

MEMO

DATE: 17 December 2020

TO:

Mike Wiggins, Chairman, Bad River Tribe of Lake Superior Chippewa
Naomi Tillison, Director, Bad River Natural Resources Department
Peter David, Great lakes Indian Fish & Wildlife Commission
Josh Kaul, Attorney General, State of Wisconsin (cc: Chris McKinney, Director
Government Affairs)
Noah Roberts, Governor's office, State of Wisconsin
Wenona Wolf, Lt. Governor's office, State of Wisconsin

FROM: Adrian Treves, PhD, Professor of Environmental Studies, University of
Wisconsin-Madison

RE: Concerns about illegal wolf-killing and destruction of evidence January 2021

Good afternoon

I'm writing in regard to wolf delisting and the likely consequences it will have on Wisconsin's wolf packs beginning now or in January at the latest.

Just this year new scientific results have been released which could prove noteworthy for groups that value wolves alive. While I understand that moral or cultural values at times lead action, I also believe the most up-to-date science must be considered by governments committed to public trust principles or obligated to follow the best available science when designing policy.

The scientific landscape has changed.

1. Three independent lines of evidence confirm that delisting wolves by itself leads to intolerant attitudes 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 by government control.
2. Independent of 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 - as soon as the rule goes into effect this January, if not earlier. 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 entail destruction of evidence and theft of taxpayer property in the form of radio-collars.

3. The Wisconsin wolf management plan of 1999 amended in 2007 contains scientific errors that should be addressed and corrected if the state wants the plan to represent the best available science. It also contains implicit value judgments that should be clearly separated from the science.
4. Finally, the US Fish & Wildlife Service and the Wisconsin DNR continue to rely on debunked science even after they've been provided with lengthy and robust factual information from my official peer review in 2019 - which was requested by the service. I also shared this with the White House Office of Management and Budget on 29 September 2020.

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

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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.