

I'm writing in opposition to an early wolf-hunt because of the harm it will do to Wisconsin's wolf packs through illegal take that threatens the long-term security of the state wolf population.

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

The scientific landscape has changed.

Three independent lines of evidence confirm that permitted killing of wolves by itself leads to intolerant attitudes and actions. Among the actions we expect to see following the delisting is an increased rate of illegal wolf-killing. We expect the rate to accelerate the longer wolves are left without federal protections and liberalized killing is allowed through state-run seasons. The death toll for wolves will exceed legal wolf-killing. Cryptic poaching plus legal wolf-killing are likely to become unsustainable quickly. The sum of human-caused mortality will threaten the security of the state wolf population, which in turn might prompt relisting under the federal ESA.

Preventing illegal killing of wolves would require more strict and effective law enforcement than ever before implemented by wolf managers. There is no time for the education of the hunters, the non-hunting public, and law enforcement, which makes the proposed February wolf-hunt a rash and dangerous proposal.

Despite state or tribal protections for wolves, the lifting of federal ESA protections led to illegal take in the past. Scientists in my lab predict it will happen again. With the delisting announcement, the federal government's policy signal to would-be poachers has been sent. That signal has led in the past to 'shoot, shovel, and shut up' behavior (cryptic poaching), which entails destruction of evidence and theft of taxpayer property in the form of radio-collars, in addition to loss of wolf lives, which is a public trust asset belonging to the broad public, current and future, not to poachers or the tiny segment of the state population that wants to kill wolves.

The best available science on preventing wolf predation on livestock comes from Michigan's lethal control program. Lethal management raised the risk for livestock, it did not lower it.

The best available science shows tolerance for wolves declines when the government liberalized wolf-killing, especially among male residents of wolf range with hunting experience.

The best available science shows population growth slows and poaching rises. Poaching is a crime.

The best available science shows blood does not buy goodwill.

The Wisconsin wolf management plan of 1999 amended in 2007 contains scientific errors that should be addressed and corrected if the state wants the plan to represent the best available science. It also contains implicit value judgments that should be clearly separated from the science. Those value judgments no longer represent the majority of the state's residents.

The proposal to hunt wolves, at all, let alone in February, is a narrow minority which will anger the state majority. Research on nationwide wildlife values by Colorado State University showed that a random sample of Wisconsin residents found more mutualists "wildlife are part of one's social network and worthy of care and compassion" than active hunters (29% v 17%) and only a minority of respondents approved "Wolves that kill livestock should be lethally removed". The state is pushing a narrow minority view against the will of the people. Beware of the consequences because they threaten the independence of the Natural Resource board and the Department.

Finally, the US Fish & Wildlife Service (USFWS) and the Wisconsin DNR continue to rely on debunked science even after they have been provided with better, up-to-date factual information from top journals and the most rigorous, recent scientific evidence. I explained this in my official peer review in 2019 requested by the USFWS [https://www.fws.gov/endangered/esa-library/pdf/Final%20Gray%20Wolf%20Peer%20Review%20Summary%20Report\\_053119.pdf](https://www.fws.gov/endangered/esa-library/pdf/Final%20Gray%20Wolf%20Peer%20Review%20Summary%20Report_053119.pdf).

I also shared these newer, stronger scientific data with the White House Office of Management and Budget on 29 September 2020 and replied to the USFWS after seeing them cite outdated and inaccurate science on 14 December 2020. In sum, the state legislature should demand an update of the state wolf plan using best available science only.

In conclusion, state wolf-hunting policies will cost the lives of livestock and wolves, increase environmental crimes, turn the majority against the wildlife managers, and flout the best available science.