major publication in the US as the poster child for why wolves need to go back on the ESL. It was a massacre carried out by the worst of the worst, giving the DNR, Wisconsin, and by association, all hunters a bad name.</p> <p>Decent, law abiding residents of this state are being dismissed for a small minority of poachers and destroyers of our valued resources. Hunter Nation and the likes of Dentist Prehn are deciding Wisconsin's wildlife policy. The absurdity is stunning.</p> <p>Someone I met who had moved here from another state said to me, regarding the wolf policy, "I had no idea Wisconsin was this backward."</p> <p>So there you have it. Where is the pride in our state for being environmentally progressive and caring for our wildlife? It is virtually nonexistent for me and many others. Our sense of well being and trust in public officials is eroded beyond repair at this point.</p> <p>Zero quota is the only answer for the fall.</p> <p>Linda Hiller Deppe 326 Lake St. Pewaukee, WI 53072</p>
Kleczewski	Tiffiney	<p>I will keep this simple and to the point.</p> <ul style="list-style-type: none"> - I believe wolves should be in WI but they need to be managed. - The population goal according to the management plan is 350+ - The 2020 population count estimates 1034 to 1500 animals in WI - Hunting is obviously needed to reduce the population to the management goal; other methods listed in the mgmt plan will not be able to effectively reduce the population since it is so far over the target. - I believe the harvest quota for the 2021/22 hunt should be set higher than it was for the Feb 2021 hunt. The number of wolves harvested in 2012/2013 were 250 each season and the population held steady then dropped a bit in 2014. The current population can definitely handle a reduction of 200+ animals and it will have minimal impact. The quota needs to be set higher to see population reduction to get it inline with the management goals. - The density and territory of wolves is too high and far above the management plan goals. Active management needs to include public harvest with a higher quota. <p>Thank you</p>
Purinton	Hoyt	<p>To Whom It May Concern:</p> <p>I support the continuation of fall wolf hunts to manage statewide wolf numbers in keeping with population goal numbers established at or around the time of wolf reintroduction to this state some time ago.</p> <p>The last wolf season's relatively short time needed to reach harvest goals certainly indicate a population greater than estimated in establishing harvest quotas.</p> <p>I support increasing wolf harvest quota for fall 2021 in light of this past season's brevity in reaching harvest goal and the previously too-low harvest quota based on what appears to be an undercount miscalculation of actual wolf population in this state.</p> <p>Thank you, Hoyt Purinton Washington Island, WI</p>
Berkvam	Kathie	<p>My name is Kathie Berkvam and I live in Beaver Dam.</p> <p>I would like to see the law that allows wolf hunting with dogs repealed. I think it is a cruel practice.</p> <p>I would also like to see the law that reimburses hunters for their dogs killed by wolves also repealed.</p> <p>Wisconsin has reimbursed hunters for dogs killed by wolves since 1985. It's the only state in the country with such a program.</p> <p>Kathie Berkvam 619 West Maple Ave Beaver Dam, WI 53916 920 344-9853</p>
Overby	Gary	<p>Please reevaluate culling wolf. They play a very important part in nature. We need wolves. The slaughter this past year was completely unnecessary. Dogs, baiting, traps, and killing pups by explosives are all in humane.</p>
Stein-Kodzick	Mia	<p>Wolves are vital to our Environment!! Stop allowing them to be killed!! Mia Stein-Kodzick</p>

Spring	Sharon	<p>All wolves deserve to live wild, free natural lives of their own accord. 4.9million domestic dog bites occur each year... What is done about that? Nothing. WOLVES ARE ANIMALS, LIKE HUMANS WITH FEELINGS AND EMOTIONS.</p> <ul style="list-style-type: none"> • I LOVE WOLVES. • ALL WOVES NEED TO BE PROTECTED. • WOLVES DESERVE TO BE LOVED BY HUMANS. • DO YOU KNOW SOMEONE WHO HAS A DOG? • ALL DOGS ARE DESCENDANTS OF WOLVES.... • WHY DO PEOPLE ALLOW DOGS EVERYWHERE... • WOLVES DESERVE TO LIVE ANYWHERE THEY CHOOSE. • HUMANS ARE OVERPOPULATED. NOT WOLVES. <p>WE LOVE WOLVES!</p>
Manthey	Patricia	<p>Please listen to all Wisconsinites when setting hunting seasons. The spring overharvest of wolves should be taken into account and the fall quotas set to mitigate that. There are small groups, even from out of state, that have pushed DNR to poor policies. Please do not give them unwarranted importance.</p>
Parker	Dan	<p>Thank you for hearing and considering my comments today. This is a clear opportunity for sound and established wildlife science to be held above emotion-laced pseudo science. The wolf population in Wisconsin is more than healthy and far above the population goals established long ago. Putting the wolf on a pedestal that is above all other wildlife makes no logical sense whatsoever. Pretending that population levels of 100 years ago are a reasonable metric is simply absurd considering the massive changes on the landscape and the corresponding changes in the carrying capacity of the land. With that in mind I'm asking for you to approve as high a quota for wolf harvest as the population can sustain. It appears to me that even if the the full current and recent past quotas are met, the overall population will have no reduction in the current size of the population merely a reduction in the amount of growth. I also want to say that if Wisconsin is going to be serious about managing the wolf population then there must be a quota adjustment made for the portion of the quota that the tribes refuse to attempt to fill. They are not operating in good faith. If they do not want harvest any wolves that's their right but then we have to make up for that.</p> <p>Thank you Dan Parker Wausaukee, Wisconsin</p>
Kumbier	Zach	<p>I would like to make a few comments for your consideration in regards to the upcoming Fall Wolf Season in Wisconsin. It's not a secret that there are individuals who vehemently opposed to the hunting of any animal, the wolves of Wisconsin are not an exception. While everyone is entitled to their opinion, I appreciate that the Wisconsin DNR is taking time to consider the people who truly do advocate for the conservation of animals and the places they inhabit, the hunters. The individuals with a hunting heritage and background are many in Wisconsin, however in regards to wolves it seems that the hunters are a minority. In current times even science is being disputed and many people are speaking their opinions as if it were science when it is not, again this is occurring with the wolf population in Wisconsin. I encourage that Department of Natural Resources to mirror some of the goals in place by western states with a history of wolves while keeping in mind the values of everyone in the state. I believe there is much more negative hype on the Wisconsin wolf hunts due to proximity to larger cities east compared to those of western states, and the Native American tribes in the state vouch for no hunting of wolves as well.</p> <p>While these facts are proven and known, I feel it's important to keep them in mind when having the difficult discussions that will undoubtedly take place regarding this upcoming wolf season. Money from license sales to hunters and anglers creates the bulk of what is available to spend on the conservation of habitat, and the animals that call that habitat home. Tying in the money raised through the Pittman-Robertson Act, these additional funds come directly from the purchases of individuals that hunt and target shoot, is one of the greatest resources for our natural resources. The Wisconsin DNR has done a fairly exceptional job at making certain the voices of hunters are heard when determining goals/season structure/bag limits and this should remain unchanged with the scheduled wolf season. Much emphasis by those who support the wolf season is placed on depredation costs caused by wolves because of fear of sounding "blood thirsty" or as someone who "kills for pleasure". While depredation of livestock and pets is a true problem, I personally do not put that in the forefront of my concerns. My main concern is that of our current natural resources and the impact wolves have on them.</p> <p>I'm an advocate for the conservation of all animals, being outdoors, and just enjoying nature. Hunting is my passion and closely tied to that is my passion for land and wildlife management. I would consider myself a fairly knowledgeable outdoorsman and while I have seen the natural ebb and flow/peak and valley cycle of animals in various areas of the Midwest, I've never seen such a long lasting "valley" in what was once Wisconsin's best source of economic and conservation income, the white tailed deer. I have witnessed firsthand wolves killing livestock and deer for sport. I have seen multiple large tracts of land, varying from 1 to 7 square miles that once held large densities of deer, be decimated to the point that a conservative estimate would be 10% of the deer population is left in those areas. I am not involved in the science of our natural resources, but I am more educated than your typical "barstool biologist" of which there are many who voice their opinions in this state. Every animal needs it's population kept in check, what better way than through hunters who actually care and give back to the resources we consume through eating and outdoor experiences. Wolves are no different and the negative impact they have played on the deer population and the dollars raised by those who hunt deer will be lasting. I believe with wolves we will never again be seen as the deer "mecca" of the Midwest. I do not advocate for all wolves to be killed but I do advocate for their population to be kept in check through hunting and trapping.</p> <p>While I'm sure the comments received are mainly tailored towards the upcoming scheduled wolf season, I would like to point out the negligence that has occurred by the Wisconsin DNR. The population estimates have been laughable for 20 years and this past spring season proved that to be true. A wolf is a difficult animal to trap and hunt, they are much more wary and elusive than any other animal in this state, yet somehow (if the population estimates were accurate) nearly 20% of the state's population estimate was harvested in only a few days. In 2018 there was an estimated 2 packs consisting of 8 total wolves in southern Bayfield County. That same fall at over 8 different bear bait sites, miles from one another yet all in southern Bayfield County, had a combined 28 wolves on trail cameras within 45 minutes of each other. I have heard this same example from multiple others around the state. It's not hard to see the wolf population in Wisconsin is extremely higher than projected and without a season it will only get worse. What is the means to the end for their overpopulation? Disease and starvation after they've stripped the land of their own food resources which just happen to be a driving factor for getting hunters to spend dollars as well? A continued hunt, with a quota 25% higher than has been in the past, and fewer tags given out, would in my mind meet long term goals not only for the conservation of wolves and their health in the state but also start to make a positive impact on deer populations once again. Also, one last note, tribal rights for wolf tags need to exist but at a much lower level.</p> <p>I do appreciate often thankless job our Department of Natural Resources does in our great State of Wisconsin and appreciate the consideration of my comments.</p>
Johnson	Coleen	<p>To Whom it May Concern:</p> <p>To say that I am disgraced Wisconsinite, by the happenings of the rushed February wolf hunt is an understatement. I have lost total respect for our Department of Natural Resources, our government legislators and for fellow "hunters" that decided that rules, true management practices, and science need not apply. What happened in February was not a management tool, it was an inhumane slaughter of an animal that just came off Endangered status. Harvest numbers that are supposed to be upheld were surpassed without a second thought, unsafe and unfit tactics that were not regularly seen in past hunts of other species were suddenly deemed appropriate, and fully ignored were the actual number of wolves currently in our state and the true long terms effects, biologically and ecologically that this hastily scheduled "harvest" will have. It is time to get the real science, animal numbers and humane regulation to be behind the management of all of our wildlife.</p> <p>I have always followed and upheld the rules set forth when purchasing a harvest license, but feel that I will no longer purchase one as my dollars given are not being allocated for the true purpose intended.</p> <p>Sincerely, Coleen Johnson Winter, WI</p>
Mason	Gina	<p>Hello, My name is Gina Mason and I am a resident of the state of Wisconsin for the last 30 plus years. I strongly oppose the upcoming November Wolf Hunt and highly recommend a zero quota! I am the president of Chasing Daylight Animal Shelter and a board member of the WI Federated Humane Society.</p> <p>Most residents in Wisconsin oppose the trophy hunting and trapping of wolves. This includes hunters, farmers and the general population! The majority of our state believe the February slaughter was extremely excessive and did irreparable damage to the wolf packs. No study has been done to estimate the number of surviving wolves and what has happened to the integrity of the packs.</p> <p>The use of hounds, traps, snowmobiles and ATVs truly made the February hunt a slaughter and nothing more. As an animal advocate I can in no way support this inhumane activity. In fact I believe it should be considered illegal and it is certainly immoral and unethical.</p> <p>I support zero quota in November.</p>

Lee	Hannah	<p>To the WI DNR: It is crucial that you take the following considerations into account when planning for the 2021 wolf season quota. You will do great harm if you do not heed the following: 1. Any practice that negatively impacts the long-term health of the wolf population MUST BE PROHIBITED. Currently, such critical data as pack disruption, pup survival, number of illegal kills, and number of wolves killed but not recovered is missing. You must also take into account the impact of the breeding season hunt on the wolf population; its impact is far greater than hunts at other times. 2. Unsportsmanlike "hunting" methods such as the following must be prohibited. They turn "hunting" into an activity more resembling murder. E.G.: A. The use of dogs MUST be prohibited. (Everyone seems to know this except Wisconsin, as we are the only state that allows the use of dogs!) It is cruel, unnecessary, unfair to the hunted, and unnecessarily disruptive to the environment. B. Night hunting must be prohibited. C. Stable wolf packs must be protected. Disorganized blanket "hunting" of these packs contributes to overkilling and increased conflict with people and even livestock, and would lead to another killing frenzy like this past February's bloody fiasco. I urge you to exercise wisdom, care, and a humane perspective that would include not only the shortsighted goals of hunters, wolf-haters, or even agricultural interests, but an even bigger picture in which ecological balance, fair play to ALL parties, and actual kindness have a role. We are not barbarians who destroy whatever gets in our way, in whatever cruel way we may choose. Do not forget that the word "human" and the word "humane" are almost identical for a reason: A person who disregards the right of the land and its wild inhabitants to be treated respectfully is not a human being. Thank you for your consideration of these crucial reminders.</p>
Westphal	Kevin	<p>Dnr I would like to see a quota of 250 for the fall hunt. I am in Washburn county and my family has had this property since 1950. We have never had a wolf problem till last year. A pack of at least five have moved in to the area and haven't left. Our deer herd has been reduced greatly because of them. They need to be controlled more. I managed my land for deer. I love to deer hunt and have recently retired dreaming of having good hunting. It didn't happen last year. The deer hunt was bleak. The wolves were on the trail camera daily. We need a good harvest please! Thanks! Kevin Westphal W3338 Hwy 63 Springbrook Wisconsin 54875 612-599-4574</p>
Mulvey	Jamison	<p>Greetings, I am a member of a club that owns land and hunts in SW Sawyer County. During the 9-day gun deer season, we keep track of the deer we see, and of those deer, how many are bucks. We have 55 years' worth of this "deer seen" data, which I would be happy to share with anyone who would like to see it. Over the last 15 years, as the predator population has risen (both bear and wolves), the deer population, as reflected in our data, has declined sharply. So sharply, that where we, as a group, used to see 75-100 deer in a day, now only see less than 100 in all 7 days. Some of the lowest deer seen totals are below: •2020, 13 guys in camp this year, 7 days, 47 deer seen all year. •2019, 13 guys, 7 days, 27 deer seen all year. •2016, 16 guys, 7 days, 66 deer seen all year. •2014, 12 guys, 7 days, just 33 deer seen all year. I believe that the wolf harvest goal should be as large as possible in order to as quickly as possible get back to the target number of animals that was set several years ago. You could in fact halve the population and still be above the target number. We all realize that predators have a place and a roll in our ecosystem. There is a balance that can be achieved between having a healthy, even robust, deer population, while still having a reasonable predator population (of which we hunters are also a predator). But right now, there is no balance. There are far too many wolves. Thank you. Please let me know if there's any additional information I can provide. I appreciate the opportunity to offer comments.</p>
Weiss	Terry	<p>I am IN FAVOR of the hunt to try to bring down the population. Terry Weiss Spring Green WI, 53588</p>
Kirsch	J	<p>No more killing of wolves</p>
Gray	Trevor	<p>Please consider that the wolf population in Wisconsin is far to high for the size of the State. Even after the hunt in February wolves were still killing domestic farm animals and domestic dogs which should never be allowed to happen. Please keep the wolf season intact and increase the number of tags to get the population down to 150 or less. Thank you</p>
Ransom	Cathy	<p>To the decision makers in Wisconsin: Wolves are top predators. This means they keep other types of animals from over-running ecosystems. Game hunting of wolves degrades this natural system and tips the balance of natural checks and balances. The many "benefits" of wolf hunting are not science-based. They are based on myths, local lore and superstition. The removal of wolves must be based on science and long-term data; not fear or loathing of animals which keep wild places in balance. You need to ask scientists how to manage the wolf hunting lottery and whether to have it at all. If you ask a hunter whether to have it, the answer is predetermined. Please keep this in mind as you plan the autumn hunting season.</p>
Werra	Tami	<p>Hello, I appreciate the opportunity to provide my opinion. I want to start by stating I do not support wolf hunting. Relying on hunter funding of the WDNR, leads to a narrow focus on managing game animals for a small special interest base and doesn't represent most of the state. I am asking the WDNR to broaden opportunities and increase funding for game and non-game species. As fewer people hunt now and into the future, the continued support of hunting depends on the attitudes of non hunters. I oppose trophy hunting of any kind and that is what Wolf hunting is. The majority of WI citizens are non- hunters and support wolves. Thank you, Tami Werra 414-321-3074</p>
Badeau	Jerry	<p>Please open up the Wolf season this fall for harvesting Wolves. I use to love to hunt and go for walks in the New Wood wildlife area but due to abundance of wolves in that area, I do not feel it is not safe to be in that area at dawn and dusk. Please increase the harvest until the wolves are back to manageable levels. Thank You, Jerry Badeau Merrill Wi., 54452</p>
Peterson-Smith	Mary	<p>Hello, The wolves have to be managed better. Let's learn from mistakes. The awesome responsibility of managing any animal, whether dog, horse, or wolves is to be thoughtful and respectful. This with longevity in mind. Mary Peterson-Smith 15287 Murphy Ridge Rd, Richland Center, WI 53581</p>
Senatori	Megan	<p>I am writing to ask for a zero quota for this year's wolf hunt in November. The effects of the February 2021 hunt upon the population of wolves in our state has not yet been fully studied. The lottery system resulted in a quota that was significantly exceeded, and the rights of the sovereign Tribes to use their quota to preserve the lives of these magnificent creatures was trampled upon. This is on top of the gross cruelty involved in the manner in which the hunt is carried out in our state. Please set a zero quote for this November's hunt, a view that is held by nearly two-thirds of Wisconsin voters across party affiliation, gender, and geographic location. Thank you for your consideration. Sincerely, Megan A. Senatori</p>

Bengry	Brian	As a hunter growing up in Wisconsin. I have hunted since I was 12 and am 46 now. I oppose a wolf fall hunting season or that the quota numbers should be dramatically reduced. I do not believe that they have a big of an impact on the deer population as other hunters and that the ecological benefits of a healthy wolf population far outweigh the negatives. I support the DNR and taking a scientific approach to our resources and not catering to hunters guesstimates and spreading of false information. I don't think it does our state, natural resources or us as hunters any good. This is my input, just because it seems like so many hunters think we need to kill off all the wolves. Thank you, Brian Bengry
Wegner	Chuck	Members of the Wolf Harvest Advisory Committee: As a citizen of the State of Wisconsin, a rural land-owner, and a person who enjoys outdoor recreation, the beauty of our natural resources and the creatures that inhabit them, I feel that I must speak out against the possibility of holding a Wolf "Harvest" with any quota other than zero for the 2021 Fall "Harvest" Season. I realize that the statutes state that a wolf hunt may be held. I also realize there is no set quota for that hunt and I would suggest a quota of zero. I feel that the hunt held in February 2021 was a completely chaotic and disturbing example of what can happen when an event is held without proper planning or controls in place. Wolves are not being hunted to be used as a food source but rather as a "trophy" I am appalled that in the 3 day hunt in February 2021 it is estimated that over 20% of the entire wolf population in Wisconsin was destroyed. I request that, if the Fall Wolf Harvest must be held, you set the quota at zero. Thank you for your consideration,
Mikki	Opahle	The state legislature pushed through a bill that mandated a wolf hunt (Act 169) but that had nothing to do with science nor even broad public support and everything to do with the politicians in power at the time. According to the Public Trust Doctrine, wildlife is to be held in trust for all citizens, including visitors to this state and those not yet born and this state law has circumvented the rights of the majority who are non-hunters and want wolves protected. (1) The purpose of the DNR and NRB is to regulate hunters by deciding the rules they must follow using up-to-date scientific peer-reviewed research, including the rights of all citizens (including tribal members), and adhering to fair chase principals. The February 2021 hunt used a population goal that was set 20 years ago, had a committee that did not reflect the makeup of the Wisconsin population, and allowed practices such as baiting, the use of motorized vehicles and electronic calling devices, killing pregnant females, and more. It is impossible to scientifically determine the biological impact of that three day hunt at this time because it was held during breeding season and carcasses were not required to be turned in to collect data. We also can not know the number of wolves poached during and since the hunt but we know that number increases when recreational hunts are allowed. (2) In addition, the tracking data collected during the winter is no longer valid, collared wolves were allowed to be killed wasting thousands of dollars and hours of research and the other population estimation models have not been tested for reliability as a single resource. For these reasons it is against the WDNR mission statement (3) to make any recommendation other than a zero quota for any hunt within the next 12 months. Thank you for your attention and thoughtful consideration, Mikki Opahle (1) June 2021 Remington Research Group poll that shows how Wisconsin voters feel about trophy hunting and trapping of wolves https://www.humanesociety.org/sites/default/files/docs/Wi%20Statewide%20Public%20Opinion%20Survey%20060821.pdf (2) Differentiating between regulation and hunting as conservation interventions, published in Conservation Biology on September 4th, 2019 (3) WDNR Mission Statement: "To protect and enhance our natural resources: our air, land and water; our wildlife, fish and forests and the ecosystems that sustain all life. To provide a healthy, sustainable environment and a full range of outdoor opportunities. To ensure the right of all people to use and enjoy these resources in their work and leisure. To work with people to understand each other's views and to carry out the public will. And in this partnership
Argelander	Jennifer	Given the overkill or really slaughter of the wolves earlier this year, the Fall wolf hunt should not be allowed. DNR is authorized and charged to limit wolf hunting in order to effectively manage the wolf population. Wisconsin already lost 20% of the population. The number of wolves in this state are too low to lose even another 20%. Setting the kill quota must be a balance between protecting and managing the wolf population so it is not decimated versus the desire for hunting and trapping. What I have seen in the previous hunts is that DNR is NOT Managing to protect wolves. The balance has been in favor of hunters and trappers. It is time to correct that imbalance and protect the wolf population. Until DNR has a handle on managing our wolf population, the Fall hunt should not happen.
Williams	David	As a Wisconsin resident concerned with conservation and ecological sustainability I urge the NRB board and the DNR to suspend any more wolf hunts for the foreseeable future, i.e a zero quota! Prior to February's hastily-called and ill-managed hunt there were an estimated 1200 or so wolves in Wisconsin. As we know in two days the hunt (or "slaughter" as it should be more appropriately described) blew past the official quota and upwards of 300 wolves were killed. According to wolf experts the wolf population in the lower 48 states has still not recovered from the historic slaughters of the late 19th and early 20th centuries and the current ecosystems of the U.S. could support easily support many more wolves. Those concerned with wolf predations of domestic livestock keep discounting the fact that such depredations are relatively few compared to the vast amount of livestock and that all instances of certified wolf depredation are reimbursed by government. I also wish to observe that NRB Chair Pruhn's term has expired and his illegal refusal to step down and make way for his successor (appointed by Gov, Evers) shows to what sordid lengths the servants of the hunter and trapper lobby will go to insure the continued wanton slaughter of wolves and other wildlife in Wisconsin and other states where the hunter and trapper lobby holds sway.
Kratz	Peggy	Why do some humans feel the need to shoot anything that moves? The wolf kill is, simply put, stupid. Stop it. The numbers are proven...wolves are a necessary part of the balance. The more wolves killed, the more deer are hit by cars. Let the wolves control the deer population naturally. The February wolf kill was an atrocity. Do NOT let that happen again.
Albert	Chris	Dear Sirs: As a frequent visitor to Wisconsin I was concerned about the February wolf hunt and am even more concerned about the planned Fall wolf hunt. We have no idea how many wolves were killed, and how many replacement pups were never born. Killing one wolf may well have killed whole packs. Before deciding how many to kill, an attempt must be made to determine how many illegal kills, pregnant females, breeding males and whole packs have been lost. Hunters I know are quite disgusted with the bad press that came from wolf hunt and want to distance themselves from the slaughter that happened. Since hunting is becoming more and more distasteful to more and more people, you might want to explore how to include non-consumptive users in your revenue stream. There is an enormous resource of people who prefer their wildlife alive waiting to be tapped. Thank you for your time and attention. Chris Albert, DVM Lebanon Junction, KY
Benell	Connie	Hello, No long letter. You know wolves are important. I AM ASKING FOR A ZERO WOLF HUNT QUOTA
Green	James and Judith	Time to stop and think this through! What do we have to gain by killing our wolves off and hounds as well. They are both precious animals. Wisconsin has a long history as an environment leader. Stop and think we are the state of Aldo Leopold. Put a hold on the hunt and study the effects for our state for our Wisconsin and not the pressure from groups that do not live in our state. Thank you for your time. James and Judith Green 7153867977

Bergstrom	Sarah	<p>I support a zero quota for the proposed fall 2021 wolf hunt, for several reasons.</p> <ol style="list-style-type: none"> 1. After the February hunt, we do not know enough about the remaining population size and the biological impact. 2. Determining the quota and season dates for the February hunt was not an inclusive process. It appears the process for establishing a fall hunt is using the same non-inclusive process. The voices of non-consumptive users and the Tribes are absent. 3. Wolves respond in unexpected ways to recreational hunting; packs can break up and unstable packs lead to MORE depredation, not less. If you look at the DNR's own records of depredation reports over the past several years, you will see that depredation does indeed seem higher since the February hunt. 4. Without wolves, coyotes in my area are bolder. I personally appreciated having wolves in my area because they pushed coyotes' territory away from my animals naturally. After at least one wolf was killed in February from my pack, I have noticed more coyotes in the area, closer to my animals. 5. With the February hunt, the WI DNR violated its mission statement "To protect and enhance our natural resources: our air, land and water; our wildlife, fish and forests and the ecosystems that sustain all life." <p>Along with it, it violated the public trust doctrine to hold and manage wildlife for ALL of the public.</p> <p>I believe this is why you have seen such public outrage on a state and national level in response to the February hunt. We are not all simply bleeding-heart anti-hunting activists...if that were the case, you would see mass outrage and New York Times articles decrying the annual deer hunting season too. No, there was something utterly grotesque about the brutal, cruel nature of this wolf hunt with no regard for conservation that triggered this reaction from the public at large. We trust the DNR to work in the best interest of the public, our wildlife, and ecosystem, and that trust has been violated.</p>
Adams	Wendy	<p>I am writing to express my strong objection to opening yet another opportunity to slaughter wolves. The cull in the spring was initiated and followed through by a small group of people who have no interest in the genuine management of wildlife for our state.</p> <p>In particular I object to the savage use of hounding--basically setting up torturous ordeals for both the dogs and the wolves. Seriously, have we not evolved past this kind of spectacle?</p> <p>Please follow the science and the popular opinion (most people object to wolf hunting) and do not allow the trophy hunters and hounders to mismanage our precious resources.</p> <p>I have lived in both Bayfield and St Croix County and have watched this go increasingly out of control due to the politics of the state and country. Enough!!</p>
B	Fran	<p>Hello,</p> <p>It's important to have Zero quota for the November Wolf hunt.</p> <p>Thank you</p>
Gilmore	Julie	<p>To Whom It May Concern:</p> <p>The Remington Research Group completed a survey that shows how Wisconsin voters feel about trophy hunting and trapping of wolves.</p> <ul style="list-style-type: none"> • Nearly two-thirds (62%) of Wisconsin voters - across party affiliations, hunters, farmers and genders and geographic locations - oppose the trophy hunting and trapping of wolves. • The majority (68%) believe the February hunt killed excessive numbers of wolves. • Most (68%) voters are convinced that using steel-jawed, leghold traps or strangling neck snares on sentient wolves is intolerable and 66% oppose using packs of GPS radio-collared hounds to track and hunt wolves. <p>I am asking to not do another slaughter of these beautiful and majestic creatures that are a part of our ecosystem. Zero Quota!</p>
Senatori	Adam	<p>Zero quota. Period. Stop killing wolves.</p>
Johnson	Josh	<p>Hello,</p> <p>Please don't bow to the loud minority. WI targeted wolf population is 350 wolves. We are well beyond that and beyond DNR's estimates. As you saw hunters filled their quota in 3 days.</p> <p>There is a lot of false information being spread regarding a over harvest. And while the "non native hunters" did exceed the quota via legal actions, the "native" hunters did no harvest any. Leaving us just a handful of wolves over the legal limit.</p> <p>The only thing I would change about this hunt is not allowing non WI residents to apply for the tags as wolf advocate groups and hunters from other states are buying tags and either not using them or taking the opportunity from a tax paying WI resident. Which is sickening. Wolf patrol also needs to be dealt with regarding the illegal harassment and unwanted filming of hunters paired with the unauthorized sharing pictures of minor children on the wolf hunt.</p> <p>I hope this email is more beneficial than the thousands of "stop killing wolves" emails you are probably getting. Remember, the hunters are the true conservationists here. Providing more money for habitat and local economy than any wolf sight see'er.</p> <p>Best regards, Josh</p>
Silverman	Mark	<p>Thank you for the opportunity to provide public input. As President of the Wisconsin Animal Protection Society, I ask the DNR to take any measures legally possible to reduce the number of wolves hunted and killed. Also, please eliminate the use of dogs in hunting. Thank you!</p>
Kelly	Stephen	<p>Greetings,</p> <p>I understand that the Wisconsin DNR, the Natural Resources Board, and the Wolf Harvest Committee is they preparing to set a quota for the planned November hunt.</p> <p>I wish them to please set a ZERO QUOTA for the November wolf hunt!</p> <p>There are many good reasons for a zero quota.</p> <ol style="list-style-type: none"> 1. Most importantly, there is NO science-based justification for the trophy hunting or recreational trapping of wolves. None. <p>In addition:</p> <ol style="list-style-type: none"> 2. Just five months ago, hunters blew past the allotted quota by almost 100 wolves during the February "hunt." (That number is likely higher as it does not include wolves taken by poachers.) 3. The hunt occurred during the breeding season. Pregnant females were likely killed. Wildlife biologists won't know for some time what effect that will have on the future population. 4. Wisconsin's wolf hunting statute states a single annual hunt shall be held. It does not state what the quota should be. -- A quota of zero can and should be set. 5. Public opinion does NOT support wolf hunting. A recent poll (conducted by Remington Research Group) shows that: (A) Nearly two-thirds (62%) of Wisconsin voters - across party affiliations: hunters, farmers and genders and geographic locations - oppose the trophy hunting and trapping of wolves! (B) The majority (68%) believe the February hunt killed excessive numbers of wolves. (C) Most voters (68%) are convinced that using steel-jawed, leghold traps or strangling neck snares on sentient wolves is intolerable, and 66% oppose using packs of GPS radio-collared hounds to track and hunt wolves. <p>Please take actions that will set the wolf kill quota at ZERO.</p> <p>Thank you for your consideration.</p>
Suchomel	Steve	<p>The wolf is a apex predator thriving in a wilderness environment. Wisconsin is not a wilderness environment.</p> <p>Wolves and humans do not interact well if either of the populations is dominant. The wolf in northern Wisconsin has proven it's protected dominance and has migrated southward, very much into non-acceptable areas. The migration has occurred due to an over-population of wolves and the ability of nature to disperse surplus populations. It is either disperse or disease.</p> <p>The society acceptable amount of wolves has been far exceeded. The negative economic impact has been felt in the north woods.</p> <p>Let science determine the harvest amounts.</p> <p>There is a wolf management plan on record. The DNR had sufficient time to update this plan. The DNR choose to let it sit until the endangered status was removed. The lack of a decision is a decision. A failure to act on their part should not make a crisis on the public.</p> <p>It is acknowledged that the DNR probably won't allow harvest numbers to bring the wolf population to the 350 animals identified in the current wolf management plan. But have the harvest reduce the current population to a more acceptable number closer to 500 or even 700 wolf population.</p> <p>Above all, learn from the western states as to how to manage wolves. The emphasis is on management, not the current lack of direction or understanding of impact. Let science be the guiding beacon, not emotion based on a non-existent wilderness environment.</p>
Quamme	Lynn	<p>I am requesting a zero quota for wolves. Please stop the slaughter & recreational trapping of wolves.</p>
Kremenski	Kathy	<p>Please have a zero wolf quota for the fall hunt. I am totally oppose to any type of wolf hunt, but realize that this is probably not going to happen. What I am asking is Wisconsin have a better understanding regarding wolf management. I also hope that we, as a society, have more humane limits on how these hunts are allowed. Traps, baiting and hound hunting should be banned. These are cruel and abusive practices.</p>
Race	Peggy	<p>Hello-</p> <p>I am writing to ask for zero quota for the November wolf hunt. There is no science based evidence that trophy hunting or recreational trapping of wolves is the best way to manage the wolf population.</p> <p>Thank you-</p>
Miller	Flora	<p>Unnecessary wolf hunt</p>

Klein	Gloriann	<p>Re: WDNR Fall Wolf Season Comments</p> <p>Previous comments have been submitted to the WDNR and NRB that can be referenced in the context of having a required WI wolf hunt despite overwhelming public objection to how the wolf hunt & quppotas have been mishandled & ill-advised thus far due to a legal injunction forced upon the WDNR.</p> <p>So will the WDNR make significant changes or reevaluate a fall hunt based on input from this committee? Following are some key points that need to be considered:</p> <ol style="list-style-type: none"> 1. The Feb 2021 wolf hunt exceeded the quota by 86% and the ramifications on its impacts on wolf breeding season will not be fully realized for some time thereby calling into question the need for a fall hunt. 2. The quota should be to manage wolves, not decrease the population to a 20 year outdated number. It must be based on scientific data by wolf and wildlife biologists, not special lobbying interest groups. Given that the WDNR has refused to gather vital necessary data from carcasses from the Feb hunt, any future hunts must incorporate the necessary sampling for future wolf population monitoring. 3. The wolf hunt is a management tool for depreddating wolves, not a blind trophy hunt. Wolves are known to teach their pups how to behave and hunt. Creating voids in territory, splitting packs and taking out experienced wolves will invite more problems. 4. There is a serious discrepancy in the population occupancy modeling data results that differs from the ground tracking actual count that must be addressed prior to any future hunt. This discrepancy is skewing the population numbers and potentially misrepresenting the actual wolf population numbers. 5. WI Native American Tribes in the ceded territories must be included and participate in all planning phases as accorded by legal and legislative statutes. Overriding their "use" quota is a flagrant violation of treaty rights. <p>Setting a quota for the fall should follow the science, not well known misnomers and misconceptions. Proceeding with a fall harvest with a 20 yr old outdated 1999 wolf management plan that is still not updated and published with current data is premature and inviting more political problems and possible legal action.</p> <p>We have learned much about the ability of wolves to adapt to a changing landscape. Any wolf harvest must factor in current scientific data and consult with wolf and wildlife biologists on the impacts in which altering the population numbers of one species will have on the entire ecosystem. Perhaps it's time to reevaluate wolves not just as a species to harvest - instead recognize how they serve a multitude of roles in an evolving landscape - recreational, environmental, ecotourism, and outdoor enthusiasts to all Wisconsinites not just a select partial few. Without knowing the actual current wolf population numbers, scientific data and seeing an updated wolf management plan - how can a specific quota recommendation be decided upon? Until the necessary scientific data is provided any quota numbers are without merit and mere guess-work. Update the WI Wolf Management Plan and consult with the wolf experts before implementing a Fall hunt.</p> <p>Sincerely, Gloriann Klein Wolf Info Now</p>
Rowen	James	<p>I urge you to disallow in the fall wolf hunt - and in future hunts - hunting of wolves at night, or aided by dogs, or assisted by leg traps and snares or by other practices which violate the principle of Fair Chase. I urge you to factor into your deliberations the science that demonstrates wolves' role in the removal of diseased deer from the herd and acknowledges the value of wolves to the overall health of the forest. I urge you to further implement those guidelines by honoring the significant, pivotal place of wolves in the traditions and origin story of Native Americans who were first to live in what is now Wisconsin, and whose holistic and integrated view of the natural world and our shared environment places a greater and life-affirming emphasis on moderation in harvests and takings.</p> <p>In short, I implore you to be effective stewards of all Wisconsin wildlife whose care is entrusted to you by history, law, and common sense.</p>
Saulnier	Pamela	<p>Members of the Wolf Harvest Advisory Committee,</p> <p>I am writing to strongly urge that you assign a ZERO QUOTA to the planned November 2021 wolf hunting season here in Wisconsin.</p> <p>I ask for a zero quota because the February "hunt" did measurable damage to our wolf population. The quota was exceeded significantly and, out of a population of just over 1,000 wolves, well over 200 were killed. Because the hunt was held during breeding season, wildlife biologists won't know for quite some time what impact the February "hunt" had on pack dynamics or population numbers. Without a doubt pregnant females were included in those kill numbers.</p> <p>Holding another wolf "hunt" this year would be nothing but poor management of this majestic apex predator that is still recovering from the devastation of human destruction. Environmental science simply does NOT SUPPORT the hunting of grey wolves.</p> <p>We need to manage ALL of our Wisconsin resources so that we have an ecosystem that is in balance and not just providing hunters with targets.</p>
Herrera	Beyonce	<p>Hi, I have a comment on Wisconsin wolf slaughter. There is no scientific-based justification for the trophy hunting or the recreational trapping of wolves. Nearly 2/3 of Wisconsin voters oppose this, a zero quota can and should be set.</p>
Barbieri	Nancy	<p>The February 2021 wolf hunt was a decimation of a returning species, not a fair hunt.</p> <p>First of all, hunting dogs should not be allowed to slaughter the wolf population!!! It was unfair, and the "legal harvest" of wolves in February was disregarded. There was No System, no method to the madness of this slaughter!</p> <p>Also, do you understand what happens when wolf packs are broken up by killing the members randomly? The surviving wolves are FORCED to hunt alone or without the advantage of working together as a pack, and the easiest prey to kill for food to live is livestock. Thus, the surviving "lone wolves" kill cows and sheep, exacerbating the problem further. The surviving Wisconsin members of this species needs a chance to repopulate and form new relationships to live, to hunt, and to establish itself again.</p> <p>Packs must be allowed to form to work together to kill deer again for food. Wolves are social animals that survive in pack units. This is a fact.</p> <p>The DNR must consult experts to move ahead regarding this species. Hunter Nation should not be allowed to dictate the hunting of wolves. (Their aim is self-serving only!) In addition, judges who are pro-Hunter Nation should not be allowed to make such critical decisions without taking into consideration the future of this species in Wisconsin and in the United States. Such decisions should be decided by the Wisconsin Supreme Court, or at least by a body of impartial individuals. This is not a political issue!!</p> <p>Please, please do not allow this to happen AGAIN!!! Please listen to the other tax payers and people of Wisconsin. We have a voice too, and our voice was ignored in February, before the excessive killing of wolves in Wisconsin was allowed to happen, tarnishing our reputation in the world and severely damaging our ecosystem.</p>
Reynolds	Brian	<p>Thank you for taking feedback from citizens and hearing concerns regarding the wolf population in Wisconsin. Hopefully the decisions about season and quota will be based on facts and hard data rather than emotion and drama.</p> <p>As a lifelong hunter, outdoor enthusiast, and sportsman in WI it is clear that the current wolf population has exceeded all expectations when reintroduction efforts started decades ago. Wolf sightings are now relatively common, livestock and domestic animals including hounds are killed by wolves, and population of various game animals appear to be down. Numbers for these incidents and population changes vary but the trends are absolutely clear.</p> <p>It is imperative to implement a harvest that will help control the increasing wolf population before critical and irreversible changes to the Wisconsin ecosystem are realized. A reasonable quota of wolf harvest permits can help maintain balance in the food chain while simultaneously providing an outlet for sportsmen to be included in the management of the growing wolf population.</p> <p>Please identify a reasonable quota of harvest permits and an appropriate season length to maintain balance in the Wisconsin ecosystem.</p>
Conway	KE	<p>Please protect and preserve wild Wolves in Wisconsin by setting a zero quota for this fall's detrimental 'wolf hunt'.</p> <p>This indigenous species will not survive another massacre.</p> <p>Thank you.</p>
Premo	Mary	<p>Please stop the November 2021 wolf hunt. The effect of the February 2021 wolf hunt has left our livestock in greater danger due to the killing of Alpha wolves. It is also time to stop the use of dogs to hunt wolves. Our state is sanctioning dog fighting. It's disgraceful, and embarrassing, besides expensive.</p> <p>Thank you, Mary Premo Verona, WI 53593</p>
Tomaselli	Gina	<p>Please stop killing wolves. This is so barbaric.</p>
Premo	Phil	<p>Hello,</p> <p>I am 100% opposed to ALL wolf hunting and trapping in Wisconsin. I find it reprehensible that wolves are hunted as trophies, barbarically trapped and killed, and that packs of dogs may be used for wolf hunting. I am a dog lover, but am further infuriated that hunters may be compensated for dogs killed during a wolf hunt! Don't use dogs for such a purpose!</p> <p>Please stop the November 2021 wolf hunt(set a zero quota), end all wolf trapping, and prohibit using dogs to hunt wolves.</p> <p>Thank you,</p>
ODay	Jennifer	<p>Zero quota</p>
Noltze	Marv	<p>I am expressing my desire that the Wisconsin DNR install a zero quota for the November hunt.</p> <p>There is no legitimate reason for hunting Wolves. I do not support trophy hunting and too many people will exploit the stability of our Wolf population beyond what it can sustain.</p> <p>Sincerely Marv Noltze Stevens Point</p>

Solawetz	Erin	<p>For 30 years I have lived in and explored this wild and diverse state we call home. I have canoed its winding rivers, camped in its remote northern forests, and worked in unpopulated areas of the driftless. In all that time, I have never once had the privilege to gaze upon a wolf in the wild.</p> <p>With the passing of Wisconsin's first wolf hunt in many years, it is crucial that we reflect upon what was needlessly lost and plan for a future of sustainable and peaceful coexistence. As apex predators, these elusive canids are far more intelligent and vital to our ecosystem than any other managed species. I urge you to take the following points into consideration when creating and assessing Wisconsin's Wolf Management Plan and Fall 2021 quota.</p> <p>Do the research! No amount of factual information is too great to obtain. There are an infinite number of possible variables that can skew data. A handful of studies are not representative of the entire state's wolf packs. Do not disregard the importance of pack structure. Wolves are far more intricately woven than other species hunted and managed in Wisconsin. How will removal of specific members, such as alphas and pregnant females, affect the livelihood of the pack? Wolves deserve to not just survive, but thrive.</p> <p>Finally, I implore you to above all put Wisconsin's wolves first. Do not be swayed by political agendas, appeasing budgets, or greedy trophy hunters. Let us do right by these majestic creatures so that all who are fortunate enough to live in and visit this great state may have the opportunity to appreciate what I hope to experience one day. Our wolves are our legacy, as well as our responsibility. As we have seen in other parts of the country, if we take too many, the effects can be irreversible.</p>
Vetter	Rita	<p>I am against the so called harvesting of wolves as done in Wisconsin. It should be illegal to use dogs to hunt them as only 0.2 of the wolves DNA is different from the dogs.</p> <p>There also was a survey that showed that around 2/3 of Wisconsinites are against wolf hunting. The last hunt in Wisconsin was illegal but they did it anyway. I guess they will do anything to get their way. Why should the state pay for dogs that are maimed and killed when their owners are allowing this disgusting travesty to happen to them? Any other place in Wisconsin it would be considered cruelty to animals and they would never be able to own a dog again and would have to pay a stiff fine to the government. There have been numerous studies that show that your breaking up the wolf packs and many pups will die. That makes inaccurate numbers for how many wolves are actually killed because of this. This is an inhumane way to hunt making them suffer so horribly. More illegal activities have been increasing during their last hunt. The forest land is NOT just for hunters. Most people use the land for the flora and fauna and to enjoy the beautiful country that Wisconsin has to offer. They come to camp, fish, vacation etc. and enjoy the wildlife and splendor and solitude of this great state. Just knowing what has been happening with the wolves and the dogs makes me want to vomit. This is wrong.</p>
Kosowicz	Aleks	<p>Please disregard my previous 'comments,' as they were sent in error and are not my own. The truth is that I was compiling all the scientific data I could to compose my message and accidentally touched 'send' on my iPad. But, really, we all know the science. To say the wolf hunt of earlier this year was misguided would be the gentlest of euphemisms. We know that our packs were jeopardized at the worst possible time, are now jeopardized, and will be jeopardized further if a fall hunt is allowed. We know that fractured packs' wolves will now be more inclined to depredation. We know that these apex predators are responsible for regulating healthy ecosystems and that upsetting their numbers upsets the balance of every other species' in those ecosystems--as we face a self-induced mass extinction. We know these things.</p> <p>My comments today, rather than reiterating the scientific reasons we should be allowing no other management of species than by proper wildlife biologists at this point, consist of the betrayal I feel as a Wisconsinite who values our wilderness above all and has been proud her whole life of the place she calls home as a refuge for wildlife and those who love it like I do. This is my wilderness too, after all, my wolves, and I am sickened by the lack of respect for all that we have to lose. I'm worried by the MULTIPLE stressors on our natural resources and the species with whom we share our state.</p> <p>I ask that you take to heart these feelings (but especially the science) as you deliberate on the specifics regarding a second wolf hunt in 2021. And I'm not predisposed to sharing my feelings, incidentally. Please treat this issue with the utmost consideration, as it is bigger even than the wolves. It's as big as ALL of Wisconsin.</p>
Fitzsimmons	Paula	I'm asking for a zero quota for the November wolf hunt.
Beula Kovacs	Corrie	<p>Regarding the potential Fall Wolf Hunting Season in WI for 2021, I am writing to request a ZERO QUOTA.</p> <p>I live in WI, I pay taxes in WI, and I vote in WI.</p> <p>A Zero Quota would protect the wolf population from legal killings and still will not stop poaching or illegal kills, which I believe is unfortunately inevitable.</p> <p>Thank you, Corrie A Beula Kovacs Neenah, WI</p>
Nelson	Linda	<p>•Fall Wolf Season Harvest Quota</p> <p>The quota for the fall season needs to be a conservative hunt. The reason for this is due to the overharvest of wolves in the February 2021 hunt. Also, the hunt was done during the breeding season and pup production and breeder status is not available. Without this data, the quota again needs to be conservative until we have data on these items. The modeling program that has been implemented by DNR will not provide this data for this next season either.</p> <p>This season needs to concentrate on wolf conflict areas. A statewide wolf hunt does not address these areas as it was shown in this last wolf hunt season. Most packs are in areas where they belong and not causing conflict and therefore should not be an area of concentration of a fall season hunt. It is not necessary to have a statewide wolf hunt in every zone for wolf. Wolves are a part of the ecosystem in most areas.</p> <ul style="list-style-type: none"> •Night Hunting, Zone Permits, Registering of Animal •Night hunting needs to be eliminated. •Permits should be given out by zone only. Hunters should not be able to go from Zone to Zone when the quota is met. Do not double permits as was done in the last wolf hunt. •The registering of an animal should be done by the end of the hunting day. The animal should be registered in person to determine sex, age, and condition of animal. •RESPECT <p>The most important thing of any aspect of life is respect.</p> <ul style="list-style-type: none"> •Respect the tribes. •Respect the animal – Not only the wolf but the dog. Dog and wolf are not a fair chase for either animal. •Respect the public and their input. <p>Linda A Nelson</p>
Brandt	Tana	<p>Planning a 2021 fall wolf hunt is beyond absurd. There is not enough data pertaining to the actual number of wolves killed in the February 2021 hunt.. Wolves that were injured and left to die, wolves that were killed and not reported. The loss of breeding age male and female wolves was substantial.</p> <p>Aggressive human hunting of wolves can actually result in increased conflict with farmers and more wolf depredation on livestock. Packs are more likely to break apart when alpha members or the majority of pack members are killed, leaving increased risk for inexperienced and single wolves to look for easier prey.</p> <p>Wisconsin wolf population cannot sustain another hunt without a more scientific approach to how the population was accurately affected by the February 2021 hunt.</p> <p>Wolves need to be treated as an important part of our natural resources. Wolves and wildlife belong to all of us, not the select few that think they are here just to be hunted and killed. The majority of the people of Wisconsin are against predator trophy hunting. Wolves are a part of Wisconsin's Public Trust Doctrine. The WDNR did not follow it's mission statement in regards to the February wolf hunt. As a Wisconsin state resident and wildlife advocate, my rights were violated by this hunt.</p>
Vaughn	Drew	<p>To Whom It May Concern,</p> <p>There Should Be NO Debate About What To Do With Wolves In Wisconsin...</p> <p>LET THEM LIVE THEIR LIVES IN PEACE!!</p> <p>They Are NOT A Menace... They Are At The Top Of The Biosphere In Our State!</p> <p>Humans Are The Ones Who Are Encroaching On THEIR Territory!</p> <p>Their Species Was Here Long Before Our.</p> <p>Just Because We CAN Determine Their Fate... Does NOT Mean We Should Interfere With Their Domain.</p> <p>Stop Killing Wildlife.</p> <p>A Second Season is ABSURD!</p> <p>Thank You For Doing The RIGHT Thing... And Letting Wolves Live!</p>

Ciano	Christina	<p>To the DNR Natural Resources Board :</p> <p>I am a lifelong resident of Wisconsin who values the state's wildlife, parks, clean air and water. I am one of many WI citizens who strongly oppose the Fall 2021 wolf hunt. I-We recreate throughout the state, buy park stickers and trail passes every year. We regularly participate in the annual Spring Conservation Congress. Some of us even buy hunting licenses. We are a broad and diverse group who strenuously object to a second wolf hunt in the Fall of 2021.</p> <p>The WI DNR did not follow it's mission statement in regards to the February wolf hunt and the state violated the Public Trust Doctrine. The public trust doctrine says that wildlife belong to all citizens of Wisconsin, and they are held in trust for the public. It is absolutely imperative that the WI DNR and the NRB fulfill their responsibility to wolves as a public trust natural resource. They must do this by supporting the further development and implementation of scientific wolf management practices using current scientific and cultural information, which they neglected to do in February.</p> <p>I understand that WI DNR receives 90% of its funding from the sale of hunting and fishing licenses (according to a January 2017 internal report). I also know that hunters as a group are substantially declining in numbers. The DNR as a result of this reliance on such ample funding by one minority faction, has narrowly shaped their focus on game animal management to serve the interests of this dwindling special interest group. Hunters should not wield such a massive influence on wildlife management policies. The DNR has an obligation to increase funding for conservation action that benefits game and non-game animals alike and increase opportunities to birding groups and other Nature enthusiasts that prefer wildlife to be living and breathing. The majority of Wisconsinites do not hunt and want healthy wolf populations on the landscape, free from harassment and soundly managed with scientific criteria.</p> <p>I value and respect wolves, because, unlike humans, they are necessary apex predators, essential to ensuring a healthy ecosystem. In 1995, the biologists at Yellowstone National Park introduced 20+ Canadian gray wolves to the park. Their presence has kept the ballooning elk population in check, which, in turn, created more biodiversity of plants, birds and mammals, and reestablished ecological balance in that corner of Wyoming.</p> <p>I also support Wisconsin wolf management but it needs to include public input and thorough scientific analysis as required by law. The DNR and NRB need to listen to not only sportsmen and women, but also conservation groups, tribal leaders, and interested citizens to establish goals and build broad public support for responsibly managing wolves.</p> <p>What I and many Wisconsin residents ultimately demand from the WI DNR is an answer as to what your agency, which is responsible for protecting the state's resources, is going to do to prevent another catastrophe, another overkill that was the February wolf hunt???? Is the DNR going to continue to bow to pressures from out of state hunting groups to mismanage Wisconsin's wolves? What about bears? Bobcats? The February hunt was a shameful event. A Fall hunt is utterly unacceptable. Please listen to the people of Wisconsin. We oppose a Fall wolf hunt.</p>
Wall	Maureen	<p>Attention WI DNR:</p> <p>I am very much opposed to the Feb. Wolf Hunting season being ever repeated again. It was poorly organized and allowed for the killing of female wolves during breeding season, with few or no restrictions on how or when the wolves could be killed, allowing for the use of dogs who were then put in harms way while out hunting wolves, allowing for the killing of wolves from snow machines, and allowing for a 24 hour delay in reporting wolves that were killed, thereby resulting in 83% more wolves being killed than the quota allowed for. This was a tragedy and a debacle that should never be repeated. Shame on the DNR.</p>
Aughey	Dan	<p>I've been following this for several years now—the "hunts" (if snaring or hounding can be called hunting) that chase down families of wolves, not discriminating between young nor old, male nor female, even other species that get in the way, are reminiscent of recent history. History does repeat itself.</p> <p>If my schooling serves me correctly, there was another annihilation that happened. Hitler decided that Jews were no longer needed and posed a problem to the "Superior Race". So, he sent his "dogs" to run them down and indiscriminately slaughter them. No matter the age nor gender they were killed—a heinous crime all of humanity vowed would never happen again.</p> <p>Well, it is happening again. A species is going to be wiped out because someone has decided the wolf is not wanted, is a threat. Will this Hitler stand by his decisions? Will his henchmen?</p> <p>Please, remember what happened to them.</p> <p>Please, remember the innocent souls lost for no reason. I'll pray for your souls and the souls of the innocents killed—wolf and dog alike.</p>
Boucher	Willie	<p>I respectfully ask that you allot a ZERO quota doe the November wolf hunt. I realize that there are many stakeholders involved, but based on all of the evidence it seems like the state is advocating a sport hunting of a rare animal that is vitally important to our ecosystem based on a few (while they may be traumatizing) experiences involving wolves that can possibly be prevented by other means. I don't mean to minimize any loss of life or property anyone has suffered, but studies have shown how vital wolves are to ecosystems and and the reintroduction of a native species benefits the entire state.</p>
Wood	Elizabeth	<p>I am opposed to a fall Wolf Hunt. Enough destruction of the wolf population has been accomplished in 2021. The cost to the wolf population may or may not be measured. The cost to the entire State of Wisconsin both in our environmental integrity and our commitment to protecting our natural resources will never be quantified and therein lies the true damage. Sportsman and environmental advocates are opposed to a wolf hunt that is being driven by out of state dark money and by a small group of hound hunters. The entire State of Wisconsin should not be forced to pay the bill. No fall wolf hunt should be allowed.</p>
Plantivore LLC Nelson	n/a Kathy	<p>No wolf hunt please.</p> <p>In five months, Wisconsin wolves could face another horrendous hunt. Another massacre would be detrimental to the survival of this keystone species. I urge you the Wisconsin DNR and the Natural Resources Board to set a zero quota for the November wolf season.</p> <p>Please read, "A Call to End Wolf Hunting in Wisconsin" - a comprehensive analysis of the tremendous population loss and utter cruelty of Wisconsin's February 2021 wolf hunt, including a look at how the state undercounted wolves killed by poachers.</p> <p>Please take time to look at the results of a new poll (conducted by Remington Research Group) that shows how Wisconsin voters feel about trophy hunting and trapping of wolves.</p> <ul style="list-style-type: none"> •Nearly two-thirds (62%) of Wisconsin voters - across party affiliations, hunters, farmers and genders and geographic locations - oppose the trophy hunting and trapping of wolves. •The majority (68%) believe the February hunt killed excessive numbers of wolves. •Most (68%) voters are convinced that using steel-jawed, leghold traps or strangling neck snares on sentient wolves is intolerable and 66% oppose using packs of GPS radio-collared hounds to track and hunt wolves. <p>Why ask for a zero quota?</p> <p>The answer is quite simple. There is no science-based justification for the trophy hunting or recreational trapping of wolves.</p> <p>Also:</p> <ul style="list-style-type: none"> •Just five months ago, hunters blew past the allotted quota by almost 100 wolves. That number is likely greater as it does not include wolves taken by poachers. •The hunt occurred during the breeding season. Pregnant females were likely killed. •Wisconsin's wolf hunting statute states a single annual hunt shall be held. It does not state what the quota should be set at. A quota of zero can and should be set. •Not to sound like a broken record but again, there is no science-based justification for the trophy hunting or recreational trapping of wolves. <p>Thank you, Kathy Nelson</p>
Klemm	Rebekah	<p>I am a Wisconsin resident and I'm writing to request a zero quota for the November wolf hunt. It's appalling to me that people enjoy killing animals, and the idea that we as a society would twist ourselves into knots to come up with reasons to "justify" such violence is beyond me. Just leave the animals alone and go on with your day, it's really not that difficult.</p>
Herning	Scott	<p>To whom it concerns. Below are my comments regarding fall wolf season. Submitted by Scott Herning, 1529 Logan Ave. Marinette, WI.</p> <ol style="list-style-type: none"> 1. The February 2021 Wisconsin wolf hunt violated public doctrine. The integrity and professionalism of the Wisconsin Department of Natural Resources and the Natural Resources Board was greatly compromised. This shall be seriously considered in any future decision making. The public trust doctrine is rooted in ancient Roman law and the Wisconsin Constitution. It places a duty on the state to hold environmental resources in trust for the benefit of the public. 2. Wolves are sacred animals to all tribal peoples myself included (Menominee). The power of the wolf brings forth instinct, intelligence, appetite for freedom, and awareness of the importance of social connections. This animal also symbolizes fear of being threatened and lack of trust. Wolves are a powerful symbol of wilderness. Hunting wolves during breeding season, at night and with dogs and snares is seen as highly disrespectful, wasteful and criminal. Enabling this type of hunting exacerbates violence in our communities. 3. Wolves are a keystone species, protecting ecosystem health and balance. Having predators on the landscape—wolves, bears, mountain lions and coyotes— also provides a protective gauntlet that can help slow the spread and prevalence of deadly diseases. 4. Disrupting social structures in wolf families, aggressive human hunting of wolves results in increased conflict with farmers, and more wolf depredations on livestock. Wolf depredations are occurring now in Wisconsin after the February 2021 wolf hunt at an increased rate. https://dnrx.wisconsin.gov/wdaccp/public/depredation/2021 5. The WDNR receives the majority of funding from the sale of hunting and fishing licenses. This is a conflict of interest and shall be further considered in regards to decision making. 6. Wolves save human lives. According to a recent study by a natural resources economist at the University of Madison, deer vehicle collisions go down 24% once wolves colonize a county. https://nypost.com/2021/05/25/wolves-scare-deer-and-reduce-auto-collisions-study-says/ 7. To ensure transparency and integrity of character, all WDNR scientific findings in regards to wolf seasons, et al. should be peer reviewed by an independent, third party science advisory committee. <p>Thank you for your time</p>

Ruedinger	Kyle	<p>I have thoughts on the wolf hunting. I am very saddened how it was executed in our beloved state earlier this year. For one, more than the allocated number of wolves were killed, which is not ideal for their long term survival. I can't believe we rushed it through and killed many pregnant wolves so cruelly. I am a veterinarian, and unfortunately the use of dogs by hunters in Wisconsin for both wolves (and bears), continues to be a problem as we have so many people who use the dogs and do not care for them with injuries and proper husbandry. Dogs should be banned from hunting wolves. NO OTHER STATE allows this. The dogs get injured and suffer too. And for some reason Wisconsin tax payers get stuck with dog/bear/wolf costs to special hunters.</p> <p>We should not allow night hunting of wolves. We should not allow people to run them down with ATVs and Snowmobiles. And perhaps most importantly, leg holds and neck snares should be banned and outlawed immediately. Along with any chemical means such as sodium cyanide that are used some places. These methods of death are all cruel and cause unnecessary suffering and harm to death, not to mention that leg holds, neck snares, and NaCN kill many unintended species in wildlife, pet dogs, and even children in some case reports out west.</p> <p>If we are to have a wolf season for management, it needs to be humane, effective, and regulated; because unfortunately people can't be trusted to do that right thing with this. Guns to kill the wolves humanely like we do with deer. We should NOT be baiting wolves to run upon a neck snare. And please don't kill them in their breeding season.</p> <p>Thanks you for your attention to this matter. I hope Wisconsin can do better in the future.</p>
Mae	Carol	I am opposed to another wolves hunt this fall & coming spring 2022. I believe there should be restrictions. No dogs, no killing of wolves wearing a GPS collar, & no females. A license for out of state should be very expensive to support the DNR. The wolves are needed to control CWD. No hunting on private land
Webster	Steve	I urge the establishment of Zero Quota for our Wolf Wildlife. Our Wisconsin Wildlife is a part of our wonderful Wisconsin environment that means so much to us as we live in our beautiful state. Our Wildlife (including Wolves) is part of that State Environment that we all treasure. Please establish a Zero Quota so we can maintain all parts of the State Nature that we all treasure. Thank You. Yours Aye, Steve Webster
Warner	Patricia	<p>Wolf Harvest Committee:</p> <p>I urge you to set the 2021-22 wolf kill quota at zero. You have not established the current number of wolves in the state, nor can you at this time.</p> <p>Winter count surveys cannot be considered as they took place before the February hunt. Although you have a tally of dead wolves that were registered, you have no accurate estimates of how many more were poached or succumbed to poisonings and inflicted wounds. Additionally, since virtually every one of the state's wolf packs was either decimated or destroyed, pup production and or survival will be virtually non-existent this year and next year if another disastrous hunt takes place.</p> <p>Public survey and poll results continue to mount revealing that Wisconsin opinions are changing. The wolf billboards are up and ethical hunters from around the state are beginning to have their voices heard. In Wisconsin in 2020, 680,733 or 12% of the state's residents purchased hunting licenses. 88% of Wisconsinites do not hunt. An even smaller percentage of the state's residents are the wolf hunters: 27,000 people applied to hunt a wolf, that is 0.46% of Wisconsin's 5.8 million residents less than one half of one per cent.</p> <p>Continuing this hunt is not only unconscionable and cruel, it is economically unsound. It is unfortunate that you think you are dependent on hunting licenses as your main source of revenue when in fact, administrative costs of hunting and trapping can indeed exceed those fees. Paid staff need to set regulations, conduct law enforcement and monitor wildlife populations.</p> <p>It is counterintuitive that a handful of the state's population is able to dictate to the DNR how wildlife is managed exclusively for their benefit, namely, hunting and trapping. The U.S. Bureau of Economic Analysis stated that in 2019, \$7.7 billion was spent in Wisconsin on various outdoor activities such as kayaking, camping, hiking, travel and tourism. Of that figure, only 1% was spent on hunting and trapping.</p> <p>Sincerely, Patricia Warner Minocqua, Wisconsin 54548</p>
Baxa	Jim	<p>It still is astonishing how the quota was exceeded so quickly. This use of snowmobiles, really? Wisconsin showed the United States how a regulated hunting program is not successfully administered, this was a black-eye to our State. The Department of Natural Resources should be embarrassed, but unfortunately this department is critically understaffed/funded and cannot be held at fault.</p> <p>A updated and better plan is needed, if it requires permits to be held for a couple of years while this is completed then that is the direction to move forward. The hunters got almost two years of quota. The claims of over population is false, these animals were tracked/located in advance more easily with technology. They now will enjoy the overpopulation of deer for hunting over the next couple of years.</p> <p>Take a step back, examine what went wrong so quickly (two days), those who received permits this year will be banned for a minimum of five years for receiving permits in the future. Examine and limit the use of hunting practices during the season. Incorporate more science based data when drafting and updating hunting regulations.</p> <p>Good luck with this task, and if we make the national news let it be an example for other states to follow.</p>
Elavsky	David	<p>This fall the wolf harvest quota should be zero. The Feb. Wolf hunt went way over quota. This was a rushed hunt and it was not based on any scientific studies of our wolf packs. Native American and others who recreate in the forest opinions were cast aside. A small group of hounders and politicians seems to be the ones controlling the wolf hunts, Not the DNR, Scientists, farmers, hunters, campers, and Native American Tribes. Public lands belong to all. The wolf packs have been decimated by the Feb. Hunt. A hunt this fall would be catastrophic to wolf populations. The use of hounds to hunt wolves is the equivalent of dog fighting. As an ethical hunter who follows fair chase rules, hound hunting for wolves disgusts me. Wolves are valuable for keeping deer populations healthy. The large public forests can accommodate healthy wolf populations with very minimal predation of livestock. In fact, when wolf packs are broken up predation on livestock increases. Most Wisconsin citizens are opposed to hounding and wolf hunting. The Natural Resource Board ignores this and listens to in and out of state hounding groups. I want to hear and see wolves in the National Forests not the constant sound of hound dogs barking and honking horns to locate lost dogs. Wolves are an Important part of the ecosystem. They are more Important than a trophy hunters ego. These unnecessary hunts are not looked fondly on by the non hunting public. To keep our hunting heritage alive, hunters must adhere to the highest ethical and fair chase standards. These wolf hunts have not done that. It is not enough to say that wolves must be hunted without scientific, Native American, hunters, recreational users, and the general publics input. Please have a zero quota for this falls wolf hunt. Sincerely, David Elavsky 1418 144th Street New Richmond, WI 54017 phone 651-324-0139</p>
Ogren	Brian	I am completely opposed to a fall wolf hunt in Wisconsin
Mayer	Christopher	<p>Greetings to Whom it Concerns,</p> <p>I would like to add my comments regarding the subject of Wolf Hunting in Wisconsin.</p> <ol style="list-style-type: none"> 1. I do not believe that enough care has been taken into account for the damage done to our wolf population through the hunting season taking place while the breeding season is in progress for the wolves. There seems to be a lack of consideration for accurate information on the disruption of packs and pups through indiscriminate killing of large numbers of these animals. A stricter quota is in order based on science, not the desire of trophy hunters. This past season was a disgraceful display of the rampant disregard for science and life. 2. The use of dogs should be banned permanently! It is a barbaric practice and cruel beyond good conscience. 3. No night hunting should be permitted or the use of snowmobiles and ATVs in chasing down the wolves. If people must kill an animal in the name of sportsmanship, then they should act like true sportsmen. 4. We as human beings have a duty to protect and maintain the natural world given to us through creation. To disrupt and decimate stable packs of wolves does nothing but create more problems of conflicts with livestock and people. We should be aware of the benefits these animals provide in maintaining a healthy environment for everybody in the state. <p>I hope you will consider these thoughts when making your decisions for the Fall Wolf Hunting Season in Wisconsin. As a lifelong resident and user of the natural beauty of our state I would like to know that the wolves will be around in healthy and sustainable numbers for my children and grandchildren to enjoy for their lifetimes.</p> <p>Sincerely, Christopher Mayer 1237 Market St.</p>
Dallmann	Allyson	<p>To: Fall Wolf Hunt Committee From: Dr. Allyson Dallmann</p> <p>I am deeply concerned that even after the short-sighted and aggressive wolf kill in February, you would even consider a fall hunt. As a doctor of Veterinary Medicine, I know that amount of loss especially during breeding season was DEVASTATING to the family structure and reproductive capabilities of the families affected. We estimate that 60-100% of the wolf packs lost ALL pups! Biologically, this is unsustainable for the future of a viable wolf population which, as a keystone species, is essential for a healthy ecosystem and especially for healthy ungulate populations as wolves select ill individuals for their kill. I must point out that, unlike wolves, hunters target the biggest and healthiest and actually reduce the genetic integrity of the given species.</p> <p>The vast majority of us are non-consumptive users, only 4% of people hunt, so the WDNR must consider our opinion and needs to enjoy our environment. The February hunt violated the Public Trust Doctrine and I was personally hurt by this loss and their suffering. I feel a special connection to wolves as they are family oriented and sentient beings contributing not only to the ecosystem, but also inspiring awe moments when we are fortunate enough to hear or see them. The opportunity to experience these healing moments have become rarer with hunts like these and it ruins my enjoyment in the natural world. Wildlife belongs to all of us and each kill takes one more opportunity for joy and healing away from me and those who feel the way I do.</p> <p>I am completely against a fall wolf hunt, especially as there are fewer already and non-hunters are not being heard.</p>

Roscoe	Corey	<p>RE: Fall Wolf Season Comments</p> <p>Dear Wisconsin Wildlife Officials,</p> <p>Wisconsin's wolf hunting statute states a single annual hunt shall be held. It does not state what the quota should be set at. A quota of zero can and should be set.</p> <p>I am asking for a quota of zero (0) wolves for the November wolf season. I will be attending the June 22 meeting to see if the state is truly interested in science-based management or will continue to work on behalf of special interest groups.</p> <p>Thank you,</p> <p>C. Roscoe</p>
Bertsch	Sarah	<p>As a resident of WI and life-long lover of wildlife and as one who owns a cabin in wolf country, I am writing to express my ABSOLUTE OPPOSITION TO HUNTING OF WOLVES IN WISCONSIN, in particular for the sake of this comment period, OPPOSED TO A FALL WOLF SEASON. I am particularly opposed to trapping, snaring & use of dogs. These means are unquestionably beyond the so-called ethics of any so-called mindful hunter. Traps & snares are indiscriminate and result in torture of countless "peripheral" wild and domestic species (like pets). It is impossible to effectively control the number of wolves taken during a season - this has been proven in the past when quotas were far surpassed.</p> <p>The fact is that far more people in Wisconsin want to LIVE WITH wolves than there are those who want to slaughter wolves.</p> <p>And the fact is that wolf hunters routinely trespass on private property themselves and/or their dogs without permission. By the time a pack of dogs are running wild on one's property, it's hard to fight the hunter (armed and often intimidating) into getting them off.</p> <p>Please, Wisconsin does not need a fall wolf season. It doesn't need a wolf season at all. Don't be swayed by a small number of special interest dollars. Wisconsin stands to make a lot more money from preserved wilderness & wild animals due to a huge eco-tourism industry which is absolutely booming, especially now that covid restrictions are being lifted. People want to be outside in nature, with nature, with wild animals, including top carnivores like wolves.</p> <p>The argument about wolves preying too many domestic animals is simply false and consistently misused.</p> <p>If people simply cannot live in Wisconsin with wolves, then they are the ones - these humans - that should go, not the wolves.</p>
Ballard	Susan	<p>When setting a quota for a fall hunt, please keep in mind that:</p> <p>Our Wisconsin process was hijacked by out of state interests and because of that we already had a 2021 hunt which killed twice as many wolves as planned, packs were decimated and full data is not yet available on effects on wolf recovery, the vast majority of Wisconsin citizens are against killing wolves for sport.</p> <p>Set a quota of zero.</p>
Sexton	Jeff	<p>Good day. Thank you for reading my email.</p> <p>I am in favor of a full wolf season. I spend a lot of time in wolf country and I can assure you there is no shortage of wolves. I sincerely hope your decisions will be based on science and information from people who know, not the opinions of city dwellers who think wolves are cute and endangered.</p>
Celesnik	Marian	<p>To the members of the Wolf Quota Committee,</p> <p>In the fall hunt I urge you to take the conservative approach with a very low quota and low number of permits.</p> <p>Whatever population numbers you have are only estimates after the February hunt. The amount of illegal kills this year is also hard to know. A trapper I spoke to from Ashland County said he had caught five wolves in coyote traps: those wolves got shot, not released. While the average of wolves taken by poaching is 10% a year (per Adrian Wydeven, wolf biologist, at a recent speech in Stevens Point), in this year it could be much higher this year. In addition, the unprecedented hunt during breeding season will further reduce the wolf population.</p> <p>For the February hunt the NRB doubled the quota recommended by the DNR, ignoring wolf biologists. There were more hunters out there than wolves. No other species is managed this way. This brings into question whether Wisconsin can manage a delisted species. Or are we committed to the old way of killing as many wolves as possible, disregarding their ecological value.</p> <p>By culling out weaker deer, wolves are more efficient than hunters at reducing the number of deer with chronic wasting disease. We have CWD in the southern part of state and wolves in the north. Is that merely coincidence or, as Adrian Wydeven has suggested, could the wolves be holding down the spread of CWD north?</p> <p>Federal delisting gives Wisconsin the opportunity to manage wolves. The management plan that is in the works now should address concerns of many stakeholders. So please restrict the quota and permits.</p> <p>Thank you for considering my comments.</p> <p>Sincerely,</p> <p>Marian Celesnik 1734 Sheridan Dr. Madison</p>
Pavlovic	Jennifer	<p>This past February's wolf hunt was poorly managed, horrific and out of control. In just three days, hunters and trappers killed 218 wolves, almost double the allowed quota of 119, and nearly 20 percent of the state's entire estimated population of 1,000-plus wolves. 160 of those wolves were killed on public land.</p> <p>Wolves were lured with bait and mercilessly chased and hunted day and night using dogs and snowmobiles. Moreover, the legally required consultation with tribal governments did not occur prior to the hunt.</p> <p>An outdated Wisconsin law requires a wolf hunting/trapping season be held when wolves are not federally listed - however, the Wisconsin Department of Natural Resources (WDNR) can prevent the slaughter that occurred in February from occurring again in November by regulating the quota, form, hunting hours, timing and methods allowed.</p> <p>Please take the following measures to protect Wisconsin's wolf population:</p> <ul style="list-style-type: none"> • Prohibit hunting practices that will have negative impacts on the long-term health of the wolf population. Exercise the precautionary principle when setting a quota to prevent more harm to the wolf population. Critical data is missing on pack disruption, pup survival, number of illegal kills and number of wolves killed but not recovered. A quota must take into account the impact of the breeding season hunt on the wolf population. • Prohibit the use of dogs to hunt wolves. Wisconsin is currently the only state that allows the use of dogs to hunt wolves. • Prohibit night hunting of wolves. • Protect stable wolf packs. Blanket and disorganized hunting of stable and established wolf packs can create disruptions that lead to increased conflicts with people and livestock. <p>Thanks for listening to the people of Wisconsin and taking action to prevent past mistakes from damaging our wolf population again in the future.</p>
Collins	Paul	<p>I find it appalling that citizens are expected to comment before noon on 6/18/2021 about the setting of your kill quota despite there being no information released about population estimates following the February overkill. How about setting a quota of ZERO rather than giving in to the hysteria and propaganda of those that hate this species? What occurred in February was an affront to science, ethics, and basic decency. For all of the talk about wanting to "manage" the gray wolf like any other species I am seeing very little of that put into action. All I see is an agency that refuses to listen to the MAJORITY of citizens that do not want to see this small population of gray wolves used as a political pawn by legal dog fighters, disingenuous politicians, and extremist special interests. What would the reaction be if the deer or bear population were allowed to be killed off to a token and politically based number? There would be absolute outrage and justifiably so. It's also long past time that the Wisconsin DNR and Natural Resources Board actually listen to the vast majority of citizens that do not hunt, trap, or hound our wildlife. We are also citizens of Wisconsin and we deserve equal representation when decisions are made about our wildlife that is held in the public trust for ALL citizens. Why are our voices given less weight than those that seek to eradicate this population of animals from the landscape? These wolves are to be held in the public trust like any other wild species in our state and ALL citizens should have their input weighed equally.</p> <p>Due to the refusal of the Wisconsin DNR to release any accurate population numbers or provide any biological appraisal of the damage done to the gray wolf population in our state from February's slaughter there should be a quota of ZERO.</p>
Michel	Heidi	Zero quota please!
Butts	Bonnie	What happened in February should never have happened

Resch	Mark	<p>Members of the Wolf Harvest Committee,</p> <p>I have been a hunter and outdoor enthusiast for over fifty years. I was thrilled back in the seventies when I learned that wolves had returned to Wisconsin, adding to our biodiversity. While I am not opposed to a wolf hunt, I was appalled at what transpired last winter. Please take out the politics and reinvolve the science, as we do for our other game and nongame management of our public resources.</p> <p>The Public Trust Doctrine was violated, doing a disservice to all hunters. Hunters make up a small population of residents in this state, last year's hunt did nothing but create a greater divide between true sportsmen and the general public, hence jeopardizing the future of our opportunities to hunt and view wildlife.</p> <p>Follow the science, what should proper population goals be, how should we manage wolf conflicts, how do ensure all hunters have an opportunity to hunt, how do ensure that we do not over harvest? How do we educate the public about a wolf management plan, all citizens need to have a voice. I suggest we have a one year hunting moratorium until the full impact of last year's slaughter is fully evaluated and a properly devised plan, based on science, with citizen input and education included.</p> <p>Mark Resch</p>
Koeppen	CJ	<p>To whom it may concern,</p> <p>Please do not allow people to hunt wolves. They are a very important part of our eco system. These innocent animals do not deserve to die for any reason whatsoever. If the DNR allows this, it's absolutely appalling and the rest of the country will shame the state (myself included). Our dogs that we love and call family share 99.9% genetics with these beautiful creatures. PLEASE set a ZERO quota for November.</p> <p>Concerned citizen, CJ Koeppen</p>
Rendino	Loren	Please set Wolf hunting quota at zero!
Yehling	Karin	<p>I'm an avid outdoors woman and a lover of all things nature.</p> <p>It is my hope that you'll examine the latest science when determining quotas for the fall hunt. Although after violating the Public Trust Doctrine in the February wolf hunt, I'm not sure who you'll listen to besides the 4% of hunters out there.</p> <p>Wolves have an important place in our ecosystem. They're nature's "cure" to Chronic Wasting Disease. They help balance the system and are necessary for a healthy ecosystem.</p> <p>Anytime you kill a wolf, you mess up the dynamics of their pack. You've potentially increased chances that the alpha role will be filled by a younger wolf who isn't a good hunter yet and he/she may seek out livestock. So, that's not the wolves fault; that's man's fault.</p> <p>I'm really encouraging you to get rid of the hunts. There's no need for them. Wolves keep their own populations under control. They're not overhunting the ungulates and they're keeping control of diseased animals by killing them.</p> <p>So, please listen to your citizens and to science. If you did, these hunts wouldn't continue.</p>
Webster	Margie	<p>Dear DNR wildlife managers.</p> <p>I request a zero quota for November hunt. The February hunt was a disaster and we do not yet know the effects of the mismanaged hunt on the Wisconsin wolf population.</p> <p>In addition, Wisconsin needs to come up to speed with what the majority of Wisconsin residents want. There is no scientific justification for recreational killing of wolves for trophies, and the methods allowed by Wisconsin are inhumane.</p> <p>Please do your job to manage our wild resources for all Wisconsin residents, not just cater to the small group of trophy hunters.</p> <p>thank you, Margie Webster La Crosse</p>
Theilhelm	Britney	<p>NO Fall WOLF HUNT</p> <p>The wolf hunt that took place this year in February was a complete slaughter that had to be called off on day three due to over hunting. It was so devastating that it made news across the country and globe and was an embarrassment to Wisconsin.</p> <p>No Wolf Hunt! Zero Quota!</p>
Glantz	Ben	<p>Hello,</p> <p>I am writing today to voice my opinion on the fall wolf hunt. I think a fall wolf hunt is needed to help manage the population of Wolves in Wisconsin. We have a population that can sustain and thrive with a hunting season and regulated harvest numbers.</p> <p>Thank you, Ben Glantz Sun Prairie, WI</p>
Gasbarro	Donna	Please cancel the wolf hunts! I oppose the hunting & killing of wolves & I oppose using dogs for this purpose.
Kirchman	Beth	<p>Would like to request a zero quota for November Wolf season</p> <ul style="list-style-type: none"> Nearly two-thirds (62%) of Wisconsin voters - across party affiliations, hunters, farmers and genders and geographic locations - oppose the trophy hunting and trapping of wolves. The majority (68%) believe the February hunt killed excessive numbers of wolves. Most (68%) voters are convinced that using steel-jawed, leghold traps or strangling neck snares on sentient wolves is intolerable and 66% oppose using packs of GPS radio-collared hounds to track and hunt wolves. <p>Please cease this senseless hunt.</p>
Knoll	Keith	<p>Hi - I'm writing to request that the DNR establish a quota of zero for the wolf hunt this fall in Wisconsin. I'm a Wisconsin resident living in Wauwatosa. I'm an avid outdoor enthusiast. I love nature and have continued to support Wisconsin State Parks and Forests. I'm not opposed to reasonable hunting, but am absolutely opposed to the way wolf hunting has been sanctioned and carried out in Wisconsin.</p> <p>Thanks for listening.</p>
Kiphardt	Kirstin	<p>Hi,</p> <p>I'm writing to request a zero quota for the wolf hunt this fall. Please feel free to contact me if you have any questions.</p> <p>Thanks, Kirstin Kiphardt</p>
Deemer	Maggie	<p>Hello!</p> <p>I urge you to set a zero quota for the November wolf hunt. Things are known for getting out of hand and some lives die that don't need to!</p>
Stall	Dave	<p>Dear Sirs:</p> <p>Wolves are an integral part of a healthy ecosystem, therefore I believe that they should be protected from any harm except when necessary. I will not dignify what these people do by calling it hunting; what they are doing is merely killing and the sad fact that they enjoy it says a lot about their character. Wolves are intelligent and social beings like us, and like us they deserve to live.</p> <p>Sincerely, Dave Stall Madison</p>
Albrechtson	Cory	The February wolf hunt was a madhouse slaughter.. Please don't make Wisconsin look ridiculous again this fall. Make the quota zero for November.
McGuinness	Clodagh	<p>As a WI resident we are urging you to cancel the next wolf hunt.</p> <p>We are not a state of sadism and animal torture justified by fake science.</p> <p>Please reconsider this hunt so we are not once again on the front of time magazine for cruelty and wildlife torture.</p> <p>Thank you Clodagh mc guinness</p>
Driessen	Leigh	<p>Why on earth did we reintroduce wolves to Wisconsin? So we could have the fun of torturing them with leghold traps and neck snares? Terrorize them with GPS collared dogs (what cowardness on the part of hunters)? Why are out of state groups driving our DNR policy? Fight back!!! If wolves are such a problem, let's humanely trap them, spay and neuter them, and gradually eliminate them from Wisconsin. But don't allow leghold traps, neck snares and GPS collared dogs. Zero Quota November Wolf Season! C. Leigh Driessen, 400 N. Richmond Street, #302, Appleton, WI. 54911. 920-257-1432</p>

Voss	Jean	<p>Wisconsin Fall Wolf Season Comments June 17, 2021</p> <p>Biodiversity. What does it mean? It should mean EVERYTHING to all of us! Managing wildlife as it is currently managed does none of us any good on a long term basis if management practices primarily focus on sustaining a more or less farmed environment of wildlife to feed humans, to provide income from fur sales, etc. We are failing ourselves, future generations, and what remains of our existing ecosystems. It is imperative that wildlife management in Wisconsin shifts its main objective to invest in long term approaches which yield greater consideration to sustaining entire ecosystems. Ultimately, plant life that may seem insignificant now, microorganisms that are driving forces behind healthy vegetation, and more, are critical components necessary to create a healthy balance in nature.</p> <p>Apex predators play a key role in balancing the health of our forests, wetlands, prairies, and waterways. Songbird populations are declining in part due to loss of habitat from over browsing of deer and rabbits. CWD is rampant. Diseased trees are on the rise in forests and cities, partially due to the lack of birds available to control insect infestations.</p> <p>What is our end game? Do we keep the wolf population numbers lower or higher and why? Do we primarily manage the wolf population to provide an opportunity for trophy hunting, to absolve responsibility of risky hunting, livestock or pet owner practices? Do we manage the wolf population for purposes of creating balanced ecosystems? Does the concept of striving toward balanced ecosystems outweigh the immediate demand for continuing short term goals?</p> <p>February's wolf hunt took place because it could. Did it take place to manage healthy ecosystems or did it take place for purposes that provided short term satisfaction to some, but long term damage as a whole for sustaining ecosystems? It is troubling that the value of this apex predator has been discounted as little more than a perceived threat or potential trophy.</p> <p>The term "conservation" ideally should mean more than reducing or increasing populations of any wildlife without serious consideration on how the presence or absence of that species impacts what is natural and beneficial within the plant and animal community it resides. Livestock, pets, and hounds are not part of nature's equation.</p> <p>I propose that the Wisconsin wolf hunt scheduled to begin in the fall of 2021 set a quota of zero, ban night hunting, require a show of carcass within twelve hours in the event of a hunt, and only manage the effects of wolves rather than setting a goal for a specific population. It is reasonable to assume that the spring hunt of wolves significantly impacted reproduction. The public trust doctrine was violated without question in regards to the spring hunt and would be violated again if there was a fall hunt. The majority of Wisconsin citizens disapprove of a wolf hunt.</p>
Cornell	Robin	<p>Wolves are a keystone species. Nearly 2/3 of Wisconsin voters oppose the trophy hunting and trapping of wolves. The February hunt killed excessive number of wolves. The use of leghold traps and snares is cruel and barbaric. Further, it's unsportsmanlike to use packs of dogs with radio collars to hunt wolves. Wisconsin is the only state to allow this. It is just another example of how the DNR panders to hunters, as if no one else matters.</p> <p>There is no science-based justification for trophy or recreational hunting of wolves. In February, hunters killed far more than the allotted quota by almost 100 wolves. That number doesn't include wolves killed by poachers. Since that hunt happened during breeding season, pregnant females were likely killed.</p> <p>Please set the quota at zero. Thank you!</p>
Kraly	Chris	<p>Wolf Harvest Committee:</p> <p>Please set this Fall's Wolf Hunt Quota at zero. It is important that wolves do not become extinct in our State or across the nation. If we continue to hunt them, they are headed for extinction. This would put our ecosystem off balance and both animals and humans will suffer the consequences. There is no need to kill any more wolves. They are a self-sustaining species, as science has proven across the world, in particular in Yellowstone, Isle Royale and Slovakia.</p>
Wegner	Cheri	<p>Good morning!</p> <p>I am writing this morning regarding the upcoming fall wolf hunt. I understand you will be meeting to set the quota for this hunt. I would like to express my opinion and desire that the quota should be set to 0.</p> <p>As a life-long Wisconsin resident, I have always valued and treasured our natural resources. Wisconsin is an amazing state! But a wolf hunt such as occurred this past spring is not so amazing. The quota was far exceeded, and the pictures and stories I saw were horrendous. I could quote all of the statistics and surveys that have been done, but I'm sure that you are well aware of the information and are receiving many emails with those details. So this is more of an emotional plea on my part. I'm not sure our state's wolf population can withstand another hunt like the spring hunt. We worked so hard to reintroduce them to our state, to wipe them out in this fashion is unconscionable. Breeding pairs were slaughtered and they were killed with no mercy, only for sport.</p> <p>Please, I beg you, our state has got to be and do better. Please set the fall wolf hunt quota to 0. Don't let there be a repeat of past horrors. Let's be responsible Wisconsinites with the ability to make sound decisions and the responsibility to protect all living things.</p>
Tynan	Joyce	I urgently request that you set a quota of 0 wolves for the second Wisconsin wolf hunt this year.
Chapin	Suzanne	<p>I hope we never again have a wolf hunt like the one that occurred a few months back. As you know, the high kill-rate of wolves made national headlines and the state of Wisconsin put itself to shame.</p> <p>Wolves are intelligent and form close family units. We have NO business killing these beautiful creatures.</p> <p>Cancel the hunt.</p>
Bohn	Cheryl	Please set a zero quota for the November wolf hunt. I really felt sick when I heard how many more wolves were killed over the quota last November. I would like to see the end of wolf hunting! Steel traps, neck snares and GPS hounds are really inhumane in hunting wolves. If another hunting season occurs like the last one this would really endanger the species. Please consider. Thank you, Cheryl Bohn (Milwaukee)
Aughey	Judy	<p>I wanted to write a few paragraphs but once I got started there was so much for me to say that I couldn't stop. Please read my entire letter as it is very important to me and I am a voice for many other wildlife supporters.</p> <p>Those who are eager to kill the wolf say that wolves kill too many deer, jeopardizing their fall deer hunting season. The true predators that they should be concerned about are the dogs they use in hound hunting. These hounds are trained to kill with caged animals, before they are let loose in our forests. They are not specifically trained to hunt/kill only bear and wolves. When they are set free to track in the forests they will kill anything that they come across, raccoons, rabbits, deer, bobcat, coyotes, bears and wolves. All wildlife is endangered by hounding in our forests. The forests and woods belong to our wildlife and hound dogs do not belong in their territory to chase, surround and tear them apart alive after they are run down to exhaustion. Six or more dogs on one animal. How can that be fair game?</p> <p>No one knows how many wolves were actually slaughtered recently. How many went unreported as the killing free for all took place? How many females died along with their pups in their bellies? This is truly a sadistic act that should not have been allowed during their mating season. How can any human get satisfaction of doing this to innocent animals or most importantly, how can this be legal in our state? Wisconsin is the only state in our country that allows hounding, legal dog fighting. You should be ashamed.</p> <p>Allowing another trophy hunt again in November should not be allowed. Wisconsin already had its one required "hunt" and the outcome will not be known for a long time. Our wolves belong to ALL WI. citizens and we have not had a say regarding their future. A recent poll was conducted which proved that over 62% of WI. voters do not want another wolf hunt this Nov. And 66% of the people disapprove of wolves being "hunted" by radio collared hounds.</p> <p>What's happening to our wolves makes me sick and breaks my heart. It's just a trophy blood sport not a hunt. The wolf is not eaten, only wasted for a thrill kill. When this was going on I couldn't think of anything else except our wolves being slaughtered. I could feel the sheer panic and fear that they were feeling. One minute minding their own business in the woods then hearing the hounds approaching. Many packs scattered only to be run down by the hounds to be ripped apart. No records to show how many really died. Many were left where they lay. Killed for no reason at all except for the thrill to kill an innocent animal. Their videos show these people picking up their dead wolf to pose for a picture only to throw it on the ground like a piece of garbage. You should check it out to see what really happens in our woods.</p> <p>The same scenario occurs with bear hounding training starting July 1st through August 31, chasing down our bears during the heat of summer. Many bear cubs are separated from their mothers and are killed by hounds. And mothers are surrounded and killed defending her cubs. It's not bear season but they are being killed by hounds. An my last point...more wolves will be killed and unaccounted for during this summer bear hounding. This is when their pups are brought to rendezvous sights and adults fight to defend their young from the hounds. The number killed will also be unaccounted for. We won't know the number of wolves left after being wiped out before a Nov. hunt. NO NOV HUNT and stop hounding on our wildlife.</p> <p>Judy Aughey Madison, WI.</p>
Ritter	Carol	We agree with those requesting a zero quota be set for the November wolf hunting season in WI. We believe that the methods used by hunters were inhumane, and that the hunt was authorized for political reasons only. Recreational or trophy hunting of wolves in WI is not indicated by any scientific data. Please act in the interest of wildlife and a balanced ecosystem.
Mitchell	Steve	Nearly every year when I make out my tax returns I make a donation to Wisconsin's endangered species believing that this money is used to protect and preserve habitat, and increase the viability of threatened species including the state's wolf population. Last Fall's wolf harvest was a slap in the face. I am deeply concerned with what transpired in the recent wolf hunt. Wolves are an integral part of the ecosystem and management of the population should reflect this. The relationship of the wolf to the Native American community should also be paramount. The recent politically forced hunt did not reflect these values. We can and should do better.
Holmes	Jack	I am firmly against the killing of any more wolfs !
Brady	Erin	Please make it a zero quota hunt. Nearly two-thirds (62%) of Wisconsin voters - across party affiliations, hunters, farmers and genders and geographic locations - oppose the trophy hunting and trapping of wolves.
Mae	Carol	Given the cruel & excessive hunting, there should NEVER be spring hunting & no hunting this fall. Rules need to be in place to avoid cruelty & hunting only allowed on certain lands. No hunting of wolves with a GPS collar.
Kitzinger	Jana	Please cancel the wolf hunt! Killing one animal type throws off the whole ecosystem. Humans just need to control and own everything and should realize what we're doing is wrong. We need to leave them be and be respectful of their territories as humans encroach more and more on their homes. Killing isn't conservation, they should have protected areas. Nature will take care of itself if humans quit intervening for profits. Jana K.
Wolfgangramm	Renee	<p>Hello DNR,</p> <p>I'm a Wisconsin citizen and would like a zero quota for the fall wolf season.</p>

McElroy	Kimberley	The fall wolf kill should be cancelled. There is no way to know what the spring kill has done to the population. Killing wolves willy nilly without any thought to the gene pool, alphas, pregnant and nursing females is not only stupid it is short sited. The damage done will not be known for years. It is our duty as citizens of Wisconsin and this world to protect these animals and the ecosystem. They were on the endangered list for a reason, are you really prepared to put them there again? I will hold everyone responsible that is involved in these decisions to do the right thing and protect these wolves.
Hoff	Norbert	Good evening. I own 40 acres in Taylor County, Town of Jump River and would like to comment that something MUST be done with the wolf population in that area. I am 1/2 mile North of Spur Rd. and West of Hwy. 73 about 2 miles. Over the last 3 years the number of wolves seen on trail cameras has increased dramatically. At night, while sitting in the yard, you can hear them start to howl within an hour after sunset. Since buying our property we have seen a corresponding decrease in other wildlife (grouse, turkeys, deer) as more wolves are seen. This past winter, we found out first wolf kill on our property which did NOT make me happy either. We are to the point whenever we are outside with our two Labradors my wife, son and/or myself has a pistol within reach. I used to get LOTS of turkeys on the trail cams and used to flush a high number of grouse. Now I know grouse numbers have declined in the county, but has anyone ever taken a look at the possibility of the wolves attributing to this? Not saying they are 100% responsible, but just another factor, albeit a large one. Regulations be damned, a wolf goes after one of my labradors, it will pay the price. This situation has gotten worse every year and after looking at my trail cameras last weekend (I have 5 on my 40 acres) I may just go fishing over gun season. Please listen to the SPORTSMEN & WOMEN and significantly increase the wolf harvest numbers. I would imagine DNR personnel are wise enough to tell who is on the side of the Anti's and who isn't. Thank you for listening.
Arauz	Jorge	Dear DNR, Please halt the killing and merciless trapping of wolves in Wisconsin. I am a mental health professional. As such and as a person of faith, I believe that recreational activities that truly uplift one's soul must be informed by respect for ourselves and for nature. The current DNR policies concerning wolves in Wisconsin do not reflect nor promote such type of respect. Thank you for your attention.
Rahman	Zakia	To the concerned person, As an animal advocate and a concerned citizen, I request you to make the wolf hunt quota to zero. Let us not witness another massacre of these wolves instead allow them to live peacefully in their habitat undisturbed by humans. Your kindness will be appreciated always.
Allen	Chris	Hello, I respectfully request the DNR to set the quota at 0 (zero) wolves for the November wolf hunt.
Schrank	Barb	I am requesting that the Department of Natural Resources sets the quota at ZERO (0) for the November 2021 wolf hunt.
Hurchison	Katherine	I write to urge a ZERO quota for November's wolf hunt. Just five months ago, hunters blew past the allotted wolf quota by almost 100 wolves. That number is likely greater as it does not include wolves taken by poachers. The hunt occurred during the breeding season. Pregnant females were likely killed. Wisconsin's wolf hunting statute states a single annual hunt shall be held. It does not state what the quota should be set at. A quota of ZERO can and should be set. There is no science-based justification for the trophy hunting or recreational trapping of wolves. Moreover, a recent Remington poll of Wisconsin residents showed a solid majority (62%) oppose the trophy hunting and trapping of wolves, and even more oppose the specific methods used to trap and hound them.
Smith	melissa	I am sending these comments on behalf of just myself, Melissa Smith. The agency and this committee need to start realizing that our constituencies are changing rapidly, as our the values about wolves. You have a duty, under the public trust doctrine, to deliver much different expectations and results of what wolf management in Wisconsin should be. What you are giving to the public in terms of quotas and management is not best available science, population models or accurate information. It's political and not ethical. This is why we have this back and forth seemingly divided issue. Wolves are not a divisive issue. The majority of Wisconites favor wolves on the landscape at the population they are at now. What makes it divisive, is that you arent changing with our values. You refuse to see the world as mostly a non hunting public that do not want to see wolves hunted for sport. The harvest committee is still very much traditionalists while your constituencies are increasingly mutualists, in terms of their expectation of your decision making role in accordance to wolf management I hope you would rather learn about the interconnection between healthy forests and healthy watersheds and soil health and wildlife health and ultimately human health. It's not going to just be the hard sciences that have a role to play. It's stories, values and ethics. We need innovators and problem solvers not those who want to go straight to the gun, hound or traps to solve a perceived problem, the wolf. I recommend zero quota for this Fall's hunt and zero quota into the future.
Dunkin	Alan	I am incredibly disappointed by Wisconsin's failure with both allowing and mismanaging the wolf hunt. Are we back in the 19th century? Why are you letting a small group kill off a species integral to a healthy ecosystem? Do any biologists work in the DNR? This is not management by any stretch of the imagination. Why would I bother buying products from or visiting Wisconsin when you continue to support barbaric, antiquated, non-scientific policies to support the smallest of a vocal minority? The public trust doctrine says that wildlife belong to all citizens of Wisconsin, and they are held in trust for the public. I believe it is imperative that the WDNR and the NRB fulfill their responsibility to wolves as a public trust natural resource by supporting the further development and implementation of scientific wolf management practices using current scientific and cultural information. 1.The WDNR did not follow its mission statement in regards to the February wolf hunt and the state violated the Public Trust Doctrine. You need to stop the next hunt from happening before you enable the obliteration of the rest of the state's wolves. 2.Determining the quota for the February hunt was not an inclusive process. You let the minority dictate for the majority, none of which was based on science but rather old west myths and fears. The quota, season dates, and reporting structure did not ensure that a sustainable population of wolves would be maintained and a fall hunt is following the same processes. 3.The biological impacts of the February 2021 hunt, held during the wolves' breeding season, will never be fully understood due to a lack of important biological data collection. Impacts to the overall population, and impacts to specific local wolf packs, cannot be known. Wisconsin's Green Fire (WGF) states in their recently released Conservation Bulletin "Although there are significant uncertainties associated in making a prediction based on limited information, we believe that based on loss of bred females and alpha males, it is reasonable to estimate that 60-100 of Wisconsin's wolf packs may lose all pup production due to the February 2021 hunt. If this impact is realized it will represent 24-40% of the expected reproduction from 245 known wolf packs outside of Indian reservations in Wisconsin." 4.The WDNR receives 90% of its funding from the sale of hunting and fishing licenses, according to a January 2017 internal report. There is a steady decline in the number of recreational hunters nationally, as only 4% of people now identify themselves as hunters (National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. 2016). Relying on hunter funding leads to a narrow focus on managing game animals for a small special interest base. WDNR needs to broaden opportunities for non-consumptive users, and increase funding for conservation decisions that benefit game and nongame species. As fewer people hunt now and into the future, the continued support of hunting depends on the attitudes of non-hunters. Most support hunting to obtain meat, and oppose hunting only to obtain a trophy. The majority of Wisconsin citizens are non-hunters who support wolves. A model of tourism to see live wildlife is a more realistic plan for the future. 5.Wolves respond to human hunting pressure in surprising ways. Packs are more likely to break up if an alpha animal is killed, which can cause an increased risk of younger, more inexperienced wolves to attack "easy" prey such as livestock, as these wolves lack the cohesive pack unit. Aggressive human hunting of wolves can actually result in increased conflict with farmers, and more wolf depredations on livestock. Wolf depredations are occurring now in Wisconsin after the February 2021 wolf hunt at an increased rate. You should already know this if you're a biologist at this point. 6.A reliable wolf population estimate will be lacking when quotas are set for the proposed fall 2021 hunt. WGF's recommendation that "WDNR wildlife biologists must make their best efforts to assess and model the impact of the 2021 February hunt, including estimating illegal or unregistered kills, removal of pregnant females, and loss of alpha males on the wolf population. Current population models and population estimation methods should also be assessed for reliability. This impact analysis should be completed and made available to the Wolf Advisory Committee prior to WDNR's development and public release of 2021 fall harvest quota alternatives." Thanks for reading and please do better for the ecosystem. We're in a biodiversity crisis and future generations deserve to know what a healthy environment with wildlife looks like. It's 2021, not 1921. Please update your policies to reflect this.

Smith	Gilda	<p>We have got to decide what kind of people we are going to be. Children learn what they live. Cruelty should not be the lesson we teach our children nor the legacy we leave behind. We have to raise the standard of taking responsibility for those who can't help themselves. Stop this, now. There is no science-based justification for the trophy hunting or recreational trapping of wolves. It's just senseless cruelty. You know this.</p> <p>Also: Just five months ago, hunters blew past the allotted quota by almost 100 wolves. That number is likely greater as it does not include wolves taken by poachers. The hunt occurred during the breeding season. Pregnant females were likely killed. Wisconsin's wolf hunting statute states a single annual hunt shall be held. It does not state what the quota should be set at. A quota of zero can and should be set. Not to sound like a broken record but again, there is no science-based justification for the trophy hunting or recreational trapping of wolves.</p>
Weberg	Melanie	<p>League of Humane Voters - Wisconsin (LOHV-WI) is requesting a ZERO quota. LOHV has never been supportive of wolf trophy hunts. On top of that, two wolf trophy hunts in 9 months is attempted genocide of a species who hasn't recovered from February 2021. Furthermore:</p> <ul style="list-style-type: none"> •WDNR has not and will not have enough regulations in place to protect wolves. •WDNR will not have accurate meaningful population numbers including poaching numbers. •WDNR has a 22-yr. old management plan. •WDNR betrayed their partnership with indigenous tribes once again in February by failing to uphold their treaty obligations. •WDNR has a WI public majority that does not want wolf trophy hunting, a public that has no clue as to what is going on right now. <p>In the end, the cycle of ESA listing and delisting will continue until WDNR demonstrates that our state is capable of protecting wolves. A November 2021 wolf killing will push wolves closer to ESA listing again.</p>
Kall	Linda and Steve	<p>It had been our dream to move to the wilderness where we could experience hearing or seeing in my opinion the true symbol of the wilderness, the wolf. After, finding our dream home in Price County there has been a wolf hunt/slaughter and we do not hear or see wolves. We have also spoken to our neighbor who lives on 160 acres and he too has said that he no longer sees or hears the wolves. Moving to the state of Wisconsin that is allowing our dream to crumble has been a huge disappointment for us. We are tax payers here too and deserve to be heard on this matter. There should be absolutely no more quota at all!</p>
Oelerich	Matthew	<p>End wolf hunting, simple as that. We have already killed why to many Wolves for sport. Stop killing animals for shitty reasons...</p>
Harkin	Jean	<p>Dear DNR folks for Wisconsin-- I am concerned about the extinction of wildlife on our planet, and wolves are getting a bad rap. I hope that in your upcoming guidelines for wolf management that you will consider the following and not allow wide-ranging killing of wolves:</p> <ol style="list-style-type: none"> 1) By killing wolves indiscriminately, humans are upsetting the natural order of wolf populations and causing more problems. (See #3,) 2) A majority of Wisconsin citizens deemed the massive wolf kill last fall as "overkill" and inappropriate. 3) A recent study (reviewed in "The Week" magazine) showed that wolves in Wisconsin have been responsible for a lower than average number of deer-vehicle car accidents, thus saving countless humans from injuries and deaths due to these accidents, because wolves naturally prey on deer. Wolves have kept the numbers of deer off the road. 4) Wolves are often blamed for livestock deaths that were actually caused by other animals, including coyotes and dogs. <p>Thank you for considering and balancing the lives of wolves with human needs.</p>
C	Lisa	<p>I oppose any planned wolf slaughter in Wisconsin this year. It was literally a national and global embarrassment what happened in February in Wisconsin at the last wolf slaughter. Please respond to this email with how you were capturing the publics opinion and will you be able to provide numbers of people who opposed us and those who were for a fall Wolf hunt?</p>
Robbins	Samantha	<p>Please set a zero quota for the November wolf hunt.</p>
Strauss	Susan	<p>Dear Committee Members,</p> <p>I live in Oregon with many friends and colleagues who live in Wisconsin. Like many, I am distraught over Wisconsin's February forced hunt of wolves during the pupping season and against the scientific advice of the state wildlife biologists. The purpose of our wildlife agencies is to protect recovered populations not destroy them. The February hunt smacks of hatred not wildlife management. This cannot be the sentiment guiding our national wildlife policy.</p> <p>I have studied wolves for 50 years. I have watched them hunt in the wild and read all the science I can get my hands on. We are rural people. My husband and daughter are hunters who would never consider killing a wolf. We know the science shows that indiscriminate hunting of wolves increases livestock predation and the only intelligent way to manage wolf/livestock issues is by trained state biologists. Wolves prefer to eat wild undulates and will balance their reproduction based on prey populations. Human hunts of wolves disturb wolf family structures (essential to enables wolves to hunt wild game) and scientific research shows that this disturbance will only lead to increases in livestock predation.</p> <p>We buy all of our beef from predator friendly ranches — of which there are increasingly more. From many conversations with ranchers, I know that it is very possible to ranch with no or very little wolf related issues. Wolves cause less than 1% of cattle deaths which can be effectively managed with non-lethal methods. Friends of mine who are professional ranchers and cowboys say that any complaint about wolves is based on sloppy ranch practices. Why would we running our country on antiquated and uninformed practices and not use the science? Wildness and the wolf's part in it is so special and unique to America. This is why people visit our wild places from foreign lands. The wolf is valuable for ecotourism as well as the ecosystem.</p> <p>The wolf is an intelligent, family oriented animal that moderates it's reproduction based on prey populations. Because wolves mostly take the sick or old, they keep undulate populations healthy — as we now see in parts of the country where the wasting disease is a serious problem among deer and elk. We should all admire this animal and learn from it — consider it a "brother" as Native tribes traditional view it. America is not just a monoculture of cows; America is beautiful because of its wild-ness and the wolf defines and creates wild, healthy ecosystems.</p> <p>Thank you, Susan Strauss and Family 66280 White Rock Loop Bend, OR 97703</p>
Lynd	Rose	<p>Wolf (Harvest??) Advisory Committee,</p> <p>I would like to object to the whole idea of a fall wolf killing season. You already had your yearly wolf slaughter in February of 2021. You ignored the wishes of the people of Wisconsin and bowed down to special interests groups. Because of your reckless decisions in February no one knows how many ways it has affected the wolf packs.</p> <p>We do know pregnant females were allowed to be killed. We know that night hunting was allowed, when night hunting was not allowed in any other previous wolf hunts. We also know that depredations have gone up because family units were destroyed. If you would have followed the science you would have known this was going to happen. We also know that you allowed quotas to be disregarded. We also know that you did not consult the tribes.</p> <p>There should not be another wolf hunt in the fall. Of any kind. You have satisfied the sick legislation of this state by having a wolf slaughter in February 2021. The people of Wisconsin don't want another wolf hunt. When are you going to start listening to the majority of people, instead of small interest groups?</p> <p>Dogs should be banned from participating in a wolf hunt. By allowing the use of dogs to hunt wolves, Wisconsin is the only state to allow "state sanctioned dog fighting". This is the kind of thing Wisconsin is being known for. Cruel, sick animal abuse, to both the wolves and the dogs who are killed by the wolves. These are sick individuals who participate in this and the people who approve this kind of animal abuse.</p> <p>Wolves self regulate their population. There does not need to be any "set" number on the amount of wolves that can exist in our state. I live in the northern part of Lincoln County and have never seen or even heard a wolf howl. So, no, it is not true that there are "too many" wolves. I was hoping that one day I could see or hear a wolf, but you seem to only want to eradicate them from this state. Believe it or not, people come to Wisconsin to see wildlife and enjoy the north woods. If you would use your heads, you would realize that you could make more money by saving Wisconsin's wildlife and environment, then having all your killing sprees. Less people are hunting and that number will continue to drop. Start thinking about the people who enjoy the silent sports and enjoy seeing and hearing the wildlife that Wisconsin has to offer. The wolf is a big part of that picture.</p> <p>After the February slaughter, where night hunting was allowed, wolves were run to exhaustion by dogs and people on snowmobiles, pregnant females shot and total disregard of quotas, there should not be another wolf hunt this year. I have no respect for the Wisconsin DNR, the Natural Resource Board, or the last wolf advisory committee and I am not alone. I also have little hope for this new wolf advisory committee being much different from the last one. I would never report a wolf sighting. I have no trust in this organization from what they are letting happen in this state and especially in regards to the wolves in Wisconsin. This is not conservation. It has become a money making business. You profit off the killing of animals and you have your sights set on the wolf. Wolf advocates may have lost battles to you and your special interest groups that you pander to, but you will not win this war. We will continue to fight for the wolf's right to exist and we will expose what you are doing.</p> <p>NO FALL WOLF HUNT!!!!</p>
Diloreto	Kim	<p>Please, set a zero quota for the November wolf hunt.</p>

Giencke	Jill	<p>How wonderful to have an opportunity to speak as a tax-payer about the travesty we have let our state become regarding the hunting, (please note: not "harvesting". One harvests corn and beans, one kills animals), of Wisconsin's rapidly dwindling wolf population. After the blood bath that was the ill-conceived and atrociously executed hunt this year, which brought the eyes of the nation to our state for all the wrong reasons, yet again, it is absolutely ludicrous to even consider a hunt in November. Why? Well, because there is no reason for a such a trophy hunt, except to furnish trophies. Not a justification for such slaughter. Since our wolf hunting statue says a single hunt shall be held, but does not specify a quota, that quota must be zero for the foreseeable future, thanks to the massacre in February and the untold, long-lasting damage it has done.</p> <p>We have a management plan that is over 20 years old, hardly the best available science!</p> <p>And let's never forget--the vast majority of Wisconsin citizens do not participate in these blood sports, and yet our DNR consistently caters to the 2% or so of citizens that do. This is hardly democratic, where the majority rules.</p> <p>Wisconsin has been on a serious slide as far as coexisting with wildlife for decades now. We can begin to turn that around by setting this year's quota at zero.</p> <p>Let's act based on logic and reasoning, rather than simply trying to placate a tiny percentage of Wisconsinites.</p> <p>C'mon! We can do it! Zero quota.</p>
Ruge	Tommy	<p>Hello I heard that there's a virtual meeting this upcoming Tuesday about this year's wolf season. I'd like to state that we in fact do need an annual wolf hunt in Wisconsin. Just think you guys depend a lot on deer hunters in this state. Wolves do no good for the deer herd in the northern part of this state. The wolves eventually start hunting more south if they haven't already. I've seen tracks south of black river falls.</p> <p>Another point is that Wisconsin is trying to introduce ELK hunting to the residents. We need to have the ELK'S back and keep the predators at bay.</p> <p>Now I'm not saying we need to eradicate the wolves but simply maintain the wolf pack to a reasonable number.</p> <p>I'd love to be able to have the option to hunt ELK every year in this state. That can easily be made possible if we simply have an annual wolf hunt.</p>
Gregoire	David	<p>Dear Sirs,</p> <p>I'm writing to implore you to suspend consideration of a fall slaughter of Wisconsin Wolves. The debacle the state created recently when they allowed out of state hunters to pressure our DNR into a poorly organized and supervised slaughter of wolves is proof that more serious consideration needs to happen before the state allows further senseless killing of intelligent beings. Let science determine any killing of important predators, not the bloodlust of weekend warriors.</p>
Larsen	Inna	<p>To whom it may concern:</p> <p>Wolves are apex predators who are crucial to reducing the already overpopulated deer and by extension to control CWD and overgrazing. There is already compensation at taxpayer expense for livestock depredation. Hunting with dogs is basically animal abuse and opposed by the Humane Society of the US and these owners who place their dogs in harm's way are compensated by taxpayers. Science was not used to set up the Feb 2021 hunt, targeting breeding pairs, disrupting packs, thus creating more animals who could be a hazard to livestock. Just because the wolf was federally delisted, does not mean that Wisconsin has a license to drastically reduce its population. Court orders by out of state trophy hunters do not determine game management in Wisconsin, science does.</p> <p>Sincerely, Jeff and Inna Larsen UW Madison Conservation Biology BS 1983 Carleton College Biology BA 1988, Indiana University Animal Behavior MA 1992</p>
Tedrowe	Melissa	<p>Dear Wisconsin DNR:</p> <p>I'm writing to urge your agency to set a quota of "zero" for Wisconsin's proposed fall 2021 wolf hunt.</p> <p>Best, Melissa Tedrowe</p>
Fischer	Anthony	<p>I think the fall wolf season should be continued because the wolf numbers are getting out of control. I'm not saying they should be hunted to extinction but they definitely should be managed to a lower population number. I think the original dnr goals for recovery would be acceptable.</p>
Nirva	Anna	<p>Please set the quota for 0 for the wolf hunt. Our state is better than this. No other state in the US allows dogs to track and hunt wolves. This is nothing more than legalized dog fighting! What is wrong with our lawmakers????</p> <ul style="list-style-type: none"> • Nearly two-thirds (62%) of Wisconsin voters - across party affiliations, hunters, farmers and genders and geographic locations - oppose the trophy hunting and trapping of wolves. • The majority (68%) believe the February hunt killed excessive numbers of wolves. • Most (68%) voters are convinced that using steel-jawed, leghold traps or strangling neck snares on sentient wolves is intolerable and 66% oppose using packs of GPS radio-collared hounds to track and hunt wolves.
Zacher	Stacy	<p>DNR:</p> <p>Please set a quota for the November wolf hunt in WI at ZERO (0).</p> <p>There is no science-based reason or evidence that it is beneficial to have a wolf hunt or to trap wolves in this state.</p>
Dalton	Lindsey	<p>Dear Committee Members,</p> <p>I am an avid outdoors lover, and love all forms of outdoors recreation in our beautiful state. Please consider setting the fall 2021 wolf harvest quota at zero. With the events this spring, we still do not know the full impact of the spring hunt. There is no scientific basis for the recreational hunting and trapping of wolves.</p> <p>Secondly, while the wolf hunting statute does state that an annual hunt must be held, it does not specify that the quota must be non-zero.</p> <p>Finally, inhumane and un-sportsmanlike methods were used to hunt and trap wolves, including hounding (also a risk to the hounds' lives), and steel-jawed leg traps. I have heard from several hunters who are opposed to these methods, and say that the wolf hunt does not represent what most hunters think of as "sportsmanlike."</p> <p>Again, there is no scientific justification for the recreational hunting of wolves, and, as we saw this spring, a non-zero quota hunt will have an untold impact on the already devastated wolf population. Please don't repeat the mistakes of the past on a population that is only starting to rebound.</p> <p>Thank you, Lindsey Dalton Middleton, WI</p>
Emer	Patricia	<p>DNR: This is to request you set zero quota for the November wolf hunt.</p> <p>There is no science-based justification for the trophy hunting or recreational trapping of wolves.</p> <p>Thank you, Patricia Emer</p>
Canik	Michael	<p>Dear Sir,</p> <p>I have lived and hunted in Northern Wisconsin all of my life. We have always hunted for the sole purpose of gathering food and or what was needed to feed our families. I think the harvesting of wolves does not meet any any of that criteria. It is ridiculous to me to go out and shoot an animal just for the sake of shooting it and not harvesting it. If wolves are such a problem in Wisconsin and the northern parts of states, we should be trapping the adult males neutering them and putting them back out in the wild thus limiting reproduction. This would be a much more humane thing to do. Please, take this into serious consideration and not allow the reckless harvesting of animals especially wolves just for the sake of it. Thank you for your time. Michael Canik</p>

Markus	Vicki	<p>To Whom it May Concern;</p> <p>The slaughter that happened in February cannot be allowed to happen again. It was a huge black eye for the state of WI, a huge black eye for ethical hunting and only garnered more support to get the wolves relisted on the ESA!</p> <p>It truly was an abomination and made the WI DNR look horrific! Ethical hunting needs to prevail, not a mass slaughter. Fair chase needs to come back to hunting, not an anything goes slaughter!</p> <p>No dogs allowed. No fair chase here! That is nothing more than dog fighting which is illegal in this country.</p> <p>No night hunting! Where's the fair chase in night hunting? You don't allow it for deer, why should you allow it for wolves?</p> <p>No electronic calls! Again, fair chase? How about we release men and then record sounds of their wives or children being beaten and screaming and see how you like it?</p> <p>No traps! Trapping needs to be banned all over. It's an archaic, inhumane hobby and I'd love to see a trapper stick something in a trap and be stuck that way for however long until someone comes and takes a picture and hits them over the head with a club or strangles them. How would they like that? Not much I'm guessing.</p> <p>No baiting! Again, fair chase? I don't think so!</p> <p>If you're going to allow wolf killing, at least make it fair for the animals who you're killing. Make the supposed "hunters" actually have to get off their rears and track and hunt the old fashioned way! The way real men hunt!</p> <p>Regards, Vicki Markus</p>
Wilson	Jacquelyn	Wolves are more important than wolf trophies. WE MUST PROTECT THIS NOBLE AND NECESSARY SPECIES WHILE THERE IS STILL TIME TO PROTECT IT. Otherwise, they will all too quickly become extinct and it will be too late, for us and for them and for the world. Please, do your part to protect nature and its balance by banning wolf hunts!
V	Mary	Please don't kill wolves and disrupt their pack social layers again!
O'Brien	Maureen	I oppose more wolf killings in Wisconsin.
Hochtritt	Dave	The citizens of Wisconsin have long been led to believe that the WDNR's primary function was to protect and promote wildlife. In regard to the wolf it can only be classified as a "complete and total failure." Either because it cannot or will not take responsibility for the actions of 5% of the population who find killing an iconic animal like the wolf "sport." These trophy hunters and trappers deny that wildlife belongs to all of us and not to the few. The WDNR should be voice behind this philosophy. In effect do the job you were created for!
Shansky	Joanne	<p>We are strongly opposed to a Fall wolf hunt. The February wolf killings were a tragedy that brought shame to Wisconsin and seriously weakened the entire wolf population.</p> <p>In addition, it was carried out during breeding season and brutal means were used: dog packs, night hunting, snowmobiles, traps, etc. Mismanagement was pervasive. This is hunting? This is protecting our natural resources? No, this was simply and shamefully a killing frenzy.</p> <p>Please study and use science to determine how best to achieve and protect a healthy population of wolves in Wisconsin. And please don't give in to those who simply want to kill for the feel of it.</p> <p>Thank you, Frank and Joanne Shansky 4110 S. Lake Dr. #247 St. Francis WI 53235</p>
n/a	Rebecca	<p>Using dogs and snowmobiles.</p> <p>24 hour days of no let-up 'hunting'.</p> <p>Occurring during the breeding season & while snow on the ground to make it even simpler for these so-called sportsmen/women.</p> <p>A disgrace. Blatant disregard for Native Americans's LAWFUL imput. What a farce. NEVER ALLOW THIS TRAVESTY AGAIN</p>
Sheggeby	Stan	Apex predators are essential to healthy ecosystems. For example, wolves help us control CWD among deer populations.
n/a	Mary	This must stop NOW! There should be no fall hunt as there is no reason for it.
Lafouge	Ellen	<p>Wisconsin held a February wolf hunt. It wasn't a hunt, it was a slaughter. It was a national disgrace reported far and wide across this country for its rushed, wanton and out of control massacre of our wolves.</p> <p>The February hunt took place during breeding season; some killed were pregnant. Some of the surviving pregnant wolves gave birth in a den without the aid of the pack members to bring them food. It is anticipated that many surviving pups will die, denying hunters the thrill of killing them by dog, trap or gun.</p> <p>That the Wisconsin DNR is making plans for a November 2021 wolf hunting/trapping season is unfathomable after the "harvest" exceeded allowable numbers by as much as 80 percent, perhaps more when unreported killings are taken into account.</p> <p>I would like to be proved wrong, but if the February 2021 hunt is any indication, it is clear the Wisconsin DNR is not up to the task of protecting and managing our wolf populations. The WI DNR has deeply tarnished its reputation by becoming beholden to the sway of trophy hunters and anti-science/anti-environment politicians, even when an overwhelming percentage of Wisconsinites, when polled, do not support killing wolves at all.</p> <p>The sad facts and results of the February 2021 Wisconsin wolf hunt should give pause and reflection to those in the DNR who share responsibility for it, and who have the ability to make sure it does not happen again. There should be no Fall 2021 wolf hunt. Period. Two wolf slaughters in one year would be beyond horrific.</p> <p>Sincerely, Dr. Jean-Pierre Lafouge Ellen Lafouge Bayside, Wisconsin</p>
Wichman	Patricia	<p>I want to use my voice to protect the wolves and wildlife who need us most:</p> <p>Hunting practices that will have negative impacts on the long-term health of the wolf population must be prohibited. The precautionary principle must be exercised when setting a quota to prevent more harm to the wolf population. Critical data is missing on pack disruption, pup survival, number of illegal kills and number of wolves killed but not recovered. A quota must take into account the impact of the breeding season hunt on the wolf population.</p> <p>Thanks for listening and considering my petition.</p>
Marquardt	Chris	We are trying to save this earth and the living creatures on it. What you are doing is destroying this earth for the benefit of a few. Your organization is suppose to be about protecting wildlife. DO YOUR JOB
N/a	Dave	Stop this garbage right now. There is no good reason for this so called hunt. Wolf are vital to our system and need protection not death.
Hendrix	Linda	<p>We have a cabin just outside of the Chequamegon forest and we camp in the beautiful small campgrounds there. We know first hand about hounding from those experiences. Before the 2012-2015 wolf hunts we would hear wolves howling nightly at our cabin. We have not heard them for a number of years now. An experience that we once looked so forward to is now gone. This last wolf hunt over 50 wolves were killed in our zone. This is heartbreaking to us. We are considering selling our cabin due to this hounding pressure in that area and I am beyond angry.</p> <p>There is merely a .02% DNA variance between wolves and hounds. Hounding wolves equates to dog fighting in the woods. This needs to stop. It is also becoming documented fact that hunting wolves leads to more depredation not less as the surviving pack members struggle to survive. In fact, greater depredation has been happening since the February hunt.</p> <p>The February wolf hunt has put a huge stain on Wisconsin. Tourism will suffer if another hunt happens in November. According to the latest HSUS Remington survey, 2/3s of Wisconsin voters are against the wolf hunt and 68 % of the population is against hounding our wildlife on our public lands. Seems to me that our legislators, the NRB and the DNR have no interest in listening to the real voices of the people. This also needs to stop.</p> <p>The time is now to stop letting the small percentage of trophy hunters, hounders and trappers..from within or outside of our state decide how our wildlife is managed. It is our duty and obligation...AND YOURS AS WELL...that wolves and wildlife exist and flourish for future generations to come. Because of the huge overage of wolves killed during the last wolf hunt, I recommend a quota of zero for a November Wolf Hunt. Going forward, tribes must be consulted, science used and strong consideration given to nonconsumptive , nonhunters who prefer a peaceful, coexistent experience on our public lands. Linda Hendrix, 1418 144th Street., New Richmond WI. 54017.</p>

Olson-Streed	Heidi	<p>As the sixth generation of my family to live in Wisconsin, the importance of our natural landscape and appreciation of the complex diversity of wildlife is not lost on me. Spending large amounts of time outdoors simply exploring and enjoying nature is a tradition that has been handed down through all those generations, the last three generations of which have not been hunters of any sort. My opinion on this topic should carry infinitely more weight than anyone from another state who just wants to come here to drink beers and shoot wolves. I am opposed to any further wolf hunts. The February 2021 wolf hunt filled me with utter disgust for a wide variety of reasons:</p> <ol style="list-style-type: none"> 1. I understand the DNR receives 90% of it's funding from hunting/fishing licenses. According to your own internal reports there is a steady decline in the number of recreational hunters. Relying mostly on funds from hunting to support the mission of DNR, not only works against your own mission statement but is just a bad idea in general as fewer people engage in that activity. 2. You should not be surprised to know that the majority of people who enjoy Wisconsin's natural wonders AREN'T hunting. If you used some creative thinking, you could probably even figure out a way to generate revenue and support from that very huge number of people, instead of relying on the tiny percent of the population who defines themselves as "hunters". It is incredibly easy math to see that if 10% of people identify as hunters - that leaves 90% of people who don't. Why do you do so much to cater to that 10% when you could be raking in the big bucks (all puns intended) by actually serving the VAST MAJORITY? 3. The determination of your "quota" (a word I use loosely since the 2021 hunt went over the "quota" by scores) and timing of the February hunt did nothing to ensure a sustainable population of wolves would be maintained - HOW DO YOU THINK YOU WILL KEEP HAVING REVENUE GENERATING HUNTS IF YOU JUST LET ALL THE WOLVES BE KILLED IN THE FIRST FEW? Seriously, I shouldn't have to explain that if you want to have wolf hunts, there has to be a population of wolves. 4. Do you even know the biological impacts of holding a hunt during breeding season? Obviously not, since you went and held a hunt that exceeded the "quota" during breeding season. Disgusting - if you managed the deer population in this way, there would be no deer in a few years <p>I strongly urge you to reconsider whatever plans you have for any future hunts until you get legitimate scientific data on the impacts, manage the hunts in a way that fits in with your own mission statement, and switch your focus to preserving lands and wildlife for the vast majority of non-hunters who have the capacity to enjoy nature without shooting anything - or drunk driving their ATVs everywhere and getting their dogs killed.</p> <p>Guess what? You can still literally have wolf hunts in a year, or two years or whatever, after you've gotten enough data to make decisions that are in the best interests of the wolves and the vast majority of WI citizens who have the mental capacity to somehow enjoy nature without shooting anything.</p> <p>Thank you for your time.</p> <p>Heidi Olson-Streed</p>
Oconnell	Randy	<p>Dear Gentlemen and Ladies,</p> <p>Per the Public Trust Doctrine, wolves in our state belong to us all, not a politically well-connected fringe group who have been granted sway over everyone else.</p> <p>Consequently, what has been allowed to occur is state-sanctioned dog fighting, illegal in all other forms.</p> <p>The use of baiting, trapping, and hounds to hunt and kill wolves is immoral, as is anyone who would support or participate in this barbaric form of "hunting", while also collecting compensation for loss of hound while knowingly placing them in harms way.</p> <p>No fall assault on our wolves !</p>
Shahbazi	Shahbaz	<p>I am writing to request that you set the Wolf harvest quota for this year at zero (0). I was appalled last year when in the span of 60 hours 216 wolves were slaughtered. I am writing also to ask you to uphold the stated mission of the WI DNR for ALL Wisconsinites.</p> <p>It is incomprehensible to me that despite the fact that there has to date been inadequate analysis of the effects of that outrageous slaughter on the wolves that yet live in the state, there should be any hunt of wolves this Autumn at all. It is incomprehensible, because the lack of that analysis means there can be no scientifically sound way to set a quota for this Autumn. This lack of commitment to science in the management of wolves violates the mission statement of the DNR of Wisconsin and so violates the public trust.</p> <p>This second matter I raise is equally important; the decision-making around the February hunt was itself, not transparent and sacrificed the actual will and interest of the majority of Wisconsin's citizens in favor of the narrow and ideologically-driven interest of trophy hunters, gun enthusiasts and out-of-state trophy hunting organizations. The great majority of all those who spoke, commented, called and wrote regarding the wolf hunt were strongly opposed to the hunt, including tribal members from the state. This undemocratic bias towards a small interest group further undermines the mission of the DNR and its management of wildlife on behalf of all of us who live in Wisconsin. As you may well be aware, most citizens now are not hunters and certainly not hunters of predators we cannot eat. Rather, most of us cherish the wild places in Wisconsin that yet remain because we seek to experience the beauty and mystery and power of nature and take enormous joy and solace from our encounters with all of the wild species that make up the fabric of life we ourselves once knew more intimately.</p> <p>I urge you to recommit to the mission of protecting and preserving the wolf in our state and cease to allow the lawless slaughter of them (by means that are unethical and unique to the shame of this state--such as night hunting, hound hunting and driving wolves to exhaustion only to kill them) and to recommit to a science-based stewardship of their presence here. Finally, I urge that the decision making around this hunt be based on thorough analysis of the last wolf hunt and a respectful recognition of the will of tribal leaders, scientists, conservationists and the majority of Wisconsin's citizens.</p> <p>I again implore you to set the quota at zero. Our citizens deserve a transparent and data-driven decision on an issue of such importance. I hope you act with the consideration of all the communication you receive in regards to this issue.</p>
Becka	Veronique	<p>Dear board members,</p> <p>I do not support a fall wolf season. Our ecosystem needs wolves to remain vibrant. Wolves keep the deer population healthy by taking the weak and sick deer.</p> <p>Please respect our wildlife. It is not yours to take.</p>
Chier	Louise	<p>Twice as many wolves should have been killed during the last hunt. I have 20 game cameras out in Oneida County on bear baits and there are multiple wolves on every camera in a 20 mile radius. Keep the politics out of the hunt. I have lost three of my best dogs to the wolves. Enough is enough. We can't even take a walk down the road without seeing one or signs of them. Let's fix this problem!</p>
Randolph	Patricia	<p>After 25 years researching the DNR and the plight of wildlife in Wisconsin set into the context of a million species going extinct now (half of the human-identified non-human life of this planet), it is obvious that the DNR, Natural Resources Board and legislature need dramatic reforms to meet the challenges of this time.</p> <p>When I was elected the first anti/non-hunter in 1999 (65 years after its inception) on the so-called Conservation Congress hunting lobby (which it remains to this day), it opened my eyes to the imbalance of power and the imbalance pushed on nature by hunting and trapping natural predators to produce an inflated deer herd and turkey targets for hunter satisfaction. When I took on writing the Madravenspeak living wildlife column for The Capital Times, that nine years of research highlighted the fragility of our wildlife and the forces of state and federal agencies working constantly to kill them.</p> <p>Wisconsin has 1.8 million deer reduced to 1.3 million after the annual four and a half month deer kill. The 900 wolves in the state take on average 20 deer annually each - or 18,000. They take them for food. Trophy hunters kill about 400,000 - 600,000 deer annually. They kill them for fun.</p> <p>Are humans the only species allowed to eat on planet earth? If so, we will have a very lonely and sick demise as we destroy the last of our web of life. Right now 60% of mammals on earth are livestock for slaughterhouse deaths (for human predation), 36% of mammals on earth are humans and only 4% are all the wild mammals left - under constant attack and stress.</p> <p>Expect more pandemics as we gut the natural world of life that weaves together a sustenance and some sanity for all life, including humans. Even the Vatican met in February 2017 to declare human-caused biodiversity destruction co-equal to human-caused climate chaos as a THREAT TO HUMAN SURVIVAL.</p> <p>Wisconsin is epidemic with lyme disease due to the mismanagement of predators - year-round coyote killing, killing contests, this irrational obsession with killing and poaching wolves, and trapping indiscriminately 7 months of the year. With deer and mice the main carriers of the lyme ticks, the Natural Resource Board focus on killing, rather than saving - on imbalance rather than balance for its "boys" to continue to support this killing business. Lyme disease is a pricey plague for humans and their pets. Veterinarians in Wisconsin report lyme disease in dogs as a major impetus for vet visits.</p> <p>According to DATCP, wolves may be responsible for 2/10ths of ONE percent of the reason that livestock die before the slaughterhouse for human consumption. Poor husbandry is 90% - why not focus on that?</p> <p>With only ten Mexican wolves left in the wild, after poaching and rancher killings destroyed that saving a species effort - our state DNR primarily has forever been in the stranglehold of one special interest, hunters, trappers and now hounders of our wildlife. The 90% of us who do not kill have been excluded by structuring the DNR to be funded primarily on killing licenses. Staffed by killing apologist biologists. Run by hunters and trappers on deciding boards and organizations. But you know all of this - and I am sure your eyes glaze over when scientists call for an end to the war on our last wildlife - when scientists point out the trophic cascade benefits of wolves in natural numbers - because they are self-regulating. Being a wolf is not easy in this world. Family is everything to them. They suffer just as any mammal suffers. They die just like we do - but with shorter lifespans. They are ESSENTIAL and should be HONORED for their contribution to the great mystery of life we are all born into. Hunters fear emotion but are the most emotional of creatures. They are adrenaline rush and violence and calculated over-armed overkill in this fragile world that is being destroyed under our feet.</p> <p>We the people demand that our wolves be honored and protected in Wisconsin. We reverently call for you to adhere to science, adhere to decency and the moral imperative to protect our wildlife as the mission statement of the DNR states. We demand balance and RESTORATION of our fragile and attacked and destroyed natural systems, forests, wetlands and wildlife.</p> <p>The agency needs to make a dramatic shift to saving and restoring the balance of nature and the intricate interdependence of wildlife that we only imperfectly understand and are destroying rapidly. When it is 4% wild mammals still existing on this planet - do you kill it down to 1% - 1/2 % - NOTHING and then wonder what happened? Like what happened to quail, is happening to grouse, and now to wolves?</p> <p>Wisconsin is the only state that has slipped in a law requiring a wolf hunt as soon as the endangered species was de-listed by a corrupt and criminal poser on his way out the door of the White House.</p> <p>Decades of effort and millions of dollars spent to restore a vital species extinguished in ignorance and irrational hatred, a wolf license plate promoted to save the wolf - then a killing license collected to kill the wolf - what bunk!</p> <p>The Wisconsin DNR has been entrusted with a higher mission - to protect our wildlife, trees, wetlands, and nature for ALL citizens. You are failing that mission and we hold you to your mission.</p>

Gaalaas	Linda	<p>I am devastated to hear that ANOTHER fall wolf hunt is proposed which could literally kill off the limited number of wolves already low in Wisconsin. The February wolf hunt killed 200!!! wolves in 3 days, which was more than the limit required in the law. And just to allow hunters to be proud of their shooting skills? Wolves are an important part of the eco system in Wisconsin, killing rodents and the over-population of deer. Across party affiliations, hunters, farmers, genders and geographic regions in the state OPPOSE hunting and trapping wolves. The majority agreed that the February hunt killed excessive numbers of wolves. They also are convinced of the inhumane steel-jawed leghold traps and strangling neck snares that were used for this hunt, as well as the use of GPS radio-collared hounds to track and hunt wolves.</p> <p>I am asking for a zero quota for hunting wolves this fall. There is no science-based justification for trophy hunting or recreational trapping of wolves. The February hunt occurred during the breeding season and pregnant females were killed along with the males. Wisconsin's wolf hunting statute states a SINGLE annual hunt should be held without a designated quota. As the February wolf hunt was overwhelmingly devastating to the wolf herd, there is NO need for a 2nd November hunt. A quota of ZERO should be set and established at this time.</p> <p>Please send me a response following the June 22, 2021 Wolf Harvest Advisory Committee Meeting.</p> <p>Linda</p>
Schrank	Rosaida	<p>To whom it may concern: Please set the wolf quota to 0 this November. Last years "hunt" was excessive enough already for the wolf population here in WI.</p>
Leonard	Ray	<p>1.The Fall 2021 Wolf Harvest should be ultra-conservative, given that the impacts of the 2021 late-winter harvest are not well-understood - due to the loss of an unknown number of breeding wolves. Calculate the "normal" harvest quota based on the estimated 2020-2021 winter population and then reduce it by half in order to compensate for the unknown additive mortality that resulted from the late winter offtake.</p> <p>2.Wolf Management Zones 1, 2, and 5 should be established as Wolf Conservation Zones, with annual offtake due to all sources (estimated natural mortality, estimated illegal kills, known road kills and lethal depredation treatments) not to exceed 25% annually. Wolf Management Zones 3, 4, and 6 should be treated as marginal or unsuitable habitat, with aggressive harvest objectives and enhanced focus on depredation control.</p> <p>3.DNR has been directed by the NRB to look into aligning wolf harvests in WMZ 5 with the proposed expansion of the Central Forest elk herd boundaries - ostensibly to manage wolves more aggressively in order to facilitate growth of the elk herd. However there has been almost no predation on elk since the beginning of the project - more elk have died on the highways and by hunters' mistakes than have been taken by wolves. There is no need to consider a more aggressive wolf management tactic in this region, and it should be treated as in #2 above, as a Wolf Conservation Zone.</p>
Schrank	Kristin	<p>Hello-</p> <p>I respectfully request that you set a quota of 0 for the November wolf harvest. Given the grave results of the February wolf harvest, it is clear that rules will be broken and quotas disregarded. Wisconsin's wolf population has already suffered a substantial blow this year as a result of the over harvesting that took place. As an integral species in the maintenance of healthy ecosystems, we need to protect them. I fear that Wisconsin's wolves, a species that was nearly decimated by bounties in the 19th and 20th Centuries and has very slowly been recovering under the protections provided by the Endangered Species Act, cannot sustain another harvest that involves the killing of any individual wolf. I ask that you take these thoughts into consideration and please set a quota of 0 for the November wolf harvest.</p> <p>Thank you, Kristin</p>
Bergel	Amanda	<p>I am writing to you to encourage a zero quota for the fall wolf hunt. Scientific facts are lacking to show cause for a hunt, along with under reported data of excess kills by poachers, hunters, and others. The poll conducted by Remington Research Group indicated a majority public opinion is against trophy hunting of wolves. I also oppose the use of dogs and steel traps/snares to hunt these animals. If we are to be a civilized people, then we should use civilized population control measures.</p>
Ribbens	Eilene	<p>We respectfully request the Wisconsin DNR use its authority to set a Zero Quota for the Fall Wolf Hunt.</p> <p>The February Wolf Hunt was a slaughter that shocked humane-minded citizens not only in Wisconsin but across the nation. Should this committee decide that a wolf hunt will take place in the Fall of 2021, you are doing so against the will of the vast majority of people of the State of Wisconsin.</p> <p>As the committee deliberates on this matter, and if a quota greater than ZERO is authorized by the Wisconsin DNR, please consider:</p> <ul style="list-style-type: none"> •Current wolf hunting activities should not be dictated by a very small minority of Wisconsin citizens when the vast majority object. •Wolves are a natural resource that "belong" to ALL Wisconsin residents NOT the tiny minority of those who want to kill them. •Wolves are not eaten by hunters, therefore the hunt is only "thrill kill" for trophies. •The impact of the rushed February hunt has yet to be determined. No further killing of wolves should be permitted until that impact is studied. •Report times were manipulated by hunters to increase the number of wolves killed. No place in Wisconsin is more than an hour from cell phone coverage and therefore there is no reason why kills should not be confirmed within a four hours or less. •DNR officials claim that it is illegal for hunters to allow hounds to directly engage with wolves, yet the internet is full of videos and photos confirming that that is precisely what is happening. •DNR officials also claim that it is illegal for hunters to pursue wolves with ATVs and snowmobiles—chasing the wolves to exhaustion—yet the internet is full of videos of the hunters doing that. •Collared wolves are obvious part of a study. They represent an investment of time and money on the part of researchers. The taking of collared wolves should be strictly prohibited. •Previous Wisconsin DNR Wolf Management Plans contained effective measures for "controlling nuisance wolves and reimbursing landowners for losses caused by wolves" without the use of hunting. •Hunting wolves with hounds is just a form of "legalized dog fighting" that appears to be in direct conflict with Wisconsin State Statute 951.08 Instigating flights between animals. •Traps, snares, cable ties, and packs of hunting hounds create conflicts and pose dangers to other users of public lands, to private property owners and to their pets. •Hunting hours must be limited to decrease negative impact on property owners, wild and domestic and farm animals •"Fair chase" hunting ethics must be reinstalled in Wisconsin wolf hunters and enforced by the Department of Natural Resources. •As this activity is not popular with the general public and hunters are not following the rules in place, it is incumbent upon the DNR to put more "boots on the ground" to monitor hunting activities. •A minimum five mile NO HUNT buffer zone should be created around tribal lands, camping sites, hiking trails and other places used for silent sports to provide for the safety of both the tribal wolves and the general public and their pets. <p>We appreciate this opportunity to provide input and hope that the vast numbers of organizations and private citizens are heard on this matter. We cannot and should not be forced to witness a repeat of the slaughter that occurred last February. While a very few people enjoyed "the kill" everyone else was appalled. This is not the way to manage Wisconsin's precious natural resources nor maintain its reputation in the state, the nation, and the world.</p> <p>Sincerely, Eilene Ribbens – Legislative Liaison Wisconsin Federated Humane Societies, Inc 5132 Voges Road Madison, WI 53718 Egress@charter.net</p>
Vinet	Claire	<p>Please don't allow morally degenerate, blood thirsty killers to "harvest" the wolves.</p>
Beheler	Kerry	<p>Hello all. Please include my personal letter to the Wisconsin Department of Natural Resource regarding the Wisconsin fall wolf hunt 2021 in your packet of public comments and information on this subject. These are personal comments for the Wolf Harvest Committee meeting scheduled for 22 June 2021. I am sending this letter to the WDNR Large Carnivore Specialist Randy Johnson, to the DNR Legislative Specialist Scott Karel, and to my local state Senator Jon Erpenbach and Representative Sondy Pope, and to the Natural Resources Board Liason Laurie Ross. Please contact me if you need any more information. Thank you. Kerry Beheler Mount Horeb WI</p>
Roberts	Susan	<p>We oppose moving forward with a fall wolf hunt. Set a zero quota. We do not even know what the effect of the rushed, non-scientific over-quota February hunt was, and now we are talking about killing more, in the same year? No. How many pregnant females were taken and what did that do to the population? We don't know. Wildlife is supposed to be held in the public trust, for all of us, yet it feels like these hunts are being scheduled only for a small minority of the population. Reducing wolves will limit our opportunities to see them in the wild while recreating in Wisconsin. There will be fewer wolves to help us control CWD. A second hunt will cause MORE conflicts with livestock, as packs disintegrate. No second hunt this year.</p>

Roberts (2)	Susan	<p>2021 Spring/Fall Wolf Management Comments for Wolf Harvest committee.</p> <p>By: Susan Roberts</p> <p>Date: 6/18/21 My background, education and experience is in the Life Sciences including medical and environmental sciences for over 20 years. I love the outdoors, wildlife and was raised to protect and preserve it. My family spent over 30 years managing an organization to build and restore wetlands and manage wildlife.</p> <p>The DNR and NRB currently only represent specific interests of select groups regarding wildlife such as hunters and sportsmen. It's time to step up and make decisions for all. I enjoy seeing wildlife specifically in their natural habitat. Sadly we are making their natural habitat a living hell. Given the mass kill that happened in Feb there are no safe places for them to live or for me to see them. Making decisions only in our state regarding specific groups is non-inclusive and does not represent our diverse population including non-consumptive users.</p> <p>Having spent relevant time around people who fish and hunt I know that when licenses and quotas are unveiled, a significant number of hunters engage in trophy hunting and often ignore regulations setup by the state NRB/DNR in regarding size, sex, quota, etc. Specific details are often ignored because hunters know the chances of getting caught are slim to none. They know the DNR cannot patrol every lake forest or field. That has proven (along with the NRB/DNR to not immediately be able to call off a hunt) to cause NRB/DNR hunting limits to be over quota as we have seen in this recent Feb 2021 hunt and in almost every hunt destroying more than the NRB/DNR limits of wildlife. Having no control of this is not "wildlife management". It is a faulty system that is not scientific or accomplishing its goal.</p> <p>In addition trophy hunting/aggressive hunting behavior decimates wildlife populations such as taking healthy individuals instead of sick animals that predators would take (proven by studies done in Colorado with Cougars choosing infected prey animals over healthy ones).</p> <p>Dogs and wolves have a far greater surface area of olfactory cells than do cats (125 cells per square centimeter for dogs/wolves compared to 13.9 for cats). The cats however have twice as great a density of receptors but dogs/wolves still have twice as many receptors overall making a dogs/wolves sense of smell far more acute (approximately twice as good). These studies and facts scientifically show that apex predators choose unhealthy animals and improve overall welfare of the population. Hunters taking healthy animals and destruction of the apex predators has proven to have a harmful impact on our wildlife population and we end up with flourishing diseases like the CWD we have today. In addition pathogenic prions (like those from CWD left by infected wildlife, etc.) are believed to initiate a variety of neurodegenerative human health conditions such as Parkinsons and Alzheimers. Continuation of the current protocol is toxic to human health and to wildlife. This is a plan that is not working on many levels.</p> <p>The NRB/DNR Wolf Harvest Committee needs to end the Fall 2021 wolf hunt with a zero quota immediately and development a wildlife management plan that is transparent, health focused, and sustainable. This redeveloped plan will allow all of the wildlife in Wisconsin to flourish and be managed naturally, humanely and scientifically so that as Preston Cole stated in one of the DNR calls this new plan makes Wisconsin a safe "landing destination" for all to enjoy wildlife in our beautiful state.</p>
Devoe	Zach	<p>I wanted to submit a comment on the harvest quota for this fall. I see I'm too late for that. But wanted to drop you an email. Firstly I would like to state I'm pro wolf. I believe they belong here. I just want them managed at acceptable levels. I live in Douglas county which I believe is the wolf capital of the state based on the DNR's pack maps. I have around 30 trail cameras spread around the county and they are located within at least 4 different pack ranges. I did have pictures of other wolves on the fringes of these areas that could have been from different packs but I'm not counting them just to be reasonable from a statistical standpoint. I had 15 different wolf pups on camera last summer (one pack had 7 pups and 2 others had 4 each). I never had pup pictures from the 4th pack which happens to be around my house. Each of those 4 packs has at least 4 adults that I know about and include at least 2 different collared animals. Because I cover just a small portion of one county and had over 30 individual wolves on camera over the course of 2020 I believe the states population estimate is grossly underestimated. I do find it difficult to believe I was able to capture 3% of the total estimated 2020 wolf population on camera just between 4 packs. Just wanted to give you some information from way up north here.</p>
Villis	Kelly	<p>Yesterday I submitted comments for the upcoming meeting. Since then I was fortunate to catch a talk by Professor Tim Van Deelen that was on Virtual Badger Talk and was called "Impacts of Wolf Predation on Wisconsin's Deer Herd." His talk was excellent and I encourage all of you to watch it before making any further decisions about wolves. It is very enlightening.</p> <p>"Tim Van Deelen will review a bit of the history of this topic, its scientific context, and will review recent telemetry research and recent population modeling that attempt to quantify the effects of wolves on Wisconsin deer populations relative to the impacts of hunting and the impacts of other predators."</p> <p>The take away from this was that wolves and black bear have a minimal impact on deer populations in WI, that depredation on livestock in WI is a manageable issue, wolves help reduce deer-auto collisions, help with plant diversity, there are not less deer to hunt, the deer have moved to less core wolf areas, that humans hunting and chronic wasting disease have the largest negative impact on the deer population, that wolves change the behavior of the deer and not significantly the quantity, 24-32% of WI wolf packs lost reproduction due to the Feb. 2021 massacre, and that the goal should not be a "number" or "quota" but instead, sustainability of the wolf population which they will do all by themselves. Wolves will only produce as many young as the environment can sustain. The goal needs to be sustainability, human tolerance, and managing any negative effects (non-lethal forms of deterring wolves from livestock). These are my new additional recommendations to your committee.</p> <p>https://www.facebook.com/markesanlibrary</p> <p>The wolf population will manage itself.</p> <p>No target quota, just manage effects instead of managing population.</p> <p>Get CWD under control.</p> <p>Coexist.</p>
Klein	Gloriann	<p>Previous comments have been submitted to the WDNR and NRB that can be referenced in the context of having a required WI wolf hunt despite overwhelming public objection to how the wolf hunt & quppotas have been mishandled & ill-advised thus far due to a legal injunction forced upon the WDNR.</p> <p>So will the WDNR make significant changes or reevaluate a fall hunt based on input from this committee? Following are some key points that need to be considered:</p> <ol style="list-style-type: none"> 1. The Feb 2021 wolf hunt exceeded the quota by 86% and the ramifications on its impacts on wolf breeding season will not be fully realized for some time thereby calling into question the need for a fall hunt. 2. The quota should be to manage wolves, not decrease the population to a 20 year outdated number. It must be based on scientific data by wolf and wildlife biologists, not special lobbying interest groups. Given that the WDNR has refused to gather vital necessary data from carcasses from the Feb hunt, any future hunts must incorporate the necessary sampling for future wolf population monitoring. 3. The wolf hunt is a management tool for depredating wolves, not a blind trophy hunt. Wolves are known to teach their pups how to behave and hunt. Creating voids in territory, splitting packs and taking out experienced wolves will invite more problems. 4. There is a serious discrepancy in the population occupancy modeling data results that differs from the ground tracking actual count that must be addressed prior to any future hunt. This discrepancy is skewing the population numbers and potentially misrepresenting the actual wolf population numbers. 5. WI Native American Tribes in the ceded territories must be included and participate in all planning phases as accorded by legal and legislative statutes. Overriding their "use" quota is a flagrant violation of treaty rights. <p>Setting a quota for the fall should follow the science, not well known misnomers and misconceptions. Proceeding with a fall harvest with a 20 yr old outdated 1999 wolf management plan that is still not updated and published with current data is premature and inviting more political problems and possible legal action.</p> <p>We have learned much about the ability of wolves to adapt to a changing landscape. Any wolf harvest must factor in current scientific data and consult with wolf and wildlife biologists on the impacts in which altering the population numbers of one species will have on the entire ecosystem.</p> <p>Perhaps it's time to reevaluate wolves not just as a species to harvest - instead recognize how they serve a multitude of roles in an evolving landscape - recreational, environmental, ecotourism, and outdoor enthusiasts to all Wisconsinites not just a select partial few.</p> <p>Without knowing the actual current wolf population numbers, scientific data and seeing an updated wolf management plan - how can a specific quota recommendation be decided upon? Until the necessary scientific data is provided any quota numbers are without merit and mere guess-work.</p> <p>Update the WI Wolf Management Plan and consult with the wolf experts before implementing a Fall hunt.</p>
Rausch	Jon Dale	<p>Good morning, hope all is well. Just giving my 2 cents on wolf season. Land owner and avid outdoorsman I think population is out of control and needs significant reduction. Thank you.</p> <p>Hi Randy, just a couple comments from a 86 year old grouse hunter who has hunted the wily bird for 63 of those years. I love to see the timber wolf in northern Wisconsin and hope that their population continues forever. But, having said that I feel that the population of wolves has increased dramatically in the last 10 years to a point now where the population of the wolf is much to high for the habitat. The wolf now is turning more to domestic livestock, hunting dogs like mine, deer, and anything else they can eat, including someday soon even us humans as they do in Europe. It is my humble opinion that the population of the timber wolf in Wisconsin should be maintained at around 200-300. I have no evidence that the wolf has any impact on the ruffed grouse population so assume it has none, but I can assure you that since they have increased to the point where we see them often I do take steps to protect myself, my hunting companion and my dog from the remote possibility that they might attack and hope to God they never do. I feel the same way about mountain lion and bear, of course and hope they continue in Wisconsin forever. Manage the wolf the way you do the black bear and all will be good. Maybe we will have to do the same with the mountain lion if we see more of them re-appearing and - hopefully the moose also will come back. Good luck, I love the wolf as I do the grouse we need them both forever.</p>

Herning	Scott	<p>To whom it concerns. Below are my comments regarding fall wolf season. Submitted by Scott Herning, 1529 Logan Ave. Marinette, WI.</p> <ol style="list-style-type: none"> 1. The February 2021 Wisconsin wolf hunt violated public doctrine. The integrity and professionalism of the Wisconsin Department of Natural Resources and the Natural Resources Board was greatly compromised. This shall be seriously considered in any future decision making. The public trust doctrine is rooted in ancient Roman law and the Wisconsin Constitution. It places a duty on the state to hold environmental resources in trust for the benefit of the public. 2. Wolves are sacred animals to all tribal peoples myself included (Menominee). The power of the wolf brings forth instinct, intelligence, appetite for freedom, and awareness of the importance of social connections. This animal also symbolizes fear of being threatened and lack of trust. Wolves are a powerful symbol of wilderness. Hunting wolves during breeding season, at night and with dogs and snares is seen as highly disrespectful, wasteful and criminal. Enabling this type of hunting exacerbates violence in our communities. 3. Wolves are a keystone species, protecting ecosystem health and balance. Having predators on the landscape—wolves, bears, mountain lions and coyotes—also provides a protective gauntlet that can help slow the spread and prevalence of deadly diseases. 4. Disrupting social structures in wolf families, aggressive human hunting of wolves results in increased conflict with farmers, and more wolf depredations on livestock. Wolf depredations are occurring now in Wisconsin after the February 2021 wolf hunt at an increased rate. https://dnrx.wisconsin.gov/wdacc/public/depredation/2021 5. The WDNR receives the majority of funding from the sale of hunting and fishing licenses. This is a conflict of interest and shall be further considered in regards to decision making. 6. Wolves save human lives. According to a recent study by a natural resources economist at the University of Madison, deer vehicle collisions go down 24% once wolves colonize a county. https://nypost.com/2021/05/25/wolves-scare-deer-and-reduce-auto-collisions-study-says/ 7. To ensure transparency and integrity of character, all WDNR scientific findings in regards to wolf seasons, et al. should be peer reviewed by an independent, third party science advisory committee.
Menter	Sue	<p>We are overrun with Whitetail Deer in Burnett County and have commonly seen 47 deer cross our driveway in a day. They are starving and eat all our plants, ignoring the deer repellent. There are many deer ticks here, too, and many residents with Lyme's disease. Last year, I contracted Lyme's disease from an infected deer tick in my yard.</p> <p>IN 2018, the WI Dept. of Health Services reported an estimated 3,100 cases of Lyme's Disease. However, many cases are not reported to the CDC, so the number is likely much higher. In addition, per the article below, the number of Lyme's Disease in WI has doubled in the past 10 years. Many WI deer are sick with CWD, and it is getting worse. A WI DNR biologist told us there is no plan for combatting CWD in the wild deer. A deer farm was recently found to have CWD right here in Burnett County.</p> <p>Throughout history, zoonotic diseases have caused pandemics and plagues, when disease jumps species from animals to humans. After the past year of the Covid-19 Pandemic, experts believe that pandemics will become more common in the future. Over 75% of emerging infectious diseases are zoonotic. (Taylor, et al., 2001). Can CWD jump from animals to humans someday? Do we leave CWD unchecked in the WI wild deer population? Are all deer hunters testing the venison before consuming it? As noted from the NYT article below, WI is named as a hotspot for CWD in wild deer. Scientists believe that wolves can help reduce CWD, in the wild deer populations.</p> <p>The overpopulated deer are a traffic hazard, too. Driving to town, we see groups of deer on the roadways most of the time. WI has had 18,000-20,000 deer/car accidents annually for the past 5 years. In 2020, there were over 550 injuries and there were 9 deaths due to these deer/ driver collisions.</p> <p>The overpopulation of Whitetail deer seems to be becoming a serious Public Health and Public Safety Issue in Wisconsin.</p> <p>Wolves are the only sensible solution to culling sick and overpopulated deer, and at no cost to the taxpayer. With maybe 600 wolves left in WI and 1.6 million deer, why is killing any WI wolf a good idea? Zero Quota is the only logical number for an WI wolf hunting and trapping season in 2021 and in future years.</p>
Bergstrom	Sarah	<p>I spoke at the last meeting as part of the public testimony. I would like to submit that written testimony and additional comment for consideration as you wrap up the Public Input survey and make decisions about a fall hunt quota. I'm writing as a Wisconsin resident, and board member of the Friends of the Wisconsin Wolf and Wildlife non-profit organization.</p> <p>My name is Sarah Bergstrom and I live on a farm in rural Chippewa County.</p> <p>I have had a few wolves on and adjacent to my property. Wolves haven't bothered the dairy cattle that pasture on my land. They haven't bothered my neighbor's beef cattle. I walk my dogs all over the property and have never once felt scared or threatened by wolves. And we still have plenty of deer. Aside from the occasional wolf sign, or trail cam image, I would never know they were there.</p> <p>On February 23rd around noon, I came home from an early morning doctor appointment to find at least 6 trucks parked along my dirt, dead-end road, and hunters with dogs trespassing. While I've NEVER felt afraid of wolves here, I WAS scared to find a large pack of strange men with guns and dogs tramping all over the property near my family's home.</p> <p>My boyfriend identified and confronted some of the hunters later in the day. They knew this zone would be closing and that it was already over quota. It was obvious they did not care and were not done hunting.</p> <p>That night, we made a campfire and sat awake outside all night, in February, to try to deter hunters from trespassing when they thought we'd be asleep. We sat in the dark, listening to hounds in pursuit, well into the night and past the curfew for using dogs in the hunt.</p> <p>That's how the last 24 hours of the hunt went for us.</p> <p>I didn't need to spend more than 5 minutes scrolling through public social media before finding plenty of evidence of hunters giving specific advice on how to get around quotas and maximize the total kill. That is not ethical hunting. My point here is that when considering a quota, you can't set that number in a vacuum that assumes rule-following, conservation-minded hunting when you know based on past experience that this is not the dynamic at play.</p> <p>Having lived in rural Wisconsin most of my life, I believe that supporting farmers needs to be a key focus of this and any other natural resource planning. I disagree that a state wide recreational hunt is an effective way of reducing depredation on cattle. In fact, both research and the anecdotal evidence of the high depredation numbers since the 2021 hunt, support the notion that destabilizing packs through recreational hunting actually increases the likelihood that wolves will prey on cattle and domestic animals.</p> <p>If lethal removal of wolves is warranted, it makes much more sense to specifically target problem wolves, rather than widespread destabilization of packs, many of which are not in areas where depredation is a particular concern. This type of hunt is actually creating the very problem you are claiming to be solving. Doubling down with a second hunt in 2021 is just going to make this worse.</p> <p>Without having a better idea of the full impact of the February hunt, a zero quota is the only responsible answer.</p>
Fuchs	Lori	<p>wildlife belong to all citizens. While I personally support wolf management, I strongly disagree with last years hunt. The DNR violated Public trust by allowing the February wolf hunt to exceed quotas, as well as occurring during breeding season. Out of state so called hunters used high tech tracking and hounds during night to run alpha male wolves and possible prenat females down to slaughter. this is unethical and does not promote sustainability of wisconsin wolf population. the carnage exceeded quota so quickly the hunt had to be stopped early. as supported bu DNR recording, loss of alpha males leads inexperienced males to attack livestock. Please strongly consider the following: - Use scientific data to verify population counts and drive quota numbers. hunt to sustain population, or for meat; not trophy hunting. - do not let the hunt occur in February when mating is taking place. -hunt quota for sustainability, not the uncontrolled carnage that occurred last February. - Ban especially, the hust of hounds for hunting. Also high tech tracking systems.</p>
Powers	Laurel	<p>We are opposed to the fall hunt on the wolves in Wisconsin. Please listen to the general public, and do not have a hunt and if you do the quota should be zero because the majority of citizens do not want a hunt.</p>
Kraemer	John	<p>This atrocity cannot happen again. The wolves in this state need to be protected and not hunted. These wonderful creatures are essential to the well being of the eco system. Native people understand it - why can't you?</p> <p>I am writing in regard to the upcoming wolf hunt and the upcoming Wolf Harvest Advisory Committee meeting. At the present time, it is clear that insufficient information and data exists to assess Wisconsin's wolf population, and Wisconsin's wolf management plan update process is not yet underway. Wisconsin is in no position to come up with a science-based number for the Fall wolf hunt quota. Any quota that is determined must be based on best science and a transparent democratic process, not politics.</p> <p>However, we do know that the February wolf hunt exceeded the quota by 82%, a number that does not include the unborn pups or those pups who did not survive due to the dissolution of their packs. In fact, we may never truly know the full ripple effect of the February wolf hunt. This hunt interfered with reproduction during mating season for the first time in state history. As set forth in the "The February 2021 Wisconsin Wolf Hunt: A Preliminary Assessment" published April 27, 2021 by Wisconsin's Green Fire, "Based on loss of bred females and alpha males, it is reasonable to estimate that 60-100 of Wisconsin's wolf packs may lose all pup production due to the February hunt."</p> <p>Given all of this, the quota for any November 2021 wolf hunt should be set at the lowest number possible and be extremely limited. Finally, the number of permits given for the wolf hunt should be conservatively regulated, along the lines of how Wisconsin manages elk hunting. One of the elements that contributed to the quota exceedances in the February 2021 wolf hunt was the high number of permits that were given. To avoid a repeat situation, the number of Fall wolf hunting tags must be closely limited, and no hunter without a wolf tag should be allowed to participate in the wolf hunt. Thank you for your consideration of the importance of the Wolf Harvest Advisory Committee recommending a quota for the fall wolf hunt that is as low as possible.</p>
Handzel	Nathan	<p>I think it's a huge error to wipe out Wolf populations after European settlement. To reintroduce a native species to its home ranges is good. I think again, it would be a huge mistake to start hunting again a wolf population that is so small compared to its original pre European population. I understand that even Predator species need to be monitored and kept in check. But I would remind of the balance wolves bring back to the eco system. They keep in check deer populations help keep riparian areas as they should be because deer are aware of predators can't stay in one spot. I would also remind you of the local Tribes treaty rights regarding this issue. I highly recommend stress that you honor their legal rights. Please do an actual scientific review of the impacts. Don't just give in to those who want to hunt despite the negative impact possible. It was a mistake to get rid of them let's not repeat the same mistake</p>
Hughes	Dylan	<p>I strongly oppose the fall wolf hunt- with the rushed hunt in February there needs to be more time for research on where the population stands currently and guidelines put into place before a hunt can be run again.</p>

DuBois	Marcel	It sickens me to think that there is going to be another wolf hunt this fall and hopefully they are relisted on the endangered species list and it can be avoided. But if we have to do this, can you please use scientific studies to determine what the quota should be? You are not a scientist and neither am I but there are people that are a lot more knowledgeable in this field and you should listen to them so that we do not have the debacle you created this spring. It's not too much to ask since the population of an apex predator affects the populations of so many other animals in this state and you have a responsibility to all of them. Your responsibility is not to hunters or landowners who are marginally affected (really not at all) by wolves. In the spirit of transparency, you should let everyone know which studies were used and who they were funded and created by when you announce the details for the fall hunt.
Schrank	Scott	The quota for the fall wolf harvest should be zero wolves
Cooper	Ruth	To the DNR, I have a concern about the proposed wolf hunt. Wolves are part of the Eco system They keep the deer herds healthy by taking the weak. They have to eat meat in order to survive. What happened this winter shows that how fast the wolf population can be wiped out. I strongly disagree with another wolf hunt. R Cooper Sent from my iPad
Hayward	Julie	I am among the majority of Wisconsin citizens who recognize the value of a healthy, protected population of gray wolves for many ecological, environmental and cultural reasons. I appeal to you to prevent another unscientific, profoundly inhumane, unnecessary and destructive wolf-killing season.
Skup	Debra	Please set the wolf hunt quota to 0.
Foscato	Rich	Please take back control of managing the wolf population from outside of the state hunting groups. The last hunt was disorganized and shows that the actual population of Wisconsin's wolves is not known, therefore they are not being managed. The last hunt was way over the quota, combined with poaching and poisoning of wolves...we really need to set a level of the population before having another hunt. The facts are that a healthy wolf population controls both deer wasting disease and deer/vehicle strikes, both which benefit all in Wisconsin. Please stand up to the nonsense of radical fringe groups that want all the wolves to be destroyed. That is not how citizens of Wisconsin expect the DNR to manage our wild resources. If predation on farms or livestock is an issue, then there are many ways to mitigate the problem wolves and compensate those whose livelihoods rely on farming. This is not an either or discussion. Those that make the argument along those lines will want all wolves decimated or reduced to a token handful of interbred wolves
Werra	Garry	I appreciate the opportunity to provide my opinion. I want to start by stating I do not support wolf hunting. Relying on hunter funding of the WDNR, leads to a narrow focus on managing game animals for a small special interest base and doesn't represent most of the state. I am asking the WDNR to broaden opportunities and increase funding for game and non-game species. As fewer people hunt now and into the future, the continued support of hunting depends on the attitudes of non hunters. I oppose trophy hunting of any kind and that is what Wolf hunting is. The majority of WI citizens are non- hunters and support wolves
Hanson	Louise	We are a non-profit organization that primarily advocates for dogs. We are writing today to provide input on the Fall Wolf Hunt Season. The February 2021 wolf hunt was a shameful slaughter of wolves and an embarrassment to most Wisconsin citizens. This blood sport and trophy hunt of wolves shocked people from around the nation and, in fact, from around the world. We do not fault the DNR for holding the court ordered February hunt and understand that the department had little time for planning. We do, however, fault the DNR for not taking all opportunities and using all of its authority to better control the process and the outcome. As the true impact of the highly efficient February "kill" is not yet known on Wisconsin's wolf population, we respectfully request that the DNR use its statutory authority to set a ZERO QUOTA for the fall hunt and any future hunts until a revised and updated study of the wolf population is completed and the recommendations of the Wolf Advisory Committee are published. Wolves and dogs are nearly genetically identical. The hunting of wolves with dogs appears to conflict with Wisconsin Statute 951 Crimes Against Animals, Section 951.08 Instigating fights between animals. The DNR should immediately use its authority to: <ul style="list-style-type: none"> •Limit hunting times to daylight hours •Prohibit the use of snowmobiles, ATVs and other motorized vehicles to pursue wolves •Enforce rules that prohibit dogs from attacking, biting, or injuring wolves •Increase oversight by wardens during hunting periods •Require kills to be reported within 4 hours to better monitor quotas •Prohibit the taking of collared wolves To remediate the negative impact on the tribes, other landowners and the general population, the DNR should: <ul style="list-style-type: none"> •Implement a minimum five-mile no hunt buffer zone around tribal lands and public lands used for silent sports •Set tighter parameters within hunting zones •Increase fines to hunters that violate private property and tribal territory boundaries
Krueger	Linda	1. Wildlife belong to all the citizens of Wisconsin (Public Trust Doctrine). I strongly oppose wolf trophy hunts, which is what the February hunt was. 2. It is beyond dispute that the February hunt was politicized, an unmitigated disaster, and an embarrassment to the State of Wisconsin. 3. Wisconsin statutes provide for an annual hunt. That hunt was held in February. To comply with Wisconsin statutes, no wolf hunt may be held during the remainder of 2021.
Willison	Barbara	Please register me as an opponent of the Fall Wolf Season in Wisconsin. The decision to delist the gray wolf as an endangered species was, in my opinion, premature and poorly considered. They have not recovered in enough numbers to become a serious threat to humans or livestock that could not be addressed at an individual, local level. Wolves are now known to be a keystone species in our natural environment and are among the wildlife which belong to all Wisconsin citizens under the Public Trust Doctrine. As such, they are not the property of any group or special interest, and are to be managed by Department of Natural Resources stewardship . Wolves are also an important part of the Native American culture, central to their origin story, and as such have a spiritual and religious significance which should not be taken lightly. Finally, and not at all the least consideration, I must emphatically state that the GPS assisted dog pack running, motorized chase, and leg snaring trophy killing are not in anyway the hallmarks of "fair chase" hunting. Where's the "sport" in gassing dens and shooting pregnant females? What incentive is there to be humane to the hunted animal when the animals being used to pursue them are often injured and killed while owners will receive a compensation check that is more than the value they put on their own dogs? Nothing about the hunt in late February 2021 could have been construed as stewardship of a great Wisconsin resource. It was an abomination and should never be repeated. At the very least, our population of Wisconsin gray wolves needs time to recover from the February disgrace, so any 2021 fall hunt should be canceled and the subject revisited in early 2022.
Liddell	Lori	I am a hunter. I was extremely offended and disheartened that the most recent hunt took place during the wolf breeding season. Wolves, according to the Public Trust Doctrine, belong to all the citizens of Wisconsin. The WDNR is required, by law, to set these hunting seasons and harvest totals according to thorough scientific analysis and through deliberative processes. There is no place for special interests or politics to have any say in this. I saw my first wolf, in the Eau Claire County Forest in 1979, during deer gun season, hunting with my dad. I live in the Clark County Forest now and this year is the first time in seven years that I haven't seen or Heard a single wolf in my neighborhood by mid June. I assume this means our local pack is no longer present. None of my immediate neighbors have not seen any in our area either. Not yet. There are fewer wolves. You guys don't even know what the impact will be of the hunt held in Feb. So how can you even consider a fall hunt this year. Especially since so many more were taken. I'm 59 years old today. I've hunted and fished all my life. Right here in WI. I know maybe 5-6 women my age who hunt. But, I know at Least 100 of my own age group who care about wolves. You're not hearing from them today because they don't know about this comment period. Wolves belong to all of us. Everyone's input must be considered, including tribal governments. You dont advertise these public comment opportunities well enough. A life long outdoorswoman and I just found out, here at the 11th hour. Do NOT have a fall hunt and get your facts together before we have another one
Farac	Stephanie	I am opposed to any wolf hunting. There should not be a hunt this fall. What took place in February was a bloodbath that cannot be undone. There is no science to back up this hunt. The wolves need to be left alone. The majority of the wolves killed in the fall hunt were deep in the forest not bothering anyone. The only reason I live in Wisconsin is because it's one of the last strong holds for wolves. I like hiking and hearing them howl at night. They have never bothered me or killed my pets. They eat the sick and injured animals. They are needed for the ecosystem. If you let the thugs kill the wolves again then you will have failed. Please hear my voice and let the wolves be. No fall hunt or any hunt. Thank you
Apollo		I am writing to respectfully request that you set a quota of 0 for the November wolf hunt. After what happened in February, it is clear that rules will be broken and quotas disregarded. Wisconsin's wolf population has already suffered a massacre this year and as an integral species in the maintenance of healthy ecosystems, we need to protect them. I fear that Wisconsin's wolves, a species that was nearly decimated, cannot sustain another hunt that involves the killing of any individuals. Please set a quota of 0 for the second hunt of the year.

Oliver	Lisa	<p>I am adding our names to the many others who strongly oppose the annual wolf hunt in Wisconsin.</p> <p>There is no scientific justification for the trophy hunting or recreational trapping of wolves, and the means of killing the wolves has been shown to be barbaric and unethical.</p> <p>Furthermore, a recent research poll (by Remington Research Group) determined that 62% of Wisconsin voters oppose the trophy hunting and trapping of wolves, 68% of the Wisconsin voters believed that the hunt was excessive, and the means of hunting (neck snares, steel traps and GPS radio collared hounds) was cruel and inhumane.</p> <p>We strongly urge a ZERO QUOTA, given the number of wolves taken last year, and the horrific means employed to kill them</p>
Jasik	Michelle	<p>It was undiscerning to my husband and I that an out of state organization was the driver in the lawsuit to conduct a wolf hunt in Wisconsin. Science has always provided the citizens of Wisconsin with our "Forward" thinking and actions. The winter hunt was an abomination, we had a "hunter" using a distress call in the 11th hour of the last day of the hunt in Vilas County, 200 yards away from our home. Hopefully, there won't be a fall hunt. The number of wolves killed, along with the unmeasurable number of pups that died as a result of the hunt, should put numbers low enough that it will take a few years for the population to rebound.</p> <p>If for some reason, lawsuits trump the science again, there should be a system put into place that once 75% of the target number of wolves killed is reached, the hunt would be shut down that day. Not allow for the overkill that occurred statewide and in the various zones. Time stamped photos should be required and even GPS points where the wolf was killed (if possible).</p> <p>We all hear about how the wolves are decimating the deer population. But, it doesn't seem that way in our little piece of Vilas County. The number of does in the winter that come through our property is anywhere between 20-30 per day. We saw between 2-3 bucks per week in the fall, but after hunting season saw maybe 1-2 per month. As long as people are feeding the deer in the Northwoods and we don't have Alberta clippers numerous times, the population will continue to increase. The philosophy that many people have is to let the population explode by eliminating all the bears, bobcats, coyotes and wolves that prey on deer. That short-sighted train of thought would ultimately bring disease, famine and detriment to the deer population, while destroying our natural resource base.</p>
Butler	Breanna	<p>I am emailing to ask the Wisconsin DNR and Natural Resources Board to set a zero quota for the November wolf hunt. I understand that this issue is being discussed on June 22 during the final Wolf Harvest Advisory Committee meeting.</p> <p>According to the Wisconsin HSUS:</p> <ul style="list-style-type: none"> • Nearly two-thirds (62%) of Wisconsin voters - across party affiliations, hunters, farmers and genders and geographic locations - oppose the trophy hunting and trapping of wolves. • The majority (68%) believe the February hunt killed excessive numbers of wolves. • Most (68%) voters are convinced that using steel-jawed, leghold traps or strangling neck snares on sentient wolves is intolerable and 66% oppose using packs of GPS radio-collared hounds to track and hunt wolves. <p>They also have released a new report - "A Call to End Wolf Hunting in Wisconsin" - a comprehensive analysis of the tremendous population loss and cruelty of Wisconsin's February 2021 wolf hunt, including a look at how the state undercounted wolves killed by poachers.</p> <p>I hope you will review this information and set a zero quota for the November wolf hunt. Another hunt could be detrimental to this keystone species.</p>
Raddatz	Kat	<p>Somehow in Wisconsin and across America, hunters have been logged into thinking that they can do whatever they want where animals are concerned. It is well overdue that the DNR stopped representing only the hunters and that our government stops allowing the hunting lobbies and hunting interest to ramrod through whatever they want when it comes to killing animals.</p> <p>1/3 of American wolves were killed since they were D listed in November 2020. Wolves were slaughtered during their breeding season. The disruption of families which is crucial to Wolf existence, created lone wolf situation which in turn create a situation of that Lonewolf going after livestock for his or her very survival. Then all we hear abouts that wolves are after our livestock. Animal behavior is almost always caused by human actions. It is time that the true guilty parties be held accountable for their actions.</p> <p>It is time for the individuals and organizations who speak and pressure only for killing another species be removed from office, and stop the concept that they are representing all citizens. Hunters are in the very small minority of citizens in Wisconsin, the United States, and in fact the world. It is time for the DNR to represent the other 90% of us who do not kill, mame,torture animals by any means.</p> <p>We keep talking about the science, but the science never seems to be heated. The experts are discounted. The Native American tribes are not consulted much less their wishes considered. Back in February 83% more wolves were killed then the quota the killers set for themselves. The illegalPoaching went on as well. With two few wardens to be on site.</p> <p>As a society, killing must no longer be viewed as entertainment. Yes even killing animals. Research also shows that often times when people kill animals they turn to injuring and killing humans next. Gandhi said that the measure of a nation is in how that nation treats animals. When we stop killing animals, we will stop killing each other.</p> <p>The animals, obviously created unable to speak or to organize, must have some champions in their corner. It is time we stand up for the animals, do the right thing, and allow them to live their lives, they are not coming to destroy hours. What happens to the animals eventually happens to the humans. We must not turn the other cheek and let them come to extinction.</p> <p>Also regarding the use of dogs in hunting, like the wolf kill, the use of dogs in the hunting is unconscionable. There needs to be special serious consequences for those who put a dog in that situation has to go after another of its own species and lose its life in the process.</p> <p>Do not allow a few hunters determine the fate of walls on the planet forever. Do not allow a wolf hunt this November. Do not allow additional Hundt's in between any previous Hundt's. Let's at long last step up and vote in favor of the animals and act in favor of the animals. And let's represent the 90% of us who are completely appalled by the behavior of these hunters and their lobbyists.</p> <p>I am a lifelong resident of Wisconsin and I have raised my children and grandchildren in this state. I would be horrified to walk on a trail with any of them for fear of getting caught in a leg trap stuck out in the middle of nowhere.</p>
Gaskill	Sharon	<p>I am glad for the opportunity to weigh in on wolf management in our state, as the wolves are my wolves, and I expect the DNR to base policies on recognition of this fact, that the population is managed in trust for all the citizens and in consultation with the tribal nations.</p> <p>I was appalled that the DNR was forced into a wolf hunting season last Fall by an out-of-state group; the so-called hunt was not based on science or data necessary, nor on our state laws on management. Packs were disrupted, increasing conflict and depredation, and long-term data was messed up. I realize you are well aware of this.</p> <p>The situation was also embarrassing. Wisconsin has had a good reputation for wolf studies and policies, but allowing a small interest group to run roughshod over our biologists has destroyed trust and will push the federal government to take over. Policies must have the trust of the majority of people. Night hunting and allowing dogs and ATVs to run the wolves is totally unacceptable; it is barbaric and sets us apart from science-based decisions.</p> <p>We cannot allow another hunting season like this. I ask for management policies that are based on current data collected in a methodical manner, policies that allow the DNR biologists to weigh all aspects of the issue, done in collaboration with our Native American tribal biologists. As a citizen who appreciates the roll of wolves in the ecosystem and wants a healthy population and recovery to go forward, this is not unreasonable, nor too much to demand.</p>
Mayer	Kate	<p>It has been with great sadness and anger that I have watched the Wisconsin's wolf population be targeted by the unethical hunters who seemingly have no interest in the long-term health of our state's wolves. The last hunt illustrated this lack of ethics--using dogs, killing pups, hunting at night..... I am ashamed of Wisconsin (the only state allowing dogs). I urge my DNR to use critical scientific data as your basis for decision making and reverse the travesty that has hit out wolves .</p>

Carloni	Tonya	<p>We are extremely against any proposed wolf hunt for the remainder of this year. What happened in February was horrid!!!</p> <p>The people of Wisconsin have shown they support wolves and you need to listen to that. Wolves are necessary to the ecosystem and need to be able to live and survive without the fear of being killed for no reason. They have a right to live as other wild animals do. They are not an animal that can be eaten and there is no reason for them to be killed.</p> <p>We have a few statistical comments below backed by links to resources supporting them. We would appreciate my statement being heard and taken into consideration.</p> <p>We work with rescued wolves, educate the public about them and they are amazing animals that are necessary in our world.</p> <p>1.You did not follow the WDNR's mission statement in regards to the February wolf hunt and the state violated the Public Trust Doctrine.</p> <p>2.Determining the quota for the February hunt was not an inclusive process. The quota, season dates, and reporting structure did not ensure that a sustainable population of wolves would be maintained, and a fall hunt SHOULD NOT follow the same processes.</p> <p>3.The biological impacts of the February 2021 hunt, held during the wolves' breeding season, will never be fully understood due to a lack of important biological data collection. Impacts to the overall population, and impacts to specific local wolf packs, cannot be known. Wisconsin's Green Fire (WGF) states in their recently released Conservation Bulletin "Although there are significant uncertainties associated in making a prediction based on limited information, we believe that based on loss of bred females and alpha males, it is reasonable to estimate that 60-100 of Wisconsin's wolf packs may lose all pup production due to the February 2021 hunt. If this impact is realized it will represent 24-40% of the expected reproduction from 245 known wolf packs outside of Indian reservations in Wisconsin."</p> <p>4.Wolves respond to human hunting pressure in surprising ways. Packs are more likely to break up if an alpha animal is killed, which can cause an increased risk of younger, more inexperienced wolves to attack "easy" prey such as livestock, as these wolves lack the cohesive pack unit. Aggressive human hunting of wolves can actually result in increased conflict with farmers, and more wolf depredations on livestock. Wolf depredations are occurring now in Wisconsin after the February 2021 wolf hunt at an increased rate. https://dnrx.wisconsin.gov/wdacc/public/depredation/2021</p> <p>5.You receive 90% of your funding from the sale of hunting and fishing licenses, according to a January 2017 internal report. There is a steady decline in the number of recreational hunters nationally, as only 4% of people now identify themselves as hunters (National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. 2016). Relying on hunter funding leads to a narrow focus on managing game animals for a small special interest base. You need to broaden opportunities for non-consumptive users and increase funding for conservation decisions that benefit game and non-game species. As fewer people hunt now and into the future, the continued support of hunting depends on the attitudes of non-hunters. Most support hunting to obtain meat and oppose hunting only to obtain a trophy. The majority of Wisconsin citizens are non-hunters who support wolves.</p> <p>6.A reliable wolf population estimate will be lacking when quotas are set for the proposed fall 2021 hunt. WGF's recommendation that "WDNR wildlife biologists must make their best efforts to assess and model the impact of the 2021 February hunt, including estimating illegal or unregistered kills, removal of pregnant females, and loss of alpha males on the wolf population. Current population models and population estimation methods should also be assessed for reliability. This impact analysis should be completed and made available to the Wolf Advisory Committee prior to your development and public release of 2021 fall harvest quota alternatives."</p> <p>Thank you for taking our words into consideration.</p>
Hagerty	Kay	<p>I am asking for a ZERO QUOTA for the November wolf hunt. There is no science-based justification for the trophy hunting or recreational trapping of wolves. Wolves are vital to any ecosystem. The result of the Remington Research Group shows how Wisconsin voters feel about trophy & trapping of wolves. #1-Nearly 62% of Wisconsin voters (across party affiliation, hunters, farmers, & genders & geographic locations) OPPOSE the trophy hunting & trapping of wolves. #2-The majority(68%) believe the February hunt killed EXCESSIVE numbers of wolves. #3-Most(68%)voters are convinced that using steel-jawed, leg hold traps or strangling neck snares on sentient wolves is INTOLERABLE. #4-66% oppose using packs of GPS radio-collared hounds to track & hunt wolves. I respectfully ask you again for ZERO QUOTA for the November wolf hunt</p>
Roth	Susan	<p>I am writing to respectfully request that the quota for the November wolf hunt be set at zero. Thank you for your consideration of this correspondence and my position on this issue.</p>
Marie	Trish	<p>I'm writing to urge you to ask for a fall wolf hunt quota of ZERO, for the ill advised but legally required fall wolf hunt (having a mandatory hunt itself extremely ill-advised.). Wisconsin law currently states there must be a hunt, but it does not state there has to be any available quota. Barring having a quota of zero, a quota of ONE wolf per unit would produce the least biological damage.</p> <p>Wisconsin biologists still have no idea what the consequences to the wolf population and pack structure of the February slaughter (you can hardly call it a "hunt") is. Wisconsin Green Fire, a group composed of current and retired biologists and field researchers, among other experts, recently released a Conservation Bulletin in which they show it is likely that 60 to 100 of Wisconsin's wolf packs will lose ALL pup production for the current year.</p> <p>The Wisconsin DNR (as DNRs in all states) claims they use scientific data in managing wildlife. The February hunt--which, granted, the DNR didn't want (but they didn't exactly go to bat for the wolves either)--was about as anti-science as it is possible to get. A literally guessed at quota, no biological data collected, kill numbers way past the arbitrarily produced quota in any case, few consequences for participant hunters who broke the rules (often flauntingly so). Given the extreme kill numbers of the February hunt, the lack of biological data as to consequences, the lack of information as to how it has affected Wisconsin's wolf population, the only reasonable course is to limit the fall hunt to as few wolves killed as is legally possible until better management can be produced with sufficient data.</p> <p>As an aside, wildlife is a public trust that belongs to ALL citizens. For far too long, wildlife management decisions have been made based on the desires of a small fraction of the population; namely, hunters and trappers. With hunting participation continuing to fall, and non-consumptive users continuing to grow in number, relying on hunters to fund (and make decisions for) wildlife management is a road to nowhere. DNR's in all states will come under increasing criticism and political scrutiny if this trend continues. It's past time that state DNRs and wildlife managers find alternative funding sources that includes a more diverse range of the population and opinions about how to interact with wildlife..</p>
Steussy-Williams	Aelx	<p>To whom it may concern,</p> <p>I live and work at Teaching Drum Outdoor School in Three Lakes, WI. We are an intentional community and we teach wilderness survival skills, including hunting and trapping. We respect and love our non-human kin, even those we kill and eat.</p> <p>Wolf is our neighbor, our inspiration, and in many ways, the very foundation of our community. We hold an annual week-long wolf tracking class third week of February each year. We follow our local packs throughout the white season. There is no reason--no need--to hunt wolves. We observe them, and we learn from them.</p> <p>The past wolf-hunt season was dishonoring to the people and the wolves of this state. Someday our children will look back on hunts like this one and be ashamed, incredulous that we could do such a thing.</p> <p>Please consider making a stand for us at Teaching Drum, for the people of Wisconsin, for the wolves, and for the Earth.</p>
Miller	Flora	<p>I've been researching as much information as possible about why you are considering another wolf hunt this fall in our state and every statistic I read points to the fact that such a hunt is not to help "maintain" a healthy population. The killing of wolves was allowed last fall due to callous efforts of Donald Trump; lifting the Endangered Species Act only allowed supporting groups of the Republican party to hunt down - with bait, dogs, traps and guns - 226 wolves that were doing no harm to anyone. These beautiful animals - a much needed component of our natural environment - were slaughtered out of political vindication, sport and what these idiot hunters call sport. How can you possibly even think a second hunt ... or any future hunts are necessary!</p> <p>It's said that wolves target cattle and other livestock; however, statistics show that only 33 cattle fatalities occurred out of 3.45 million cows!!! Yet, we allow populations from other states to come into our state and destroy an animal which plays an important role in maintaining the deer and other wildlife population in the northern part of our state. Studies have also shown that there are fewer auto accidents (and, consequently fatalities) in states in which wolves reside. I could go on and on in regard to why ANY future hunts should NEVER take place; however, I only have five minutes before this email must find its' way to you.</p> <p>Groups are organizing to protest any future hunts, and we will be contacting our state and federal representatives and wildlife agencies to prevent the slaughter of these beautiful animals. You know the right thing to do. DO NOT allow the fall hunt to take place. Efforts will get the protections back in place. DO the RIGHT thing to protect the wolves!!!</p>
Saler	Tom	<p>This email is to request that the DNR set a ZERO quota for the November wolf hunt.</p> <p>According to a recent poll, 62% of Wisconsin residents oppose the trophy hunting and trapping of wolves, 68% believe the February hunt killed an excessive number of wolves, and that a similar number think that steel-jawed, leghold traps or strangling neck snares are inhumane</p>
Mahuna	Karin	<p>Thank you for the opportunity to comment today. I would like to thank the DNR personal and staff who recommended against the February wolf hunt and who clearly stated that Wisconsin is able to support many more wolves than originally thought.</p> <p>The notion that Wisconsin should cap the population at 350 wolves is based neither in science nor on social tolerance. The majority of Wisconsin citizens want wolves protected. Wolf depredation on livestock is extremely rare and deer population is almost 2 million. Wolves help to keep Wisconsin's deer populations healthy and help to minimize deer impact on Wisconsin's vegetation.</p> <p>The way in which the fall hunt was carried out was nothing short of an atrocity and displayed the worst in humanity. Well over 300 wolves were killed outright when one accounts for all the poaching and unregistered kills. It has also been estimated that 25-40% of this years pups were lost due to slaughtered bred females and loss of alpha males.</p> <p>I would request that more respect be shown to Wisconsin's tribal nations whose wishes were totally ignored in February and that a full analysis of the February hunt be completed and presented to the Wolf Advisory Committee before any hunt quotas are set. Wolves belong in Wisconsin and have never exceeded the land's carrying capacity - unlike deer. I personally request that the fall hunting quota is set at zero.</p>

Swanson	Elaine	<p>I write from east-central Wisconsin where our family resides on 50 acres of land, land that has become sanctuary for wildlife after over 30 years of labor replacing crops with prairie, woods, and ponds. While we don't expect to see a gray wolf run across our land, I nevertheless feel a strong sense of this animal's presence. I have listened to tribal members express their soulful connection to the wolf, and I myself feel a similar sense of communion with this animal.</p> <p>Totally absent - as all reports of the February 2021 hunt show - was control of the behavior of the hound hunters who rode on snowmobiles and ATVs, savagely hunting down the wolves to exhaustion, viciously delighting over this vile form of amusement. The people in communities across the state were overwhelmingly opposed to this hunt. Yet the power to become predator of our wolves was given to a minority with special interests representing disturbing behavior.</p> <p>The shameful history of our treatment of wolves has been rendered public across the country in respected journals and through press coverage. It will remain a moral stain on the souls of our community.</p> <p>Wisconsin wildlife is held in the public trust. Wildlife belongs to the people. Somehow, sadly, this truth has been disrespected. The actions on the part of the very agency charged with protecting our natural resources has disregarded our rights. This is a travesty of the worst kind.</p> <p>There is not reliable, trust-worthy data gathered from peer-reviewed sources to document the effects of the February 2021 wolf slaughter. There is inadequate justification, therefore, to expect serious reason or purpose from the whimsy of a few who used their authority to disgrace Wisconsinites by the February hunt.</p> <p>I'm asking that you extend opportunities for non-consumptive users - for poets and photographers like myself - to be heard and counted. We are in the majority. We oppose the fall hunt. If it becomes reality by reason of Scott Walker's wolf hunt law, we the people urge a zero quota.</p> <p>Please bring a child to your next meeting that will determine the fate of our wolves. The presence of the future will provide you with the wisdom to act with character and with the responsibility you have to our wildlife. I urge you to demonstrate a moral and ethical code of conduct for the Wisconsin Wolf population. Our wolves deserve equal dominion over this land.</p>
Jacob	Debra	I am asking for a zero quota for this years hunt.

Last Name	First Name	Comment
Goltz	Joe	<p>I am writing you to encourage you to protect Wisconsin's wolf population.</p> <ul style="list-style-type: none"> •Hunting practices that will have negative impacts on the long-term health of the wolf population must be prohibited. <p>The precautionary principle must be exercised when setting a quota to prevent more harm to the wolf population. Critical data is missing on pack disruption, pup survival, number of illegal kills and number of wolves killed but not recovered. A quota must take into account the impact of the breeding season hunt on the wolf population.</p> <ul style="list-style-type: none"> •Hunting of wolves using dogs must be prohibited. Wisconsin is currently the only state that allows the use of dogs to hunt wolves. •Night hunting of wolves must be prohibited. •Stable wolf packs must be protected. Blanket and disorganized hunting of stable and established wolf packs can create disruptions that lead to increased conflicts with people and livestock. <p>Thank you for your time and attention.</p>
Stanek	Marsha	
Jakusz	Darlene	
Morningstar	Samuel	
Bey	Lisa	
Wolf	Mark	
Jacobson	Martin	
Taylor-Romero	Patricia	
Nowakowski	Jodie	
Beckman	Randy	
Zabrowski	Jayne	
Sands	Deb	
Bohm	Michael	
Talhami	Michelle	
Miller	Lester	
Kraly	Wendy	
Kosowicz	Aleks	
Driessen	Lynn	
Palmer	Christina	

Last Name	First Name	Comment
Horton	Deanna	<p>We support Wisconsin wolf management but it needs to include public input and thorough scientific analysis and deliberative processes as required by law. We need to include sportsmen and women, conservation groups, tribal leaders, and interested citizens to establish goals and build broad public support for managing wolves and minimizing wolf-human conflicts. The public trust doctrine says that wildlife belong to all citizens of Wisconsin, and they are held in trust for the public. We believe it is imperative that the WDNR and the NRB fulfill their responsibility to wolves as a public trust natural resource by supporting the further development and implementation of scientific wolf management practices using current scientific and cultural information.</p> <ul style="list-style-type: none"> •The WDNR did not follow it's mission statement in regards to the February wolf hunt and the state violated the Public Trust Doctrine. •Determining the quota for the February hunt was not an inclusive process. The quota, season dates, and reporting structure did not ensure that a sustainable population of wolves would be maintained and a fall hunt is following the same processes. •The biological impacts of the February 2021 hunt, held during the wolves' breeding season, will never be fully understood due to a lack of important biological data collection. Impacts to the overall population, and impacts to specific local wolf packs, cannot be known. Wisconsin's Green Fire (WGF) states in their recently released Conservation Bulletin "Although there are significant uncertainties associated in making a prediction based on limited information, we believe that based on loss of bred females and alpha males, it is reasonable to estimate that 60-100 of Wisconsin's wolf packs may lose all pup production due to the February 2021 hunt. If this impact is realized it will represent 24-40% of the expected reproduction from 245 known wolf packs outside of Indian reservations in Wisconsin." •The WDNR receives 90% of its funding from the sale of hunting and fishing licenses, according to a January 2017 internal report. There is a steady decline in the number of recreational hunters nationally, as only 4% of people now identify themselves as hunters (National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. 2016). Relying on hunter funding leads to a narrow focus on managing game animals for a small special interest base. WDNR needs to broaden opportunities for non-consumptive users, and increase funding for conservation decisions that benefit game and non-game species. As fewer people hunt now and into the future, the continued support of hunting
Berglund	Carol	
Horton	Dan	
Joers	Staci	<p>To Whom it may concern;</p> <p>I am a citizen of the state of Wisconsin and want you to know how I, and many that I know, feel about what is happening in our state regarding the hunting of our wolves. There are so many aspects of the decision to have a wolf hunt that I do not understand. How is it possible for trophy hunters from a different state to come to Wisconsin and sue to hunt our wolves? And how can one Judges decision, dictate a judgement for the entire state of Wisconsin? All citizens should have a say and not just special interest lobbying groups. We need to include sportsmen and women, conservation groups, tribal leaders, and interested citizens to establish goals and build broad public support for managing wolves and minimizing wolf-human conflicts. The public trust doctrine says that wildlife belong to all citizens of Wisconsin, and they are held in trust for the public. We believe it is imperative that the WDNR and the NRB fulfill their responsibility to wolves as a public trust natural resource by supporting the further development and implementation of scientific wolf management practices using current scientific and cultural information.</p> <p>My understanding of the recent February wolf hunt was a well thought out plan, by the Koch financed "Hunter Nation". We are in a grave situation here in Wisconsin and something needs to be done. The recent February wolf hunt was pushed through in record time with minimal time for public input (48 hours). The comments they did receive were overwhelmingly against the hunt. How is it possible that a small few can dictate what happens in our state?</p> <p>I, personally, am adamantly against wolf hunting and the only way I can see this changing is if the wolves are put back onto the Endangered Species List.</p> <p>The propaganda used by these special interest groups is intended to frighten people. One of the reasons they site is Wolf depredation on farms. This occurred at only 13 out of over 70,000 farms in Wisconsin. And these farmers can use lethal control if necessary and get reimbursed for their losses. I understand hunting to cull herds and control population of species that grow exponentially without control. But I do not understand hunting just for the thrill of the kill. These vigilante hunters that are trying to reshape hunting into a trophy sport that is all about blood lust. They need to be stopped.</p>
Hillard	Ashley	
Smith	Melissa	<p>Great Lakes Wildlife Alliance and Friends of the Wisconsin Wolf and Wildlife support Wisconsin wolf management but it needs to include public input and thorough scientific analysis and deliberative processes as required by law. We need to include sportsmen and women, conservation groups, tribal leaders, and interested citizens to establish goals and build broad public support for managing wolves and minimizing wolf-human conflicts. The public trust doctrine says that wildlife belong to all citizens of Wisconsin, and they are held in trust for the public. We believe it is imperative that the WDNR and the NRB fulfill their responsibility to wolves as a public trust natural resource by supporting the further development and implementation of scientific wolf management practices using current scientific and cultural information.</p>

Last Name	First Name	Comment
Savage	Don and Susan	<p>Why we strongly OPPOSE A FALL WOLF HUNT:</p> <ol style="list-style-type: none"> 1) The February wolf slaughter resulted in 83% more wolves killed than allowed by the set quota. Mismanagement to this degree is unacceptable. 2) Because the slaughter was allowed during the breeding season, pregnant females and alpha males (the only members of the pack allowed to mate) were undoubtedly killed. Because this information wasn't required, no one knows the ages, sexes, and reproductive state of those killed making it impossible to accurately assess the remaining population and its impact on future populations. Setting quotas without knowing this species current status goes against all scientific principles. 3) Destabilized packs disperse lone wolves who, in order to survive without their pack, go after easier prey like farm animals rather than their wild prey like deer. 4) Apex predators are essential to healthy ecosystems. For example, wolves help us control CWD among deer populations. Curbing deer overgrazing encourages the biodiversity of flora and fauna. 5) No limits were placed on the February slaughter allowing extreme cruelty (using hounds, snowmobiles, night hunting, traps, etc.) and allowing 24 hours to report kills. What happened to the "fair chase" aspect of hunting? The atrocities committed in February resulted in national outrage. 6) According to the public trust doctrine, our WI wildlife belong to all WI citizens but, due to this rushed hunt instigated by out-of-state trophy hunters, our WI Tribes, scientists, and ordinary citizens like us were left out of the decisions. <p>We are longtime citizens of this state, recreate all over our state, buy park stickers and trail passes annually, own hunting licenses, participate in Conservation Congress matters, etc. But not only are we adamantly opposed to the Fall wolf hunt but we also want to know what the WI DNR, which is charged with protecting our natural resources, is going to do to prevent another such debacle and address the above listed issues.</p> <p>Respectfully submitted, Dr Donald Savage Mrs Susan Savage</p>
Giese	Mark	

Last	First	Comments
		<p>I am writing in regard to the upcoming wolf hunt and the upcoming Wolf Harvest Advisory Committee meeting. At the present time, it is clear that insufficient information and data exists to assess Wisconsin's wolf population, and Wisconsin's wolf management plan update process is not yet underway. Wisconsin is in no position to come up with a science-based number for the Fall wolf hunt quota. Any quota that is determined must be based on best science and a transparent democratic process, not politics.</p> <p>However, we do know that the February wolf hunt exceeded the quota by 82%, a number that does not include the unborn pups or those pups who did not survive due to the dissolution of their packs. In fact, we may never truly know the full ripple effect of the February wolf hunt. This hunt interfered with reproduction during mating season for the first time in state history. As set forth in the "The February 2021 Wisconsin Wolf Hunt: A Preliminary Assessment" published April 27, 2021 by Wisconsin's Green Fire, "Based on loss of bred females and alpha males, it is reasonable to estimate that 60-100 of Wisconsin's wolf packs may lose all pup production due to the February hunt."</p> <p>Given all of this, the quota for any November 2021 wolf hunt should be set at the lowest number possible and be extremely limited. Finally, the number of permits given for the wolf hunt should be conservatively regulated, along the lines of how Wisconsin manages elk hunting. One of the elements that contributed to the quota exceedances in the February 2021 wolf hunt was the high number of permits that were given. To avoid a repeat situation, the number of Fall wolf hunting tags must be closely limited, and no hunter without a wolf tag should be allowed to participate in the wolf hunt. Thank you for your consideration of the importance of the Wolf Harvest Advisory Committee recommending a quota for the fall wolf hunt that is as low as possible.</p>
Jacobus	Jolie	
Munger	Martha	
Herbst	John	
Berg	Sandra	
Laxton	Jennifer	
St. Onge	Emily	
Ferber	Don	
Coleman	Jennifer	
Johnson	Karen	
Foren	Harper	
Zorn	Glenn	
Felder	Mildred	
Roberts	Cameron	
Steinmann	Sue	
Kneisler	James	
Miles	Janet	
Johnson	Greta	
Paepke	Andrew	
LaFontsee	Dana	
Goell	William	
Begalske	Leigh	
Rieckmann	David	
Hanson	Becky	
Sonada	Jadine	
Saari	Kelsey	
O'brien	Michael	
H	Kay	
Knoepfel	Kathleen	
ruedinger	Kyle	
Pain	Carolyn	
Groves	Jennie	
Reske	Sue	
Verhagen	R.	
Moore	Kate	
Mills	Bronwyn	
Renley	Kevin	
Koehl	Jeremy	
Van Buren	Maggie	
Mueller	Amy	
Mueller	Josh	
Gottschalk	Linda	
	Erika	
Hahn	Mary	

Pesko	Pat	
Kwasneski	Cathie	
Leannah	Geralyn	
Butts	Dean	
Bowen	Richard	
Rothe	John	
Junek	Mary	
Marotz	Bill	
Johnson-Lange	Carol	
Williams	Sandra	
Menter	Sue	
Pearson	Earnest	
Gavigan	Colleen	
Yank	Mary	
Strabala	Patrick	
Gunning	Terry	
Kartman	Sue	
Gainey	Richard	
Holzman	Catherine	
Uhler	Patricia	
Kosowic	Aleks	
Hopper	Victoria	
Piper	Alexis	
Buchert	Suzanne	
Pustejovsky	Mary	
Neuman	Lori	
Michettie	Susan	
Haebig	Susan	
Mastri	Francis	
Eric	Sorenson	
Kearns	Marcella	
Gibson	Paul	
Schmaling	Hollis	
Schott	Kaitlin	
Clauser	Donald	
konkel	Deborah	
Beduhn	Deborah	
Adams	Glory	
Overby	Gary	
Stewart	Leslie	
Crittenden	Kathleen	
Gibbons	Valerie	
Abraham	Roger	
Postel	Heaven	
Starr	Susan	
Nielsen	Meg	
Powers	Laurel	
Larson	Carol	
DeMarco	Kelly	
Jackson	Marianne	
Hitchman	Linda	
Thacker	Alyssa	
Kuney	Jarell	
Chagnon	Laurie	

To: Randy Johnson, Large Carnivore Specialist

and Chair of the Wisconsin Department of Natural Resources Wolf Harvest Committee

From: Kerry A Beheler Mount Horeb WI 18 June 2021

RE: Additional Written Public Comments Regarding the 2021 Fall Wolf Hunt

I am Kerry Beheler, a Wisconsin citizen, and an avid outdoors woman. I am an upland gamebird hunter and a deer hunter. For over 5 decades I have been taught, and have practiced, ethical hunting by many valued mentors. I continuously strive to educate others about ethical hunting.

The Wisconsin February 2021 wolf hunt was not an ethical hunt. It was a reckless and rushed recreational trophy hunt. Many of the state sanctioned methods used - running wolves with multiple packs of hound trailing dogs, pursuit by snowmobile and ATVs, night hunting, are not ethical fair chase hunting methods.

I was the Wisconsin Department of Natural Resources (WDNR) Wildlife Health Specialist for 14 years (1991-2004), and the lead necropsy technician for the Anatomic Pathology Unit of the University of Wisconsin -Veterinary Medicine Teaching Hospital (2015-2018). I have conducted thousands of necropsies on wild and domestic animals. I volunteered and participated in the May 2021 necropsies performed by the Great Lakes Indian Fish and Wildlife Commission on some of the wolves killed during the February 2021 trophy hunt.

In my nearly 30 years of anatomic pathology experience, the extent of intentional premortem trauma that I observed, and that was documented, with these February 2021 wolves was egregious and appalling. These wolves were not simply and cleanly "killed". The state sanctioned and legal methods allowed that caused extreme extensive traumas must not be allowed to occur again in Wisconsin.

The public trust doctrine says that wildlife belong to all citizens of Wisconsin, and that they are held in trust for the public. The public trust doctrine was violated, as were the wolves, during the February 2021 trophy hunt. I believe it is imperative that the WDNR and the NRB fulfill their responsibility to wolves as a public trust natural resource by supporting the further development and implementation of scientific wolf management practices using current scientific and cultural information. The state sanctioned trauma cannot be allowed to continue.

The WDNR failed in it's mission with the February 2021 wolf hunt. The mission statement is "To protect and enhance our natural resources: our air, land and water; our wildlife, fish and forests and the ecosystems that sustain all life. To provide a healthy, sustainable environment and a full range of outdoor opportunities. To ensure the right of all people to use and enjoy these resources in their work and leisure. To work with people to understand each other's views and to carry out the public will. And in this partnership consider the future and generations to follow." <https://dnr.wisconsin.gov/about/mission>

I believe the February 2021 Wisconsin wolf hunt was wrong. Let us not repeat this. Thank you for your consideration of our Wisconsin wolves, a public trust natural resource.

My previously submitted written public comment regarding the 2021 Fall Wolf Hunt is repeated here:

To: Randy Johnson, Large Carnivore Specialist

From: Kerry A Beheler Mount Horeb WI

RE: Written Public Comments Regarding the 2021 Fall Wolf Hunt submitted 13 May 2021

February Wolf Hunt Considerations: The WDNR did not follow its mission statement in regards to the February wolf hunt. The mission statement is “To protect and enhance our natural resources: our air, land and water; our wildlife, fish and forests and the ecosystems that sustain all life. To provide a healthy, sustainable environment and a full range of outdoor opportunities. To ensure the right of all people to use and enjoy these resources in their work and leisure. To work with people to understand each other's views and to carry out the public will. And in this partnership consider the future and generations to follow.” <https://dnr.wisconsin.gov/about/mission>

Determining the quota for the February hunt was not an inclusive process. The quota, season dates, and reporting structure did not ensure that a sustainable population of wolves would be maintained. Required consultation with the Wisconsin Ojibwe Tribes was not conducted. The Wisconsin Natural Resources Board (NRB) disregarded the WDNR's recommendations and their abbreviated scientific analysis. The NRB ignored public opposition and Tribal rights by demanding a quota of 200 wolves, and that 4,000 licenses be issued for the February hunt.

There was unprecedented hunting pressure on wolves. 18,503 people applied for a wolf hunting license, and 1548 licenses were purchased. The number of licenses sold represented a 13:1 ratio of hunters to each of the 119 wolves approved for the hunt. This was the highest ratio of hunters to animals for any Wisconsin hunted species to date
<https://wiwolvesandwildlife.wordpress.com/2021/03/05/what-just-happened-to-wisconsins-grey-wolves/>

From February 22 to 24 2021, 218 wolves were registered as legally killed, 83% over the established harvest quota of 119, with numbers in specific harvest zones exceeded by more than 250% <https://widnr.widen.net/s/k8vtcgjwkf/wolf-season-report-february-2021>. More wolves were likely illegally killed and not reported, or killed during the hunt and not recovered. 188 wolves were killed by hunters using trailing hounds (86%).
<https://widnr.widen.net/s/k8vtcgjwkf/wolf-season-report-february-2021>. Wisconsin is the only state that allows hunting wolves with dogs.

Sex of the 218 known killed wolves were 116 males (53%), and 102 females (47%). Age was estimated by visual inspection of tooth wear and tooth eruption. Estimated age of known killed wolves was 20 young of the year (9%), 110 subadults (51%) and 85 adults (39%).
<https://widnr.widen.net/s/k8vtcgjwkf/wolf-season-report-february-2021> Carcasses were only briefly visually inspected when registered, and it is not known how many of the adult females were pregnant or breeding.

The biological impacts of the February 2021 hunt, held during the wolves' breeding season, will never be fully understood due to a lack of important biological data collection. Impacts to the

overall population, and impacts to specific local wolf packs, cannot be known. Wisconsin's Green Fire (WGF) states in their recently released Conservation Bulletin "Although there are significant uncertainties associated in making a prediction based on limited information, we believe that based on loss of bred females and alpha males, it is reasonable to estimate that 60-100 of Wisconsin's wolf packs may lose all pup production due to the February 2021 hunt. If this impact is realized it will represent 24-40% of the expected reproduction from 245 known wolf packs outside of Indian reservations in Wisconsin." <https://wgreenfire.org/2019/wp-content/uploads/2021/04/WGF-Cons-Bulletin-Feb-Wolf-Hunt-04-28-2021.pdf>

Wisconsin Wolf Hunt General Considerations: Gray wolves were removed from the federal endangered species list on January 4, 2021. The WDNR implemented a harvest season in February 2021 as a result of a court order. In compliance with statutory requirements, 2011 ACT 169, the next wolf hunt will begin in November 2021. WDNR is tasked with setting quotas and permit levels for this fall hunt. Wis. Stats. s. 29.185 directs the WDNR to allow the hunting and trapping of gray wolves if not listed on the federal or state endangered and threatened species list. The same statute also directs the WDNR to hold a single annual season for both hunting and trapping of wolves which begins on the first Saturday in November.

https://docs.legis.wisconsin.gov/code/register/2021/785a2/register/ss/ss_045_21_revised_scope_statement/ss_045_21_revised_scope_statement.pdf?fbclid=IwAR3EjxAgWMoCpbCa-U8d-wImT1KEENqeF3-uCPYJzz2YKR4gQ5_Lsv0xpBI

The WDNR receives 90% of its funding from the sale of hunting and fishing licenses, according to a January 2017 internal report. There is a steady decline in the number of recreational hunters nationally, as only 4% of people now identify themselves as hunters (National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. 2016). Relying on hunter funding leads to a narrow focus on managing game animals for a small special interest base. WDNR needs to broaden opportunities for non-consumptive users, and increase funding for conservation decisions that benefit game and non-game species. As fewer people hunt now and into the future, the continued support of hunting depends on the attitudes of non-hunters. Most support hunting to obtain meat, and oppose hunting only to obtain a trophy. The majority of Wisconsin citizens are non-hunters who support wolves. A Wisconsin wolf hunt is not about obtaining meat.

Wolves respond to human hunting pressure in surprising ways. Packs are more likely to break up if an alpha animal is killed, which can cause an increased risk of younger, more inexperienced wolves to attack "easy" prey such as livestock, as these wolves lack their cohesive pack unit. Aggressive human hunting of wolves can actually result in increased conflict with farmers, and more wolf depredations on livestock. Wolf depredations are now occurring in Wisconsin after the February 2021 wolf hunt at an increased rate.

<https://dnrx.wisconsin.gov/wdacr/public/depredation/2021>

Most of our Wisconsin wolves are concentrated in the northern portions of the state. According to WGF: "During the February 2021 hunt wolves were removed primarily from core habitats on public lands where conflicts with pets, livestock or human safety are already rare. There was correspondingly little reduction of wolf populations in areas of marginal habitat where livestock and pet depredations and human-wolf conflicts are most likely to occur. Based on currently available information and our understanding of wolf populations and behavior, there is little evidence that the February 2021 wolf hunt will significantly reduce human-wolf conflicts."

<https://wigreenfire.org/2019/wp-content/uploads/2021/04/WGF-Cons-Bulletin-Feb-Wolf-Hunt-04-28-2021.pdf>

A reliable wolf population estimate will be lacking when quotas are set for the fall 2021 hunt. I support WGF's recommendation that "WDNR wildlife biologists must make their best efforts to assess and model the impact of the 2021 February hunt, including estimating illegal or unregistered kills, removal of pregnant females, and loss of alpha males on the wolf population. Current population models and population estimation methods should also be assessed for reliability. This impact analysis should be completed and made available to the Wolf Advisory Committee prior to WDNR's development and public release of 2021 fall harvest quota alternatives." <https://wigreenfire.org/2019/wp-content/uploads/2021/04/WGF-Cons-Bulletin-Feb-Wolf-Hunt-04-28-2021.pdf>

Wolf Ecological General Considerations: Wolves are ecologically and culturally valuable to the Wisconsin ecosystem and tourism. Hunters, farmers, tribal members, teachers, small business owners, retirees, and conservationists support a sustainable wolf population. Some special interests say that a healthy and sustainable Wisconsin wolf population is not necessary, while the overwhelming majority of Wisconsin citizens support wolves.

Wolves fulfill valuable ecological functions on the Wisconsin landscape, contributing to the health and diversity of ecosystems where they occur. There are rising concerns about chronic wasting disease (CWD) in deer. Whatever effect wolves may have on CWD infected deer can be an overall benefit. As of May 2021, CWD has been found in wild or captive Wisconsin deer in nearly half of our 72 counties. Wisconsin testing data since 2002 shows that as less deer are tested, more are positive. This is not a good trend.

In Wisconsin there are currently 21 past or presently CWD infected captive deer farms north of Highway 21, a highway which bisects Wisconsin east to west. Lands north of Highway 21 begin the general areas of Wisconsin wolf habitat. CWD in captive farms constitutes a real and significant threat to the integrity of the Wisconsin deer herd. There is an ongoing risk of CWD escaping into the wild deer of northern Wisconsin. <https://dnr.wisconsin.gov/topic/wildlifehabitat/cwd.html>

Effective measures for controlling CWD remain elusive. How will we stop CWD from spreading into the northern Wisconsin deer herd? We can support natural control of sick deer by supporting the predators of sick deer. A CWD infected animal is not always obvious to a human hunter, yet a predator/prey relationship has been sustained over eons of coexistence. Predators select the weakened or sick individuals as prey. A 2015 Colorado/Wyoming study found that CWD infected adult mule deer had only a 32% annual survival rate, while uninfected deer had a 76% survival rate. The number one cause of death in the infected mule deer was mountain lion predation. The second leading cause of death was CWD itself. <https://www.wyofile.com/study-chronic-wasting-disease-kills-19-deer-annually/>

A 2009 CWD mathematical model evaluated the influence of randomly removing CWD sick animals by hunter harvest, intentional human culling, and selective predation by wolves. The model found the impacts of wolf selective predation were consistent and robust. That is, the

wolves did their job very well. Let us allow our Wisconsin wolves to perform this task.
<https://doi.org/10.7589/0090-3558-47.1.78>

Future Wolf Management Considerations: I support the resumption of state and tribal management of wolves in Wisconsin. I support reestablishing the wolf advisory committee and updating the 22 year old Wisconsin wolf management plan. The 1999 plan does not reflect the current status of Great Lakes wolves, current population trends, the latest ecological and social sciences, or public opinions. Until a new Wisconsin wolf management plan is approved, I ask that Wisconsin maintain a sustainable wolf population. Statistical analyses in 1999 showed that slightly over 600 wolves would maintain a viable stable population. Updated statistical analyses will likely yield new information.

Regarding Wisconsin wolf management, I support public input, thorough scientific analysis, and deliberative processes as required by law. We need to include sportsmen and women, conservation groups, tribal leaders, and interested citizens to establish goals and build broad public support for managing wolves and minimizing wolf-human conflicts.

The public trust doctrine says that wildlife belong to all citizens of Wisconsin, and they are held in trust for the public. I believe it is imperative that the WDNR and the NRB fulfill their responsibility to wolves as a public trust natural resource by supporting the further development and implementation of scientific wolf management practices using current scientific and cultural information.

“A thing is right when it tends to preserve the integrity, stability and beauty of the biotic community. It is wrong when it tends otherwise.” Aldo Leopold, A Sand County Almanac.

I believe the February 2021 Wisconsin wolf hunt was wrong. Let us not repeat this. Thank you for your consideration of our Wisconsin wolves, a public trust natural resource.

Cc: Members of the Wisconsin Natural Resources Board

Representative Sondy Pope

Senator Jon Erpenbach

My Wisconsin story with the grey wolf is very personal. When I heard the first “howl” in November of 2003 in our bog I immediately longed to understand more about this voice. Our property is just five miles east of the city of Wisconsin Dells. The property is the oldest existing hunting club in Wisconsin with its roots back to the 1880s when my great grandfather, Royal F. Clark found a lake, Lake Corning, to hold a vast area of wild rice, a duck and duck hunters favorite delight. He and his law partner, Art Lueck, had to buy it. So 605 acres became the Lewiston Outing Club, price in 1922, \$200. Pretty sure wolves were non-existent then as they were exterminated from the area in the early 1800s.

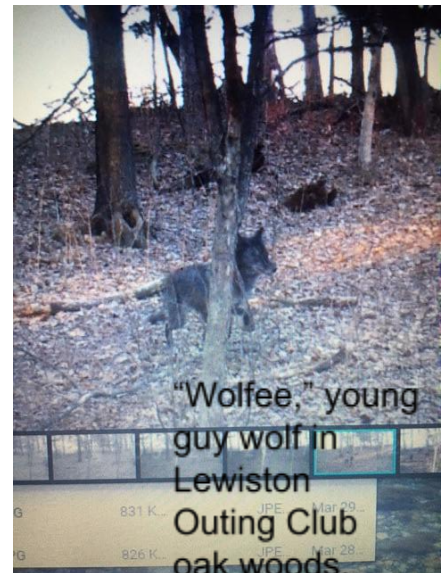
As time passed since 2003, I began to notice changes to the bog. My young children at the time through trail cameras and late evenings listening to the bog talk of wolves came to know the wolves as the “the Bog Pack.” They grew up listening late at night to the howls echoing through the tamaracks and the pictures of our numerous trail cams placed strategically to get a glimpse of the bog pack. Through the years they began to name each wolf. There was Roosevelt, Shaggy, Winston, Clyde and a young wolf pup named “wolfee.”

From my view the bog was changing with the presence of the bog pack. Our overpopulation of deer by 2015 was now under control. The ratio of buck to doe was now 50/50 and not the unsustainable 10/90. The vegetation of the bog changed, when in 2013, all of a sudden rare and endangered orchids began showing up all around. Showy lady slippers, ram’s head orchids, small white lady slippers, pink lady slippers and many more flora burst from the bog. When I showed pictures of them to a DNR biologist he thought they were from the Upper Peninsula of Michigan, as many were thought extinct from Columbia County. The out of control coyote population narrowed down to just a few. Then foxes, ruffed grouse, mink, long tailed weasels, barred owls, beaver and muskrats started to show up.

The bog pack had fixed our bog ecosystem. You could say they were the biologist. The wolves did something no human could do, fix the place to it’s oboriginal state. Biologists couldn’t believe the things I told them and showed them. I realized there is a sort of wolf envy amongst human biologists. You want something back in balance in nature, bring in the wolves and fire the biologists.



Bog Pack Tracks on Lake Corning



“Wolfee,” young guy wolf in Lewiston Outing Club oak woods.



Rare White Lady Slipper orchids thrive in the bog from the work of the eco-engineer, the grey wolf.

Time marched on in the bog, my kids ventured on to college and I continued to message them nearly daily with pictures of our wolves and the other bog creatures. The bog pack served as a conduit from my children to me. It tied us together, brought us closer. Maybe the ultimate eco-engineer also has a talent in human psychology.

In the years of 2018, 2019 and 2020 our Lewiston Bog had an over abundance of rain. The bog rose about 6-12 inches from its normal level, this pushed the bog pack out of the area to the north into Marquette County. From time to time however the wolves would show up on the trail cams, but they became less and less.

As the grey wolf was politically removed in 2020 from the Endangered Species List, I feared the worst for them. I did whatever I could to try and attract them back permanently to the Lewiston Outing Club lands. I put out wolf food, tried to improve habitat in our oak woods and generally tried to keep people away in hopes they would move back in.

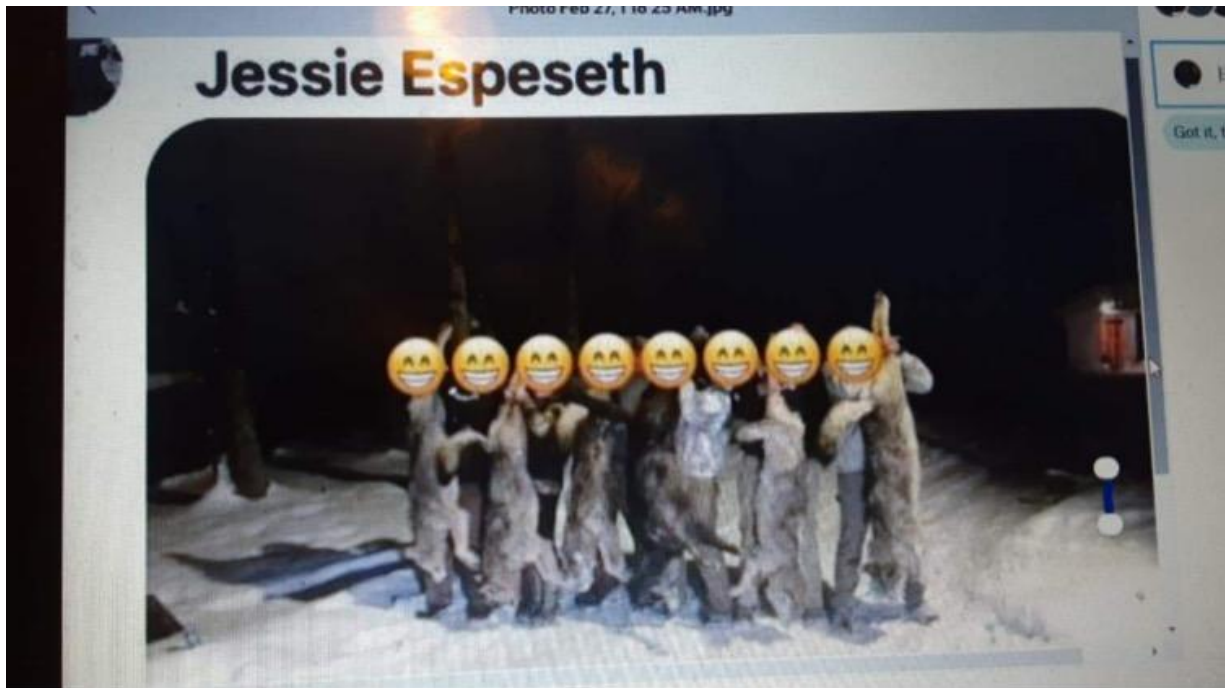


Beautiful black wolf in Lewiston woods, last seen on trail cam on 2/4/2021, before the DNR sponsored slaughter (see picture below).

In the heartbreaking February killing of 2021, our beloved bog pac was slaughtered by hounders up near a muck farm in Marquette County. Seven of nine of them were killed, even “wolfee.” A beautiful species caught up in the political insanity of selfish humans, killed by soulless hunters and their hounds and now a broken family who lost their bog pack. A wolfless bog adrift in a world of ecological mediocrity. Like someone had come to your home, killed your dog, took a few pictures and pitched the carcass into the ditch.

Now the Lewiston Bog will go back to too many deer, the orchids will retreat to the appetites of the whitetails, and the tamaracks will echo no midnight howls that gave hope to ecological balance and beauty. As for me, I permanently put away my duck calls and waders, no longer will I support an agency with no courage, constantly contradicting itself with rules and regulations against Wisconsin’s natives and I will spend my nights awaiting a midnight howl.

There should be no autumn wolf kill, a quota of zero. There should never be a wolf killed ever again. Apex predators take care of their own numbers in a perfect balance of predators and prey balanced with what the land can hold. We need more grey wolves upon the Wisconsin landscape, for only they can truly fix the land. Maybe humans can find some love in their dying heart and find peace with this great gift we have been given. Let's make the Department of Natural Resources about life and living, not death and destruction.



The participants of the February wolf kill. Shown here with our beloved bog pack. Such cowards that they didn't show their faces on social media.

Pat Clark - Member, Friends of the Wisconsin Wolf and Wildlife
N8639 Shorecrest Road
Beaver Dam, WI 53916
(920) 319-0637



National Headquarters

1130 17th Street, N.W. | Washington, D.C. 20036-4604 | tel 202.682.9400 | fax 202.682.1331
www.defenders.org

June 17, 2021

RE: Fall Wolf Season Comments

Dear members of the Wolf Harvest Advisory Committee and Wisconsin Department of Natural Resources (WDNR):

Defenders of Wildlife (Defenders) submits the following comments regarding the proposed Fall 2021 wolf harvest season in Wisconsin.

Defenders is a national non-profit science-based conservation organization with over 2 million members and supporters nationwide, including more than 28,000 in Wisconsin. Defenders was founded in 1947 and is focused on conserving and restoring imperiled species and the habitat upon which they depend. We advocate for restoration of wolf populations to ecologically and evolutionarily effective levels and distribution so that they may fulfill their natural keystone role of ecosystem regulation, supporting the diversity and health of native flora and fauna. As such, Defenders strongly supports restoration of sustainable, well distributed wolf populations in suitable habitat across the United States, including the Western Great Lakes region.

Over the last four decades, Defenders has played a leading role in the recovery of wolves across the country. We work directly with livestock owners, Native American tribes and government agencies to implement proactive tools and strategies that minimize losses of livestock to predators. These methods include sharing the cost of range riders, livestock guarding dogs, predator deterrent fencing, alternative grazing, and more. We have seen the use of proactive strategies work time and time again, saving the lives of wolves and livestock. We have also seen that it is easier to learn the behavior and movements of stable packs, which increases the odds of avoiding conflicts.

We are therefore deeply concerned about the health of the wolf population in Wisconsin following the appalling outcome of the February hunt - 218 dead wolves, nearly 20 percent of the state's estimated 1,000-plus wolves. We understand that 73% of the wolves were killed in their core habitat on public land, where conflicts with people and livestock are rare. Killing wolves from established packs can disrupt the social cohesion of the pack and, as WDNR data shows, there was a notable uptick in depredations following the February hunt.

The full impact of the February hunt on the wolf population is not yet known. Critical data on pack disruption, pup survival, number of illegal kills and number of wolves killed but not recovered is missing. Though it is currently unknown how many pregnant wolves were killed in the February hunt because hunters were not required to submit carcasses for inspection, it is projected that the majority of Wisconsin's wolf packs will not produce pups this year.

While we understand that an outdated law requires WDNR to hold a fall wolf hunting and trapping season when wolves are not federally listed, we urge WDNR to exercise its authority to prevent the unprecedented slaughter that occurred in February from occurring again in November by regulating the

quota, form, hunting hours, timing and methods allowed. **Hunting and trapping practices that will have negative impacts on the long-term health of Wisconsin's wolf population must be prohibited.**

Specifically, we urge WDNR to ensure the following:

1. The precautionary principle must be exercised when setting a quota to prevent more harm to Wisconsin's wolf population. Since it won't be possible to fully assess the impact of the breeding season hunt on the distribution and abundance of the wolves until annual surveys are completed, a quota must take into account the potential impact of the February hunt on the wolf population. Quotas established for zones within core wolf habitat should be exceedingly conservative.
2. Wolf harvest licenses must be strictly limited, as with other target species, and must be zone-specific licenses to allow for better control of the number and location of wolves killed.
3. Stable wolf packs must be protected. Blanket and disorganized hunting of stable and established wolf packs can create disruptions that lead to increased conflicts with people and livestock.
4. Only hunters with a wolf harvest permit should be allowed to participate in a hunt. Unlicensed hunters should not be allowed to participate in any way. Clear limits on the size of hunting parties must be established and enforced to stop the formation of large hunting groups.
5. Hunters should be required to report wolf kills to WDNR no later than 12 hours after harvest to provide real-time data about the number of wolves killed. Carcasses must be submitted for registration in person.
6. To the extent possible, hunting of wolves using dogs must be prohibited, or at the very least, significantly limited. Wisconsin is currently the only state that allows the use of dogs to hunt wolves. Hound training on wolves during the wolf harvest season must be prohibited.
7. Night hunting of wolves must be prohibited. Wolf hunting at night is highly destructive to people living in the area and increases the likelihood of illegal poaching activities.
8. Hunting and chasing wolves using motorized vehicles, such as ATVs and snowmobiles, must be prohibited.
9. The use of animal carcasses, especially livestock carcasses, as bait to lure wolves must be prohibited.

Lastly, given that the February hunt took place without considering traditional input from stakeholders, including the legally required consultation with tribal governments, we sincerely hope that our comments and that of others will be given due consideration. We hope WDNR will take critical steps to prevent a repeat of the highly destructive and chaotic February hunt.

Thank you for your consideration.

Sincerely,



Serda Ozbenian
Senior Manager, Field Conservation

Wisconsin Department of Natural Resources
101 S. Webster Street PO Box 7921
Madison, WI 53707-7921

May 14, 2021

Re: Fall 2021 Wolf Hunt and Management Plan

I hereby submit these comments on behalf of Animal Wellness Action, the Center for a Humane Economy, Animal Wellness Action and SPCA International and our many supporters in the state of Wisconsin in response to the Department of Natural Resources (DNR) proposal to allow for wolf hunting to take place in Wisconsin starting in the fall of 2021. Our organizations are dedicated to the protection of wildlife and the sound, science-based management of all of our vital natural resources, including threatened wolf populations across the country.

We understand from your website and published articles that DNR is in the process of updating the state's badly outdated wolf management plan. We believe that, as trustees of all state natural resources, including wildlife such as wolves, DNR is obligated to ensure that wolf populations are secure and that any forthcoming management planning is conducted in a manner that is thoughtful and thorough and designed to uphold the state's public trust obligations to all of its citizens, and not only those who seek pleasure from the killing and cruel maiming of animals.

As an initial matter, submitters note that the Trump administration's delisting decision that was hurried out in its waning months to end protections for endangered gray wolves in the United States was fundamentally flawed and will undoubtedly be turned back by the courts, as so many prior attempts to delist wolves have failed. Indeed, one of the underpinnings of the federal government's delisting decision was its reliance on adequate state management programs to responsibly protect and manage wolf populations in lieu of federal protections. With the February 2021 wolf hunt fiasco, Wisconsin has proven that the federal government's

trust in state programs was clearly ill-founded. Wisconsin's efforts to hurriedly implement more killing of this species in the gap between the illegal delisting and its inevitable reversal is as ill-advised and irresponsible as the delisting was itself.

DNR must take steps to try and repair the immeasurable damage to its reputation and credibility it has suffered with the disastrous February hunt that resulted in an extreme and unwarranted excess of wolf kills over the quota recommended by DNR and adopted by the Natural Resources Board (NRB). What happened in the last hunt was such an affront to sound science and proper management measures that it raises significant questions as to whether the state is capable of properly managing hunts in a humane and conservationally secure manner. Although the Governor admitted that "DNR was forced to develop harvest quotas without the usual input and science-based research it would have used had more time been available," the fact is that DNR was under no legal mandate to set the hunt quota at the number it did; it could simply have set a quota of one and still have met its arguable legal obligation. It was DNR's reckless action's in needlessly setting a high quota of 200 wolves statewide that directly spurred a 60-hour killing spree that resulted in the deaths of at least 216 wolves, exceeding the 119-kill limit allocated outside of tribal lands by 82 percent. We hope that DNR will take steps in this current management planning process to ensure that these mistakes are not repeated.

Wolf populations and the role wolves play in our ecosystem are extremely complex issues. Any management plan and proposed quota for future hunts will need to consider a number of factors that implicate wolf pack health and population security. Indeed, should DNR conduct the type of thorough plan formulation that is required to meet defensible standards, no management plan could possibly be finalized in time to inform a fall 2021 hunt.

Wolves still face urgent, imminent, and cognizable threats to their populations. Despite the illegal federal delisting from the Endangered Species Act, they are not recovered. Wolves number only slightly more than 5,000 across their range in the lower 48 states, and they face a panoply of threats. In short, human persecution of wolves continues across their range in the form of state-sanctioned killing.

Wolf populations are fragmented across so much of their range, even in Wisconsin, with many small populations isolated by roads, railways, farms, and other human developments, structures, or alterations of the landscape. Wolves face meta-population threats from large-scale trophy hunting and recreational trapping programs like those authorized by DNR back in February. They are subject to extensive damage control killing by federal and state authorities with agriculture and wildlife agencies while facing heightened risks as they come into contact with human settlements and livestock grazing operations that intrude on the canids' historical range and trigger even more damage-control complaints that produce substantial body counts. Wolves face direct mortality from poaching and incidental killing by traps or poisons set out to kill coyotes or other mid- or large-sized mammals.

Wolves also face the effects of rapid climate change, which, for example, has depleted moose populations in their southern tier of their range (which overlaps with much of the wolves' range in the northern reaches of the lower 48 states). White-tailed deer populations are threatened by Chronic Wasting Disease in a number of states, including Wisconsin, partly because of thousands of captive farms, where proprietors raise these wild animals for meat, velvet, and fee-based hunting, that are incubators of this brain-wasting disease (wild deer interact with the captive populations through fence lines and contact and further spread the disease, which is always fatal to the animals).

Wolves are also the victims of retribution killing and other forms of poaching and auto, truck, or train collisions. The scientific literature and anecdotal reports underscore the effect of inter-pack rivalries and aggression that result in deadly encounters. As a predator often killing prey who are physically larger and possessed with an array of defensive features, including sharp hooves and multi-pointed antlers or horns, wolves sustain injuries and even death during some hunts. Like other mammals, they face a risk of disease and an array of other mortality factors.

As we've seen at Isle Royale National Park, they are threatened with the effects of inbreeding as a result of population isolation, resulting in debilitating conditions, such as curved spines or other deformities, that diminish their ability to chase and kill large prey. In short, while wolves

have the ability to reproduce, survive, and thrive, just maintaining populations in a human-occupied landscape is an uncertain proposition, given the perils they confront every day.

In the past, the Great Lakes states pledged a five-year moratorium on hunting and trapping of wolves after delisting, but abandoned that pledge when the animals had federal protections taken away some years ago. In fact, after past attempts at federal delisting, Wisconsin, as it is now with this current delisting attempt, rushed to institute trophy hunting and commercial trapping programs for wolves—exposing them to random killing for the first time in more than 40 years. Minnesota and Wisconsin especially authorized some of the most abusive and unsporting practices, including hound hunting, snares, baiting, electronic calls and the use of leg hold traps, producing a body count well past 1000 animals over two hunting seasons. Wolf numbers declined in every state—with Wisconsin alone losing 17 family units in just three seasons, a fifth of its total wolf population just through hunting and trapping.

One of the most abhorrent features of the latest DNR-sanctioned hunt in Wisconsin last February was the use of packs of domesticated dogs to hunt down and kill wolves with 86 percent of reported wolf kills achieved with the use of dogs. Wisconsin is the only state that allows the use of hounds to hunt wolves. Although your agency claims that dogs may only be used for tracking, and not killing, purposes, that position is a fallacy that ignores the simple, inevitable fact that dogs who are tracking wolves will end up fighting, killing and being killed in the process.

Wisconsin hunters took full advantage of this barbaric animal fighting practice. But that should come as no surprise—when dogs used to hunt wolves get killed, the state sends a check of \$2,500 to the hunters who purposely place these domesticated animals in harm's way. Since the program was implemented the state has paid out over \$900,000 in taxpayer money to hunters who cared as little for their own dogs as they do for the lives of endangered wildlife.

DNR and the NRB have demonstrated an ongoing failure to act with restraint in the face of federal delisting, invoking powerful evidence that state-based safeguards are not in place to maintain wolf populations in the states where they reside. Some of the policy makers in the

states are inordinately influenced by a small but influential segment of the population with a barely contained hatred of wolves, with the individuals exhibiting irrational human behavior and a lack of understanding about the wolves' very modest impacts on livestock or their beneficial impacts on ecosystems. These retrograde attitudes combine to create a dangerous and toxic political atmosphere for wolves that continues to be a very practical threat to their survival.

What we have learned, even with the modest populations that inhabit our nation, is that wolves bring extraordinary ecological benefits to ecosystems. Dozens of world-renowned wildlife biologists and scientists have attested to these benefits in writing to Congress and to the USFWS. Wolves play a critical role in their native ecosystems, as anyone who has watched the powerful documentary *How Wolves Change Rivers* can attest. Biologists in Yellowstone have found that wolves move sedentary deer and elk populations from overgrazed areas, enabling aspen and willow to reclaim ground for the first time in more than half a century.

With the help of beavers, wolves have restored streams and reduced flooding and bank erosion. In Yellowstone, restored streams have attracted more plants, songbirds, water-wading birds, and moose. Wolf predation helps maintain healthy deer populations, lowering the frequency of deer-auto collisions and the prevalence of crop losses. They cull weak, old, and sick animals from populations and mitigate browsing on vegetation and bringing great vitality to the entire ecosystem. This has the potential to save human lives and tens of millions of dollars for the states.

Wolves also play an additional role in our economy. Thousands of people have been drawn to Michigan's Isle Royale National Park because of the lure of the storied predator-prey, wolf-moose relationships. The International Wolf Center in Ely, Minn. contributes \$3 million to the local economy annually. Annual visitor spending has increased by \$35.5 million since the reintroduction of wolves in the states surrounding Yellowstone National Park. The public would rather see wolves celebrated than cut down in their tracks.

Many polls show Americans want wolves restored to the American landscape and conserved for future generations. And although some wolves do occasionally prey on livestock, it's minimal.

Wolves kill account for between just 0.1 percent and 0.6 percent of all livestock deaths. And of all of the world's top predators, they are among the least threatening to human beings –with no documented attacks by healthy, wild wolves on people in the lower 48 states in the last century. A relatively recent 25-year Washington State University study found that indiscriminate killing actually increases the tendency of wolves to prey on livestock, in part by breaking up stable wolf packs and allowing younger, less dominant animals to start breeding and expanding into new territories.

Wolves are an economic and ecological boon, promoting tourism, providing a check on prey populations, and strengthening the vigor of the ecosystems in which they live. They are not the rapacious species that their critics caricature. Their depth of their misunderstanding of wolves is on par with their overly optimistic reading of their current state of population health. It is premature to remove federal protections for wolves, and we urge the agency to consult the science and to look to application of ESA as articulated by the federal courts in their prior

While some states, like Wisconsin and Idaho, have taken full advantage of the short lapse in federal protection to launch an unjustified slaughter of wolves in their respective states, officials in some of your neighboring states have indicated that they are willing to step up to do their share to continue to protect the species. Minnesota's Governor Walz has signaled that he supports a ban on wolf hunting in his state, while Michigan's Attorney General Nessel has also expressed opposition to the federal effort to drop protections for gray wolves. Having Wisconsin join those states will provide a critical, contiguous safe haven for wolves in the Great Lakes region and would allow for stable populations while we and others work to restore federal protections across the country.

When Wisconsin last left wolf populations without protection, from 2012 to 2014, hunters in your state killed hundreds of wolves using horribly inhumane practices like body gripping traps and neck snares. More than half of the wolves killed were pups. The February 2021 added to the inexcusable actions that the state has taken when faced with federal delisting. Now is not the time to repeat that travesty and allow for more of the same. It was premature to remove federal safeguards for wolves, and it would be likewise irresponsible to allow for a wolf hunting

season to commence in Wisconsin in the fall with the temporary cessation of federal protections. We ask for your help in ensuring that this doesn't happen.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Edwards". The signature is fluid and cursive, with the first name "Scott" and last name "Edwards" clearly distinguishable.

Scott Edwards
General Counsel
Animal Wellness Action

WOLVES: THE WISCONSIN RURAL PERSPECTIVE
Author: Laurie Groskopf, Tomahawk, WI

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WOLVES: THE WISCONSIN RURAL PERSPECTIVE

SUMMARY

Wolves: The Wisconsin Rural Perspective, is the first survey measuring public opinions about wolves in exclusively rural areas of the state. These Towns are: Hansen, Wood Co., Russell, Lincoln Co., Maple, Douglas Co., and Alvin, Forest Co. A control Town, Richwood, Richland Co., was chosen to determine differences and similarities in opinions.

The survey is brief – two questions – with an additional item measuring respondents' exposure to wolves and knowledge of conflicts.

In the four Towns surveyed with wolf presence, 69.6% of respondents wanted less wolves in Wisconsin. In the control Town of Richwood, Richland Co., 46.7% of respondents chose "less wolves" in Wisconsin.

When asked their opinions about a potential wolf goal in Wisconsin, the most frequently selected option in the 4 wolf occupied towns was "350", "350 or less", or "less than 350" (55). The second most popular wolf goal in those 4 towns was "zero". Forty-five respondents chose this goal.

I began this project wondering about the differences I might discover in towns with varying amounts of time, different habitats, and intensity of conflict between wolves and humans. As it turned out, I am more impressed with the similarities and rather unified opinions about wolf management.

"Each time the proposed delisting has been blocked in court by protectionist groups arguing legal technicalities. This continued full protection for flourishing wolf populations creates a real problem, not only for farmers and ranchers, who are generally hostile to wolves, but also for the wolves themselves. Because when wolves proliferate where they conflict with people, they will be killed – legally or notWeenvisioned that once recovery had been met, the wolf would be delisted and where necessary, their numbers Controlled, like those of bears, deer, geese, and other wildlife." Wolf Island: Discovering the Secrets of a Mythic Animal L. David Mech, with Greg Breining. U. of MN Press, 2020.

BACKGROUND

Early wolf recovery in WI paid no attention to the social acceptability of wolves. Management decisions were focused on recovery of wolves, and it was believed by state managers that wolves would only live in large blocks of public land with little to no human presence. The concept of social acceptability as it relates to wolf numbers was not on the radar.

Studies of public attitudes towards wolves were small-scaled questionnaire-based studies (Nelson & Franson, 1988; Wilson, 1999, Schanning 2009). The results of these surveys showed support for wolf expansion. Some samples may have been biased. Schanning chose a representative sample, but had a very low return rate of less than 20% (source, unpublished preliminary draft DNR wolf management plan 4/10).

In 2001, Adrian Treves and others began a “Longitudinal Analysis of Attitudes Toward Wolves”. Different samples were used for each stage, 2001, 2004, 2009, but some continuity in sampled respondents allowed for Treves to follow people’s attitudes towards wolves over time. “Over time, 656 respondents increased agreement with statements reflecting fear of wolves, the belief that wolves compete with hunters for deer...and inclinations to poach a wolf.” These studies took place between 2001 – 2009, when Wisconsin’s minimum wolf count rose from 257 to 655. “Over time residents living in the range of Wisconsin’s gray wolf became less tolerant of wolves.” (Source, Conservation Biology, 2013) (Wisconsin Wolf Policy Survey: Changing Attitudes 2001 – 2009, Adrian Treves, Lisa Naughton, Tory Shelley)

A Wisconsin DNR study of public opinion released in 2014, in preparation for the second attempt to revise the 1999/2007 approved wolf plan, sampled 8750 addresses in Wisconsin with oversampling in wolf range. The study assumed that people with addresses in wolf areas would have had a greater exposure to wolves. “...human interactions should be more frequent in places where wolves occupy more space (with more wolves) and/or where there are more human settlements...To the extent that these assumptions are true, we expected to see some differences in the social carrying capacity of wolves across its Wisconsin range.” (Public Attitudes Towards Wolves and Wolf Management in Wisconsin August, 2014, WI DNR)

For the sample areas identified as “wolf range” in Wisconsin’s study, respondents self-identified as “rural” or “urban”. The rural/urban split was one method used to analyze data. Opinions were split, with 40% of rural wolf country respondents rating their feelings towards wolves as unfavorable or very unfavorable, 22% neutral, and 38% favorable or very favorable. When it came to questions about how many wolves should reside in the state, 47% of rural wolf range residents wanted fewer or none, 24% wanted the same number, 16% wanted more or many more. The wolf minimum count was 809 while this survey was done.

Another method of wolf range data analysis consisted of large groupings of counties into one cluster. For example, one cluster was Bayfield, Ashland, Sawyer, Iron and Price Counties. Cluster data did not separate urban and rural, so may not reflect the most important population, rural residents, who interact more freely with wolves. In the above cluster of counties, 46% of respondents (rural and urban) indicated they wanted to see the wolf population decreased or eliminated in their county. 32% were in favor of the same number of wolves, and 11% wanted an increase in their county.

In another cluster – Burnett, Washburn, Rusk, and Taylor Counties – 50% of respondents wanted a decrease or elimination of wolves, while 31% wanted the same number (809 at the time) and 9% wanted an increase in wolf numbers.

This most recent study done by DNR staff noted the department and wolf advisory committee were particularly interested in "...the opinions of people living among wolves, especially in the rural areas, because those residents are most likely to encounter wolves and be impacted by them. People who are the most impacted by wolves are also the ones whose acceptance and cooperation are most needed to ensure continued success with management efforts." Sample selection and the method of reporting findings may not have captured the rural voice.

In late 2020, preparing for delisting, Minnesota completed research on public attitudes for their new wolf management plan. "Minnesotans' Attitudes Toward Wolves and Wolf Management" (Summary Report) U. of MN, MN DNR, MN Cooperative Fish and Wildlife Research Unit, Dept. of Fisheries, Wildlife and Conservation Biology, Schroeder, S.A, Landon, A.C., Cornicelli, L., McInenly, L. & Stark, D. 2020) targeted three groups in MN. These were: the general population 18+, sample 5250; Minnesota livestock farmers in counties within wolf range, sample 2500; and MN deer hunters 18+, sample 2000. These respondents were mailed surveys based on addresses with four follow up reminders.

Residents responded at 33%, deer hunters at 47%, and livestock farmers at 53%.

Livestock producers in wolf range were negative towards wolves at a rate of 62.2%. Their preference for a wolf population of "0", fewer or many fewer was 72.2%. Their preference for wolf range was none, much less, or less at a rate of 65.6%.

Deer hunters, a statewide sample, were negative about wolves at a rate of 51.5%. Their desire to see wolf numbers reduced to fewer, many fewer, or zero was 59.8% of respondents. They wanted wolf range of none, less, or much less at 48.3%.

The general MN population had a different outlook. Only 19.6% of residents had a negative view of wolves. Only 14% wanted a wolf population of zero, less, or many less. As for wolf range reductions, 11.1% wanted no range, less or much less.

This survey mirrors public opinion surveys in many areas of the world. Where people have little experience or exposure to wolves, attitudes are more positive. In cases where people have direct exposure to wolves and live near them, attitudes are much less positive.

In "On Wisconsin", a publication of the University of Wisconsin Alumni Association, Fall, 2009, Volume 110, Number 3, an article called "Wolves at the Door" by John Allen appeared. The article examined the opinions of UW faculty wondering how many wolves the state should have. "If you look at the habitat wolves currently occupy, it's not all good quality", according to David Mladenoff, Ph.D., the professor who first did population modeling of the landscapes in Wisconsin that could support wolf recovery. The article continues "And in the poorer-quality areas, the wolf population 'probably isn't sustainable'. The single most important habitat attribute which promotes successful wolf territory is lack of roads (and its companion, lack of people)." The article goes on to say both Mladenoff and Van Deelen, another UW professor

who has worked on wolf population modeling, believed in 2009 that the days of rapid multiplication may be coming to an end. In 2009, Van Deelen figured that 1300 wolves between MI and WI would be the maximum.

All these numbers and the vague concept of biological carrying capacity do the wolves no favors. The real importance of social carrying capacity is crucial to understanding wolf management. And keep in mind, no sensible person would advocate for wolves to be held at biological or social carrying capacity, because that implies we are willing to risk the wolves themselves and peoples' good-will towards wolves, by standing at the precipice.

METHODOLOGY

A study of true rural attitudes towards wolves was needed. This has never been done in Wisconsin.

Five rural Wisconsin Towns were chosen for this study. These Towns were not chosen randomly, but rather for their attributes. Attributes considered were the truly rural nature of each Town, length of time wolves had occupied the Town, and degree of conflicts experienced. Variation between towns was intentional to capture possible differences. The most important variable impacting the success of wolves is human population density. Previous research proves the more remote regions without human presence create optimal locations for wolves.

According to L. David Mech, in a keynote presentation at the October, 2018 International Wolf Center International Wolf Symposium 2018, in areas without human presence, wolves are the primary cause of wolf mortality. In human dominated landscapes, humans are the primary cause of most wolf deaths. The Towns chosen have varying degrees of human density, but all are without any significant settlements. The human density per square mile of territory is included in each Town description.

These five Towns chosen for this survey are: Town of Hansen, Wood Co., Town of Maple, Douglas Co., Town of Russell, Lincoln Co., Town of Richwood, Richland Co., and Town of Alvin, Forest Co. All Towns were chosen because they lacked cities or villages of any major size. This was needed to avoid areas where people have had little opportunity to interact with wolves.

The Town of Hansen in Wood. Co. (human population density 19.5/sq. mi.) has a mixed landscape of small farms and forested areas. Hansen straddles two wolf management zones, zone 5 which is considered by the department to be optimal wolf habitat, and zone 6, which is unsuitable wolf habitat. Some large public land is nearby, but Hansen is mostly private owners of small, sometimes agricultural, parcels. Wolves have occupied this area for about 10 years and have been a major source of conflicts recently, mainly with livestock, but also pets.

The Town of Maple in Douglas Co. (20.2/sq. mi. human density) has the longest history with wolves, well over 25 years. The landscape is mixed farming and rural residences, and the Brule River State Forest. Chronic problems and conflicts with wolves have been the experience of

this Town. Maple is located in Wolf Harvest Zone #1, considered primary wolf habitat by the WI DNR.

The Town of Russell in Lincoln Co. (18.7/sq. mi. human density) is a mixed landscape of forested areas and farms. Most of Russell is smaller private lands, with some agriculture present and a few public access areas of county forest and state fishing areas. Wolves have occupied this area for over 20 years, but have increased their presence for the past 10 years. Very few documented conflict incidents have occurred. Russell is located in Wolf Harvest Zone #4, considered to be sub-optimal or marginal wolf range.

The Town of Richwood in Richland Co. (14.5/sq. mi. human density) is located in the SW portion of the state in the driftless area. While very few wolves have been present in this area, and few problems have been verified, a control Town was needed to represent an area where wolves probably could live, but have not established permanent residence as of yet (as determined by DNR wolf tracking methods). Most of Richwood is private ownership. Richwood is located entirely in wolf harvest zone 6, which is considered unsuitable wolf habitat. But some advocate for allowing the establishment of wolves in areas such as this with a very low human density.

The Town of Alvin in Forest Co. (1.3/sq. mi. human density) was originally not part of the sample. But I had left over materials and wanted another wolf harvest zone represented. Alvin is quite different than the other sample towns because it is almost entirely lacking agriculture, and contains mostly USFS National Forest lands. Being located in Wolf Harvest Zone #2, it represents what the DNR classifies as optimal wolf habitat.

The survey sample was obtained from voter registration lists provided by county or town clerks. Using voter lists avoided return as undeliverable surveys common in address-based mailed surveys. Undeliverables were very low.

Sampling within each town was completely random, with every-other name selected and mailed the survey (see appendix to view the survey). The recipient also received a self-addressed, stamped envelope to return the survey. The mailing was the only contact with each respondent, except for a few that called to get more information and one who sent the survey back from the control Town stating that it was inappropriate as no wolves live there. I sent a personal communication back, since the person included their name and address explaining the concept of having a control town.

The survey was designed to be very simple, short, and not a burden for the recipient. This was primarily because many respondents will throw away a long survey. Also, context laden terms and questions used in previous surveys probably caused certain types of respondents to become frustrated or interpret the questions as invasive or leading the respondent. For this reason, the survey contained some brief, factual information followed by simple choices for the respondent to circle or write numbers. A "no opinion" option was also included. The respondent was given the opportunity to write notes, which are included as an appendix.

The total sample is approximately 9% of the recent survey sample for the entire state of MN. The sample used is 10% of the last mailed WI public opinion survey in 2013.

RESULTS - Response rates

The sample:

Town of Hansen:	247 minus 1 undeliverable = 246
Town of Russell:	208 minus 7 undeliverable = 201
Town of Maple:	241 minus 4 undeliverable = 237
Town of Richwood:	159 zero undeliverable = 159
Town of Alvin:	65 minus 3 undeliverable = 62
TOTAL SAMPLE	905

The sample consisted of every other name on the registered voter list obtained from the county clerk or the town clerk. The response rates for the five towns were quite good, considering this was a one-time contact from an unknown source. The five towns responded as follows:

Town of Hansen, Wood Co.: total sample 247 minus one undeliverable = 246; response from 119 = 48.4% responded.

Town of Russell, Lincoln Co.: total sample 208 minus 7 undeliverable = 201; response from 79 = 39.3% responded.

Town of Maple, Douglas Co.: total sample 241 minus 4 undeliverable = 237; response from 99 = 41.8% responded.

Town of Richwood, Richland Co.: total sample 159; response from 60 = 37.7% responded.

Town of Alvin, Forest Co.; total sample 65 minus 3 undeliverable = 62; response from 22 = 35.5% responded.

RESULTS – Less, Same, More, No Opinion

The survey questions asked whether the respondent wanted less wolves in Wisconsin, the same number of wolves in Wisconsin, more wolves, or had no opinion. (see full survey of 1 page)

Town of Hansen: Less Wolves 76.4%; Same Wolves 10.9%; More Wolves 2.5%; No Opinion 6.7%. There were also 4 surveys where results were contradictory. These included: 1) the selection of “same” but a quota suggested at 400, which would be less than current. 2) two surveys where the respondent selected “more wolves” but indicated a preferred goal of “0”, and 3) one survey selected “more” wolves but indicated a goal of 200. Inconclusive results totaled 3.4% of the total.

Town of Russell: Less Wolves 63.3%; Same Wolves 15.2%; More Wolves 5.1%; No Opinion 11.4%. Inconclusive 5.1%. For these inconclusive surveys, two surveys selected “More Wolves” but wrote a recommended goal of “0”, one survey selected “More Wolves”, but recommended a goal of 350, and one survey selected “More Wolves”, but recommended a goal of 20.

Town of Maple: Less Wolves 65.7%; Same Wolves 11.1%; More Wolves 7.0%; No Opinion 12.2%, inconclusive 4.0%. Three inconclusive surveys selected “More Wolves” but recommended goals of 300 – 500, 100, or 350+. The fourth circled “no opinion” but wrote statements indicating fear and worries about conflicts.

Town of Richwood: Less Wolves 46.7%; Same Wolves 13.3%; More Wolves 10.0%; No Opinion 25.0%; inconclusive 5.0%. One survey questioned why Richwood was in the sample. I returned a response to this individual since he gave me his contact information, explaining that Richwood was the “control” Town because it was by some people’s judgement suitable wolf habitat, but had experienced little presence of wolves. Another inconclusive circled both “less” and “same”. A third selected “more wolves” but wrote a management goal of 500.

Town of Alvin: Less Wolves: 72.7%; Same Wolves 9.1%; More Wolves 13.6%; No Opinion 4.5%. All surveys were valid.

TOWN	LESS	SAME	MORE	NO OPINION	?
HANSEN	76.4%	10.9%	2.5%	6.7%	3.4%
RUSSELL	63.3%	15.2%	5.1%	11.4%	5.1%
MAPLE	65.7%	11.1%	7.0%	12.2%	4.0%
RICHWOOD	46.7%	13.3%	10.0%	25.0%	5.0%
ALVIN	72.7%	9.1%	13.6%	4.5%	0

RESULTS - PREFERENCE FOR STATEWIDE WOLF GOAL

Respondents were able to note their ideas about the state wolf goal. The results are as follows:

Hansen - Less wolves (91)

Goal of zero – 21

Goal of 350 – 17

No opinion – 14

300 – 5

400 – 4

Less than or equal to 350 – 4

200 – 4

100 – 3

500 - 3

Less than now - 2

275, 125 -150, 200 or less, 250, 50 – 150, less than 100, 0 – 500, 50, 150, 0 – 100, 0 – 200, 20, 450 – 650, 600 – Each received one vote (total 14).

Hansen same # wolves (13)

No goal – 9

1000 – 3

500 – 1000 – 1

Hansen more wolves (3)

None had any opinion on a goal

Hansen no opinion (8)

None had any opinion on a goal

Russell – Less Wolves (50)

Goal of Zero – 12

Goal of 350 – 11

No opinion – 11

Less – 2

500 – 2

100 – 2

0 – 350, 600, one, minimum, 350 – 500, 200, 250, 550, 850, 999 – each received one vote (10)

Russell – same wolves (12)

No opinion - 6

1200 - 2

1000 – 2

1034 – 1

400 – 1

Russell – more wolves (4)

No opinion – 3

2000+ - 1

Russell – no opinion (9)

No opinion – 8

350 – 1

Maple – Less Wolves (65)

350 – 16

Zero – 8

200 – 4

500 – 3

100 – 2

300 – 500 – 2

300 - 2

<350, 250 – 350, 500 – 700, 400, 700, <100, 1000, 450, 150, 800, small - all received one vote (11)

No opinion – 17 (chose “less” or no entry)

Maple – same wolves (12)

1200 – 2

800 – 1000, 1000, 1195 – 1 each

No opinion – 6

Maple more wolves (7)

1500 – 2

1200+ - 2

1400 – 1600 - 1

No opinion – 2

Maple no opinion (12)

Richwood – Less Wolves (28)

Zero – 8

350 – 6

500 – 3

144, 250, 0 – 50, 200, 350 or less, 700 – 900, 100 all received one vote (7)

No opinion - 4

Richwood - same wolves (8)

1034 – 2

1200 - 1

900 – 1

No opinion - 4

Richwood – more wolves (6)

1200 – 1

1500 – 1

No opinion - 4

Richwood - No opinion (15)

Alvin – less wolves (16)

300 – 350 – 5

Zero – 4

350 or less, 250 – 350, 350, 100 or less, 500+ - each received one vote (5)

No opinion - 2

Alvin – same wolves (2)
1200 – 1
No opinion - 1

Alvin more wolves (3)
1500 – 1
1000 – 1
No opinion - 1

No opinion (1)

RESULTS - EXPERIENCE WITH WOLVES AND KNOWLEDGE OF CONFLICTS

Within groups that chose “less”, “same”, “more” and “no opinion”, varying degrees of knowledge and experience existed. There may be some duplication in responses as a person could have checked a level of experience and a level of knowledge of conflicts on the same survey. Some examples of how experience related to choices are listed below.

Town of Richwood - of the eight people who selected “zero” for a wolf goal, 7 had no direct experience with wolves. Fourteen of the people who wanted “less” wolves also had no experience with wolves. Richwood by far had the most surveys indicating no experience with wolves (34). It also had by far the most people with “no opinion” (24.5%) over twice the other towns. Of the 15 who had no opinion, 12 had no experience with wolves and none indicated they knew of any conflict situations in their area.

There is a large difference in respondents indicating they have no opinion between the 4 towns with wolf presence and the town with little wolf presence (Richwood). One quarter of Richwood folks had no opinion, while the other towns had largely made up their minds, with Hansen at 6.7% no opinion, Alvin 4.5% no opinion, Russell 11.3% no opinion, and Maple 12.2% no opinion. Once people’s attitudes are formed, it is difficult to change minds.

In Maple, 7 of 12 selecting “no opinion” had no experience with wolves and were unaware of any conflicts. Of Maple residents who wanted “less wolves”, 50 had some or a lot of experience with wolves and only 3 had no experience.

Of the Russell residents who wanted “less wolves” only 4 had no experience with wolves while 40 had some experience or a lot of experience, and 25 were aware of conflicts. This is an area where few documented conflicts have occurred.

Town of Hansen – of the 91 respondents who wanted less wolves, only 2 had no experience with wolves. Forty-two had experienced multiple contacts with wolves, wolf tracks, howling, or a combination of these. Seventy indicated they were aware of conflict situations that had happened to them, their family, or other residents in their town.

In Alvin, all respondents had some experience with wolves or awareness of problems except two who chose “less wolves” for their preference.

In general, the choice of more wolves or no opinion was associated with no experience with wolves. In Hansen 2 of 3 wanting more wolves had no experience with wolves, and ½ (4 of 8) with no opinion had no experience with wolves. Russell was similar with ½ the “more wolves” group having no experience and 4 of 9 “no opinion” having no experience. Of these two choices, only one was aware of conflicts in their Town.

DISCUSSION

The general results of these five rural towns indicate a high level of desire to see the wolf numbers reduced. The most popular goal number in Russell, Richwood, and Hansen was zero. In Maple and Alvin, the most popular goal was 350, the current goal. 350 rated highly in every Town, coming in second in Hansen, Russell, Richwood. Zero for a goal rated second in Maple and Alvin. These numbers indicate a high level of support by rural people for wolf population controls, even in areas where wolves have not been active, and even in areas the department considers to be prime wolf habitat.

As in many other surveys, this rural opinion survey again documents that experience with wolves and knowledge of conflicts decreases acceptance of Wisconsin’s wolf management.

What happens when the general population in wolf areas does not support the current program? That question is not within the scope of the current survey. However, as previously noted, experts throughout the years and world-wide recognize that for a wildlife management program to be successful, the people most directly impacted must be in support of the program. In spite of Wisconsin boasting of its wolf management success, these results do not support that concept as legitimate. More wolves does not = a better wolf management program. Quality of life counts more.

What do the wolves want out of life? I posed this question to a high level DNR manager. It was obvious that he never had considered this question. Do the wolves want to inhabit marginal or unsuitable territories? Do they want to be forced, by uncontrolled numbers, to occupy substandard territory and as a price, suffer the human-caused mortality that all experts agree accompanies occupation of human-dominated landscapes? These are questions I hope this research helps explain.

A former, well-liked wildlife manager in my area who retired was quoted in the newspaper giving this advice: “If the people don’t like what you are doing, it won’t work.” The people directly interfacing with wolves are the most important in implementing wolf management. Just ask the wolves.

THIS SURVEY IS BEING DONE TO ASSESS RURAL ATTITUDES TOWARDS WOLF MANAGEMENT IN WISCONSIN. *All numbers are minimum at the lowest point in the wolf population.*

1. THE CURRENT MINIMUM NUMBER OF WOLVES IN WISCONSIN, DETERMINED BY THE WI DNR COUNT WINTER 2019 – 2020, WAS 1034. USING A NEW STATISTICAL POPULATION MODEL, THE WI DNR ESTMATES THE MOST PROBABLE NUMBER OF WISCONSIN WOLVES AT THE LOWEST POINT IN THE POPULATION IS AS 1195 (winter 2019 – 2020). Please select your preferred wolf management option:

LESS WOLVES SAME NUMBER OF WOLVES MORE WOLVES NO OPINION

2. THE WI DNR WOLF MANAGEMENT PLAN, CREATED IN 1999 AND REVISED IN 2007, APPROVED A WOLF MANAGEMENT GOAL OF 350 WOLVES. THIS NUMBER WAS SURPASSED IN WISCONSIN IN 2004. Please share your preferred wolf management goal or select no opinion:

PREFERRED MANAGEMENT GOAL OR RANGE OF NUMBERS: _____ NO OPINION _____

TO UNDERSTAND YOUR EXPOSURE TO WOLVES, PLEASE SELECT ANY OF THE FOLLOWING TO DESCRIBE YOUR EXPERIENCE WITH WOLVES:

_____ I HAVE NO EXPERIENCE WITH WOLVES

_____ I HAVE SEEN A WOLF, TRACKS, OR HEARD THEM HOWLING

_____ I HAVE SEEN MANY WOLVES, TRACKS, HEARD HOWLING

_____ I AM AWARE OF INCIDENTS WITH WOLVES THAT HAVE HAPPENED TO ME, MY FAMILY, OR RESIDENTS IN MY TOWNSHIP.

THANKS FOR RETURNING THE SURVEY IN THE ENCLOSED SELF-ADDRESSED STAMPED ENVELOPE. YOUR RESONSES WILL BE ANONYMOUS AND WILL BE PROVIDED IN COMBINATION WITH THE RESPONSES FROM YOUR TOWNSHIP. IF YOU DON'T CARE TO PARTICIPATE, I WOULD APPRECIATE A RETURN.

THE RESULTS FROM THIS SURVEY WILL BE SHARED WITH WI DNR STAFF, POLICTY MAKERS, THE NATURAL RESOURCES BOARD, AND ACADEMICS AND RESEARCHERS IN THE FIELD OF WILDLIFE MANAGEMENT.

FOUR RURAL TOWNSHIPS WERE CHOSEN FOR THIS SURVEY TO REFLECT THE OPINIONS OF THOSE PEOPLE MOST EXPOSED TO WOLVES OR POTENTIALLY EXPOSED TO WOLVES. ANOTHER PUBLIC OPINION SURVEY WILL BE DONE BY THE WI DNR THIS SPRING ON-LINE, AND A PREVIOUS SURVEY OF PUBLIC OPINION DONE IN 2013 IS AVAILABLE ON THE DNR WEB SITE.

IF YOU HAVE ANY QUESTIONS OR CONCERNS, PLEASE FEEL FREE TO CONTACT ME AT HOME, LAURIE GROSKOPF, TOMAHAWK, WI 715-453-6301

ANY ADDITIONAL COMMENTS OR EXPERIENCE YOU WOULD LIKE TO SHARE – FEEL FREE TO USE THE BACK OF THE SURVEY. 3/2021

TOWN OF HANSEN SURVEY COMMENTS:

I have livestock and they harass them all the time. I haven't had any killed YET by wolves but I have many friends that have. I think there should be a few up north and that's it.

Keep up the fight.

I just wanted to say that the DNR counts are way off in my opinion. There is no way that hunters could kill 20% of the population in less than three days. I have had multiple wolves on my land in the last year and I have seen pictures of 10 wolves on one picture from a friend's trail cam overlooking a food plot. I am not making that up, there were 10. So anyone who believes that there isn't a problem doesn't spend any time in the woods. (name and address withheld)

As a teenage girl who hunts, there are already a lot of challenges one has to endure. I did not think there would be a problem when I wanted to hunt the rut during bow season. 10 minutes into the hunt, I started to hear howling. Before I realized that it wasn't just my neighbor's hunting dogs, it was probably 150 yards away. I ran out to the truck, bow in hand, as fast as I possibly could go. 5 minutes after I arrived at the truck, a wolf popped out of the woods less than 100 feet away from me. This was my first experience with seeing a wolf in those woods. They had been in there for years. Every year, without fail, we would see them on our trail cameras. Some of these experiences have terrified me. The more we manage the wolf number, the less scared others may be to go back into the woods to pursue hunting, a family tradition in Wisconsin for many generations. While I understand many think we have overkilled wolves, I feel that if the limit was reached in two days of hunting, estimates may be a little bit off. I am very educated on this matter as I go to a very good natural resource school.

I had a wolf at the end of my driveway when garbage containers was put out. Scary. Also, one on the other side of my garage. I used to walk everyday, but don't consider it safe anymore.

Our fathers got rid of the wolves. As they serve no purpose, also are you sending money to the state to help pay for all the damage wolves do?

I can't think of one reason why I have to fear for my dogs' lives every time I put them out at night.

Our forefathers had a bounty on them for a reason. I feel there should be less than 100 in the state.

In the spring of 2019, we had a calf with substantial wounds on the side of his neck and hind quarters (gaping wounds). USDA came out and confirmed it was a wolf attack. On separate

occasions, we had a neighbor who lost several sheep in wolf attacks and another neighbor also had a calf attacked by a wolf.

As a livestock producer in heavy wolf country it is only a matter of when, not if, they find my cattle. The neighbors lost all their sheep to wolves and the DNR did nothing. It's time the DNR allows for ag damage tags to us producers that lose our livelihood to a government dog!!

Killed my dog in my yard.

The DNR is not being honest about the number of wolves in the state. I hunt coyotes, bobcat, and coon in a four township area in central Wisconsin and the number of wolves here is unbelievable and they try to say there is only around 1200 in the state. I believe 2400 is closer to the truth. I don't trust the DNR at all!

I have read or been informed that one wolf will kill, on average, 30 deer per year. I do not know how accurate this number is, but if it is accurate, that would be approximately 36,000 deer per year killed by wolves per year or an average of 500 per county. These numbers are not even close to accurate, just wonder if there is any reason for concern. Thank you for this survey.

My next door neighbor has (had) raised prize winning sheep for decades. His flock, number over 20, were completely killed in one night by wolves. There was no compensation. The children were devastated. Thank God they were not injured.

Our dog has been attacked twice!!

We can no longer walk our Woodland trails safely. Must carry a firearm! Have a horse with high voltage fencing around him. Still see wolves up close around the buildings! Have lights! We keep a shot gun with 00 buck loaded and ready at all times! Wolves are no longer afraid of humans, they cross our yard!! We live close to the family who lost their sheep to wolves. About 5 miles! We are seniors who love the outdoors and used to hunt deer, we can no longer hunt or enjoy our woodlands, or any state park trails! Children in our neighborhood can no longer play outside or ride their bike safely! We may need to fence all of our property with high voltage fence which is only way we can safely walk with our dog. We have 72 acres. Our neighbor's dog was killed by a wolf!

Numerous times I have heard 3 different wolf packs howling @ different locations.

Issue with coyotes in area. Deer population is decreasing due to coyotes killing them off. I know people say it is nature taking care of nature when coyotes kill deer. Some nights it sounds like they are killing their prey right out our back door. We don't hunt and I know they opened up for hunting coyotes and I think they, like wolves, need to be decreased in population. Need safety for our pets, etc. so we can let them roam in our yard and not fear of an attack. Thanks for allowing us to give you our opinion.

I am 74 and have always spent a lot of time outdoors. I saw exactly 1 wild wolf in Wisconsin before 1990. The estimate of 1200 wolves in Wisconsin is ridiculous. Probably twice that. Why does the DNR always over-count deer and under-count predators?

Our township has seen way too much carnage left behind because of packs of wolves. One neighbor had her dog killed. Another neighbor had a calf destroyed. Yet another neighbor had 13 sheep slaughtered. Last summer our teenage grandson and a couple of friends were camping in a tent a short distance from our barn in a little wooded area. In the morning, they told us that 2 wolves were within 20 feet of the tent. It sickened us so much. That was the last time they camped out.

They are nothing but killing machines.

Good management is a key to wolf control. Over the years, have only seen 1 wolf in my area that was about 6 years ago.

No wolves below Hwy 64. A friend lost a number of sheep to wolves. This is farm country. Landowners below Hwy 64 should be able to protect their livestock.

I have no issue with the idea of having some wolves around but the number of them allowed now is a pile of B.S. Let's keep pouring money into elk program so the damn wolves have even more protein available to them, rather than rabbits and mice. Wish I knew who is allowing this to go on and why??? I admire your time and work you've put in to this issue. Thanks for your efforts!

Have seen about 6 wolves in the last 10 – 12 years. Always single, never multiple. Always on dead run or jog. Never stalking or prowling. This area has many coyotes. Name withheld.

TOWN OF MAPLE SURVEY RESPONDENT COMMENTS

Better management needed as wolves have killed large amounts of livestock and many not being compensated!

The packs in our area are having a large impact on the deer population and domestic animals too. We lost our older dog last Feb. to wolves – she had two picture wounds on either side of her neck. She didn't recover.

Too many deer.

Several years ago I encountered a lone wolf while cross-country skiing behind my home. This year, I have seen several wolf tracks.

Share the earth!

Way too many wolves – cattle/livestock have been killed or badly injured. A pack of wolves, teaching their young to kill, will wipe out deer yarding up in heavy snow winters – not even eating them – just killing the entire group!. Happens near Lake Superior sometimes – I've seen it...or the remains of an attack. The wolf is a beautiful animal but there needs to be a huge reduction in their numbers in Wisconsin.

Less wolves = more deer for me to eat. Thank you.

A pack lived behind my parents home. Even came into the yard while they were working in the garden. They were snarled at and told by DNR to carry mace.

I just feel there is too many now.

No transplants. I have had bears and wolves and coyotes in my 40 acre woods. I feed cracked corn but only in limited amounts that can be cleaned up. I deal with wolves and bear by surprising them with banging frying pans together, and running towards them. I have seen a lot of does, but not a buck in three years. Land owners should be given a doe stamp (1) Too many does, not enough bucks. Don't make the same mistakes DNR did years back – bucks only – for too many years.

Wolves are sacred and should be respected – only killed as a last resort.

We need wolves. Not over populated, but enough to control other wildlife that can be a nuisance (problem).

They have killed many of my cattle, have made my farm a nightmare.

Why are we so far above the original goal? I have had them answer my coyote call – with a howl! Very close – too close.

No wolves.

My son and grandsons run a beef cow/calf operation in Douglas County. They have sustained losses every year since wolves were reintroduced. Last year, I believe they lost 16 animals – reimbursements do not ever actually cover their losses. My wife has returned home at night to find a wolf between her and the house. She had to wait it out in the car before she dared to walk to the house. Another incident at the farm was to find a cow having her calf with the calf half eaten with the calf still half in the mother. So, that said, the wolf population needs to be reduced. They find cows and calves easier to catch and kill than white tailed deer. They also had an impact on bear cubs.

If the people in Madison who think they know something about wolves would reimburse farmers for their losses, there wouldn't be a problem but farmers are not reimbursed

adequately. Releasing wolves in farming communities is idiocy. The people who want them clearly don't know where their food comes from.

I am aware of wolves in my area. In fact, I'm afraid to walk the dog after dark. Wolves have been in my yard. Less wolves would be my preference!

Wolves and hunters compete as top predators. They depress the numbers severely in local hunting grounds in transient fashion. They have high hunting success.

I do a 9 hour grooming run every week for a snowmobile club. I have seen wolves on the trail but not very often. I do see tracks quite regularly though. If they're bigger tracks, like the size of my fist, I take notice. Not every year, but I have run across kill sites. Messed up the whole width of the trail. No guarantee it is a wolf kill but was deer hair on the trail.

During hunting season my family that were hunting seen wolves chasing deer. There don't need to be that many wolves. My brother and I did not get deer this past year because of them. I don't want to see any in northern WI. He has had them raise havoc with his cows also.

The Farmers have had a lot of cows and calves killed by wolves, including our farm. People have lost dogs killed by wolves. DNR has tried to help some farmers but nothing they have done has worked for many farmers. There are too many wolves and they should be gotten rid of.

Thank you! For requesting the opinions and experiences of the people living in the wolf habitat areas. I own a large farm. Daytime wolf sightings are common place.

Wolves are here to stay in WI which I have no problem with. Our DNR need to talk to us hunter and trappers and get out of their fantasy world. My family and I run a bear guiding service, where we run bear baits in Bayfield and Douglas Counties. I can assure you there are at least 1000 wolves in these 2 counties alone. I personally have seen hundreds over the past 3 or 4 years. We need to have a season and manage them, not for 2 or 3 days in the spring – ridiculous.

The wolf population has far exceeded what is appropriate. These animals are destructive and dangerous to the cattle and children.

I would prefer to have the state in control of wolf management. However, I have some qualifiers that need to be addressed by the DNR. We need a science-based wolf management plan that reflects the viewpoints of all stake-holders. Wyoming does not allow dogs in the chase, both night hunting and electronic calls are not allowed, I believe. We need strict registration requirements. Personally, I would like to see tighter trapping restrictions as well. As an aside, a farmer friend of mine lost a calf to wolves this past winter. The DNR reimbursed him \$600. His comment was "I should start raising bear dogs, I'd get \$2,500 instead if I lost one." I hear a lot of anger and frustration over that one issue.

One cow was killed on my grandson's property last summer. As I was walking north on _____ Rd. where I live, about ¾ mile from the house, I had a stand off with a wolf, waving my hands and yelling at it. Didn't seem to affect him. He showed his teeth and looked angry. Finally it walked in the woods. Its almost like they are not afraid.

I typically run 10 – 15 trail cameras throughout the year all around Bayfield and Douglas Counties, and in the early 2000's a wolf picture was very rare, so rare it was very neat to capture one on camera. In the last 5 years, it has gotten to the point that I can count on nearly every camera having a picture of at least one in not several wolves on it. Over the years, I have had several encounters with them and some area packs have become so bold in showing their presence I have removed cameras and gave up hunting/scouting all together to avoid conflict. We also have to keep our dog on a lead at all times and keep a close eye on her when we let her outside after dark. I know of several people who have had dogs attacked either in the woods or in their own yards over the last few years. Several times we have been woke up by them howling and tracks show they have been within 8 feet of our home. I'm not saying I would like to see them eradicated by any means. But we need to get the population back down to a more easily manageable number or I fear they could easily spiral out of control, which I feel they are doing currently. Thank you.

I would like to see all wolves killed off. They killed deer hunting for myself and everyone else.

They need to be managed at the state and local level!

No transplanted wolves in Maple!

TOWN OF RUSSELL RESPONDENT COMMENTS

I think trappers should get a chance @ wolves before dog runners fill all permits. Also, a area that gets a quota of 5 wolves gets 5. Not 3 and shut down because other areas shoot more in their area and it fills up the quota for other areas. One note: I live in the woods with small animals that have to be locked up every night for their safety. Not fair for my animals just for them to stay alive.

Discussing the issue of wolves in this State is like discussing religion or politics. You will never get a group of people to agree. I feel sorry for the wolves because they are just being what they are. They have to eat flesh to survive and most time must kill. Who can blame them for that? They are a species with a complex family structure and it must be disturbing to the pack when their members are shot and killed. Owning cattle, however, I can certainly understand the anger that comes with losing a calf/cow to a predator. Or as a pet owner losing a dog. Maybe the answer is not killing, but sterilization to keep the wolf population from exploding. Good luck with the issue of wolf management. They are a beautiful animal and certainly should have a place in our ecosystem.

Get rid of all. We don't need one single wolf in Wisconsin.

They are nuisances that kill livestock and potentially take down a small child. The less the better.

I believe in a common sense hunt of wolves to keep the population in check. I also believe farmers and family should not fear wolves on their property.

I'm sending this because our Mennonite neighbors will not reply and this happened in the Township of Birch. Birch is not in your survey group. With 4 persons in the house located on Co. J, they watched 4 – 5 wolves kill a deer who was pregnant with twin fawns. The wolves ripped her apart and ate her but laid 2 fetus aside. They, they carried the fetuses with them when they were done cleaning up the doe. This is just too close to us. DNR needs to attempt to keep wolves in wilderness areas – tranquilize and move them to northern wilderness. Thank you for doing this.

The wolf population needs to find its own equilibrium. They are a native population and endangered because of the rampant killing of the past. We should be beyond such ignorance but, as the recent hunt shows, hatred and bloodlust is driving this slaughter.

Farmers and individuals should prove they are having wolf problems and then a permit should be issued. Not just blanket to kill. There are more problems with coyotes and loose wild dogs than wolves. Also, why doesn't the DNR control the bear population? That is a serious problem in our area.

Number of wolves need to be determined by someone with more knowledge than I have. My only concern is deer fawn predation.

We know of a pair and a lone male that regularly travel in our area.

I was born on a small farm in _____ and lived in Lincoln Co. all my life. I presently live in the village of _____, where we have lived since 1968. I do have acreage and a log cabin in the Town of _____, where my wife says, I spend most of my time. Having this property has enabled me to spend many hours in the woods, as do my 2 sons who live about 1 hour away. I first saw a wolf on my property about 20 – 25 years ago. One of my 40's borders a private landowner, and when he started to have wolf problems. They were after his horses. This was substantiated by the DNR agent who visited the farm. I believe we can live with wolves, but I most definitely believe they are way over-populated. I found a young doe's remains only 3 weeks ago on my property. It was a fresh kill scattered all over, and by the next morning, there was only some hair left.

Finding many deer carcasses in one area. Five in a 20 acre area of woods on private property.

My father was attacked by two timber wolves on our property in 2015.

I don't believe the DNR actually knows how to count wolves and that these numbers are bogus. But I do believe there should be a yearly season with similar bag counts as this last hunt.

I hate wolves. Kill on site!

We have too many coyotes.

I don't understand the sense behind adding another predator. Such as wolves to Wisconsin that our beloved DNR did around 10 years ago. Blaming it on the wolves migrating from Canada.... (expletive)...and to all the ones saying that the last wolf hunt was just "a mass killing" obviously doesn't live with the animals nor sees the destruction these animals do. So to end my conclusion, that nothing will come from anyway, I don't believe that wolves should be in Wisconsin Period. Our fellow forefathers as always put a stop to something that the DNR just comes back in and says it's for the better reason.

Family dogs killed. Judges and DNR personnel need to have required field trips to New Wood for at least a weekend, with their family's dogs, and let them run and bark. Judges with no skin in the game will never understand. DNR knows they should have set a goal of 500 wolves for the wolf season, reaching over 200 in 3 days. New World order lovers, who want 500 to 800 million people in the world, there is 7 billion now. If you get rid of people, then wolves are necessary to keep the deer in check. No hunter or guns needed.

If you like deer you don't like wolves. They are predators and have no population control other than humans and sickness.

Wisconsin's Feb, 2021 wolf hunt was an example of the worst management of wildlife possible. The state DNR issues a huge number of wolf hunting permits – 2380 – twice as many as typical – for a quota of 119 wolves. 216 wolves were killed in less than 60 hours! Nearly 85% were hunted down and killed by hunters using packs of dogs, which is an extremely cruel and unsporting practice (for hunting down bear as well, I might add). Why was the hunt held in February when the females are pregnant?? 45% of the wolves killed were female! I have never seen or heard of such a mismanaged hunt. The WI DNR should be ashamed of themselves! Now they are planning another "trophy hunt" in November? The Feb. hunt was scientifically unjustifiable and illegal under WI State Law. The wolves need to return to the Endangered Species status.

TOWN OF RICHWOOD, RICHLAND COUNTY

I have not seen any wolves here. One time several years ago, I saw one when we had a flood and it was standing across the creek on dry land. I read about the society of wolves and was impressed. I think they are very smart animals. Thank you for the work you are doing.

I can't imagine that Richwood Twp. in Richland Co. was one of the four townships selected. Other than a very occasional wanderer, there are no wolves in the SW Wisconsin.

I seen a wolf about 10 yrs. ago. I live less than 3 miles from the Wisconsin R. That wolf was coming off the bluffs and going into the river bottoms. Crossed the road in front of me. Got a good look at him. About 3 yrs. Ago I found a set of tracks on some land I rent. In Feb. of this year (2021) I saw 2 wolves as they were as tall as the deer they were chasing. I have lived and farmed in this area for 42 years and have seen 100's of coyotes and you can tell a wolf by the height of them. I live 3 miles north of the WI River, Richwood Township.

We have bobcats and coyotes that are hard on small game birds.

Wolves are beautiful creatures and should not be hunted for sport. I never seen a wolf before, but would love to see one. Someday, I personally would love to see these animals thrive so future generations can experience them.

They have every right to be here, same as you and I. We need to stress conservation and wildlife respect to WI residents.

My opinion is properly managed.

Wolves enough to keep deer population low. Too many deer in our area!

I feel that without a hunt to manage the population wolves will lose their fear of humans and aren't afraid to enter areas populated by humans. I saw a large, thin, very old looking wolf within 1/8 mile of our house 2 nights in a row about 1 ½ weeks ago. We see single wolves or pairs around here occasionally. There are several beef herds in the area and I occasionally hear of calves lost to wolves or coyotes, but its been awhile.

1200 or more only if I can hunt and trap. (this record selected same number of wolves)

Don't need wolves!

Wolves should be treated as coyotes are. Open season year round.

As for wolves in this area, we have seen and heard them for 20 some years and we don't need them in this area.

Do not want any predation in my animals. When I worry every time an animal is pastured, the joy of country life is reduced. Keep a small number of wolves in the "north country" if you want them at all. Our herd does not need to see them.

Kill them all. SHOULD NEVER HAVE REINTRODUCED TO OUR STATE.

Have enough problems with coyotes killing animals without wolves added!!!

TOWN OF ALVIN, FOREST COUNTY

I would like to see no wolves in Wisconsin.

350 or less in the state, not 350 in one county – Forest Co.

My son-in-law sees wolves at his cabin area.

I and my wife have nothing against wolves. Its great to know they are out there. In fact, they add some mystic to our great Northwoods. I bow hunt a lot and have seen far more bears than wolves. Just not out of control. Thank you.

The wolves are not the issue in our county. We have had more significant problems from bear hunters with their dogs and training than having wolves in the forest. Considering how much time we spend in the National Forest, and having experienced no negative contact with wolves, the current population does not pose any issues for us, our family, or friends. It's time to stop catering to the hunters and start considering the residents of the state and counties. One additional comment: As a resident who lost a dog due to those poisoning the wolves, its really time to re-evaluate the real problem here, and it isn't wolves.

You got a live one when you sent this to me. We are overrun with deer. I have no idea about the management goal or range, but I'd like to be near them or see one once in a while. I feel like seeing a wolf up here is about the same chance as seeing a sasquatch. How do you change the attitudes people have? People here have an irrational, vitriolic rabid attitude against wolves. No one here has sheep or cattle to get riled about a wolf predating.

Too many deer, not enough wolves.

SOURCES

Unpublished draft April, 2010 preliminary DNR WI wolf plan revision

“Longitudinal Analysis of Attitudes Toward Wolves”, Adrian Treves *et al* Conservation Biology, 2013

Wisconsin Wolf Policy: Changing Attitudes, 2001 – 2009, Adrian Treves, Lisa Naughton, Tory Shelley

Public Attitudes Toward Wolves and Wolf Management in Wisconsin, August, 2014, WI DNR

“Minnesotans’ Attitudes Toward Wolves and Wolf Management”, Summary Report, U. of MN, MN DNR, MN Cooperative Fish and Wildlife Research Unit, Dept. of Fisheries, Wildlife and Conservation Biology. Schroeder, S.A. Landon, A.C., Cornicelli, L., McInenly, L., Stark, D., 2020

“On Wisconsin” U. of WI Alumni Assoc. Newsletter, Fall, 2009, Vol. 110, #3 – “Wolves at the Door”, John Allen

WI Wolf Management Plans – various years including 2019 – 2020, 2012 – 2013, 2013 – 2014

L. David Mech, International Wolf Symposium, October, 2018, keynote address

Wolf Island: Discovering the Secrets of a Mythic Animal L. David Mech with Greg Breining. U of MN Press, 2020

About the author: Laurie Groskopf has been an activist on wolf issues for over 25 years, most intensively since 2009. She has lived in the Northwoods since 1974, and prior to that, was a student at UW Madison, 1969 – 1971 and graduated with a B.A. in Psychology from UW Platteville in 1974.

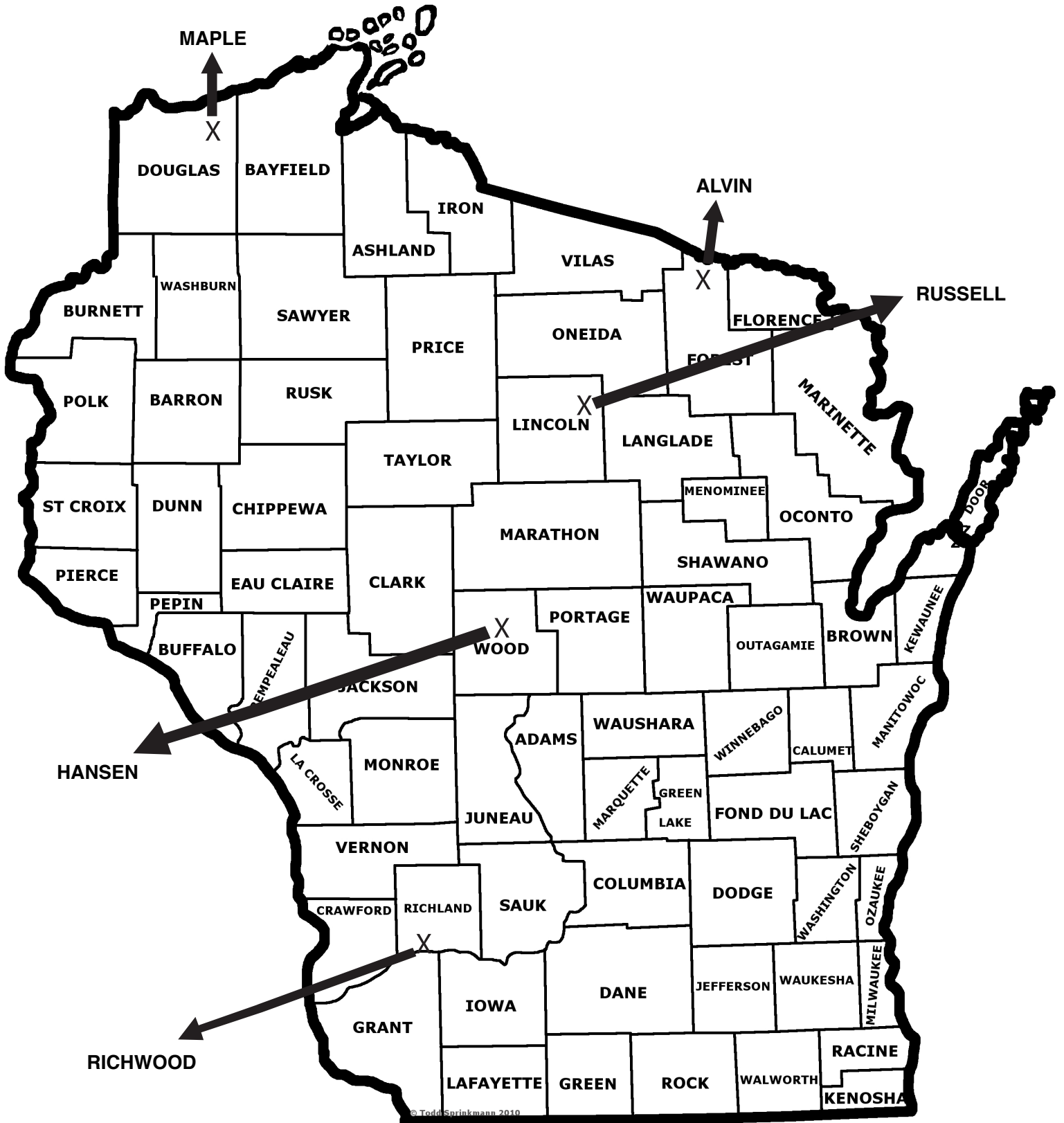
Serving in many organizations in the past, Laurie represented the WI Wildlife Federation on the DNR Wolf Management Revision effort last time wolves were delisted.

Laurie has volunteered as a wolf tracker for the DNR for 8 winters. She was a co-creator and on the board of WI Wolf Facts, a non-profit organization which is a consortium of wildlife and agriculture groups dedicated to sensible and responsible wolf management. She also organized and worked with hundreds of citizens and many organizations to enable county boards to discuss and act on recommendations regarding wolf management and goals. Between 2010 – 2017, 36 County Boards (1/2 of all counties in WI) passed resolutions in favor of a wolf management goal of 350, 350 or less, or several counties less than that. In addition, a number of statewide organizations also enacted policy to promote a goal of 350 or 350 or less due to Laurie’s work with hundreds of stakeholder and groups. As a board member of WI Wolf Facts, Laurie helped organize and run “Wolf Summit II” and arranged for 7 videos to be made (posted on their web site) giving farmers and hunters a chance to tell the public about their personal experiences with wolves.

Twenty-two years of survey work gathering information for USDA, DATCP, ERS, and other federal agencies have taught Laurie the complexities as well as simple usefulness of public surveys. In addition, Laurie has worked in public information including training by EPA, done outreach with UW Madison School of Medicine and Public Health, served as Planner/Program Coordinator for community-based elderly programs in 17 counties in northern WI, and run a number of non-profits.

Laurie has attended many major wolf conferences and spoke at the Mid-West Wolf Stewards Conference in Minnesota. She also attended a college course offered at the International Wolf Center in Ely, MN. Laurie lives in rural Lincoln Co. with her retired hounds and very supportive hunting partner, who is just about the best tracker in Wisconsin and the best friend and most experienced outdoors person a Northwoods lover could ever ask for.

WOLF PUBLIC OPINION SAMPLES



USING HARVEST DATA TO DETERMINE ACCEPTABLE HUMAN TAKE OF WOLVES

Prepared by Laurie Groskopf, 2/13/17

Background

In designing Wisconsin's first three wolf harvest seasons, the stated goal was to begin to reduce the wolf numbers toward the existing statewide population goal of 350, as measured by the overwinter minimum count. Data from two sources were used to determine what total human take would result in stable wolf numbers, and what total human take would reduce wolf numbers. Total human take includes all harvested animals, animals taken in control actions, hit by vehicles, illegal take, and rare other events.

Two sources were used: Layne Adams study of wolf harvest in Alaska, and a compilation of many studies done by Fuller (see Mech and Biotani, 2003). The Adams data showed a stable population would be obtained by a human take of no more than 29% of the minimum count. The Fuller studies were all over the board, but boiled down to a 22% human take being the stabilizing number. Therefore, WI DNR picked harvest quotas between 22 – 29% for the first three harvest seasons' take, minus other human take such as lethal control actions in response to depredations and the other human take mentioned.

Wisconsin's first three harvest seasons

In the spring of 2012, the minimum wolf count was around 820. Based on estimates of how many wolves would be dispatched in depredation controls, and other human take, a harvest season in the fall of 2012 resulted in 117 animals taken. Total human take was 239.

$$239/820 = 29\%$$

The next spring (2013) the wolf count was essentially unchanged at 809 minimum. The WI DNR chose a harvest number which resulted in a harvest take of 257. The total human take was 364.

$$364/809 = 55\%$$

The next spring (2014), the wolf count decreased by 18.4% to 660. The WI DNR made a decision to reduce the harvest for 2014. Post delisting US Fish and Wildlife Service rules state that any reduction of 25% or more would cause US Fish and Wildlife Service to do a review. The review meant they would ask WI if we were attempting to reduce the wolf population. Since our plan has a goal of 350, and since the WI DNR consistently said we were going to attempt to reduce the wolf population there wouldn't have been any sanctions. But DNR decided to reduce the wolf harvest anyway. The 2014 resulted in a harvest of 154, a total take of 222.

$$222/660 = 33.6\%$$

The next spring (2015), the minimum wolf count was 746, an increase of 12.5%. As you know, wolves were relisted, and no harvest occurred in the fall of 2015. In April of 2016, the minimum wolf count increased to 866, an increase of 16%.

So it appears from Wisconsin's three wolf harvest season experience that total human take of 29% and 33.6% were not enough to reduce the wolf population. The only year the stated goal of reducing the wolf population in WI was achieved was 55% total human take in 2013.

What about Idaho and Montana?

When Wisconsin had its first season, Idaho and Montana had only conducted wolf seasons in 2009 and 2011 (they were relisted during the 2010 season). Since then, we have the benefit of 6 years of seasons in both states. How has total human take influenced their wolf numbers?

IDAHO

Year	wolf count	harvest	total human mortality	%
07	764	0	78	10%
08	849	0	153	18%
09	856	135	275	32%
10	777	46*	144	18.5%
11	768	200	296	38.5%
12	722	329	425	58.9%
13	684	356	473	69%
14	785	256	360	46%
15	786	256	358	45.5%

Wolf count is adjusted, not original in updates. *season ended due to relisting. We can see Idaho has essentially not changed its wolf numbers even with substantial harvests. Total human take in some years is up to almost 60-70% of their count.

MONTANA

Essentially, the story seems the same in Idaho and Montana.

2015	536	205	270	50.4%
2014	554	213	301	54.3%
2013	627	231	276	44%
2012	625	175	304	48.6%
2011	655	121	203	31%
2010	560	0	132	23.6%
2009	525	68	242	46.1%
2008	497	0	142	28.6%

We now have current hard data from the continental United States, including Wisconsin, from which we can design a harvest to bring us to the existing wolf management goal.

RE: 2021 Wolf Harvest Advisory Committee Comments

By all accounts, including international news coverage, the February wolf hunt in Wisconsin was a shocking slaughter. The hunt proved the quota set for wolves was essentially meaningless and led to the killing of nearly 20% of our state's wolf population in just three days. For an animal that less than a month earlier was on the endangered species list, this is an incredibly sad reminder that the state needs to take more time and stronger actions to protect this valuable natural resource.

Based on the results of the February hunt, the gross overharvest of wolves, and the inhumane tactics allowed in wolf hunts, we respectfully request that this committee set a ZERO quota for wolves during the 2021 Fall Harvest season. This will give the DNR the necessary time to evaluate the true impact of the February harvest and develop much needed rules and enforcement to properly hold or repeal any future hunt.

This request is based on a number of important factors around wolves in Wisconsin:

Wolf populations are in significant danger of decline

- By killing 218 documented wolves during the 3-day season, wolves in the state have already had their population reduced by nearly 20%. That means in just two weeks, hunters could have exterminated the entire wolf population in Wisconsin.
- The loss of breeding females and males has an additional impact on wolf reproduction, estimated at a 25-40% drop for population growth.
- Wolves also face threats from natural causes, undocumented hunting, and the control of nuisance wolves that further add to the losses from the February wolf hunt.

Wisconsin does not need to currently manage wolf populations through harvest

- Wolves account for a tiny impact on Wisconsin livestock. With an estimated 3,500,000 cattle, there were only 98 confirmed wolf depredations in all of 2020.
- In contrast, more than twice that many wolves were killed during the February harvest, leaving a population of less than 1,000 animals.
- Animals killed during these harvests are typically hunted on public lands and target wolf populations which are less likely to interact with livestock and landowners.
- Landowners are also given the right to kill nuisance wolves and given financial compensation for the damage caused by wolves.

Wolf populations are critical to the ecosystem of Wisconsin

- Wolves and other top predators help control populations of deer. These predators target animals that are smaller, weaker, and sickly because they are easier to catch, conversely, those are not the animals primarily targeted by hunters.
- With reduced native predator populations, Wisconsin has become one of the worst states for chronic wasting disease. Wisconsin is one of only five states that even faces a significant CWD concern, including the spread to captive herds.

- Chronic wasting disease is terrifying. It is in a class of illnesses caused by something called prions. Prion disease cause unstoppable, progressive brain damage, they are incurable and universally fatal if they jump to humans.
- Wolves actually protect Wisconsin residents and hunting heritage by helping to prevent this disease, which already threatens a hunters' ability to use their kill.

Current wolf hunting rules do not reflect Wisconsin's humane and ethical hunting heritage

- Many individual hunters and hunting groups have expressed their disapproval of the way the February wolf hunt was handled and the shocking disregard of the quota.
- The February 2021 wolf hunt did not honor treaty, land, and heritage rights of Native tribes.
- Wolves have not been hunted like this in nearly 50 years and are not eaten by hunters. They only represent disturbing "thrill kills" rather than any sporting heritage.

Proposed plans for hunting wolves deeply defy our own laws for humane treatment of pets and animals

- Wisconsin is the ONLY state in the entire country to allow the use of dogs to track and trail wolves, with nearly unrestrained in-the-wild training of these dogs. Pitting dogs against wolves is essentially a form of dog fighting.
- Traps, snares, cable ties, and packs of hunting hounds cause serious injury and suffering to hunted animals and pose dangers to other users of public lands.
- It's against the law to pursue or harass a wild animal with an ATV in Wisconsin. Allowing ATVs, snowmobiles, helicopters or any method of chasing the wolves to exhaustion is unethical, cruel, and is not "fair chase" hunting.

Respectfully submitted,

Jeff Okazaki
Executive Director, Humane Society of Jefferson County

18 June 2021

To: Wisconsin Natural Resources Board,
Wisconsin Department of Natural Resources,
Wolf Management Plan Committee, and
Wolf Harvest Advisory Committee

Via: DNRWildlifeWebmail@wisconsin.gov

Re: 2021 Wolf Harvest Season and Future of Wolf Management

My name is Francisco J. Santiago-Ávila, a PhD and Postdoctoral Researcher at the University of Wisconsin-Madison with a focus on large carnivore conservation and environmental ethics. My doctoral dissertation focused on an interdisciplinary evaluation of wolf management in the Western Great Lakes, more specifically in MI and WI. (1–3) My postdoctoral work focuses on analyzing how reducing protections for large carnivores impacts their mortality and, more specifically, their illegal killing (i.e., poaching). (2,4)

First, I would like to explicitly express my opposition any future wolf harvests or any quotas above 0 wolves, given robust scientific and ethical evidence of harmful effects. Given the latest scientific findings as well as the current scientific gaps in understanding of wolf population dynamics and wolf mortality, a wolf hunt will undoubtedly harm Wisconsin's wolf population, domestic ungulates, hounds, their owners, and constituents' trust in Wisconsin's wolf management. Recent, robust scientific evidence suggest a wolf hunt would be detrimental to all the beings above through not only harms (e.g., injury and death), but also loss of public confidence in agency management charged with following public trust obligations supported by the best available science. Second, the arguments and evidence discussed below are also relevant to future wolf management in WI; especially to the place of deliberation, ethics and science in the protection of and coexistence with nonhuman nature, and specifically wolves.

Scientific-empirical matters

Reducing protections for wolves is associated with an increase in their concealed, illegal killing
Various independent peer-reviewed studies in the past two decades, the best-available science on this topic, have confirmed that reducing protections for Wisconsin wolves (i.e. permitting their killing) is associated with more intolerant attitudes and behaviors (e.g., poaching) towards them. This claim is supported by both social science and demographic data on the WI wolf population: attitudes towards wolves are more negative after protections are reduced, and wolf population growth is reduced through illegal killings. (5–7) On this point, it is important to remember that policies sanction values and behaviors. To put it simply, one protects those which one values highly and respects, and removes protections from those not deemed worthy of such. Wolf policies should promote respect for and coexistence with wolves through their continued protection, rather than their instrumentalization through the removal of said protections.

Additionally, the latest and strongest empirical evidence to date, from WI, suggests an increased rate of *concealed and previously unmeasured*, illegal killing of wolves during periods of reduced

federal/state protection, and even without wolf hunting. (2,8) Importantly, this research found no support for the argument that reducing protections for wolves will reduce total poaching or anthropogenic mortality. Poaching is the largest source of wolf mortality and is largely underreported in Wisconsin wolf management, which also leads to consistently overestimating the size of the wolf population. (9,10) Further reducing protections for wolves by establishing a wolf hunt may send a stronger policy signal that further devalues wolves, increasing illegal killing, (2,4) harming the social dynamics of the wolf population (11) and potentially its viability. Indeed, our most recent work (under review) suggests reducing protections for wolves and the February 2021 wolf hunt combined resulted in a 27-33% decrease in the wolf population since April 2020 when considering the additional mortality caused by reducing protections for wolves. (12) Incentivizing the resulting concealed, illegal killing by reducing protections for wolves runs counter to the public trust responsibilities of the NRB, the WDNR and involved committees. Instead, an objective of any wolf management plan should be to mitigate poaching to the extent possible, and evidence suggests increased protections and enforcement, coupled with education, are more effective strategies.

Anthropogenic mortality may harm population health, not only viability

Anthropogenic mortality, legal and illegal, also harms the health of the wolf population through its social impacts, breaking up packs where each member plays a critical role, increasing pup mortality, and increasing the risk of conflict with nearby domestic animal breeders. (3,11,13–15) Given we are talking about long-living, apex predators capable of intrinsically regulating their own populations without any predation pressure and in which this self-regulation depends on social stability (16), such killing will undoubtedly harm the social health of the wolf population. That risk may prompt federal relisting based on lack of adequate regulatory mechanisms to protect the *health and viability* of the population, as has happened multiple times before with WI wolves in the past two decades. Ignoring these risks for the sake of a minority of constituents amounts to a violation of agency responsibility to the broad public, including valued non-human beings and future generations. On this point, it is imperative that future wolf management research and provide information on the social health of the wolf population and how it is affected by anthropogenic mortality (e.g., see 11), rather than relying simply on population numbers (which only speak to viability). To my knowledge, there is no such research for WI wolves, nor any literature on the matter cited in the current 1999 Wolf Management Plan (see next section on dismissal of wolf claims). Any consideration of lethal management by responsible trustees should come only after such research is conducted, and in light of its results.

Increased protections for wolves and non-lethal interventions minimize harm to wolves, domestic animals and landowners

Lethal killing of wolves by agency personnel has a mixed track-record at reducing wolf predation on domestic animalsⁱ (17–19), and research from various contexts, including most notably Michigan (with similar environmental conditions and management), has found that it may be counterproductive: wolf-killing by agency personnel disrupts pack structure, forcing wolves to go for easier, non-wild prey, increasing the risk of harm to domestic animals in adjacent properties. (3,11,20) Moreover, this increase in risk from lethal management to adjacent properties comes without any major reductions in risk for the target property relative to ‘doing nothing’. Plus, ‘doing nothing’ did not increase the risk of conflicts in adjacent properties, arguably because packs were left intact and thus able to hunt wild prey more effectively. (3,20)

Similarly, the latest empirical research from WI found that in addition to increasing concealed poaching, reducing protections for wolves also increases their risk of being killed legally by managers and landowners as a response to conflicts *at an accelerating rate* over a wolf's lifetime. (2) Essentially, allowing the killing of wolves results in an increased incidence of complaints over time from landowners to kill more wolves (potentially linked to break-up of pack structure and the increased risk to adjacent properties discussed above), suggesting again increasing risk of *perceived or actual* conflicts, reduced tolerance for wolves, and increased harm to wolves, domestic animals, and their caretakers. This negative effect of reducing protections for wolves runs counter to trustees' responsibility to mitigate harms to both humans and nonhumans. Moreover, the indiscriminate killing sanctioned by a wolf hunt can only exacerbate these harms: no method of indiscriminate killing by the public, such as hunting wolves, has been proven effective at reducing wolf-human conflicts. (21) At the very least, given the evidence presented, the burden should be on the WDNR and NRB to prove that these harms will not materialize with the establishment of a wolf hunt.

As conflict-mitigating alternatives, there are scientifically-proven, functionally-effective non-lethal methods of preventing conflicts with wolves, such as (turbo/electrified) fladry and livestock-guarding dogs, both tested with gold-standard experiments and proven effective in mitigating wolf-predation in MI properties. (22,23) In addition to being more effective at mitigating conflicts on target properties, such non-lethal interventions can be employed without the risk of any spill-over predation risk to adjacent properties (as may be the case with lethal methods). Therefore, any future wolf management concerned with improving coexistence and reducing conflicts should, at the very least, promote and prioritize the funding and implementation of non-lethal interventions which can effectively reduce harms to all beings.

Politics, policy and ethics

More importantly, the ethics of current wolf management are misguided and lack the necessary justification for the harm caused to wolves. (e.g., see 24,25) Scholarly work from multiple fields (e.g., traditional ecological knowledge, biology, ethology, ethics, social science, philosophy) now regard wolves as holding many of the same morally-relevant traits and relationships (e.g., sentience, awareness, sociability, dialects, culture, companions, families) that humans have and that make the latter non-killable for any of the reasons used to kill wolves, least of all killing for recreation. (26–31) However, the documents relevant to WI wolf management do not even acknowledge the scientific evidence relevant to the internal capabilities, and thus ethical treatment, of these highly cognitive, emotional and social nonhuman animals. (see 25 for a discussion) Instead, the state plan includes only evidence relevant to human interests (e.g., 'how much can we kill?') instead of, first and foremost, who we are dealing with (e.g., 'who is this being?'; 'how much should we value it?'). This dismissal demands but lacks robust justification, suggesting the NRB and WDNR share in an anthropocentric, consumptive paradigm dismissive of nonhuman nature and its advocates. Correction of this anthropocentric bias through inclusive, pluralist participation and deliberation (see below) seems critical for rebuilding trust in state wolf management.

The current scientific evidence and increasingly considerate worldviews towards nonhumans converge with the traditional Ojibwe view of considering wolves as persons worthy of

compassion and justice, despite the metaphysical differences. (1 [Conclusion],29,30) This value shift is worth noting because the Ojibwe generally oppose any population targets, hunts and other lethal interventions for wolves. Such views are increasing among other constituents as well, evidenced by social science documenting shifts to increasingly considerate, rather than traditionally dominating, views of large carnivores and nature in general. (32,33) Social scientists have also documented an increasing gap on ethical issues related to the harmful treatment of wildlife between public agencies and this growing constituency, a gap which is characteristic of Wisconsin wolf policy. (34) That shift in worldviews is also evidenced by plummeting numbers of recreational hunters nationally. (35) This view of nonhuman animals, including wolves, as worthy of care and respect is more holistic, with a much more robust basis in not only traditional ecological knowledge, but also ethics, philosophy and the ‘Western, natural’ sciences. The advance of such a holistic view should be viewed as an opportunity to revamp wildlife protection to align with the views of non-consumptive users, while allowing them to contribute more equitably to both funding and decision-making.

Acknowledgement of such holistic views should begin with equitable consideration of said views, as well as of wolves themselves. Currently, WI laws and regulations lack consideration of wolves and their claims when intervening in their lives. (see 25 for a discussion) Correcting the stark lack of consideration of these views and of wolves themselves in Wisconsin wolf management (see 25 for a detailed treatment) is indispensable for ethical coexistence.

Such ethical corrections are impossible without the equitable deliberation and participation in management for currently underrepresented views. On this point, the NRB and WDNR would benefit from creating a space (e.g., an advisory committee or working group) for the exploration of diverse values and worldviews within the policy-process, e.g., through transparent discussion of the following: ‘Why are ethics indispensable to the policy process and wolf management?’; ‘What are the ethical points of departure (for each/all views)?’; ‘What values inform them? What do each of these consider, enshrine, and/or dismiss?’; ‘How do we consider wolves as beings? How do these views compare to what we know about wolves and who they really are (as evidenced in the scientific literature)?’; ‘What does ‘coexistence’ with wolves on the landscape mean?’. Importantly, this exploration should include discussing human activities and worldviews that either harm or are prejudiced against wolves and wolf claims (1 [Introduction and Conclusion],25,29,36).

To facilitate such dialogues, I would suggest approaching trained experts on environmental/animal/nature ethics and policy (rather than any professional mediation service), which are indispensable to guide such efforts through education, training/workshops, and ethical guidance for organizations, advocates, policy committees, agency staff and policy-makers (see 25,37,38). These trainings are indispensable given the need to establish a basic common language and understanding among the public of the ethical issues involved in wolf management, as well as how to approach them in a way that encourages convergence of values but respects disagreements; i.e., establish a ‘learning community’ (see 37,38). Importantly, there is precedent for the institutionalization of ‘mixed-method approaches for ethics-based policy dialogue’ by the USFWS, and this is consistent with the National Environmental Policy Act (37). After the above deliberation, the agency can conduct or commission ethics ‘reviews’ or ‘briefs’ on wolf management by experts, with the goal of analyzing the results of the ethical training/workshops

and deliberation (also proposed for wolves in http://www.williamlynn.net/pdf/HSUS-2014-Comments-on-the-Removal-of-Gray-Wolves_Final.pdf). Such an ethical policy review would also discuss the robustness of the arguments for each ethical position in the same manner a scientific assessment discusses the robustness of the relevant science. Ethics briefs/reviews can then guide decision-makers through the ethical implications of various management approaches and techniques. Ideally, they would serve as a complement to any scientific assessment/review relevant to wolf-human coexistence. Without the expertise and assistance of professionals trained to analyze ethical stances and arguments, how are we to resolve ethical disputes or clarify what's at stake? For scientific matters, these disputes are clarified by scientific panels. Similarly, if deliberation of ethics is a critical component of wolf policy, then there should be both inclusive, participatory deliberation and briefs/reviews to clarify the ethical concerns involved.

Needless to say, such a process may take more time and resources than what the NRB and WDNR have allocated for deciding on a 2021 wolf hunt and the future of wolf management. Moreover, such improvements in participation and deliberation would entail substantial changes in the ethical, ethnic, racial, gender, socio-economic, etc. composition of policy-making bodies such as the NRB and wolf-policy advisory committees. I strongly encourage the acting NRB and WDNR staff to promote and engage in such changes in member composition, which would go a long way to building trust with constituents, rather than promote the scientifically-evidenced gap in values between managers and the public.

Conclusions

I submit the above for the NRB, WDNR, and relevant committees, to consider regarding the implementation of future wolf harvests and the future of WI wolf management. Regarding any future wolf harvest seasons, given the lack of ethical and scientific justification, the harms to all beings mentioned above, and given the state has been forced to implement a wolf hunt by statute, the most adequate course of action, ethically and scientifically, would be to establish a quota of 0 wolves from non-reservation lands. This quota is the only one supported by the best available scholarly work on wolf management and our improved consideration of non-human beings. A 0-wolves quota would preserve the well-being of wolves, domestic animals, hounds, and that of the humans legally responsible for them. It would also build trust with Tribal co-sovereigns as well as constituents in general that are increasingly pushing back against the blatantly unethical practice of killing for recreation.

Regarding the future of state wolf management, there is much to do to make it conform to robust ethics and science. Given what we know about wolves, our interactions with them, and changing societal values increasingly considerate of nonhuman beings, the goal of wolf policies should be peaceful coexistence, respect and equitable consideration of their claims alongside ours. The above discussion of WI wolf policy and cited literature suggest such a goal is achievable, and harms minimized, through a pluralist approach to ethical and scientific deliberation and decision-making that clarifies the values at stake and promotes mutual understanding. I hope my discussion and recommendations to that effect prove useful.

Thank you for taking the time to consider the above concerns.

Sincerely,



Francisco J. Santiago-Ávila, PhD, MPP/MEM

Postdoctoral Researcher, Carnivore Coexistence Lab, University of Wisconsin-Madison
Board of Directors, PANWorks
Science Advisory Board, Project Coyote

Literature cited:

1. Santiago-Ávila FJ. An interdisciplinary evaluation of large carnivore management: The gray wolf (*Canis lupus*) in the Western Great Lakes. University of Wisconsin - Madison; 2019.
2. Santiago-Ávila FJ, Chappell RJ, Treves A. Liberalizing the killing of endangered wolves was associated with more disappearances of collared individuals in Wisconsin, USA. *Sci Rep* [Internet]. 2020;1–14. Available from: <https://doi.org/10.1038/s41598-020-70837-x>
3. Santiago-Ávila FJ, Cornman AM, Treves A. Killing wolves to prevent predation on livestock may protect one farm but harm neighbors. *PLoS One* [Internet]. 2018;13(1):1–20. Available from: <https://doi.org/10.1371/journal.pone.0189729>
4. Louchouart N, Santiago-Ávila FJ, Parsons DR, Treves A. Evaluating how lethal management affects poaching of Mexican wolves. *R Soc Open Sci*. 2021;8(200330).
5. Treves A, Naughton-Treves L, Shelley V. Longitudinal analysis of attitudes toward wolves. *Conserv Biol* [Internet]. 2013;27(2):315–23. Available from: <http://www.ncbi.nlm.nih.gov/pubmed/23293913>
6. Hogberg J, Treves A, Shaw B, Naughton-Treves L. Changes in attitudes toward wolves before and after an inaugural public hunting and trapping season: early evidence from Wisconsin's wolf range. *Environ Conserv*. 2015;43(1):45–55.
7. Browne-Núñez C, Treves A, MacFarland D, Voyles Z, Turng C. Tolerance of wolves in Wisconsin: A mixed-methods examination of policy effects on attitudes and behavioral inclinations. *Biol Conserv*. 2015;189:59–71.
8. Chapron G, Treves A. Blood does not buy goodwill: allowing culling increases poaching of a large carnivore. *Proc R Soc London B Biol Sci* [Internet]. 2016;283(1830):20152939. Available from: <http://rspb.royalsocietypublishing.org/content/royprsb/283/1830/20152939.full.pdf>
9. Treves A, Artelle KA, Darimont CT, Parsons DR. Mismeasured mortality: correcting estimates of wolf poaching in the United States. *J Mammal*. 2017;1–9.
10. Treves A, Langenberg JA, López-Bao J V., Rabenhorst MF. Gray wolf mortality patterns in Wisconsin from 1979 to 2012. *J Mammal* [Internet]. 2017;98(1):17–32. Available from: <http://dx.doi.org/10.1093/jmammal/gyw145>
11. Haber GC. Biological, Conservation, and Ethical Implications of Exploiting and Controlling Wolves. *Conserv Biol* [Internet]. 1996;10(4):1068–81. Available from: <http://doi.wiley.com/10.1046/j.1523-1739.1996.10041068.x>
12. Treves A, Santiago-Ávila FJ, Putrevu K. Quantifying the effects of delisting wolves after the first state began lethal management. *PeerJ*.

13. Treves A, Vucetich JA, Rabenhorst M, Cornman A, Indians LRB of O, Indians LRB of O. An evaluation of localized wolf control efforts to prevent subsequent livestock depredation in Michigan. *Nat Resour Rep No 2013-4 Little River Band Ottawa Indians*. 2013;
14. Brainerd SM, Andrén H, Bangs EE, Bradley EH, Fontaine JA, Hall W, et al. The effects of breeder loss on wolves. *J Wildl Manage*. 2008;72(1):89–98.
15. Milleret C, Wabakken P, Liberg O, Åkesson M, Flagstad Ø, Andreassen HP, et al. Let's stay together? Intrinsic and extrinsic factors involved in pair bond dissolution in a recolonizing wolf population. *J Anim Ecol [Internet]*. 2017;86(1):43–54. Available from: <http://dx.doi.org/10.1111/1365-2656.12587>
16. Wallach AD, Izhaki I, Toms JD, Ripple WJ, Shanas U. What is an apex predator? *Oikos*. 2015;
17. Treves A, Krofel M, Ohrens O, van Eeden LM. Predator Control Needs a Standard of Unbiased Randomized Experiments With Cross-Over Design. *Front Ecol Evol*. 2019;7(December):1–14.
18. Eeden LM Van, Eklund A, Miller JRB, Lopez-Bao J V, Chapron G, Cejtin MR, et al. Carnivore conservation needs evidence- based livestock protection. *PLoS Biol*. 2018;16(9):1–8.
19. Bruns A, Waltert M, Khorozyan I. The effectiveness of livestock protection measures against wolves (*Canis lupus*) and implications for their co-existence with humans. *Glob Ecol Conserv [Internet]*. 2020;21:e00868. Available from: <https://doi.org/10.1016/j.gecco.2019.e00868>
20. Santiago-Ávila FJ, Cornman AM, Treves A. Correction : Killing wolves to prevent predation on livestock may protect one farm but harm neighbors. *PLoS One*. 2018;209716.
21. Decesare NJ, Wilson SM, Bradley EH, Gude JA, Inman RM, Lance NJ, et al. Wolf-Livestock Conflict and the Effects of Wolf Management.
22. Davidson-Nelson SJ, Gehring TM. Testing fladry as a nonlethal management tool for wolves and coyotes in Michigan. *Human–Wildlife Interact*. 2010;4:87–94.
23. Gehring TM, VerCauteren KC, Provost ML, Cellar AC. Utility of livestock-protection dogs for deterring wildlife from cattle farms. *Wildl Res*. 2010;37(8):715–21.
24. Vucetich J, Nelson MP. Wolf hunting and the ethics of predator control. In: Kalof L, editor. *The Oxford Handbook of Animal Studies*. Oxford, UK: Oxford University Press; 2014.
25. Santiago-Ávila FJ, Lynn WS, Treves A. Inappropriate consideration of animal interests in predator management: Towards a comprehensive moral code. In: Hovardas T, editor. *Large Carnivore Conservation and Management: Human Dimensions and Governance*. New York: Routledge; 2018. p. 227–51.
26. Midgley M. *Animals and Why They Matter*. Athens, GA: University of Georgia Press; 1998.
27. Donaldson S, Kymlicka W. *Zoopolis: A political theory of animal rights*. Oxford, UK: Oxford University Press; 2011.
28. Treves A, Santiago-Ávila FJ, Lynn WS. Just preservation. *Biol Conserv*. 2018;229(January):134–41.
29. Santiago-Ávila FJ, Lynn WS. Bridging compassion and justice in conservation ethics. *Biol Conserv [Internet]*. 2020;248:108648. Available from:

- <https://doi.org/10.1016/j.biocon.2020.108648>
30. David P. Ma'iingan and the Ojibwe. In: Wydeven AP, Van Deelan TR, Heske E, editors. *Recovery of Gray Wolves in the Great Lakes Region of the United States*. New York: Springer; 2009. p. 267–77.
 31. Kimmerer RW. *Braiding sweetgrass: Indigenous wisdom, scientific knowledge and the teachings of plants*. Milkweed Editions; 2013.
 32. George KA, Slagle KM, Wilson RS, Moeller SJ, Bruskotter JT. Changes in attitudes toward animals in the United States from 1978 to 2014. *Biol Conserv* [Internet]. 2016;201:237–42. Available from: <http://www.sciencedirect.com/science/article/pii/S0006320716302774>
 33. Manfredo MJ, Sullivan L, Don Carlos A, Dietsch AM, Teel TL, Bright AD, et al. *America's Wildlife Values The Social Context of Wildlife Management in the U.S*. Fort Collins, CO; 2018.
 34. Koval MH, Mertig AG. Attitudes of the Michigan public and wildlife agency personnel toward lethal wildlife management. *Wildl Soc Bull*. 2004;32(1):232–43.
 35. National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. 2016.
 36. Treves A, Santiago-Ávila FJ. Myths and assumptions about human-wildlife conflict and coexistence. *Conserv Biol*. 2020;00(0):1–8.
 37. Lynn WS. Barred owls in the Pacific Northwest: An ethics brief. In Worcester, MA: George P. Marsh Institute, Clark University; 2012.
 38. Lynn WS. Bringing Ethics to Wild Lives: Public Policy for Barred and Northern Spotted Owl. Ogra M, Urbanik J, editors. *Soc Anim Spec Issue Wildl*. 2018;26(2):217–38.

¹ It is worth noting that wolf predation on domestic animals is minor from an industry perspective, with 86 confirmed and probable wolf-related losses (<https://dnrx.wisconsin.gov/wdacr/public/depredation/2020#confirmedDepredations>) among over 3.4 million head of cattle in Wisconsin in 2020. Compensation is provided for losses.

Dear Wolf Harvest Advisory Committee,

Thank you for the opportunity to present my thoughts on regulations for the 2021-22 Wisconsin wolf hunt. My name is Theresa Simpson. I earned my master's degree from UW-La Crosse in 2019; I examined 18 years of wolf monitoring data of the Central Forest (CFR-WMU Zone 5) wolf packs to detect which habitat variables influence wolf pack success. My research showed wolf pack demographics for packs in marginal habitat (more roads, more agriculture and less public land) were so adversely affected that these packs failed to carry over offspring to the following year, thus failed to thrive as a pack (Simpson, 2019; under peer review). I have been a volunteer tracker for the WDNR since 2012 and am a member for the Timber Wolf Information Network. I am a non-consumptive wildlife consumer. I do not hunt though I am not opposed to hunting.

The February 2021 Wisconsin wolf hunt regulations openly ignored all fair chase hunting ethics practiced by hunters in North America for over a century. Wolves have not been hunted so brutally since the days of bounties and extirpation.

I believe several hunt regulations made possible the orchestrated kill, not hunt, of Wisconsin's wolves during the rushed February 2021 wolf hunt, facilitating the set wolf quota to be exceeded by 83% (Wisconsin's Green Fire Conservation Bulletin, 2021). I have listed them in in no significant order:

- 1) the number of permits sold was doubled, which significantly increased the number of hunters able to participate in the hunt, an advantage when using dogs.
- 2) permits were not issued by wolf hunt zone, allowing hunters to fluctuate from zone to zone in response to closures.
- 3) hunting was allowed 24 hours a day with the use of night vision equipment, definitely not fair chase.
- 4) hunters were allowed 24-hours in which to report a harvest, allowing last minute reports that hamper appropriate zone closure time, thus increasing the risk of exceeding quotas.

I hope the committee will also consider the following as you develop the next Wisconsin wolf hunt regulations:

- a) There could be no accurate wolf population count for the 2020-2021 season, making the setting of quotas difficult. The February 2021 hunt took place before winter track surveys were completed and at the height of the wolf breeding season. This disruption of breeding and the inevitable killing of breeders and pregnant females makes an accurate population count all but impossible. Quotas should be for minimum harvest, as an accurate population count is not available.
- b) Wisconsin's Green Fire Conservation Bulletin (2021) analyzed wolf hunt mortality locations and found that most of the wolf harvests occurred in core (optimal habitat), while most of the

confirmed wolf depredations occurred in marginal habitat (Simpson, 2019). If one of the purposes of a wolf harvest is to address/decrease wolf conflicts, harvests should be focused in marginal areas where most of the wolf conflicts occur.

c) As reported by the WDNR, 85% of the wolves harvested were done through the use of dogs. We are the only state that allows this hunting practice. Hunting canines with canines is the same as inciting dog fighting. Using six canines-which can be refreshed at any time-to run down one canine is barbaric from two directions. First it is unfair chase for the wolf; second, if the chase ever leads to wolf on dog, it is cruel and unfair to the dog.

d) I ask that the committee follow the science. The WDNR has successfully managed the wolves in Wisconsin since 1979. They have all the scientific tools with which to manage Wisconsin's wolf population. We and the NRB should let them do just that. The WDNR is not blind to the needs of all interested parties. I have no doubt they will do a fine job walking the tightrope between interested (and conflicting) parties. PLEASE let them do their job.

Thank you very much for your time and consideration.

Sincerely,

Theresa Simpson

BS Zoology-Oklahoma State University

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References:

Wydeven, A., F. Clark, T. Daulton, P. David, T. Hauge, J. Habush-Sinykin, S. Peterson, H. Stricker, and T. Van Deelen. 2021. The February 2021 Wisconsin Wolf Hunt: A Preliminary Assessment. In WGS Cons Bulletin.

Simpson, T.L., 2019. *An eighteen-year spatial and temporal analysis of the recolonization of a disjunct population of gray wolves (Canis lupus)* (Diss).

Comment by Prof. Adrian Treves, PhD, on Revision of Wolf Management Plan and Quota for 2021 Wolf Hunt

May 15, 2021

To: Wisconsin Natural Resources Board,
Wisconsin Department of Natural Resources,
Wolf Management Plan Committee, and
Wolf Harvest Advisory Committee

Via: Randy Johnson, WDNR Large Carnivore Specialist, Randy.Johnson@wisconsin.gov
Laurie J. Ross, Board Liaison, Laurie.Ross@wisconsin.gov

Re: Setting Quota for 2021 Wolf Hunting Season and Revision of Wolf Management Plan

Thank you for the opportunity to comment on Wisconsin's wolf management planning and the formulation of guidelines for a November 2021 wolf hunt. I am a Wisconsin resident and a professor at the University of Wisconsin in Madison. Specifically, I am a wolf ecologist and the founder of the Carnivore Coexistence Lab. I conduct interdisciplinary research on the human dimensions of wolf management and the law relating to coexistence with gray wolves. I have published more than 134 peer-reviewed scientific articles on ecology, management, and conservation. I have been investigating human-wolf coexistence in Wisconsin since 2000, with my most recent peer-reviewed scientific article on Wisconsin wolves published on May 10, 2021.¹

I will address four issues in my comments, and for the sake of brevity, will include supplemental information on each topic in appendices for your review, as well as providing a collection of scientific articles that are relevant to the critical issues.

First, as the Wisconsin Department of Natural Resources (DNR) revises its plan for the management of gray wolves, and takes immediate action to set a quota for the fall 2021 hunt, it must consider those actions in context of its role as a trustee, which must manage and conserve wildlife populations, including wolves, on behalf of current and future generations. I thus preface my comments on these upcoming decisions with a summary of my assumptions about the responsibilities of a public trustee, based on my extensive research about the duties in caring for a public asset such as wolves.

Second, because a trustee cannot manage an asset responsibly without full information, I describe the information and data that DNR must have before it makes management decisions about the Wisconsin wolf population, to avoid substantial impairment of that public asset.

Third, I discuss the lessons we have learned from the past history of Wisconsin wolf management and policy, drawing on my research into ecology, human dimensions of wildlife management and law. Finally,

¹ My full curriculum vitae is at http://faculty.nelson.wisc.edu/treves/archive_BAS/Treves_vita_May2021.pdf. Publications cited in this comment and its appendices are indicated by "[X]", and are listed in Appendix 3 - Collected References. Except for cited books, all are available at the embedded links, and/or are gathered here: http://faculty.nelson.wisc.edu/treves/archive_BAS/Public_comment_2021.zip. For access to the cited books, or if you have trouble accessing any other publications, please contact me at: atreves@wisc.edu.

since I believe DNR must set realistic expectations for its wolf management goals, I end with a caution about what the science tells us that public wolf-hunting cannot achieve.

I. Duties Of A Wildlife Trustee

Before DNR makes a decision about how to manage the wolf population, it must frame that decision in terms of how it interprets its duties as a public trustee of that wildlife asset. As a scientist working for a public institution, I believe I have my own duties as a public trustee, to provide the agency and the public with the best available science and help them to interpret diverse facts. I have extensively studied and published on the subject of the duties of a wildlife trustee, and I propose three primary principles to guide DNR's management decisions, including the decision on the upcoming fall 2021 hunt.

- First, the highest-priority duty for a wildlife trustee is to ensure that the health of wildlife populations is not substantially impaired. In the context of the Wisconsin wolf population, this means: (a) avoiding actions that will risk lowering the population to state listing level of 250; (b) protecting the renewal capacity of the public asset, by preventing harm to the reproductive capabilities of the wolf population; (c) preventing any harm to the wolf population that would result in the federal government removing the state from its trustee position by placing wolves back on the federal Endangered Species list--thus putting the U.S. Fish and Wildlife Service in the role of primary trustee; and (d) if any actions have already been taken that risk the harms detailed above, putting a plan in place to ensure that this damage is repaired.
- The second priority for a wildlife trustee is to preserve wildlife for future generations. This requires: (a) prioritizing future generations' interests in preservation over current users' interests in exploitation; (b) regulating use by current generations with precautions taken to protect against errors; and (c) preventing illegal, unregulated, or undetected uses that drain the public asset.
- Finally, the third priority for a wildlife trustee is to act transparently, so that the public on whose behalf it is managing the asset can see that it is doing so responsibly, effectively, and cost-efficiently. That requires: (a) demonstrating the use of the best available science and information to protect wildlife and regulate human uses; (b) providing accountability to all trust beneficiaries; (c) correcting errors forthrightly and honestly; (d) acting in a manner that is incorruptible and is not unduly influenced to favor one class of beneficiaries over another.

In Appendix 1, attached, I fully explore each of these trust responsibilities in the context of Wisconsin wolf management, with citations to scientific support.

This support includes a study that my colleagues and I have submitted for review, which concludes that during the February 2021 hunt, the state trustee allowed just over 300 wolf-hunters and wolf-poachers to reduce the state wolf population by 27-33%. We predict that in order to allow the wolf population to recover from this impairment, the state would need to protect it from hunting or high rates of government lethal control for several years, assuming that reproduction has not also been substantially impaired.

II. Data DNR Must Have to Avoid Substantial Impairment of Trust Asset

As I detail in Appendix 1, Wisconsin could suffer from a substantial impairment to its wolf population as a result of: 1) damage to or deterioration of the reproductive output of the wolves; 2), numerical depletion of the wolf population; or 3) deterioration or loss of ecological functions in the wild ecosystems of the state.

My primary concern with the future of Wisconsin wolf management is that DNR does not seem to have sufficient information to assess the status of the wolf population, to determine if there has already been such a substantial impairment, especially following the February 2021 wolf hunt, or to allow it to measure the effects of future actions to prevent them from causing substantial impairment to pack reproduction, ecological function, or a self-sustaining healthy population. If DNR has this information, it has not been shared with the public, who are the beneficiaries of the wildlife trust resources that DNR manages on our behalf.

Before DNR takes additional actions that may impair the Wisconsin wolf population, such as setting a quota for any future wolf hunts, it must have information necessary to evaluate the current status of the population, and quantify the threats posed to pack reproduction, juvenile recruitment, ecological functions, and natural ecological interactions. I suggest that the revision of the Wolf Management Plan include processes to gain this baseline of information, to update it regularly, and to present it to the public in an accurate, precise, reliable, and unbiased form. The information needed to make responsible management decisions includes the following:

1. Number of wolf packs in the state and how many breed successfully each year
2. Number of wolves in each pack
3. Survival of juveniles and causes of death by November each year
4. Survival of adults and causes of death each year
5. Locations of illegal kills and methods and motivations of poachers) those who kill wolves illegally)

6. Effectiveness of non-lethal and lethal methods of protecting domestic animals from wolf predation
7. Detailed records of marked wolves (collared or otherwise tagged) from marking until death or disappearance, including locational data and cause of death or disappearance
8. The ecological effects of human-caused wolf mortality, including evaluation of the effects of intentional killing, whether by the public or by government agents
9. Reliable social science data on attitudes to wolves and tolerance for various scenarios involving coexistence with wolves, inclination to poach wolves, and support for DNR policies, measured in a uniform random sample of state residents and out-of-state hunters
10. Veterinary and pathological information on diseases and causes of death for a relatively large random sample of recovered wolf carcasses
11. Other information on changing rates of nonhuman causes of death or reproductive impairment each year
12. Critically, the effect on the wolf population after wolves were killed, nearly twice the state “quota,” in February 2021, and illegal kills since April 2020

Very little of this information is currently available. Until DNR has gathered sufficient baseline data, and set up processes to monitor changes, it should not make any additional decisions out of ignorance that may endanger the state wolf population, and violate its primary duties as a trustee.

III. Lessons Learned from History of WI Wolf Management

I have spent substantial time studying Wisconsin’s record of wolf management, and the science on which it has been based, and I have detailed much of this work in **Appendix 2**. As DNR revises its Wolf Management Plan and sets up future hunts, it is crucial that it spend time reflecting on the errors that have been made in the past--both so it can correct the damage that has already been done to the state wolf population, and understand how to avoid those same mistakes going forward. My most urgent concerns relate to the state’s conduct of the unprecedented February 2021 wolf hunt, which had the following novel, and alarming, characteristics:

- **Timing.** The hunt was held during the last week in February, so it would overlap with wolf mating season. The state has never held such a hunt before.
- **Methods.** The February hunt allowed night-time hunting, pursuit by hounds in deep snow, and pursuit by snowmobile.

- To my knowledge there has never been any peer-reviewed research about the effects of this combination of methods and timing of a hunt on a wolf population.
- Finally the NRB's explicit desire to set a "conservative" quota for hunting Wisconsin's wolves, suggests a different approach than was taken in the February 2021 hunt. As a scientist, I interpret conservative assumptions or conservative methods as those that are less likely to cause error.

I recommend using the minimum bound of the most reliable and proven population estimate, and the upper bound of background non-harvest mortality. For the latter, I strongly recommend embracing the replicated findings that background mortality increases significantly when wolves are not federally listed, so as to avoid recommending quotas that will damage the wolf population quickly. I counsel against using 'black box' models that are not subjected to rigorous external evaluation and recommend any model be opposed against simpler alternative models. At every step of the process of producing and using science, transparency will support well-informed decisions. Other principles of scientific integrity such as independent review and reproducibility are similarly indispensable.

Likewise, transparency will be an asset for separating personal or agency values from the values of the broadest public, which should take much higher priority. To attain the goals of the broadest public, I recommend against any hunt or any hunting method that targets breeding adults, and recommend in general that the DNR focus on protecting the reproductive capacities of Wisconsin wolf packs when feasible. The most critical intervention for long-term sustainability of the state wolf population will be to enforce anti-poaching laws because illegal killing is the major cause of mortality. Failure to do so seems to favor escalations of wildlife crimes from low rates of overt poaching to high rates of cryptic poaching.

IV. Setting Realistic Goals for What Wolf Hunting Seasons Can Achieve

Finally, since 2005 and accelerating in 2016, my work has focused on evaluating two scientific claims made about hunting as a wildlife management tool. The first claim is that the public will tolerate controversial wildlife better if regulated killing is permitted. The second common claim is that illegal killing will diminish if legal killing is permitted. I present years of evidence from numerous independent sources that contradict both claims (Appendix 3). Furthermore, evidence shows that killing wolves to protect livestock more often backfires and creates additional conflicts. Lethal methods of limiting wolf predations on livestock have also been subject to less rigorous experimental tests than non-lethal methods, which are more likely to reduce such conflict. (Appendix 4).

V. Conclusion

I believe a public trustee should prioritize preserving Wisconsin's wolves for future generations as the highest priority, then secondarily regulating current uses, preventing and repairing unregulated, illegal, or undetected uses, and accounting transparently with the best available science to the broadest public. These duties apply to future wolf management planning and to the coming months before recommending any quota for a november 2021 wolf-hunt. However, I find most of the information

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needed is lacking to act as a responsible trustee and make prudent, science-based, transparent decisions about wolves.

Furthermore, my study of the history of wolf policy suggests such gaps in information are not new and the DNR has experienced many shortcomings in transparency and scientific integrity since 1999. The February 2021 wolf-hunt has created long-lasting uncertainty about the resiliency of wolves in our state and exposed the risks posed by hunting without deliberative, science-based decision-making.

What is needed now is deliberative, reasoned, pluralistic, precautionary policy guided by multiple sources of scientific evidence that have been tested by internationally recognized standards for strength of inference and reliability. I call for careful collection of the needed information by independent, diverse researchers who can and must be allowed to transparently share all information and discuss it before submitting their consensus -- after scientific debate insulated from undue political influence. I call for strict avoidance of the conditions preceding the February 2021 wolf-hunt. Finally, I call for abandoning long-held but erroneous assumptions that recreational hunting of wolves improves human tolerance, reduces poaching, or protects livestock.

Thanks for your attention to the four (4) Appendices attached with this comment,

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P.S. My full curriculum vitae is at http://faculty.nelson.wisc.edu/treves/archive_BAS/Treves_vita_May2021.pdf.

Publications cited in this comment and its appendices are indicated by "[X]", and are listed in Appendix 3 - Collected References. Except for cited books, all are available at the embedded links, and/or are gathered here:

http://faculty.nelson.wisc.edu/treves/archive_BAS/Public_comment_2021.zip. For access to the cited books, or if you have trouble accessing any other publications, please contact me at: atreves@wisc.edu.

Appendix 1 — Duties of a Wildlife Trustee

1. A wildlife trustee's most important duty is not to substantially impair the public asset.

I follow the standard announced in 1892 by the U.S. Supreme Court in *Illinois Central Railroad Co. v. Illinois*, that a public trustee must protect and preserve trust resources from “substantial impairment.” Impairment is defined as “deterioration; injurious lessening or weakening.”^[1] As a scientist, I understand a resource to be impaired when any one of the following conditions are met: (a) the quantity of the resource has been substantially reduced; (b) the ability of the resource to reproduce or perpetuate itself has been weakened, reduced, or deteriorated; or (c) the quality of the resource has been weakened, reduced, or deteriorated.

In the context of the Wisconsin wolf population, I believe DNR, acting as a trustee, has a responsibility to prevent: (a) the wolf population from dropping to the state listing level of 250; (b) an impairment of the population's ability to sustain itself through reproduction; and (c) such harm being done to the population that DNR is removed as the trustee because the species has been placed back on the endangered species list, and replaced by the U.S. Fish and Wildlife Service as a trustee. So much that the state trustee is overruled by the federal trustee (in ESA delisting, the USFWS acknowledged it has a trustee responsibility^[2]); and (d) repairing damage when errors are made. These are affirmative duties, meaning the trustee must act not simply to avoid harm or negligence.

This responsibility leaves us to ask the following questions about Wisconsin wolf management.

A. Has the quantity of the wolf population been weakened, reduced, or deteriorated so much that it cannot recover by November 2021?

In a manuscript that my colleagues and I currently have under review,^[3] we address whether the state trustee has already allowed substantial impairment of the WI wolf population prior to this date. Our manuscript presents an optimistic conservative minimum loss of wolves and maximum population size, not the worst-case precautionary scenario. We conclude the trustee allowed just over 300 wolf-hunters and wolf-poachers to reduce the state wolf population by 27-33%. We predict that putting wolves back under endangered species protection for several years (without hunting or high rates of government lethal control) would allow the population to recover numerically from the 2021 impairment, if reproduction was not also substantially impaired substantially also.

B. Has the reproductive potential of the Wisconsin wolf population—in other words, the potential for the population to replenish its quantity and quality—been weakened, reduced, or deteriorated so much that it cannot recover by November 2021?

We do not know the answer to this question definitively, but the February 2021 wolf hunt was an unprecedented hazard for the breeding wolf packs that were hunted (whether an alpha was killed or not). A pessimistic view is that any wolf pack exposed to hunting at that critical period—including pursuit by hounds, snowmobiles, or hunters with lights at night—faced an elevated risk of failed reproduction through the resorption of fetuses, termination of estrous receptivity, separation of alphas or other pack members from the pack, and other stressors.

Appendix 1 to May 15, 2021 Comment of Prof. Adrian Treves

Packs are family units. A pack that loses a member is more likely to fail to reproduce. Each pack contains one alpha male, one alpha female, and supernumerary adults that are often genetic relatives who help protect and raise the young. Therefore, packs disrupted by hunting are less likely to raise a litter of pups in the summer of 2021. How much lower? We don't know exactly, but certainly less than under the best conditions measured by Thiel et al.^[4] Their work tells us that an average of 72% of packs produce pups annually (range 57-89%) under the best of conditions (low-density, recolonizing, full federal ESA protection, no public hunting).

The February 2021 hunt was the worst situation we have seen yet, so a precautionary approach would be to take the minimum values reported by Thiel et al. at every stage of reproduction as follows: I would expect <57% of all wolf packs would breed, following Thiel and that number might decline even further once the state estimates how many wolf packs in total were exposed to hunters and poachers in 2020-2021. The safest precautionary estimate is that only the handful of wolf packs protected in Indian reservations will reproduce in 2021. Beyond estimating the number of packs that produced pups as of summer 2021, Thiel also gives us estimates for survival of pups through November when they are considered independent. Those authors reported an average of 4.8 pups per litter in July (range 3-6) with ensuing survival averaging 0.2 (range 0.05-0.72). The precautionary approach would be to assume a bad year for pups, because so many packs lost adults during the previous year, and parents and supernumerary adults help to feed and protect pups.

Taking the minimum values in each range above, only 22 pups would survive to November 2021, leading to a predicted 21% decrease in recruitment of young into the population by November. The only way to be sure this pessimistic scenario is not realized would be to count pups in July in all wolf packs and measure those pups' survival in the following 6 months. To do so, the DNR should validate counts with blind tests of interobserver reliability, given experimental evidence of inaccuracy of howling surveys used to estimate pup numbers.^[5]

C. Beyond (A) the numbers of adults alive, and (B) the numbers of pups born in 2021, what can we say about the quality of the wolf population resource in 2021?

Quality is an understudied aspect of predator populations. There has been some work on ecological functionality or ecological effectiveness of large predators.^[6,7] Although there is little consensus on this topic yet, most experts agree that social, gregarious predators exert their full functional ecological effects—hunting prey, defending territories, forming social networks or families—when unexploited in wild ecosystems. Creel and Rotella^[8] showed that any level of human-caused mortality is associated with slow-downs in population growth, hence reproduction is likely to be affected no matter how light the human-caused mortality.

Wisconsin has rarely had ecosystems without human influence,^[9,10] but it would not be correct to say wolves in Wisconsin exert their functional, ecological roles under any level of human disturbance and exploitation. We know that wolf packs in Wisconsin may disband when they lose alphas.^{11]} Disbanding represents the loss of the functional, ecological role of that wolf pack in its local area for one year or more. We also know that small Wisconsin wolf packs (2-3 adults) were more likely to fail to reproduce and disband than large wolf packs,^[6-11] and that smaller wolf packs were more likely to attack farm animals in Wisconsin and beyond.^[12-15] Also, Santiago-Ávila et al.^[16] studying wolf-killing in the neighboring state of Michigan, reported that risk for cattle tripled after only one wolf was killed in a neighboring township. The net change in risk across all spatial scales was +25% after one or more wolves was killed and regardless of the number of wolves killed at a site.

Therefore, the February 2021 wolf-hunt likely changed the functional, ecological effect (quality) of wolf packs that lost ANY individual during the hunt. The change would likely be towards more farm animal predation in 2021,

higher chance of pack disbandment, lost reproduction, and less competency in hunting, defending a territory, and raising young. Moreover, when packs disband the survivors typically disperse, which may lead to more solitary wolves. Solitary wolves outside their familiar territories suffer higher mortality,^[17] may disrupt neighbors or prey on domestic animals at a landscape scale, may get into more vehicle collisions leading to property damage and loss of human life or emigrate from the state of Wisconsin to less disturbed habitats. Any tourism oriented around wolf packs may have to adjust to the disbandment of some packs and perhaps to surviving wolves' greater fear of people.

Although each statement above has a probability that it may or may not occur, the entire scenario is not speculative. We know exploited wolves respond by pack disbandment and individual dispersal.^[11] All of the above changes alter the quality of the surviving wolves, above and beyond any loss of wolves or pups.

2. The second-highest priority for a wildlife trustee is to preserve uses for future generations.

Preserving a resource for future generations requires (a) prioritizing future generations' interests in preservation over current users' interests in exploitation; (b) regulating use by current generations to sustainable levels with precautions against errors; and (c) eliminating illegal, unregulated, or undetected uses that drain the public asset. Illegal uses should count against the share for legal consumptive users, not be discounted. When counting current users among the many beneficiaries, the trustee should distinguish those users who expend the asset for private benefit or for the benefit of the government and prioritize users who do not expend the asset. These are affirmative duties meaning the trustee must act protectively and remedially not simply to avoid harm or negligence.

A. Few Wisconsin Current Adults Want to Hunt Wolves.^[19]

Even among hunters, our surveys showed how few hunters wanted to use dogs or traps.^[20, 21] Yet >80% of wolves were killed by hound hunters and our 2021 manuscript under review estimates that 218 hunters and <105 poachers took >27-33% of the population.^[3]

B. NRB Focused on Maximizing Hunter Access.

Rather than acknowledging the competing interests in wolves (tribal versus state first by federal treaty, then future generations versus current generations, then state non-consumptive users versus consumptive users), the NRB (and to a lesser extent DNR) focused on maximizing hunter access and opportunity by discussing low fee structures, emphasizing no zone closures, and doubling the number of permits issued.^[18] Non-consumptive users are also disenfranchised by the payment structure created by the government (wildlife feeding requires a permit called a hunting permit, donors to wolf compensation funds were anonymous until 2012; state park fees are not counted towards the wildlife budget).^[22, 23]

C. Illegal Uses Of Wolves Were Not Counted Correctly And Were Not Counted Against the Quota.

Since 2014, I expressed concern that DNR was not counting mortality correctly, and specifically that it had under-estimated poaching in 2012 and 2014.^[24] In 2017, we proved this arithmetically twice.^[25, 26] In 2019 and again in 2020, we showed that collared wolves in Wisconsin were disappearing at very high rates most likely due to illegal killing, and we showed the DNR how to estimate and model that rate more accurately.^[3, 27-31] We also showed that illegal killing outpaced legal killing since 1980, and that illegal killing increased when wolf-killing was legalized and liberalized. None of this was properly accounted for on February 15, 2021, when DNR recommended a quota for legal wolf-killing and claimed background non-harvest human-caused mortality was 14%. As a result of taking our estimates into account, scientists would find that half of the recommended quota would already be dead from poaching and additional, new mortality between November 3, 2020 and April 14, 2021.^[3] That in itself would have more than halved the recommended quota.

D. The affirmative duties of a trustee include strict enforcement against illegal uses and reparations for losses of public assets.

Performing the duties of a trustee might include conducting law enforcement investigations, community policing, and public relations campaigns informing hunters the legal quota would be diminished by illegal killing. We did not see such efforts and indeed, collection of information from legally killed wolves was curtailed. For example, DNR did not ask hunters to turn in wolf carcasses for inspection, as would have fallen within its discretionary authority.^[3] Such carcass inspections are valuable for discerning causes of death, sexing wolves, aging wolves, and collection of reproductive tracts to estimate how many breeding females were killed.^[32] Hunter self-reports are no substitute because they lack information on reproductive status of females, and age estimation is guesswork by untrained individuals. Even DNR biologists have made substantial errors in age estimation based on size of wolves.^[25] Furthermore, failure to collect more than the 20 carcasses voluntarily turned in by hunters made it impossible to measure whether illegal methods such as hound bites or poison had been used.

3. The third-highest priority for a wildlife trustee is to prove transparently that it is doing the above priorities effectively and cost-efficiently.

This type of transparency requires (a) sophisticated, clear accounting using the best available science for wildlife protection and regulation of human uses; (b) accountability to all the beneficiaries; (c) correcting errors in the record forthrightly and honestly; and (d) the trustee must be incorruptible and independent of beneficiaries.

A. Balancing competing interests among beneficiaries

For the relationships to beneficiaries and trustee accountability, I draw the DNR's attention to work on the duties of public trustees.^{[23, 33-40] [41-46]}

One of the most challenging actions for a trustee will be to balance competing interests among legitimate beneficiaries. I provide an example below that includes future generations as first priority, then current users secondary with a federally imposed balance between Ojibwe tribal interests and wolf-killing interests as a subcomponent of current users, though not the entire universe (see above). For example, the decision to hunt wolves (or to challenge an existing hunting system) would pit current adult human groups against each other, such as the Ojibwe tribal governments against the largely Euro-American, male carnivore-hunters in Wisconsin.^[47-49] We present a hypothetical example of the very different demands each such current human group might make in **Figure 1**. Similar competing interests might be analyzed and considered equitably for non-anthropocentric interests, which would not play out quantitatively in terms of wolf-killing but qualitatively in terms of individual, community, and aggregated biotic well-being and health. The caption of **Figure 1** explains why a trustee-advocate would have to understand the science, the ethics of decision-making, the law, and the competing interests within their constituency to balance those interests and argue for their constituents as a whole.” Internal citations updated).^[38]

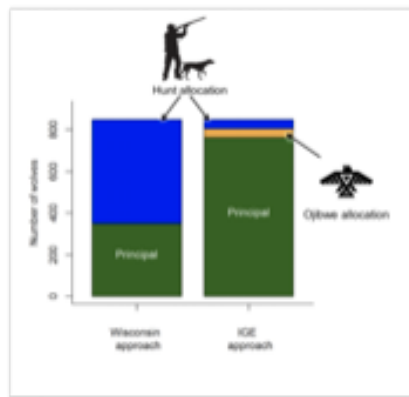


Figure 1. Schematic drawing of hypothetical competing interests between two current adult human groups. These are just two of the current adult human groups that have an interest. LEFT: The Wisconsin approach represents state government policy as of 2020 with a population goal at 350 wolves (green), the remainder of the wolves being allocated only to wolf-killing interests, i.e., private citizens hunters, trappers, and livestock owners via permits (blue). RIGHT: The Intergenerational Equity (IGE) approach is a hypothetical one in which the legacy of 815 wolves transferred from the U.S. federal government to the state and tribes in 2012 would be defined as the principal for future generations (green). Then federal treaty rights negotiated with Ojibwe nations grant equal authority (orange). Finally, current users would be allocated only half of the interest on the principal (narrow blue slice) equaling half of annual growth. The competition would be over how many wolves to preserve (green) and how many to use (blue). This debate is highly anthropocentric and includes trivial human desires such as recreation (wolf-hunters Treves & Martin. 2011; Santiago-Ávila et al. 2018) and intangible interests such as spiritual preferences (Ojibwe traditionalists, David 2009, Shelley et al. 2011, Fergus & Hill 2019) respectively, without acknowledging the interests of the wolves. Although this hypothetical example is largely between competing adult human interests it remains unjust for nonhumans.

B. B. Trustee Must Understand and Follow Science and Principles of Scientific Integrity

To know how to provide a clear and sophisticated accounting, DNR and other trustees should understand and follow the dictates of scientific integrity. Science is the best way of understanding the

universe ever found by humans, and it works by observing phenomena to explain the causes of those phenomena or predict their consequences. By observation, I mean measurements and descriptions of all sorts. By phenomena, I mean any material, process, or event. By cause and consequence, I am referring to cause-and-effect relationships among objects, events, and processes.

The fundamental building blocks, without which we do not recognize science, are transparency and reproducibility. Decades of scientific work have explored gaps in scientific integrity that reduce the validity or applicability of scientific studies.^[50-105] Below I summarize the decades of work that the preceding citations represent. There are other elements of scientific integrity that are important such as enhancing fair-mindedness and protecting the subjects of research if they are sentient or can otherwise be harmed. I refer the interested reader to extensive work on these topics, but I restrict myself to the fundamental building blocks of transparency, reproducibility, and independent review because experience across many disciplines shows that this where errors in science most commonly arise.

Transparency is the most fundamental principle of scientific integrity because without clear communication or representation of methods and results no one — not even the original observer — can describe what they observed and repeat it. By methods and results of observations, I include clear descriptions of all assumptions, inputs of data, materials, inputs of skills, instruments, steps, analyses, procedures, and the intermediate results and final outputs. I recommend DNR put priority on transparency of data, assumptions, analyses, and models because the history of wolf science by the state and its allied scientists has been marred by gaps in transparency,^[16, 28, 36, 106] including omission of methods, omission of population models, keeping data sets secret, and failing to disclose financial and non-financial competing interests.

By reproducibility I mean the ability to repeat all methods and replicate all findings. If a result is not reproducible by the first observer to the satisfaction of others, or better yet by others following the clear instructions, the result is not science. That is how transparency is linked to reproducibility. I recommend DNR use reproducibility as a litmus test for its scientific claims. Again the history of wolf science by the state and its allied scientists has been marred by irreproducible results.^[28, 36, 107-110] (See **Appendix 2** for a discussion of lessons learned about irreproducible quota-setting in 2021).

With transparency and reproducibility, the single observer on their own in the universe might do science and be satisfied. However in the real world, scientists communicate their findings to others and sometimes others choose to make use of the findings. Thus a third foundation of science is independent review. Without transparency, no such communications would be possible. If other observers cannot replicate or use the findings, the knowledge is unlikely to persist for long. Hence, independent review pre- and post-publication help to transfer knowledge and assure its utility in the long-term. I recommend DNR engage authentically independent review. with public disclosure of potentially competing interests suitably anonymized to protect individual scientists from unfair accusations or scrutiny. Again, the history of wolf science in Wisconsin shows gaps in the independence of review.^[35, 36, 92, 96, 106]

With the three fundamental building blocks of transparency, reproducibility, and independent review above, I have described a system that could adjudicate between competing claims about the universe. Different observers or even the same observer holding different perspectives (or opposed hypotheses) in mind, might come up with competing observations or inferences.^[111] This leads me to describe a fourth fundamental principle of science.

Some observations and inferences are stronger than others where better refers to their accuracy, precision, or reliability (validity hereafter). I have written extensively about strength of inference.^[112] At times, competing scientific claims or competing methods are applied to the same societal questions and these competing scientific claims or methods can be judged relatively more or less valid. Even untrained observers can learn to distinguish more and less valid scientific findings by their methods. Take for example, the difference between pure observation and controlled experiments. The history of science is littered with hundreds of examples of where controlled experiments have superseded observations or even sophisticated correlations because the method of controlled experimentation yields stronger inference. Likewise, methods of observation are weaker or stronger as the steady progress of technological advances in microscopes has illustrated. Similarly in other areas of science, weak methods of observation have been superseded by stronger ones, such that one can no longer publish science with out-of-date methods. Progress in science reflects both advances in methods and improvements in independent review to detect shortcomings in research submitted to that review.

Anything that interferes with independent review should be suspect. For an academic scientist like me who cannot claim any research is valid evidence until it has passed peer review, I look askance at many scientific claims made by wildlife agencies that are never subjected to authentic independent review. Scientific journals engage anonymous peer review commonly to bring non-experts such as editors together with content experts (peer scientists) to confer on a new submission before publishing it. Yet post-publication review is equally important because peer review is fallible. And ultimately post-publication review is stronger and lasts forever as peers try to replicate findings and advance understanding of the phenomena, their causes, and their consequences. Scientific journals have begun to recognize the problem that independent review may introduce bias because editors and peer reviewers may be more likely to advance (approve) novel or exciting results and less likely to advance uninteresting confirmatory or counter-theoretical findings. This has resulted in a bias towards publishing flashy results, many of which have proven irreproducible, and not publishing results that reject flashy findings, null results that do not confirm or reject widespread theories, or reject replications of findings that reviewers assumed true.

To counter these biases that can slow the progress of science and lead to wasted resources on false results, many publishers and editors are instituting review processes that begin with independent review of methods prior to data being collected or results analyzed. Therefore, independent review first evaluated the soundness of methods while naive to the wresults. A second round of review follows after data are collected or results analyzed. This form of scientific publication is called a registered report and protects both researchers and reviewers from bias. Although common now in journals, it has only been so in the last few years. A consequence of this is that almost none of the wolf science used in Wisconsin

has undergone such rigorous protection against publication bias. However, one article on Mexican wolf mortality published in 2020 was a registered report.^[113]

This method for producing the best available science has direct and highly relevant implications for Wisconsin wolf science today. The article on Mexican wolf mortality replicates a scientific study of Wisconsin's wolves in many particulars.^[31, 113] It deserves the attention of DNR because it quantifies how much cryptic poaching increases (121% on average) after loosening endangered species protections on wolves. It also shows that poaching switched from more overt to more cryptic during periods with less federal protection and did so independently of the number of wolves removed by the USFWS.^[113]

D. Common Pitfalls In Scientific Integrity Often Arise in Scientific Claims Made by Wildlife Agencies.

The most common pitfall that affects both trained and untrained observers is to judge the validity of science based on whether we like or dislike the results. Stated this way, it seems obvious that an unscientific personal value judgment has interfered with unbiased evaluation of the scientific methods used. There is a common and widely accepted defense against this human weakness when it comes to doing science. That is the method of multiple working hypotheses.^[111] Although in practice many scientists fail at this, it is at least accepted if not enforced. In our current context there are a few examples of failures from Wisconsin wolf science. For example, some papers have approached our work with a preference for a particular result, yet provided zero additional evidence for their preferred negative density-dependent growth in Wisconsin's wolf population from 1995 to 2012.^[114-116] As we demonstrated, two show antipathy to the result they are attempting to discredit, and one (Ison et al.) makes errors and shows a double standard about evidence that basically suggests they are right because they and state agencies say so.^[109, 110] Arguments without evidence are unscientific. The previous debate illustrates the problem of favoring results rather than better methods.

Another common pitfall is to dismiss science for spurious reasons to conceal that politics or other influences prefer policies that are not supported by the science. Common objections to science that agencies do not like in my experience is to label it retrospective (this is nonsense because all science is retrospective at some point), or of limited generality because it focuses on one locale or one point in time (this may be a fair criticism if evidence is presented for the greater generality of another finding but in isolation the criticism is anti-science because it asks the listener to trust the greater understanding and experience of the critic without substantiating their own claims. Another common criticism is that the analysts lack experience or authority or a deep understanding of the situation on the ground. Again until evidence is presented for scientific findings that are more transparent, reproducible, or reliable through independent review, this too is an unscientific criticism. Finally, a common pitfall is to take a shortcut through independent review. This takes two forms such as cherry-picking the reviewers so they are like-minded or beholden to the scientist seeking to publish or use the research. A variant is to deny post-publication review and claim that the peer review that allowed something to be published is sufficient. Peer review before publication is necessarily flawed by two common features of scientific review. First, time is short and few if any peer reviewers have the time, resources, or skills to reproduce

findings so they are limited to reading and perhaps re-analyzing data. Second, many peer reviewers have competing interests, often undisclosed ones that are non-financial when their careers are built on or advance by endorsing certain results. ^[106]

Finally, a common pitfall in scientific methods is incomplete transparency. Often assumptions are not laid bare. Assumptions can materially influence results and there is a clear example of this in Wisconsin wolf science. ^[36] The population model presented in the 1999 wolf management plan^[117] and 2006/2007 addendum^[118] assumed negative density-dependence on wolf population growth and under-estimates state carrying capacity, while simultaneously omitting mention of changes in census methods that would have required an alternative hypothesis for the pattern of population changes. ^[36] Arguably, those unstated and in some cases clearly erroneous assumptions got us in the controversy we now find ourselves. These are not ancient history given the 1999 wolf management plan is still a regulatory mechanism today. Furthermore, we reported a change in poaching rates when wolf census methods changed,^[31] so I alert DNR to the need to study the effects of switching to the occupancy model as it might raise poaching rates. Likewise, we found a very strong effect of winter on the disappearance of radio-collared wolves,^[31] which argues for heightened law enforcement during snow-covered periods without federal protections. In sum, from the standpoint of scientific integrity (and trustee duty to act effectively against illegal actors), cherished assumptions about wolf population growth, census methods, poaching, and legal, lethal management should be reviewed in light of the latest, best available science, with a lens for which science is most transparent, reproducible, and underwent the most strenuous independent review.

Appendix 2 — Lessons Learned from 2020-2021

I have examined the lessons learned from Wisconsin's wolf policy between April 15, 2020 and February 28, 2021, based on scientific evaluation of documentary and oral reports by the DNR and NRB. Of particular interest was the February 2021 wolf-hunt which was unprecedented in several features:

- The hunt was held during the last week in February, so it would overlap with wolf mating season. The state has never held such a hunt before.
- The February hunt allowed night-time hunting, pursuit by hounds in deep snow, and pursuit by snowmobile.
- To my knowledge there has never been any peer-reviewed research about the effects of this combination of methods and timing of a hunt on a wolf population.
- Finally the NRB's explicit desire to set a "conservative" quota for hunting Wisconsin's wolves,^[18] suggests a different approach than was taken in the February 2021 hunt. As a scientist, I interpret conservative assumptions or conservative methods as those that are less likely to cause error. Given the DNR did not present opposed hypotheses and presented only a single quota recommendation, I assume the nature of the concern about a conservative quota reflects the NRB's concern with an error or an outcome that would be criticized by outside parties as excessive; either excessive in the sense of risking the wolf population, or excessive in the sense of an outcome that would shock observers and trigger an action undesirable to the NRB.

I. Sources of Information

In addition to my own research on wolves in Wisconsin since 2000, I had five official pieces of information for my review dating from April 2020 to February 15, 2021: the 2021 greensheet;^[119] an oral testimony from a transcript of the February 15, 2021 NRB special meeting;^[18] an informal, unsigned document in pdf format distributed with the NRB agenda on 22 January 2021;^[120] and the state wolf population report for April 2020.^[121]

Accordingly, I evaluated the wolf science used by the DNR to recommend a quota for the February 22-24, 2021 Wisconsin wolf-hunt. I also consider the responses of the NRB when they set the legal quota. Hereafter I refer to 200 as the recommended quota to distinguish it from the actual legal statewide quota (119) after tribal declaration or actual kill (218). I looked for three elements in particular: an evidence base that seemed as accurate, precise, and reliable as might be expected from current knowledge and technologies, scientific integrity in how evidence was handled (transparency, reproducibility, independent review), and a conservative quota.

II. Evaluation of DNR's Conclusions and Methods

A. DNR's Objective.

The 2021 greensheet made "Quota recommendations to maintain the current population."^[119] That quotation matches the stated objective of the wolf-hunt published by DNR in several other official sites and communications as "to allow for a sustainable harvest that neither increases nor decreases the state's wolf population...The DNR is actively working to prepare for a fall 2021 wolf harvest season through a transparent and science-based process."

(<https://dnr.wisconsin.gov/topic/hunt/wolf/index.html> accessed April 15 2021). I treat the above two statements as equivalent and treat them as the intended goal of DNR.

Despite DNR's objective not to decrease or increase the current wolf population, I note that the NRB questioned that objective several times in oral proceedings, apparently because several members of the NRB seemed to express an interest in lowering the wolf population to the 1999 population goal of 350 wolves outside of Native American reservations.^[18]

Neither the DNR objective to maintain the current population nor the NRB mention of 350 wolves are scientific issues per se. They are not scientific issues because they represent value judgments about how many wolves should be allowed to remain alive in Wisconsin. Science does not tell us what we ought to do. That decision was a value judgment in 1999 not a scientific output^[36] and remains a value judgment today. Nevertheless, the DNR objective to "maintain the current population" and recommend a quota that would attain that objective are recommendations that can be evaluated scientifically. For example, one can ask "Will the recommended quota maintain the current wolf population? What are the risks of decrease or increase? Did the DNR follow a transparent, science-based process in developing that recommendation?"

B. Science Presented on February 15, 2021.

I read the 2021 greensheet and previous greensheets from 2012-2014^[122-124] and I believe that they should summarize the scientific basis for quota recommendations preceding wolf-hunts in Wisconsin.

One immediate conclusion is that the 2021 greensheet^[119] is sparse in details, offers one data depiction (a map of hunting zones), and contains no citations to scientific literature, in contrast to the prior years enumerated above. For comparison the 2012 greensheet contained 22 references to scientific studies, but the 2014 green sheet reduced that number to 2 but included 10 pages of text and 10 data depictions. Although the 2021 greensheet itself seems to lack specifics of the science, there is also the unsigned, informal document presented on January 22, 2021 to the NRB.^[120] That document contains historical data, which I apply when appropriate below.

The 2021 greensheet^[119] explains that the DNR recommended a quota after considering "several factors". The DNR named five such factors and enumerated them along with some explanation of why they may be important to "a transparent and science-based process."

(<https://dnr.wisconsin.gov/topic/hunt/wolf/index.html> accessed April 15, 2021) before recommending a quota. I also evaluate how the handling of factors preceding the recommendation of a quota were or were not “conservative” in the sense defined above.

C. Factors Used By DNR to Recommend a Quota.

1. The “current population” estimate.

DNR used 1,195 wolves as its current population estimate, which I believe is the central point estimate from an unpublished occupancy model due to be published soon. Note this was not the wolf population in February 2021 which would have changed from that of April 2020 by the addition of young of the year that survived to February, the deduction of deaths of any wolf before February 22 when the wolf-hunt began, and by a net change due to migration of wolves from neighboring states. Nevertheless, the common parlance holds the current population estimate to be that of last April, which is referred to as the late winter count and does not include pups born in 2020 that would have been conceived in Jan-Feb 2020 and might have survived to 21 February 2021. Below, I point out scientific problems, lack of transparency, and an approach that is not “conservative” when the DNR uses 1,195 as the current population estimate.

a. April 2020 Population Estimates and How to Interpret Them.

The state population estimate for April 2020 was 1034-1057, presented in May 2020^[121] and again on January 22, 2021 (p.2 item 4).^[120] That estimate took into account the estimate of 1195 (957-1273) in **Figure 2** from an unpublished occupancy model. Therefore, DNR offers various population estimates ranging from 957-1573 depending on methods and their bounds of certainty. Note that the occupancy model estimates for three years running seem to fall above the official state estimate (**Figure 2**).

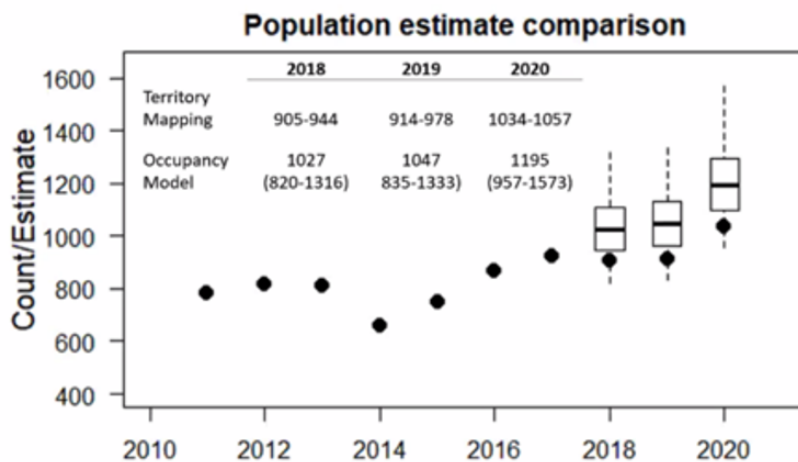


Figure 2. Wisconsin DNR data showing wolf population estimates, taken from <https://dnr.wisconsin.gov/calendar/meeting/42691#:~:text=Time%3A%2011%3A30%20a.m.%20%2D%20%3A30%>

[20p.m.&text=The%202021%20Harvest%20Committee%20Meeting.providing%20Wolf%20Monitoring%20Program%20updates](#) (accessed April 27, 2021).

In the last three years (2018-2020), two methods for counting wolves in Wisconsin are presented for comparison along with the respective values within the graph's frame. The occupancy model provides a range of values that appear to be box plots (open with medians (dark line in rectangles), and first and last quartiles (dashed vertical lines). The older method is presented as point estimates apparently, although they typically have lower and upper bounds as shown in the data table within the frame.

The 1,195 estimate was used in the 2021 greensheet and discussed during the oral component by the DNR and NRB during the oral session. ^[18, 119] However the 1,195 estimate was presented without the uncertainty attached to that estimate. In science, such point estimates are rarely presented without bounds that tell the reader the confidence one should have in the value. Given it would have been trivially easy to mention the bounds, I don't understand why it was not presented, especially given discussion of a "conservative" quota. A conservative quota would use the lower bound of 957 to reduce the risk of error. The 1,195 estimate was presented by DNR without discussion of why it was chosen and not the 1034-1057 or a range of values. Indeed, DNR had an opportunity for DNR to explain when an NRB member questioned 1,195 as too low without presenting his evidence. The DNR might have profited from his apparent interest to discuss confidence in the estimate, the alternative estimates, and why the DNR chose 1,195. Finally, the DNR data presented in **Figure 2**, might have inspired the DNR to claim that 1,195 was conservative relative to the NRB member's unsupported assertion there are more wolves in the state.

Neither did DNR justify its choice of 1,195 scientifically. Indeed that would have been difficult for several reasons. First 1034-1057 is consistent with independent, scientific information on the average size of packs in WI since the 1980s (approximately 4 wolves per pack in the pre-pup late winter count in April ^[125]). In April 2020, the DNR reported the state contained 256 wolf packs, ^[121] hence one would expect 1,024 wolves in the state plus a handful of loners and transients. ^[125] The higher estimate of 1,195 implies on average 42 packs were missed, which is unprecedented in the state wolf population estimate.

Secondly, the occupancy model tends to systematically exceed the census method that has been used in Wisconsin since 1980 (Figure 2), and when one has two independent methods for estimating the same value one does not generally choose the one that has not undergone peer review (as of writing); nor does one discard the one that has years of validation as has the older method that estimates the population with greater certainty (1034-1057 wolves). Although the occupancy model appears to correlate closely to the older method, it does appear to systematically produce higher estimates, which deserves further statistical scrutiny and perhaps adjustment of methods, rather than a single-minded focus on the new method.

Third, the official state report on wolf population monitoring includes methods additional to the occupancy sample and appears to integrate multiple sources of information. Such redundancy creates independent checks on validity as described above.

Fourth, the occupancy model did not exist at the time of the 2012-2014 wolf-hunts (Figure 2) thereby creating the appearance of mixing apples and oranges. Namely they had a comparable population estimate for 2012-2014 with quotas [120], yet they chose to use the output of the new method for counting wolves when deciding on a quota for a wolf-hunt that entailed novel timing with novel methods for hunting.

Finally, the 22 January 2021 NRB meeting at which they chose not to recommend or set a quota, the DNR used 1034 [120]. Altogether, the DNR use of population estimates looks capricious and unscientific.

Scientifically, the conservative approach is to take the lower bound (less likely to make an error that would concern the NRB such as depleting the wolf population too much) which would be 957 for the new method, or use the lower bound of the estimate that is time-tested (1034). My concern resurfaces about applying the new occupancy model below when the DNR claims to apply 2012-2014 experiences in 2021.

Given the DNR emphasis on 1195 in the 15 Feb 2021 NRB meeting and greensheet [18, 119], it seems reasonable to assume that they used that estimate of 1195 when they performed the science described below prior to recommending the quota.

b. Use of April 2020 population estimate Rather than Predicting February 2020 Population.

Regardless of the value selected for the April 2020 “current population estimate, recommending a quota based on April 2020 rather than February 2021 is bound to provide lower confidence in the quota than using the population estimate from February 2021 as the “current population estimate”. Indeed, it is somewhat perplexing that they did not use the information they had at hand on average population growth, births, and deaths. I expect they would answer that they did consider change in the “current population size” from April 2020-February 2021 but did so behind the scenes within other factors. Transparency is better served by explicit mentions. In this case, being transparent would have meant that they would make some effort to estimate the number of births and deaths from April 2020-February 2021.

A population is stable or stabilized when births = deaths in a given reproductive cycle. For wolves that reproduce once per year, when the annual birth rate - the annual death rate = 0 the population should be more or less stable from one year to the next. I write “more or less” for two reasons. First, migration in and out of wild populations is sometimes a large enough factor to be included in the equation $\text{births} - \text{deaths} = \text{net migration (immigration} - \text{emigration)} = 0$ but it is common to assume zero migration and I assume DNR dismissed migration given it never mentioned migration in the meeting in which the quota was set. ^[18] The second reason I write “more or less” is the inevitable fact of measurement error and the inevitable influence of environmental variability that make estimates of birth rates and death rates uncertain. But DNR made mention of the uncertainty about their estimates of death rates during the meeting setting the quota, and no mention at all of birth rates.

To explain why I assert this, I should explain that wolves in the Western Great Lakes region have one birth season each year in May, that pups are counted as adults by November, adults mate in January or February, only one pair per pack mates each winter, and the cycle repeats. ^[126, 127] Therefore, the “current population estimate” in February 2021 would have been estimable from the April 2020 estimate plus births - deaths.

Although migration in and out of the state undetectably creates some error, migration has been dwarfed in magnitude by the residents’ births and deaths since the 1990s. ^[4, 25, 128] Therefore, the DNR could have at least mentioned estimating wolf population size in February 2021 using scientific studies they are well aware of. For example, we have estimated the survival of individual radio-collared wolves and adjusted that survival rate for federal delisting that took place on November 3, 2020. ^[31] We did so in relatively short time frame in a paper under peer review at present and we share it here. ^[3]

Even if DNR chose not to attempt to estimate births and deaths (an uncertain process), it could have adjusted the expected growth rate since April 2020 using our thrice validated estimates of decrements in population growth after that delisting, as predicted in a prior study. ^[108] which has recently been replicated in different population. ^[113] The DNR was aware of both estimates and they were published open access (free of charge), in top international scientific journals. Indeed, a lively debate in 2017 that involved authors they work with closely ensures they knew of the work. ^[110] Moreover all of the results had been presented to the USFWS in 2019 in my official peer review of the Federal Register proposed rule for delisting wolves nationwide including in Wisconsin (with which the WI DNR has long been closely working towards delisting). Also I sent in written testimony to DNR in January 2021, and pointed it to my official peer review for the USFWS and my memo to the White House in September 2020/ ^[129] In prior years 2012-2016, I had also informed Dr. D. MacFarland of the findings at various times in oral and written communications. In short, these studies were known to Dr. MacFarland of DNR, but DNR either did not use this science or was not transparent about it.

DNR should have acknowledged the likely reduction in the population size since April 2020, estimated it, or explained what science they were using to estimate the actual current population size. Neither I nor anyone can assess if they were conservative because the 2021 greensheet presents insufficient information to know how they recommended the quota.

2. “The population’s response to harvest in the 2012-2014 seasons.”

The 2021 greensheet does not explain what “the population’s response to harvest in the 2012-2014 seasons” means. One has to assume the DNR looked at quotas and subsequent population reductions and made some simple assumption that the Wisconsin wolf population response in 2021 would resemble that of wolf-hunts held three times from 2012-2014. I describe several concerns with that assumption in 2A below.

As noted previously, DNR switched to a new method of estimating the population size without justifying that choice. It now claims that consideration of the quotas from 2012-2014 in light of the respective populations counted by the older method would yield insight into its quota recommendation. Common sense in science would have warned them of the potential for error in so doing. If the new census method is highly uncertain (as it is shown to be in **Figure 2**) then the risk posed by a quota of size x is correspondingly uncertain. They should have selected the more certain estimate of 1034-1057 to argue explicitly that the wolf population responses from 2012-2014 would have produced a similar change once adjusted for the recommended quota of 200.

A rebuttal of comparing apples to oranges above might claim DNR considered the ratio of the quotas to the population estimates and the associated estimate of population changes. If so, why didn't it write that? Regardless, the wolf-hunts in 2012-2014 were so different that they might not be comparable. I noted the unprecedented timing and methods used in the 2021 wolf-hunt.^[120] In 2012, hounds were prohibited by court order. In 2013-2014 as far as I know night-time hunting was prohibited by order of the governor. The 2012-2014 wolf-hunts all ended before December 31 in their respective years. All of the differences were predictable, therefore, in my expert opinion DNR only looked at past quotas and population reductions qualitatively. Indeed, oral testimony by Dr. D. MacFarland suggests DNR used a value drawn from the scientific literature (Section 4 below) rather than some synthesis of past wolf-hunts. This factor lacks transparency.

3. "The Current Management Plan."

The current management plan refers to the 1999 wolf management plan and its 2006/2007 addendum. It is unclear to me what element of that plan the DNR would have used other than the above-mentioned reference to the 1999 "population goal" of 350 wolves. Our research has shown that the 1999 wolf population goal was a value judgment not the product of scientific analysis.^[28, 36] Moreover, our research has shown that any scientific analysis presented in that plan was flawed by omission of important information about changes in the wolf census methods and a misleading blurring of the line between value judgments and outputs of scientific models. Therefore, I either ignore the reference to "current management plan" as only implying compliance with the law. Either way I do not address it further with regard to recommending a quota because it lacks transparency, conservative methods, or usable science.

In section 4, I examine the nature and quality of the scientific literature used to recommend the quota. I find the DNR was not transparent about scientific studies that should have informed its recommended quota and failed to weigh which scientific studies were more reliable based on internationally accepted standards of transparency, reproducibility, and independent review.^[50, 82, 106]

4. "The Scientific Literature"

No scientific literature was cited in the 2021 greensheet but during the February 15, 2021 NRB meeting two scientific studies were mentioned by name.^[18, 119] DNR representative Dr. David MacFarland only mentioned two articles from the scientific literature by name (Fuller et al. 2003 and Adams et al. 2008).

They claimed there are two studies when there are at least four such studies in actual fact. Below, I explain why this inaccuracy undermines the scientific basis for the recommended quota, and examine if the scientific literature was examined for birth or mortality.

a. Inaccuracy Undermines Basis for Recommended Quota.

Dr. MacFarland identified two published scientific articles they used to estimate sustainable mortality (24% between the Fuller et al.^[127] model predicting an average of 22% and the Adams et al.^[130] model predicting an average of 29%). Dr. MacFarland appears to assert these are the only two reviews of wolf population dynamics that estimated a sustainable rate of human-caused mortality.^[18] That assertion is incorrect.

One review by Creel and Rotella^[8] who wrote “Contrary to current conventional wisdom, there was a strong association between human offtake and total mortality rates across North American wolf populations. Human offtake was associated with a strongly additive or super-additive increase in total mortality. Population growth declined as human offtake increased, even at low rates of offtake.” (abstract) and that the rate of human-caused mortality annually that would lead to no average reduction or increase in the population was 24.5% (15-34%) for populations other than those of the Northern Rockies.^[8] Note the wide margin of uncertainty that makes the lower bound conservative 15%, not the 24% rate allegedly used by DNR.^[18] Also Vucetich^[131] reported overall lower rates of human-caused mortality needed to stabilize population abundance, in addition to agreeing with Creel and Rotella^[8] that any level of human-caused mortality would trigger a reduction in population growth without compensatory mortality. Vucetich added that that downward trend seemed to accelerate as human-caused mortality increased. Therefore, there are more than two studies relevant to DNR recommending a quota.

DNR chose to use a rate of human hunting of 24% and claimed it was conservative, but it did so while seeming to suggest the lower bound was 22% (Fuller) and the upper bound was 29% (Adams), whereas actually the lower bound was 15% or lower. I had pointed this issue out to DNR in 2017.^[23] Nor did DNR mention that the recent reviews they omitted found no compensation but rather super-additive mortality and accelerating losses as human-caused mortality increases. Therefore 24% is far from a conservative estimate of sustainable human-caused mortality.

b. DNR did not Consider Relevant Scientific Literature.

Below I explain why I find DNR did not consider all of the relevant scientific literature from Wisconsin, did not mention the most recent literature from Wisconsin, nor did it mention that it did (or should) weigh the quality of the science it used compared to the quality of the science it chose to ignore.

Oral testimony is necessarily concise and fragmentary. Nevertheless, the DNR (MacFarland) identified the non-harvest mortality rate DNR used (14%) without citing a source. I assume DNR used Stenglein et al.'s body of work to come up with 14% background rate of non-harvest, human-caused mortality^[133-138]

but I should not have to assume. It would have been simple and transparent to cite her in the greensheet as DNR has done in prior years.^[122] That fails the test of transparency. Moreover, DNR's estimate is too low as recent studies show. I summarize that evidence below.

However, fixing the oversight in using 14% as the annual mortality rate is not settled by citing its source. Several questions remain for a scientist presented with the above information. Why was 14% presented without uncertainty (bounds of error or variability that all scientific estimates come with when one considers measurement error and uncertainty due to annual variability among other things). I see nothing stopping DNR from recommending a range of quotas based on a range of background mortality rates. That would have transparently communicated uncertainty and allowed the NRB to select a single number from within that range of values. That is precisely what we recommended.^[36]

Mortality in particular should always be presented with bounds of uncertainty because there is great uncertainty about wolf deaths in the wild, even when estimating background mortality only from radio-collared wolves. I had explained the problems with mortality estimation to D. MacFarland directly in 2014,^[24] addressing an official DNR document of the time so he is aware of the issue from me and because he is himself a published scientist used to estimating mortality rates. The omission of citation and confidence bounds was not a scientific oversight.

DNR's 14% background non-harvest, human-caused mortality rate does not accord with the published estimates of total mortality of which I am aware. Stenglein et al.^[135] estimated mortality in the years preceding 2012 at 21-24% for radio-collared wolves and Treves et al.^[25] estimated it for adult radio-collared wolves at 19% (standard deviation or sd 9%) and non-radio-collared wolves at 47% (sd 19%). As stated, DNR's 14% estimate was "non-harvest, human-caused". Therefore, if their 14% estimate is to accord with Stenglein's estimate they must have deducted the nonhuman component. However, we have proven with simple algebra that Stenglein et al. miscalculated legal human mortality from 1980-2012 which led to an under-estimate of other human causes of mortality by 17-36 expressed as a percentage of all deaths.^[26] Converting this to an annual rate and using her published 21-24% rate cited above, suggests non-harvest human-caused mortality would actually be 15.5-17.8%. Therefore I infer that the DNR under-estimated the background mortality rate, even if one accepts Stenglein's estimate as accurate for non-collared wolves, which I do not.

Furthermore, Stenglein's estimate comes from radio-collared wolves but I provided an estimate for non-radioed wolves that make up the vast majority of Wisconsin's wolf population and we hypothesized that non-radio-collared wolves suffer higher annual mortality rates,^[25] which could be more than double the rate of radio-collared wolves. Similar differences between collared and uncollated individuals among Alaskan gray wolves,^[139] Polish gray wolves (forthcoming), and wolverines (forthcoming). Furthermore, the most recent estimate published in the best scientific journal to yet publish Wisconsin wolf mortality rates^[31] estimated the background mortality closer to 40-60% (not annually but since a wolf underwent collaring for radio-telemetry, from which one can deduct the cumulative incidence of nonhuman mortality which DNR wished to estimate. Therefore, the conservative approach would be to use the

upper bound of mortality estimates from radio-collared wolves as a minimum and available estimates of mortality among non-radioed wolves to recommend a quota. Neither was done.

c. Failure to Consult with Available Experts.

I am just down the road from the DNR headquarters and easily reachable by phone or by email yet the DNR has not consulted me on wolf mortality since 2012. We made these scientific studies freely available at my lab website, on the publisher's page, referred to them in numerous media reports, and shared with DNR our report to the USFWS on the subject, so I see no reason why Dr. MacFarland would be unaware of the work.

5. Estimated Impacts of Harvest Quotas.

DNR also calculated the quota based on "estimated impacts of various February 2021 harvest quotas resulting from population model projections." Without citation to published scientific studies or transparency about the scenarios, one cannot evaluate what DNR did in the background to recommend a quota.

I surmise the background work employed the models of Stenglein cited previously and van Deelen.^[28] For each one, I mention a concern with the work that raises questions about the design of the model and validity of their findings. For all but the last study, I have previously published my concerns.^[28, 36]

- Van Deelen 2009 used an inaccurate estimate of carrying capacity and omitted mention of changes in wolf census methods that significantly altered the inter annual variability in wolf counts. By representing only one scenario for "maximum sustained yield" (sic), he inserted his own personal value judgment into a state policy debate but did so non-transparently. Furthermore, that model erroneously assumed negative density-dependence without evaluating the evidence that argued against such an assumption.
- Stenglein et al. 2015 did not present reproducible evidence for negative density-dependence on recruitment of juveniles, assumed the effect of policy periods which were fictitious, and failed to account for changes in wolf census methods. Nor did this paper publish data on birth, juvenile survival, and mortality to allow replication.
- Stenglein et al. 2016, 2018 have some of the above flaws and the 2018 papers add a new one. Its model apparently supporting compensatory mortality in Wisconsin's wolves from 2004-2013 took methodological steps that were neither conservative nor justified scientifically. They pooled nonhuman causes of death with unknown causes (cases in which the recovered wolf carcass' cause of death could not be ascertained). We showed that the timing of unknown deaths since collaring was inconsistent with such pooling.^[25, 31] Furthermore, that step tends to under-estimate human-caused mortality adding to the problems noted above.

III. February 2021 Hunt Lacked Scientific Hallmarks Of Sustainability.

Several scientific criteria must be met to claim that killing a quota during a wolf-hunt, “neither increases nor decreases the state's wolf population”. This is called stabilizing the population or managing human-caused mortality to keep it stable. Our work under review at present [3], suggests a 27-33% decrease in the wolf population since April 2020. Therefore by the common scientific interpretation of the question, the February 2021 wolf-hunt was not sustainable because it did decrease the state wolf population. This interpretation is also consistent with the four studies from other wolf populations cited above (Fuller, Creel, Vucetich, Adams).

However, a common everyday use of sustain instead refers to withstanding. Can the Wisconsin wolf population withstand another wolf-hunt or two? That is a different question and one that mingles value judgments with scientific claims. Therefore, I end with a brief look at the NRB’s decisions in February

DNR does not deserve all the criticism for the many instances in which the recommended quota was not conservative. Despite the explicit concern by the NRB that the quota be conservative,^[18] there are two additional aspects of the February 2021 wolf-hunt that, to a scientist, almost guaranteed over-shooting the state quota. The first was the NRB countermanding the DNR recommendation on issuing 10 times the quota in permits (which are opportunities to legally kill a wolf during the season) and deciding to issue 20 times the quota. Because DNR reports being required by statute to alert hunters to impending closures of a zone 24 hours before closing that zone, the high number of hunters holding permits who might have killed wolves after a zonal quota raised the probability that the zonal quotas would be exceeded.

The second decision made by the NRB and emphasized by the chair and at least one other NRB member was to vote on a motion that specified no zone would be closed until the zonal quota was met. Keeping zones open until zonal quotas are met can easily lead to over-shooting the statewide quota. A simple example illustrates why this would be. If the statewide quota were met by over-shooting one or a few zones, the entire wolf-hunt should (by law) end within 24 hours. But if an open zone were not closed until its quota was met, the statewide death toll might continue to climb (as it did) before the statewide wolf-hunt was closed. Therefore, coordinated effort across zones by hunters intent on killing more wolves would not be stopped by DNR in the statutory 24 hour notice period. The alternative, and more conservative approach would be to stop the wolf-hunt when the statewide quota was about to be met, regardless of zonal quotas.

In setting the quota, the NRB^[18] expressed concerns that zones would be closed too early, that hunters would have to pay too much, that the wolf population was larger than scientists estimated, and that the 1999 state population goal had been exceeded in recent years. In the future, I recommend the NRB and DNR work more closely to achieve sustainable outcomes using scientifically conservative criteria.

Appendix 3 — Killing Wolves Does Not Raise Tolerance or Reduce Poaching

One sentence summary: The hypothesis that one can kill animals to conserve their populations requires an indirect mechanism, which has failed to materialize in four independent tests on wolf populations.

1. Introduction

Just as the hydra sprouted two heads where Hercules had chopped off one, some ideas multiply and regrow after decapitation. The idea that people need to kill a few animals to protect the rest (kill to conserve) seems to be such an idea. Called ‘hunt to conserve’ when first exposed to scientific tests, the idea has grown into newer notions sometimes called, ‘blood buys goodwill’ or ‘tolerance hunting’. The underlying idea has deep roots and seems to reincarnate in a new form even if it fails a scientific test. Here we offer opposed hypotheses for why the idea of ‘kill to conserve’ re-emerges in new guises. First, we examine the idea stripped down to its essentials, and second, we present three parallel lines of evidence from wolves that refute the newest variants sprouting from the idea.

Many readers might wonder at the counter-intuitive idea that killing an animal might help to protect the survivors in its own population. We emphasize that we are not discussing killing used to eliminate a diseased animal that threatens the health of other species, nor killing used to remove one species to protect others as is commonly used with non-natives or super-abundant populations harming rarer ones. We are examining the common claim of hunters and some government agencies^[140] that one should kill a few to save their fellows. In human affairs this statement only makes sense if the individual killed poses an existential threat to other members of society and cannot be stopped feasibly in any other way. Take for instance an individual transmitting a deadly pandemic or consider mass murderers, and one begins to see the extremely rare circumstances in which killing the threatening individual might directly save others in its own population. By contrast, the idea behind ‘kill to conserve’ typically involves killing the average animal. And that average animal is doing what comes naturally to its species.

Similarly, people may claim they need to kill wild animals to avoid overpopulation and starvation of those animals. Although decimation of animals may free up resources for the survivors, in the absence of humans the effects of starvation, thirst, and disease decimate some but not all of a population in a process called natural selection (since Darwin). It is vanishingly rare or even impossible that every wild animal in a population takes too little nourishment to survive, so the entire population perishes. In virtually every case, a subset of individuals die and a subset survive. Perhaps the dominant, the skilled, or the lucky access enough resources to survive. Human inclination to step in and decimate animals is simply an intervention by people for people, not a favor to animals or assistance to nature or some such construction. The animals chosen for such mercy killing are usually considered desirable or undesirable by the human killers and the survivors likewise chosen artificially. We might agree this is artificial selection, but it is not conservation of the population being decimated. In sum, the introduction of human value judgments in this field requires careful disentanglement,^[36] lest we delude ourselves into thinking we are helping others as we help ourselves.

So, we return to the idea of killing a few to save many of their fellows. Setting aside the rhetorical ideas of mass murderers, mass starvation, and pandemic disease, there is no **direct** benefit to the population associated with killing one or a few of its members. Therefore the direct causal mechanism of kill to conserve has been decapitated. One has to consider an indirect effect instead.

The fundamental assumption that one should kill the few to conserve the many requires that a proponent identify the **indirect** benefit to its surviving fellows. When we consider indirect mechanisms in conservation over the decades, we see regrowth of three different ideas about indirect causes.

One relatively new idea is 'hunter self-restraint'. This idea mutated out of the widely acknowledged 19th and 20th century rise of regulation of commercial hunting and the rise of the sportsmen and gentlemen hunters, among whom President Teddy Roosevelt is often cited. ^[141, 142] As commercial hunting in the United States and Canada was gradually driving edible wildlife extinct, the hunters who agreed to restrain themselves and police and regulate those who did not, are credited with preventing over-kill. In this formulation of kill to conserve, the elite white males generally could kill so as to conserve. Law enforcement would not get credit for saving wildlife populations from overkill, but rather the credit belongs with hunters who showed restraint. We have previously addressed doubts about this logic, ^[143] which we can summarize by the same analogies used above. It is folly to credit the restraint of a mass murderer or typhoid Mary, when the credit belongs with law enforcement and public health officials respectively. Certainly, celebrate law-abiding hunters. But celebrate more effective laws. Over-killing is prevented by stopping killing animals, not by the act of killing animals. We examine the indirect mechanism further below.

The second re-sprouted hydra head is that animal killers contribute money or data to conservation (hunting for conservation). This is a proper indirect causal connection between killing a few to conserve the many. But is it enough? We examine the indirect mechanism further below.

The third new idea is that without being legally permitted to kill animals, some people will kill many more illegally (blood buys goodwill). We examine the indirect mechanism further below.

These indirect mechanisms require evidence about human attitudes, and behavior in addition to measures of animal survival and population persistence. Indirect mechanisms need careful scientific evaluation, just as medicines do not reach the market based on correlation or epidemiological evidence alone.

2. Hunter Self-restraint

North American and European governments managed to prevent extinction of numerous wildlife populations (bison, white-tailed deer, Canada goose, and other popular so-called 'game' species that people generally eat) by reducing commercial and unregulated killing by people among other protections. We believe the latter fact is undisputed. Might not controls on over-kill like those for game animals be effective in protecting non-game?

Because the survivors of hunts sometimes live long enough to reproduce and the longer-term reproduction may lead to the recovery of their populations, some observers have credited the hunters' self-restraint that leaves survivors, rather than crediting the restraints imposed by rules and law enforcers;^[143] and disregarding the distinctions between ecologically minded hunters and others.^[144] Therefore, some commentators have promoted the permitted hunting that remains after regulations limited over-kill as the important conservation intervention, rather than the regulatory mechanisms that limited over-kill.^[143]

Yet, frequent calls for reducing non-game, predator populations in the USA and Canada have led to doubts that hunter self-restraint will protect wolves, grizzly bears, cougars, and other large carnivores (which incidentally compete for the game that hunters prefer and sometimes eat domestic animals that most of the public eats). Will hunters restrain themselves from killing predators to leave survivors that might prevent local extinctions? Are government regulatory mechanisms enforced? And if enforced, are they sufficient to conserve carnivore populations? These questions persist because humans kill most large carnivores worldwide^[145] and unregulated killing is the major source of death for wolves and grizzlies in the USA.^[26, 130, 146, 147] Therefore, hunter self-restraint is not obvious outside the writings of Roosevelt and his gentlemanly ilk.^[141] Also U.S. government policies for carnivores have repeatedly been questioned on the grounds of sustainability.^[23, 97, 148-150] So we are left wondering if hunters' own self-restraint is sufficient to prevent over-kill so it can be credited — in the absence of laws and their enforcement — with conservation even of non-game species?

3. Hunting for Conservation?

Another common assertion about indirect interventions by hunters is the belief that money and information contributed by hunting as an industry has been essential to government agencies charged by law with conserving native species. The idea is that money and data have helped protect the animals that survived hunts or their essential habitats, which has been reviewed critically for evidence.^[144, 151] The mere fact that some game species have enjoyed recoveries does not prove that hunting fees or data helped protect the survivors. The issue of scientific information was studied by way of a survey of 667 North American management plans for hunted species.^[100, 101] These authors revealed that an uncertain number of hunters left an unknown number of surviving animals with unknown effects on their populations, in a large majority of those plans. One may find a counter-example perhaps, e.g.,^[152] but that does not outweigh the vast majority of 667 plans that lacked evidence that hunting data contributed to management plans and without information about population abundance, hunter take, survival, it is unclear how such plans advance conservation.^[100, 101] Closely related and perhaps more persistent is the suggestion that money paid directly by hunters went directly to conservation.^[153] Believers will go to great lengths to defend the claim, such as compiling lists of signatories and rebutting dozens of scientific and ethical challenges,^[154, 155] or presenting hunting as central to legal doctrines or 'models' of wildlife conservation.^[156, 157] The debate over sport or trophy hunting for conservation has raged on despite years of systematic, scientific reviews lamenting the shortages of data^[151, 158-162] and the hunting for conservation idea has also sustained legal and social scientific challenges.^[163-166]

4. Blood Buys Goodwill?

The second idea is that the government must allow some killing or the frustrated would-be killers will react angrily or retaliate systematically to commit over-kill. This idea itself sprouted two new notions. 'Blood buys goodwill' and 'tolerance killing' have attracted scientific attention because proponents assume that organizational or governmental policies can influence the rate of such killing to avoid over-kill. ^[140, 167-170] For example, some decision-makers hypothesize that one can change the benefit-cost valuation of an animal by changing the status of wildlife to a game species (tolerance killing) or by permitting some legal killing so would-be unregulated killers desist (blood buys goodwill).

The strongest inference about whether policies that liberalize (legalize or expand) killing of animals would buy goodwill or foster tolerance for conservation, would derive from a randomized, controlled experiment testing the effect of a treatment that liberalized killing for some jurisdictions and not others. This is called the gold standard in biomedical and other fields. The next best standard, which we have called silver standard, ^[112] would analyze before-and-after comparison of intervention (BACI without randomization). Statisticians have explained the resulting weakening of inference compared to the gold standard. ^[171-173] Using the silver standard, data from wolves have been used repeatedly to test these hypotheses ever since the U.S. Fish & Wildlife Service (USFWS) argued unsuccessfully in federal court in 2006 that blood buys goodwill and killing for tolerance would help recover endangered gray wolves ^[168] and have resumed claiming this in 2020

(http://faculty.nelson.wisc.edu/treves/archive_BAS/Treves%20letter%20Frazer%20USFWS%20Sklar%20CA%20FG%20Commission.pdf, which example I return to later. Five wolf populations have been studied to test tolerance killing and blood buys goodwill (gray wolves in Finland, Scandinavia, and the upper Midwest US, Mexican wolves in the southwest US, and red wolves in North Carolina, US).

5. Research On Wolves To Test Tolerance Killing And Blood Buys Goodwill

Although the motives of wolf-killers are not well understood, ^[174] attitudes toward wolves are well-studied generally, ^[175] and intentions to kill predators illegally have been measured many times. ^[27, 176-179] Unregulated and often illegal wolf-killing is the major cause of death in every U.S. wolf population studied [26], with similar patterns in Europe. ^[140, 180, 181] The predominant hypotheses for the motivation to kill wolves illegally is competition for wild or domestic ungulates, resistance to government, or identity group politics (peer group pressures) treating the wolf as a symbol of political rivalries. ^[174, 182-184] In 2014, we presented a perspective on the state of knowledge about tolerance for predators [178]; namely that economic benefit - cost perceptions of people was only one factor, and not necessarily the strongest, shaping people's willingness to coexist peacefully with predators such as jaguars, wolves, and bears, e.g., ^[177] and that other factors such as government policies, peer group pressures, and instinctive emotional responses might play even stronger roles in tolerance and intentions to kill predators. ^[178]

Since 2015 and the last review,^[178] many independent teams of investigators have generated three parallel data streams on human attitudes, on hazard and incidence rates of individual wolves, and on dynamics of populations of wolves in relation to policy changes that liberalized wolf-killing. If the tolerance killing or blood buys goodwill notions have merit, these silver-standard tests using data on humans and data on wolves should reveal their merit.

The idea that tolerance will change if wolves are managed lethally predicts that human attitudes are associated with changing policies for legalizing or prohibiting legal wolf-killing. Since our 2014 review of tolerance for predatory wildlife mentioned above, two studies with silver-standard designs have been published. The first study led by Dr. Christine Browne-Nuñez used focus groups with mixed qualitative and quantitative methods to show that relaxing U.S. Endangered Species Act (ESA) protections for gray wolves in Wisconsin led to calls for yet more wolf-killing and no apparent reduction in inclinations to kill wolves illegally.^[174] The second led by Jamie Hogberg used a mail-back survey to a panel of Wisconsin residents who had been sampled three times previously since 2001.^[47] She showed that average tolerance for wolves declined after the first Wisconsin regulated public hunting, trapping, and hounding season in 2012, but only significantly so among older males who had experience with hunting and lived in wolf range (different from Ojibwe tribal members who were male, living in wolf range and familiar with hunting).^[49]

Hogberg's result emerged from asking the same respondents the same questions at two time points between which ESA protections had been lifted, and wolf-killing had been liberalized to include both government agents killing problem wolves and public hunting and trapping, i.e., longitudinal measures of the same individuals over time.^[47] When she partitioned the data by those who had approved of wolf-hunting in 2009, their tolerance showed the most significant decrease in objective measures (i.e., not asking them about their tolerance but asking them about attitudes and actions previously associated with tolerance).^[47] Therefore, she concluded that tolerance hunting was unlikely. Some have argued from cross-sectional data and self-reported recollections of their tolerance, that policies to liberalize wolf-killing did lead to greater tolerance for wolves. One study claimed erroneously that self-reports showed people were more tolerant of wolves after Montana implemented wolf-hunting but the study actually showed that respondents reported more favorable views of the government policy not of wolves.^[185] More sophisticated studies have instead reported on cross-sectional measures of attitudes to corroborate tolerance killing;^[167, 186, 187] also see similar claims for bears^[188] and opposing views.^[189] However, a longitudinal study and within-subjects analysis is needed to measure change in attitudes as the hypothesis requires, whereas sampling two different populations at two time points leaves another potentially confounding variable in place (in addition to time passing), if one unintentionally samples slightly different demographic groups. Two such cross-sectional studies showed that tolerance for wolves and approval for the ESA have increased or stayed stable over many years in the USA^[190] and disapproval of lethal management has risen.^[191] But such studies do not reveal if policies affected the responses.

Hogberg et al. also compared self-reported tolerance before liberalized wolf-killing, using this question 'My tolerance for wolves would increase if people could hunt them' (2009) to a similar self-report after

the policy change in 2012, ‘My tolerance for wolves has increased since people can hunt them’^[47] and concluded as follows,

“In 2013, some wolf range residents self-reported an increase in their tolerance since people have been allowed to hunt wolves (36%). These self-reports were inconsistent with the trend of declining tolerance that we measured, and show disagreement between self-reports of tolerance versus our multi-item construct of tolerance. Self-reports of tolerance that conflict with measurements of tolerance emphasize the need for longitudinal measures over cross-sectional measures, especially if different questionnaire items are compared across studies. Moreover, the majority of respondents did not report their tolerance had increased or changed since the wolf hunt. We cannot discern whether respondents were unaware of the changes we detected in their own prior responses, or if our self-report question measured something other than change in tolerance.” (at p. 7)/

Although Hogberg’s results like most surveys are correlational not causal, the before-and-after comparison renders them stronger than one-time surveys correlated to respondent demographics or self-reports. Regardless, the results do not support the tolerance hunting hypothesis, at least for the demographic group thought most likely to respond positively.^[47]

We are not aware of social scientific evidence supporting the idea that the average of individual attitudes to predators changed to become more positive after killing was liberalized. We only know of evidence to the contrary that liberalizing wolf-killing led to calls for more killing and lower tolerance for wolves.^[21, 47, 174] Because shifting social norms (in this case relaxing protections for wolves) and social facilitation are very powerful factors in pro- and anti-environmental behaviors,^[192, 193] understanding both killing for conservation and illegal killing in opposition to conservation can benefit from tests and applications of criminological theory and social psychological theory.^[194-196] These fields teach us to investigate the motivations of would-be wolf-killers and the opportunities they take.^[27, 184, 197, 198] These insights lead us to consider next the behaviors of wolf-killers and also test whether blood buys goodwill.

Since 2015, a series of studies using the silver standard examined the effect of policy changes on individual wolf fates and the effect on the dynamics of several wolf populations, to test the main element of the blood buys goodwill hypothesis. That element was the claim that illegal wolf-killing would decrease if the government liberalized wolf-killing.

We begin in reverse chronological order because Dr. Francisco Santiago-Ávila’s dissertation^[30] resolved a scientific debate stoked by incomplete information. Prior studies estimated the hazards and incidences of different endpoints (death or disappearance) among radio-collared gray wolves in Wisconsin from 1980-2012 and radio-collared Mexican wolves in Arizona and New Mexico, USA from 1998–2016 respectively. Both studies examined hazards and incidents in relation to repeated changes in policy from strict protection to liberalized wolf-killing and back again. Both conducted time-to-event analyses that examined the events experienced by radio-collared wolves as policies liberalizing wolf-killing, or court-ordered reversals of those policies, changed 12 times in Wisconsin and four times in Mexican wolf

range. They showed that incidence of reported illegal-killing was one-fifth and one-third the incidence of disappearances,^{[31][113]} which were most plausibly dominated by cryptic poaching, a term coined for illegal killing followed by destruction of evidence. Cryptic poaching provides insight into the motivations behind illegal wolf-killing, so cryptic poaching and disappearances require further discussion.

Disappearances are likely dominated by cryptic poaching because the time to disappearance was significantly briefer than for time to other causes of death, especially natural causes of death, hence battery failure is an extremely unlikely explanation for the vast majority of gray Mexican, and red wolf disappearances.^[31, 113, 180, 199] Also, the disappearances rose significantly during periods of liberalized wolf-killing, without any change in rates of vehicle collisions which one might expect if long-distance migration explained the disappearances.^[31, 113] Other studies corroborate that inference^[180, 199] as does independent evidence of wolf migration between Michigan and Wisconsin.^[25] Finally, disappearances rose during winter in Wisconsin independent of policy period and the seasonal effect most likely relates to snow cover making wolf tracks easier to follow and perhaps reducing the risk posed by law enforcement officials because people rarely use wolf habitats in winter in this temperate region.^[31] Cryptic poaching betrays a concern with law enforcement that bears on our topic.

The motivation to conceal evidence and destroy or tamper with radio-collars suggests wolf-killers were more concerned with law enforcement during periods of liberalized wolf-killing than other periods. That refines our understanding beyond an early hypothesis that stated, “When the government kills a protected species, the perceived value of each individual of that species may decline. Liberalizing wolf culling may have sent a negative message about the value of wolves or that poaching prohibitions would not be enforced.”^[107] We can now discount the latter possibility from the two recent studies.^[31, 113] Indeed, one suggests the government sharing of radio-frequencies for the collars on the endangered Mexican wolves encouraged cryptic poaching, perhaps to protect the owners of the land where the wolves were killed or the recipients of the radio-frequencies. It is the disappearances of marked animals in the USA and in Scandinavia, as cited above, that cast the most doubt on the notion that blood buys goodwill. Because cryptic poaching spiked significantly during periods of liberalized killing, it appears that blood beget more blood.

Next we address the putative counter-evidence. Analyses that fail to take into account the exposure time of marked animals or ignore disappearances of marked animals as in cryptic poaching, enfold systematic, biasing error that makes their estimates substantially inaccurate.^[200] That systematic bias is substantially larger than the effect the latter found which has been attributed to a shift from reported poaching to cryptic poaching.^[31] Indeed, one would expect disappearances of marked wolves to exceed reports of illegally killed wolves given the disproportionate number of disappearances in U.S. wolf populations from Alaska to the desert southwest.^[26]

Another revival of blood buys goodwill has been mounted by a Scandinavian team^[201] despite concerns over both statistical and observational methods/^[29] We acknowledge the latter study is recent enough

that the jury is still out on its accuracy and precision, but the straightforward interpretation of their Figures suggests that disappearances of Scandinavian wolves rose sharply after periodic wolf-hunts began. Also, our concerns over their model specifications have not been addressed to our satisfaction.^[29]

In sum, the silver-standard analyses of individual wolf survival over periods of changing policies on wolf-killing do not support blood buys goodwill, and also seem to resolve years of scientific controversy over studies of population dynamics of gray wolves, which suffered from incomplete information or methods as we explain next.

Unlike the survival analyses on individual wolves above, analyses of population dynamics are particularly prone to unsupported assumptions and confounding variables.^[36, 202, 203] Although the idea that blood buys goodwill was first tested by analyzing Wisconsin's and Michigan's wolf population dynamics, it proved impossible to reject a potential confounding effect of density-dependence and a potential confounding effect of poorly documented methods for wolf census. Each slow-down in population growth seemed to coincide with a policy change that liberalized wolf-killing or a change in census methods.^[28, 36] The importance of the poorly documented changes in census methods relates to uncertainty about the accuracy and precision of census methods overlooked by prior authors^[133, 134] but reported in other articles.^[28, 36]

For Wisconsin's wolves, Santiago-Ávila showed that hazard of reported, illegal wolf-killing (not disappearances) was not associated with the policy periods with liberalized wolf-killing, but was significantly associated with changes in wolf census methods.^[31] The census period with the lowest rate of wolves reported killed illegally was 1996-2000, a period without liberalized wolf-killing, when for the first time, large numbers of civilian volunteers were engaged by the state government to track wolves for winter censuses, usually without a state biologist accompanying and typically without radio-telemetry.^[28, 36] That suggests civilian wolf-trackers over five winters deterred reports of illegal wolf-killing without changing cryptic poaching. Therefore, we infer that there were two categories of illegal wolf-killing in Wisconsin 1980-2012. The first category rarely tried to destroy evidence and was deterred by the civilian trackers (at least initially), so illegal killing that left evidence and a functioning transmitter decreased in those years.; the second category was not deterred by the presence of civilian wolf-trackers engaged by the state. One might go further and hypothesize that the second category was using specialized skills. The skills and organization needed by the second category — to destroy a radio-collar, decapitate a wolf to remove a collar (usually in winter), or to illegally transport a wolf carcass with a transmitting collar to a safe location — were performed while civilian volunteers engaged by the state were conducting frequent surveys.^[204] These do not seem to be commonplace skills or organizations. Therefore, blood might not buy goodwill in general or specifically for the second category of wolf-killers. We see yet another hydra head preparing to grow in the kill to conserve corpus. Proponents might argue that one should liberalize wolf-killing to appease the second category of wolf-killer that destroys evidence and seems undeterred by wolf-census-takers in the field. An intuitive alternative would be to prosecute the latter rather than appease them.

Because of the muddled history of census methods, it is difficult to be confident that population dynamics among the Michigan and Wisconsin wolves were altered by the policy or by negative, density-dependence slowing reproduction, which strongly slows birth rates or increases mortality rates as a population nears carrying capacity. Although there is legitimate uncertainty about density-dependence in Wisconsin's wolf population history^[107-110, 114, 115] Mexican wolf data have recently corroborated the finding that liberalizing wolf-killing slowed population growth independent of the number of wolves killed legally and independent of potential negative density-dependence.

The endangered Mexican wolf population declined 23% during the first periods of liberalized wolf-killing (2003-2009) and then experienced a period of decline or virtually no growth during the second period (2014: 112 wolves dropped by 12.5% and then grew an average of 10% annually to recover to 118 wolves by 2017), and these precipitous drops and slow regrowths occurred despite no change in the hazard or incidence of agency removals (lethal or relocation to captivity), which suggests a new source of mortality had been added.^[113]

In sum, the hydra's new heads or ideas that 'blood buys goodwill' or 'tolerance killing' are not supported by the weight of evidence at present in any wolf population studied. However, we already see new justifications for killing for conservation sprouting as 'poaching is conservation'^[184, 197] or 'blood appeases dedicated wolf-killers' alluded to above. We are also concerned that government agencies cling to the rejected notions despite evidence and despite governing laws that require use of the best available science. To wit, the USFWS claimed they should kill to conserve in federal court in 2006 and repeated the claim in 2020.

6. Conclusion

A paradigm in science is a worldview that shapes the questions researchers ask and the methods they use. Paradigms in science can be powerful and useful but they can also slow progress, even tragically so/^[214-216] Their resilience to disproof is a hallmark of paradigms. The convictions of the holders of the paradigm are very hard to dislodge because of non-scientific reasons to do with personal investments and relationships tied to the paradigm. Paradigms are notoriously hard to shift, as seen with the millennia-old persistence of 'balance in nature' despite being resoundingly disproven since Darwin. Historians of science have concluded that either generational change of scientists is needed to dislodge such enduring myths or an absolutely incontrovertible test of the hypothesis must be published, replicated, and withstand the inevitable and important scientific debate about its validity. We believe the hydra of kill to conserve is near that threshold.

Appendix 4 — Killing Wolves Does Not Protect Livestock

Lethal methods of predator control have proven less effective than non-lethal methods. Lethal methods have been subject to less rigorous experimental tests than have non-lethal methods. Lethal methods have a higher risk of undesirable counterproductive effects of raising risk for livestock.

The above three statements are substantiated by the following ten systematic reviews by two dozen scientists from a dozen countries. ^[112, 217-225]

Appendix 5 — Collected References Cited

All publications cited in this comment and its appendices, except for books, are either available at the embedded links, or have been gathered here:

http://faculty.nelson.wisc.edu/treves/archive_BAS/Public_comment_2021.zip. For access to the cited books, or if you have trouble accessing other cited publications, please contact atreves@wisc.edu.

1. Oxford English Dictionary. 2021 18 January 2021; Available from: <https://www.oed.com/>.
2. Department of the Interior and Department of Commerce, Revised Interagency Cooperative Policy Regarding the Role of State Agencies in Endangered Species Act Activities. Federal Register, 2016. 81: p. 8663-8665.
3. Treves, A., F.J. Santiago-Ávila, and K. Putrevu, Quantifying the effects of delisting wolves after the first state began lethal management. in review 2021.
4. Thiel, R.P., W. Hall, E. Heilhecker, and A.P. Wydeven, A Disjunct Gray Wolf Population in Central Wisconsin, in Recovery of Gray Wolves in the Great Lakes Region of the United States: an Endangered Species Success Story, A.P. Wydeven, T.R. Van Deelen, and E.J. Heske, Editors. 2009, Springer: New York. p. 107-118.
5. Palacios, V., E. Font, E.J. García, L. Svensson, L. Llana, J. Frank, and J.V. López-Bao, Reliability of human estimates of the presence of pups and the number of wolves vocalizing in chorus howls: implications for decision-making processes. European Journal of Wildlife Research, 2017. 63: p. 59-66.
6. Pyare, S. and J. Berger, Beyond demography and delisting: ecological recovery for Yellowstone's grizzly bears and wolves Biological Conservation 2003. 113: p. 63-73.
7. Callan, R., N.P. Nibbelink, T.P. Rooney, J.E. Wiedenhoef, and A. Wydeven, Recolonizing wolves trigger a trophic cascade in Wisconsin (USA). Journal of Ecology, 2013: p. <https://doi.org/10.1111/1365-2745.12095>.
<https://doi.org/10.1111/1365-2745.12095>.
8. Creel, S. and J.J. Rotella, Meta-analysis of relationships between human offtake, total mortality and population dynamics of gray wolves (*Canis lupus*). PLoS ONE, 2010. 5(9): p. 1-7.
9. Mladenoff, D.J., R.G. Haight, T.A. Sickley, and A.P. Wydeven, Causes and implications of species restoration in altered ecosystems. BioScience, 1997. 47: p. 21-31.
10. Mladenoff, D.J., M.K. Clayton, S.D. Pratt, T.A. Sickley, and A.P. Wydeven, Change in occupied wolf habitat in the Northern Great Lakes Region, in Recovery of Gray Wolves in the Great Lakes Region of the United States: an Endangered Species Success Story, A.P. Wydeven, T.R. Van Deelen, and E.J. Heske, Editors. 2009, Springer: New York. p. 119-138.
11. Brainerd, S.M., Henrik Andrén, Edward E. Bangs, Elizabeth H. Bradley, Joseph A. Fontaine, Wayne Hall, Yorgos Iliopoulos, Michael D. Jimenez, Elizabeth A. Jozwiak, Olof Liberg, Curt M. Mack, Thomas J. Meier, Carter C. Niemeyer, Hans C. Pedersen,

- Håkan Sand, Ronald N. Schultz, Douglas W. Smith, Petter Wabakken, and A.P. Wydeven, The effects of breeder loss on wolves. *Journal of Wildlife Management*, 2008. 72(1): p. 89-98.
12. Harrington, F.H., M. LD, and S.H. Fritts, Pack size and wolf pup survival: their relationship under varying ecological conditions. *Behavioral Ecology and Sociobiology*, 1982. 13: p. 19-26.
 13. Mech, L.D., Alpha status, dominance, and division of labor in wolf packs *Canadian Journal of Zoology*, 1999. 77: p. 1196-1203.
 14. Schmidt, P.A. and D.L. Mech, Wolf pack size and food acquisition. *American Naturalist*, 1997. 150(4): p. 513-517.
 15. Wydeven, A.P., A. Treves, B. Brost, and J.E. Wiedenhoef, Characteristics of wolf packs in Wisconsin: Identification of traits influencing depredation, in *People and Predators: From Conflict to Coexistence*, N. Fascione, A. Delach, and M.E. Smith, Editors. 2004, Island Press: Washington, D. C. p. 28-50.
 16. Santiago-Avila, F.J., A.M. Cornman, and A. Treves, Killing wolves to prevent predation on livestock may protect one farm but harm neighbors. *PLoS ONE*, 2018. 13(1): p. e0189729 10.1371/journal.pone.0189729.
 17. Fritts, S.H., W. J. Paul, and L.D. Mech, Can relocated wolves survive? *Wildlife Society Bulletin*, 1985. 13: p. 459-463.
 18. Natural Resources Board, 15 February 2021 Special Meeting, N.R. Board, Editor. 2021. p. 37 min, transcript and video available from authors.
<https://dnrmedia.wi.gov/main/Play/ccb5cf0361c5471e9cbc7c7a898cfc741d?catalog=9da0bb432fd448a69d86756192a62f1721>.
 19. Manfredo, M.J., T.L. Teel, A.W. Don Carlos, L. Sullivan, A.D. Bright, A.M. Dietsch, J. Bruskotter, and D. Fulton, The changing sociocultural context of wildlife conservation. *Conservation Biology*, 2020. 10.1111/cobi.13493.
<https://www.ncbi.nlm.nih.gov/pubmed/32128885>.
 20. Treves, A. and K.A. Martin, Hunters as stewards of wolves in Wisconsin and the Northern Rocky Mountains, USA. *Society and Natural Resources*, 2011. 24(9): p. 984-994.
 21. Treves, A., L. Naughton-Treves, and V.S. Shelley, Longitudinal analysis of attitudes toward wolves. *Conservation Biology*, 2013. 27: p. 315–323.
 22. Treves, A., R.L. Jurewicz, L. Naughton-Treves, and D. Wilcove, The price of tolerance: Wolf damage payments after recovery. *Biodiversity and Conservation*, 2009. 18: p. 4003–4021.
 23. Treves, A., G. Chapron, J.V. López-Bao, C. Shoemaker, A. Goeckner, and J.T. Bruskotter, Predators and the public trust. *Biological Reviews*, 2017. 92: p. 248-270.
 24. Treves, A., B.J. Bergstrom, D. Parsons, P.C. Paquet, and R.P. Thiel, Letter to the USFWS describing concerns about use of the best available science in the State of Wisconsin's post-delisting monitoring report on gray wolves. 2014:
<http://faculty.nelson.wisc.edu/treves/>.
 25. Treves, A., J.A. Langenberg, J.V. López-Bao, and M.F. Rabenhorst, Gray wolf mortality patterns in Wisconsin from 1979 to 2012. *Journal of Mammalogy*, 2017. 98(1): p. 17-32. DOI:10.1093/jmammal/gyw145.

26. Treves, A., K.A. Artelle, C.T. Darimont, and D.R. Parsons, Mismeasured mortality: correcting estimates of wolf poaching in the United States. *Journal of Mammalogy*, 2017. 98(5): p. 1256–1264. I:10.1093/jmammal/gyx052
<https://doi.org/10.1093/jmammal/gyx052>.
27. Treves, A., C. Browne-Nunez, J. Hogberg, J. Karlsson Frank, L. Naughton-Treves, N. Rust, and Z. Voyles, Estimating poaching opportunity and potential, in *Conservation Criminology*, M.L. Gore, Editor. 2017, John Wiley & Sons: New York. p. 197-212.
28. Treves, A., Peer review of the proposed rule and draft biological report for nationwide wolf delisting, U.S.F.W.S. Department of Interior, Editor. 2019, Department of Interior, U.S. Fish & Wildlife Service: Washington, D.C.
https://www.fws.gov/endangered/esa-library/pdf/Final%20Gray%20Wolf%20Peer%20Review%20Summary%20Report_053119.pdf.
29. Treves, A., N.X. Louchouart, and F. Santiago-Ávila, Modelling concerns confound evaluations of legal wolf-killing. *Biological Conservation*, 2020.
<https://doi.org/10.1016/j.biocon.2020.108643>: p. 108643. 10.1016/j.biocon.2020.108643.
<https://doi.org/10.1016/j.biocon.2020.108643>.
30. Santiago-Ávila, F.J., Survival rates and disappearances of radio-collared wolves in Wisconsin, in *Nelson Institute for Environmental Studies*. 2019, University of Wisconsin-Madison.
31. Santiago-Ávila, F.J., R.J. Chappell, and A. Treves, Liberalizing the killing of endangered wolves was associated with more disappearances of collared individuals in Wisconsin, USA. *Scientific Reports*, 2020. 10: p. 13881. /10.1038. |
<https://doi.org/10.1038/s41598-020-70837-x>.
32. Stark, D. and J. Erb, 2012 Minnesota wolf season report. 2013, Minnesota Department of Natural Resources: Grand Rapids, MN.
http://files.dnr.state.mn.us/fish_wildlife/wildlife/wolves/2013/wolfseasoninfo_2012.pdf.
33. Treves, A., K.A. Artelle, C.T. Darimont, W.S. Lynn, P.C. Paquet, F.J. Santiago-Avila, R. Shaw, and M.C. Wood, Intergenerational equity can help to prevent climate change and extinction. *Nature Ecology & Evolution*, 2018. 2: p. 204-207.
<https://doi.org/10.1038/s41559-018-0465-y>.
34. Treves, A., F. Santiago-Ávila, and W.S. Lynn, Just Preservation. *Biological Conservation*, 2018. 229: p. 134-141. 10.1016/j.biocon.2018.11.018.
<https://www.sciencedirect.com/science/article/pii/S0006320718310139?via%3Dihub>.
35. 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.
36. 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.
37. Santiago-Avila, F.J., W.S. Lynn, and A. Treves, Inappropriate consideration of animal interests in predator management: Towards a comprehensive moral code, in

Large Carnivore Conservation and Management: Human Dimensions and Governance, T. Hovardos, Editor. 2018, Taylor & Francis: New York. p. 227-251.

38. Santiago-Ávila, F.J., A. Treves, and W.S.e.c.-a. Lynn, Just preservation, trusteeship and multispecies justice. *Animal Sentience: Response to Commentary on Treves et al. on Just Preservation*, 2020. 27(27): p. 393-409. 10.51291/2377-7478.1665. <https://www.wellbeingintlstudiesrepository.org/cgi/viewcontent.cgi?article=1665&context=animsent>.

39. López-Bao, J.V., J.C. Blanco, A. Rodríguez, R. Godinho, V. Sazatornil, F. Alvares, E.J. Garcia, L. Llana, M. Rico, Y. Cortés, V. Palacios, and G. Chapron, Toothless wildlife protection laws. *Biodiversity and Conservation*, 2015. 24(8): p. 2105-2108.

40. López-Bao, J.V., G. Chapron, and A. Treves, The Achilles heel of participatory conservation. *Biological Conservation*, 2017. 212: p. 139–143.

41. Wood, M.C., Advancing the sovereign trust of government to safeguard the environment for present and future generations (Part I): Ecological realism and the need for a paradigm shift. *Environmental Law*, 2009. 43: p. 44-88.

42. Wood, M.C., *Nature's Trust*. 2013, New York: Cambridge University Press.

43. Wood, M.C., Tribal trustees in climate crisis *American Indian Law Journal*, 2014. 2(2): p. 518-546.

44. Nie, M., *State Wildlife Policy and Management: The Scope and Bias of Political Conflict*. *Public Administration Review*, 2004. 64(2): p. 221-233.

45. Nie, M., C. Barns, J. Haber, J. Joly, K. Pitt, and S. Zellmer, Fish and wildlife management on federal lands: Debunking state supremacy. *Environmental Law*, 2017. 47: p. 797-932.

46. Nie, M., N. Landers, and M. Bryan, The Public Trust in Wildlife: Closing the Implementation Gap in 13 Western States. *Environmental Law Reporter*, 2020. 50: p. 10909-10919.

47. Hogberg, J., A. Treves, B. Shaw, and L. Naughton-Treves, Changes in attitudes toward wolves before and after an inaugural public hunting and trapping season: early evidence from Wisconsin's wolf range. *Environmental Conservation*, 2015. 43(1): p. 45-55.

48. Sanders, J.D., Wolves, lone and pack: Ojibwe treaty rights and the Wisconsin wolf hunt. *Wisconsin Law Review*, 2013. 2013: p. 1263-1294.

49. Shelley, V.S., A. Treves, and L. Naughton-Treves, Attitudes to wolves and wolf policy among Ojibwe Tribal members and non-tribal residents of Wisconsin's wolf range. *Human Dimensions of Wildlife*, 2011. 16: p. 397–413.

50. Allison, D.B., A.W. Brown, B.J. George, and K.A. Kaiser, Reproducibility: A tragedy of errors. *Nature*, 2016. 530: p. 27-29. doi:10.1038/530027a. https://www-nature-com.ezproxy.library.wisc.edu/news/polopoly_fs/1.19264!/menu/main/topColumns/topLeftColumn/pdf/530027a.pdf.

51. Attfield, R., Environmental ethics and intergenerational equity. *Inquiry*, 1998. 41: p. 207-222.

52. Baker, M. and K. Brandon, 1,500 scientists lift the lid on reproducibility. *Nature*, 2016. 533: p. 452-454.

53. Beauchamp, T.L. and J.F. Childress, Principles of biomedical ethics. 2013, New York: Oxford University Press.
54. Biden, J.R., Memorandum on Restoring Trust in Government Through Scientific Integrity and Evidence-Based Policymaking P.E. Order, Editor. 2021, The White House: Washington, D.C.
<https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/memorandum-on-restoring-trust-in-government-through-scientific-integrity-and-evidence-based-policy-making/>
55. Bouyer, J., N.H. Carter, C. Batavia, and M.P. Nelson, The Ethics of Eliminating Harmful Species: The Case of the Tsetse Fly. *Bioscience*, 2019. 69(2): p. 125-135. 10.1093/biosci/biy155. <https://www.ncbi.nlm.nih.gov/pubmed/30792543>.
56. Callicott, J.B., Conservation Values and Ethics, in Principles of Conservation Biology, G.K. Meffe and C.R. Carroll, Editors. 1997, Sinauer Associates: Sunderland, MA p. 29-55.
57. Carroll, C., D.J. Rohlf, B.R. Noon, and J.M. Reed, Scientific Integrity in Recovery Planning and Risk Assessment: Comment on Wilhere. *Conservation Biology*, 2012. 26(743-745).
58. Carroll, C., B. Hartl, G.T. Goldman, D.J. Rohlf, A. Treves, J.T. Kerr, E.G. Ritchie, R.T. Kingsford, K.E. Gibbs, M. Maron, and J.E.M. Watson, Defending scientific integrity in conservation policy processes: Lessons from Canada, Australia, and the United States. *Conservation Biology*, 2017. 31(5): p. 967–975.
59. Clark, A. and G. Alvino, Building research evidence towards reproducibility of animal research, in PLoS ONE blog. 2018.
<https://everyone.plos.org/2018/08/06/arrive-rct/>.
60. Clark, S.G., Educational Policy and Ethics for Human-Nature (Wildlife) Coexistence: An Inquiry, a Case, and Recommendations. *Journal of Multidisciplinary Research*, 2021. 13(1): p. 000-000.
<http://eds.b.ebscohost.com/eds/detail/detail?vid=0&sid=beea6413-0f39-434d-a65b-cce26c3d8792%40pdc-v-sessmgr02&bdata=JnNpdGU9ZWRzLWxpdmU%3d#db=aqh&AN=149083185>
61. Department of the Interior, O.o.t.D.S., Part 305: Departmental Science Efforts Chapter 3: Integrity of Scientific and Scholarly Activities, D.o.t.I. Office of the Deputy Secretary, Editor. 2014, Department of the Interior Washington, DC. p. 1-17.
62. Dubois, S., N. Fenwick, E.A. Ryan, L. Baker, S.E. Baker, N.J. Beausoleil, S. Carter, B. Cartwright, F. Costa, C. Draper, J. Griffin, A. Grogan, G. Howald, B. Jones, K.E. Littin, A.T. Lombard, D.J. Mellor, D. Ramp, C.A. Schuppli, and D. Fraser, International consensus principles for ethical wildlife control. *Conservation Biology*, 2017. DOI: 10.1111/cobi.12896: p. DOI: 10.1111/cobi.12896.
63. Gadamer, H.-G., *Hermeneutics, Religion, and Ethics*. 1999, New Haven, CT: Yale University Press.
64. Goodman, S., D. Fanelli, and J. Ioannidis, What does research reproducibility mean? *Science Translational Medicine*, 2016. 8(341): p. 341ps12 DOI: 10.1126/scitranslmed.aaf5027.

65. Group, C.W., RePAIR consensus guidelines: Responsibilities of Publishers, Agencies, Institutions, and Researchers in protecting the integrity of the research record. *Research Integrity and Peer Review*, 2018. 3: p. 15. 10.1186/s41073-018-0055-1. <https://researchintegrityjournal.biomedcentral.com/articles/10.1186/s41073-018-0055-1>.
66. Haber, G.C., Biological, conservation, and ethical implications of exploiting and controlling wolves. *Conservation Biology*, 1996. 10: p. 1068-1081.
67. Iqbal, S.A., J.D. Wallach, M.J. Khoury, S.D. Schully, and J.P.A. Ioannidis, Reproducible Research Practices and Transparency across the Biomedical Literature. *PLOS Biology*, 2016. 14(1): p. e1002333. 10.1371/journal.pbio.1002333. <https://doi.org/10.1371/journal.pbio.1002333>.
68. Jonsen, A.R., M. Siegler, and W.J. Winslade, *Clinical ethics: A practical approach to ethical decisions in clinical medicine*. 1997, New York: McGraw Hill.
69. Kassiola, J.J., Can environmental ethics 'solve' environmental problems and save the world? Yes, but first we must recognize the essential normative nature of environmental problems. *Environmental Values*, 2008. 12: p. 489-514.
70. Kretser, A., Delia Murphy, Stefano Bertuzzi, Todd Abraham, David B. Allison, Kathryn J. Boor, Johanna Dwyer, Andrea Grantham, Linda J. Harris, Rachelle Hollander, Chavonda Jacobs-Young, Sarah Rovito, Dorothea Vafiadis, Catherine Woteki, Jessica Wyndham, and R. Yada, *Scientific Integrity Principles and Best Practices: Recommendations from a Scientific Integrity Consortium*. *Science and Engineering Ethics*, 2019: p. 1–29.
71. Lynn, W.S., Animals, ethics and geography, in *Animal geographies: Place, politics, and identity in the nature-culture borderlands*. 1998. p. 280-297.
72. Lynn, W.S., The Quality of Ethics: Moral Causation in the Interdisciplinary Science of Geography, in *Geographies and Moralities: International Perspectives on Justice, Development and Place* T.I.R. Lee and D.M.h. Smit, Editors. 2004, Routledge: London. p. 231-244.
73. Lynn, W.S., Between Science and Ethics: What Science and the Scientific Method Can and Cannot Contribute to Conservation and Sustainability., in *Gaining Ground: In Pursuit of Ecological Sustainability*, D. Lavigne, Editor. 2006, Limerick, IRL: University of Limerick. p. 191-205.
74. Lynn, W.S. and M. Bekoff, Practical ethics and human-animal relations in *Encyclopedia of human-animal relationships*. 2007. p. 790-797.
75. Lynn, W.S., *Discourse and Wolves: Science, Society and Ethics*. *Society & Animals*, 2010. 18(1): p. 75-92.
76. Lynn, W.S., *Rewilding the Covenant of Life with Compassion: A Future for Global and Sustainability Ethics*. 2018.
77. Lynn, W.S., *Bringing Ethics to Wild Lives: Shaping Public Policy for Barred and Northern Spotted Owls*. *Society & Animals*, 2018. 26: p. 217-238. <http://www.williamlynn.net/pdf/lynn-2018-bringing-ethics-to-wild-lives.pdf>.
78. Mathews, F., From biodiversity-based conservation to an ethic of bio-proportionality. *Biological Conservation*, 2016. 200: p. 140-148.
79. Meffe, G.K. and C.R. Carroll, eds. *Conservation values and ethics*. 1997, Sinauer Associates: Sunderland, MA.

80. Mejlgaard, N., L. Bouter, M., G. Gaskell, P. Kavouras, N. Allum, A. Bendtsen, C. Charitidis, A., N. Claesen, K. Dierickx, A. Domaradzka, A. Elizondo, R., N. Foeger, M. Hiney, W. Kaltenbrunner, K. Labib, A. Marušić, M. Sørensen, P., T. Ravn, R. Ščepanović, J. Tjindik, K., and G. Veltri, A., Research integrity: nine ways to move from talk to walk. *Nature*, 2020. 586: p. 358-360. 10.1038/d41586-020-02847-8.
81. Munafò, M.R., B.A. Nosek, D.V.M. Bishop, K.S. Button, C.D. Chambers, N. Percie du Sert, U. Simonsohn, E.-J. Wagenmakers, J.J. Ware, and J.P.A. Ioannidis, A manifesto for reproducible science. *Nature Human Behaviour*, 2017. 1(0021): p. 1-9. 10.1038/s41562-016-0021 |.
82. NAS, N.A.S.E.M., *Fostering Integrity in Research*. 2017, The National Academies Press: Washington, DC. <https://doi.org/10.17226/21896>.
83. Norton, B.G., *Environmental Ethics and Weak Anthropocentrism*. *Environmental Ethics*, 1984. 6(2): p. 131-148.
84. Open Science Collaboration, *Reproducibility Project: Psychology*. OSF, 2015. 10.17605/OSF.IO/EZCUJ. <https://osf.io/ezcuji/>.
85. Partridge, E., ed. *Responsibilities to Future Generations: Environmental Ethics*. 1981, Buffalo: Prometheus.
86. Patz, J.A., H.K. Gibbs, J.A. Foley, J.V. Rogers, and K.R. Smith, Climate change and global health: quantifying a growing ethical crisis. *EcoHealth*, 2007. 4: p. 397–405.
87. Peterson, A.L., *Being Animal: Beasts and Boundaries in Nature Ethics*. 2013, New York, NY: Columbia University Press.
88. Plumwood, V., *Ecological Ethics From Rights to Recognition: Multiple Spheres of Justice for Humans, Animals and Nature*, in *Global Ethics and the Environment*, N. Low, Editor. 2000, Routledge: New York. p. 188-212.
89. Santiago-Avila, F.J. and W.S. Lynn, Bridging compassion and justice in conservation ethics. *Biological Conservation*, 2020. 248: p. 108648.
90. Singer, P., *Ethics Across the Species Boundary*, in *Global Ethics and the Environment*, N. Low, Editor. 2000, Routledge: New York. p. 146-157.
91. Stone, C.D., *Earth and other ethics: The case for moral pluralism*. 1988, New York: Harper and Row.
92. Treves, A., Scientific ethics and the illusion of naïve objectivity. *Frontiers in Ecology and the Environment*, 2019. 7: p. 361. doi:10.1002/fee.2091.
93. Vucetich, J.A. and M.P. Nelson, Wolf Hunting and the Ethics of Predator Control, in *Political Science, Comparative Politics, Political Theory*. 2014, Oxford Handbooks Online: Oxford, UK. DOI: 10.1093/oxfordhb/9780199927142.013.007.
94. Wiley, *Best Practice Guidelines on Publishing Ethics*. 2020. <https://authorservices.wiley.com/ethics-guidelines/index.html>.
95. Zemanova, M.A., More Training in Animal Ethics Needed for European Biologists. *Bioscience*, 2017. 67: p. 301-305.
96. Treves, A., *Standards of evidence in wild animal research*. 2019, The Brooks Institute for Animal Rights Policy & Law. <http://faculty.nelson.wisc.edu/treves/CCC.php/standards>.
97. Artelle, K.A., J.C. Reynolds, P.C. Paquet, and C.T. Darimont, When Science-Based Management Isn't. *Science*, 2014. 343: p. 1311.

98. Artelle, K.A., J.D. Reynolds, A. Treves, J.C. Walsh, P.C. Paquet, and C.T. Darimont, Working constructively toward an improved North American approach to wildlife management. *Science Advances*, 2015. 4(10): p. eaav2571.
99. Artelle, K.A., S.C. Anderson, J.D. Reynolds, A.B. Cooper, P.C. Paquet, and C.T. Darimont, Ecology of conflict: marine food supply affects human-wildlife interactions on land. *Scientific Reports*, 2016. DOI: 10.1038/srep25936.
100. Artelle, K.A., J.D. Reynolds, T. A., J.C. Walsh, P.P. C., and C.T. Darimont, Hallmarks of science missing from North American wildlife management. *Science Advances* 2018. 4(3): p. eaao0167.
101. Artelle, K.A., J.D. Reynolds, T. A., J.C. Walsh, P.P. C., and C.T. Darimont, Distinguishing science from “fact by assertion” in natural resource management. *Science Advances* (eLetter), 2018. 4(3): p. eaao0167.
102. Artelle, K., J. Stephenson, C. Bragg, J. Housty, W. Housty, M. Kawharu, and N. Turner, Values-led management: the guidance of place-based values in environmental relationships of the past, present, and future. *Ecology and Society*, 2018. 23(3).
103. Darimont, C.T., K.A. Artelle, F. Moola, and P. Paquet, Trophy Hunting: Science on its own can’t dictate policy. *Nature*, 2017. 551: p. 565.
104. Darimont, C.T., P.C. Paquet, A. Treves, K.A. Artelle, and G. Chapron, Political populations of large carnivores. *Conservation Biology*, 2018. 32(3): p. 747–749. 10.1111/cobi.13065.
105. Darimont, C.T., H. Hall, I. Mihalik, K.A. Artelle, L. Eckert, and P. Paquet, Large carnivore hunting and the social license to hunt. *Conservation Biology*, 2021. <https://doi.org/10.1111/cobi.13657>.
106. Treves, A. and C. Batavia, Improved disclosures of non-financial competing interests would promote independent review. *Academia Letters*, 2021. Article 514: p. 1-9.
107. Chapron, G. and A. Treves, Blood does not buy goodwill: allowing culling increases poaching of a large carnivore. *Proceedings of the Royal Society B*, 2016. 283(1830): p. 20152939. <http://dx.doi.org/10.1098/rspb.2015.2939>
108. Chapron, G. and A. Treves, Correction to ‘Blood does not buy goodwill: allowing culling increases poaching of a large carnivore’. *Proceedings of the Royal Society B*, 2016. Volume 283(1845): p. 20162577.
109. Chapron, G. and A. Treves, Reply to comment by Pepin et al. 2017. *Proceedings of the Royal Society B*, 2017. 2016257(1851): p. 20162571. <http://dx.doi.org/10.1098/rspb.2015.2939>
110. Chapron, G. and A. Treves, Reply to comments by Olson et al. 2017 and Stien 2017. *Proceedings of the Royal Society B*, 2017. 284(1867): p. 20171743.
111. Chamberlin, T.C., The method of multiple working hypotheses. *Science*, 1890. 15 (reprinted in 1965, vol. 148): p. 92–96 (reprinted p. 754-759).
112. 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.
113. Louchouart, N.X., F.J. Santiago-Ávila, D.R. Parsons, and A. Treves, Evaluating how lethal management affects poaching of Mexican wolves *Open Science*, 2021. 8 (registered report): p. 200330. <https://doi.org/10.1098/rsos.200330>.

114. Pepin, K., S. Kay, and A. Davis, Comment on: “Blood does not buy goodwill: allowing culling increases poaching of a large carnivore”. Proceedings of the Royal Society B, 2017. 284(1851): p. e20161459.
115. Stien, A., Blood may buy goodwill - no evidence for a positive relationship between legal culling and poaching in Wisconsin. Proceedings of the Royal Society B, 2017. 284: p. 20170267. <http://dx.doi.org/10.1098/rspb.2017.0267>.
116. Olson, E.R., S. Crimmins, D.E. Beyer, D. MacNulty, B. Patterson, B. Rudolph, A. Wydeven, and T.R. Van Deelen, Flawed analysis and unconvincing interpretation: a comment on Chapron and Treves 2016. Proceedings of the Royal Society of London B, 2017. 284(1867): p. 20170273.
117. WDNR, Wisconsin Wolf Management Plan. 1999, Madison, WI: Wisconsin Department of Natural Resources.
118. WDNR, Wisconsin Wolf Management Plan Addendum 2006 and 2007. 2007, Wisconsin Department of Natural Resources: Madison. p. 57. <https://dnr.wi.gov/files/PDF/pubs/ER/ER0099.pdf>.
119. Natural Resources Board, Request that the Board take action to consider approval of a quota for a February 2021 wolf hunt in accordance with the circuit court order issued on February 11, 2021 in Hunter Nation et al. v. WDNR, et al, Civ. No. 2021-CV-31 (Jefferson County). 2021, Department of Natural Resources. : Madison, Wisconsin p. 3. <https://widnr.widen.net/view/pdf/sbdtbr1v2w/2021-02-2A-Special-meeting-wolf-quota.pdf?t.download=true&u=ulxjgn>.
120. WDNR, NRB Wolf Information request: Agenda Item 2A –January 22, 2021 Special Meeting, D.o.N. Resources, Editor. 2021: Madison, WI. <https://widnr.widen.net/s/vh58xn8lfr/2021-01-2a-additional-information>.
121. Wiedenhoeft, J.E., S. Walter, M. Gross, N. Kluge, S. McNamara, G. Stauffer, J. Price-Tack, and R. Johnson, Wisconsin gray wolf monitoring report 15 April 2019 through 14 April 2020, B.O.W. MANAGEMENT, Editor. 2020, Wisconsin Department of Natural Resources: Madison, Wisconsin. <https://dnr.wisconsin.gov/sites/default/files/topic/WildlifeHabitat/wolfreport2020.pdf>.
122. Natural Resources Board, Adoption of Board Order WM-09012(E) relating to wolf hunting and trapping regulations, establishment of a depredation program, and approval of a harvest quota and permit level, N.R. Board, Editor. 2012, Wisconsin Department of Natural Resources: Madison, WI. p. 58.
123. Natural Resources Board, Request approval of a wolf harvest quota and number of licenses to issue for the 2013-2014 wolf hunting and trapping season. 2013, Department of Natural Resources. : Madison, Wisconsin
124. Natural Resources Board, Request approval of a wolf harvest quota and number of licenses to issue for the 2014-2015 wolf hunting and trapping season. 2014, Department of Natural Resources. : Madison, Wisconsin p. 10.
125. Wydeven, A.P., J. Wiedenhoeft, R.N. Schultz, R.P. Thiel, R.R. Jurewicz, B. Kohn, and T.R. Van Deelen, History, population growth and management of wolves in Wisconsin, in Recovery of Gray Wolves in the Great Lakes Region of the United States:

- an Endangered Species Success Story, A.P. Wydeven, T.R. Van Deelen, and E.J. Heske, Editors. 2009, Springer: New York. p. 87-106.
126. Fuller, T.K., Population dynamics of wolves in north central Minnesota. *Wildlife Monographs*, 1989. 105: p. 3-41.
127. Fuller, T.K., L.D. Mech, and J.F. Cochrane, Wolf population dynamics, in *Wolves: Behavior, ecology, and conservation*, L.D. Mech and L. Boitani, Editors. 2003, University of Chicago Press: Chicago. p. 161-191.
128. Treves, A., K.A. Martin, J.E. Wiedenhoeff, and A.P. Wydeven, Dispersal of gray wolves in the Great Lakes region, in *Recovery of Gray Wolves in the Great Lakes Region of the United States: An Endangered Species Success Story*, A.P. Wydeven, T.R. Van Deelen, and E.J. Heske, Editors. 2009, Springer: New York. p. 191-204.
129. Treves, A., Memo: RIN:1018-BD60 proposed rule to remove federal protections for gray wolves nationwide. 2020: <http://faculty.nelson.wisc.edu/treves/CCC.php>.
<https://www.reginfo.gov/public/do/viewEO12866Meeting?viewRule=false&rin=1018-BD60&meetingId=6065&acronym=1018-DOI/FWS>.
130. Adams, L.G., R.O. Stephenson, B.W. Dale, R.T. Ahgook, and D.J. Demma, Population dynamics and harvest characteristics of wolves in the Central Brooks Range, *Alaska Wildlife Monographs*, 2008. 170: p. 1-25.
131. Vucetich, J.A., Appendix: The influence of anthropogenic mortality on wolf population dynamics with special reference to Creel and Rotella (2010) and Gude et al. (2011) in the Final peer review of four documents amending and clarifying the Wyoming gray wolf management plan. *Federal Register*, 2012. 50: p. 78-95.
<https://www.federalregister.gov/documents/2012/05/01/2012-10407/endangered-and-threatened-wildlife-and-plants-removal-of-the-gray-wolf-in-wyoming-from-the-federal>.
132. Gude, J.A., M.S. Mitchell, R.E. Russell, C.A. Sime, E.E. Bangs, L.D. Mech, and R.R. Ream, Wolf population dynamics in the U.S. Northern Rocky Mountains are affected by recruitment and human-caused mortality. *Journal of Wildlife Management*, 2012. 76(1): p. 108-118.
133. Stenglein, J., Survival of Wisconsin's gray wolves from endangered to harvested, 1980 – 2013. 2014, University of Wisconsin-Madison.
134. Stenglein, J.L., J. Zhu, M.K. Clayton, and T.R. Van Deelen, Are the numbers adding up? Exploiting discrepancies among complementary population models. *Ecology and Evolution*, 2015. 5(2): p. 368-376.
135. Stenglein, J.L., T.R. Van Deelen, A.P. Wydeven, D.J. Mladenoff, J. Wiedenhoeff, J.A. Langenberg, and N.J. Thomas, Mortality patterns and detection bias from carcass data: An example from wolf recovery in Wisconsin. *Journal of Wildlife Management*, 2015. 7: p. 1173-1184.
136. Stenglein, J.L., J.H. Gilbert, A.P. Wydeven, and T.R. Van Deelen, An individual-based model for southern Lake Superior wolves: A tool to explore the effect of human-caused mortality on a landscape of risk. *Ecological Modelling*, 2015. 302: p. 13-24.
137. Stenglein, J.L. and T.R. Van Deelen, Demographic and Component Allee Effects in Southern Lake Superior Gray Wolves. *PLOS ONE*, 2016. 11(3): p. 10.1371/journal.pone.0150535

138. Stenglein, J.L., A.P. Wydeven, and T.R. Van Deelen, Compensatory mortality in a recovering top carnivore: wolves in Wisconsin, USA (1979–2013). *Oecologia*, 2018. 187(1): p. 99–111. <https://doi.org/10.1007/s00442-018-4132-4>.
139. Schmidt, J.H., D.S. Johnson, M.S. Lindberg, and L.G. Adams, Estimating demographic parameters using a combination of known-fate and open N-mixture models. *Ecology*, 2015. 56(10): p. 2583–2589. <http://dx.doi.org/10.1890/15-0385.1>.
140. Epstein, Y., Killing Wolves to Save Them? Legal Responses to ‘Tolerance Hunting’ in the European Union and United States. *RECIEL*, 2017. 26(1): p. 19-29.
141. Roosevelt, T.D., *Hunting the Grisly and Other Sketches*. 1902, New York: G. P. Putnam's Sons. <https://www.gutenberg.org/files/3337/3337-h/3337-h.htm>
142. Roosevelt, T.D., *A Book-Lover's Holidays in the Open*. 1916, New York: Charles Scribner's Sons. <https://www.gutenberg.org/files/34135/34135-h/34135-h.htm>
143. Treves, A., K.A. Artelle, and P.C. Paquet, Differentiating between regulation and hunting as conservation interventions. *Conservation Biology* 2018. 33(2): p. 472–475. DOI:10.1111/cobi.13211.
144. Holsman, R.H., Goodwill hunting? Exploring the role of hunters as ecosystem stewards. *Wildlife Society Bulletin*, 2000. 28(4): p. 808-816. <http://www.jstor.org/stable/3783835>
145. Woodroffe, R. and J.R. Ginsberg, Edge effects and the extinction of populations inside protected areas. *Science*, 1998. 280: p. 2126-2128.
146. McLellan, B.N., F.W. Hovey, R.D. Mace, J.G. Woods, D.W. Carney, M.L. Gibeau, W.L. Wakkinen, and W.F. Kasworm, Rates and causes of grizzly bear mortality in the Interior Mountains of British Columbia, Alberta, Montana, Washington, and Idaho. *Journal of Wildlife Management*, 1999. 63(3): p. 911-920.
147. McLellan, B., G. Mowat, and C. Lamb, Estimating unrecorded human-caused mortalities of grizzly bears in the Flathead Valley, British Columbia, Canada. *PeerJ*, 2018. 6: p. e5781. <https://doi.org/10.7717/peerj.5781>.
148. Creel, S., M. Becker, D. Christianson, E. Dröge, N. Hammerschlag, M.W. Hayward, K.U. Karanth, A.J. Loveridge, D. Macdonald, W. Matandiko, J. M'soka, D. Murray, E. Rosenblatt, and P. Schuette, Questionable policy for large carnivore hunting. *Science*, 2015. 350(6267): p. 1473-1475.
149. Laundré, J.W. and C. Papouchis, The Elephant in the room: What can we learn from California regarding the use of sport hunting of pumas (*Puma concolor*) as a management tool? *PLoS ONE* 2020. 15(2): p. e0224638. <https://doi.org/10.1371/journal.pone.0224638>.
150. Artelle, K.A., S.C. Anderson, A.B. Cooper, P.C. Paquet, J.D. Reynolds, and C.T. Darimont, Confronting uncertainty in wildlife management: Performance of grizzly bear management. *PLoS ONE*, 2013. 8(11): p. 1-9.
151. Loveridge, A.J., J.C. Reynolds, and E.J. Milner-Gulland, Does sport hunting benefit conservation?, in *Key Topics in Conservation Biology*, D. MacDonald and K. Service, Editors. 2007, Oxford University Press: Oxford. p. 224-241.
152. Nichols, J.D., F.A. Johnson, B.K. Williams, and G.S. Boomer, Science Alive and Well in North American Wildlife Management. *Science Advances* (eLetter 3 April 2018), 2018. 4(3): p. eaao0167. 10.1126/sciadv.aao0167.

153. Di Minin, E., C. Bradshaw, and N. Leader-Williams, Banning trophy hunting will exacerbate biodiversity loss. *Trends in Ecology and Evolution*, 2016. 31: p. 99-102.
154. Dickman, A., R. Cooney, P.J. Johnson, M.P. Louis, D. Roe, and a. signatories, Trophy hunting bans imperil biodiversity. *Science (Letter)*, 2019. 365(6456): p. 874. 10.1126/science.aaz0735.
155. Dickman, A., R. Cooney, P.J. Johnson, M.P. Louis, and D. Roe, RE: Trophy hunting: Insufficient evidence. *Science eLetter*, 2019.
https://science-sciencemag-org.ezproxy.library.wisc.edu/content/366/6464/435.1/tab-e-letters?_ga=2.54336424.1272848709.1572268918-1293948498.1530634101.
156. Batcheller, G.R., M.C. Bambery, L. Bies, T. Decker, S. Dyke, D. Guynn, M. McEnroe, M. O'Brien, J.F. Organ, S.J. Riley, and G. Roehm^(ed), The Public Trust Doctrine: Implications for Wildlife Management and Conservation in the United States and Canada. 2010, The Wildlife Society, the Association of Fish and Wildlife Agencies (AFWA), the Western Association of Fish and Wildlife Agencies (WAFWA), and the Wildlife Management Institute (WMI): Bethesda, MD.
157. Geist, V., S. Mahoney, and J.F. Organ, Why hunting has defined the North American model of wildlife conservation. *Transactions of the North American Wildlife and Natural Resources Conference*, 2001. 66: p. 175-185.
158. Treves, A., F.J. Santiago-Ávila, V.D. Popescu, P.C. Paquet, W.S. Lynn, C.T. Darimont, and K.A. Artelle, Trophy hunting: Insufficient evidence. *Science*, 2019. 366(6464): p. 435. 10.1126/science.aaz4389.
<https://science.sciencemag.org/content/366/6464/435.1>.
159. Macdonald, D.W., A.J. Loveridge, A. Dickman, P.J. Johnson, K.S. Jacobsem, and B. De Preez, Lions, trophy hunting and beyond: knowledge gaps and why they matter. *Mammal Review*, 2017. 47(4): p. 247-253.
160. Macdonald, D.W., *Mammal Conservation: Old Problems, New Perspectives, Transdisciplinarity, and the Coming of Age of Conservation Geopolitics*. *Annual Review of Environment and Resources*, 2019. 44(1): p. 61-88. 10.1146/annurev-environ-101718-033039.
161. Treves, A. and L. Naughton-Treves, Evaluating lethal control in the management of human-wildlife conflict, in *People and Wildlife, Conflict or Coexistence?*, R. Woodroffe, S. Thirgood, and A. Rabinowitz, Editors. 2005, Cambridge University Press: Cambridge, UK. p. 86-106.
162. Treves, A., Hunting to conserve large carnivores. *Journal of Applied Ecology*, 2009. 46: p. 1350-1356.
163. Bruskotter, J.T., S. Enzler, and A. Treves, Rescuing wolves from politics: wildlife as a public trust resource. *Science*, 2011. 333(6051): p. 1828-1829.
164. Bruskotter, J.T., S. Enzler, and A. Treves, Response to Mech and Johns. *Science*, 2012. 335(17): p. 795.
165. Koot, S., P. Hebinck, and S. Sullivan, Science for Success—A Conflict of Interest? Researcher Position and Reflexivity in Socio-Ecological Research for CBNRM in Namibia. *Society & Natural Resources*, 2020: p. 1-18. 10.1080/08941920.2020.1762953.

166. Virtanen, P., Local management of global values: Community-based wildlife management in Zimbabwe and Zambia. *Society and Natural Resources*, 2003. 16: p. 179-190.
167. Ericsson, G. and T.A. Heberlein, Attitudes of hunters, locals, and the general public in Sweden now that the wolves are back. *Biological Conservation*, 2003. 111: p. 149-159.
168. Humane Society of the U.S. et al. v U.S. Department of the Interior. 2006, District Court, Washington D.C.
169. Mincher, B.J., Harvest as a component of Greater Yellowstone Ecosystem grizzly bear management. *Wildlife Society Bulletin*, 2002. 30(4): p. 1287-1292
170. Refsnider, R., The Role of the Endangered Species Act in Midwest Wolf Recovery, in *Recovery of gray wolves in the Great Lakes region of the United States: An endangered species success story*, A.P. Wydeven, T.R. Van Deelen, and E.J. Heske, Editors. 2009, Springer: New York. p. 311-330.
171. Murtaugh, P.A., On rejection rates of paired intervention analysis. *Ecology*, 2002. 83: p. 1752–1761.
172. Popescu, V.D., P. de Valpine, D. Tempel, and M.Z. Peery, Estimating population impacts via dynamic occupancy analysis of Before-After Control-Impact studies. *Ecological Applications*, 2012. 22: p. 1389–1404.
173. Stewart-Oaten, A., On rejection rates of paired intervention analysis: comment. *Ecology* 84, 2795–2799, 2003. 84: p. 2795–2799.
174. Browne-Núñez, C., A. Treves, D. Macfarland, Z. Voyles, and C. Turng, Tolerance of wolves in Wisconsin: A mixed-methods examination of policy effects on attitudes and behavioral inclinations. *Biological Conservation*, 2015. 189: p. 59–71.
175. Bruskotter, J.T., J.A. Vucetich, S. Enzler, A. Treves, and M.P. Nelson, Removing protections for wolves and the future of the U.S. Endangered Species Act (1973) *Conservation Letters*, 2013. 7: p. 401-407.
176. St. John, F.A.V., A.M. Keane, G. Edwards-Jones, L. Jones, R.W. Yarnell, and J.P. Jones, Identifying indicators of illegal behavior: carnivore killing in human-managed landscapes. *Proceedings of the Royal Society B-Biological Sciences*, 2012. 279: p. 804-812.
177. Marchini, S. and D.W. Macdonald, Predicting ranchers' intention to kill jaguars: Case studies in Amazonia and Pantanal. *Biological Conservation*, 2012. 147: p. 213-221.
178. Treves, A. and J.T. Bruskotter, Tolerance for predatory wildlife. *Science*, 2014. 344(6183): p. 476-477.
179. Kahler, J.S. and M.L. Gore, Beyond the cooking pot and pocket book: factors influencing noncompliance with wildlife poaching rules. *International Journal of Comparative and Applied Criminal Justice*, 2012. DOI:10.1080/01924036.2012.669913.
180. Liberg, O., G. Chapron, P. Wabakken, H.C. Pedersen, N.T. Hobbs, and H. Sand, Shoot, shovel and shut up: cryptic poaching slows restoration of a large carnivore in Europe. *Proceedings of the Royal Society of London Series B*, 2012. 270: p. 91-98.
181. Chapron, G., P. Kaczensky, J.D.C. Linnell, M. von Arx, D. Huber, H. Andrén, J.V. López-Bao, M. Adamec, F. Álvares, O. Anders, L. Balčiauskas, V. Balys, P. Bedř, F.

- Bego, J.C. Blanco, U. Breitenmoser, H. Brøseth, L.k. Bufka, R. Bunikyte, P. Ciucci, A. Dutsov, T. Engleder, C. Fuxjäger, C. Groff, K. Holmala, B. Hoxha, Y. Iliopoulos, O. Ionescu, J. Jeremić, K. Jerina, G. Kluth, F. Knauer, I. Kojola, I. Kos, M. Krofel, J. Kubala, S. Kunovac, J. Kusak, M. Kutal, O. Liberg, A. Majić, P. Männil, R. Manz, E. Marboutin, F. Marucco, D. Melovski, K. Mersini, Y. Mertzanis, R.W. Mysłajek, S. Nowak, J. Odden, J. Ozolins, G. Palomero, M. Paunović, J. Persson, H. Potočnik, P.-Y. Quenette, G. Rauer, I. Reinhardt, R. Rigg, A. Ryser, V. Salvatori, T. Skrbinšek, A. Stojanov, J.E. Swenson, L. Szemethy, A. Trajçe, E. Tsingarska-Sedefcheva, M. Váňa, R. Veeroja, P. Wabakken, M. Wölf, S. Wölf, F. Zimmermann, D. Zlatanova, and L. Boitani, Recovery of large carnivores in Europe's modern human-dominated landscapes. *Science*, 2014. 346(6216): p. 1517.
182. Nie, M.A., Wolf recovery and management as value-based political conflict. *Ethics, Place and Environment*, 2002. 5(1): p. 65-71.
183. Lute, M.L. and M.L. Gore, Stewardship as a path to cooperation? Exploring the role of identity in intergroup conflict among Michigan wolf stakeholders. *Human Dimensions of Wildlife*, 2014. 19(3): p. 267-279.
184. Kaltenborn, B.P. and S.M. Brainerd, Can poaching inadvertently contribute to increased public acceptance of wolves in Scandinavia? *European Journal of Wildlife Research*, 2016. 62(2): p. 179–188.
185. Lewis, M.S., G. Pauley, Q. Kujala, J.A. Gude, Z. King, and K. Skogen, Selected Results from Four Separate Surveys of Resident Montanans Regarding Montana's Wolf Hunt, in HD Unit Research Summary No. 34. 2012, Montana Fish Wildlife and Parks. p. 8.
186. Heberlein, T.A. and G. Ericsson, Public attitudes and the future of wolves *Canis lupus* in Sweden. *Wildlife Biology*, 2008. 14: p. 391-394.
187. Majic, A. and A. Bath, Changes in attitudes toward wolves in Croatia. *Biological Conservation*, 2010. 143: p. 255-260.
188. Majić, A., A. Bondonia, D. Huber, and N. Bunnefeld, Dynamics of public attitudes toward bears and the role of bear hunting in Croatia. *Biological Conservation*, 2011. 144(12): p. 3018-3027.
189. Kaczensky, P., M. Blazic, and H. Gossow, Public attitudes towards brown bears (*Ursus arctos*) in Slovenia. *Biological Conservation*, 2004. 118: p. 661–674.
190. Bruskotter, J.T., J.A. Vucetich, K.M. Slagle, R. Berardo, A.S. Singh, and R.S. Wilson, Support for the U.S. Endangered Species Act over time and space: Controversial species do not weaken public support for protective legislation. *Conservation Letters*, 2018. ;e12595: p. 1-7. <https://doi.org/10.1111/conl.12595>.
191. Slagle, K.M., J.T. Bruskotter, A.S. Singh, and R.H. Schmid, Attitudes toward predator control in the United States: 1995 and 2014. *Journal of Mammalogy*, 2017. 8(1): p. 7-16.
192. Kinzig, A.P., P.R. Ehrlich, L.J. Alston, K. Arrow, S. Barrett, T.G. Buchman, G.C. Daily, B. Levin, S. Levin, M. Oppenheimer, E. Ostrom, and D. Saari, Social Norms and Global Environmental Challenges: The Complex Interaction of Behaviors, Values, and Policy. *Bioscience*, 2013. 63: p. 164–175.

193. Byerly, H., A. Balmford, P.J. Ferraro, C.H. Wagner, E. Palchak, S. Polasky, T.H. Ricketts, A.J. Schwartz, and B. Fisher, Nudging pro-environmental behavior: evidence and opportunities. *Frontiers in Ecology and the Environment*, 2018: p. doi:10.1002/fee.1777.
194. Gore, M.L., J. Ratsimbazafy, and M.L. Lute, Rethinking corruption in conservation crime: insights from Madagascar. *Conservation Letters*, 2013. 6(6): p. 430-438.
195. Gore, M.L., ed. *Conservation Criminology*. 2017, John Wiley & Sons: New York.
196. Filteau, M.R., Deterring Defiance: 'Don't Give a Poacher a Reason to Poach'. *International Journal of Rural Criminology*, 2012. 1(2): p. 236-255.
197. von Essen, E., H.P. Hansen, H.N. Kallstrom, M.N. Peterson, and T.R. Peterson, The radicalisation of rural resistance: How hunting counterpublics in the Nordic countries contribute to illegal hunting. *Journal of Rural Studies* 2015. 39: p. 199-209.
198. Kaltenborn, B.P., T. Bjerke, and J. Nyahongo, Living with problem animals - Self-reported fear of potentially dangerous species in the Serengeti region, Tanzania. *Human Dimensions of Wildlife*, 2006. 11(6): p. 397 – 409.
199. Agan, S.W., A. Treves, and L. Willey, Wild red wolf *Canis rufus* poaching risk. bioRxiv, 2020. <https://doi.org/10.1101/2020.12.08.416032>.
200. Olson, E.R., J.L. Stenglein, Victoria Shelley, Adena R. Rissman, Christine Browne-Núñez, Zachary Voyles, A.P. Wydeven, and T.V. Deelen, Pendulum swings in wolf management led to conflict, illegal kills, and a legislated wolf hunt. *Conservation Letters*, 2015. 8(5): p. 351-360.
201. Liberg, O., J. Suutarinen, M. Åkesson, H. Andrén, P. Wabakken, C. Wikenros, and H. Sand, Poaching-related disappearance rate of wolves in Sweden was positively related to population size and negatively to legal culling. *Biological Conservation*, 2020. 243. 10.1016/j.biocon.2020.108456.
202. Suutarinen, J. and I. Kojola, One way or another: predictors of wolf poaching in a legally harvested wolf population. *Animal Conservation*, 2018. 21(5): p. –9. <https://doi.org/10.1111/acv.12409>. <https://doi.org/10.1111/acv.12409>.
203. Suutarinen, J. and I. Kojola, Poaching regulates the legally hunted wolf population in Finland. *Biological Conservation*, 2017. 215: p. 11–18. <http://www.sciencedirect.com/science/article/pii/S0006320717302148>.
204. Troxell, P.S., K.A. Berg, H. Jaycox, A.L. Strauss, P. Struhsacker, and P. Callahan, Education and Outreach Efforts in Support of Wolf Conservation in the Great Lakes Region, in *Recovery of Gray Wolves in the Great Lakes Region of the United States: an Endangered Species Success Story*, A.P. Wydeven, T.R. Van Deelen, and E.J. Heske, Editors. 2009, Springer: New York. p. 297-309.
205. Frazer, G., Letetr to Eric Sklar, President, California Fish and Game Commission FWS/AES/DCC/BDFS/073807, U.S.F.W. Service, Editor. 2020: Washington, DC. http://faculty.nelson.wisc.edu/treves/archive_BAS/Frazer%20USFWS%20to%20Sklar%20OCA%20FG%20Commission.pdf.
206. Atkins, Summary Report of Independent Peer Reviews for the U.S. Fish & Wildlife Service Gray Wolf Delisting Review. 2019, Atkins: 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.

207. Obama, B., Presidential Documents: Improving Regulation and Regulatory Review. Federal Register, 2011. 76(14): p. 3821-3823.
208. USC, Endangered Species Act of 1973, amended 2006, in 16 U.S.C. §§ 1533(a)(1)(A-E). 2006.
209. Department of Commerce, N. and F. Department of the Interior, Revised Interagency Cooperative Policy Regarding the Role of State Agencies in Endangered Species Act Activities. Federal Register, 2016. 81: p. 8663-8665.
<http://www.fws.gov/endangered/laws-policies/policy-state-agencies.html> accessed 12 April 2016.
210. Epstein, Y. and J. Darpö, The Wild Has No Words: Environmental NGOs Empowered to Speak for Protected Species as Swedish Courts Apply EU and International Environmental Law. Journal for European Environmental and Planning Law, 2013. 10(3): p. 250–261.
211. Epstein, Y., Governing Ecologies: Species Protection in Overlapping and Contiguous Legal Regimes, in Faculty of Social Sciences. 2013, Uppsala. p. 26.
212. Epstein, Y. and G. Chapron, The Hunting of Strictly Protected Species: The Tapiola Case and the Limits of Derogation under Article 16 of the Habitats Directive. European Energy and Environmental Law Review 2018. June: p. 78-87.
213. Epstein, Y., J. Lopez-Bao, A. Trouwborst, and G. Chapron, EU Court: Science must justify future hunting. Science, 2019. 366(6468): p. 961.
214. Mukherjee, S., The Emperor of All Maladies: A Biography of Cancer. 2010, New York: Scribner.
215. Mukherjee, S., The Gene: an Intimate History. 2016, New York: Simon & Schuster.
216. Kricher, J., The Balance of Nature: Ecology's Enduring Myth. 2009, Princeton, NJ: Princeton University Press.
217. Eklund, A., J.V. López-Bao, M. Tourani, G. Chapron, and J. Frank, Limited evidence on the effectiveness of interventions to reduce livestock predation by large carnivores. Scientific Reports, 2017. 7: p. 2097 | DOI:10.1038/s41598-017-02323-w.
218. Khorozyan, I. and M. Waltert, How long do anti-predator interventions remain effective? Patterns, thresholds and uncertainty. Royal Society Open Science, 2019. 6(9). 10.1098/rsos.190826.
219. Lennox, R.J., A.J. Gallagher, E.G. Ritchie, and S.J. Cooke, Evaluating the efficacy of predator removal in a conflict-prone world. Biological Conservation, 2018. 224: p. 277-289.
220. Miller, J., K. Stoner, M. Cejtin, T. Meyer, A. Middleton, and O. Schmitz, Effectiveness of Contemporary Techniques for Reducing Livestock Depredations by Large Carnivores. Wildlife Society Bulletin, 2016. 40: p. 806-815.
221. Moreira-Arce, D., C.S. Ugarte, F. Zorondo-Rodríguez, and J.A. Simonetti, Management Tools to Reduce Carnivore-Livestock Conflicts: Current Gap and Future Challenges. Rangeland Ecology & Management, 2018.

222. Treves, A., M. Krofel, and J. McManus, Predator control should not be a shot in the dark. *Frontiers in Ecology and the Environment*, 2016. 14: p. 380-388.
223. van Eeden, L.M., A. Eklund, J.R.B. Miller, J.V. López-Bao, M.R. Cejtin, G. Chapron, M.S. Crowther, C.R. Dickman, J. Frank, M. Krofel, D.W. Macdonald, J. McManus, T.K. Meyer, A.D. Middleton, T.M. Newsome, W.J. Ripple, E.G. Ritchie, O.J. Schmitz, K.J. Stoner, M. Tourani, and A. Treves, Carnivore conservation needs evidence-based livestock protection. *PLOS Biology*, 2018. | 16(9). e2005577. <https://doi.org/10.1371/journal.pbio.2005577>.
224. van Eeden, L.M., M.S. Crowther, C.R. Dickman, D.W. Macdonald, W.J. Ripple, E.G. Ritchie, and T.M. Newsome, Managing conflict between large carnivores and livestock. *Conservation Biology*, 2018. doi: 10.1111/cobi.12959.
225. Khorozyan, I. and M. Waltert, Not all interventions are equally effective against bears: patterns and recommendations for global bear conservation and management. *Scientific Reports*, 2020. in press. 10.1098/rsos.190826.

**Public comment to Wolf Harvest Advisory Committee, the Wolf
Management Planning Committee, the WDNR, and the WI NRB
18 June 2021 from Prof. Adrian Treves, PhD**

Thanks for the opportunity to comment on your proposed agenda and debates. I wish you good luck and thoughtful deliberation respecting the public trust duties assigned to you.

I applied with my lab colleagues to serve as independent scientific voices. We were declined. Therefore, I caution against debating the science within your group because the WDNR has not selected a group with diverse experience and worldview relating to wolf science. So, my comment here is restricted to helping you distinguish good science from better science and choose the better. Obviously, I think my lab's is the best but make up your own mind with the principles below drawn from the National Academies of Science's (NAS 2017) manual on fostering scientific integrity.

I have commented on the science of wolf policy in Wisconsin at length in various public comment periods. You can find all of the science and evidence I cited here and more at <http://faculty.nelson.wisc.edu/treves/publications.php> for free download. At this link (http://faculty.nelson.wisc.edu/treves/pubs/Treves_FSA_Putrevu_inal.pdf) you can find our most recent paper in press, which quantifies the effects of the February 2021 wolf hunt on the population status. This peer-reviewed paper comes out in the international peer-reviewed scientific journal PeerJ in the next few weeks (Treves, Santiago-Ávila et al. 2021).

You will also see an explanation of public trust duties and why the North American Model of wildlife management (NAM) distorts or ignores the fundamental role of the public trust (Wood 2009, Bruskotter,ENZLER et al. 2011, Bruskotter,ENZLER et al. 2012, Wood 2013, Nie, Barns et al. 2017, Treves, Chapron et al. 2017, Treves, Artelle et al. 2018, Treves, Santiago-Ávila et al. 2018, Nie, Landers et al. 2020).

During your discussions, you will probably hear a lot of opinions and assertions of fact (fact claims), which can be hard to disentangle because people tend to mix the two. It may also not be obvious that the state makes assertions of fact without the best available science behind them. The following four steps should help you to discriminate unsupported fact claims from ones that are substantiated and discern good evidence from poor.

For example, an interest group that asserts that “wolves need population control” most likely means something akin to “I feel there should be fewer wolves.” The word ‘need’ should be viewed with skepticism until one is talking about survival or subsistence. Wolves--like all wildlife--do not need our help to control their population densities or geographic range. They do that themselves (see my Appendix to prior public comments in full).

You may also hear variations on “agencies need flexibility to kill problem wolves.” Translate this as “I believe agencies should have flexibility...” and ask the speaker to translate “flexibility” and identify the “problem” wolves pose very precisely. These mixes of opinion (a personal value judgment usually) and fact claims are nowhere more obvious than in how most U.S. wildlife agencies, many ex-agency staff, and wildlife-consumers talk about killing wildlife, using euphemisms such as flexibility when they mean kill, harvest when they mean hunt, recreation when they mean killing for fun, and blood buys goodwill for a variety of unclear reasons. Proponents of these euphemisms and views may be sitting around you, so you are their equal and should feel empowered to question the euphemisms to make them transparent.

Note: For the scientific evidence evaluating whether blood does or does not buy goodwill, whether killing wolves does or does not protect domestic animals, and other claims about conserving wolves, see my May 15th public comment please (Appendix).

What role do facts play in your deliberations?

Science and facts do not make decisions. People make decisions based on their values but informed by facts and evidence. The science can tell us what has been, what is now, and what might be, and how to evaluate actions and their consequences. People with values still have to decide (Lynn 2010, Santiago-Ávila, Treves et al. 2020).

You may disagree with personal opinions and personal value judgments because your values differ but one doesn't evaluate opinions and value judgments with evidence. Those are two different sources of knowledge ("I feel" versus "I know").

How do we know something?

Imperfect as we humans are, so is our knowledge. But science does approximate knowledge of reality. And some scientific observations, measurements, or analyses are better approximations than others.

Here's how you can tell good from better science in four steps:

1. Transparency: Transparency is the most important principle of the best available science (NAS 2017) so if someone states a fact without evidence their statement is not scientific. The science that is more transparent is more reliable because it makes clear its assumptions, its methods, and shares the data it uses.

If the authors do not share the data, they are likely trying to hide something (or being forced to hide something). The reason better science is more transparent is because it allows a peer scientist to reproduce the results (or not) independently without having to trust the original authors (NAS 2017). See also citations to scientific integrity and reproducibility from the international scientific community in Treves 2019, Treves 2019, Treves and Santiago-Ávila 2020, Treves and Batavia 2021, Treves, Paquet et al. 2021.

There is a shortcut many scientists and others use for referring to facts or evidence rather than describing the assumptions, methods, and analyses fully. That shortcut is to cite a peer-reviewed, published scientific study as I have been doing (e.g., name and year, sometimes with additional names or 'et al.' which means 'and others' in Latin, and sometimes a lowercase letter a, b, c, etc, after the year to denote multiple peer-reviewed articles in the same year). The full citation should be in footnotes or endnotes. Given the shortcut is also a shorthand, it pays to look at the full citation for several reasons: if the person asserting a fact is one of the authors, they should be able to answer all questions about the methods, data, and assumptions. If the journal has no ISI impact factor or a low one (using a Google search) or if the journal has unclear editorial policies (e.g., Proceedings of the Vertebrate Pest Conference) one's skepticism should increase. Sometimes but not always the ISI impact factor reflects the quality of journals, but it is not necessarily appropriate to judge individual research articles that way. Yet, a scientist who published all or most of their articles in a single, low-ranked journal suggests they may be struggling to pass peer review at stronger journals.

2. Independent review: The scientific community requires complete transparency to take the first step in evaluating new science for its reliability and reproducibility (i.e., can the study be repeated or replicated?) by subjecting research to independent peer review, usually with 2-3 anonymous reviewers or reviewers with no personal or professional sympathies or antipathies to the authors or their institutions (Treves and Batavia 2021). “Peers” in this context means fellow scientists able to evaluate the quality of the work based on having done such work themselves or having studied the field for years. Transparency when thorough allows peer reviewers to independently confirm if the findings merit publication. This approval is only the first step in endorsing a scientific finding because subsequent checks on quality post-publication are equally or more important. I return to that topic in step 3.

Despite the importance of independent review, most government wildlife agencies do not take the time or effort or cannot pass authentically independent peer review. In the scientific community, such literature is called gray or white literature (e.g., Greenfire 2021), because it has not undergone the transparency of independent review and is therefore less reliable.

So be skeptical of unpublished or non-peer-reviewed reports or reports reviewed by reviewers selected by the agency or the authors. No matter how deep the voice, no matter how many years of experience someone claims (or years on the land or years of hunting), opinions without substantiating evidence are all equivalently unreliable and questionable because experiences, anecdotes, and opinions are not transparent about methods, assumptions, or data.

Now let's imagine that two or more peer-reviewed studies seem equally transparent but differ in an important result (observation, measurement or result of analysis) in step 3.

3. Strength of inference: The only way to distinguish good science from better science when the two are equally transparent and independently peer-reviewed is by scrutinizing the methods to evaluate the strength of the inference and the potential biases. Bias in scientific terms refers to inaccuracy or imprecision of estimates, observations, or measurements, which can distort results to a smaller or larger extent.

The better science is the one using a higher standard of inference (Treves, Krofel et al. 2019). A standard of inference is a globally accepted standard for confidence in the design used for that research. Note that here and below, the results are irrelevant to this evaluation — it judges only the quality of the methods. In the biomedical field and many other scientific fields that have wrestled with a problem of reproducibility (meaning many promising research findings failed to be replicated because of errors, fabrications, or unintentional biases), the gold-standard of reproducibility is achieved through randomized, controlled experiments (Ioannidis 2005). This standard is difficult to achieve in wildlife populations, but note it has been achieved many times for evaluating non-lethal methods for protecting domestic animals and property (Miller, Stoner et al. 2016, Treves, Krofel et al. 2016, Eklund, López-Bao et al. 2017, Lennox, Gallagher et al. 2018, Moreira-Arce, Ugarte et al. 2018, van Eeden, Crowther et al. 2018, van Eeden, Eklund et al. 2018, Khorozyan and Waltert 2019, Treves, Krofel et al. 2019, Khorozyan and Waltert 2020).

Because few other wildlife studies can achieve the gold standard, scientists recognize a silver standard of before-and-after comparison (Treves, Krofel et al. 2019). The silver standard means that wildlife were observed or measured before an event or human intervention and then the wildlife were observed or measured again afterwards. We used that standard when evaluating Michigan's lethal control program on wolves (Santiago-Avila, Cornman et al. 2018). This study is the best of its kind in my opinion because of transparency and improving on the methods in (Bradley, Robinson et al. 2015), which attempted a similar comparison but were not transparent in several ways. Even though it is better than Bradley in

transparency, Santiago-Ávila's analysis nevertheless only rises to the level of silver standard because before-and-after comparisons introduce an uncontrolled variable of time among other possible uncertainties. Therefore, we called on the state of Michigan (and proposed such for Wisconsin at other times) to perform the gold standard experiment if they claim lethal management is effective. It has been years now with no such experiment being conducted.

Some studies do not achieve the silver standard because they are only correlational. Many models fall into this category including my own work at times because we lacked the time, resources, or foresight to conduct the before-and-after comparison. This lowest standard, or bronze standard, is the weakest because so many confounding variables are left uncontrolled. If no stronger inference exists (that is reliable), then correlations may be the only basis for a decision but always remember they represent weak inference (Treves, Krofel et al. 2019).

In the final step 4, we'll consider a hypothetical situation in which two studies seem equally transparent with equally strong inference, but differ in a key finding.

4. The need for more information and comprehensive disclosures of potentially competing

interests: Sometimes statistical and analytical methods are so complicated and unclear that even experts cannot distinguish good from better science based on scrutiny of fully transparent data, assumptions, and methods. This is rare in science but does happen and usually reflects the need for additional, better experiments or new data. There is one additional feature of better science that can help you distinguish between two pieces of scientific research even if they are equivalent in transparency, independent review, and strength of inference.

Did the authors declare or have undeclared, potentially competing interests (and what about the reviewers and editors?). Every human has interests so having an interest is not a problem by itself (Treves and Batavia 2021). Problematic interests are those that distort the results or methods because the author stands to gain from a certain finding. When the authors, reviewers, or editors stand to gain from a particular result either directly from material gain or indirectly through career advancement, fame, status, or the patronage of powerful, influential, or moneyed interests, then the interest may be potentially competing with the reliability of the scientific findings. Such competing interests do NOT disqualify a scientific finding necessarily, but they must be disclosed and discussed transparently by the authors, reviewers, and editors, or the process has been compromised. We as readers are allowed to judge those potentially competing interests and how they may have influenced the findings (Treves and Batavia 2021). For example, a researcher who is paid by a wildlife agency to complete a study is NOT independent of that agency and may have a competing interest to keep their donor or superior happy. Receiving funding is not a competing interest on its own because a scientist's findings may go against the wishes of the donor. Therefore, one should look especially carefully at findings that match the wishes of the donor because those are most vulnerable to a competing interest by the scientist who may intentionally or unintentionally skew the results in favor of the donor. So, ask about the competing interests for studies that are not made available to you and for the studies made available to you, look at the acknowledgments and competing interest statements. Finally, if the results support the preferences of powerful interest groups, look especially carefully at the methods. Follow the money and the careers.

Remember not to prefer a scientific study because of its results or conclusions--or because it conforms to your existing opinions or worldview. The best available science is judged on its methods, not its findings. You will see many people disparage a scientific finding because they don't like its results or its authors. They may not say it aloud but personal animosities and career advancement play a large role in such likes and dislikes.

I look forward to reviewing the studies produced in support of the agency's decisions in order to evaluate them using this four-step analysis. I also offer my advice to any of you who wish, no matter your worldview, if I can support the interpretation of scientific evidence.

Please see the Appendix below for my comments to WI DNR and NRB since January 2021. For links to our newest peer-reviewed paper estimating that the WI wolf population was cut down 27-33% from April 2020-April 2021, [click here](#).

References cited (all citations with Treves in list of authors are free for download here: <http://faculty.nelson.wisc.edu/treves/publications.php>)

- Bradley, E. H., H. S. Robinson, E. E. Bangs, K. Kunkel, M. D. Jimenez, J. A. Gude and T. Grimm (2015). "Effects of Wolf Removal on Livestock Depredation Recurrence and Wolf Recovery in Montana, Idaho, and Wyoming." *Journal of Wildlife Management* **79**(8): 1337–1346.
- Bruskotter, J. T., S. Enzler and A. Treves (2011). "Rescuing wolves from politics: wildlife as a public trust resource." *Science* **333**(6051): 1828-1829.
- Bruskotter, J. T., S. Enzler and A. Treves (2012). "Response to Mech and Johns." *Science* **335**(17): 795.
- Eklund, A., J. V. López-Bao, M. Tourani, G. Chapron and J. Frank (2017). "Limited evidence on the effectiveness of interventions to reduce livestock predation by large carnivores." *Scientific Reports* **7**: 2097 | DOI:2010.1038/s41598-41017-02323-w.
- Ioannidis, J. P. (2005). "Why Most Published Research Findings Are False." *PLOS Medicine* **2**(8): e124.
- Khorozyan, I. and M. Waltert (2019). "How long do anti-predator interventions remain effective? Patterns, thresholds and uncertainty." *Royal Society Open Science* **6**(9).
- Khorozyan, I. and M. Waltert (2020). "Not all interventions are equally effective against bears: patterns and recommendations for global bear conservation and management." *Scientific Reports in press*.
- Lennox, R. J., A. J. Gallagher, E. G. Ritchie and S. J. Cooke (2018). "Evaluating the efficacy of predator removal in a conflict-prone world." *Biological Conservation* **224**: 277-289.
- Lynn, W. S. (2010). "Discourse and Wolves: Science, Society and Ethics." *Society & Animals* **18**(1): 75-92.
- Miller, J., K. Stoner, M. Cejtin, T. Meyer, A. Middleton and O. Schmitz (2016). "Effectiveness of Contemporary Techniques for Reducing Livestock Depredations by Large Carnivores." *Wildlife Society Bulletin* **40**: 806-815.
- Moreira-Arce, D., C. S. Ugarte, F. Zorondo-Rodríguez and J. A. Simonetti (2018). "Management Tools to Reduce Carnivore-Livestock Conflicts: Current Gap and Future Challenges." *Rangeland Ecology & Management*.
- NAS, N. A. o. S. E. M. (2017). *Fostering Integrity in Research*. Washington, DC, The National Academies Press.
- Nie, M., C. Barns, J. Haber, J. Joly, K. Pitt and S. Zellmer (2017). "Fish and wildlife management on federal lands: Debunking state supremacy." *Environmental Law* **47**: 797-932.
- Nie, M., N. Landers and M. Bryan (2020). "The Public Trust in Wildlife: Closing the Implementation Gap in 13 Western States." *Environmental Law Reporter* **50**: 10909-10919.
- Santiago-Avila, F. J., A. M. Cornman and A. Treves (2018). "Killing wolves to prevent predation on livestock may protect one farm but harm neighbors." *PLoS ONE* **13**(1): e0189729
- Santiago-Ávila, F. J., A. Treves and W. S. e. c.-a. Lynn (2020). "Just preservation, trusteeship and multispecies justice." *Animal Sentience: Response to Commentary on Treves et al. on Just Preservation* **27**(27): 393-409.
- Treves, A. (2019). "Scientific ethics and the illusion of naïve objectivity." *Frontiers in Ecology and the Environment* **7**: 361.

Treves, A. (2019). Standards of evidence in wild animal research, The Brooks Institute for Animal Rights Policy & Law.

Treves, A., K. A. Artelle, C. T. Darimont, W. S. Lynn, P. C. Paquet, F. J. Santiago-Avila, R. Shaw and M. C. Wood (2018). "Intergenerational equity can help to prevent climate change and extinction." Nature Ecology & Evolution **2**: 204-207.

Treves, A. and C. Batavia (2021). "Improved disclosures of non-financial competing interests would promote independent review." Academia Letters **Article 514**: 1-9.

Treves, A., G. Chapron, J. V. López-Bao, C. Shoemaker, A. Goeckner and J. T. Bruskotter (2017). "Predators and the public trust." Biological Reviews **92**: 248-270.

Treves, A., M. Krofel and J. McManus (2016). "Predator control should not be a shot in the dark." Frontiers in Ecology and the Environment **14**: 380-388.

Treves, A., M. Krofel, O. Ohrens and L. M. Van Eeden (2019). "Predator control needs a standard of unbiased randomized experiments with cross-over design." Frontiers in Ecology and Evolution **7** 402-413.

Treves, A., P. C. Paquet, K. A. Artelle, A. M. Cornman, M. Krofel and C. T. Darimont (2021). "Transparency about values and assertions of fact in natural resource management." Frontiers in Conservation Science: Human-Wildlife Dynamics **2**: e631998.

Treves, A., F. Santiago-Ávila and W. S. Lynn (2018). "Just Preservation." Biological Conservation **229**: 134-141.

Treves, A. and F. J. Santiago-Ávila (2020). "Myths and assumptions about human-wildlife conflict and coexistence." Conservation Biology **34**(4): 811–818.

Treves, A., F. J. Santiago-Ávila and K. Putrevu (2021). "Quantifying the effects of delisting wolves after the first state began lethal management." PeerJ Life in press.

van Eeden, L. M., M. S. Crowther, C. R. Dickman, D. W. Macdonald, W. J. Ripple, E. G. Ritchie and T. M. Newsome (2018). "Managing conflict between large carnivores and livestock." Conservation Biology **doi: 10.1111/cobi.12959**.

van Eeden, L. M., A. Eklund, J. R. B. Miller, J. V. López-Bao, M. R. Cejtin, G. Chapron, M. S. Crowther, C. R. Dickman, J. Frank, M. Krofel, D. W. Macdonald, J. McManus, T. K. Meyer, A. D. Middleton, T. M. Newsome, W. J. Ripple, E. G. Ritchie, O. J. Schmitz, K. J. Stoner, M. Tourani and A. Treves (2018). "Carnivore conservation needs evidence-based livestock protection." PLOS Biology **16**(9).

Wood, M. C. (2009). "Advancing the sovereign trust of government to safeguard the environment for present and future generations (Part I): Ecological realism and the need for a paradigm shift." Environmental Law **43**: 44-88.

Wood, M. C. (2013). Nature's Trust. New York, Cambridge University Press.

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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.

Appendix of public comments in 2021 with scientific literature

Prof. Adrian Treves, PhD, offered the following comments on Wisconsin Wolf management:

16 June 2021: regarding the scarcity of evidence making the goals of WDNR regulations impossible to achieve, and the scarcity of evidence making hounding, night-time hunting, and snowmobile pursuit risky and unscientific. For the full text of the comment, [Click here](#)

4 June 2021: 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. [Click here.](#)

15 May 2021: regarding all aspects of wolf science relevant to your work, read below or [click here.](#) For the Appendices [click here](#) and for references cited [click here.](#)

Full text cover page of Prof. Treves' public comment submitted on 15 May 2021:

To: Wisconsin Natural Resources Board,
Wisconsin Department of Natural Resources,
Wolf Management Plan Committee, and
Wolf Harvest Advisory Committee

Via: Randy Johnson, WDNR Large Carnivore Specialist, Randy.Johnson@wisconsin.gov
Laurie J. Ross, Board Liaison, Laurie.Ross@wisconsin.gov

Re: Setting Quota for 2021 Wolf Hunting Season and Revision of Wolf Management Plan

Thank you for the opportunity to comment on Wisconsin's wolf management planning and the formulation of guidelines for a November 2021 wolf hunt. I am a Wisconsin resident and a professor at the University of Wisconsin in Madison. Specifically, I am a wolf ecologist and the founder of the Carnivore Coexistence Lab. I conduct interdisciplinary research on the human dimensions of wolf management and the law relating to coexistence with gray wolves. I have published more than 134 peer-reviewed scientific articles on ecology, management, and conservation. I have been investigating human-wolf coexistence in Wisconsin since 2000, with my most recent peer-reviewed scientific article on Wisconsin wolves published on May 10, 2021.

I will address four issues in my comments, and for the sake of brevity, will include supplemental information on each topic in appendices for your review, as well as providing a collection of scientific articles that are relevant to the critical issues.

First, as the Wisconsin Department of Natural Resources (DNR) revises its plan for the management of gray wolves, and takes immediate action to set a quota for the fall 2021 hunt, it must consider those actions in context of its role as a trustee, which must manage and conserve wildlife populations, including wolves, on behalf of current and future generations. I thus preface my comments on these upcoming decisions with a summary of my assumptions about the responsibilities of a public trustee, based on my extensive research about the duties in caring for a public asset such as wolves.

Second, because a trustee cannot manage an asset responsibly without full information, I describe the information and data that DNR must have before it makes management decisions about the Wisconsin wolf population, to avoid substantial impairment of that public asset.

Third, I discuss the lessons we have learned from the past history of Wisconsin wolf management and policy, drawing on my research into ecology, human dimensions of wildlife management and law. Finally, since I believe DNR must set realistic expectations for its wolf management goals, I end with a caution about what the science tells us that public wolf-hunting cannot achieve.

I. Duties of a Wildlife Trustee

Before DNR makes a decision about how to manage the wolf population, it must frame that decision in terms of how it interprets its duties as a public trustee of that wildlife asset. As a scientist working for a public institution, I believe I have my own duties as a public trustee, to provide the agency and the public with the best available science and help them to interpret diverse facts. I have extensively studied and published on the subject of the duties of a wildlife trustee, and I propose three primary principles to guide DNR's management decisions, including the decision on the upcoming fall 2021 hunt.

· First, the highest-priority duty for a wildlife trustee is to ensure that the health of wildlife populations is not substantially impaired. In the context of the Wisconsin wolf population, this means: (a) avoiding actions that will risk lowering the population to state listing level of 250; (b) protecting the renewal capacity of the public asset, by preventing harm to the reproductive capabilities of the wolf population; (c) preventing any harm to the wolf population that would result in the federal government removing the state from its trustee position by placing wolves back on the federal Endangered Species list--thus putting the U.S. Fish and Wildlife Service in the role of primary trustee; and (d) if any actions have already been taken that risk the harms detailed above, putting a plan in place to ensure that this damage is repaired.

· The second priority for a wildlife trustee is to preserve wildlife for future generations. This requires: (a) prioritizing future generations' interests in preservation over current users' interests in exploitation; (b) regulating use by current generations with precautions taken to protect against errors; and (c) preventing illegal, unregulated, or undetected uses that drain the public asset.

· Finally, the third priority for a wildlife trustee is to act transparently, so that the public on whose behalf it is managing the asset can see that it is doing so responsibly, effectively, and cost-efficiently. That requires: (a) demonstrating the use of the best available science and information to protect wildlife and regulate human uses; (b) providing accountability to all trust beneficiaries; (c) correcting errors forthrightly and honestly; (d) acting in a manner that is incorruptible and is not unduly influenced to favor one class of beneficiaries over another.

In Appendix 1, attached, I fully explore each of these trust responsibilities in the context of Wisconsin wolf management, with citations to scientific support.

This support includes a study that my colleagues and I have submitted for review, which concludes that during the February 2021 hunt, the state trustee allowed just over 300 wolf-hunters and wolf-poachers to reduce the state

wolf population by 27-33%. We predict that in order to allow the wolf population to recover from this impairment, the state would need to protect it from hunting or high rates of government lethal control for several years, assuming that reproduction has not also been substantially impaired.

II. Data DNR Must Have to Avoid Substantial Impairment of Trust Asset

As I detail in Appendix 1, Wisconsin could suffer from a substantial impairment to its wolf population as a result of: 1) damage to or deterioration of the reproductive output of the wolves; 2), numerical depletion of the wolf population; or 3) deterioration or loss of ecological functions in the wild ecosystems of the state.

My primary concern with the future of Wisconsin wolf management is that DNR does not seem to have sufficient information to assess the status of the wolf population, to determine if there has already been such a substantial impairment, especially following the February 2021 wolf hunt, or to allow it to measure the effects of future actions to prevent them from causing substantial impairment to pack reproduction, ecological function, or a self-sustaining healthy population. If DNR has this information, it has not been shared with the public, who are the beneficiaries of the wildlife trust resources that DNR manages on our behalf.

Before DNR takes additional actions that may impair the Wisconsin wolf population, such as setting a quota for any future wolf hunts, it must have information necessary to evaluate the current status of the population, and quantify the threats posed to pack reproduction, juvenile recruitment, ecological functions, and natural ecological interactions. I suggest that the revision of the Wolf Management Plan include processes to gain this baseline of information, to update it regularly, and to present it to the public in an accurate, precise, reliable, and unbiased form. The information needed to make responsible management decisions includes the following:

1. Number of wolf packs in the state and how many breed successfully each year
2. Number of wolves in each pack
3. Survival of juveniles and causes of death by November each year
4. Survival of adults and causes of death each year
5. Locations of illegal kills and methods and motivations of poachers) those who kill wolves illegally)
6. Effectiveness of non-lethal and lethal methods of protecting domestic animals from wolf predation
7. Detailed records of marked wolves (collared or otherwise tagged) from marking until death or disappearance, including locational data and cause of death or disappearance
8. The ecological effects of human-caused wolf mortality, including evaluation of the effects of intentional killing, whether by the public or by government agents
9. Reliable social science data on attitudes to wolves and tolerance for various scenarios involving coexistence with wolves, inclination to poach wolves, and support for DNR policies, measured in a uniform random sample of state residents and out-of-state hunters

10. Veterinary and pathological information on diseases and causes of death for a relatively large random sample of recovered wolf carcasses

11. Other information on changing rates of nonhuman causes of death or reproductive impairment each year

12. Critically, the effect on the wolf population after wolves were killed, nearly twice the state “quota,” in February 2021, and illegal kills since April 2020

Very little of this information is currently available. Until DNR has gathered sufficient baseline data, and set up processes to monitor changes, it should not make any additional decisions out of ignorance that may endanger the state wolf population, and violate its primary duties as a trustee.

III. Lessons Learned from History of WI Wolf Management

I have spent substantial time studying Wisconsin’s record of wolf management, and the science on which it has been based, and I have detailed much of this work in [Appendix 2](#). As DNR revises its Wolf Management Plan and sets up future hunts, it is crucial that it spend time reflecting on the errors that have been made in the past--both so it can correct the damage that has already been done to the state wolf population, and understand how to avoid those same mistakes going forward. My most urgent concerns relate to the state’s conduct of the unprecedented February 2021 wolf hunt, which had the following novel, and alarming, characteristics:

- **Timing.** The hunt was held during the last week in February, so it would overlap with wolf mating season. The state has never held such a hunt before.
- **Methods.** The February hunt allowed night-time hunting, pursuit by hounds in deep snow, and pursuit by snowmobile.
- **To my knowledge there has never been any peer-reviewed research about the effects of this combination of methods and timing of a hunt on a wolf population.**
- **Finally the NRB’s explicit desire to set a “conservative” quota for hunting Wisconsin’s wolves, suggests a different approach than was taken in the February 2021 hunt. As a scientist, I interpret conservative assumptions or conservative methods as those that are less likely to cause error.**

I recommend using the minimum bound of the most reliable and proven population estimate, and the upper bound of background non-harvest mortality. For the latter, I strongly recommend embracing the replicated findings that background mortality increases significantly when wolves are not federally listed, so as to avoid recommending quotas that will damage the wolf population quickly. I counsel against using ‘black box’ models that are not subjected to rigorous external evaluation and recommend any model be opposed against simpler alternative models. At every step of the process of producing and using science, transparency will support well-informed decisions. Other principles of scientific integrity such as independent review and reproducibility are similarly indispensable.

Likewise, transparency will be an asset for separating personal or agency values from the values of the broadest public, which should take much higher priority. To attain the goals of the broadest public, I recommend against any hunt or any hunting method that targets breeding adults, and recommend in general that the DNR focus on protecting the reproductive capacities of Wisconsin wolf packs when feasible. The most critical intervention for long-term sustainability of the state wolf population will be to enforce anti-poaching laws because illegal killing is the major cause of mortality. Failure to do so seems to favor escalations of wildlife crimes from low rates of overt poaching to high rates of cryptic poaching.

IV. Setting Realistic Goals for What Wolf Hunting Seasons Can Achieve

Finally, since 2005 and accelerating in 2016, my work has focused on evaluating two scientific claims made about hunting as a wildlife management tool. The first claim is that the public will tolerate controversial wildlife better if regulated killing is permitted. The second common claim is that illegal killing will diminish if legal killing is permitted. I present years of evidence from numerous independent sources that contradict both claims (Appendix 3). Furthermore, evidence shows that killing wolves to protect livestock more often backfires and creates additional conflicts. Lethal methods of limiting wolf predations on livestock have also been subject to less rigorous experimental tests than non-lethal methods, which are more likely to reduce such conflict. (Appendix 4).

V. Conclusion

I believe a public trustee should prioritize preserving Wisconsin's wolves for future generations as the highest priority, then secondarily regulating current uses, preventing and repairing unregulated, illegal, or undetected uses, and accounting transparently with the best available science to the broadest public. These duties apply to future wolf management planning and to the coming months before recommending any quota for a November 2021 wolf-hunt. However, I find most of the information needed is lacking to act as a responsible trustee and make prudent, science-based, transparent decisions about wolves.

Furthermore, my study of the history of wolf policy suggests such gaps in information are not new and the DNR has experienced many shortcomings in transparency and scientific integrity since 1999. The February 2021 wolf-hunt has created long-lasting uncertainty about the resiliency of wolves in our state and exposed the risks posed by hunting without deliberative, science-based decision-making.

What is needed now is deliberative, reasoned, pluralistic, precautionary policy guided by multiple sources of scientific evidence that have been tested by internationally recognized standards for strength of inference and reliability. I call for careful collection of the needed information by independent, diverse researchers who can and must be allowed to transparently share all information and discuss it before submitting their consensus -- after scientific debate insulated from undue political influence. I call for strict avoidance of the conditions preceding the February 2021 wolf-hunt. Finally, I call for abandoning long-held but erroneous assumptions that recreational hunting of wolves improves human tolerance, reduces poaching, or protects livestock.

Thanks for your attention to the four (4) Appendices attached with this comment.

To: Wisconsin DNR

Re: Harvest Committee Fall Hunt and Quota/Fall Wolf Season Comments

From: Kelli and Spiros Villis

June 16, 2021

The results of the spring DNR survey must be published and reviewed and discussed with all interested parties, including the public, prior to doing anything further regarding wolves or quotas.

The effect of the Feb. 2021 massacre on wolves in WI needs to be fully understood before establishing any rules or quotas for the future. This is difficult to do when bodies of killed wolves were not investigated.

Wolf killing increases predation, which we are seeing since the 2021 wolf massacre. Killing wolves does not serve any purpose.

The number of wolves killed just a couple of days in Feb. 2021 in WI exceeded the established quota by almost 100%. There should be no fall hunt. There should be no future hunts on wolves. What happened was irresponsible and unconscionable and has set back wolf recovery significantly. If for some reason there is a fall hunt, the quota must be zero.

Per law, once an animal is delisted, the states are required to have one hunting season on an animal per year. The wolf hunting season for 2021 is over and done. No more killing wolves this year. No more killing wolves at all. This law is irresponsible and does not allow for a sustainable wolf population as the wolf has bounced from Endangered to overhunted.

There is a conflict of interest with the DNR being funded by fees for hunting and trapping. Decisions regarding wolves must be made by independent parties not receiving funding, by the tribes, and by all interested WI residents, not a minority of hunters and out of state groups like Hunter Nation, Safari International, etc.

Of the 1400 comments received previously by the NRB, 93.1% of WI residents were against an early/emergency wolf hunt. 74% opposed wolf hunting altogether. The decisions regarding wolves must reflect these wishes.

Of the very recent study by an independent research firm per the request of the Wisconsin Humane Society, nearly two-thirds (62%) Wisconsin voters, across demographics and including farmers, hunters, all party affiliations, genders and jurisdictions, oppose the trophy hunting and trapping of wolves. Two-thirds (66%) oppose using packs of GPS radio-collared hounds to track and hunt wolves. The majority (68%) believe the February hunt killed excessive numbers of wolves.

With a significant number of radio collars being defunct, any data is suspect.

No wolves should be killed, especially wolves with radio collars. This is a waste of money.

With most tracking being done by people from cars, data is suspect as it is limited to areas with roads and may not reflect the general wolf population. The integrity of the data is only as good as the sampling.

There should be no night hunting. No use of night vision.

There should be no hounding. This is sanctioned dog fighting. Michael Vic was prosecuted for that so why do the states allow it? It is animal abuse to the hounds, the wolves and the bears.

Hounds should not be allowed to track and kill baby bears or any bear.

If there is a hunt, kills must be reported immediately. With today's technology there is no excuse for not doing this. Hunts must be shut down immediately once quotas are hit.

There should only be one tag per zone. When that zone closes, you are done.

Animals should not be killed, period. If you are going to allow killing of animals, you should not allow killing of animals that are not eaten.

Wolves should never be killed, but certainly pregnant wolves, lactating wolves and pups should never be killed.

Depredation is low, very low and ranchers/farmers are compensated. They must utilize all non-lethal forms of deterring wolves. Please see the Ted Turner Ranch film with Val Asher. Here is the link: <https://mountainjournal.org/how-ted-turner-gets-along-with-one-of-largest-wild-wolf-packs-on-earth>

On a more personal note:

I was born and lived in Wisconsin my entire life. I love animals. I love being out in nature. Ever since I was a child I had a special fondness of wolves, foxes and coyotes. I read about them. I drew pictures of them. I always wondered why they were vilified in stories and felt bad for them. I grew up in Milwaukee but spent many, many summer vacations in Peshtigo, WI, Marinette County. As an adult I vacationed (hiking, canoeing, fishing, photography) in places like Waupaca, Minocqua, and Hayward. I am not afraid of wildlife and recreate with hopes to observe wildlife, especially wolves. I am sad to say that as a middle-aged person who has lived in WI her entire life, I have never seen a wolf in the wild, nor have I ever heard one howl in the wild. My experiences with wolves have sadly been limited to trips to the zoo or wildlife sanctuaries, photography books, the internet, and factual books about wolves. I am currently viewing the DNR tracking module courses to better be able to identify places where wolves have been. I am not sure if I will become a tracker. There may not be any wolves left to track. I also question if I would be contributing to a wolf's death by reporting where it had been. The closest pack to where I live was just eliminated. This was the Bog Pack near the WI Dells that had 9 wolves. 7 wolves from this pack were killed in the Feb. 2021 wolf massacre, and the other remaining 2 ended up going for easy prey due to the loss of their pack and subsequent inability to hunt their normal prey, and were killed for depredation. The entire pack was killed by humans. This has greatly saddened me because this was my closest chance to have a wolf experience. I feel that wolves are misunderstood, and my heritage of having wolves in my state for me to experience is being stolen from me just as life is being stolen from the wolves here. The wolves have survived the last Ice Age but they are not going to be able to survive man. I hope I get the chance to see and hear wolves in the wild, and maybe even be able to photograph them. It doesn't seem like that dream is ever going to happen. It is going to take the wolf population a long, long time to recover from what just happened to them, if they aren't extirpated first. I pray for the wolves and wildlife every day, and for leaders that will protect this natural resource for future generations. The way things are being handled now is not sustainable for the wolf population.

Mr. & Mrs. Willis
W238 S4979 Big Bend Road
Waukesha, WI 53189
262-825-2530

May 10, 2021

Randy Johnson
Wisconsin DNR

Dear Randy,

My husband and I are writing to you to supplement our answers to the Wisconsin Wolf Management Public Input Questionnaire as you have told us we could do.

- We oppose any killing of wolves at all unless a wolf is proven to have Rabies.
- We feel that the WCC and NRB board membership requirements need to be reformed so that the board better represents the interests of all of WI residents.
- The decisions made by the DNR, NRB and WCC need to be guided strongly by input from biologists. (it is too hunter-biased)
- We oppose the use of hounds to track and/or kill wolves and bear.
- We oppose compensating hunters for injuries or death that happens as a result of these hunts using hounds.
- We feel hounding is abuse to both the hounds and the wolves and bears.
- No animal should be hunted during the period of time when females are pregnant or lactating.
- Violators to rules must be held accountable.
- Trespassers must be charged and prosecuted.
- We object to the snaring, trapping, poisoning, baiting, hounding of any animal and the use of prerecorded wolf calls or prey distress calls.
- We specifically choose to recreate in WI in areas where we are away from people and have the opportunity to see and/or hear wolves.
- We are not afraid of wolves.
- We believe that wolves are beneficial to the forests and ecosystem.
- We believe that wolves keep deer and all ungulate herds healthy by killing diseased and elderly animals, and protect forests by keeping the deer moving to prevent over-grazing.
- Wolves, coyotes and foxes are essential to keeping rodent populations in check.
- We believe that nature will balance itself and that humans need to stop interfering.
- We will vote solely based on issues involving animal welfare and the environment.
- We oppose any hunting at all, but especially night hunting of animals and hunting on public lands.
- Wolves need to have safe areas and safe corridors to live and move in.
- We oppose any hunting of any sort on public land.
- We believe that ranchers and farmers need to take more responsibility by using non-lethal means to protect their farm animals like rows of electric fencing, and the use of very specific breeds of dogs and hybrids to patrol and deter wolf predation.
- We oppose anyone killing any animal with a radio collar.
- We oppose the use of GPS to track and kill animals.
- We oppose any aerial killing of animals.

- We oppose a wolf hunt at all, but if there is one, each tag must be restricted to one zone, and when that zone closes, the permit is void.
- All wolf kills must be documented and verified.
- There must be immediate closing of the hunt once the quota is met. With today's technology there is no reason this requires a 24 hour notice.
- The ratio of hunters to wolves must be much lower than it was in 2/21, again we oppose any hunt at all.
- Pups must not be killed at all. Ever.
- The word "harvest" is offensive and should not be used relative to wolves and animals. They are not crops. They are not even food to hunters who kill them.
- We must stop placing value on animals based on what they can do for us. They should be entitled to live their lives in peace, independent of human opinions.
- Out of state groups should not be allowed to influence any hunts in WI. i.e. Hunter Nation, Safari International, etc.
- Baiting should be outlawed, but if it is not, chocolate and xylitol must not be used as bait.
- Fences must not be used in hunting to trap animals.
- No animal should be run down by snowmobiles, or any vehicles.
- We do not hunt, but we do enjoy the outdoors in WI so we do things like canoeing, hiking, photography of wildlife, camping, lodging, snowshoeing, bicycling and we feel that our interests are not being represented. Only 4% of WI residents actually hunt, yet the criteria to be on the NRB is highly biased toward hunters.
- We care about future generations having the opportunity to see and hear wolves.
- We care about the Indian people and their reverence to the wolf.
- We oppose the use of recorded wolf calls and man-made wolf calls to trick wolves.
- We oppose the hunting, killing, trapping, poisoning, snaring, baiting and hounding of wolves on both public and private land.
- Wildlife management and wolf populations should not be legislated. Biologists must be the leaders on this.
- All wildlife killing contests must be banned.
- There was not enough data on wolf population in WI before the wolf massacre in 2/21, and there is insufficient data now, yet the state is planning another hunt for this fall. Most of the public does not approve of killing wolves. Where is the science? Where is the democracy?

Thank you,

Kelli Villis and Spiros Villis

To: WI DNR Fall Wolf Harvest Committee

From: Kelli Villis

6-17-21

Re: Comments for 2021 Fall Wolf Harvest

Attn: DNR Fall Wolf Harvest Committee

Yesterday I submitted comments for the upcoming meeting. Since then I was fortunate to catch a talk by Professor Tim Van Deelen that was on Virtual Badger Talk and was called "Impacts of Wolf Predation on Wisconsin's Deer Herd." His talk was excellent and I encourage all of you to watch it before making any further decisions about wolves. It is very enlightening.

"Tim Van Deelen will review a bit of the history of this topic, its scientific context, and will review recent telemetry research and recent population modeling that attempt to quantify the effects of wolves on Wisconsin deer populations relative to the impacts of hunting and the impacts of other predators."

The take away from this was that wolves and black bear have a minimal impact on deer populations in WI, that depredation on livestock in WI is a manageable issue, wolves help reduce deer-auto collisions, help with plant diversity, there are not less deer to hunt, the deer have moved to less core wolf areas, that humans hunting and chronic wasting disease have the largest negative impact on the deer population, that wolves change the behavior of the deer and not significantly the quantity, 24-32% of WI wolf packs lost reproduction due to the Feb. 2021 massacre, and that **the goal should not be a "number" or "quota" but instead, sustainability of the wolf population which they will do all by themselves.** Wolves will only produce as many young as the environment can sustain. **The goal needs to be sustainability, human tolerance, and managing any negative effects (non-lethal forms of deterring wolves from livestock).** These are my new additional recommendations to your committee.

<https://www.facebook.com/markesanlibrary>

The wolf population will manage itself.

No target quota, just manage effects instead of managing population.

Get CWD under control.

Coexist.

Thank you,

Kelli Villis



National Wolfwatcher Coalition
Great Lakes Region
PO Box 102
Ewen, MI 49925
(906) 988 2892
<http://wolfwatcher.org>

June 15, 2021

The National Wolfwatcher Coalition is an all-volunteer, nonprofit organization dedicated to promoting positive attitudes about wolves through education. Nationwide, we have nearly 800,000 supporters, representing not only Wisconsin residents but others who recreate in the state and purchase Wisconsin products

2011 Wisconsin Act 169 states “**(5) SEASONS; ZONES.** (a) The department shall establish a *single annual* (emphasis added) open season for both hunting and trapping wolves that begins on October 15th of each year and ends on the last day of February of the following year.”

Webster defines single as “one” and “annual” as “covering the period of a year” and “occurring once a year”. Since Wisconsin already held a wolf hunt during 2021, a fall hunt is not required or justified.

Recognizing that DNR plans to proceed with the hunt despite no legal requirement please consider my comments on behalf of the thousands of Wisconsin wolf supporters I represent:

- All wildlife, including wolves, are publicly owned and are entrusted to the state to be managed on behalf of the public and are to be safeguarded for the public’s long-term benefit. The notion that wildlife is a public resource, managed for the common good, and held in custodianship by a cadre of trained professionals who serve as trustees (Brulle 2000) and are held accountable by the beneficiaries, the public.
- Holding a fall wolf hunt violates this public trust. A recent poll showed Nearly two-thirds (62%) Wisconsin voters, across demographics and including farmers, hunters, all party affiliations, genders and jurisdictions, oppose the trophy hunting and trapping of wolves.

- Two-thirds (66%) oppose using packs of GPS radio-collared hounds to track and hunt wolves.
- The majority (68%) believe the February hunt killed excessive numbers of wolves.
- It is very upsetting that the time to submit public comments was shortened by two days. Further, the February hunt proceeded without meaningful public input. This, I believe is another violation of the Public Trust Doctrine as public input into decision making processes help assure trustee (DNR) understanding of and responsiveness to the public's needs.
- Wildlife conservationists, scientists and researchers confirm there is no scientific reason to hunt/trap wolves for recreational purposes. Wolves provide ecological benefits and self-regulate their populations.
- The February hunt took place during peak wolf breeding season. We do not know the full impact of the hunt on packs, pup survival or the population as a whole. Estimates vary but we may have lost 30% or more of the population and it could take years to rebound. We need a reliable population estimate before any hunts take place.
- The often quoted 350 figure was never intended to be a population cap.

If the decision is made that an unscientific fall wolf hunt will take place, then a zero quota must be established in areas of prime wolf habitat including the Central Forest and our national and state forests.

Nancy Warren
Executive Director
National Wolfwatcher Coalition

science confirms there is no need for a cull to control wolf populations. Moreover, no economic justification exists for hunting wolves. In fact, economic considerations, including the high cost of implementing an annual season and the economic harm to more lucrative wildlife-watching tourism trade, counsel against hunting and trapping seasons. Wolf hunting and trapping seasons also serve little-to-no livestock predation control purpose. On the other hand, wolf hunting and trapping seasons threaten wolves' long-term recovery through increased **poaching** and **additive mortality**. This arbitrary wolf killing interrupts the necessary multi-generational social structure of wolf packs, compromises pup survival, and limits wolf dispersal.

The public is the beneficiary of the trust for whom assets are managed. Trustee accountability for those assets is necessary for the PTD to be effective, and will be best served with an informed and engaged public. Public input into decisionmaking processes will help assure trustee understanding of and responsiveness to contemporary needs, as well as public understanding of competing demands on trust resources. Courts in California, Connecticut, Indiana, and Minnesota have explicitly granted the public legal standing under the PTD, albeit without explicitly referencing wildlife resources. (Case law that addresses wildlife in the context of the PTD are summarized beginning on page 21.)

May 3, 2021

To Whom it May Concern at Wisconsin DNR:

My name is Amy Mueller, and I am Board Member for Friends of the Wisconsin Wolf and Wildlife group.

I have lived in Wisconsin for my entire life. In my fourth-grade class at Dousman Elementary, I learned about how the wolf had been trapped and poisoned to extinction in Wisconsin. However, there was rumor a few lost wolves might have wandered down from Minnesota. Our entire class raised funds to help save and protect these wolves. Even as a nine-year-old, I understood the importance of protecting this amazing, and often wrongly vilified creature.

The real villains in this story are NOT the wolves, but the special interest hound and trophy hunters and their connections in government.

I stood up for the gray wolf as a fourth grader and sadly am still having to do it today, so they are not killed and trapped to near extinction in our state again in 2021.

Wisconsin is the state where some of the world's most forward-thinking conservationists were born and lived, including John Muir and Aldo Leopold. Yet, there are few opportunities for the "non-consumptive" advocate voices to be heard by our own DNR regarding our relationship with wildlife because the hunting and trapping organizations have such influence on the agency. I am hoping this letter can help shift perspectives for the upcoming November wolf hunt.

CALL TO ACTION: All future hunting plans for next year should be put on hold until that NEW plan is complete. **Set a zero quota for Fall 2021, unless you can provide a science-based rationale as to why another recreational wolf hunt that only increases depredations for our Wisconsin Farmers is required in our state.**

Here are my top 10 reasons to support this viewpoint, that I hope you will consider:

1. **The existing wolf population is NOT known.** Due to the time of the hunt in February, tracking data pulled in prior to the hunt is now void. I spoke with Randy Johnson from WDNR in March – and his words were “we are in uncharted territory now in WI.”
2. As recently revealed to the Wolf Harvest Committee, the DNR is trying to quickly shift to a new occupancy model, to guess the current wolf population. However, one large component is based largely on monitored wolves. **How can you reasonably implement this new model with any degree of confidence with 16 functioning collared individuals in the entire state of Wisconsin?** This number is substantially lower than previous years, with seven collared wolves killed in February.
3. **Also, how does an occupancy model widely used out west in Montana with large uninhabited areas really work in our state?** Montana has a total state

population of 1,085,000 people and a low population density of only 7 people per mile. One of the lowest in the United States. **Wisconsin has roughly 4.7 million MORE people than Montana** and a population per square mile of 89 people – over 12 times that of Montana. Given the enormous differences in population, development density and available habitat in our state, shouldn't this model be run against another winter minimum count to verify accuracy?

4. **What is the ripple effect this year and in future years on the population caused by going over the set quotas BY NEARLY DOUBLE in February?** Wolf pack structures were broken. This hunt interfered with reproduction DURING MATING SEASON for the first time in state history. How many, pups and adults will survive the coming months, even if they were not one of the 218 wolves killed?
5. As previously confirmed, 38 adult females were killed. Undoubtedly, pregnant females killed. How many? We will never know. According to Wisconsin's Green Fire report, "The February 2021 Wisconsin Wolf Hunt: A Preliminary Assessment" published April 27, 2021, it states, "Based on loss of bred females and alpha males, **it is reasonable to estimate that 60-100 of Wisconsin's wolf packs may lose all pup production due to the February hunt.**"
6. How has this impacted predatory habits on livestock? Weaker packs and wolves are known to do this. This was a clearly communicated concern by many biologists before the February wolf hunt. The full impact is still to be understood. What we do know is that since the February wolf hunt, the confirmed number of farm depredations are more than double compared to last year using DNR data. We will see what the total numbers are in the coming months as remaining wolves become more desperate to survive. **Recreational wolf hunts create more of a problem for our Wisconsin farmers.**
7. Further to the livestock concerns with wolves, one of the most prominent arguments I have found is to protect livestock. However, in recent studies **less than 1% of livestock deaths have anything to do with wolves.** There is greater risk of losing livestock to respiratory illness, birth complications, digestive issues, weather, or other diseases. Furthermore, much of the evidence points to a growing trend of chronic farms not changing their approach and seeking only to collect money from the WDNR. The Wisconsin recreational hunt does not address the farmer's issues. Many of the wolves slaughtered during the February hunt came from our National Forests and parks and were nowhere near a farm or permanent residence.
8. **Only two months ago; 99 additional wolves killed ABOVE QUOTA-** exceeding the DNR quota by 81.5%. Given that, that extreme overage, that is

already essentially a wolf hunt on top of what was planned for in February. It was a DOUBLE hunt in all in one.

9. Beyond the numbers, another concerning topic is honoring treaty, land, and heritage rights of Native tribes. During the April Wolf Harvest Committee meeting, a hunting enthusiast tried to spin the numbers by stating the wolf kill numbers of about 200 wolves was the desired the DNR quota. **Not acknowledging the fact that Native tribes decided to not hunt their part of the quota is a blatant disregard for these people and their rights.** With the tribes not hunting, the quota managed to by the DNR was 119 wolves. Sadly, 218 wolves were reported killed. These are the facts. **Native Tribes rights should not be dismissed to lessen the brutal facts of the February hunt.**

10. Another reason often used to spur an un-needed hunt is the loss of a population of certain species such as deer or elk. Contrary to what hunting extremists say, science has overwhelmingly proven that Wolves prey and the weak and enfeebled. This leaves stronger and healthier herds or groups, with less competition for resources. **As apex predators, the wolves help to control the spread of CWD in the deer population and improve forest health and biodiversity.**

Bottom line: We are all lucky to live in a state where we have the chance to hear a wolf howl – quite literally the “call of the wild”. Few states in our country, and few places on earth, have such a rare and unique opportunity.

In fact, the very hope of just hearing a wolf howl in my home state would be an experience of a LIFETIME for me. In hopes of fulfilling this dream, my family frequently travels to a small family resort outside of Park Falls to view the wildlife and hike in the Chequamegon-Nicolet National Forest. This year, we have two trips to Bayfield County in hopes of hearing a wolf. A hope that is much smaller following the February wolf slaughter in that area.

The wildness of “wolf country” belongs to **all** our Wisconsin residents and is a right of future generations. It is a gift we need to protect. We should carefully understand our next steps before we rush another wolf hunt in the same year, that could possibly bring the wolf to the brink of extinction, yet again in Wisconsin.

Please set the wolf quota to zero for November.

Thank you for your consideration.

Amy Mueller
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