



October 19th, 2023

Members of the Wisconsin Natural Resources Board
PO Box 7921
Madison, WI 53707-7921

RE: NRB Action Item 5F – Wisconsin Wolf Management Plan

Chair Smith and members of the Natural Resources Board,

My name is Fred Clark. I am the Executive Director of Wisconsin's Green Fire, a statewide organization dedicated to science in natural resources conservation.

First, for those of you who are new to the Natural Resources Board, congratulations on your appointment. The expertise you will bring and the leadership you will provide for this important state agency is very much needed. Please know that the great majority of Wisconsin residents appreciate and applaud your commitment to public service.

I'm speaking today, on behalf of Wisconsin's Green Fire and our members, in favor of the 2023 Wisconsin Wolf Management Plan. Members of Wisconsin's Green Fire Wildlife Work Group include some of Wisconsin's most experienced wolf biologists, including people who were involved in developing the 1999 Wolf Plan.

In support of the plan let me make the following observations:

Wisconsin's Green Fire commends the department for developing a sound science-based, socially responsible, and culturally sensitive conservation plan for gray wolves in Wisconsin.

- We support the department's focus on ecological benefits of wolves, balancing a recovered population of wolves with the need to reduce and manage potential conflicts and cultural concerns, while using an adaptive management approach.
- We support the new plan's configuration of zones and subzones for managing wolves, especially designing subzones around Wisconsin tribals lands and reservations to better protect wolf packs living on reservations.

- We support a shorter 8-hour window for reporting wolf harvests.
- We support restricting dog training on wolves only during the period when specific zones are open to wolf hunting with dogs.
- We support use of subzones to provide greater control on the wolf populations in areas with concentrated depredations on livestock and pets.
- We support continued efforts by the department to educate people about wolves and how to live with wolves.
- We support the department's efforts to use trained citizen scientists to help estimate wolf abundance and teach others about wolves.

Let's talk about the elephant in the room. The number 350 seems to have become a battle cry for those wanting to see a dramatically smaller wolf population.

Wisconsin's Green Fire, whose members include biologists who were part of developing the 1999 wolf plan, published a paper, [The 350 Wolf Goal in Wisconsin](#), unpacking the significance and incorrect assumptions surrounding the now 24 year old 350 management goal.

Although the heated argument about what the 350 number was supposed to mean in 1999 seems to never end, who was right about what those words meant 24 years ago is really irrelevant – it is wholly inappropriate and outdated as a management framework today.

Scientific understanding of wolf carrying capacity and suitable habitat have changed dramatically and the limited data that was the basis for setting the 1999 goal is no longer appropriate.

This new plan's reliance on goal setting as an adaptive, location specific process, rather than relying on a fixed, statewide population target is appropriate – just as we do with other wildlife species.

Establishing metrics focused on the health of wolf populations, prey populations, ecological benefits, social benefits, and levels of conflicts provides better means for annual management decisions than an extremely low fixed statewide population goal.

It's important to note that wolf depredation on livestock has mostly declined or stabilized since 2010 when wolf populations were well above 350. We know from experience that wolf depredation is more effectively managed by intense localized controls than population goals across the state.

Wolf depredations on hunting dogs has also fluctuated but has not changed significantly since there were 300–400 wolves in Wisconsin, despite our current population which is closer to 1000 wolves.

One goal all stakeholders on this issue may agree on is a shared goal of reducing human wolf conflicts, including reducing loss of livestock to wolves, and reducing unnecessary loss of hunting dogs. By redesigning wolf management zones and sub-zones, the new Wolf Management Plan will allow better targeting of hunting activities in areas where human wolf conflicts have been high.

We need to recognize however that hunting alone will never be a complete solution to reducing human/wolf conflicts.

The plan appropriately includes significant emphasis on monitoring, education, and use of lethal and non-lethal controls to reduce loss of livestock and deal with problem wolves.

As you all know however, some of these tools only become available if wolves are de-listed. And the best way we can assure that the ultimate delisting of wolves becomes part of a durable solution, and not just another trip on the long legal rollercoaster of wolves in Wisconsin, is to have a responsible, conservation-oriented management program that balances competing interests and values.

The 2023 Wolf Management Plan is a long-needed step forward. We want to thank all the department staff and stakeholders who have contributed to this product. It is long overdue and will help Wisconsin take an important step forward in securing our conservation legacy.

Wisconsin's Green Fire and our members encourage your support for this plan.



Fred Clark, Executive Director

fclark@wlgreenfire.org

www.wlgreenfire.org

PO Box 1206, Rhinelander, Wisconsin 54501 | 715.203.0384 | Info@wlgreenfire.org