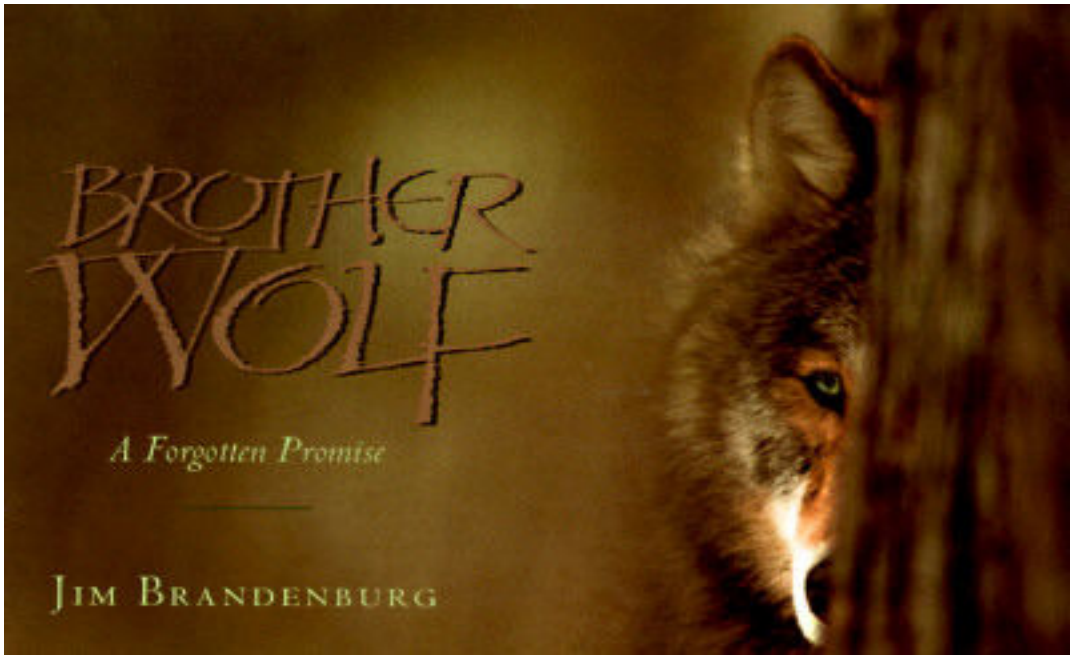


Petition for State Listing of Wolves in Wisconsin Under the Endangered Species Act

Submitted by: Melissa Smith, Stacy Gilson, Don Smith

To: Wisconsin Department of Natural Resources (DNR)

Petition for State Listing of the Gray Wolf (Canis lupus) as an Endangered or Threatened Species under the Wisconsin Endangered Species List- Formal Request for Designation: An Urgent Imperative for Wisconsin's Autonomous, Balanced, and Scientifically Advanced Wolf Management

We, the petitioners, formally and with profound urgency, request that the Wisconsin Department of Natural Resources (DNR) designate the gray wolf (Canis lupus) as a state-listed endangered or threatened species under the Wisconsin Endangered Species Act (WETSA). This designation is an essential, proactive, and unavoidable response to the systemic and accelerating collapse of consistent federal support, adequate resources, reliable long-term oversight, and an often outdated, narrow scientific approach to wolf conservation. Wolves play an essential ecological role in maintaining balance within their ecosystems. However, due to inadequate existing regulatory mechanisms at both federal and state levels, unsustainable hunting practices (as evidenced by the controversial 2021 wolf hunt that resulted in excessive harvests), habitat fragmentation, and escalating conflicts with human activities, wolves in Wisconsin face continued threats that jeopardize their very existence.

The underlying systemic issues—chronic federal underfunding, diminished federal agency capacity, and the historical unreliability of federal protections subject to political change—remain significant threats to long-term wolf recovery in Wisconsin.

Therefore, Wisconsin must be empowered to act autonomously, not only to ensure the effective implementation of its Wolf Management Plan and the enduring survival of its wolf population but also to pioneer a more holistic, balanced, and interdisciplinary scientific framework for wildlife stewardship, free from the constraints and inadequacies of a diminishing and scientifically limited federal role. State-level action is a crucial piece of the puzzle for conservation. This petition provides the scientific, legal, and ecological justification for listing wolves as a state-protected species, ensuring a future in which wolves and humans can coexist sustainably.

Introduction

As the petitioner, we formally request that the Wisconsin Department of Natural Resources (DNR) designate the gray wolf (*Canis lupus*) as a state-listed endangered or threatened species under the Wisconsin Endangered Species Act. Wolves play an essential ecological role in maintaining balance within their ecosystems. However, due to inadequate regulatory mechanisms, unsustainable hunting practices, habitat fragmentation, and escalating conflicts with human activities, wolves in Wisconsin face continued threats that jeopardize their long-term survival.

Scientific research, historical data, and lessons from past management failures, including the controversial 2021 wolf hunt that resulted in excessive harvests, demonstrate that the current framework for wolf conservation in Wisconsin is insufficient. Wolves continue to be subject to unstable population trends, habitat loss, retaliatory killings, political disputes over hunting policies, and diminishing federal oversight due to agency budget cuts.

Gray wolves serve as an indispensable keystone species, regulating prey populations and ensuring ecosystem health across forested and grassland regions. Their role is critical for ecological resilience. These factors jeopardize not only their long-term survival but also disrupt the cultural fabric and traditional ecological knowledge maintained by tribal communities, whose histories and spiritual practices are deeply intertwined with the presence of the wolf. Incorporating tribal indigenous rights into wildlife conservation is vital. Indigenous tribes in Wisconsin, whose ancestral lands and cultural narratives are inseparable from the story of the gray wolf, offer a rich legacy of stewardship and ecological insight. The absence of a collaborative approach that includes tribal perspectives has amplified conservation challenges and marginalized voices that have long championed harmony between human and non-human life.

States are able to create their own protections for species by listing them as threatened or endangered at the state level. This can provide some protection even if federal safeguards are weakened. It, of course, would depend on the state's willingness and capacity to enforce these protections. State-level action could be a crucial piece of the puzzle for conservation. Federal cuts and weakened enforcement can leave conservation efforts vulnerable, potentially leading to unchecked activities like unregulated hunting and poaching. It's worrisome when the structures meant to protect wildlife and enforce laws are dismantled or underfunded. It raises questions about how to effectively manage and protect natural resources.

For Wisconsin to effectively manage and protect its wolf population, state-level protections must be enacted to ensure population stability, prevent unregulated hunting, and promote

science-based conservation efforts. This petition provides the scientific, legal, and ecological justification for listing wolves as a state-protected species, ensuring a future in which wolves and humans can coexist sustainably.

Federal & State Endangered Species Criteria

Under Section 4 of the Endangered Species Act (ESA) (16 U.S.C. 1533) and its implementing regulations (50 CFR Part 424), a species may be designated as either:

- **Endangered**—meaning it is "in danger of extinction throughout all or a significant portion of its range".
- **Threatened**—meaning it is "likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range".

The Wisconsin Endangered Species Act similarly provides protections for species designated as endangered or threatened at the state level, ensuring that conservation measures extend beyond federal oversight and into localized management programs. Under the ESA, a species may be listed based on one or more of the following five factors:

1. Habitat destruction, modification, or curtailment
2. Overutilization for commercial, recreational, scientific, or educational purposes
3. Disease or predation
4. Inadequacy of existing regulatory mechanisms
5. Other natural or manmade factors affecting survival

The gray wolf (*Canis lupus*), an apex predator and keystone species, plays a vital role in maintaining Wisconsin's ecological balance. Its presence regulates prey populations, prevents habitat degradation, and supports biodiversity. However, growing threats—including federal regulatory rollbacks, inadequate state management, and habitat fragmentation—jeopardize its long-term viability. Federal conservation measures have eroded in recent years, with agencies like the U.S. Fish and Wildlife Service (USFWS) and the U.S. Geological Survey (USGS) facing budgetary constraints that hinder their capacity to enforce protective statutes and conduct rigorous scientific monitoring. Without intervention, these cuts reduce the ability of regulatory bodies to implement long-term conservation strategies grounded in the best available science. In response to these vulnerabilities, this petition urges the Wisconsin Department of Natural Resources (DNR) to designate the gray wolf as an Endangered or threatened species under the Wisconsin Endangered and Threatened Species Act (WETSA). This classification is essential to establishing legally binding protections, ensuring interagency collaboration, securing dedicated funding streams, and mandating science-based conservation policies independent of federal uncertainties.

The necessity of state protections became glaringly evident during the 2021 Wisconsin wolf hunt, which serves as a cautionary tale of abrupt delisting and poor management. Following a federal delisting in January 2021 (85 Fed. Reg. 69778, 2020), Wisconsin authorized a harvest quota of 119 wolves based on outdated population data. Within 72 hours, hunters killed 218 wolves—82% above the quota—using controversial methods such as dogs, bait, and night hunting. This indiscriminate overharvest, which removed 33% of breeding females, disrupted pack structures and likely reduced reproductive success for multiple seasons (Wisconsin DNR, 2021 Wolf Season Report). The hunt was widely condemned by conservationists, Indigenous

communities, and scientific experts who argued it violated sustainable management principles. In February 2022, a federal court reinstated ESA protections, ruling that recovery planning had been insufficient (Defenders of Wildlife v. U.S. Fish and Wildlife Service, No. 21-cv-00344, N.D. Cal. 2022; NPR, 2021). This episode starkly illustrates the fragility of Wisconsin's wolf population without a robust regulatory framework and reinforces the urgent need for **state-level protections** to prevent future mismanagement.

The historical trajectory of gray wolves in Wisconsin—from widespread abundance to near-extinction and partial recovery—offers critical lessons for conservation. Early eradication campaigns were driven by fear and misinformation, a pattern that persists in some modern opposition to wolf protections. Legal protections, including state and federal laws, have successfully reversed declines, but their removal has repeatedly led to increased mortality during delisting periods. Indigenous perspectives, particularly those of the Ojibwe, emphasize coexistence and ecological balance, presenting a valuable model for sustainable management. Most importantly, science-based conservation is imperative. The **failure of the 2021 hunt** was due to inadequate data and rushed decision-making, a risk exacerbated by current challenges such as funding shortages, weakened interagency collaboration, and reduced scientific expertise. These lessons underscore the need to list gray wolves as **endangered or threatened under WETSA**, embedding their conservation within Wisconsin's legal and scientific framework to ensure **stability, resilience, and long-term survival**.

Gray wolves in Wisconsin meet multiple criteria justifying state-level protection. While the population has rebounded to approximately 1,000 individuals (Wisconsin DNR, 2023a), their recovery remains geographically limited, with large portions of suitable habitat in central and southern Wisconsin still unoccupied (Mladenoff et al., 1995). Human-caused mortality remains a significant threat, with illegal poaching accounting for a substantial portion of wolf deaths (Treves et al., 2017). Habitat fragmentation restricts dispersal and reduces genetic diversity, exacerbating risks from inbreeding. Disease pressures—including sarcoptic mange, canine parvovirus, and distemper—lower pup survival rates and disrupt pack stability (Almberg et al., 2012; Jara et al., 2016). Additionally, climate change poses long-term challenges by altering prey availability and increasing disease prevalence (Harvell et al., 2002). These combined factors illustrate that Wisconsin's wolf population remains vulnerable despite recent gains, reinforcing the necessity for **state protections** to prevent future declines.

The **federal Endangered Species Act (ESA)** provides crucial protection for wolves, prohibiting hunting except in specific circumstances and funding conservation programs. However, **federal policies are subject to change**, making state intervention critical. The ESA mandates that listing decisions be based on **the best available scientific and commercial data** (16 U.S.C. § 1533). These same criteria apply to **delisting**, requiring post-delisting monitoring for five years (ESA § 4(g)). If monitoring data indicates substantial risk, USFWS may relist wolves under **emergency provisions**. Given repeated delisting attempts in 2007, 2012, and 2021—each followed by population instability—Wisconsin must act independently to **reinforce protections** under WETSA and safeguard wolves from the uncertainty of federal oversight.

The 1999 Wisconsin Wolf Management Plan set a recovery target of 350 wolves, which was met by 2004 when 373 individuals were documented (Wisconsin DNR, 1999). Unlike regions such as Yellowstone, where wolves were reintroduced, Wisconsin's recovery was natural, driven by recolonization from Minnesota and abundant prey populations (Wisconsin DNR, 2023). However, the 2021 hunt demonstrated that premature delisting can reverse conservation progress, as illegal killings increased by 20–30% when protections were weakened (Wisconsin DNR Wolf Monitoring Reports). Without permanent state protections, wolf recovery in Wisconsin remains precarious, constantly at risk from political and regulatory changes. The gray wolf (*Canis lupus*) has played a vital role in maintaining ecological balance in Wisconsin, shaping the health of forests and prey populations for centuries. While federal protections under the Endangered Species Act (ESA) have supported the recovery of wolves, delisting does not signify that threats have disappeared. In fact, post-delisting monitoring is a critical phase—a time when protections must be carefully maintained to prevent population decline due to increased human-wolf conflicts, habitat fragmentation, and mismanagement. Given these risks, Wisconsin must take proactive steps to list the gray wolf as an endangered or threatened species under state law during the post-delisting period to ensure stable populations, protect ecological integrity, and avoid the conservation failures seen in previous delistings.

The ESA mandates that any species removed from the endangered list must undergo at least five years of monitoring. However, federal agencies, particularly the U.S. Fish and Wildlife Service (USFWS), have been weakened by budget cuts and shifting policy priorities, making them increasingly unable to provide comprehensive oversight. Wisconsin's Department of Natural Resources (DNR) has historically relied on federal support for wolf population surveys, conflict mitigation, and habitat management, but these resources may not remain dependable during the monitoring period. Without strong, state-level protections, the gray wolf could easily be subjected to unstable regulatory shifts, particularly given past delisting failures. When wolves were previously delisted in 2007, 2012, and 2021, populations suffered due to unregulated hunting seasons, illegal killings, and habitat degradation—leading to a necessity for re-listing under federal protections.

Wisconsin's 2021 emergency wolf hunt serves as a stark warning of the dangers of premature delisting and inadequate regulatory safeguards. Following a rushed delisting decision in early 2021, Wisconsin authorized a quota of 119 wolves for harvest. However, within just 72 hours, hunters killed 218 wolves, exceeding the quota by 82 percent. The use of dogs, baiting, and night hunting fueled this uncontrolled overharvest, disproportionately targeting breeding females and destabilizing pack structures. This reckless management prompted fierce backlash from conservationists, Indigenous communities, and scientists, who rightly argued that wolf recovery

had been placed in jeopardy. By February 2022, a federal court reinstated ESA protections, citing poor recovery planning. This incident demonstrates a dangerous pattern in wolf management: every time federal protections are lifted, wolves experience severe population declines due to rushed, politically driven hunting seasons without proper population assessments. A state- endangered or threatened designation during the post-delisting phase would prevent such catastrophic mismanagement and ensure that any regulated hunting aligns with scientifically determined population sustainability.

The ESA defines a threatened species as one "likely to become endangered within the foreseeable future." The gray wolf still meets this definition, particularly given the ongoing threats of poaching, habitat loss, and unrestricted hunting proposals in Wisconsin. Listing wolves as threatened under Wisconsin's Endangered Species Law would allow the state to maintain regulatory oversight, ensuring wolves do not spiral into another endangerment crisis. During past delisting periods, illegal wolf killings increased by 20 to 30 percent, undermining conservation efforts. Without strong state protections, poaching and overharvesting could escalate during the post-delisting phase, jeopardizing population stability before federal agencies even complete their monitoring. Additionally, habitat fragmentation due to logging, urban expansion, and climate change further threatens wolves' ability to disperse and maintain genetic diversity. A Wisconsin-threatened listing would allow the state to enforce habitat protections, prevent excessive hunting quotas, and control human-wildlife conflicts without relying on uncertain federal support.

The Ojibwe, Menominee, and Ho-Chunk Nations have long maintained sustainable wolf conservation approaches, viewing *ma'iingan* (wolf) as a spiritual kin and ecological guardian. State protections must acknowledge tribal rights as well as integrate Indigenous perspectives into wildlife management. By listing wolves as endangered or threatened under Wisconsin law, tribal governments can work alongside the DNR to ensure management strategies align with long-term sustainability. The Wisconsin endangered or threatened listing would also mandate consultation with tribal nations before enacting hunting seasons or land-use changes that affect wolf populations.

Wisconsin's gray wolves remain vulnerable despite federal delisting, making the post-delisting monitoring period a critical time for conservation. If the 2021 wolf hunt has shown anything, it is that immediate protections must be enforced at the state level to prevent unsustainable management decisions. By listing wolves as endangered or threatened under Wisconsin law, the state would uphold science-based population management, limit excessive hunting quotas, protect habitat connectivity, and ensure that federal monitoring efforts do not fall short due to political shifts.

Listing the gray wolf as an endangered or threatened species under WETSA during the entirety of the post delisting monitoring will ensure that its conservation remains grounded in science, protected from political shifts, and reinforced by legal mechanisms. This designation will strengthen science-based conservation policies, secure dedicated funding for habitat restoration and enforcement, mandate tribal consultation in management decisions, and prevent unsustainable hunting quotas that endanger population stability. Wisconsin must act now to ensure that wolves remain an integral part of its forests, reinforcing biodiversity and contributing to the ecological and cultural heritage of the state for generations to come.

Threats to Wolves in Wisconsin

Habitat Loss & Fragmentation: Wolves rely on large, undisturbed wilderness areas to maintain stable populations. However, Wisconsin's expanding urban development, deforestation, and increased agricultural land use have fragmented crucial habitat corridors. This forces wolves into closer proximity to humans and livestock, increasing the likelihood of retaliatory killings, accidental deaths, and conflicts with rural communities. Without designated habitat protections and buffer zones, wolf populations remain vulnerable to long-term decline due to limited range availability and genetic bottlenecks.

Historical and Current Wolf Populations: Prior to European settlement in the early 19th century, gray wolves thrived across Wisconsin's 56,000 square miles, with populations estimated between 3,000 and 5,000 individuals. They occupied diverse ecosystems, including northern hardwood forests, prairies, and wetlands, serving as apex predators that regulated populations of white-tailed dōeer, elk, and historically bison. Their presence prevented overgrazing, preserving forest understories and sustaining biodiversity. Wolves influenced trophic cascades, benefiting species such as beavers, whose dams created wetlands, and songbirds, whose nesting habitats were protected from excessive deer browsing. Beyond their ecological impact, wolves held profound cultural significance for Wisconsin's Indigenous tribes. The Ojibwe, or Anishinaabe, regard the wolf (*ma'iingan*) as a clan animal and spiritual kin,

embodying resilience and guardianship. Other tribes, including the Menominee and Ho-Chunk, incorporated wolves into oral histories as teachers of hunting and survival, emphasizing mutual respect and ecological balance. These perspectives affirm the wolf as a cultural keystone species, integral to Indigenous identity and sustainable coexistence practices.

However, the arrival of European settlers brought rapid declines in wolf populations. Perceived as a threat to livestock and game, wolves became the target of aggressive eradication campaigns. In 1865, Wisconsin instituted a bounty system, paying up to $5 per wolf pelt, incentivizing mass killings. By the 1880s, as many as 1,500 wolves were slaughtered annually, with historical records documenting over $25,000 in bounty payments—equivalent to roughly $600,000 in today's dollars. These efforts far exceeded actual livestock losses, estimated at just $10,000 annually, illustrating that fear and misinformation, rather than science, drove extermination policies. Habitat destruction exacerbated their decline, as logging clear-cut 70% of northern forests by 1900, reducing cover and prey availability. Agricultural expansion fragmented wolf territories, isolating populations and disrupting pack dynamics. By the 1920s, wolves were restricted to remote northern forests, and by the 1950s, fewer than 20 remained in Wisconsin. In 1960, the state classified wolves as a protected species, halting bounty programs, but the population remained dangerously low without broader conservation measures.

The Endangered Species Act (ESA) of 1973 marked a turning point in wolf conservation. Wolves were listed as endangered in 1974, granting federal protections that prohibited killing except in defense of human life. Wisconsin reinforced these safeguards by designating wolves as an endangered species under state law in 1972, imposing fines for illegal killings and prioritizing conservation efforts on public lands like the Chequamegon-Nicolet National Forest. Unlike Yellowstone National Park, where wolves were actively reintroduced, Wisconsin's population rebounded through natural recolonization from Minnesota. Favorable conditions—abundant deer populations and expansive protected habitats—allowed for steady recovery. By 1980, the wolf population had grown to 25 individuals across five packs. The 1999 Wisconsin Wolf Management Plan set a recovery goal of 350 wolves, a target surpassed by 2004 with 373 individuals documented. However, federal delisting attempts in 2007, 2012, and 2021 triggered legal disputes, as each period of reduced protection saw spikes in poaching and legal mortality, with illegal kills increasing by 20–30% in delisted years.

The February 2021 wolf hunt underscored the dangers of inconsistent management. Following a federal delisting in January 2021, Wisconsin hastily set a quota of 119 wolves based on outdated population estimates, failing to account for real-time ecological data. Within just 72 hours, hunters killed 218 wolves—82% above the quota—using controversial methods such as dogs, bait, and night hunting. The hunt disproportionately targeted breeding females, disrupting pack dynamics and likely reducing reproductive success for multiple seasons. Conservationists, Indigenous communities, and scientists widely condemned the overharvest, arguing that it violated principles of sustainable management. In February 2022, a federal judge reinstated ESA protections, citing inadequate recovery planning. This episode highlights the fragility of Wisconsin's wolf population without strong regulatory safeguards and reinforces the urgent need for state-level protections to prevent similar mismanagement in the future.

Wisconsin's history of wolf conservation provides critical lessons. Human perceptions, often shaped by misinformation, have historically dictated policy decisions, from early eradication

efforts to modern opposition to wolf protection. Legal protections have proven effective in reversing declines, yet their removal consistently leads to population instability. Indigenous perspectives offer valuable insights into coexistence and ecological balance, presenting a model for sustainable management. Finally, effective conservation requires science-based policies. The failure of the 2021 hunt resulted from inadequate data and rushed decision-making, highlighting the importance of well-funded monitoring programs, interagency cooperation, and evidence-driven policy frameworks. To ensure stability and resilience, Wisconsin must formally list the gray wolf as an endangered or threatened species under the Wisconsin Endangered and Threatened Species Act (WETSA). This designation would integrate wolf conservation into state law, providing robust protections independent of federal uncertainty, ensuring wolves remain an integral part of Wisconsin's ecosystems for generations to come.

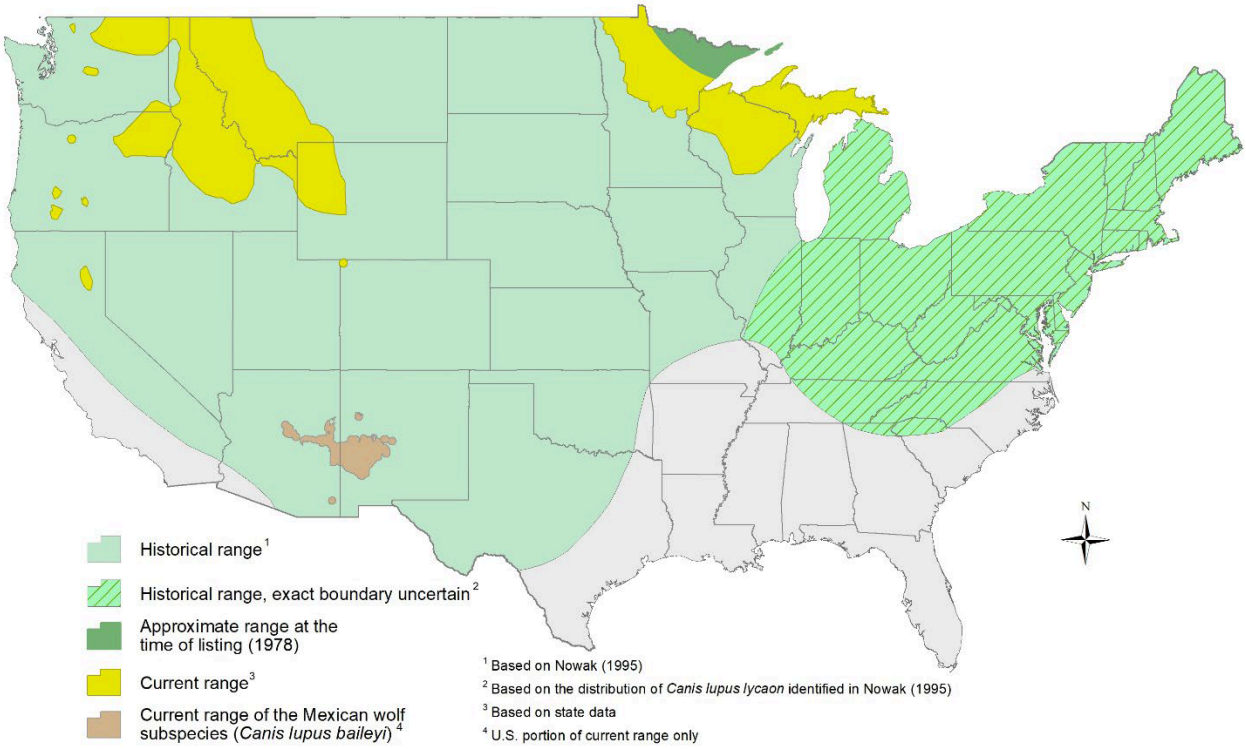


Figure 1. *Historic and current range of gray wolves across the lower 48 states. Red wolves (Canis rufus) would have occupied the gray areas of the southeastern United States. Credit: USFWS 2020a.*

Current Wisconsin Wolf Range: Wolves occupy approximately 25,000 square miles, corresponding to 44% of Wisconsin's land area. Notably, 85% of the population resides on federal or state public lands, such as the Chequamegon-Nicolet National Forest, Nicolet State Forest, and other protected areas, minimizing conflicts with private agricultural operations.

- **Northern Forest Zone:** Encompassing Bayfield, Douglas, and Ashland Counties, this region hosts 60% of Wisconsin's wolf packs. Dense forests, abundant prey (deer densities averaging 20–30 per square mile), and low human population density create ideal conditions.

- **Central Forest Zone:** Including Marathon, Wood, and Clark Counties, this area supports an expanding but smaller population, constrained by higher road density and agricultural activity.

Overutilization Through Unregulated Hunting Practices: Wisconsin's 2021 wolf hunt serves as a key case study in management failures. With no permanent regulations in place, an emergency wolf hunt resulted in excessive and unsustainable harvests, killing hundreds of wolves in a matter of days. This jeopardized the ecological balance wolves help maintain by regulating prey populations, preventing overgrazing, and supporting biodiversity. Without state protections, wolves remain vulnerable to future policy shifts that could lead to further unregulated hunting seasons, which are based on political motives rather than ecological science. We need clearer distinction between genuine stakeholders versus groups with hidden agendas. It's about keeping decisions in the hands of the local community and not letting outside interests dictate the conversation; accountability and transparency should be fundamental. When agencies forget they're public servants, it erodes trust. It's a complex issue, often tied to power dynamics and entrenched interests.

Retaliatory Killings & Human-Wildlife Conflict: Due to misconceptions about wolf behavior and the belief that lethal control is the only effective management tool, wolves face retaliatory killings from landowners concerned about livestock losses. While instances of predation do occur, scientific data shows that non-lethal management strategies—such as livestock guardian animals and wolf fencing—significantly reduce conflicts. Without expanded funding for non-lethal deterrence programs, human-wildlife conflicts will continue, prompting further calls for wolf culling, hunting seasons, and unrestricted lethal management. The methods used for wolf hunting are deeply disturbing and reflect a lack of respect for wildlife. It's troubling to think that these attitudes could become more widespread if enforcement is lax. There's a need for strong regulations and oversight to prevent such cruelty. Currently, permanent wolf hunting rules are lacking and have been politically manipulated. The DNR has held strong on preventing certain hunting methods, but the existing rules are not strong enough. The cruelty involved in some wolf hunting practices suggests a motivation beyond conservation, aiming to remove wolves from the landscape.

Declining Federal Oversight & Budget Cuts: Historically, the U.S. Fish and Wildlife Service (FWS) played a crucial role in monitoring wolf populations under federal endangered species protections. However, budget reductions have limited the ability of federal agencies to enforce conservation regulations, meaning Wisconsin must take state-level responsibility for ensuring wolf populations remain stable through science-based management. Without strong state protections, wolves in Wisconsin risk falling into policy limbo, where inconsistent enforcement, federal-state disputes, and shifting conservation priorities leave them without clear safeguards. Federal budget cuts under the current administration have significantly undermined wildlife conservation efforts, reducing the capacity of agencies like the U.S. Fish and Wildlife Service (USFWS) and U.S. Geological Survey (USGS) to support wolf management and broader ecological programs. For Wisconsin, these cuts necessitate a proactive, state-led response to protect the gray wolf and other wildlife.

Lack of Permanent Regulatory Framework for Wolf Management: As of today, Wisconsin does not have permanent management rules in place for wolves, leaving their future uncertain.

Current policies are subject to political influence rather than long-term conservation strategy, meaning that wolf populations could be opened to another unregulated hunt in future seasons. By designating wolves as a state-listed species, Wisconsin can ensure a consistent, enforceable framework for their protection—preventing reckless hunting **seasons that repeat the failures of 2021.**

The Failing Federal Framework: A Detailed Account of Why Wisconsin Must Assume Sole *Responsibility*
Excerpt from interview with US Fish and Wildlife Service Great Lakes

Question: What was the impact of the voluntary early retirement offer on your lab's staffing? Answer: The voluntary early retirement offer effectively eliminated positions, meaning that if employees didn't retire voluntarily, they risked a reduction in force. This process caused significant uncertainty, leading to reduced productivity and the outsourcing of work to colleges and nonprofits. Field scientists and biologists provide raw data essential for policy decisions, but without adequate staffing and funding, critical research and regulatory mechanisms are diminished or eliminated.

Gray Wolf Status and the Need for State-Level Listing in Wisconsin

Wisconsin Championing a Holistic, Independent, and Culturally Inclusive Conservation Future: The primary impetus for this petition is the urgent need for Wisconsin to transcend the limitations of a failing federal system and pioneer a more comprehensive approach to wolf conservation. Gray wolves are indispensable keystone species, regulating prey populations and ensuring ecosystem health across forested and grassland regions. Their role is critical for ecological resilience. State listing will provide the legal, structural, and philosophical foundation for Wisconsin. The historical trajectory of gray wolves in Wisconsin—from widespread abundance to near-extinction and partial recovery—offers critical lessons for conservation. Early eradication campaigns were driven by fear and misinformation, a pattern that persists in some modern opposition to wolf protections. Legal protections, including state and federal laws, have successfully reversed declines, but their removal has repeatedly led to increased mortality during delisting periods. Indigenous perspectives, particularly those of the Ojibwe, emphasize coexistence and ecological balance, presenting a valuable model for sustainable management. Most importantly, science-based conservation is imperative. The failure of the 2021 hunt was due to inadequate data and rushed decision-making, a risk exacerbated by current challenges such as funding shortages, weakened interagency collaboration, and reduced scientific expertise. These lessons underscore the need to list gray wolves as endangered or threatened under WETSA, embedding their conservation within Wisconsin's legal and scientific framework to ensure stability, resilience, and long-term survival.

The federal Endangered Species Act (ESA) provides crucial protection for wolves, prohibiting hunting except in specific circumstances and funding conservation programs. However, federal policies are subject to change, making state intervention critical. The ESA mandates that listing decisions be based on the best available scientific and commercial data (16 U.S.C. § 1533). These same criteria apply to delisting, requiring post-delisting monitoring for five years (ESA § 4(g)). If monitoring data indicates substantial risk, USFWS may relist wolves under emergency provisions. Given repeated delisting attempts in 2007, 2012, and 2021—each followed by

population instability—Wisconsin must act independently to reinforce protections under WETSA and safeguard wolves from the uncertainty of federal oversight.

The 1999 Wisconsin Wolf Management Plan set a recovery target of 350 wolves, which was met by 2004 when 373 individuals were documented. However this was never intended as a population cap but a goal to strive for. (Wisconsin DNR, 1999). Unlike regions such as Yellowstone, where wolves were reintroduced, Wisconsin's recovery was natural, driven by recolonization from Minnesota and abundant prey populations (Wisconsin DNR, 2023). However, the 2021 hunt demonstrated that premature delisting can reverse conservation progress, as Gray wolves in Wisconsin meet multiple criteria justifying state-level protection. While the population has rebounded to approximately 1,000 individuals (Wisconsin DNR, 2023a), their recovery remains geographically limited, with large portions of suitable habitat in central and southern Wisconsin still unoccupied (Mladenoff et al., 1995). Human-caused mortality remains a significant threat, with illegal poaching accounting for a substantial portion of wolf deaths (Treves et al., 2017). Habitat fragmentation restricts dispersal and reduces genetic diversity, exacerbating risks from inbreeding. Disease pressures—including sarcoptic mange, canine parvovirus, and distemper—lower pup survival rates and disrupt pack stability (Almberg et al., 2012; Jara et al., 2016). Additionally, climate change poses long-term challenges by altering prey availability and increasing disease prevalence (Harvell et al., 2002). These combined factors illustrate that Wisconsin's wolf population remains vulnerable despite recent gains, reinforcing the necessity for state protections to prevent future declines.

Illegal killings increased by 20–30% when protections were weakened (Wisconsin DNR Wolf Monitoring Reports). Without permanent state protections, wolf recovery in Wisconsin remains precarious, constantly at risk from political and regulatory changes.

Listing the gray wolf as an endangered or threatened species under WETSA will ensure that its conservation remains grounded in science, protected from political shifts, and reinforced by legal mechanisms. This designation will strengthen science-based conservation policies, secure dedicated funding for habitat restoration and enforcement, mandate tribal consultation in management decisions, and prevent unsustainable hunting quotas that endanger population stability. Wisconsin must act now to ensure that wolves remain an integral part of its forests, reinforcing biodiversity and contributing to the ecological and cultural heritage of the state for generations to come.

Establish Fiscal Autonomy for Integrated Wolf Management: By designating wolves as state-threatened or endangered Wisconsin can statutorily authorize and prioritize the allocation of dedicated state funds to support a Wolf Management Plan that explicitly incorporates interdisciplinary research and addresses the socio-economic and cultural dimensions of wolf conservation, fully compensating for the narrowly focused and now largely absent federal funding streams. This includes fully funding all aspects of a balanced Wolf Management Plan—from robust population monitoring and scientific research to effective non-lethal conflict prevention, fair compensation, and public education. State listing can unlock resources through mechanisms like the Endangered Resources initiative (funded by voluntary tax contributions and specialty license plate sales), which has historically bolstered conservation efforts (e.g., over $100,000 paid in 2022 for wolf-related losses).

Ensure Continuity and Expansion of Critical Science-Based Management – Embracing Interdisciplinarity: With federal scientific contributions and technical support (e.g., from USFWS for surveys, USGS for research) dwindling to negligible levels, state listing empowers Wisconsin to invest in, direct, and maintain its own robust scientific programs that are explicitly interdisciplinary. This means defining "best available science" for Wisconsin as inherently interdisciplinary, moving beyond mere population counts to a holistic understanding of wolves within their complex socio-ecological context. This includes integrating Social Sciences, incorporating Economic Analyses, valuing Traditional Ecological Knowledge (TEK), and considering Ethical Dimensions.

Secure Legal Authority for Comprehensive Management: State designation provides the authority to impose binding restrictions on illegal hunting, trapping, and poaching and to manage wolf populations according to state-determined needs, even if federal protections are rolled back. It allows Wisconsin to craft and enforce a management plan tailored to local needs—setting population goals, regulating hunting (if deemed scientifically justifiable and sustainable by state authorities), and protecting critical habitats like denning sites—mirroring autonomy previously exercised and ensuring an enforceable framework preventing reckless seasons like 2021.

Addressing Enforcement Challenges with Nuance: Wisconsin's current conservation warden force, numbering fewer than 200 officers statewide for 25,000 sq miles, faces significant challenges, evidenced by a reported 25% increase in poaching incidents during delisted periods. State listing provides the mandate and justification for increased state funding for enforcement personnel, expanded patrol coverage, specialized anti-poaching training, and community-based approaches to address the root causes of illegal activities. The methods used for some wolf hunting are deeply disturbing; strong state regulations are needed.

Other Natural or Manmade Factors Affecting Survival: Retaliatory killings, political disputes over hunting policies, diminishing federal oversight, and the cruelty involved in some wolf hunting practices (suggesting motivations beyond conservation, aiming to remove wolves from the landscape) all contribute to ongoing threats.

Stable Yet Geographically Limited Recovery: Recent monitoring data from the 2022-2023 survey estimated a minimum of approximately 1,000 wolves—with a 90% confidence interval of 972 to 1,026 individuals distributed among roughly 250 packs (Wisconsin DNR, 2023a). Although this overall stability represents a conservation success, the population remains largely concentrated in northern Wisconsin while vast, historically suitable areas in central and southern regions remain unoccupied (Mladenoff et al., 1995). This uneven distribution signals that, despite local successes, full ecological recovery has not been achieved. Continued protection is therefore essential because persistent threats and geographic limitations prevent full statewide recovery. A state endangered listing would ensure long-term safeguards during continued range expansion and population dispersal.

Potential Future Delisting and Policy Shifts: Past experience during delisted periods (e.g., 2012-2014, 2021) demonstrates that removal of protections can lead to dramatic overharvesting. The draft 2023 Wolf Management Plan hints at potential policy relaxations that could allow hunting under state law, risking a repeat of events like the overharvest seen in 2021

(Wisconsin DNR, 2021; Defenders of Wildlife v. USFWS, 2022). The Wisconsin DNR should oppose any support for the current methods proposed to delist gray wolves in Wisconsin, particularly through a Congressional Bill that seeks to restore the Trump administration's illegal 2019 delisting decision. This approach, which bypasses judicial review, ignores scientific evidence, misuses the Endangered Species Committee (colloquially known as the "God Squad"), and fails to provide a mechanism for relisting, is not only illegal but also a direct assault on democracy, the rule of law, and the Endangered Species Act (ESA). Furthermore, as highlighted by a Ninth Circuit judge, the absence of a regulatory backstop in this framework renders it wholly inadequate to protect wolves, leaving Wisconsin's wolf population vulnerable to irreversible harm. Supporting such methods is outrageous and contrary to the principles of science-based conservation and public accountability.

Background- The Illegal 2019 Delisting Decision: In November 2019, the Trump administration, through the U.S. Fish and Wildlife Service (USFWS), proposed a rule to remove gray wolves from the federal ESA list across the lower 48 states, excluding the Mexican wolf subspecies (*Canis lupus baileyi*) [84 Fed. Reg. 9648, March 15, 2019]. This decision was finalized in November 2020, effective January 4, 2021 [85 Fed. Reg. 69778, November 3, 2020].

However, on February 10, 2022, a federal district court in the Northern District of California vacated the 2020 delisting rule, restoring endangered status to gray wolves in Wisconsin and most of the lower 48 states (Defenders of Wildlife v. U.S. Fish and Wildlife Service, No. 21-cv-00344, N.D. Cal. 2022). The court found that the USFWS failed to adequately consider threats to wolf populations outside core recovery areas and ignored the absence of wolves in significant portions of their historical range, violating the ESA's requirement to base decisions on the best available science. The 2019-2020 delisting process was also deemed to violate the Administrative Procedure Act (APA), which mandates that agency actions be transparent, evidence-based, and subject to public input (5 U.S.C. § 553). The court likely determined that the USFWS acted arbitrarily and capriciously by disregarding scientific data, failing to provide sufficient public comment opportunities, or not justifying the decision with a rational basis. This ruling underscored that the delisting was illegal, setting a clear legal precedent that any attempt to reinstate it must address these procedural and substantive flaws.

The Congressional Bill: Restoring an Illegal Decision: The Congressional Bill in question—likely referencing the "Trust the Science Act" (H.R. 764, passed by the U.S. House in April 2024)—seeks to restore the Trump administration's 2019-2020 delisting decision by legislatively removing gray wolves from the ESA list and prohibiting judicial review of this action [Congress.gov, H.R. 764, 118th Congress]. This move directly attempts to circumvent the 2022 court ruling, which declared the delisting illegal, and reinstate a policy that was struck down for its failure to comply with the ESA and APA. By doing so, it not only disregards the judiciary's role but also perpetuates the same legal and scientific deficiencies that led to the original decision's invalidation.

Why This Is Illegal: The 2019-2020 delisting was ruled illegal because it violated the APA and ESA by bypassing required processes, such as relying on the best available science and ensuring public participation. The Congressional Bill does not rectify these violations; instead, it seeks to enforce the same unlawful outcome through legislation, effectively nullifying the court's

ruling. This is a blatant challenge to the rule of law, as it ignores the judicial determination that the delisting lacked legal grounding. Furthermore, by prohibiting judicial review, the bill attempts to shield this action from legal scrutiny, preventing courts from assessing its compliance with federal law—a tactic that undermines the checks and balances essential to a functioning legal system. The ESA requires that listing or delisting decisions be based solely on the best scientific and commercial data available (16 U.S.C. § 1533(b)(1)(A)). The 2022 court ruling highlighted that the USFWS failed to meet this standard, and the Congressional Bill does nothing to address this deficiency. Instead, it seeks to impose a political decision without scientific justification, further violating the ESA's mandate.

The Misuse of the "God Squad": Proponents of delisting may misleadingly reference the Endangered Species Committee, colloquially known as the "God Squad," which has the authority to exempt certain federal projects from ESA requirements under narrow circumstances (16 U.S.C. § 1536(e)-(p)). However, this committee has no role in species delisting decisions, which are governed by a separate process under Section 4 of the ESA (16 U.S.C. § 1533). Suggesting that the "God Squad" could decide wolf delisting is a gross mischaracterization of the law and a distraction from the required science-based process. Supporting a delisting method that relies on such an irrelevant mechanism is not only misguided but also undermines the credibility of wolf management in Wisconsin. The DNR must reject any proposal that substitutes political bodies for rigorous scientific evaluation.

Under the Trump administration, the "God Squad" was reactivated through executive orders that designated a national "energy emergency," aiming to systematically identify and potentially waive ESA restrictions that impede domestic energy infrastructure projects. Although its legal authority remains constrained until an exemption request is formally initiated, its regular convening signals a policy shift toward prioritizing energy development over comprehensive species protection.

Ignoring Science and Public Input: The Congressional Bill and related delisting efforts appear to dismiss the best available science, which indicates that gray wolves in Wisconsin remain vulnerable despite a population of approximately 1,000 individuals (Wisconsin DNR, 2023 Wolf Monitoring Report). Ongoing threats, including human-caused mortality (e.g., poaching, vehicle collisions), habitat fragmentation, and diseases like sarcoptic mange, underscore the need for continued protections (Treves et al., 2017, Journal of Mammalogy; Jara et al., 2016, PLoS ONE). The 2021 Wisconsin wolf hunt, which killed 218 wolves—exceeding the quota by 82%—demonstrates the risk of overexploitation without federal oversight (Wisconsin DNR, 2021 Wolf Season Report). Moreover, the bill's apparent disregard for public comment is a direct affront to the ESA's and Wisconsin's commitment to public participation. The 2019-2020 delisting process was criticized for inadequate public input, and this legislative approach exacerbates that flaw by preempting further engagement. Wisconsin residents, including conservationists, Native American tribes, and rural communities, deserve a voice in wolf management, which this bill seeks to silence.

No Relisting Mechanism- A Fatal Flaw: A critical deficiency in the Congressional Bill is the absence of a mechanism to relist wolves if their population declines or new threats emerge. The ESA provides for relisting species when warranted (16 U.S.C. § 1533(c)), but the bill's structure—by removing wolves from federal oversight and barring judicial review—effectively

eliminates this safeguard. This lack of a regulatory backstop was a key concern raised by a Ninth Circuit judge in related ESA cases, such as *Tucson Herpetological Society v. Salazar* (566 F.3d 870, 877, 9th Cir. 2009), where the court emphasized that agencies must provide a rational explanation for why a species no longer requires protection and ensure mechanisms exist to address future risks. Without a relisting option, the bill leaves Wisconsin's wolves vulnerable to catastrophic declines, as seen in past delisting periods, with no legal pathway to reinstate protections. The Ninth Circuit has repeatedly held that the absence of adequate regulatory mechanisms is grounds for maintaining or reinstating ESA protections (*Greater Yellowstone Coalition v. Servheen*, 665 F.3d 1015, 9th Cir. 2011). In Wisconsin, state management plans, such as the 2023 Wolf Management Plan, rely on federal oversight to enforce sustainable practices (Wisconsin DNR, 2023 Wolf Management Plan). Without a federal framework, as the bill proposes, the state's ability to respond to population declines is compromised, rendering the regulatory mechanism inadequate.

Violence Against Democracy and the Rule of Law: The Congressional Bill's attempt to restore the illegal 2019 delisting decision is a direct attack on democratic principles and the rule of law:

- **Undermining Checks and Balances:** The U.S. Constitution establishes three branches of government—executive, legislative, and judicial—to ensure accountability. The 2022 court ruling was the judiciary fulfilling its role by striking down an unlawful delisting. For Congress to override this ruling through legislation is a power grab that dismisses the judiciary's authority, weakening the separation of powers essential to democracy.
- **Bypassing Public Accountability:** The ESA and Wisconsin's conservation laws prioritize public input, as seen in the state's public comment periods for wolf management plans (Wisconsin DNR, Public Input on Wolf Management). By preempting judicial review and public comment, the bill shuts out Wisconsinites, including those who value wolves for ecological, cultural, or economic reasons, effectively silencing democratic participation.
- **Eroding the Rule of Law:** The federal framework provided by the ESA ensures science-based, transparent decision-making. The bill's approach—described by critics as removing the "federal framework" and leaving "no backstop"—dismantles this structure, replacing it with a political fiat that ignores legal precedents and scientific evidence. As a Ninth Circuit judge has noted in similar contexts, such actions leave "the rule of law gone," as they prioritize expediency over legal integrity (*Center for Biological Diversity v. U.S. Fish and Wildlife Service*, 807 F.3d 1031, 9th Cir. 2015).

Wisconsin's gray wolves, estimated at ~1,000 individuals, are a conservation success story but remain vulnerable. Their role as a keystone species, regulating deer populations and supporting biodiversity, is critical to the state's ecosystems (Callan et al., Journal of Ecology).

Past delistings have shown that state management alone, without federal oversight, can lead to unsustainable hunting, as evidenced by the 2021 hunt's impact (Milwaukee Journal Sentinel, 2021). Supporting a delisting method that ignores science, eliminates relisting options, and bypasses legal processes risks reversing decades of recovery and threatens the ecological and cultural value of wolves in Wisconsin. The Congressional Bill's approach also sets a dangerous precedent. If Congress can override court rulings and ESA protections for wolves, it could do so for any species or environmental regulation, undermining Wisconsin's ability to manage its natural resources responsibly. The DNR, as a steward of Wisconsin's wildlife, must reject this precedent to protect not only wolves but also the broader framework of conservation law. Supporting the Congressional Bill to delist gray wolves is indefensible. It seeks to restore the Trump administration's illegal 2019 delisting decision, dismissed by a federal court for violating the ESA and APA. By ignoring science, misrepresenting the role of the "God Squad," prohibiting judicial review, and failing to provide a relisting mechanism, this approach is a flagrant violation of the rule of law. As a Ninth Circuit judge has emphasized, the absence of a regulatory backstop leaves "no backstop" and renders the federal framework "gone," exposing wolves to irreparable harm. This is not just a policy misstep—it's a violent assault on democracy, silencing Wisconsin's public and dismantling the checks and balances that protect our environment. **We urge the Wisconsin DNR and State Legislature to list the gray wolf as a threatened or endangered species** to ensure their survival and the continued benefits they provide. This decision will align with the best available science, public support, and fiscal responsibility, securing a thriving future for Wisconsin's wildlife and communities. The Wisconsin DNR must stand against this bill and any delisting method that sacrifices science, transparency, and

accountability. Wolves in Wisconsin deserve a delisting process that respects the law, engages the public, and ensures their long-term survival.

Ecological Importance

Gray wolves fulfill a keystone role in Wisconsin's ecosystems. Their predation regulates white-tailed deer populations, which in turn prevents overgrazing, facilitates forest regeneration, and sustains biodiversity. The wolf is a keystone species, driving trophic cascades that sustain ecosystem dynamics. As an apex predator, the wolf regulates prey populations, culls weak individuals, and influences prey behavior, thus, indirectly enhancing plant diversity and abundance. Post-kill, wolves facilitate scavenging by other carnivores. This is followed by insects that decompose remains, and finally, supporting avian insectivores. Wolves also suppress coyote populations, which, when unchecked, deplete rodent prey critical for raptors (e.g., hawks, eagles, owls). This suppression benefits foxes, which coexist with wolves. These top-down effects vary across ecosystems due to food web complexity, species diversity, and productivity.

Below is a comprehensive rewrite that weaves together the many ecological functions of wolves—from their role in trophic cascades and climate resilience to their fascinating social behaviors and animal culture:

Population Regulation and Habitat Health: Wolves play a critical role in controlling prey species such as deer, elk, and moose. By keeping these populations in check, wolves help prevent overbrowsing, which in turn allows forests, riparian zones, and grasslands to regenerate. This growth not only enhances biodiversity but also supports a broader range of wildlife—from songbirds to beavers. The ripple effect touches many facets of the ecosystem, supporting a balanced predator–prey dynamic that is vital for habitat stability.

Cascade Effects on Scavengers and Secondary Predators: When wolves hunt, they create opportunities for scavengers like bears, ravens, and eagles to feast on leftovers. In some cases, the presence of wolves even reduces the numbers of mesopredators such as coyotes, resulting in cascading benefits for other species, including an increase in the survival rates of species affected by coyote predation. This interconnected web of relationships illustrates how a predator’s influence extends well beyond its immediate kill

Enhancing Carbon Sequestration: By controlling large herbivore populations, wolves indirectly facilitate the regrowth of forests and other vegetation. Healthier and denser forests are better at sequestering carbon from the atmosphere—a small but significant contribution toward mitigating climate change.

Protecting Water Systems: Healthier vegetation along stream banks, encouraged by reduced grazing pressure, stabilizes waterways. Improved riparian areas help curb erosion and support water quality, demonstrating how the seemingly distant effects of predator–prey interactions can influence the hydrological cycle and climate resilience.

Adapting in a Changing World: Wolves are adaptable. As climate shifts and habitats transform, wolves adjust their ranges and hunting strategies. This flexibility not only

underscores their resilience but also helps maintain balanced ecosystems even as environmental conditions fluctuate. However that is not to take lightly that changes in global temperature will not affect rules the other part is yes we know that wolves are adaptable and can bounce back but they cannot bounce back from things they did not involve to be around like night vision electronic calls snowmobiles roads noise lights and honestly they're doing a pretty good job of being very tolerant much more than we are

Intricate Social Structures: Wolves live in closely knit packs that exhibit advanced social organization. Rather than operating on simple dominance hierarchies alone, many wolf packs share decision-making responsibilities among several key members. Roles within the pack extend from alphas, who lead hunts and breeding, to betas and omegas, who help mitigate social tensions and even contribute to innovative strategies during hunts.

Transmission of Learned Behaviors: Beyond instinctual actions, wolves demonstrate what many researchers describe as animal culture—behaviors that are learned and passed on within the pack. For instance, certain packs develop unique hunting techniques tailored to their local environment and prey. These strategies can be culturally transmitted, meaning that a pack's "tradition" affects how future generations approach hunting, territory marking, and even conflict resolution.

Social Bonding and Emotional Behaviors: Recent discoveries have revealed that wolves may exhibit behaviors akin to mourning after the loss of a pack member, a discovery that has fueled discussions on the depth of their social bonds. Additionally, evidence of play, conflict resolution, and even self-medication practices has emerged—indicating that wolves' actions are not solely genetically programmed but also learned and culturally adapted through social interactions.

Regional Nuances- From Wisconsin to Colorado: In Wisconsin, wolves have been documented as vital regulators of white-tailed deer populations, preventing overbrowsing and promoting forest regeneration. Their influence even extends to managing the populations of mesopredators like coyotes, indirectly supporting other species and contributing to a more balanced ecosystem. It may be true here in Wisconsin that we have so many whitetail deer that a thousand wolves can't really make a huge effect in trophic cascades. However, we need wolves at the absolute top carrying biological carrying capacity.

- **Potential in Varied Landscapes:** In areas such as Colorado, where human influence is stronger outside protected parks, the ecological effects of wolves can vary significantly. High, sustained wolf densities may trigger similar trophic cascades as seen in Yellowstone, but in regions with lower wolf presence or frequent human interference, these effects might be less pronounced.

Conclusion- Wolves as Multifaceted Ecosystem Engineers: The ecological role of wolves is a vibrant tapestry woven from predation, facilitation of vegetation and water health, impacts on climate resilience, and a rich social life that includes elements of animal culture. As new discoveries emerge—not only about how wolves coordinate hunts and care for their young but also about how they pass on learned behaviors and traditions—the picture of wolves becomes increasingly complex. Far from being mere hunters, wolves are dynamic influencers of their

ecosystems, playing a pivotal role in sustaining both biological diversity and environmental balance.

This modern view challenges us to consider wildlife management not simply in terms of numbers or hunting quotas, but as an intricate interplay of behaviors, traditions, and ecological functions that echo across the landscape. Whether studying the changes in a Wisconsin forest or the potential impacts of wolf restoration in Colorado, understanding these layered interactions offers a deeper connection to—and respect for—the natural world.

Legal and Policy Framework: Case for State Listing

Under the Endangered Species Act (ESA, 16 U.S.C. § 1532(6)), gray wolves are listed because they remain "in danger of extinction throughout all or a significant portion of [their] range". The 2022 court ruling (*Defenders of Wildlife v. USFWS*, 2022) and subsequent vacating of delisting efforts (Federal Register, 2022) reaffirmed that the threats—from human-induced mortality to habitat fragmentation—continue to merit robust protections. The state's Wolf Management Plan, currently under revision for 2023 (Wisconsin DNR, 2023b), relies on federal rules for enforcement; however, these protections can be compromised by future policy shifts. A state-level endangered species listing is therefore essential to ensure that even if federal protections are weakened or removed, gray wolves continue to benefit from strict, science-based management.

Gray wolves in Wisconsin are currently protected under the federal Endangered Species Act (ESA) as endangered, following a February 2022 court order that reinstated protections for wolves in the contiguous 48 states, except for the Northern Rocky Mountain population [Federal Register, 2023]. However, there is a compelling case for listing gray wolves on Wisconsin's state endangered species list to provide additional protections and management tailored to the state's specific ecological and social context. While federal protections offer a baseline, state-level listing could enhance conservation efforts by addressing local challenges that may not be fully met under the ESA alone.

Public Support and Misconceptions

Recent surveys consistently indicate strong public backing for wolf conservation. For example, a 2019 survey found that 82% of Wisconsinites support maintaining or increasing wolf populations. Additionally, during the 2023 DNR public comment period, over 3,500 responses were received, with 65% of respondents calling for enhanced protection measures. These results reflect a broad consensus in favor of conservation, particularly among urban and suburban inhabitants—groups that constitute roughly 70% of Wisconsin's population.
Several misconceptions contribute to opposition against wolf protection:

- Despite concerns regarding interactions between wolves and domestic dogs, data reveal that only about 0.01% of Wisconsin's two million domestic dogs are involved in such incidents on an annual basis.
- While livestock depredation remains a concern for 20 out of 64,000 farms, the implementation of robust compensation programs covers 110% of verified losses. As a result, the overall economic impact on the livestock industry is minimal when viewed in the context of the larger economic frame.
- Empirical studies have repeatedly demonstrated that zoned hunting does not effectively reduce human-wolf conflicts; in some cases, it even exacerbates them. A study conducted in 2016 reported that targeted hunting interventions were associated with a 10% increase in livestock predation, likely due to disturbances in stable pack structures. Further research in leading ecological journals indicates that the removal of alpha individuals can scatter pack members, elevate stress levels, and consequently contribute to higher instances of human-wildlife conflict.
- The repercussions of zoned hunting extend beyond immediate population declines. Specifically, the targeted removal of breeding females and alpha wolves disrupts pack cohesion and undermines reproductive success. This fragmentation of wolf packs is linked to imbalances in deer predation dynamics which, in turn, affect forest regeneration and compromise vital ecosystem services.

- **Stakeholder Support- Wisconsin's Endangered Resources:** License plates, funding conservation for over 30 years, demonstrate public pride and support for protecting species like the gray wolf (Endangered Resources License Plates). These plates have been vital, with revenues accounting for up to 40% of endangered species funding in some years available since 1994, fund the DNR’s conservation efforts for over 400 wildlife and 300 plant species listed as endangered, threatened, or special concern (Endangered Resources License Plates). These plates, featuring designs like the bald eagle and gray wolf, have raised significant funds, accounting for up to 40% of endangered species funding in some years. Recent initiatives, such as a $25 rebate offer in 2024 to celebrate 30 years, highlight their popularity and public pride in supporting conservation (DNR Offering $25 Rebate). This public commitment underscores widespread support for protecting species like the gray wolf, aligning with the petition’s goals.

- **NCEL and Bipartisan Lawmakers:** The National Caucus of Environmental Legislators (NCEL), a bipartisan group, has long advocated for state-level protections for endangered species, supporting initiatives like this petition (National Caucus of Environmental Legislators). Bipartisan lawmakers in Wisconsin recognize the need for state autonomy in managing wildlife, especially with federal support waning. Additionally, the Wisconsin

Farmers Union, while historically favoring delisting, has expressed confidence in the state's ability to manage wolf populations effectively, balancing conservation with agricultural needs.The petition has garnered support from the National Caucus of Environmental Legislators (NCEL), a bipartisan group of over 1,000 state legislators from all 50 states, committed to environmental protection (National Caucus of Environmental Legislators). NCEL advocates for state-level protections for endangered species, recognizing states as chief stewards for wildlife within their borders. Their resources, such as articles on state endangered species acts, emphasize the importance of state action when federal support wanes (State Protections for Endangered Species). This aligns with the petition's goal of state listing to fill federal gaps.Bipartisan support for wolf management is evident from recent legislative efforts. For instance, in 2024, both Republican and Democratic lawmakers in Wisconsin have introduced bills related to wolf management, reflecting a shared recognition of state autonomy (House Votes to Remove Wolves From Endangered List). This bipartisan approach underscores the petition's broad appeal, ensuring state-led conservation efforts are inclusive and science-based.

- **Wisconsin Farmers Union- Trust in State Agency:** The Wisconsin Farmers Union (WFU) has approximately 2,200 Farm members, representing 28 local chapters. These members are also members of the National Farmers Union. NFU represents over 220,000 family farmers and ranchers in 33 states through 24 state and regional divisions.

  The Wisconsin Farmers Union, representing family farmers, has historically supported delisting the gray wolf to allow state management, including hunting, due to concerns. While their stance differs from listing as endangered, they have engaged in discussions on state management, expressing the need for effective policies to protect livestock. The petition's focus on science-based state management ensures a balanced approach, addressing farmers' concerns and fostering renewed trust in the DNR's ability to manage wolf populations effectively, especially amidst federal budget cuts**.** The petition's urgency is amplified by cuts in the 2025 reconciliation bill, affecting ecological services and livestock programs. For instance, the cancellation of the **Climate Smart Commodities Program and reductions in USDA initiatives like Local Food Purchase Assistance (LFPA)** strain farmers, potentially leaving them without compensation for wolf depredation The petition notes, "you will be paying for wolf hunting and the farmers will get nothing because there won't be enough money in the pool," reflecting economic pressures on agricultural communities, which state listing aims to address through balanced management**.**

Current Federal Protections: Case for State Listing

As of February 2022, gray wolves in Wisconsin regained endangered status under the ESA, prohibiting harvest and providing federal oversight for their recovery [Federal Register, 2023]. This status ensures a level of protection, but it relies heavily on federal resources and priorities, which may not align perfectly with Wisconsin's unique needs. State-level listing would empower the Wisconsin Department of Natural Resources (DNR) to implement more localized management strategies, secure state-specific funding, and enact regulations that complement federal efforts. Given the concerns about deteriorating support structures for wolf conservation in Wisconsin, state listing could serve as a critical safeguard.

State Wolf Management Plan: Progress and Gaps

The Wisconsin DNR updated its wolf management plan (Wisconsin Department of Natural Resources, 2023). However, its success is jeopardized by significant gaps, including critical losses in interagency collaboration, vanishing funding resources, loss of scientific expertise, and inadequate regulatory mechanisms.

The Management Approach Hinges on Several Core Strategies: Following federal delisting of wolves in January of 2012, the state legislature passed 2011 Wisconsin Act 169 which in part directed the department to continue providing damage compensation for death or injury caused by wolves to livestock, to hunting dogs other than those being actively used in the hunting of wolves, and to pets. However, unlike the previous wolf compensation program, funding for damage compensation comes from the sale of wolf hunting/trapping applications and license sales when wolves are not listed as threatened or endangered at the state or federal level. If the funding generated from wolf hunting application and license sales is not sufficient to pay for all wolf depredation claims in a given year, each claim is prorated according to available funding. Through proration, claimants receive a percentage of the compensation they are eligible for. In the first three years of the new funding source, revenue was sufficient to pay for all wolf claims.

Along with the change in funding sources for wolf damage payments, the department wolf damage management and wolf damage compensation programs transitioned from the Bureau of Endangered Resources to the Bureau of Wildlife Management, the latter of which continues to administer the program today. adaptive management framework for wolf harvest does not hinge on a single, static numerical threshold that designates the species as endangered or threatened. Instead, the state relies on a dynamic process where management zones are defined geographically, and regulations are flexibly adjusted based on continuous scientific monitoring and population assessments. Under state law, wolf hunting and trapping occur during an annual open season—from the first Saturday in November until the last day of February—with the DNR empowered to close specific zones early if harvest quotas are reached or if data indicates that wolf numbers could soon be unsustainably low. This responsive approach emphasizes real-time adaptation rather than locking in on a predetermined figure that triggers a change in legal status.

Zone hunting, in this context, provides a well-considered balance between satisfying the interests of hunters and ensuring ecological sustainability. By dividing the state into distinct management areas, the Wisconsin Department of Natural Resources can target regulations where they are most needed. Hunters benefit from clearly delineated zones that offer regulated opportunities for pursuing wolves, often stimulating a sense of strategic challenge and regional pride. At the same time, these adaptive zones allow wildlife managers to mitigate the pressure on wolf populations by adjusting harvesting limits in response to observed trends, rather than relying on a generic numerical benchmark to declare a species endangered. This system ensures that local conditions—such as seasonal behavior patterns, predator-prey dynamics, and habitat characteristics—play a crucial role in determining when and where harvest pressure should be relaxed or intensified.

Furthermore, the absence of a fixed figure in the adaptive management approach underscores a commitment to data-driven decision-making rather than rigid classification. In many regulatory

systems, a singular population level might be used to trigger protective status under the Endangered Species Act. However, in Wisconsin, the state's wolf management plan is designed to work within a framework where federal listings and state management directives intersect. Even though wolves may be federally classified as endangered or threatened based on broader evaluations, state law mandates that a wolf harvest season is maintained as long as wolves are not designated at the state level as endangered or threatened. This legal nuance means that, rather than selecting an arbitrary number that signals a tipping point, the management process continuously evaluates the health and sustainability of wolf populations through intensive monitoring and collaborative research efforts.

Ultimately, this nuanced system delivers hunter satisfaction by providing a structured yet flexible harvest strategy that responds to real-time ecological feedback. Hunters are afforded opportunities to participate in regulated, sport-based pursuits that honor longstanding cultural traditions, while state authorities maintain rigorous oversight to protect the species and its role within the ecosystem. The concept of adaptive management, particularly when applied to zone hunting, epitomizes a balanced negotiation between human interests and wildlife conservation—a model that continually seeks to enhance both the hunting experience and long-term species viability.

Compensation without protection: Following federal delisting in January 2012, Wisconsin Act 169 directed the department to continue damage compensation for wolf-caused death or injury to livestock, hunting dogs (not actively hunting wolves), and pets. Unlike the previous program, funding now comes from wolf hunting/trapping applications and license sales when wolves are not state or federally listed as threatened or endangered. If this funding is insufficient, claims are prorated. In the first three years, revenue covered all claims. Additionally, program administration shifted from the Bureau of Endangered Resources to the Bureau of Wildlife Management. The 2021 hunt license fees generated $400,000.

Population Monitoring: Utilizes annual overwinter surveys integrating snow tracking, radio telemetry, and validated public sightings. These methods, however, are increasingly compromised by equipment malfunctions and reduced field personnel. A recent switch to a new population modeling method is unreliable and based on assumptions.

Conflict Mitigation: Initiatives include non-lethal deterrents such as fladry (flagged fencing), deployment of guard dogs, and financial compensation programs for livestock losses, which currently amount to approximately annually.

Managing wolves for hunter satisfaction is not supported by scientific evidence. Both Minnesota and Michigan state that wolf hunting does not help depredation, a position contrary to the practice of using hunting as a management tool. They assert this as a fact, based on their respective research and management approaches. In select regions experiencing heightened conflict, the authorization of limited and geographically defined hunting is in effect.

Nevertheless, scholarly investigations subjected to peer review indicate the potential for such zonal hunting practices to intensify conflict scenarios. This intensification may result from the disturbance of pack hierarchical structures and the alteration of inherent predator-prey interaction patterns. It is noteworthy that the designated hunting zones were not established by the inaugural wolf management committee, but rather were modified within the subsequent wolf management plan. This alteration occurred notwithstanding substantial public opposition, as reflected in numerous public comments expressing explicit disapproval of the proposed zones.

The utilization of wolf management strategies predicated on the satisfaction of hunting interests lacks a basis in established scientific methodology. Both the states of Minnesota and Michigan

have formally recognized that such a basis is absent. Furthermore, these states have articulated a position that stands in direct contrast to the notion of hunter satisfaction as a legitimate scientific principle. The proposition that zoned hunting may exacerbate conflicts by disrupting pack structures and altering natural predation dynamics is substantiated by peer-reviewed studies. The establishment of these zones lacked the endorsement of the original wolf management committee and was subsequently implemented through revisions to the wolf management plan, disregarding the prevalent public disapproval expressed in official commentary. The management of wolf populations for the purpose of satisfying hunter expectations is not supported by empirical scientific data. The states of Minnesota and Michigan maintain that wolf hunting does not contribute to the mitigation of depredation, a stance which diverges significantly from the employment of hunting as an instrument of population management. This position is asserted as an objective fact, derived from the individual states' respective research undertakings and adopted management strategies.

Interagency Collaboration- A Critical Loss: Historically, wolf management in Wisconsin benefited from collaboration between the Wisconsin DNR, the U.S. Fish and Wildlife Service (USFWS), USDA-Wildlife Services, and tribal agencies. This partnership facilitated data sharing, population monitoring, and conflict resolution. The noted absence of this interagency collaboration could disrupt coordinated efforts. For instance, the DNR's current partnership with USDA-Wildlife Services to address wolf depredation relies on federal support [Wisconsin DNR, 2023]. If this collaboration has weakened—perhaps due to shifts in federal priorities or resource allocation—Wisconsin may struggle to maintain consistent monitoring and management. State listing of the wolf could compel the DNR to establish or restore these partnerships, potentially through state-led initiatives, ensuring a unified approach to wolf conservation.

Funding- A Vanishing Resource: Adequate funding is essential for wolf conservation, supporting population surveys, habitat management, and public education. The highlighted lack of funding could severely limit the DNR's capacity to implement the 2023 wolf management plan. Historically, federal ESA listing brought funding through grants and cooperative agreements, but state-level efforts often rely on state budgets or external contributions. For example, the DNR's wolf monitoring has depended on a mix of state and federal resources, but cuts or reallocations could reduce staff, equipment, and research capabilities [Wisconsin DNR, 2023]. State listing could unlock dedicated state funding streams, such as those tied to endangered species programs, and signal a commitment to wolf recovery that attracts additional grants or donations.

The Forest Service: Michael Boren, the founder of a billion-dollar tech company, an Idaho ranch owner and a Trump donor, is Trump's nominee to oversee the very agency he has tussled with over his decision to build on protected land.

I am Dr., a former federal biologist specializing in wildlife conservation. My research focused on maintaining ecological stability through evidence-based management, particularly concerning bear populations. When I presented comprehensive data advocating for sustainable policies and transparent environmental monitoring, the science was clear. Yet, policymakers disregarded empirical findings, allowing implicit bias to distort decision-making.

Bias undermines scientific integrity, enabling misinformation to shape policy. Despite my credentials and expertise, my research was dismissed in favor of narratives crafted by individuals lacking scientific training. These accounts, rooted in prejudice, framed bears as threats and positioned me as an outsider, using coded language to erode confidence in my work.

Scientific inquiry benefits from diverse perspectives. As a Black woman in federal wildlife management, I brought an expanded worldview informed by interdisciplinary research and historical land stewardship practices. My approach integrated ecological science with sustainable land-use strategies, challenging entrenched assumptions that prioritized short-term interests over long-term environmental health. With bear populations affected by habitat loss, climate stressors, and human-wildlife interactions, I examined predator-prey relationships, ecological carrying capacity, and Indigenous conservation practices to develop a balanced framework. My perspective differed from prevailing models that favored economic incentives over ecosystem resilience.

In public meetings, my analysis was repeatedly interrupted, my findings labeled "too emotional." My proposals were initially ignored, only to be accepted when later presented by male colleagues. Institutional bias prioritized conjecture over empirical data, resulting in policies that ignored documented ecological risks. Warnings of habitat degradation, disrupted food chains, and declining bear populations were formally recorded but dismissed.

Environmental conditions deteriorated, yet leadership framed the decline as “natural fluctuations.” However, local stakeholders—including Indigenous leaders, researchers, and conservationists—demanded independent audits. The data was indisputable: mismanagement had destabilized the ecosystem. The findings previously ignored now aligned with observable reality, prompting further scrutiny.

Investigations exposed systemic issues. Predictions of economic benefits proved baseless—no jobs materialized, and costs soared. Public records revealed undisclosed affiliations between policymakers and industry lobbyists, highlighting conflicts of interest. As the community recognized the impact of bias-driven governance, these individuals lost credibility.

Eventually, federal intervention imposed emergency conservation measures and launched formal inquiries. Key officials resigned, while others were removed through public action. Confronted with the failures of previous policies, leadership adopted a revised framework rooted in scientific data—regulated resource management, habitat monitoring, and ecological restoration. This was not an ideological shift but a necessary correction based on evidence.

Ultimately, objective data prevailed over bias and misinformation. Conservation efforts secured long-term sustainability, underscoring the importance of evidence-based policy. Once sidelined by systemic barriers, I was vindicated—not because of my identity, but because the science was irrefutable. Justice, like the land itself, proved enduring.

Equitable Stakeholder Engagement: Decision-making processes for wolf management must be intentionally inclusive, actively seeking out and valuing the perspectives of diverse stakeholders. This includes not only traditional hunting and agricultural interests but also conservation groups, wildlife advocates, rural residents (both those who experience conflict and

those who value wolves), urban populations who support conservation through taxes and tourism, and communities of color whose voices have often been underrepresented in environmental policy.

Addressing Disproportionate Impacts: State management plans must assess and mitigate any potential disproportionate negative impacts of wolf presence or management actions on vulnerable communities. This includes ensuring equitable access to conflict prevention resources, fair and timely compensation for losses, and considering the socio-economic effects of management decisions on local livelihoods.

Promoting Inclusive Benefits from Conservation: The ecological and economic benefits of wolf recovery (e.g., healthier ecosystems, hunting ecotourism opportunities) should be distributed equitably. State-led efforts can explore ways to ensure that local communities, including tribal nations, directly benefit from wolf conservation initiatives.

Transparency and Accessibility: All information related to wolf management, scientific data, and decision-making processes must be made transparent and accessible to all Wisconsinites, utilizing various communication channels to reach diverse audiences and overcome potential barriers to participation. Wisconsin can create a wolf management paradigm that is not only ecologically sound and economically viable but also socially just and broadly supported, rectifying past inequities and building a more robust recovery for endangered and threatened species.

Loss of Scientific Expertise: The dismissal of scientists could undermine wolf management by depleting institutional knowledge and research capacity. While specific instances are not detailed in public records, the loss of a key wolf researcher or expert within the DNR or affiliated institutions could disrupt ongoing studies, such as population estimates or behavioral research critical to the 2023 plan. Wisconsin's wolf population, estimated at around 1,000 individuals in recent years, requires consistent scientific oversight to assess recovery and threats [Wisconsin DNR, 2023]. State listing could prioritize the retention and recruitment of scientific expertise by tying wolf conservation to a legally protected status, ensuring that management decisions remain evidence-based.

Inadequate Regulatory Mechanisms: There are "no adequate regulatory mechanisms," pointing to potential weaknesses in Wisconsin's framework for protecting wolves. Under federal ESA protection, harvest is prohibited, and the DNR collaborates with USDA-Wildlife Services to manage conflicts, such as livestock depredation [Wisconsin DNR, 2023]. However, if wolves were delisted federally, the 2023 state plan would govern management, relying on state regulations that may lack enforceability or specificity. Past controversies, like the 2021 wolf hunt that exceeded quotas, suggest that Wisconsin's regulatory mechanisms can falter without robust oversight [Milwaukee Journal Sentinel, 2021]. State listing would establish a legal mandate for protective regulations, potentially including stricter harvest controls, habitat protections, and enforcement measures, addressing gaps that federal listing alone may not cover. Additionally, the ninth circuit Court ruled that relisting and emergency listing are not adequate regulatory mechanisms.

State Endangered or Threatened Listing for Wolves Must Be Accompanied by a Commitment to Tribal Engagement: *Bad River Reservation, where the forests, ancient secrets and the rivers sing to the land, I, a young woman in my early twenties, sat by my grandfather's side, soaking in stories that felt older than time itself. My grandfather, Joe Rose—Moka'ang Giizis, "Morning Sun" in our language—was more than just an elder; he was a living bridge to our past, a keeper of our ways. His voice, though soft, carried the weight of generations, and his eyes sparkled with the wisdom of countless moons. To me, he was everything—a teacher, a guide, and a friend. But above all, he was a protector of our sacred bond with the Ma'iingan, the wolves. Learning from Grandfather "Long ago," he would say, his voice weaving through the crackling firelight, "when our people were new to this land, the Great Spirit sent the wolves to guide us. They taught us how to hunt, how to survive, and in return, we promised to honor them as kin. The Ma'iingan are not just animals, they are family." His words painted pictures in my mind: wolves running alongside our ancestors, their howls blending with the songs of our people, their spirits intertwined with ours. I believed him, not just because he was my grandfather, but because I felt it too. The wolves were part of us, their presence a quiet strength in the land we called home.*

Joe Rose had taught me many things about our culture—the importance of the seven grandfather teachings, the significance of the pipe, and the sacredness of the land. But nothing had prepared me for the depth of his love for the wolves. He shared stories of how the wolves were our teachers, our protectors, and how their howls were like prayers to the Great Spirit. I remember one evening, as we sat by the river, he looked at me and said, "Giga-waabamigoo," which means "I will see you again," but in that moment, it felt like a promise that extended beyond this life, a vow to protect what we held dear.The Shadow of the Hunt. But in 2021, that bond was tested in ways none of us could have imagined. The state of Wisconsin, swayed by voices louder than ours, decided to open a hunting season for wolves. It was a decision that felt like a betrayal, not just to us, but to the very earth we stood on. My grandfather, along with other elders, fought against it. He traveled to hearings, his frail body carrying the weight of our history, and spoke with a clarity that silenced rooms.

At one meeting, he shared the story of how the Anishinaabe and Ma'iingan became brothers, warning that to harm the wolves was to invite misfortune upon all. His words were powerful, but they were not enough. The hunt was approved, and with it, a shadow fell over our reservation. I remember the day the hunt was announced. At school, my friends talked excitedly about it. "It's just wolves," one said, shrugging. "They're dangerous, killing livestock and stuff." Another added, "It's not like they're people." Their words stung, but I didn't argue. How could I explain what it meant to lose something so sacred? How could I make them see that the wolves weren't just animals—they were part of who we were? I kept my silence, but inside, I burned with anger and fear. And then there was Grandfather. He didn't speak much after the hunt was announced, but his silence was louder than any words. His eyes, once so full of life, grew distant, as if he were watching something unfold that only he could see.The hunt lasted only three days, but it felt like an eternity When the season ended, 218 wolves had been killed—nearly double the quota. Entire packs were gone, their howls silenced forever. The land felt emptier, the air quieter. And Grandfather… he began to fade. His health, already weakened by age, seemed to crumble under the weight of his grief. He spent his days by the window, staring into the forest, as if waiting for the wolves to return. "They're gone," he whispered one evening, his voice barely audible. "Our brothers are gone." I tried to comfort him, bringing him soup, sitting with him as he

gazed into the distance. But nothing helped. His heart, once so strong, was breaking. "I'm not hungry, my dear," he would say, turning away from the food. "My heart is too heavy." I held his hand, tears streaming down my face. "I miss them too, Grandfather," I whispered. "The wolves… they were part of our family." He looked at me then, his eyes filled with a sadness I couldn't bear. "They still are," he said softly. "In our hearts, they will always be with us. But we must fight for them, even when I'm gone." Those words haunted me. I didn't want to think about him being gone, but as the weeks passed, it became clear that he was slipping away. The hunt had taken more than just the wolves—it had taken a piece of him, a piece of all of us.

On a cold November night, as snow began to fall, Grandfather closed his eyes for the last time. His spirit, I knew, had joined the Ma'iingan, running free in the forests beyond our sight. But for me, for all of us, the loss was unbearable. Carrying on the tribe gathered to honor him, our drums beating a solemn rhythm, our songs carrying his name to the heavens. Elders spoke of his wisdom, his love for the land, his unwavering commitment to our ways. And then it was my turn. I stood before them, my voice trembling but determined. "Grandfather taught me that we are relatives to animals. He fought for them until the end, and now it's our turn to carry on his fight. We must protect our brothers, the Ma'iingan, for they are part of who we are." As I spoke, I felt a warmth in my heart, a quiet strength that told me Grandfather was with me, guiding me as the wolves had guided our people long ago. After the ceremony, I walked alone into the woods, seeking solace. The air was crisp, and the trees stood silent, as if mourning with me. I sat by a stream, listening to its gentle flow. Suddenly, a sound pierced the stillness—a distant howl, faint but clear. My heart leaped. It was a wolf, calling out to its pack that would never return. Tears filled my eyes as I realized that the Ma'iingan were still there, still singing their ancient sad songs. And in that moment, I knew that Grandfather's spirit was with them, watching over me, guiding my path. I stood up, determined in my step, ready to honor his memory by protecting what he loved most. The fight wasn't over—it had only just begun.

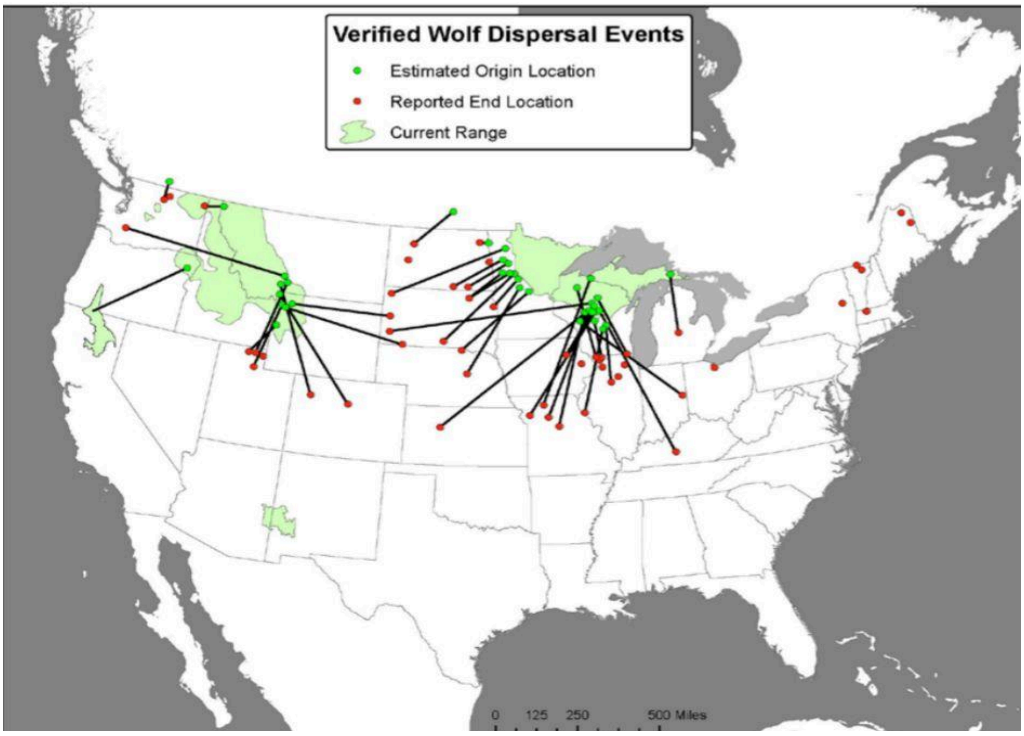
Formal Recognition and Incorporation of Tribal Indigenous Rights and Perspectives: Incorporating tribal indigenous rights into wildlife conservation is vital. The indigenous tribes of Wisconsin, whose ancestral lands, cultural narratives, histories, and spiritual practices are deeply intertwined with the story of the gray wolf, offer a rich legacy of stewardship and ecological insight. A state-level wolf listing is a crucial mechanism for formally recognizing, affirming, and upholding the federally recognized treaty rights of these sovereign nations. It mandates sustained government-to-government engagement with tribal nations in every aspect of wolf management, respecting their inherent sovereignty while blending TEK with Western scientific approaches. State wolf management in Wisconsin must function on a genuine government-to-government basis with the state's sovereign tribal nations. This means engaging in robust, meaningful, and ongoing consultation that upholds treaty-protected rights related to wolves and their habitat. The cultural and spiritual significance of the wolf to tribes such as the Ojibwe, Menominee, and Ho-Chunk must remain central to management planning. It is imperative that Traditional Ecological Knowledge (TEK) be respectfully integrated with Western scientific methods. By establishing a state-level listing, Wisconsin gains a stronger platform to meet these obligations regardless of the variability in federal consultation practices.

A fundamental restructuring of state wolf management in Wisconsin is essential to ensure true government-to-government relations with the sovereign tribal nations residing within its boundaries. This necessitates the establishment of a framework for robust, meaningful, and

consistent consultations. These consultations must be ongoing, not merely reactive, and must fully respect and uphold the treaty-protected rights afforded to tribes concerning wolves and their natural habitat.

The management strategies employed by the state must be deeply informed by and respectful of the profound cultural and spiritual significance that wolves hold for tribes such as the Ojibwe, Menominee, and Ho-Chunk Nations. These perspectives cannot be mere footnotes in the decision-making process but must be central pillars upon which management plans are constructed. The invaluable knowledge encapsulated in Traditional Ecological Knowledge (TEK) must be treated with the utmost respect and deliberately integrated into management practices alongside established Western scientific methods. This synergistic approach ensures a holistic understanding of wolf populations and their ecological roles.

Furthermore, by enacting a state-level listing of wolves, Wisconsin would create a more stable and robust foundation for fulfilling its obligations to tribal nations. This state-level listing provides a crucial buffer against the fluctuating nature of federal consultation practices, ensuring that the state's commitments to its tribal partners are consistently met regardless of shifting federal policies or priorities. This stability is key to building and maintaining trust and fostering effective partnerships between the state and tribal governments in the long-term management of this vital species.



Wolf Dispersal and Habitat Potential

Wolves are known for their expansive dispersal capabilities, frequently crossing state and even international boundaries. Evidence suggests that wolves from Wisconsin have been documented as far afield as Wyoming and Missouri, underscoring the species' potential for further range expansion if suitable corridors are maintained. This natural propensity for movement stresses the need for management strategies that are as adaptable and dynamic as the species itself.

Opportunities for Habitat Connectivity: Maintaining and establishing ecological corridors is essential.

- **Corridor Development:** Identifying and protecting connectivity zones will facilitate genetic exchange and population resilience.
- **Recolonization Potential:** Areas currently under agricultural or fragmented use may be repurposed or managed for conservation, thereby providing new habitats for wolf dispersal and long-term recovery.

Wolves Benefits: Case for State Listing

Wisconsin stands at a crossroads in its stewardship of the gray wolf, a species whose recovery symbolizes both the triumphs and challenges of conservation. By listing wolves as threatened on the state's endangered and threatened species list, Wisconsin can secure a host of benefits: full management authority over wolves as it once had, access to a robust toolbox for farmers and coexistence, potential increases in funding, and a legal shield against congressional overreach. This move would also uphold judicial review, the best available science, and constitutional principles—values Wisconsin holds dear—ensuring that wolf management reflects

the will of the people rather than arbitrary or dangerous decisions from unchecked powers. The gray wolf (*Canis lupus*), an apex predator and keystone species, plays a vital role in maintaining Wisconsin's ecological balance. Its presence regulates prey populations, prevents habitat degradation, and supports biodiversity.

However, growing threats—including federal regulatory rollbacks, inadequate state management, and habitat fragmentation—jeopardize its long-term viability. Federal conservation measures have eroded in recent years, with agencies like the U.S. Fish and Wildlife Service (USFWS) and the U.S. Geological Survey (USGS) facing budgetary constraints that hinder their capacity to enforce protective statutes and conduct rigorous scientific monitoring. Without intervention, these cuts reduce the ability of regulatory bodies to implement long-term conservation strategies grounded in the best available science. In response to these vulnerabilities, this petition urges the Wisconsin Department of Natural Resources (DNR) to designate the gray wolf as an **endangered or threatened species** under the Wisconsin Endangered and Threatened Species Act (WETSA).

Full Management Authority Restored: Historically, Wisconsin enjoyed significant control over wolf management during periods when wolves were delisted from the federal Endangered Species Act (ESA), such as before their 2022 relisting as endangered. Listing wolves as endangered or threatened at the state level would restore this authority, even with federal protections in place.
Under state law, Wisconsin's Department of Natural Resources (DNR) could craft and enforce a management plan tailored to local needs—setting population goals, regulating hunting (if deemed sustainable), and protecting critical habitats like denning sites. This mirrors the autonomy the state exercised previously, allowing decisions to reflect Wisconsin's unique ecological and social landscape rather than a one-size-fits-all federal approach.

A Toolbox for Farmers and Coexistence: A state listing unlocks a comprehensive set of tools to support farmers and promote coexistence with wolves. The DNR could expand non-lethal deterrents—such as fencing, guard animals, or flashing lights—proven to reduce livestock losses more cost-effectively than hunting. Compensation programs for affected farmers could be strengthened, ensuring fair reimbursement for losses without resorting to lethal control. These measures, grounded in practical solutions, address the real concerns of rural communities while preserving wolf populations. Unlike the federal framework, which can be rigid, state management offers flexibility to adapt these tools to Wisconsin's specific agricultural context, fostering harmony between humans and wolves.

Wisconsin's Conservation Legacy: The petition aligns with Wisconsin's conservation heritage, rooted in Aldo Leopold's land ethic, emphasizing humanity's responsibility to nature. As the birthplace of conservation, Wisconsin is positioned to lead by example, showing the nation how state-led action can protect keystone species like the gray wolf, especially in the face of federal failures and budget cuts.

Potential Funding Boost: Beyond the immediate tools, listing wolves as endangered or threatened could open doors to additional funding. State-listed species often qualify for conservation grants from state coffers, federal programs, or private foundations—resources that might not be available under federal listing alone. These funds could bankroll research,

monitoring, and coexistence initiatives, reducing the financial burden on Wisconsin's already strained budget. More money means more support for farmers, better science to guide decisions, and a stronger safety net for wolves—a win for all stakeholders.

Legal Protections Against Congressional Delisting: Perhaps the most critical benefit is the legal bulwark a state listing provides against congressional meddling. Wolves have been caught in a political tug-of-war, with Congress at times pushing to delist them from the ESA without judicial review or adherence to the best available science. A prime example: the 2020 federal delisting, overturned in 2022, which led to the disastrous 2021 Wisconsin wolf hunt—218 wolves killed in days, nearly double the sustainable quota. Congressional delisting strips away checks and balances, leaving wolves vulnerable to decisions that defy ecological reality and public input. By listing wolves as endangered or threatened at the state level, Wisconsin creates an independent layer of protection. Even if federal status changes, state law would ensure wolves remain safeguarded, with management decisions subject to judicial oversight and scientific rigor—not the whims of Washington.

Upholding Constitutional Principles: Wisconsin's belief in the Constitution shines through in this approach. A state listing preserves the power of the people to challenge unconstitutional, arbitrary, or capricious decisions—whether from agencies, the executive branch, or Congress. Without state protections, congressional delisting offers no avenue for judicial review, no mandate for science-based policy, and no checks on power. The 2021 hunt, a fallout of such unchecked authority, disrupted wolf packs and squandered conservation gains, proving the danger of this vacuum. A state listing ensures decisions about wolves are transparent, accountable, and contestable in court, aligning with constitutional values of due process and balanced governance. This reinforces the central argument about federal inadequacy driving the need for state action and highlights how state listing can address these specific gaps.

Strengthening Wisconsin's Wolf Conservation Amid Federal Budget Cuts

Federal budget cuts under the current administration have significantly undermined wildlife conservation efforts, reducing the capacity of agencies like the U.S. Fish and Wildlife Service (USFWS) and U.S. Geological Survey (USGS) to support wolf management and broader ecological programs. For Wisconsin, these cuts necessitate a proactive, state-led response to protect the gray wolf and other wildlife. This requires a comprehensive strategy addressing key areas:

Training DNR Staff for New Responsibilities: With federal support diminished, Wisconsin's DNR must take on expanded roles in wolf management. This requires dedicated training programs, including:

- **Non-lethal & lethal conflict resolution:** Techniques like fladry, guard animals, and noise deterrents to reduce livestock-wolf conflicts. Currently, Wisconsin often contracts out to Avis Wildlife Services for such conflict resolution, but this service is at risk of elimination. A proposal of $3.7 million for fencing is in the governor's budget, which is more funding than previously available livestock demonstration grants.
- **Population monitoring:** Skills for tracking wolf numbers and health without federal assistance.
- **Habitat management:** Assessing and restoring critical wolf habitats like denning sites. Training should begin within six months and be ongoing, ensuring staff are equipped to handle these responsibilities effectively.

Exploring Alternative Funding Sources: The loss of federal funding threatens wolf monitoring, research, and coexistence efforts. Wisconsin can offset this by:

- **State grants:** Allocate revenue from hunting and fishing licenses to endangered resources wolf programs.
- **Private donations:** Launch public campaigns to tap into support from conservation enthusiasts.
- **Nonprofit partnerships:** Secure grants or resources from groups like Defenders of Wildlife. These efforts can sustain wolf conservation while reducing reliance on federal dollars. State listing would unlock resources through the Endangered Resources initiative, a program funded by voluntary tax contributions and specialty license plate sales, which has historically bolstered conservation efforts (Wisconsin's Endangered Resources Program). These funds could support population monitoring, livestock conflict resolution (e.g., over $100,000 paid in 2022 for wolf-related losses), and habitat management, offsetting declines in federal assistance from agencies like the U.S. Fish and Wildlife Service (USFWS).

Assessing Damage to All Wildlife Conservation: The administration's cuts extend beyond wolves, jeopardizing Wisconsin's broader wildlife conservation framework. Species like the Karner blue butterfly and whooping crane, along with habitat restoration programs, face increased risks. Wisconsin should:

- Conduct a statewide impact assessment to identify vulnerable species and ecosystems.
- Prioritize state resources to mitigate the most pressing losses. This assessment, completed within a year, will guide strategic responses to the federal shortfall. **Engaging**

in New Partnerships: The decline in federal scientific research and funding demands new alliances to maintain evidence-based wolf management. Wisconsin should partner with:

- **Universities:** Leverage research expertise from institutions like the University of Wisconsin.
- **Tribal nations:** Integrate traditional ecological knowledge from groups like the Ojibwe.
- **NGOs:** Collaborate with organizations like the Nature Conservancy for data and support.

These partnerships can fill research gaps and enhance conservation outcomes. The Great Lakes Wolves Quality Assurance Oversight Committee (GLWQAC) is a collaborative initiative led by the Midwest Alliance of Sovereign Tribes (MAST) and the Union of Concerned Scientists (UCS), dedicated to ensuring the sustainable management and conservation of wolf populations in the Great Lakes region. The committee operates independently, free from lobbyist influence, and integrates a multidisciplinary panel of experts in health, climate, biodiversity, sociology, economics, ethics, and political science with a focus on democratic governance. The GLWQAC provides evidence-based oversight and policy recommendations to protect gray wolf populations (*Canis lupus*) while balancing ecological integrity, cultural significance, and human interests across the Great Lakes states (Michigan, Wisconsin, Minnesota, and parts of Ontario). It evaluates management plans, monitors population health, and assesses socio-economic and environmental impacts to ensure decisions align with scientific rigor, Indigenous knowledge, and democratic principles.

Increasing Local and State Public Input: Wolf management must reflect Wisconsin's diverse community perspectives. To achieve this:

- **Town halls and online forums:** Facilitate discussions among farmers, hunters, and conservationists.
- **Public surveys:** Regularly assess attitudes toward wolves and management strategies.
- **Advisory council:** Form a group with local, state, and tribal representatives to shape policy. Increased engagement ensures policies align with both ecological needs and public values.

Ensuring Independent Review: Wisconsin's conservation plans require objective oversight to remain effective. An independent review panel, including academics, tribal leaders, and conservation experts, should:

- Evaluate plans every two years for scientific integrity and feasibility.
- Publish findings to maintain transparency. This process guarantees that wolf management adapts to changing conditions and retains public trust.

Certifying Updated Conservation Plans: To reflect the lack of federal teamwork, Wisconsin must update and certify its conservation strategies. This involves:

- **Revising plans:** Detail how the state compensates for lost federal monitoring and funding.
- **Certification process:** Issue a public report within 18 months, outlining new approaches.

Community Wolf Solutions: A Better Approach to Compensation

A crucial element in mitigating human–wolf conflicts is shifting the focus toward direct support for affected communities. **Community Wolf Solutions** centers on compensating farmers and assisting with the installation of protective fencing. This approach not only addresses immediate economic losses but also creates a safer, more resilient barrier against wildlife damage.

In contrast, current compensation practices that include hound hunters have not proven effective. Despite their inclusion in some programs, hound hunters have not demonstrated improved tolerance toward wolves. Their continued participation perpetuates conflict rather than fostering coexistence—and by removing hound hunters from these compensation schemes, taxpayers could save over $1.7 million. This redirection of funds would allow more resources to be invested in protective measures that directly benefit farmers, such as enhanced fencing and other infrastructure improvements.

By refocusing on compensating farmers and facilitating community-driven solutions, these programs acknowledge the dual priorities of protecting an ecologically vital yet threatened species while reliably supporting the agricultural sector. Ultimately, this shift not only creates a more sustainable model of wildlife management but also ensures that public funds are used to foster genuine tolerance and harmony between farmers and wildlife, rather than subsidizing practices that have yet to yield improved coexistence. Entitlement for wildlife must be based on tolerance.

Species-Specific Damage and Costs: While WDACP reports provide total appraised loss, a species-specific cost breakdown is unavailable. However, acreage damaged by each species is detailed, offering insights into relative impact:

Species	Acres Damaged in 2023	Estimated Cost / Notes
Deer	2,432	Likely accounts for a significant portion of the $1,363,891 WDACP total, given the high acreage damage. Deer are a known major source of agricultural damage.
Bear	606	Part of the $1,363,891 WDACP total. Precise costs are not itemized.
Elk	200	Part of the $1,363,891 WDACP total. Exact dollar figures are not provided. Elk fencing for private businesses cost taxpayers $3.4 million, not from license fees.
Geese	190	Part of the $1,363,891 WDACP

Species	Acres Damaged in 2023	Estimated Cost / Notes
		total. Precise costs are not itemized.
Turkeys	3	Part of the $1,363,891 WDACP total. Minimal impact compared to other species.
Cougars	0	Part of the $1,363,891 WDACP total. No damage reported for this species.
Wolves	NA	$175,385 in reimbursements outside the WDACP, primarily for livestock, hunting dogs, and pet losses. Historical data shows variability in costs. Wolf damage compensation is funded through wolf hunting licenses and applications, with reimbursement limits.

This analysis paints a nuanced picture of wildlife management costs in Wisconsin.

Summary of Key Findings

- **Overall Costs:** The total estimated cost of wildlife damage to agriculture in 2023 came in at about $1.54 million. This figure combines appraised losses from the Wildlife Damage Abatement and Claims Program (WDACP)—which covers species like elk, deer, bear, geese, turkeys, and cougars—with separate reimbursements for wolf-related damage, which contributed $175,385 on its own.
- **Species Breakdown:** Although the WDACP does not provide a species-specific dollar breakdown, acreage figures offer some insight:
    - **Deer:** With damage reported on 2,432 acres, deer likely represent the largest share of the $1,363,891 total appraised losses. Their high impact isn't just due to the raw acreages; deer are widely recognized as a major source of agricultural damage.
    - **Elk:** Although elk damaged 200 acres, their impact is bundled within the WDACP total. However, the economic implications extend beyond direct damage—elk fencing costs alone have cost taxpayers $3.4 million, illustrating the indirect financial burdens associated with managing these species.
    - **Wolves:** Despite adding only $175,385 in direct damage claims (primarily for livestock, hunting dogs, and pet losses), wolves are managed separately. Their impact in terms of compensation costs is relatively small compared to other

wildlife. Interestingly, protection measures for wolves have an added ecological benefit: studies indicate a $10.9 million savings from reduced deer-vehicle collisions, which underscores the indirect benefits of maintaining a balanced ecosystem.

- **Data Limitations:** The analysis is built on voluntary reporting, meaning that actual damage costs may be underrepresented. Furthermore, the aggregation of species within the WDACP prevents a clear breakdown of individual impacts (other than the separate accounting for wolves), so caution is warranted when interpreting these figures.
- **Conflict vs. Protection:** When weighing conflict (in terms of direct damage costs) against the benefits of wildlife protection, the figures lean toward a protective strategy. While managing certain species like wolves might incur additional direct costs, those same species contribute to broader ecological savings—such as fewer deer-vehicle collisions—and may reduce other management expenses. Additionally, the data shows that managing a wolf hunting season can cost around $303,333 compared to approximately $250,000 for simpler protective measures, hinting that non-lethal management might be both ecologically and economically preferable.

Broader Implications and Policy Considerations

This study reinforces the idea that a strict "cost-of-damage" view can be misleading if broader ecosystem services are not taken into account. For example, while deer and elk contribute significantly to direct damage costs, the protective presence of predators like wolves can yield substantial indirect benefits. These benefits include reduced deer overpopulation and fewer collisions with vehicles, which effectively translates to a net economic saving in the long run.

Policy strategies might therefore focus on:

- **Enhancing Reporting Mechanisms:** Improving voluntary reporting and incorporating more detailed, species-specific data could lead to better-targeted management actions.
- **Integrated Management Approaches:** Rather than pitting conflict against protection, a comprehensive approach—combining compensation mechanisms with proactive wildlife conservation—can help maintain ecological balance while mitigating economic losses. For instance, investing in measures that protect livestock while preserving natural predator populations might strike the optimal balance.
- **Long-Term Economic Evaluations:** Analyzing long-term cost trends (considering both direct damage and indirect savings) supports the case for wildlife protection. The $10.9 million savings from fewer deer-vehicle collisions is a compelling argument for conservation policies that encourage the presence of natural predators.
- **Financial Incentives and Support Programs:** Programs such as reimbursement for depopulated deer farms due to Chronic Wasting Disease (CWD) and adjustments to compensation for wolf damages can help ease the economic burden on farmers. These measures, which leverage state and federal funds, provide a buffer against the unpredictability of wildlife interactions.

Cost Comparison: Hunt Season vs. Protection

The financial data strongly favors protection over hunting:

- **Hunt Season Costs:** Managing a wolf hunt season incurs direct expenses of approximately **$553,333** for staff, enforcement, public hearings, and monitoring. After accounting for **$400,000** in revenue from hunting licenses and applications, the net cost is **$153,333**.
- **Protection Costs:** Protecting wolves costs about **$250,000 annually**, covering monitoring and conflict management with no additional revenue required.
- **Additional Cost of Hunting:** A hunt season costs roughly **$303,333 more** in direct management expenses than protection ($553,333 - $250,000). This figure excludes the **$10.9 million** in lost economic benefits from reduced deer-vehicle collision savings, making hunting even less viable.

Table: Estimated Costs and Benefits Comparison of Wolf Hunting*

Category	Hunt Season Cost	Protection Cost	Revenue/Benefits
Direct Management Cost	$553,333	$250,000	-
Revenue from Hunt	-	-	$400,000 (Hunt Only)
Net Cost (After Revenue)	$153,333	$250,000	-
Economic Benefits (Annual)	-	-	$10.9M (Reduced Collisions)
Additional Cost of Hunt vs. Protection	$303,333 (Higher)	-	-

**Protecting wolves is a cost-effective strategy that delivers measurable financial benefits to the state and its residents.*

Economics of Endangered Species

The gray wolf is a keystone species that supports ecological health, delivers significant economic benefits, and enriches Wisconsin's cultural fabric. Managing a wolf hunt season costs approximately **$303,333 more** in direct expenses than protection and sacrifices **$10.9 million** in annual savings from reduced deer-vehicle collisions. These figures, combined with wolves' ecological and cultural value, make a compelling case for protection over hunting.

Divergent Insights and Next Steps

- **The Role of Ecosystem Services:** Understanding the full spectrum of ecosystem services provided by wildlife—such as natural population control and enhanced biodiversity—can shift the conversation further from a narrow cost-focused view toward a more holistic environmental valuation.
- **Adaptive Management Policies:** Given the variability in annual damage figures (influenced by weather, wildlife populations, and agricultural practices), adaptive management strategies that are flexible enough to respond to shifting trends could yield better outcomes both economically and ecologically.
- **Community-Based Conservation Initiatives:** Engaging local communities and farmers in conservation efforts can not only improve reporting accuracy but also foster a sense of

shared responsibility for managing wildlife-human conflicts. Innovative ideas, such as cooperative monitoring programs or technology-driven solutions (e.g., real-time damage assessment apps), might further enhance the effectiveness of these strategies.

- **The National Caucus of Environmental Legislators (NCEL):** Is a vital network that supports state lawmakers in advancing innovative, evidence-based environmental policies. One of its flagship resources, the **Endangered Species State Guide** provides a comprehensive framework for states to strengthen and expand their own endangered species lists through State Endangered Species Acts (SESAs). This guide helps fill the gaps left by federal regulations by offering clear, scientifically grounded strategies to protect species facing threats like habitat loss, climate change, and human encroachment.

  A significant component of the NCEL **guide is its emphasis on securing robust, bipartisan funding for conservation initiatives.** Recognizing that effective wildlife protection requires sustained financial investment, the guide outlines tested funding models that have garnered support across party lines. In Wisconsin, for example, bipartisan collaboration has been instrumental in advancing these initiatives. Legislators such as Representative Lee Snodgrass (D-Appleton) Representative Elijah Behnke (R-Chase), and Senator Jeff Smith (D-Brunswick) have endorsed and helped to finalize a bipartisan-approved guide, which emphasizes enhanced state funding dedicated to endangered species protection and habitat restoration programs.

  This bipartisan approach is crucial in addressing the challenges associated with protecting vulnerable species, including high-profile carnivores like wolves. The NCEL guide recommends that states not only update and rigorously manage their endangered species lists based on the latest ecological data, but also set up adaptive monitoring systems that can respond to emerging threats. In the case of wolves, this means establishing science-based conservation measures—such as regulated harvest quotas and non-lethal conflict resolution strategies—that ensure long-term population viability and ecological balance.

  Alongside protecting individual species, the NCEL guide addresses the broader issues of carnivore coexistence. It outlines strategies for designing management programs that balance the needs of human communities with the conservation of large predators. Through a combination of proactive policy directives, community engagement, and evidence-based management techniques, the guide incorporates best practices for reducing human-wildlife conflicts. These measures help create livable landscapes where residents, business interests, and carnivorous species can coexist sustainably.

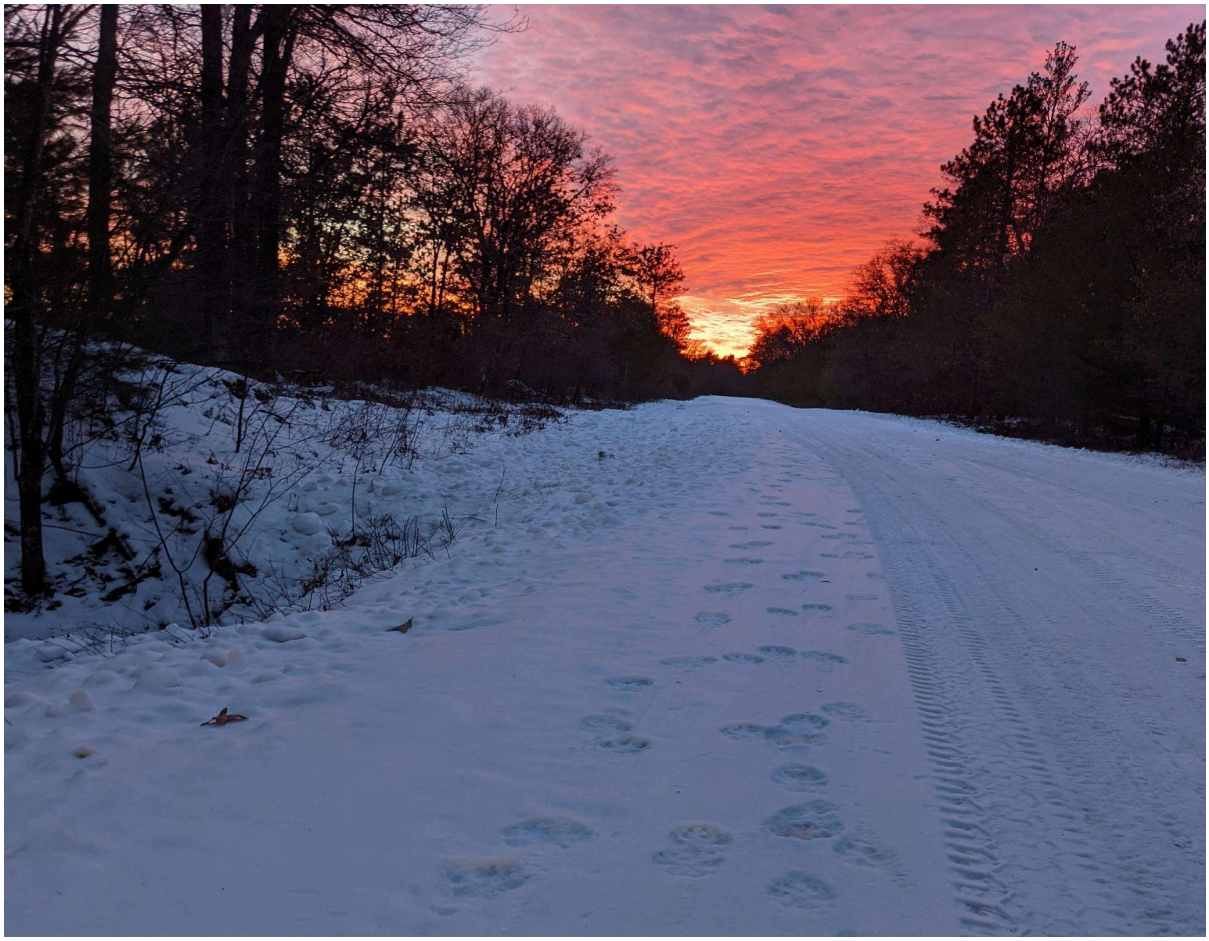
  Overall, by merging rigorous scientific research with pragmatic, politically sustainable policies, the NCEL's Endangered Species State Guide offers a roadmap for creating effective, state-level conservation frameworks. Its emphasis on diverse perspectives—including those brought by federal experts like—ensures a more comprehensive understanding of ecosystem dynamics and species conservation. Ultimately, these efforts help secure a resilient future for endangered species, bolster carnivore coexistence, and exemplify how bipartisan, well-funded approaches can overcome the challenges posed by environmental threats.

> By integrating the scientific imperatives of species protection with the political will to fund and implement robust conservation programs, the NCEL's framework serves as an indispensable tool for environmental policymakers. This collective commitment—from national organizations down to state legislators in Wisconsin and beyond—ensures that our conservation practices remain both adaptive and resilient in the face of an ever-changing natural world.

By enacting immediate state-level protections, we can ensure that this iconic species continues to roam our forests, inspire awe in our citizens, and maintain the ecological equilibrium that underpins all life. The evidence is incontrovertible, the need is urgent, and the time for decisive action is now. We therefore implore Wisconsin's conservation authorities and legislators to adopt this petition, enacting lasting measures that will protect the gray wolf for generations to come.

Policy Recommendations: In light of these findings, we recommend that the Wisconsin DNR, the Natural Resources Board, and state legislators:

- Designate the gray wolf as an endangered or threatened species under Wisconsin law, thereby ensuring that robust, state-level legal protections are in place to counteract federal shortcomings.
- Allocate dedicated state funding, using mechanisms like the Endangered Resources Program and tax check-offs, to support comprehensive monitoring, habitat restoration, and enforcement efforts.
- Institutionalize enhanced cross-agency and tribal collaboration, to ensure that management decisions are science-driven, culturally informed, and responsive to real-time data.
- Implement a stringent, transparent evaluation system for adaptive management initiatives, ensuring that any changes in policy are backed by rigorous scientific research.
- Encourage the adoption of non-lethal conflict resolution strategies, thereby reducing the need for lethal control measures that have proven disruptive and counterproductive. This is a chance to lead—to protect wolves and empower its people, now and for generations to come.



Conclusion

The evidence presented here demonstrates that:

- The gray wolf is a keystone species whose presence sustains biodiversity, regulates prey dynamics, and provides essential ecosystem services.
- Historical data, coupled with current monitoring, indicates that although the wolf population has rebounded from near-extinction, it remains vulnerable to mismanagement.
- Federal budget cuts and policy shifts have significantly weakened the interagency cooperation and technical capacity necessary to ensure long-term conservation.
- Broad public support, particularly from urban and suburban demographics, overwhelmingly favors increased protection measures, while the economic benefits—through reduced vehicle collisions, boosted tourism, and healthier ecosystems—are substantial.
- Case studies from other states and innovative non-lethal management models illustrate viable pathways to secure the wolf's future in Wisconsin.

Appendix: Glossary and Sources

- **Adaptive Management:** A structured, iterative process of robust decision making in the face of uncertainty, with an aim to reduce uncertainty over time via system monitoring.
- **ESA (Endangered Species Act):** A federal law enacted in 1973 designed to protect critically imperiled species from extinction.
- **Keystone Species:** A species that exerts a disproportionate influence on the ecosystem relative to its abundance.
- **CWD (Chronic Wasting Disease):** A prion disease affecting deer and elk populations that poses indirect risks to wolves by altering prey dynamics.
- **MBTA (Migratory Bird Treaty Act):** A federal law protecting migratory bird species that has historically included provisions indirectly beneficial to habitat conservation.
- **USFWS (U.S. Fish and Wildlife Service):** A federal agency responsible for managing the conservation, protection, and enhancement of America's fish, wildlife, and plants.

USGS (U.S. Geological Survey), USFS (U.S. Forest Service), USDA (U.S. Department of Agriculture), NPS (National Park Service):

- Abatement and Claims Program Wisconsin DNR https://dnr.wisconsin.gov/topic/WildlifeHabitat/wdacp
- Program offers compensation for crop, livestock producers experiencing wildlife damage: Wisconsin DNR https://dnr.wi.gov/news/weekly/article/?id=2919
- Wolf depredations of livestock increased in 2024: Wisconsin Milwaukee Journal Sentinel https://www.jsonline.com/story/sports/outdoors/2025/01/07/wolf-depredations-of-livestock-increased-in-2024-in-wisconsin/77428928007/
- With The Wolf Delisted, Farmers And Landowners Are Taking Steps To Remove Problem Wolves: WPR https://www.wpr.org/agriculture/wolf-delisted-farmers-and-landowners-are-taking-steps-remove-problem-wolves
- Gray wolf depredation reports and maps Wisconsin https://dnr.wisconsin.gov/topic/WildlifeHabitat/wolf/maps
- Deer caused about 3x the reimbursable damage compared to wolves in state last year: Wisconsin Farmer https://www.wisfarmer.com/story/news/2021/11/21/deer-cause-more-reimbursable-damage-2020-compared-wolves/8716043002/
- Wildlife Ecology and Damage Management University of Wisconsin: https://fyi.extension.wisc.edu/wildlife

References, News Articles, and Scientific Support

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This petition represents a comprehensive endeavor to synthesize decades of scientific research, rigorous statistical analysis, and culturally informed perspectives into a cohesive argument advocating for state-level protection of the gray wolf in Wisconsin. By establishing a robust, adaptive management framework that is insulated against federal budget fluctuations—and by codifying the protection of an ecologically and culturally significant species into state law—a future wherein Wisconsin's wild landscapes continue to flourish can be secured.

The intricate interplay of ecological processes, economic considerations, and deeply rooted cultural values necessitates resolute action. The advantages of state-level listing extend beyond the scope of wildlife conservation; they ensure public safety, foster economic resilience, and safeguard an enduring symbol of wilderness that has long inspired generations.

This document is submitted in full support of the petition to designate the gray wolf as an endangered or threatened species in Wisconsin. All data, case studies, and recommendation models referenced herein are predicated upon peer-reviewed literature, government reports, and validated field studies, thereby substantiating the argument for immediate legislative and policy action to ensure a sustainable future for Wisconsin's ecosystems and communities.