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Questionable policy for large carnivore hunting

Scott Creel^{1,2,*}, Matthew Becker², David Christianson³, Egil Drøge¹, Neil Hammerschlag⁴, Matt W. Hayward⁵, Ullas Karanth⁶, Andrew Loveridge⁷, David W. Macdonald⁷, Wigganson Matandiko¹, Jassiel M'soka^{1,8}, Dennis Murray⁹, Elias Rosenblatt¹, Paul Schuette¹⁰

+ Author Affiliations

↩* Corresponding author. E-mail: screel@montana.edu

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RE: Questionable policy for large carnivore hunting

[Scott Creel](#),

Montana State University

Other Contributors:

Matt Becker,

Zambia Carnivore Programme

David Christianson, University of Arizona

Egil Droge, Montana State University

Neil Hammerschlag, University of Miami

Matthew Hayward, Bangor University



David Macdonald, Oxford University, WildCRU
Wigganson Matandiko, Montana State University
Jassiel M'soka, Zambia Department of National Parks and Wildlife
Dennis Murray, Trent University
Elias Rosenblatt, University of Vermont
Paul Schuette, University of Alaska, Anchorage

(9 June 2016)

Attached as pdf file is a detailed rebuttal of comments by Mitchell et al (including a brief comment also on comments by Treves et al.)

Competing Interests: None declared.

Attachments

 [Creel_et_al.pdf](#)

Management of wolves in the US Northern Rocky Mountains is Based on Sound Science and Policy

[Michael S. Mitchell](#), Unit Leader,

US Geological Survey, Montana Cooperative Wildlife Research Unit

Other Contributors:

Justin A. Gude, Chief, Research and Technical Services Section,
Montana Fish, Wildlife and Parks

Kevin Podruzny, Statistician, Montana Fish, Wildlife and Parks

Edward E. Bangs, Western Gray Wolf Recovery Coordinator (retired), US Fish
and Wildlife Service

Jim Hayden, Staff Biologist, Idaho Department of Fish and Game

Robert M. Inman, Carnivore-Furbearer Coordinator, Montana Fish, Wildlife
and Parks

Michael D. Jimenez, Wyoming Gray Wolf Project Leader, US Fish and Wildlife
Service



Daniel H. Pletscher, Professor, Wildlife Biology Program (retired), University of Montana

Jon Rachael, State Wildlife Game Manager, Idaho Department of Fish and Game

Robert Ream, Chair (former), Montana Fish, Wildlife and Parks Commission

John Vore, Chief, Game Management Bureau, Montana Fish, Wildlife and Parks

(7 June 2016)

Creel et al. (2015; 1) recently asserted that hunting policies for wolves in the western US do not align with ecological theory or data and that 4 aspects of policy should be amended. Their arguments are based on erroneous use of monitoring data and a lack of familiarity with policies for managing wolves in the US northern Rocky Mountains (NRM).

The conclusions drawn by Creel et al. (2015) on the effects of hunting on wolf demography in the NRM are based on monitoring data from US Fish and Wildlife Service (USFWS) reports (2) never intended for analyses such as theirs; the authors nonetheless used the data naively without acknowledging their limitations, and disregarded more detailed presentations of the data (3, 4). Contrary to their own admonition about the questionable reliability of population counts that change in parallel with sampling effort, Creel et al. (2015) used monitoring data (2) for minimum counts and pack sizes (e.g., Northwestern Montana in 2004 and 2004, Idaho in 2010) that were biased low because of strongly reduced sampling effort (3, 4). Gude et al. (2012; 5) showed that the inferential effect of using these biased data is substantial, explaining the difference between the ~25% threshold for sustainable mortality reported by Creel et al. (2015; see also 6) and the 48% threshold estimated without them. A similar problem also undermines the conclusion that the Idaho population declined 22.4% from 2008 to 2013 because the greatest decline in I...



Attachments

 MToccupancymap2012.jpg

 MTabundanceestimates.jpg

Missing wolves, misguided policy

Adrian Treves, Scientist,

Nelson Institute for Environmental Studies, 30A Science Hall, 550 North Park Street, University of Wisconsin, Madison, WI 53706

Other Contributors:

Miha Krofel, Scientist,

Biotechnical Faculty, Dept. of Forestry, University of Ljubljana, Večna pot 83, SI-1001 Ljubljana, Slovenia, miha

Jose Vicente Lopez-Bao, Scientist, Grimsö Wildlife Research Station, Swedish University of Agricultural Sciences Research Unit of Biodiversity, Oviedo University

(5 June 2016)

Creel et al. (18 December, p. 1473) analyzed state and federal government reports on wolf mortality from data collected in the Northern Rocky Mountains (NRM). We found critical omissions in those reports (<https://www.fws.gov/mountain-prairie/es/grayWolf.php>), which invalidate government mortality and survival analyses and raise doubts about the legitimacy of government determinations.

Chief among the omissions, the reports did not include the total time that radio-collared wolves were transmitting or sufficient information on missing wolves, both of which are essential for mortality analyses. Missing wolves averaged 21.1% of the 711 marked wolves across NRM 1982–2004 (1). Battery failure and emigration were very unlikely explanations (1); see the Appendix below. The most parsimonious explanation is that most missing wolves died and their radios stopped transmitting. If we assume missing wolves died of



2004 (Appendix). Poaching is the most likely cause of death because humans cause the majority of wolf deaths that go unreported to governments (2-5) and humans have also strong incentives to hide poaching events (e.g., destroy radio-transmitters), whereas other causes of death do so vanishingly rarely. Therefore, the anthropogenic kill rate presented in Creel et al. and reported by state and federal governments were minimum estimates. Moreover, those minimum estimates were systematically biased towards under-estimating actual human-caused mortality. Furthermore the credible bounds on actual human-caused mortality are asymmetrical (higher values are far more likely than lower value when one estimates minima) so standard regression techniques maybe inappropriate. As a consequence, the damage done of hunting policies to NRM wolf population health may be higher than Creel et al. depicted. Determining whether wolf-hunting policies jeopardize NRM wolves will require more transparency in wolf data published by state and federal governments.

Even without Endangered Species Act mandates for use of best available science, both state and federal governments have trustee obligations (6). The fundamental obligation of the U.S. public trust doctrine is that a good trustee is prudent about allocation of assets to current generations (e.g., hunting quotas) and account for them transparently in a sophisticated manner (7). In our context that means the prudent trustee will take into account all losses of the trust assets, which in this case includes all of the NRM wolves that died of any cause. Therefore, poaching should be estimated more carefully using more sophisticated methods (2, 4, 5) and the results integrated more wisely into wolf policies. For example, many scientists are considering how to account properly for carnivore mortality and 'count' poaching against legal killing, as an incentive for hunters and trappers to self-police. A prudent trustee should also preserve assets for future generations (8). The legitimate response of a trustee would be to revert to transparency and prudence so as to restore the public trust.



expected battery life and within 27 days of median time to known deaths. Also, they wrote, “Overall, during our study wolves died from legal control (30.0%...), illegal mortality (24.0%), natural causes (11.8%), other causes (e.g., vehicle accidents, strife; 21.4%), and unknown causes (11.8%) ... [n=363 deaths].” (p.625). If one accepts that most missing wolves died near the time of disappearance, then a conservative assumption is to allocate the 21.1% of missing wolves and the 11.8% of unknown causes of death to causes of death that were not perfectly reported, i.e., excluding legal lethal control (2). When we assign those unknown deaths proportionally to the remaining causes, illegal take represents 31.3% of deaths, which makes it the major cause of death for NRM wolves in that period. Poaching is unlikely to have declined 2005–2015 after lethal control increased and hunting was added (9). Note this logic applies even if some radio-collars failed or wolves migrated because those wolves eventually died also.

Furthermore, Smith et al. (2010) noted that missing wolves were last detected in areas where the chance of arrest for poaching was low (few people), conflict risk was high (livestock areas), and visibility was good (more open habitat). We find no evidence that conditions changed 2004–2009 and thereafter the implementation of regulated hunting and trapping complicates the calculations but the logic persists.

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Authors: Adrian Treves 1*, Miha Krofel 2, Jose V. Lopez-Bao 3

Affiliations:

1Nelson Institute for Environmental Studies, 30A Science Hall, 550 North Park Street, University of Wisconsin, Madison, WI 53706, USA, atreves@wisc.edu.

2Biotechnical Faculty, Dept. of Forestry, University of Ljubljana, Večna pot 83, SI-1001 Ljubljana, Slovenia, miha.krofel@gmail.com.

3Grimsö Wildlife Research Station, Swedish University of Agricultural Sciences, SE - 73091 Riddarhyttan and Research Unit of Biodiversity, Oviedo University, 33600 Mieres, Spain, jv.lopezbao@gmail.com.

*Corresponding author: atreves@wisc.edu.

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