

For those interested in commenting on Wisconsin Department of Natural Resources and Wisconsin Conservation Congress proposals and questions related to wildlife and habitat management, we offer the following assessment of several of these proposals.

Proposed Statewide Wildlife Management Rule Changes

- Question 31: Prohibiting the use of electronic turkey decoys for turkey hunting.

These devices make it easier for hunters to kill turkeys. Even many hunters are opposed to the use of such devices for ethical reasons. HSUS suggests support for this proposed rule change.

- Question 35: Creating consistent standards for body-gripping type traps (trap size restrictions). This proposed change is apparently intended to reduce capture and killing of non-target animals—particularly dogs—in body-gripping (conibear type) kill traps by prohibiting the use of body-gripping traps greater than 42 square inches between the jaws on dry land (unless the trap is set partially underwater). This proposed change would allow larger traps (up to 62 square inches between the jaws) on dry land if they are set at least five feet off of a surface and are set inside of an enclosure. HSUS suggests that activists question whether even these changes will be sufficient to eliminate non-target captures of dogs, especially smaller dogs. You may also wish to question whether non-target captures of cats has occurred and, if so, whether the rule change would reduce the incidence of cat captures. Though we suggest that this rule change should be supported as a *marginal* improvement in terms of reducing non-target kills of dogs by this kind of trap, activists may want to take this opportunity to voice general opposition to these traps for killing wildlife.

- Question 36: Landowners ability to protect their domestic animals from wolves.

This proposed rule change, if passed, would go into effect after wolves are federally “delisted” (i.e. after they lose all federal protections under the Endangered Species Act). The rule would allow a landowner, lessee, or occupant on private land to shoot and kill any gray wolf in the act of attacking domestic animals. The HSUS opposes this proposed rule change, regardless of the status of the gray wolf federally. The primary problem is that it does not require landowners to implement common-sense non-lethal means of protecting their livestock or other domestic animals from predation by wolves. It may sometimes be necessary to kill a wolf that is not deterred by non-lethal measures and is in the act of attacking livestock. However, this rule change would give landowners the authority to kill wolves without also giving them the responsibility to implement sound livestock husbandry and other protective measures that should decrease the need for any lethal control. We suggest that activists oppose this proposed rule change.

Proposed Local Wildlife Management Rule Changes

- Question 39 (Sheboygan County): Establishing a deer hunting season at Kohler-Andrae State Park. This proposed rule would allow deer hunting in a state park that has been a wildlife refuge for more than 75 years. There are concerns regarding deer-vehicle collisions in the areas around the park and these are certainly legitimate and serious concerns. However, this rule also appears to be driven by deer damage to residential gardens on private lands near the park. This is a sensitive issue due to the concerns regarding deer-vehicle collisions and the loss of human life that can result. We suggest that activists question whether the rate of deer-vehicle collisions is actually higher near the park as opposed to other areas of the county, or whether this is simply the perception of local residents. You may also wish to point out that hunting deer in itself has, in some circumstances, actually increased deer movement and the risk of deer-car collisions. Removing a number of

deer through hunting is unlikely to significantly reduce the risk of deer-vehicle collisions or the damage to the gardens of nearby residents because deer will still be present, just at slightly reduced density. Further, the deer removed in the hunt are clearly occupying an area with high-quality deer habitat; removing some deer will allow others from neighboring areas to move in. The HSUS suggests opposition to this proposed rule change.

- Question 40 (Walworth County): Establishing a “no entry wildlife refuge” at the Turtle Valley Wildlife Area. This proposed rule change would establish a 250-acre waterfowl refuge that would be closed to waterfowl hunting; this area would be within the larger, 2300-acre Turtle Valley Wildlife Area, which may be expanded to as much as 5,550 acres in the future. Deer hunting, small game hunting, and trapping would still be allowed on the proposed refuge area. These activities, in addition to waterfowl hunting, would also be allowed on the rest of the Turtle Valley Wildlife Area. The HSUS suggests support for this rule change, but activists may wish to point out that (1) this would not be a true “refuge” if animals other than waterfowl can still be hunted and trapped and (2) the 250 acres of “refuge” would take up only a bit more than 10% of the current acreage of the Wildlife Area (and only around 5% of the possible future acreage of the Wildlife Area). You may wish to suggest that the “refuge” portion be expanded either in the protection offered to wildlife (by not allowing any hunting or trapping on the refuge portion) or in the size of the refuge, or (preferably) both.
- Question 41 (Lincoln, Price, and Taylor Counties): Eliminating the bear hunting “no dog zone” in bear management Zone A. This would allow the use of hounds in bear hunting in a small area of northern Wisconsin (within management Zone A) that has previously been closed to the use of hounds in bear hunting. Hunting bears with hounds clearly impacts the welfare of the bear, which may be subjected to a long chase and may be attacked by the dogs when finally chased to exhaustion. The dogs, too, maybe wounded by the bear in an encounter. However, bear hounding in northern Wisconsin raises an additional problem because this area is also home to the gray wolf. When hunting dogs enter a wolf pack’s territory, wolves sometimes react the way they would if another wolf or a coyote entered their territory – by attacking (and sometimes killing) the intruder. This is a natural territorial response, but when such an attack occurs, hunters often demand the killing of the wolf or wolves involved and lobby for the chance to hunt or trap wolves in the future (after federal delisting of the gray wolf). It is tragic when a dog is killed by wolves, but in the case of hunting dogs this is ultimately due to the negligence of the hound’s owner, who allows his/her dogs to roam unsupervised in wolf habitat. The HSUS suggests strong opposition to this proposed expansion of the area in which the use of hounds to hunt bear is allowed.
- Question 42 (Barron, Chippewa, Dunn, Polk, Rusk, and St. Croix Counties): Creating a subzone in bear management Zone C where the use of dogs would be allowed. The HSUS suggests strong opposition to this proposed expansion of the area in which the use of hounds to hunt bear is allowed. See explanation above for Question 41.

Wisconsin Conservation Congress Executive Council Advisory Questions

- Question 47: Lowering the hunting age. The Wisconsin Conservation Congress seeks to lower the hunting age in Wisconsin from 12 to 10 years old. The HSUS suggests strong opposition to this recommendation.

Wisconsin Conservation Congress Environmental Practices Committee Question

- Question 54: Providing increased protection to Wisconsin rivers, creeks, and streams. This recommendation suggests that portions of rivers, creeks, and streams currently classified as the “default” category of “warm water sport fishery” should instead be classified as “exceptional resource waters” (and the default category would be eliminated). It appears that such a change would offer these waterways more protection from the

impacts of urban development and this should ultimately benefit wildlife. The HSUS suggests support for this recommendation.

Wisconsin Conservation Congress Fur Harvest Committee Question

- Question 56: Bobcat harvest zone expansion. The Wisconsin Conservation Congress seeks to expand the area of the state in which bobcats can be hunted and trapped, simply to provide more opportunities for recreational hunters and trappers. This question suggests that a temporary season could be established to collect data that would help the DNR to estimate the bobcat population in this area of the state (south of State Trunk Highway 64 and north of State Trunk Highway 29). There are two problems with this recommendation. First, there are ethical problems associated with any expansion of bobcat hunting and trapping from the perspective of the welfare of bobcats and the welfare and/or conservation of any non-target animals caught in traps set for bobcats. Second, the use of “harvest” data to estimate the size of wildlife populations may not be a reliable or accurate population estimation method. The Conservation Congress admits that there is an “absence of population data” on bobcats in this area of the state, yet they nevertheless propose to allow hunting and trapping in this area. If anything at this point, the DNR should census the bobcat population in this area using methods that do not involve recreational hunting and trapping – in other words, estimate the bobcat population without permanently removing bobcats from the population. The HSUS suggests opposition to this recommendation.
- Question 57: Damage control fur utilization. The Conservation Congress seeks to allow the sale of furs taken by nuisance wildlife control trappers. This would provide a financial incentive for nuisance control operators to use lethal, rather than non-lethal, methods for addressing human-wildlife conflict situations. The HSUS suggests opposition to this recommendation.

Wisconsin Conservation Congress Hunting With Dogs Committee Question

- Question 59: Zone A ruffed grouse extended season. The Conservation Congress seeks to extend the ruffed grouse hunting season for the northern management area of the state (Zone A). The only justification for this expansion appears to be to allow for increased recreational hunting opportunities. The HSUS suggests opposition to this recommendation.
- Question 60: Bobcat zone expansion. This is very similar to Question 56 above except that it has to do only with recreational hunting and trapping without any attempt to portray it as “data collection.” The HSUS suggests opposition to this recommendation.
- Question 61: Fisher season. The Conservation Congress seeks to allow hunting of fishers in addition to trapping of these animals. The HSUS suggests opposition to this recommendation.
- Question 62: Feral cats. The Conservation Congress seeks to reclassify feral cats as an “unprotected species.” This would allow cats lacking visible identification to be shot. The HSUS strongly suggests opposition to this recommendation. (Please refer to our alert on this question.)

Wisconsin Conservation Congress Outdoor Heritage Question

- Question 66: Atlatl and dart use for harvest of fish and game. The Conservation Congress seeks to allow the use of yet another type of primitive weapon for hunting (and apparently for fishing as well). They suggest that the atlatl and dart are essentially equivalent to the bow and arrow. From an animal welfare perspective, this will likely translate into high wounding rates, especially while these weapons are new and most users are unskilled

in their use. This recommendation reflects the Conservation Congress' consideration for recreation and sport at the expense of animal welfare. The HSUS suggests opposition to this recommendation.

- Question 67: First year hunters. The Conservation Congress seeks to allow new hunters to hunt without taking the required hunter education course (with the stipulation that such hunters hunt under the direct supervision of a licensed adult hunter). This is intended as a way to encourage recruitment of new hunters because, as the question states, “the requirement to take a basic hunter education course is a limiting factor (in recruiting new hunters).” This means that a child of legal hunting age (currently 12 years old) or an adult who has never hunted before could take to the woods for their first year, foregoing even the most basic training regarding the safe and responsible use of hunting weapons or the meaning of ethical concepts related to hunting. There is absolutely no justification for this recommendation. The HSUS suggests opposition to this recommendation.