



Attn: Secretary Adam Payne, Wisconsin Department of Natural Resources
Re: Draft Wolf Management Plan
Date: February 28, 2023

Dear Secretary Payne,

I write you today on behalf of the Congressional Sportsmen's Foundation (CSF) to provide comment on the draft Wisconsin Wolf Management Plan, which in its current form does not provide sufficient, data-driven mechanisms for managing the population. CSF respectfully recommends that the final version of the plan includes a target statewide population goal and a framework for management that includes hunting for when the wolf is ultimately delisted from the list of endangered species. Despite their charisma and mystery, wolves are not fundamentally different than any other wildlife species in Wisconsin, and CSF contends that it is a mistake to subject this species to a different wildlife management model.

Founded in 1989, the Congressional Sportsmen's Foundation is the informed authority across outdoor issues and serves as the primary conduit for influencing public policy. Working with the Congressional Sportsmen's Caucus (CSC), the Governors Sportsmen's Caucus (GSC), and the National Assembly of Sportsmen's Caucuses (NASC), CSF gives a voice to hunters, anglers, recreational shooters, and trappers on Capitol Hill and throughout state capitols advocating on vital outdoor issues that are the backbone of our nation's conservation legacy.

By abandoning a numeric population goal, a common practice followed by state wildlife management agencies across the country where wolf populations exist, the Wisconsin Department of Natural Resources (DNR) will not have an accurate frame of reference to evaluate whether the final version of the Wolf Management Plan is operating as intended. Wisconsin is home to roughly 1,100 wolves, which freely range in and out of Minnesota and Michigan, creating a regional population exceeding 4,000 wolves. CSF agrees that this wolf population has fully recovered and is fit to be delisted and actively managed by the individual states. However, without a statewide population goal, the DNR cannot implement management practices that aim to achieve a specific outcome, which will likely cause wolf populations to continue to grow beyond their biologic and cultural carrying capacity – negatively impacting the very wolves this plan seeks to manage, as well as livestock such as cattle, and a variety of wildlife species including elk and deer. Given the current impact that the wolf population already has on Wisconsin's natural ecosystems, CSF recommends that the DNR adopt a numeric population goal that is lower than the current population of the species in the state.

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Further, CSF maintains that hunting is the best means of managing wolf populations and recommends that the DNR create a framework for a science-based wolf hunting season that can be implemented upon the species' inevitable delisting. To ignore the likelihood that the wolf will be delisted before the next management plan is considered, which could be decades in the future, would fail to properly create a robust plan that uses all management practices available to the DNR.

Despite their charismatic demeanor, wolves are wildlife all the same and should be managed through the same state management practices that Wisconsin currently employs for its many wildlife species. State wildlife population management that includes hunting has produced countless success stories of species that were once extirpated from their historical ranges, including turkey, deer, and wood ducks, to name a few. Wolves should not be managed by a framework different than the other various species that occupy Wisconsin's storied landscape.

In conclusion, the Congressional Sportsmen's Foundation recommends that wolves are not granted a status that differentiates the species from other wildlife populations in Wisconsin. The draft Wolf Management Plan should be amended to implement a numeric population goal and should include a framework for achieving that numeric goal through hunting, once the wolf is inevitably removed from the endangered species list. I thank you for the opportunity to provide these comments and welcome any questions.

Sincerely,



Robert Matthews

Senior Coordinator, Great Lakes States

Congressional Sportsmen's Foundation

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