

# Quantifying the effects of delisting wolves after the first state began lethal management

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Predators and their protection are controversial worldwide. Gray wolves, *Canis lupus*, lost U.S. federal protection (delisting) on 3 November 2020 and the State of Wisconsin began lethal management first among all states and tribes that regained authority over wolves. Here we evaluated the initial success of reaching the state's explicit objective, "...to allow for a sustainable harvest that neither increases nor decreases the state's wolf population..." We used official state figures for hunter-killed wolves and population estimates from April 2017–April 2020 and the latest peer-reviewed model of individual wolf survival to estimate additional deaths resulting from federal delisting. More than half of the additional deaths were predicted to be cryptic poaching under the assumption that this period resembled past periods of liberalized wolf-killing in Wisconsin. We used a precautionary approach to construct three conservative scenarios to predict the current status of this wolf population and a minimum estimate of population decline since April 2020. From our scenarios that vary in growth rates and additional mortality estimates, we expect a maximum of 695-751 wolves to be alive in Wisconsin by 15 April 2021, a minimum 27-33% decline in the last 12 months. This contradicts the state expectation of no change in the population size. We draw a conclusion about the adequacy of regulatory mechanisms under state control of wolves and discuss the particular governance conditions met in Wisconsin. We recommend greater rigor and independent review of the science used by agencies to plan wolf hunting quotas and methods. We recommend clearer division of duties between state wildlife agencies, legislatures, and courts. We recommend federal governments reconsider the practice of sudden deregulation of wolf management and instead recommend they consider protecting predators as non-game or transition more slowly to subnational authority, to avoid the need for emergency relisting.

# 1 Quantifying the effects of delisting wolves after the first state began lethal management

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15

## 16 Abstract

17 Predators and their protection are controversial worldwide. Gray wolves, *Canis lupus*, lost U.S.  
18 federal protection (delisting) on 3 November 2020 and the State of Wisconsin began lethal  
19 management first among all states and tribes that regained authority over wolves. Here we  
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26 liberalized wolf-killing in Wisconsin. We used a precautionary approach to construct three  
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37 management and instead recommend they consider protecting predators as non-game or  
38 transition more slowly to subnational authority, to avoid the need for emergency relisting.

39

## 40 Introduction

41 Wolves and their protection are controversial worldwide and across the U.S. [1-6]. The U.S.  
42 Endangered Species Act (ESA) aims to remove listed species (delist) from federal protection  
43 once recovered but contingent on adequate regulations in subnational jurisdictions to keep  
44 them off the federal list. Two U.S. Presidential Administrations have proposed the removal of

45 federal protections for gray wolves (*Canis lupus*) nationwide but faced dissent by majorities (if  
46 not unanimity) of their official panels of scientists [7, 8]. The Trump administration went ahead  
47 anyway and transferred authority to states and tribes on 3 November 2020, declaring gray  
48 wolves recovered across most of the country under the Endangered Species Act, ESA [9]. That  
49 decision asserts that the species met the criteria of the five-factor analysis (ESA 16 USC § 1531  
50 Sec. 4(a)) among others. The five factors necessary for delisting altogether ensure the delisted  
51 species remains secure for the foreseeable future. One of those criteria is the adequacy of state  
52 and tribal (subnational) regulatory mechanisms [10, 11].

53

54 Whether delisted wolves are being managed with adequate regulatory mechanisms by  
55 subnational jurisdictions seems in part a scientific question (as opposed to a values-based  
56 question), because the adequacy of the mechanisms depends on their effectiveness in  
57 regulating factors that might reverse conditions and endanger wolves again. Chief among those  
58 factors for wolves has been human-caused mortality in five U.S. wolf populations, since modern  
59 monitoring [12], as in other regions [5, 13]. We present a data point to support scientific  
60 evaluations of the adequacy of regulatory mechanisms in subnational jurisdictions, for the first  
61 state to implement recreational hunting in the wake of federal wolf delisting on 3 November  
62 2020.

63

64 The State of Wisconsin wolf policy and management between 2020-2021 offers an interesting  
65 case study for the following reasons. Wisconsin was the first subnational jurisdiction to resume  
66 lethal management of wolves after delisting. The State wildlife agency (Department of Natural  
67 resources, DNR) was explicit about its goals for regulated wolf-hunting, “The quota's objective  
68 is to allow for a sustainable harvest that neither increases nor decreases the state's wolf  
69 population...” (<https://dnr.wisconsin.gov/topic/hunt/wolf/index.html> accessed 14 April 2021)  
70 and similar statements to media before the wolf-hunt [14]. There are two phrases and two  
71 parts of that objective that can be evaluated scientifically, that of “a sustainable harvest” and  
72 “neither increases nor decreases the state’s wolf population”. This language mirrors recent  
73 reviews of the topic that have estimated the average expected, threshold rate of human-caused  
74 mortality predicted to result in stability of wolf populations (i.e., no increase or decrease).

75

76 The estimates of stabilizing levels of human-induced mortality that would be sustainable ranges  
77 from 28-29% [15] to 5-10% lower estimates by [16-18]. A higher estimate by [19] has been  
78 questioned because of seeming errors in calculations [18], so their higher estimate needs  
79 replication or correction. We use this meaning of sustainability not the other meaning of  
80 sustain suggesting a wolf population can withstand one or two years of higher rates of mortality  
81 before extirpation. Our justification apart from the literature comes from the Wisconsin DNR  
82 itself, using the Adams et al. [15] estimate in prior wolf-hunting plans [20, 21], citation of those  
83 quota plans in 2021 [22], and explicit mention of using a 24% threshold on 15 February 2021  
84 [23] by D. MacFarland. Evaluating sustainability of natural resource uses demands long-term  
85 data, so here we only discuss the one-year outcome in light of the objectives. Nevertheless, we  
86 can evaluate the state objective scientifically because we have official hunt statistics official  
87 population estimates, and relevant, peer-reviewed scientific models. Namely, the wolves of  
88 Wisconsin were subject to two recent modeling efforts. First, models of population growth

89 were built that took into account loosening of ESA protections as seen on 3 November 2020  
90 [24-27]; note we use 3 November from the Federal Register for consistency with prior studies  
91 [24, 28]. Also, individual survival models used time-to-event analyses to estimate cryptic  
92 poaching in competing risk frameworks [28]. These allow us to estimate population change in a  
93 single year and increments in human-induced mortality following delisting and through the  
94 wolf-hunt period. The serendipitous combination of population estimates, hunter-killed totals,  
95 and models of the individual and population-level effects of reducing ESA protections make this  
96 case unique to our knowledge.

97

98 Another feature of the Wisconsin case that makes it relevant beyond that State are the  
99 subnational governance issues involved. The DNR was not alone in deciding or designing the  
100 state wolf hunt. A local court, the legislature, and the Natural Resource Board (NRB), which is a  
101 commission overseen by both the executive and the legislature all had a say in the February  
102 2021 wolf-hunt timing, methods, and quota (Supplementary Material 1). Therefore, the  
103 Wisconsin case study may provide readers from other regions with insights into the checks and  
104 balances across three independent branches of a democratic government.

105

106 Here we evaluate whether the state attained its objective "...to allow for a sustainable harvest  
107 that neither increases nor decreases the state's wolf population...", by modeling population  
108 change after the State of Wisconsin issued 2380 permits, intending to kill 119 wolves  
109 (<https://dnr.wisconsin.gov/newsroom/release/41071>, accessed 24 March 2021), but resulting  
110 in permitted kills of 218 wolves in <3 days [29].

111

## 112 **Materials and Methods**

113 We used official population estimates since April 2017 as the population grew from 925-1034  
114 minimum counts (SM1) to estimate the population in April 2021. We began with population  
115 estimates and dynamics since April 2017, which represents the most recent 4 years of wolf  
116 population growth after the last wolf-hunt in December 2015 [30]. Therefore, we assume  
117 similar population dynamics, such as density-dependence, as observed in 2017-2020. We also  
118 assume the effects of that prior wolf-hunt had worked themselves out of the population  
119 dynamics preceding the wolf-hunt of February 2021. Some readers may be interested in seeing  
120 a one-year population change model that allows for density-dependence or compensatory  
121 effects on mortality, reproduction, recruitment, or migration. In SM2, we explain why a  
122 population model without such non-linear effects is the more conservative model.

123

124 We used three conservative scenarios for estimating population change. Our precautionary  
125 approach is to begin with the minimum bound of the April 2020 estimate by the State in its wolf  
126 population census. Our approach is precautionary because loners and transients contribute  
127 little to population growth or the total size of the population and few if any packs have been  
128 missed in previous years. Also, the minimum count of 1034 wolves in 256 packs is consistent  
129 with long-term average pack sizes around 4 wolves [31].

130

131 The first scenario, which we label HIGH, uses the average growth estimated by the state during  
132 periods of strict ESA protection 2017-2020  $(N_{t+1}-N_t)/N_t = +3.8\%$ , and accounts for mortality

133 additional to background levels found during those years to account for the delisting period  
134 from 3 November 2020 to 14 April 2021. Specifically, we deduct additional deaths expected  
135 during periods without ESA protection from a recent peer-reviewed model of individual survival  
136 as policies changed.

137

138 Recent quantitative models predict that cryptic poaching — illegal killing in which perpetrators  
139 conceal evidence [32] — rises significantly for endangered wolves when wolf-killing or removal  
140 from the wild, mostly by government agents, is legally permitted [28, 33]. The latter two recent  
141 models used independent datasets to estimate mortality and disappearance of marked wolves  
142 from the date of collaring (mainly VHF radio transmitters) until death or disappearance, using  
143 individual-level, time-to-event analyses to compare periods of strict ESA protection to periods  
144 of reduced protection during which time wolf-killing or removal of wild wolves to captivity was  
145 liberalized [28, 33]. The rationale for assigning most disappearances of radio-collared wolves to  
146 cryptic poaching follows discussions in those papers and others [12, 34, 35], which we  
147 summarized in SM2 after describing compensatory mortality. The latter works improved upon  
148 earlier efforts [36, 37], as did [38], but those we use here also improved by explicitly accounting  
149 for radio-collared wolves that disappeared as a function of the length of time wolves were  
150 exposed to policy periods that reduced ESA protections [28]. Unregulated and often  
151 undocumented illegal killing (poaching) exceeded legal, reported wolf-killing in every  
152 population studied thus far [12, 15, 32, 34]. Therefore, it is essential to accurate monitoring and  
153 quota-setting that prudent managers consider these additional deaths and count all mortality,  
154 or at least all anthropogenic mortality, when planning and communicating public hunting  
155 seasons.

156

157 The second scenario, which we label MODERATE, uses the minimum growth estimated by the  
158 state in those years  $(N_{t+1}-N_t)/N_t = -2.2\%$ . Using the minimum population growth observed in the  
159 past 4 years is consistent with a precautionary approach and the findings for a population-level  
160 model of all wolves in Wisconsin and a model for Michigan from 1995-2012 [24, 25]. Those  
161 studies report that periods of liberalized wolf-killing were associated with an unidentified and  
162 unreported source of mortality that slowed population growth, independent of legal killing, by  
163 4-6% annually. These studies resisted quantitative and qualitative challenges without published  
164 support for alternative hypotheses of density-dependence on mortality [26, 27, 39-41].  
165 Furthermore, social scientific data corroborated the population-level findings with independent  
166 datasets [42, 43] and the authors' own findings [44, 45]. This scenario also deducted additional  
167 wolf deaths as in the HIGH scenario.

168

169 Finally, for the third, LOW, scenario we took the minimum population growth observed in years  
170 of full ESA protection (-2.2%) and subtract another 5%, for a final decrement of -7.2%. The LOW  
171 scenario, LOW adjusts the observed minimum growth downward by 5%  $(N_{t+1}-N_t)/N_t = -7.2\%$ , but  
172 does not add the additional mortality because that might double-count the effect of reduced  
173 protections after delisting on 3 November 2020.

174

175 Assumptions

176 Our estimates contain a set of assumptions, all of which we aimed to make conservatively, so  
177 our outputs are minimum estimates of deaths and maximum estimates of population size.

178

179 We report only the increment in deaths and disappearances after delisting, i.e., those that we  
180 estimate would have survived had delisting not proceeded. We use these as increments in  
181 mortality for the HIGH and MODERATE scenarios only. The lower estimate for additional deaths  
182 and disappearances comes from wolves in Wisconsin from 1980-2012 [28]. The higher estimate  
183 for Mexican gray wolves, in New Mexico and Arizona, is more certain because of more intensive  
184 monitoring of a greater proportion of the population [33]. Therefore, the Wisconsin estimates  
185 are conservative among available estimates of cryptic poaching increments.

186

187 As summarized in SM2, when we estimate additional wolf deaths and disappearances after  
188 delisting, we assume those wolves are lost to the Wisconsin population. Studies in at least four  
189 populations found that the vast majority of radio-collared wolf disappearances are earlier than  
190 would be expected from battery or mechanical failure [12, 28, 32-35]. We are aware of no  
191 evidence of a mechanism by which mechanical failure rates would increase in association with a  
192 liberalized killing period. Further, the Scandinavian studies that first described cryptic poaching  
193 used genetics to confirm the disappearance of known wolves, and later associated those rates  
194 to policies, concluded that missing wolves no longer moved on the landscape, as opposed to  
195 eluding monitoring [32, 46] but see our qualms about their inferences about policy effects [47].  
196 Indeed, migration into rather than out of regions that experienced high rates of legal and illegal  
197 wolf-killing seems more likely. In the Alaskan gray wolf study widely used to identify a  
198 sustainability threshold for wolf-killing [15], the authors reported >75% of human-caused  
199 mortality was caused by intentional, unregulated hunting, and that the off-take was  
200 unsustainable without large amounts of immigration.

201

202 Also, we assumed no super-additive mortality per capita of legal kills, as reported or inferred  
203 for exploited wolf populations [17, 18], because we assume our estimates of cryptic poaching  
204 model some super-additivity. This is conservative because failed pregnancies, litter loss, and  
205 unreported deaths of uncollared wolves that might accompany and follow the hunting and  
206 poaching would not have been captured in the individual models that used marked adult  
207 wolves only. Non-radio-collared wolves succumbed to all deaths at higher rates than radio-  
208 collared wolves in Alaska [48], and in Wisconsin [35]. Possibly some poachers are deterred by  
209 the threat of prosecution if they kill a collared animal [49]. In sum, estimates of incremental  
210 deaths and disappearances in the HIGH and MODERATE scenarios are likely to under-estimate  
211 deaths.

212

213 Next we assumed permitted wolf-killing will have similar effects on the wolf population and on  
214 would-be wolf-poachers as that estimated from 2003-2012, during which time government  
215 agents were primarily responsible for wolf-killing and no public hunts were held. This is  
216 conservative given the 2021 wolf-hunt killed more wolves than in past periods [24, 30], and did  
217 so with unprecedented methods (e.g., snowmobile chase, night-time, hounds, traps) in a very  
218 rapid timeframe. It would be plausible to assume rapid, efficient poaching also but we do not.

219

220 Also, we assume all growth occurs prior to delisting because pups recruited into the population  
221 in November are treated as adults for purposes of census [50]. Relatedly, we assume that  
222 wolves alive on 15 April 2020 began their exposure to hazards at that time, rather than  
223 considering their full time alive as adults, for which we have no data. This is conservative  
224 because (1) the cumulative incidence (rather than the instantaneous hazard) of mortality  
225 increases with monitoring time naturally, and (2) the difference between the cumulative  
226 incidence functions for each protection period (Fig 1) increases with monitoring time beyond  
227 our study period ( $t=365$ ) [28].

228

229 Finally, we did not use unpublished, preliminary, unverified estimates provided by the DNR in  
230 April 2021 that 17 out of 50 collared wolves disappeared prior to or during the 2021 wolf-hunt  
231 and another 7 were killed by hunters (SM 1 Fig 1). Had we uncritically used those figures for  
232 deaths and disappearances of the entire wolf population, our estimate of wolf survival would  
233 have been 48% and the associated wolf population decline would have been much greater. But  
234 those data are unverified currently and as noted above collared wolves suffer different  
235 mortality hazard than uncollared ones in Wisconsin and elsewhere.

236

237 The formula we use for all three scenarios is

238

$$239 \text{ Eq. 1 } N_{2021} = (N_{2020} \cdot r) - 218 - E$$

240

241 where  $N_{2020} = 1034$ ,  $r$  varies by scenario as +0.038 (HIGH), -0.022 (MODERATE), or -.072 (LOW)  
242 respectively, and 'E' refers to additional wolves dead due to reduced ESA protections,  
243 calculated using the cumulative incidence functions (CIFs, Fig 1A,B) for all endpoints during a  
244 period of liberalized wolf-killing from [28] but set to zero for the LOW scenario. CIFs by policy  
245 periods for all endpoints and LTF (Fig 1A,B) were calculated using semi-parametric Fine-Gray  
246 models, with data from 513 monitored, adult wolves (1979-2012) [28].

247

248 We also estimate the proportion of all additional mortalities due to cryptic poaching, using the  
249 difference in CIFs for radio-collared wolves lost to follow-up. In the two types of policy periods  
250 (Fig 1B), divided by the same difference in the CIFs of all endpoints (Fig 1A) at day 365 (15 Apr  
251 2021).

252

253 We do not attempt to model population change from 15 April 2021-November 2021 when the  
254 next wolf-hunt is putatively planned because there are too many uncertainties about  
255 reproduction, legality, and planning processes. A lack of transparency about state wolf data  
256 from 2013-2015 prevents independent scientific scrutiny of past regulated hunting [28, 51].

257

## 258 Results

259 We predict the state population by 15 April 2021 will stand at a maximum possible number of  
260 wolves of 695-751 wolves (scenarios: LOW 742, MODERATE 695, HIGH 751) (Tables 1, 2). This  
261 represents a minimum of a 27-33% decrease in one year. We emphasize that is a minimum and  
262 the population size is a maximum because of the many conservative methods we used.

263 Table 1 here

264 Table 2 here

265 We estimate that in addition to the 218 wolves reported killed during the wolf-hunt, 98-105  
266 wolves died since 3 November 2020 that would have been alive had delisting not occurred. Of  
267 these 56-63% (55-58 wolves) at a minimum would have been killed through cryptic poaching.  
268 Therefore, the addition of cryptic poaching and wolf-hunting in Wisconsin after 3 November  
269 2020 seems to have augmented human-caused mortality by approximately 30% (320 of 1034-  
270 1071) over pre-delisting levels.

271 Figure 1 here

272

## 273 Discussion

274 We report the expected additional wolf mortality and population reduction in the aftermath of  
275 U.S. federal removal of endangered species protections followed by one state's swift adoption  
276 of a policy for liberalized wolf-killing, including permitted, public hunting, trapping, hounding,  
277 and snow-mobile pursuit by day and night. We estimate the incremental addition of at least 98-  
278 105 wolf deaths prompted by removing protections, of which cryptic poaching would comprise  
279 the majority, in addition to the hunting deaths.

280

281 We estimate a population reduction of at least 27-33% in one year, which contradicts the  
282 expectation by the state wildlife agency that there would be no reduction in the wolf  
283 population. Moreover, our estimates are strict minima for actual reductions in the population,  
284 so our population estimate is a maximum conceivable under the most conservative  
285 assumptions. The reality is probably a greater reduction and a lower population count as of  
286 writing.

287

288 If the second planned wolf-hunt in November 2021 (SM 1) were cancelled, we predict the state  
289 wolf population could rebound in 1-2 years. However, there are preliminary indications from  
290 the state Natural Resource Board that another wolf-hunt with a similar or higher quota will be  
291 advocated by some on the board (SM 1). Proponents for such point to the 1999 population goal  
292 for wolves of 350 individuals in late winter. We have shown that number is a value judgment by  
293 a few individuals not a scientifically sound target [51]. Therefore, the adequacy of state  
294 regulatory mechanisms seems fragile, for reasons detailed in SM1 for those interested in policy  
295 background. The frailty of regulatory mechanisms can be summarized as follows:

- 296 1. The intervention of numerous branches of the state government (SM1)
- 297 2. A Wisconsin statute which mandates a hunt in the event of federal delisting,  
298 rather than granting discretion to the DNR (SM1)
- 299 3. Various disparate estimates of the population size, the hunter take, poaching, and  
300 resilience that have been espoused by officials and the public (SM1)

301 In sum, the state wildlife agency (DNR) did not meet its explicit objectives of no change in the  
302 wolf population, still being advocated by that agency as of writing

303 (<https://dnr.wisconsin.gov/topic/hunt/wolf/index.html> accessed 16 April 2021). The facts of

304 hunters over-shooting the quota by 83% before the DNR could close zones, of the Natural  
305 Resource Board over-ruling the DNR's more cautious permit number, the legislature mandating  
306 a hunt, a county court ordering a hunt on very short notice, and an appeals court declining to  
307 review that decision (SM1) all speak to problems with different branches intervening to reduce  
308 the discretion of the wildlife agency. That loss of discretion by the ostensible expert managers  
309 itself raises serious questions about the adequacy of regulatory mechanisms to prevent wolves  
310 becoming endangered again. It also leads us to recommend reform of trustee duties in the  
311 state and perhaps others with unclear responsibilities and unclear divisions between decision-  
312 making and implementation functions.

313

### 314 **Conclusions**

315 For jurisdictions elsewhere, we caution that science may play little role in wolf politics where  
316 the animal has become a symbol for political rhetoric and a symbol of cultural divisions [52].  
317 However, science only reveals past, present or future conditions, not what we humans ought to  
318 do.

319

320 Proponents of wolf-killing argued that the state population goal of 350 wolves demands such  
321 swift reductions (SM 1), but evidence suggests that goal is a value judgment by a few  
322 individuals that was treated as if it were an output of a scientific model [53]. Moreover, that  
323 the model used suffers from scientific flaws, so its assumptions and predictions are dubious  
324 [53]. Nevertheless, the goal was reaffirmed in February 2021 (SM 1). Furthermore, the state did  
325 not collect wolf carcasses for aging or detection of alpha females by placental scars, as is fairly  
326 standard for scientific studies, e.g., [54]—see SM1. This type of scientific information is  
327 indispensable for science-based management. Without it, illegal wolf-killing is more difficult to  
328 detect, the age and reproductive class of hunter-killed wolves is likely imprecise, and the  
329 breeding status and hence reproductive performance for the following year cannot be  
330 estimated accurately.

331

332 Likewise, state plans for another hunt raise questions about sustainability. Although one  
333 subnational jurisdiction may not predict another, doubts about sustainable wolf-killing and  
334 misuse of scientific information have been raised previously for several other governments (see  
335 [55] and [56], respectively). Therefore, we find our case is not unique, and provides insights for  
336 other jurisdictions. Similar wolf-killing might be replicated elsewhere when subnational  
337 jurisdictions in the USA and EU regain authority for controversial predators. Federal  
338 governments in both regions should recognize that loosening protections for predators, and  
339 perhaps other controversial species, opens the door for antagonists [4, 57] to kill large numbers  
340 in short periods, legally and illegally. The history of political scapegoating of wolves [56, 58] may  
341 repeat itself. Elsewhere, we have shown that the response should not be to allow more wolf-  
342 killing under the misguided concept of blood buys goodwill or 'tolerance killing' [27, 28, 33, 45].

343

344 Federal decision-makers might consider different classifications that make predators protected  
345 non-game, or states should prove themselves capable of reducing poaching to a stringent  
346 minimum for a 5-year post-delisting monitoring period. Alternately, federal governments might  
347 address upgrades to federal laws regardless of species classifications. Given the importance of

348 predators in restoring ecosystem health and function [59] and non-anthropocentric wildlife  
349 trusteeship [33, 60], we also recommend instead that transparent legal standards of  
350 trusteeship be used to manage wildlife [61, 62], not the vagaries of opaque electoral politics  
351 and interest group lobbying [51]. Moreover, our recommendation conforms to global goals for  
352 the preservation of nature.

353

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**Table 1** (on next page)

Table 1

Population and extra mortality estimation in scenario MODERATE that assumes annual change -2.2% by Apr 2021

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2 **Table 1.** Population and extra mortality estimation in scenario HIGH that assumes annual  
 3 growth +3.8% by Apr 2021

TIMELINE OF WOLF POPULATION CHANGES	N	INDIVIDUALS DEAD AND DISAPPEARED	
		Additional, due to reduced ESA protections*	Notes
15 April 2020 in 256 packs, Day 0	1034		We assume wolves begin monitoring on this date
Expected by 2 Nov 2020, Day 201 - <i>REDUCED PROTECTION PERIOD BEGINS ON 3 NOV 2020</i>	1073	97	Nov 3-Feb 21 (Days 202-312, 111 day interval): Liberalized wolf-killing period cumulative incidence as a relative increment of +0.09 for all endpoints relative to baseline of strict ESA protection
Expected by 24 Feb 2021, Day 315 - <i>END OF WOLF-HUNT</i>	759	218	Legal kills during wolf-hunt Feb 22-24 (3 days)
Expected by 15 Apr 2021, Day 365	751	8	Feb 22-Apr 14 (Days 313-365, 51 day interval): Liberalized wolf-killing period cumulative incidence as a relative increment of +0.01 for all endpoints relative to baseline of strict ESA protection

4 \* Source for all cumulative incidences is [15].

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**Table 2** (on next page)

Table 2

Population and extra mortality estimation in scenario HIGH that assumes annual growth +3.8% by Apr 2021

1

2 **Table 2.** Population and extra mortality estimation in scenario MODERATE that assumes annual  
 3 change -2.2% by Apr 2021

TIMELINE OF WOLF POPULATION CHANGES	N	INDIVIDUALS DEAD AND DISAPPEARED	
		Additional, due to reduced ESA protections*	Notes
15 April 2020 in 256 packs, Day 0	1034		We assume wolves begin monitoring on this date
Expected by 2 Nov 2020, Day 201 - <i>REDUCED PROTECTION PERIOD BEGINS ON 3 NOV 2020</i>	1011	91	Nov 3-Feb 21 (Days 202-312, 111 day interval): Liberalized wolf-killing period cumulative incidence as a relative increment of +0.09 for all endpoints relative to baseline of strict ESA protection
Expected by 24 Feb 2021, Day 315 - <i>END OF WOLF-HUNT</i>	702	218	Legal kills during wolf-hunt Feb 22-24 (3 days)
Expected by 15 Apr 2021, Day 365	695	7	Feb 22-Apr 14 (Days 313-365, 51 day interval): Liberalized wolf-killing period cumulative incidence as a relative increment of +0.01 for all endpoints relative to baseline of strict ESA protection

4 \* Source for all cumulative incidences is [15].

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# Figure 1

fig 1

**Cumulative Incidence of endpoints by protection period.** Cumulative incidence functions (CIFs) for 499 monitored, adult wolves in Wisconsin during two policy periods (gray: reduced ESA protections; black: full ESA protections) for all deaths and disappearances (Panel A: n=499), and disappearances only (Panel B: n=243) from 1979-2012. Coordinates (x,y) represent the cumulative incidence or proportion of monitored wolves experiencing an endpoint (y-axis); showing all deaths in (A) or all disappearances in (B), over time (x-axis) in days. Time zero is set to 16 April 2020, a conservative step because death or disappearance increases with time, by definition. CIFs modeled with semi-parametric Fine-Gray models [27]. The first period of 201 days runs from 15 April 2020 to 3 November 2020 when delisting was announced in the Federal Register [9] and the period of reduced ESA protection began. Day 312 marks the start of the Wisconsin wolf-hunt on 22 Feb 2021, and day 365 marks the end of the wolf-year on 14 April 2021. Finally, day 566 marks the approximate start date of the putative, next wolf-hunt, to illustrate further increases in the CIFs of mortalities and disappearances. We used the increment between the period of full ESA protection (black markers) to the corresponding value on the upper curve of reduced ESA protection (gray markers) to estimate the additional wolves deducted from the population by any endpoint (A) or LTF; (B) which we interpret as cryptic poaching as explained in Main text.

