



WI Draft WMP Talking Points

What we like:

We appreciate the efforts of all WDNR staff involved in updating the state's wolf management plan. Although we believe the current plan needs significant updating (see next section), we recognize the efforts and improvements made to the previous plan, including:

- Wolves in WI will no longer be managed by reference to the old numerical goal of 350 wolves.
- There is much greater recognition of the ecological role of wolves
- The inclusion of a social survey, which notes increased positive views of wolves, knowledge of their ecological roles and increased opposition to the motives and methods for killing wolves
- The adoption of proposed buffer zones around tribal reservations (i.e., previously no buffer zones existed)

What we don't like:

- The current draft does not reflect the best available science, and is missing a substantial amount of scientific literature on (see reference list below):
 - wolf ethology, sentience, sapience, sociability, agency and wellbeing
 - effectiveness of non-lethal interventions, especially relative to lethal ones
 - the impact of widespread killing on wolves' physiology, behavior, wellbeing, social dynamics, [ecological relationships and evolution](#)
- The above scientific omissions, combined with the emphasis on and promotion of sustainable recreational killing and consumptive users as a main management strategy, results in a biased plan that runs contrary to scientific evidence despite much of this omitted scientific evidence being more recent, numerous and of stronger inference.
- The plan should strictly curtail any lethal management of wolves except in extremely rare circumstances of immediate defense of life.
 - A substantial body of research documenting human-caused mortality in North American wolves, including [Wisconsin wolves](#), has found that policies allowing liberalized killing of wolves result in a direct increase in the hazard and incidence of illegal killings.

- Hounding or hound training, which are akin to allowing legalized dogfighting, should be illegal or severely restricted as this practice is extremely cruel to wolves and hounds alike and is not supported by the majority of hunters or the broad public.
- The plan should prioritize wolf protections and concentrate solely on non-lethal management of wolves in response to livestock conflicts to ensure ethical coexistence.
 - Despite [Act 169](#), which mandates a wolf hunting season, the department can still restrict the implementation of lethal methods by setting minimal quotas, including a quota of ‘0’ wolves, restricting timing and methods.
 - [Several studies](#) have proven a proactive non-lethal approach leads to better conflict mitigation.
 - Lethal management often fails to provide a long-term solution to wolf predation and has the [least consistent success rates](#) when compared to non-lethal practices. In addition, there is significant evidence showing that [lethal wolf management may be less functionally effective at mitigating subsequent livestock losses than non-lethal deterrents](#).
- The plan should *require* the implementation of abatement measures as well as the use of non-lethal conflict minimization techniques by domestic animal owners for the latter to receive compensation for confirmed predation.
- The plan also runs contrary to [public values towards wolves](#) (and omits mention of such majority values from the plan), despite department surveys evidencing that the broad public cares about wolves as individuals (and not just for the viability of the population). Given the recent liberalization of killing wolves by the state, it would be incredibly informative to note majority support of the following reasons for opposing a regulated wolf hunting/trapping season (which are all omitted from the plan): opposition to specific methods of harvest like hounds (64%) or traps (70%), feelings that hunting wolves is unnecessary (62%) or culturally offensive to Native American tribes (57%).
 - All such reasons convey majority disagreement with practices currently promoted and endorsed by the legislature and the WDNR, and such a conflict between managers and the public should not only be acknowledged, but foregrounded and carefully considered in policy (instead of dismissed).
 - Such decisions to omit literature or downplay evidence (e.g., such as majority opposition to killing wolves and their reasons) are contrary to principles of scientific integrity (e.g., present all relevant scientific evidence to the public) as well as ethics (e.g., disguising ethical decisions, such as recreational wolf killing, as robustly supported by science).
- Conflicting agency objectives (e.g., optimizing public hunting and conflict mitigation) are not only not acknowledged, but even misunderstood as harmonious, against the body of scientific evidence. That culminates in the prioritization of consumptive values and policies; e.g., according to the body of scientific literature, use of lethal methods, and

especially public hunts, are contrary to most objectives relevant to: harm mitigation, the wellbeing of wolves, their ecological roles, and their non-exploitative enjoyment (i.e., Objectives A, B, D and F).

- There is a stark [lack of consideration for individual wolves](#), wolf population health (including wellbeing), and measurable indicators for assessing any harms barring disease prevalence (e.g., [accounting for cortisol levels or other stress hormones](#), [measures of pair/pack persistence](#))
- There is an [inappropriate understanding and consideration of tribal worldviews about wolves](#). Tribal worldviews of wolves are misconstrued as ‘cultural benefits’ tribes receive from the existence of a wolf population, when in fact tribal worldviews consider *each individual wolf as a person and relative*. Cultural respect and sensitivity towards such views, shared by many non-tribal members, demand the strict mitigation of lethal measures, especially recreational killing, as opposed to their current promotion in the plan.
- In general, all omissions of scientific literature, the arbitrary prioritization of policy objectives, the rhetoric of the plan and the dismissal of public values and concerns *for wolves* point towards a biased, unscientific and instrumental view of wolves that promotes values contrary to broad public perspectives on wolves.
- ‘SOM’ wolf estimation methodology – From a recent [critique](#): “The new methods sacrifice precision, but are believed to retain adequate accuracy and sensitivity to changing conditions for reliable decision-making. We review evidence for the accuracy, precision, and sensitivity of the new ‘scaled occupancy model’ (SOM) applied in Wisconsin. We conclude that the Wisconsin method would systematically overestimate wolf abundance by large (but currently incalculable) margins. Because Wisconsin, similar to other states, not only changed to unverified methods but also implemented widespread wolf killing, shortcomings in their estimates of wolf abundance may have far-reaching consequences for population viability and confidence in state wildlife managers. We discuss findings from Wisconsin alongside similar findings for other states’ occupancy models being insensitive to human causes of mortality that have recently increased. Overall, Wisconsin’s proposed method for estimating wolf abundance shows significant departures from best practices in scientific measurement. Verification will require independent replication and unbiased tests at multiple scales in multiple habitats under different human-induced mortality rates, and peer review before the new methods are considered reliable.” (Treves & Santiago-Ávila, 2023)

Rating: 4-5

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