June 12, 2012

 To: Bill Vander Zouwen, Wildlife Section Chief

Bill:

As a practicing veterinarian with over 40 years of experience I have some questions regarding the population modeling being used in the development of the rules used to implement act 169. Animals are not just numbers. They are not beans in a jar where you can pour out a few and be confident on how many remain in the jar. They have complex relationships with each other and with their environment. It is my observation that smaller the objective (goal) and the closer one must come to that objective, the more precise one must be. A population goal of 350 wolves raises some doubts and questions in my mind.

The first questions deal with disease. In my veterinary practice I have observed epidemics of parvovirus in the canine populations I care for. Those episodes were sporadic and completely unpredictable. Virulence varied greatly from outbreak to outbreak. At times mortality approached 100% in young unvaccinated dogs and even older dogs died. Wolves have been afflicted with parvovirus epizootics across their range. Indeed a parvovirus outbreak reduced the wolf population on Isle Royale from 50 to just 12 wolves. That is 76% mortality. What considerations were given to mortality from parvovirus in your model? If not, what peer-reviewed research assures you that an outbreak of a particularly virulent strain of parvovirus could not cause another event similar to Isle Royale?

All canines including wolves are susceptible to infections of sarcoptic mange. Mange can and does result in varying rates of mortality in wolves. It is commonly held that stress exacerbates the effects of mange. While mange may only affect 5 to 10% of wolves, one out break affected up to 60% of wolves in Wisconsin. Do you know if the stress from being hunted 24 hours a day for 5 months (over the winter) will exacerbate the impact of mange on the wolf population? Hair loss from mange increases caloric requirements needed to maintain body temperature. Do you know if continual pursuit by hunters and trappers will disrupt the wolves' normal hunting behavior and make it more difficult for the wolves to meet those caloric requirements? What, if any, rate of mortality from mange was factored into your model? Please cite the peer-reviewed research underlying those assumptions.

The alpha female is generally the only breeding female in a pack. If the alpha female is removed from the pack, how long does it take for another female to become the alpha and breed? If the alpha female is lost in January, will that pack be successful in producing pups that year? If she is lost in December will the pack reproduce successfully? What impact will the loss of the alpha male have on pack reproduction? Was the impact of disruption of the pack's social structure factored into the recruitment numbers? What was the value used for recruitment? Again, what peer-reviewed research underlies your assumptions?

It appears to me that the department has little control over mortality from depredation control and landowner killings. Were those loses factored in to your model? At what level were they factored in? What is your confidence level for those numbers? I have the same questions

regarding illegal kill during deer season. Since pack structure will be disrupted, will dispersing pack members be at greater risk of illegal kill during the deer season than is now the case?

Quotas and goals are only as good as the ability to monitor and enforce them. I have reviewed correspondence between the DNR and GLIFWC regarding furbearer harvest back to 1996. State licensed hunters and trappers have repeatedly exceeded the agreed upon biological quota for fisher, otter and bobcat. The department has chronically demonstrated an inability and or unwillingness to control the excess harvest. Department information on the wolf rule refers to proposed quotas as being "conservative". In 2001, Steve Miller wrote: " … Our goal is to conserve bobcat populations while providing reasonable harvest opportunities for trappers and hunters. Conserving the population is our first priority and our management decisions are based on that priority. … Our harvest quotas are set very conservatively, so we can assure the harvest will not prevent the bobcat population from remaining at or above our population goal. In the case of a low bobcat population year, quotas would be even more conservative. We know that hunter and trapper success rates vary annually, so we set conservative quotas that take this into account. The actual quota that would be biologically feasible – while still allowing us to meet our bobcat population objectives—would be substantially higher than the harvest quotas we use." Mr. Miller also writes: "We have a policy that ensures conservative bobcat harvests over the long run." In 2005, Laurie Osterndorf wrote: "We believe our current harvest protocols – quota and permit level setting policy, adequately protects the state and tribal interests in fur bearers, namely fishers, bobcats and otters." But it appears the current result of that "conservative" and protective management is: Fisher, 30% below goal with overharvest of 6% last year. Otter, 21% below goal with 23% overharvest last year. Bobcat, 14% - 43% below goal with no overharvest last year. Given the departments past performance in furbearer management, what assurance can you give me that the proposed conservative quotas will not produce a similar result?

Act 169 requires reporting within 24 hours of harvesting a wolf. Last year when I inquired about adopting a phone or E-mail system for registering deer, I was told there were problems with that in that the experience in states allowing that type of registration found that not everyone reports. What percentage compliance was factored into your model? If the department waits until 100% of the quota is reached before closing the season, what amount of overharvest do you project?

Please review for me the tagging, possession and transportation requirements regarding wolf harvest. If non-permitted hunters are allowed to aide in the hunt, will they be armed if other seasons are closed? Will group hunting be allowed? If so, there will be inadvertent harvest. How does your model account for this?

I understand that some of the early model runs showed a continuous decline in population but that eventually one was developed that showed the population stabilizing. What inputs were changed to achieve that stability?

Please consider this a Board Member request with written response requested.

Sincerely, David E. Clausen