



September 10, 2018

To: Scott Karel, Regulations Specialist
Bureau of Wildlife Management
101 S. Webster Street
Madison WI 53707-7921

Re: 2018-19 Ruffed Grouse Hunting Season Closure

We appreciate the concern expressed by the Natural Resources Board (NRB), Conservation Congress and citizenry regarding the status of Wisconsin's ruffed grouse populations and whether West Nile Virus (WNV) is a significant threat that requires a modification of our hunting season framework. Ruffed grouse are Wisconsin's most abundant game bird and deserve increased attention to ensure Wisconsin's management is well founded.

Current research shows that WNV can cause high mortality rates in young grouse, but its effects on adult grouse are unknown. Because WNV is episodic the potential impact on grouse populations likely varies from year-to-year. Research conducted in the 1980s within central and east-central Wisconsin has demonstrated that high hunting pressure can suppress grouse populations, particularly on public lands within fragmented landscapes. However other long-term data from northern Wisconsin and other states indicate that current seasons are sustainable. In addition, research in the eastern US indicates that grouse populations in high quality habitat are more readily able to compensate for WNV impacts than those in poor habitats. Passage of an emergency early closure does not take these important differences into account.

We believe a better understanding of the potential impacts of WNV on Wisconsin grouse populations is a complicated issue that requires additional understanding of the disease impacts on grouse, annual variations the disease severity and geographic distribution, the natural ability of grouse to recover from WNV outbreaks, and whether late season harvest is an important source of mortality

The Board made clear during its CWD rule discussions in August that it prefers a judicious use of emergency rules. You indicated that they should be reserved to those situations where it is clearly needed, and the action being taken will positively impact the situation. We support that philosophy and suggest the NRB pause to assess whether an earlier grouse season closure is truly needed and if it will improve grouse populations and associated hunting experiences.

Wisconsin's Green Fire is comprised of veteran natural resource managers and ecologists. We have substantial experience with wildlife diseases and the management and monitoring of ruffed grouse populations in Wisconsin and nationally. We understand the public's and NRB's desire for quick action, but in this case, we believe a thorough review of the ruffed grouse population status is warranted before rule-making is undertaken. We applaud the NRB, Congress and Department's commitment to update Wisconsin's Ruffed Grouse Management Plan by January 2020. This is the best process to thoroughly review the research on hunting and disease impacts and discuss whether season modifications should be undertaken.



Wisconsin is a large state with great variation in the landscapes that support grouse populations. Each landscape impacts grouse population dynamics and coupled with significant variation in hunter activity and harvest pressure can confuse the picture of how hunting seasons impact grouse populations. The dialogue between DNR staff, outside experts and the public as a new management plan is created will clear up the confusion and build consensus on how seasons should be framed going forward.

We recommend the NRB consider tabling any action on early season closure until 2019 when the 1st round of WNV surveillance is completed or, preferably, until 2020 when the new management plan is approved by the Board.

Thank you for consideration of our comments.

Tom Hauge

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Cc: Natural Resources Board
Secretary Dan Meyer
Eric Lobner – Director, Wildlife Mgmt
Larry Bonde & Dr. Mike Riggle – Wisconsin Conservation Congress

Wisconsin Green Fire is non-profit conservation organization formed in 2017 to be a voice for science-based management of our natural resources. Our 400 members have extensive natural resource management experience working for state, federal, private and non-profit entities. You can learn more about us at www.wigreenfire.org or on our Facebook page.