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Patricia Randolph's Madravenspeak: Our last chance to stand up for wolves ends July 15

By Patricia Randolph | state columnist 6 hrs ago



NPS Photo / Ken Conger

“I find the proposed rule (and draft biological report next) are unscientific on their face.” — Dr. Adrian Treves' peer review of the U.S. Fish and Wildlife Service proposal to de-list gray wolves

In March, The U.S. Fish and Wildlife Service proposed de-listing gray wolves from Endangered Species Act protection in all lower 48 states. The public comment period ends Monday.

Dr. Adrian Treves, who founded the Carnivore Coexistence Lab at UW's Nelson Institute, served as one of five official peer reviewers for the proposed de-listing and draft biological report. Read his report [here](#).

Treves spoke of his findings on Wisconsin Public Radio on July 9.

In his review, Treves stated: “The problem is that the draft biological report was released simultaneous with the proposed rule for the peer review. Logically, the draft biological report which should stick to scientific evidence and scientific inference should be peer reviewed long before a political and legal decision about delisting is made.”

“The nature of a base of evidence is that it is solid before one builds on it. In other words, the evidence should inform the value judgments that underpin a political and legal decision. Without the sequence I recommend, the proposed rule looks like a predetermined conclusion,” he wrote.

On WPR, Treves said he found serious gaps in the science, apparently preferred, to lead to the preconceived conclusion of de-listing.

A key question posed by the USFWS was whether Wisconsin, Minnesota, and Michigan management plans were likely to maintain a viable wolf population into the future. Treves replied, “No. In the review that follows, I detail the many sources of evidence that are missing to draw such conclusions and the many contrary findings that seem to have been overlooked, which undermine the conclusions.”

Treves pointed out that before de-listing, it is required that a species be recovered “in a significant portion of its range.” He explains why “significant” would not be less than half. Since wolves are on less than 15% of their range and large areas of suitable wolf habitat are vacant, the recovery does not meet ESA requirements.

One of the arguments for having wolves hunted was that it would release pent-up wolf hatred, frustrating the poor trophy hunters — but legalized killing entitled increased poaching. Illegal wolf killing is rarely reported, investigated or prosecuted.

Treves, in his review: “The USFWS could treat illegal (wolf) killing as predation and control it, rather than redefine it as an immutable factor in habitats.”

A caller on WPR, Jack, asked how many deer wolves take in Wisconsin. Treves responded that at the height of wolf populations, 25,000 deer, but that twice that many are killed on roads, and more than 10 times that many deer are killed by hunters.

Treves spoke of the vast difference between the portrayal of public will and the 42 beef cattle ranchers he personally interviewed. Only one wanted wolves eradicated. Forty-one others did not want wolves killed.

He found that Minnesota and Wisconsin wolf counts cannot be verified and could be dramatically lower.

Less than 1% of farms in Wisconsin are affected by wolves — and according to the Department of Agriculture, two-tenths of 1% of livestock deaths before the slaughterhouse may be caused by wolves. Three times that many are killed by domestic dogs. Ninety percent of livestock pre-slaughter mortality is due to poor care. Why not focus on respiratory illness causing 140 times more death than wolves?

Studies by the Carnivore Coexistence Lab show that killing wolves is counterproductive, causing disruption of wolf packs and sometimes resulting in spillover livestock losses at neighboring farms. Proactive humane defensive measures are more effective.

The extreme deadly bias of state agencies is exposed clearly in the 1992 Minnesota management plan proposing killing all 450 wolves living in zone B: “At the extreme, wolves could be eliminated from Zone B (USFWS 1992, p. 20)... because the area is not suitable for wolves.” Treves pointed out that “an area containing 450 wolves is suitable by its own definition” and “that it is rather a value judgement of not wanting wolves in that particular suitable habitat.”

Most humans do not kill wolves and most citizens do not want our wolves killed.

The main cause of wolf mortality is illegal killing. Treves found that state and federal agencies “under-estimated illegal killing by large margins”. “Treves et al. (2017a) calculated that poaching exceeds legal wolf-killing when wolves are federally protected (and often 2 to 3 times higher).” Studies show “the inclination to poach wolves actually increases after delisting and during periods of liberalized wolf-killing.”

“Furthermore, a majority of radio-collared wolves in at least one state (Wisconsin) went missing, fate unknown.”

Treves warned that killing contests, popular across the country and in Wisconsin, could be promoted to destroy wolves.

The colonization of North American was a history of genocide: “All three of these — Indian, buffalo and the wolf were doomed to be brought almost to the point of extinction by 'civilization.'” The mass murder of wolves really accelerated the last half of the 1800s. It is estimated that 1-2 million wolves were killed, suffering greatly, often by strychnine placed in the carcasses of buffalo, sheep and cattle.

The government has been in the business of killing wolves and our wildlife since the very beginning. It is accustomed to rationalizing killing millions of wildlife annually, directly through federal Wildlife Services, destroying our public lands to facilitate cheap destructive grazing for ranchers.

To put this into perspective, 56 billion farmed land animals are killed in the United States annually for human consumption. The USFWS wants to legalize killing the 5,500 wolves that are a tiny remnant of fast dwindling wildlife during an unprecedented mass extinction.

Are humans the only predator on earth allowed to eat? To exist?

Action Alert:

Killing wolves to protect livestock, unlucky victims themselves, slaughtered for money for the few. Cheap grazing destroying public lands. We are killing off the wild to kill the billions hoarded for killing. What insanity. Please comment through end of day, July 15: <https://www.regulations.gov/comment?D=FWS-HQ-ES-2018-0097-0001>

"Killing Games: Wildlife Caught in the Crosshairs" will be screening July 24 at 7 p.m. at the Landmark's Edina Cinema in Edina, Minnesota. Project Coyote documentary showing the hidden persecution and killing of natural predators — the most killed, the fastest, for prizes. Click [here](#) to purchase tickets. Be inspired to help wildlife.

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