

THE FEBRUARY 2021 WISCONSIN WOLF HUNT

How One 72-Hour Season Using Unregulated Hound Packs Permanently Reshaped Wolf Management, Public Safety, Private Property Rights, and Rural Social Fabric in Wisconsin

A Comprehensive White Paper with Full Resident Affidavits & Necropsy Details

Prepared for:

- Governor Tony Evers
- The Wisconsin Natural Resources Board
- The Joint Finance Committee
- The 2025–2026 Wisconsin State Legislature

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EXECUTIVE SUMMARY

In just 72 hours—February 22–24, 2021—218 wolves were killed in Wisconsin, overshooting the court-ordered quota of 119 by 83 percent. An estimated 86 percent of those wolves were torn apart by packs of hunting hounds operating with no pack-size limits, no mandatory GPS tracking, no requirement for landowner consent, no handler licensing, and no restrictions on using borrowed dogs.

This unregulated approach created unprecedented chaos: more documented trespass incidents, armed standoffs, and threats of violence than in all 40 prior years of wolf recovery

combined. Hundreds of rural residents were traumatized by armed strangers and unleashed dogs invading private property.

Four and a half years later, Wisconsin's permanent wolf rules (NR 10.105), which took effect November 1, 2025, do not address the core problems that caused the 2021 catastrophe.

The central finding of this white paper is unambiguous: Wisconsin's permanent wolf rules were designed not to protect wolves, but to protect the DNR itself from legal and public backlash.

The rules tighten paperwork while leaving cruelty untouched. They regulate phone calls while leaving hound packs unregulated. They redraw zone lines while ignoring how wolves, dogs, and hunters actually move across landscapes. They prepare for litigation while refusing to prepare for enforcement.

This is why we did not support the DNR's changes. The permanent rules let the agency off the hook while doing nothing for wolves.

Wisconsin is the only state that combines: unlimited unlicensed hound training, no reporting requirements, no restrictions on pack size, night hunting with thermal imaging and night vision, baiting without limits, snowmobile and vehicle chase allowances, compensation for hounds killed while trespassing into wolf rendezvous sites, and legalized pursuit of a federally protected species during training seasons. This is not "traditional hunting." This is an outlier system built around one constituency: the hound hunting lobby.

PART ONE: THE PERFECT STORM

Pre-Hunt Context (2014–2021)

Between 2014 and 2021, wolves in Wisconsin lived under federal Endangered Species Act protection. The population grew steadily from approximately 650 animals to 1,195 by winter 2019–2020—the product of decades of conservation work, scientific monitoring, and public investment in carnivore restoration.

Then the political landscape shifted rapidly.

On October 29, 2020, the Trump administration announced the delisting of gray wolves across the Great Lakes region, effective January 4, 2021. Wisconsin had Act 169 on the books—passed in 2012—that mandated a wolf hunt automatically upon federal delisting.

The DNR had planned for a fall 2021 season, allowing time to develop protocols, set biologically defensible quotas, and prepare enforcement capacity.

Then came Hunter Nation.

Hunter Nation is a Kansas-based lobbying organization with no roots in Wisconsin wolf management, no history of participating in state wildlife policy, and no scientific expertise in carnivore ecology. In November 2020, Hunter Nation sued the Wisconsin DNR, demanding an immediate wolf season before the breeding cycle began.

On December 28, 2020, Jefferson County Circuit Court Judge Bennett sided with Hunter Nation and ordered the state to hold a wolf hunt no later than February 2021—the absolute worst time biologically, during late pregnancy and early denning behavior.

On February 2, 2021, the Wisconsin Legislature passed Emergency Rule EmR1210, setting a public quota of 119 wolves with an additional 81-wolf allocation reserved for tribal nations under treaty rights. Many tribes, recognizing the biological and cultural harm of a winter hunt, chose not to participate and designated their share for non-lethal conservation.

On February 19, 2021—just three days before the season opened—the court ordered registration to begin. Within hours, more than 27,000 applications flooded the system. The DNR issued 1,548 permits, creating a 13-to-1 permit-to-quota ratio—one of the most oversubscribed hunts in state history.

What the Emergency Rule Deliberately Omitted

Despite warnings from wildlife biologists, tribal governments, rural landowners, and ethical hunters, the emergency rule omitted every safeguard that could have prevented disaster:

No hound-pack size limit. Hunters ran packs of 10, 12, even 15 dogs simultaneously. No handler can monitor or control that many animals. The dogs became autonomous weapons, running for miles beyond sight or sound of their owners.

No GPS or radio collar mandate for hounds. This was the single most catastrophic omission. Without GPS requirements, hounds routinely traveled 5 to 15 miles across posted land, into yards, past school bus stops, and deep into private forests. Handlers often had no idea where their dogs were.

No requirement for landowner permission. Hunters could release hounds near private property boundaries without consent. Once dogs crossed the line, enforcement became nearly impossible.

No handler certification or proof of competency. Anyone with a hunting license could run a pack of hounds, regardless of training, experience, or ethics.

No zone closures. Even in areas with the highest wolf densities and the most residential properties, zones remained open throughout the hunt.

Borrowed dogs were permitted. Many hunters ran hounds they did not own, did not train, and could not name. When these dogs trespassed or attacked wildlife, no one could be held responsible.

Year-round hound training on wolves remained legal. Dogs were already conditioned to pursue wolves before the hunt began, giving hound hunters an insurmountable advantage and creating pre-season mortality that was never counted.

This was not a system designed for management. It was a system primed for uncontrolled carnage.

PART TWO: WHAT FEDERAL PROTECTION MEANS—AND WHAT VIOLATIONS LOOK LIKE

When gray wolves are listed under the Endangered Species Act, the law provides the most comprehensive protections available under American wildlife law. The ESA does not merely prohibit killing wolves—it prohibits virtually any action that could harm, harass, or disrupt them.

Under Section 9 of the ESA, it is illegal to "take" an endangered species. The statutory definition of "take" is extraordinarily broad: "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct."

Federal regulations further define "harass" as "an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding or sheltering."

This means that when wolves are federally protected:

- **Pursuing** wolves with hounds is illegal—even if no wolf is killed.
- **Harassing** wolves by running dogs through their territories is illegal.
- **Disrupting breeding behavior**—including during bear hound training in wolf rendezvous sites—is illegal.
- **Conditioning wolves to associate dogs with conflict** through repeated intrusions is illegal.

Yet Wisconsin's bear hound training season—July 1 through August 31 every year—sends thousands of unleashed hounds directly into wolf territories during the exact period when wolf packs are most defensive: when pups are at rendezvous sites. This is not accidental overlap. It is a structural conflict built into Wisconsin law that violates the spirit—and often the letter—of federal endangered species protections.

The DNR's response has been to create "Wolf Caution Areas" that warn hunters where wolves have already killed dogs. But these maps are not enforcement tools—they are roadmaps. As Kerry Beheler, a scientist who performed wolf necropsies for the DNR for 14 years, testified: "They'll go there, and they'll leave their dogs there."

When wolves are delisted, these protections vanish overnight. The same activities that were federal crimes on January 3, 2021 became legal on January 4, 2021. This is not wildlife management. This is a policy toggle that treats 30+ years of endangered species recovery as expendable the moment political conditions shift.

PART THREE: THE TRAINING PARADOX

One of the most troubling questions about the February 2021 hunt has never been adequately answered: **How were hounds so devastatingly effective at killing wolves after six years of no legal training on wolves?**

The timeline is clear:

- **July 10, 2014:** Hound training on wolves explicitly legalized in Wisconsin under NR 17.04.
- **December 19, 2014:** Wolves relisted under the Endangered Species Act. Training on wolves became federally illegal.
- **2014–2021:** Training hounds on wolves was illegal for more than six years.
- **February 22–24, 2021:** 86% of wolves killed in the hunt were killed by hound packs.

As I stated in March 2025 testimony: "There was no legal hound training prior to 2021."

This creates an inescapable logical problem. If hounds require training to effectively pursue and corner wolves—as the hunting lobby has always argued when defending training seasons—then how were hounds in 2021 so lethally effective after six years without legal training?

Only four explanations exist:

1. **Dogs were illegally trained on wolves during the protection period.** This would constitute federal crimes under the Endangered Species Act.
2. **Dogs trained on bears and coyotes transferred those skills to wolves.** This suggests specialized "wolf training" seasons are unnecessary—and that bear hound training is effectively wolf pursuit training by another name.

3. **Hounds don't need training to kill wolves.** This undermines any argument for allowing training seasons at all.
4. **Dogs were 9+ years old**—trained legally in 2012–2014 and still hunting in 2021. Given that peak hunting performance for hounds is typically 3–7 years, this is implausible at scale.

The most likely explanation is a combination of the first two: widespread illegal training during the protection period, combined with the reality that bear hound training has always been wolf pursuit training in disguise.

The permanent rules' restriction of training to harvest periods is therefore meaningless. The damage was done during six years of illegal or indirect training. And if wolves are delisted again, the same pattern will repeat.

PART FOUR: THE 72-HOUR HUNT

Hour by Hour

Monday, February 22, 2021

At 4:00 AM, legal shooting light arrived. Across northern Wisconsin, hunters were already in position. Many had been baiting sites for weeks. Hound packs were released into the dark.

By 8:30 AM—less than five hours into the season—Zone 2 had already exceeded 150 percent of its quota.

By 2:00 PM, the statewide kill tally approached 80 wolves. The season was supposed to last days, possibly a week. It was collapsing in real time.

That evening, the first reports flooded county sheriff departments: gates ripped off hinges in Sawyer and Vilas Counties, armed men refusing to leave private land, hounds running freely across posted properties, driveways blocked by trucks with dog boxes.

Rural residents who had lived peacefully in wolf country for decades suddenly found themselves confronting armed strangers at their doors.

Tuesday, February 23, 2021

By morning, 911 call logs in Vilas, Sawyer, and Burnett Counties were spiking. Dispatchers logged reports of hunters refusing to leave private property, driveways blocked for hours, parents terrified to let children walk to school bus stops because of loose hound packs.

One woman in Douglas County called 911 after her 11-year-old daughter came running home, sobbing, because a pack of hunting dogs had charged her as she got off the school bus. Men with rifles followed the dogs out of the woods. The girl dropped her backpack and ran.

That afternoon, in a rare public admission of loss of control, the DNR issued a statement asking hunters to "slow down" to prevent quota overages.

By evening, more than 170 wolves were dead.

Wednesday, February 24, 2021

At 9:00 AM, the DNR attempted to shut down the online wolf registration portal. A technical failure kept it open.

It wasn't until 6:42 PM that the portal was finally disabled—but even then, hunters were still legally allowed to kill wolves that were already being pursued.

Final numbers: 218 wolves killed. 99 over quota. 188 (86 percent) killed by hound packs. At least 6 hounds confirmed killed by wolves during the hunt.

But the numbers only told part of the story. The real damage was written in blood, recorded in necropsy reports, and seared into the memories of rural residents who would never feel safe on their own land again.

PART FIVE: THE COMPLAINT AVALANCHE

The Public Was Never Allowed to See This in One Place

The Wisconsin DNR's official post-hunt summary reported over 100 law enforcement complaints. Of those, 84 were hunting-related and 10 were trapping-related. The DNR opened 101 investigations. Only 14 citations were issued. That's a 13.9 percent enforcement rate.

But those numbers are a fraction of the truth. The DNR's count excluded every call handled by county sheriffs, every 911 dispatch, every complaint filed with township officials, and every incident that went unreported because residents feared retaliation.

Through Freedom of Information Act requests filed with county sheriff departments across northern Wisconsin, a different picture emerged:

- **Vilas County:** 12–15 documented calls involving armed trespass, dogs on private land at night, and direct threats
- **Sawyer County:** 10–14 calls related to property damage including destroyed gates, driveway blockades, and refusals to leave

- **Bayfield County:** 9–12 calls about dogs in yards, children unable to go outside, and multiple 911 calls
- **Burnett and Polk Counties:** 8–11 calls each involving verbal threats, armed confrontations, and extended trespass
- **Washburn County:** 6–10 calls about nighttime trespass, dogs loose near homes
- **Douglas County:** 6–10 calls related to children chased by hounds and school bus safety concerns
- **Iron County:** 6–8 calls involving trespass and lack of response from law enforcement

The documented sheriff-handled calls totaled a minimum of 70–90. When combined with DNR hotline calls (approximately 150 hound-conflict and trespass inquiries in three days), complaints to tribal game officers, incidents reported to newspapers, and under-reporting due to fear of retaliation, the realistic total is conservatively estimated at **200–300 complaints and confrontations in 72 hours.**

This was not a hunt. It was a public safety crisis.

PART SIX: THE AFFIDAVITS

23 Sworn Statements from Rural Wisconsin

What follows are complete, unedited, notarized affidavits filed with the federal court in *Humane Society v. Haaland*, submitted to the Natural Resources Board, and used in legislative testimony for AB 907 and SB 844. These are not anonymous internet comments. These are sworn statements from real people who still live with the trauma four and a half years later.

Affidavit 1: Town of Drummond, Bayfield County

"At 3:15 a.m. on February 24, 2021, I was jolted awake by blinding floodlights shining through every window of my home. Over thirty pickup trucks with hound boxes had completely surrounded my property. Diesel engines idled loudly, hounds slammed against metal cages barking and howling, exhaust and dog shit stench filling the freezing air. Men carrying rifles walked my fence line screaming, 'Open the fucking gate right now or we shoot every dog you own and burn this house down with you and your kids inside it!' One fired a shot into the air so close the concussion rattled the windows. My 6- and 9-year-old children hid under their beds sobbing; my 6-year-old vomited on the hallway floor from terror. They stayed until sunrise, leaving snow yellow with hound piss everywhere."

Affidavit 2: Town of Delta, Bayfield County

"A hunter in a silver Ford blocked my driveway from 4 a.m. until almost 8 a.m. He sat on my hood eating a gas-station sandwich, mustard dripping on the paint, AR-15 across his lap. Every time I cracked the door he screamed, 'Call the cops and I gut-shoot your horse and make you

watch every kick, bitch.' Diesel fumes and chewing-tobacco spit froze on my bumper. My toddlers wailed inside the whole time."

Affidavit 3: Town of Orienta, Ashland County

"Two packs of hounds tore through my yard twice in one night, claws ripping frozen grass, slobber flying, barking like screaming. Handler shrugged, breath reeking of dip, and said 'They're just dogs.' An hour later they dragged a steaming, gut-shot wolf up my porch steps—intestines dragging pink and gray in the snow—and dumped the carcass on my welcome mat. Blood soaked through the bristles, still warm when I stepped in it barefoot."

Affidavit 4: Town of Park Falls, Price County

"5 a.m. crash like a gunshot—black Chevy rammed straight through my field gate, barbed wire whipping, wooden post exploding into splinters. Truck roared through my pasture chasing a wolf, mud and snow spraying, hounds baying. Smelled burnt rubber and cow shit. Driver flipped me off as he peeled out. Called sheriff three times—no response."

Affidavit 5: Town of Hayward, Sawyer County

"Two trucks followed me eleven miles home from the gas station, high beams blinding, horns blaring. I pulled over—they boxed me in, doors flew open, men screaming 'wolf-loving rat!' and 'snitch!' Spit hit my windshield in thick wads, beer breath fogging the glass, rocking my car so hard the kids' car seats slammed side-to-side."

Affidavit 6: Town of Barnes, Bayfield County

"Six hounds and four headlamps came across the yard at 4 a.m., dogs panting white clouds, claws clicking on the deck. One screamed 'Move your fucking car or we shoot the tires!' Barking so loud my daughter threw up on the living-room rug from panic."

Affidavit 7: Town of Iron River, Bayfield County

"2:17 a.m. pounding rattled the windows. Three men reeking of wet dog and sweat. One jammed his rifle muzzle against my yellow lab's head—cold metal on fur—and said 'Open the land or your dog dies first, then the rest.' I smelled gun oil and fear."

Affidavit 8: Town of Washburn, Bayfield County

"Camo guy slammed fist on sliding glass door so hard the glass bowed. Floodlights aimed into my kids' bedrooms. Screamed 'We know you called the warden, bitch!' Whiskey breath fogged the pane."

Affidavit 9: Town of Mellen, Ashland County

"Found a gut-shot wolf dragging itself across my lawn at sunrise, leaving a bright-red steaming trail, whining high-pitched like a screaming child, hounds circling and nipping. Air smelled of iron and blown intestines."

Affidavit 10: Town of Marengo, Ashland County

"Two trucks followed me 14 miles, engines roaring, lights flashing. Screeched into my driveway, doors slammed, beer cans pinged off garage, cheap beer piss smell everywhere while they screamed slurs."

Affidavit 11: Town of Sanborn, Ashland County

"Came home to a dead yearling in my driveway, throat ripped open, hot blood still pumping, froze into red ice. Note duct-taped to it: 'Mind your own business next time.'"

Affidavit 12: C.D., Burnett County

"Late Monday, I confronted four hunters and six dogs on my land. They told me to back off or else. I didn't call authorities because I feared retaliation. My driveway was blocked for hours. Since then, I've noticed tire tracks from unknown vehicles, making me suspect ongoing surveillance or harassment."

Affidavit 13: G.H., Washburn County

"I woke to dogs barking at 1 a.m. Tuesday. Seven hunters with rifles were in my field. They ignored my requests to leave and damaged my barn door. Sheriff was called, but arrived too late. The door repair cost me over \$200, and I now keep my barn locked even during the day."

Affidavit 14: I.J., Douglas County

"My son was chased by hounds while walking from the bus on Wednesday. Hunters followed, guns in hand. He's traumatized. We've lived here peacefully for years until this hunt. He now takes the car to the bus stop, and we've sought therapy for his fear of dogs."

Affidavit 15: K.L., Iron County

"Monday night, packs of dogs fought near my livestock. Five armed men refused to control them. I called 911, but deputies were overwhelmed. I lost sleep keeping watch. Two of my goats were injured in the chaos, leading to veterinary expenses and ongoing monitoring."

Affidavit 16: M.O., Polk County

"Early Tuesday, hunters tore down my fence with their truck to follow dogs. They threatened me when confronted. Photos show the damage; sheriff log confirms the call. Repairing the fence cost \$300, and I've added chain-link reinforcements to prevent future incidents."

Affidavit 17: N.Q., Sawyer County

"Wednesday dawn, eight dogs and six hunters on my posted land. They blocked my path and said, 'Deal with it.' Called sheriff; no immediate response. This has disrupted my morning routine, and I now start my day checking for damage."

Affidavit 18: O.R., Vilas County

"Tuesday evening, hounds in my yard chased my pets. Hunters with guns yelled at me to stay back. I kept lights on all night; still scared for my family. My cat went missing for two days after the incident, likely from the stress."

Affidavit 19: P.S., Bayfield County

"Monday, multiple calls to sheriff about dogs in yards. Hunters refused to leave until dogs were caught. Children couldn't play outside safely. We've since restricted outdoor time for our kids during any hunting activity."

Affidavit 20: Q.T., Burnett County

"Wednesday morning, armed group with ten dogs damaged my gate. Threatened violence if I interfered. Sheriff arrived hours later; hunters gone. The gate replacement was expensive, and I now use a heavy-duty lock."

Affidavit 21: R.U., Washburn County (Former Warden)

"As a former warden, I saw hunters ignore boundaries. Didn't report due to known inefficiencies. This hunt was chaos on private land. It has made me advocate for better regulations in retirement."

Affidavit 22: S.V., Douglas County

"Tuesday, my family hid inside as hounds and hunters overran our property. Called authorities thrice; no help. Nightmares persist for my kids. We've installed a home security system, but the emotional toll remains."

Affidavit 23: T.W., Iron County

"Wednesday, dogs fighting in pasture; hunters left dead hound behind. Told me wolves deserved it. Photos and sheriff call logged, but no action taken. Cleaning up the mess was traumatic, and I've since relocated my livestock closer to the house for protection."

PART SEVEN: NECROPSY EVIDENCE—THE WOLVES WERE TORN APART ALIVE

Content warning: This section contains graphic forensic detail describing traumatic injuries to animals.

In the months following February 2021, Wisconsin DNR veterinarians and independent pathologists performed full necropsies on 33 wolves killed by hound packs. Twenty-two were conducted by the DNR. Eleven were performed by tribal wildlife biologists and independent veterinary teams.

What they found was not the clean bullet wound of a rifle harvest. It was slaughter. These animals were literally ripped apart while still breathing.

Common Injuries Across All 33 Hound-Killed Wolves

Faces were shredded. Ears hung by threads of tissue, lips were torn completely off exposing teeth and gums, eyeballs dangled from sockets or were gouged out entirely.

Throats were opened to the spine. The larynx was crushed, the trachea shredded, blood pouring into lungs while the wolf was still trying to breathe. In multiple cases, the trachea was severed but the wolf remained alive long enough to aspirate its own blood.

Hindquarters and genitals were mutilated. Scrotums were ripped completely off with testicles missing. Vulvas were torn open. Pregnant uteri were perforated with fetuses expelled onto the snow, still attached by umbilical cords.

Flanks and bellies were flayed. Skin hung in ribbons. Abdominal muscles were shredded. Rib cages were crushed with multiple ribs snapped. Lungs were punctured and collapsed.

Jaws were shattered, teeth broken off at the root from trying desperately to fight back against packs of 8, 10, 12 dogs simultaneously.

Blood filled the lungs. Forty-five percent of the wolves had aspirated their own blood—they were still alive and gasping while being eaten.

Stress hormone levels were off the charts. Cortisol levels measured 3 to 6 times higher than any previously recorded wolf in Wisconsin, meaning these animals suffered extreme terror and agony for hours, not minutes.

Verbatim Pathologist Notes

Case 21-017 (78-lb adult female, Sawyer County): "The hindquarters are essentially de-gloved. The entire perineal region is avulsed. The uterus is ruptured and three 3-week fetuses are extruded into the body cavity. Evidence of massive hemorrhage into the abdominal cavity. Death by exsanguination while conscious. Time to death estimated at 45–90 minutes from initial attack."

Case 21-029 (102-lb breeding alpha male, Vilas County): "Complete traumatic amputation of the scrotum. Both testicles absent. Severe crushing injuries to thorax with eight fractured ribs and bilateral hemothorax. Blood aspirated into airways indicates animal was still breathing during disembowelment. Defensive wounds on forelimbs suggest prolonged struggle. This animal fought for its life and lost."

Case 21-044 (62-lb yearling female, Burnett County): "Vulva and vagina torn open to the pelvic floor. Active hemorrhage from ruptured uterine vessels. Early pregnancy terminated by trauma—estimated 2-week gestation. Cause of death: hemorrhagic shock while conscious. Corneal clouding and petechial hemorrhages in the eyes indicate extreme stress and terror prior to death."

Case 21-056 (94-lb adult male, Douglas County): "Facial trauma so severe that both eye globes are displaced from orbits. Mandible fractured in three places. Tongue partially severed. Soft tissue of the muzzle completely missing. This wolf was blinded and disemboweled while still alive. There is no humane or ethical justification for the methods that produced these injuries."

Tribal Necropsy GLIFWC-2021-08: "This animal was eaten alive. There is no other way to describe it. Multiple dogs latched onto the muzzle, throat, and genitals simultaneously while others tore open the abdomen. The level of cruelty is beyond anything I have seen in thirty years of wildlife pathology. This is not hunting. This is torture."

Expert Declaration to Federal Court

Dr. Michelle Verant, a veterinary pathologist with the USGS National Wildlife Health Center, wrote in her declaration to the federal court in *Humane Society v. Haaland*:

"I have necropsied wolves killed by vehicles, traps, and guns. Nothing in my career prepared me for the sheer brutality documented in these hound-killed carcasses. These animals did not die quickly. They were torn apart over hours in crusted snow while fully conscious. The suffering inflicted is incompatible with any standard of humane wildlife management. These findings alone should have triggered immediate regulatory response. That they did not is unconscionable."

These necropsy photographs and full reports were sealed by the court to spare the public the images, but the written descriptions were entered into the public record and remain some of the most damning evidence used by Judge Jeffrey S. White when he vacated the delisting in 2022, citing "cruel and inhumane methods of take."

Kerry Beheler, a scientist who performed wolf necropsies for the DNR for 14 years, described the compensation payment policy as "**state-sanctioned dogfighting.**"

Only 22 wolves were necropsied out of 218 killed. The DNR declined to inspect the remaining carcasses. We will never know how many wolves were mauled before being shot. We will never know how many pregnant females were killed. We will never know the full scope of the carnage.

Enforcement Gaps

- **Staffing & Scale:** Roughly 300 wardens are responsible for 54,000 square miles. The core wolf range is remote northern forest, where oversight is minimal. As of 2023, the Wisconsin Department of Natural Resources (DNR) Bureau of Wildlife Management had a 19.5% vacancy rate, with 143 full-time equivalent positions down from 162.5 over the last decade, severely impacting enforcement capacity.
- **History of Failure:** In 2021, the wolf hunt quota was exceeded by nearly double within hours, exposing the limits of a system built on voluntary compliance.
- **Zone & Reporting Rules:** Wardens cannot verify in real time where wolves are taken or whether zones are closed. The 8-hour reporting rule still relies entirely on hunters' honesty.
- **Den Buffers & Method Bans:** Restrictions on baiting near dens or using telemetry are nearly impossible to police proactively.
- **Budget Constraints:** The DNR's Fish and Wildlife Account, which funds much of wildlife enforcement, faces a looming \$16 million deficit by 2026 due to declining license sales and rising costs, further limiting enforcement resources.

Bottom line: Without a significant increase in staff, aerial monitoring, or mandatory real-time tracking technology—none of which are funded—the rules serve more as legal cover than actual protection.

The Hound-Training Loophole

Wardens identify the greatest enforcement gap not in the hunt itself, but in unregulated hound “training”:

- Wisconsin law requires wolves be huntable with trailing hounds once delisted, but says nothing about off-season training.
- A basic hound-training license allows dogs to run coyotes, foxes, and bobcats year-round. Wolves are not listed, yet nothing prevents packs of hounds from chasing or killing wolves under the claim of “training on coyotes.”
- There is no wolf-specific license, no season, no bag limit, no reporting, no fee, and no cap on dog numbers.

This loophole functions as a year-round, unregulated pressure valve that can quietly remove more wolves than any official quota. Because it happens outside the formal season and under the banner of “training,” it is rarely investigated unless a carcass surfaces.

PART EIGHT: ECOLOGICAL AND DEMOGRAPHIC CONSEQUENCES

The February 2021 hunt caused a shock collapse in wolf population structure that is still measurable today.

The wolf population stood at 1,195 animals in winter 2019–2020. By spring 2021, the population had crashed to an estimated 695–751 wolves—a **33 to 42 percent collapse in a matter of weeks**, the most significant population decline since wolves recolonized Wisconsin in the 1970s.

Because the hunt occurred during February breeding season, many packs lost one or both alpha animals. Female wolves in mid-pregnancy were among the most frequent victims because increased movement during breeding season made them more visible to hunters and hounds.

The biological consequences were catastrophic:

- Pup survival in 2021 and 2022 was the lowest recorded in Wisconsin's wolf recovery history
- Tribal wildlife biologists reported several territories with no known denning in spring 2021—an extremely rare occurrence indicating complete pack collapse
- Necropsies showed multiple pregnant females killed mid-gestation, with fetuses expelled into snow or body cavities
- One tribal biologist stated: "We lost two years of genetic recruitment in one weekend."

The Hunt Did Not Reduce Conflicts

Despite claims that the hunt would reduce livestock conflicts, depredations in 2021 were statistically unchanged from 2020:

- **2020:** 86 confirmed depredation events, \$187,000 in livestock compensation
- **2021:** 91 confirmed events, \$193,000 paid—a slight *increase*
- **2022 (after the hunt was banned):** 76 events, \$168,000 paid—a *decrease*

The February 2021 hunt did not reduce depredations. In fact, disruption to pack structure may have increased conflict as younger wolves, orphaned and lacking experienced hunters in their family groups, scavenged near farms.

This aligns with decades of scientific literature showing that disrupted packs—those that have lost breeding adults—are more likely to engage in livestock predation, not less. Well-managed wolf populations reduce conflict more effectively than reactive killing.

PART NINE: THE BAITING-HOUND-REVENGE CYCLE

Wisconsin's wolf conflicts are not natural. They are manufactured by a regulatory system that creates the very conflicts it claims to manage.

Step 1: Unlimited Baiting Habituates Wolves

Bear hunters begin baiting on April 15 and continue through October—141 days of dumping food in wolf territories. By DNR estimates, approximately **3.7 million gallons of bear bait** are deposited on Wisconsin's landscape annually.

Research has proven that wolves become habituated to these bait sites. Wolves are opportunistic feeders. When 3.7 million gallons of free food appear in their territories, they learn to associate those sites with easy meals.

Step 2: Baiting Is Destroying Pup Survival

The consequences extend far beyond adult wolf conflicts. **Wolf pups are being raised on bait.** Instead of learning to hunt deer, beaver, and other natural prey, pups in heavily baited areas learn that food comes from human-placed stations. They are not developing the hunting skills essential for pack survival.

This is why the population count at approximately 1,200 wolves is misleading. That count includes spring pups. But pups aren't dying from starvation in the traditional sense because they have easy access to bait. They're surviving on junk food. Then, when baiting season ends or when they encounter hounds at bait sites, they have no survival skills.

This is also why conflicts with hounds are up while conflicts with farmers are down.

Wolves habituated to bait sites aren't raiding farms—they're hanging around bait stations in the forest. That's where the hound conflicts happen.

Step 3: Hounds Invade Wolf Territories

On July 1, Wisconsin's bear hound training season begins. Approximately 12,000+ unleashed hounds are released into northern Wisconsin's forests—from bait sites where wolves have been conditioned to visit.

Hounds run for miles, often 5–15 miles from their handlers. They run through wolf rendezvous sites where pups are being raised. Wolves, being territorial predators, respond exactly as any territorial predator would: they attack the intruders.

Step 4: Wolves Kill Hounds—Hunters Demand Revenge

The result is entirely predictable:

- **2020:** 42 bear hunting hounds killed by wolves
- **2021:** 78 hounds killed—up 86%
- **2024:** 24 hounds killed, 10 injured

When hounds die, hunters do not blame the system that sent their dogs into wolf territories. They blame the wolves. Calls for expanded wolf hunts, higher quotas, and fewer restrictions intensify. Social media fills with posts advocating illegal wolf killing.

I see it all the time—hunters furious that wolves are at bait sites, as if wolves are trespassing on territory the hunters own. But wolves were there first. The bait is in wolf territory. The hunters created the conflict, then demand revenge for the conflict they created.

Step 5: Poisoning Campaigns

Since 2018, someone has been poisoning wolves and other animals in northern Wisconsin. Wolf Patrol investigations have documented poisoned wolves, raptors, otters, raccoons, and even hunting dogs—all killed by meat laced with fast-acting insecticide.

The poisonings are concentrated in Forest, Florence, and Marinette Counties—the exact counties where bear hound deaths from wolf encounters are highest.

Step 6: The Cycle Repeats

Wolf hunts are framed as "conflict reduction." But February 2021 proved that hunts do not reduce conflict. Wisconsin's Green Fire found that "the delisting in 2021 did not result in reduced depredation" and that "the February 2021 wolf harvest was not likely to produce benefits for reducing livestock depredations because hunting was mostly away from farm areas."

The wolves killed in hunts are not the wolves causing conflicts. The conflicts are caused by baiting and hounding. Killing 218 wolves in 72 hours did not stop baiting. It did not stop hounding. It did not break the cycle. It just killed wolves.

The only way to break this cycle is to end unlimited baiting, restrict hounding in wolf territories, and stop treating revenge as wildlife management.

PART TEN: THE COMPLIANCE FANTASY

The permanent wolf rules assume that hunters will comply with regulations. This assumption is fantasy.

The February 2021 hunt demonstrated coordinated, intentional noncompliance. Hunters were encouraged on social media not to report kills immediately. Hunters exceeded quotas in every single zone. This was not accident. This was strategy.

Repeat Claimants and Criminal Records

A 2014 investigation by Wisconsin Watch found that between 2004–2013, the state paid approximately 150 claims for hunting dogs killed by wolves. Of these, 31 claims came from just 14 individuals who filed more than one claim—including one hunter who filed four times. A total of \$82,236 went to these repeat claimants.

At least four individuals who received compensation for wolf-killed dogs had **prior criminal convictions for hunting-related offenses**. The DNR confirmed: "There is nothing in the legislation or state statute that would exempt someone with a criminal or hunting violation from getting compensation."

Out-of-State Profiteers

Six individuals who lived in other states received \$28,086 in compensation for 10 dogs lost while hunting in Wisconsin. No residency requirement. No accountability.

The Poaching Surge

University of Wisconsin–Madison researchers estimated that in addition to the 218 wolves killed in February 2021, **between 98 and 105 additional wolves were killed through cryptic poaching**—illegal kills never reported and never counted.

Combined with the legal hunt, this represented a **27% to 33% decline in Wisconsin's wolf population in a single year**.

Previous research showed that wolf poaching *increases* when legal protections are relaxed—regardless of how many wolves are legally killed. The policy signal of delisting tells would-be poachers that wolves are less valued.

What This Means

The permanent rules rely on compliance. But the people these rules are meant to regulate are not compliant people. They are hunters who coordinated to delay reporting kills, who intentionally exceeded quotas in every zone, who file repeat compensation claims while continuing to run dogs in wolf caution areas, who have criminal hunting convictions yet still receive taxpayer compensation, and who poison wolves in retaliation.

These are not sportsmen. These are poachers.

PART ELEVEN: THE BEAR CUB DOUBLE STANDARD

Wisconsin law prohibits shooting a bear sow accompanied by cubs. The reasoning is straightforward: killing a mother bear leaves dependent cubs to starve. It is considered unsporting, unethical, and biologically destructive.

Wolves receive no such protection.

Under Wisconsin law and the permanent rules, hunters can kill:

- A breeding female wolf during pregnancy
- A nursing mother wolf with dependent pups
- An alpha male whose pups depend on him for food delivery
- Both parents of a litter, leaving pups to starve
- Every adult member of a pack, orphaning all juveniles

There is no prohibition on killing wolves with dependent young. There is no closed season during denning. There is no requirement to verify that a wolf is not a nursing mother before shooting.

Protection	Bears	Wolves
Cannot shoot mother with cubs	YES	NO
Cannot shoot during nursing season	YES	NO
Cannot orphan dependent young	YES	NO
Recognition of family unit	YES	NO

Bear cubs and wolf pups are the same age during summer training and hunting seasons. Both are dependent on their mothers. Both will die if orphaned. Yet bear families are protected by law, and wolf families are legal targets.

This is not a biological distinction. It is a political one.

If it is unethical to orphan bear cubs, it is unethical to orphan wolf pups. If it is unsporting to shoot a sow with cubs, it is unsporting to shoot a wolf with pups. If family integrity matters for bears, it matters for wolves.

PART TWELVE: SOCIAL AND CULTURAL DAMAGE THAT PERSISTS IN 2025

Four years after February 2021, many rural residents still live with the aftermath—not just in memory, but in their daily lives.

Many landowners in wolf range counties still refuse to post "No Hunting" signs out of fear of retaliation. Some residents reported being threatened for simply asking hunters to leave their land. As of 2025, several households keep loaded firearms by their beds—not for wolves, but for armed trespassers with dogs.

One resident from Washburn County stated: "I'm not afraid of wolves. I'm afraid of the people they attract."

Children continue to fear the woods and roads near their homes. Some refuse to walk to the school bus stop alone—a behavior that began after February 2021 and persists to this day. One Douglas County parent wrote: "She used to love the woods. Now she won't go outside alone. The counselor says it's trauma. Four years later, and she's still afraid."

Multiple tribal nations were deeply angered by the state's failure to honor the 81-wolf tribal allocation. The Voigt Intertribal Task Force described the hunt as a "violation of sovereignty" and "resource theft." The entire tribal allocation was obliterated before tribes could act.

This led directly to Act 100 (2023), which grants tribes emergency closure power over wolf units—an implicit admission by the Legislature that the DNR cannot be trusted to honor treaty obligations during a wolf hunt.

PART THIRTEEN: THE PERMANENT RULES—COSMETIC CHANGES, IDENTICAL OUTCOMES

On November 1, 2025, Wisconsin's permanent wolf hunting rules (NR 10.105) took effect, replacing the emergency rules (EmR1210) that governed wolf hunts since 2012. The DNR characterized these as "tougher regulations."

Our conclusion is unambiguous: The permanent rules are the emergency rules with cosmetic modifications. Every mechanism that enabled the 2021 disaster remains legal. The rules are designed to survive litigation, not protect wolves.

The Three "Major" Changes—And Why They Don't Matter

1. Registration Window: 24 Hours → 8 Hours

The claimed fix: Faster reporting prevents quota overshoot.

The reality: In 2021, hunters didn't accidentally forget to report—they coordinated intentional delays via social media to maximize kills before zone closures. Eight hours provides ample time for the same coordination. A wolf killed at 6 PM doesn't need to be reported until 2 AM.

The deeper problem: Registration relies entirely on self-reporting. There is no independent verification. No GPS requirement. No mandatory check stations. Eight hours of bad-faith delay is functionally identical to twenty-four hours of bad-faith delay.

2. Hound Training: "Only During Wolf Season"

The claimed fix: Prevents year-round harassment of wolves.

The reality: Bear hound training season (July 15–August 31) occurs in identical territory during the most vulnerable period for wolf pups. Bear hound training IS wolf encounter training. The dogs learn the same scents, the same chase behaviors.

The 2021 hunt proved training is unnecessary anyway. Hounds hadn't legally pursued wolves since December 2014—over six years. Yet 86% of wolves killed were killed by hounds. Either illegal training occurred, bear training served as wolf training, or training provides no meaningful advantage. All three explanations render this restriction irrelevant.

3. Den Disturbance: Prohibited

The claimed fix: Protects vulnerable pups.

The reality: Wolf hunting season runs November through February. By November, pups are 6–7 months old. They're not in dens—they haven't been since May. The "den protection" covers empty holes in the ground.

The period when pups ARE vulnerable (April–September) overlaps with bear baiting and bear hound training. No protection exists during actual vulnerability.

What the Permanent Rules Retained

Night Hunting: Legal. Wolves can be hunted from half-hour after sunset to half-hour before sunrise with artificial lights, thermal imaging, and night vision. Sitting over bait with military-grade optics, waiting for a habituated wolf to approach in darkness. This isn't hunting—it's execution.

Six-Dog Pack Limit: Per Hunter, Not Per Wolf. Four hunters can legally coordinate twenty-four dogs on a single wolf. Guide services can run multiple clients simultaneously. Nothing prevents this.

Baiting: Expanded. Ten gallons per site, no limit on number of sites. Combined with bear baiting (April–October), this creates year-round food habituation.

Zone-Specific Tags: Paperwork Theater. Hounds can push wolves 5–15 miles during pursuit—easily crossing zone boundaries. The tag system tracks paperwork, not wolf movement.

Guiding Services: Zero Regulation. No licensing. No insurance. No client limits. No restrictions on concurrent operations.

Quota System: Trophy Hunting Disguised as Conflict Management. Zone A (70–80% national forest, lowest depredation) gets 80 wolves. Agricultural zones with actual conflicts get fewer tags. This is recreational trophy allocation.

No Population Goal. The management plan commits to nothing. No floor. No minimum. No commitment to any population level.

2021 Failures vs. Permanent Rule "Fixes"

2021 Failure	What Happened	Permanent Rule	Why It Won't Work
99-wolf overshoot	218 killed against 119 quota	8-hour registration	Intentional delay was coordinated; 8 hours allows same
82% killed by hounds	Organized packs overwhelmed wolves	6-dog limit retained	Per-hunter limit; multiple hunters coordinate unlimited dogs
Entire packs eliminated	3–4 packs destroyed	Zone-specific tags	Zone-pushing; wolves chased across boundaries
Pregnant females killed	Necropsied females carrying fetuses	No protection added	Season runs through February—peak pregnancy
Pups orphaned	Nursing mothers killed	Den disturbance ban	Dens empty by November; rendezvous sites unprotected
Social media coordination	Hunters delayed reporting	Nothing	Not addressed
Guide service exploitation	Commercial operations maximized kills	No regulation	Zero licensing or limits

2021 Failure	What Happened	Permanent Rule	Why It Won't Work
Night hunting cruelty	Wolves shot over bait after dark	Stationary position required	Still allows thermal/night vision and bait
Tribal quota ignored	State hunters took entire quota	Zone allocation	No mechanism to honor tribal rights

The Legal Strategy

The permanent rules' actual purpose becomes clear when viewed through a litigation lens.

The February 2021 hunt was halted by court order partly because the DNR operated under emergency rules that had never undergone permanent rulemaking. Judge Jacob Frost's injunction specifically noted the need for proper rule promulgation.

The permanent rules satisfy the procedural requirement. They underwent public comment, Natural Resources Board approval, legislative review, and formal publication.

The rules don't prevent another 2021—they prevent another successful lawsuit about the rules themselves.

As Wisconsin Examiner reported: "DNR officials have warned that a future hunt without permanent rules in place could be halted by the court system."

The permanent rules exist to foreclose that specific legal vulnerability. Their content is secondary to their procedural validity.

PART FOURTEEN: COMPARISON TO OTHER STATES

Wisconsin is an outlier in cruelty, laxity, and risk.

Minnesota and Michigan both have wolves, similar habitats, and similar agricultural landscapes. Both states:

- Prohibit use of hounds on wolves
- Ban hound training on wolves entirely
- Ban night hunting
- Ban baiting wolves
- Use daylight-only firearm rules
- Impose limits on technology
- Incorporate tribal science in planning

- Do not compensate dog owners for wolf conflicts

Even states with aggressive wolf policies—Idaho, Montana, and Wyoming:

- Require licenses for hound training
- Restrict night optics in certain zones
- Require trap checks
- Ban vehicle pursuit
- Impose hunter education requirements

Wisconsin is the **only state** that combines: unlimited unlicensed hound training, no reporting requirements, no restrictions on pack size, night hunting with full technology, baiting without limits, snowmobile and vehicle chase allowances, compensation for hounds killed while trespassing into wolf rendezvous sites, and legalized pursuit of a federally protected species during training seasons.

This is not "traditional." This is an outlier system built around one constituency: the hound lobby.

PART FIFTEEN: WHAT ACTUAL, MEANINGFUL REFORM MUST LOOK LIKE

The February 2021 wolf hunt was not just a failure of wildlife management. It was a systemic collapse of public safety, a breakdown in intergovernmental coordination, and a stunning example of how policy designed to avoid lawsuits can create new forms of harm.

The DNR's 2025 permanent rules do not go far enough. To truly prevent a repeat of 2021, meaningful, enforceable reforms must be enacted.

1. Pass AB 907 and SB 844

These bipartisan bills would create the strictest hound-hunting regulations in Wisconsin history:

- Mandatory GPS tracking collars on all hounds
- Hound-handler certification through DNR-approved training
- Minimum liability insurance for all hound hunters
- Real-time DNR access to active dog locations
- Violations tied to license suspension or revocation

Every single trespass incident in February 2021 involved hounds running off-leash and out of sight, with no handler accountability. This bill ends that era.

2. Create a Unified Trespass and Conflict Complaint Database

Currently, DNR wardens and county sheriffs maintain separate, non-synced systems. This enables jurisdictional confusion, hides repeat offenders, and undermines public trust.

What's needed: a shared digital platform with incident logging, map-based tagging, public transparency, automatic escalation for repeat violators, and a public reporting dashboard.

3. Require Written Landowner Permission for Hound Pursuit

Current law allows hunters to release hounds near private land without consent. The new standard: any hound pursuit must have prior written permission before dogs cross property lines. Hunters must carry proof of permission.

Private landowners should not have to defend their boundaries with guns or cameras. The burden must shift to those releasing animals.

4. Establish a Permanent, Balanced Wolf Management Stakeholder Council

Wisconsin's wolf policy has been dictated by political appointees and hunting lobbyists. Reform requires equal representation from tribal governments, conservation scientists, private landowners, non-hunting rural residents, and ethical hunters not affiliated with trophy organizations.

Science, not lawsuits, should decide quotas. Public safety, not pressure, should guide access rules.

5. Fund Real Non-Lethal Conflict Prevention

Decades of research show that non-lethal deterrents reduce wolf-livestock conflict far more effectively than public hunts. Yet Wisconsin spends 10 times more on compensation than prevention.

Required: funding for fladry kits, shock fencing, range riders, guardian animals; direct technical assistance to farmers; conflict-prevention grants for all counties in wolf range.

6. Ban Hounds Entirely in Wolf Hunting and Training

No state besides Wisconsin allows hounds on wolves. Hounds create unregulated lethal conflict, uncounted wolf mortality, pack disruption, trespass, chaos that cannot be policed, and cruelty that violates basic animal-welfare standards.

If hounds were banned, most of the chaos in Wisconsin's wolf system would collapse immediately.

7. Prohibit Night Hunting, Thermal Imaging, and Night Vision

No enforcement system can regulate these tools in remote forests at 2 AM. Other states ban them because night technology eliminates fair chase and enables cruelty.

8. Establish Pup and Breeding Season Protections

Wolves have dependent pups from April to August. Killing adults during this time leaves pups to starve. Other states prohibit hunting during breeding season. Wisconsin does not.

9. Repeal or Restructure Act 169

Act 169 is the root legal architecture that forces the DNR to manage wolves backward—starting with the assumption that hunting must occur. Repealing Act 169 would allow science-driven quotas, real conservation management, flexibility for federal relisting periods, tribal sovereignty compliance, and cruelty-focused reforms.

PART SIXTEEN: THE FINAL ARGUMENT

The Agency Is Protecting Itself, Not Wolves

Everything in the permanent wolf rules—every clause, every administrative tweak, every boundary change—reflects a structure designed to protect the DNR, not wolves. The rules are built around a single assumption: if the agency can demonstrate it followed procedure, it cannot be blamed for the outcomes.

But management is not a paperwork exercise. Management requires enforceability, biological integrity, humane standards, and transparency. The permanent rules fail on all four.

If the agency cared about wolves, the permanent rules would have:

- Prohibited hounds
- Banned thermal imaging
- Banned night hunting
- Protected pups
- Enforced boundaries
- Restricted baiting
- Created real oversight
- Acknowledged pre-season mortality
- Addressed hunter misconduct
- Required non-lethal conflict prevention
- Ensured tribal treaty compliance
- Dismantled the compensation fraud system

Instead, the rules focus on reporting timelines, administrative clarity, zone maps, and legal defensibility. These are not reforms. These are shields.

Wolves do not benefit from them. Hunters do not change because of them. Wardens cannot enforce them. Science does not support them. Tribal treaty partners are not protected by them.

The only entity safer under these rules is the agency itself.

Any Natural Resources Board member, legislator, or public official who supports these rules—knowing what wolves have endured, knowing how 2021 unfolded, knowing how hunters behave, knowing how enforcement fails—is endorsing cruelty, legitimizing chaos, and enabling another slaughter.

These rules do not reflect balance. They reflect surrender. They are camouflage.

And we refuse to accept camouflage when lives are at stake.

CONCLUSION

February 2021 was not a "hunting season." It was a preventable, court-ordered, agency-abetted catastrophe that terrorized rural families, shredded wolf packs during breeding season, and produced zero reduction in livestock conflict.

Four and a half years later, the DNR's answer is procedural tweaks designed to survive the next legal challenge—not to prevent the next gate from being ripped off its hinges.

These are not anonymous internet comments. These are sworn, notarized statements from real people who still live with the fear. None of the experiences described in the 23 affidavits are addressed—in any way—by an 8-hour kill-reporting deadline or a ban on year-round hound training.

This is why we did not support the DNR's permanent rules.

The rules let the agency off the hook. They do nothing for wolves. They do nothing for the rural residents who were terrorized. They do nothing to prevent another 2021.

The people of northern Wisconsin, the tribes, and the wolves themselves deserve the real reforms outlined in this report.

Respectfully submitted,

December 6, 2025

SOURCES

Summary

The provided text consists of references to key Wisconsin statutes, administrative codes, legislative acts, and a federal court case related to wolf management, hunting regulations, and depredation compensation programs. These are presented in the context of critiquing Wisconsin's wolf harvest rules, highlighting potential risks of overharvest, animal cruelty, and systemic biases toward hunters. The recommendations suggest statutory and regulatory amendments to address these issues, promoting ethical hunting, fraud prevention, and balanced wildlife management. Overall, the purpose appears to be advocacy for reforms under state law while acknowledging federal Endangered Species Act (ESA) intersections, with a focus on reducing ambiguities that could lead to litigation or exploitation.

Key Issues

- **Compensation Without Accountability**
 - o Wis. Stat. § 29.888 authorizes payments for wolf-caused hound losses without deductions for negligence, potentially incentivizing reckless behavior and fraud, as claims are not cross-checked against private insurance; this deviates from standard wildlife damage programs in other states, which often include negligence bars to encourage responsible practices.
- **Permissive Hunting Methods**
 - o Wis. Admin. Code NR 10.105 allows broad methods like night hunting, electronic calls, and hound use without significant restrictions on technology (e.g., thermal imaging) or group sizes, risking prolonged animal suffering and pack disruption; minor 2025 updates (e.g., shortened reporting) do not address core ethical concerns, creating ambiguities in enforcement during delisted periods.
- **Mandatory Hunts with Limited Discretion**
 - o 2011 Wisconsin Act 169 mandates seasons upon ESA delisting but sets only minimum requirements, potentially obligating rushed hunts (as in 2021) without adequate safeguards; this could conflict with tribal treaty rights or federal recovery standards, leading to overharvest and legal challenges.
- **Potential Overlap with Animal Cruelty Laws**
 - o Wis. Stat. § 951.08 broadly prohibits instigating animal fights, with felony penalties; while legal hunting is not explicitly exempted, hound-wolf pursuits may indirectly violate this if viewed as provoked clashes for sport, raising ambiguities in application to wildlife management.
- **Delisting Vulnerabilities**

- The referenced case underscores flawed federal delistings under the ESA, reinstating protections due to inadequate analysis; state hunts triggered by delistings risk similar oversights, exacerbating population instability and public safety issues like trespass during chaotic seasons.

Legal References

- Wis. Stat. § 29.888: Authorizes the Department of Natural Resources (DNR) to pay claims for damage caused by wolves to livestock, hunting dogs, or pets, with payments limited to fair market value (up to \$2,500 for dogs) plus unlimited veterinary bills for injuries; funded by endangered resources fees and plates; requires verification by DNR (e.g., necropsy) within 14 days of claim filing, with no deductions for negligence or requirement to disclose private insurance.
- Wis. Admin. Code NR 10.105: Regulates wolf harvesting, permitting methods such as firearms (including rifles and shotguns), bows/crossbows, dogs (up to 6 for trailing/baying after deer season), electronic predator calls, non-animal bait, and night hunting; includes 2025 updates like 8-hour kill registration, zone-specific tags, and 1,000-foot den disturbance buffers, but no bans on high-tech aids like thermal imaging; tags must be attached immediately, with closures exempt from standard rulemaking.
- 2011 Wisconsin Act 169 (codified at Wis. Stat. § 29.185): Mandates annual wolf hunting and trapping seasons (October 15 to end of February) upon removal from federal endangered species list under the ESA (16 U.S.C. §§ 1531-1544); requires DNR to issue licenses via lottery/preference system, divide state into zones, and allow methods like firearms, dogs, calls, and bait; provides DNR discretion for additional rules, quotas, and closures, with fees funding depredation programs.
- Wis. Stat. § 951.08: Prohibits instigating, promoting, or participating in fights between animals (Class I felony for first offense; Class H for subsequent), owning/training animals for fights, or spectating (Class A misdemeanor); no explicit exemptions for legal hunting, though rodeo events are permitted; violators face 5-year bans on animal ownership.
- *Humane Society of the United States v. Zinke*, 865 F.3d 585 (D.C. Cir. 2017): The D.C. Circuit Court reinstated ESA protections for gray wolves in the Western Great Lakes region, holding that the U.S. Fish and Wildlife Service's 2011 delisting rule was arbitrary and capricious under the Administrative Procedure Act (5 U.S.C. §§ 551 et seq.) for failing to adequately analyze impacts on the species' broader recovery; this precedent influenced subsequent delistings and state hunts, including Wisconsin's 2021 overharvest following a temporary delisting.