

*** This file was updated to include the entirety of PC134, which was inadvertently published incompletely. All Board of Game members received a complete copy of PC134 before the meeting.***



PC1

Name: Multiple Submitters, Listed after comment text

Community of Residence: Multiple

Comment:

To: Alaska Department of Fish & Game Commissioner Douglas Vincent-Lang

I am writing to urge you to reject the latest plan from the Alaska Department of Fish & Game which would authorize aerial gunning down of wolves, brown bears, and black bears across a 40,000 square mile area!! This area is bordered by the purposeful YUKON DELTA NATIONAL WILDLIFE REFUGE, TOGIAK NATIONAL WILDLIFE REFUGE, KATMAI NATIONAL PARK AND LAKE CLARK NATIONAL PRESERVE!!

This operation is inhumane and unethical, causing unnecessary suffering to the bears... AND represents a troubling approach to wildlife management. In addition, AS YOU ARE WELL AWARE, it lacks a scientific foundation as study after study shows that predators are not the major factor determining the population of moose, caribou, and other game animals. ADFG is sidestepping the fact that such action will disrupt ecosystems for the obvious purpose of sport killing vs scientific foundations.

The practice is not only seen as unethical and inhumane but seen as damaging Alaska's reputation as a responsible steward of its natural resources and will most certainly if enacted, filter down to boycotting Alaska's economy because of this obvious uneducated attack on apex predators.

In addition, you would also know in your position, that the killing of older, experienced bears can lead to the loss of vital survival knowledge for younger bears. If you proceed with this egregious act, it is a stamp of approval that your commission does not care about the viability of the targeted species.

A similar Alaskan predator control operation in 2023 killed approximately 100 brown bears (including cubs) and black bears, far more than the original planners estimated. This suggests that the Department cannot control the true mortality levels during these exercises.

I strongly urge you to reconsider this senseless plan and prioritize a more balanced, humane approach to wildlife management which we the people expect of those placed in vital positions such as yours.

Concerned Citizen,

Abad, Maria	Nevada
Alix, Lisa	VT
Babin, C	Seward
Becker, Ryan	Na
Bedrich , Julie	Knox County, TN
Braddock , Kathy	Residence
Bradford , Norma	Anchorage Ak & Spring Hill Fl
Brimm, Tiffany	Whitmore
Buckley , Melissa	Indiana
Carneiro Saraiva, Miriam	Sun City Center
Cox, Tara	USA
Cox, Tyson	USA
Fish, Justin	MO
Gero, Hava	Israel

Giesbrecht, Nancy	Canada
Gilsky, Cathy	Bridgeton, NJ
Grace, Diane	Florida
Green, Lesley	England
Gust, Valerie	Idaho
Guyer, Matthew	Pennsylvania
Hannah, Susan	Missouri
Harrison , Robert	Richmond KY
Hein, Claudia	Concord, CA
Hoak, Kristen	New Providence
Howard, Vanessa	USA
Koenemann , Teresa	Elkhart
Kruczek, Sandra	Wisconsin
Llewellyn, Bronwen	OK
Mahaffey, Carolyn	Texas
Marmo , Patrick	Idaho Falls Idaho
McMurray, Michele	Colorado
Mercer, Dani	Spokane, WA
Mora, Maria	Texas
Morris, Monica	Ohio
Nelson , Teri	Colchester
Nill , P	USA
Orcutt, Stacey	Idaho
Ortega, Paula	Rock Springs
Owens, Roger	Illinois
Palmer, Kimberli	Colorado
Pershin, Melissa	USA
Potter, Kathleen	North Carolina
Reeves, Kristi	CO
Rheinhardt, Patricia	North Aurora, IL
Starkweather , Val	Watkins Glen NY
Starkweather , Val	Watkins Glen NY
Touchton, Linda	Florida
Touchton, Linda	Florida
Townsend, Jann	Idaho and New Mexico
Van Holland, Catherine	Orange
Van Holland, Catherine	Orange
Waldoch, Alicia	Fargo, ND
Warner , Sharon	Washington, USA
Wenger , Debbie	Sabetha, KS
Weyler , Michelle	United States



PC2

Name: A, Kailani

Community of Residence: Hawaii, HI

Comment:

quit killing the animals as the land is their home before ours. In all disrespect to the people who are pushing this to happen, you are absolutely disgusting. The land is their home and we took it. We should be ashamed of ourselves.



PC3

Name: Abbas, Yasmine

Community of Residence: Dallas, TX

Comment:

I believe that animals should stay as they are intended. The predator control is not effective, and killing animals is pointless in this scenario.



PC4

Name: Abou Jaoude, Tamara

Community of Residence: Citizen of the world

Comment:

We need to protect all animals , we should stop playing GOD! So please leave bears alone !



PC5

Name: Aburto, Paulina

Community of Residence: El Paso

Comment:

Bears are beautiful north american wildlife, to harm them is to harm our home. Predators are important and keep the balance on the food chain, killing these creatures will only create more problems. Please do not harm them.



PC6

Name: Acevedo, Elizabeth

Community of Residence: U.S. (Louisiana)

Comment:

I oppose the proposal that permits the killing of bears as a supposed means of addressing caribou population concerns. There is no credible scientific evidence that supports that this method will help the caribou. What the proposal authorizes - the senseless killing of brown bears, even mothers and cubs, including helicopter shooting -- is unethical and simply cruel. Brown bears have little wild space left in this world and they should not suffer such a terrible fate in their Alaska home.

If that isn't enough to shut down this proposal, I urge you to consider the wildlife viewing tourism dollars that are spent in Alaska to see wild brown bears roaming free in their natural habitat. I have visited Alaska specifically for that reason and am forever changed by witnessing it. I happily spent my money on the small Alaska lodge and guides, the small plane service that got us to the wilderness and the hotel, local restaurants and other amenities in Anchorage coming in and out of the area. Some of my travel mates had made that trip over 15 years. I hope to match them someday. And all of that spending has been because of Alaska's wild brown bears.

They deserve your protection and respect simply because they share the planet with us. But also they support your State's residents in so many ways. Please say no to this ill-conceived proposal to allow the killing of brown bears.



PC7

Name: Acevedo, Lauren

Community of Residence: Alameda

Comment:

I do not support the implementation of predator control of black or brown bears nor wolves. There is no scientific proof that killing these animals will help to protect the caribou. They are all part of the ecosystem and there is a reason the predator control program was previously deemed illegal. Reflection on those reasons should be a big talking point of this conversation and realizing that human intervention in wildlife affairs has rarely ended in a positive way for the wildlife.



PC8

Name: Acosta , Cristina

Community of Residence: Southern California

Comment:

Dear Alaska, I beg you to not kill these bears. The world would love to watch them on a bear cam and get inspired to visit Alaska. Please do not contribute to our vanishing wilderness with destruction of wildlife.

Sincerely, Cristina Acosta



PC9

Name: Acosta, Donna

Community of Residence: Canada

Comment:

These bears have every right to go about life. We, humans need to respect the animals that we must live amongst. Please let the bears live. I m not opposed to hunting for food, but this is absurd. The bears have a right to life.



PC10

Name: Acott , Susan

Community of Residence: Anchorage

Comment:

How can the ADFG is propose to reinstate a taxpayer-funded aerial gunning program targeting bears- including mothers with cubs.

This is absolutely disgusting and this should not be allowed or legislated and especially not as tax payer funded.



PC11

Name: Adair , Jennifer

Community of Residence: USA

Comment:

I do NOT support this! It is NOT back by science!



PC12

Name: Adamas, Porsche

Community of Residence: Hawaii

Comment:

Oppose, cruel and haphazard without evidence of benefitting the community



PC13

Name: Adamo, Patricia

Community of Residence: Staten Island, NY

Comment:

Brown bears on other parts of Alaska have home ranges from 50 to 195 square miles - studies show - & collaring projects in Lake Clark from 2014-2018 show bears moving into the proposed control area from the safe havens of the National Preserve. This widespread movement of Alaska's brown bears could very well mean the at the same brown bears the works watches fishing at Brooks Falls- just 50 miles from the border of the bear control area, could also be shot from helicopters if this gets passed? And why???

Please do not do this to this population of bear that Americans support and who's favorite pastime is watching them in their natural environment practicing natural behaviors (fishing, playing, etc). Tourism dollars depend on this.

I strongly oppose the proposed regulation to modify the Mulchatna Caribou Herd Mgmt area to allow for the take of brown and black bears by department staff to benefit the herd.

At this time credible scientific evidence on record does not presently exist support your conclusion that these bears can be killed sustainably.

In addition - that is overwhelming evidence that predator control programs that kills individuals DO NOT WORK to recover struggling moose & caribou populations. In fact the main reason for the Mulchatna caribou herd decline - according to the state's own research - is disease AND a lack of food - due to climate change and NOT predation due to these bears.

I totally support that these caribou succeed however I do not believe that the current, u lowly bear control program is the best way to help them.

I implore the Board of Game to make significant changes to this area and to do this it is CRITICAL to ensure that the decisions made are rooted in credible science and what the public WANTS - which are bear on their landscape - so that families can come and enjoy watching them feed, etc. This after all is what America is all about - our public lands - that we pay tax dollars for - to be able to honor and enjoy. We want bear there as well as Caribou.

Thank you for your time.



PC14

Name: Adams, Joan Adams

Community of Residence: US

Comment:

Leave the bears ALONE



PC15

Name: Adams, Kristin

Community of Residence: Wisconsin

Comment:

Save the Bears



PC16

Name: Adams, Sarah

Community of Residence: San Antonio, texas

Comment:

What an insane solution to a simple problem. Remove the tourists from the bear's habitat. Why is it the government's response to kill off the bears at the tax payers expense? If it's not clear, i object to this solution. Do better. Try again.



PC17

Name: Adamson, Sharon

Community of Residence: Northern Ireland

Comment:

Iam old enough to see the results of trying to manage nature and eco systems. If predator hierarchy is left alone it always balances out. Untouched nature is so rare and precious and needs to be kept for future generations. Kill the older adults and valuable behaviour is sometimes lost to younger members of that particular society.



PC18

Name: Aguilera, Saharai

Community of Residence: USA (Colorado)

Comment:

I find the murder of these bears to be unethical, nonsensical, driven by corrupt ideology and malice. The people doing that must have a serious mental problem. We need to care for our fauna as much as our flora. We are a beautiful country, let's keep it beautiful for generations to come.



PC19

Name: Ahuja, Anirudh

Community of Residence: India

Comment:

Imagine if for any god damn reason, us and our kids were ridiculously killed by some idiots and inhumane species. Stop this or you will not be able to avoid facing the horrors of it coming back to you and your family. We need less humans for sure but not animals.



PC20

Name: Aiello, Christopher

Community of Residence: Australia

Comment:

I am against the killing of brown bears and black bears for the purpose of caribou management.



PC21

Name: Akers, Taylah

Community of Residence: Alaska

Comment:

Save the bears !!!!!



PC22

Name: Akritidou , Fotini

Community of Residence: Thessaloniki, greece

Comment:

I love nature and all creatures in this planet have equal rights to life



PC23

Name: Aldaco, Marta

Community of Residence: Calle Paseo Solares #300 Casa 39

Comment:

Every single living creature have the righth to be RESPECT, free and care. 🐻 🦊 🐰



PC24

Name: Aldridge , Zym

Community of Residence: Silverspring maryland

Comment:

Do not kill the bears it doesn't work if you want to help the caribou try something that doesn't kill wildlife



PC25

Name: Aledo, Nikki

Community of Residence: Skagway Alaska

Comment:

Absolutely against this. These bears are in their home just trying to survive like us. You are not helping anyone by murdering these innocent blessings.



PC26

Name: Alfailakawi , Abdulrahman

Community of Residence: Hillsboro oregon

Comment:

Do not allow hunting from helicopters



PC27

Name: Allebach, Jennifer

Community of Residence: Mullica Twp,NJ

Comment:

People today have far too much knowledge and technology to handle population control of bears in such a barbaric and haphazard way .



PC28

Name: Allen, Isabella

Community of Residence: La county

Comment:

This is disgraceful. This isn't our home. It's the bears home. Teach humans how to respect them.



PC29

Name: Allen, Kelley

Community of Residence: Gulfport, FL

Comment:

PLEASE SAVE THE BEARS!!! STOP KILLING THEM!!! UNNECESSARY SLAUGHTER!!!
ALASKA HAS BEAUTIFUL WILDLIFE!!! STOP KILLING THE BEARS!!!(



PC30

Name: Allespach, Dr Heidi

Community of Residence: FL

Comment:

I am 100% in opposition to this. We humans need to stop deciding what animals to cull and which not to cull

I'm a native Floridian and was here when alligators and black bears were almost hunted to extinction. They made a comeback and now they're heading back towards Extinction again because of hunting. We need to leave nature alone and stop interfering.



PC31

Name: Altman, Arla

Community of Residence: Florida

Comment:

Please do not reinstate the hunt for bears. They are struggling to survive in a changing environment and their numbers are diminishing.



PC32

Name: Altman, Jennifer

Community of Residence: Arizona

Comment:

Protect the wildlife, don't kill the bears!



PC33

Name: Alvarado, Katherine

Community of Residence: Michigan

Comment:

I oppose this bill.

I do not agree with the way herd management is being done.

I read you tried to do the same with wolves and that did not help grow the Caribu herd and now you want to try by killing bears.

I do not agree with finding any bear from helicopters and shooting the ones you find.

You should be able to sell extra licenses for hunting with mother bear and babies being protected.

I did not see in the proposal how many deaths of Caribu are from bears.

You would be shooting bears and hoping they lose a good source of food which would decrease bear population even further. (If that actually kill that much Caribu)

It shows you have only closed Caribu hunting in certain areas when it should be closed in all areas.

Instead of closing all Caribu hunting in all areas you would rather have animals shot from helicopters.



PC34

Name: Amagai, Ken

Community of Residence: Japan

Comment:

Humans should not control other animals. There must be publicly accepted scientific evidence that killing bears is beneficial.



PC35

Name: Ambrogi , Jordan

Community of Residence: Pa

Comment:

I think its disgusting to kill innocent animals



PC36

Name: Amin , Prishita

Community of Residence: India

Comment:

THIS NEEDS TO STOP. THIS IS CRUELTY.



PC37

Name: Amsden, Trys

Community of Residence: British Columbia

Comment:

Bears are an extremely important part of our natural ecosystem and food chain.

We are in their land visiting, and unfortunately have forgotten that. They have a right to live and be free just as we do. and for Humans to take that away from them should damn be illegal. just like it is illegal to take a human life as well.

Humans are the problem on this planet, not our animals



PC38

Name: Anand, Supriya

Community of Residence: Vancouver

Comment:

I want to save the beautiful bears that reside in Katmai. Predator control has never worked. Come up with a solution that works best for everyone.



PC39

Name: Anderson, Olivia

Community of Residence: Colorado

Comment:

The Alaska Board of Game is considering a proposal to expand predator control in the Mulchatna Caribou Herd region by authorizing the removal of brown and black bears. While the goal of restoring caribou numbers is important, I oppose this expansion. Scientific research does not support the effectiveness of bear removal in increasing caribou populations. Instead, this action could create long-term ecological harm without achieving its intended results. Effective wildlife management must be grounded in evidence-based strategies that protect both species and ecosystems.

There is no conclusive scientific evidence that removing brown and black bears will significantly benefit the Mulchatna Caribou Herd. Studies have shown that caribou declines are often linked more strongly to factors such as disease, poor nutrition, and harsh weather conditions, not solely predator numbers. While predators do take calves, studies from Alaska and Canada have shown that even aggressive predator removal often fails to produce meaningful increases in adult caribou populations unless paired with other interventions. Removing bears without a comprehensive plan risks repeating failed efforts and wasting resources.

Eliminating bears may also disrupt the balance of the ecosystem. Brown and black bears are apex predators with important ecological roles. They distribute nutrients, regulate prey populations, and help maintain habitat health. When large predators are removed, the resulting imbalance creates a trophic cascade that can lead to habitat degradation and much more.

I urge the Board to prioritize science-based, holistic solutions that protect both the caribou and the broader ecosystem they depend on. Thank you for your time and commitment to Alaska's natural heritage.



PC40

Name: Andrade, Cherie

Community of Residence: California

Comment:

Leave the bears alone!!!



PC41

Name: Anesko, Laura

Community of Residence: Rancho Mirage, CA

Comment:

I feel it is our duty to protect wildlife and understand that we can learn to live cohesively with nature. They have a right to be here just as much as we do.



PC42

Name: Angstman, Andrew **Affiliation:** Tikchik Narrows Lodge

Community of Residence: Anchorage

Comment:

I was fortunate enough to hunt the Mulchatna herd during the heyday of the late 80's through the early 00's. I didn't know at the time that there were only 15,000 or so animals in the herd in the early 70's, but it stands to reason that now in the 2020's there are once again 15,000 or so animals. They will cycle back. The tundra has regenerated over much of their range after they totally overgrazed and destroyed it.

Placing so much of the pressure for the growth of the herd on predators is ridiculous. Bears serve many valuable purposes in southwest Alaska, both for big game hunters, photographers, and wildlife enthusiasts. For many of my guests who spend money that stays in Alaska, the highlight of their dream Alaskan fishing trip is seeing bears in their natural habitat. I vehemently oppose the “intensive management” plan, and would prefer that the state call it what it really is... an aerial slaughter.

Regards,

Andy Angstman

Owner/Operator

Tikchik Narrows Lodge



PC43

Name: Ann Whitelaw, Julie

Community of Residence: Australia

Comment:

This cruel slaughter of these magical creatures must end now



PC44

Name: Ansari , Mazhar

Community of Residence: India

Comment:

Wildlife is precious,we should take all efforts to save them.



PC45

Name: Anselmi, Giulia

Community of Residence: London, UK

Comment:

I oppose the proposed regulation to modify the Mulchatna caribou herd management area to allow for the take of brown and black bears by department staff to benefit the herd.

There is overwhelming evidence that predator control programs do not work to recover struggling moose and caribou populations. As per State’s own research, the main reason for the Mulchatna caribou herd decline are disease and lack of food (linked to climate change), not bear predation. There is also no credible scientific evidence that Mulchatna bears can be killed sustainably.



PC46

Name: Antonelli, Sheila

Community of Residence: Lakeshore

Comment:

Save the bears. So many other options. Please reconsider. Killing bears is not only ethically troubling but also ecologically short-sighted. Bears play a crucial role in maintaining healthy ecosystems—they disperse seeds, regulate prey populations, and even enrich forest soil through the remains of their prey. Removing them disrupts this delicate balance and can have long-term negative consequences for biodiversity. Additionally, bear-human conflicts are often the result of human encroachment and poor waste management practices, not the animals themselves. Rather than resorting to lethal measures, efforts should focus on non-lethal alternatives like public education, bear-proofing communities, and relocation. Protecting bears means protecting the integrity of Alaska's wild lands for future generations.



PC47

Name: Arambula, Kelsey

Community of Residence: California

Comment:

This needs to stop! This should be illegal for so many reasons. This is MURDER!!!!



PC48

Name: Arand, Rachael

Community of Residence: Langley

Comment:

Please consider the well being of animals who do not have a voice or a choice in their murder. They are beautiful animals who have families and who belong in the wilderness of Alaska. They do not deserve to be shot from the sky and killed in their home.



PC49

Name: Arcoite, Mason

Community of Residence: Nashua Newhampshire

Comment:

I may not have the knowledge or the ability to sway your minds, but please understand that killing bears by the dozens will not help environmentally, it does not help the ecosystem, we can coexist with these animals. One day humans will be next on the chopping block. Who will be there to save us?



PC50

Name: Arispe, Sandra

Community of Residence: Los Angeles

Comment:

I strongly oppose the take of brown and black bears by department staff to benefit the herd. There's no scientific evidence it would be beneficial. Please, do not kill wildlife. We must protect wild animals not kill. This is Alaska after all. Do better. I am from Los Angeles, California and visited Anchorage with family a couple of years back. We were drawn to visit to view wildlife. We would like to go again. If this passes, we will not forget it and you can forget counting on our tourism money.



PC51

Name: Arlan, Eric

Community of Residence: Florida

Comment:

Hell no



PC52

Name: Armbruster, Hannah

Community of Residence: Covington

Comment:

I am opposing this proposal. It is damaging to the bear population. This is not population management, it is slaughter. Bears are extremely important to Alaska's ecosystem and have a right to be there.



PC53

Name: Armes, Elizabeth

Community of Residence: Alabama

Comment:

I am vehemently opposed to the controlled elimination of the brown and black bears. Please consider a different plan of action. Thank you.



PC54

Name: Armstrong, Lorill

Community of Residence: Canada

Comment:

Don't want the bears shot exp moms with cubs!!



PC55

Name: Aruanno, June

Community of Residence: Virginia

Comment:

Protect wildlife at all costs!!!! We need wildlife!!!!



PC56

Name: Ashcroft , John

Community of Residence: Brampton, UK

Comment:

I'd like to add my support to stop this bear cull. Even though I'm a UK resident, I'm a bear lover. We need to protect these magnificent creatures. There's no scientific evidence for this cull and the fact that its in such a remote area of Alaska adds weight to why this is needed. Stop this unnecessary cull of these amazing animals.



PC57

Name: Askew, Susan

Community of Residence: Uk

Comment:

I am appalled by the murder of bears, including cubs. Humans are not the sole decision takers on the planet. They are not exceptional. They are not supposed to kill (God's commandment). These action are horrific and totally shameful. I demand this murder ends immediately in the name of humanity.



PC58

Name: Atkinson, Stuart

Community of Residence: Scotland

Comment:

We have no right as humans to kill these wonderful creatures, leave the beautiful animals alone.



PC59

Name: Avarell, Faye

Community of Residence: Utah

Comment:

Save the caribou?? What a lame reason for culling the bears.

Stop this - we want them to thrive. There are hundreds of thousands of caribou. They're ok.



PC60

Name: Avraham, Jill

Community of Residence: San Diego

Comment:

Killing animals from a helicopter is cruel and inhumane. I hate that this is happening and want to be a part of stopping this animal cruelty regardless of whatever reason these sick humans are using to try to justify this psychopathic behavior.



PC61

Name: Axe, Kathy

Community of Residence: Kure Beach NC

Comment:

Stop the killing!!!!!!!!!!



PC62

Name: Azar, Niekü

Community of Residence: Las Vegas

Comment:

I firmly believe that this considered practice to hunt our precious wildlife is egregious, the sheer disrespect to our fellow American citizen that this is even considered an option. I am not in favor of this cowardice way to try to expand land or the extremely idiotic idea that this will allow a marginal amount of caribou and other animals will live. God has chosen how nature works and for us to try to play god in our favor is despicable



PC63

Name: Azlin, Pat

Community of Residence: Out of State Tourist

Comment:

On behalf of the many tourists who spend thousands of dollars in Alaska to watch and appreciate wildlife and, esp, bears, I'd object to the mass slaughter of bears. The courts already decided this action is illegal and I ask the Governor to stand up and support Rule of Law in Alaska. Alaska is already heavily hit by federal cuts to spending in the most essential areas for many Alaskans, it's unconscionable to spend over one million dollars on bullets and helicopters for what is now twice ruled by courts as an ILLEGAL activity.



PC64

Name: B , Rebecca

Community of Residence: Sitka

Comment:

100% oppose this.

There's no reason to do this at all. The wildlife was here first. You are destroying the ecosystem and it is frankly animal cruelty .

I Strongly oppose shattering the wildlife population and their habitat.



PC65

Name: B, Dileepkumar

Community of Residence: California

Comment:

This is totally unethical and stop this at once. Acting based on unscientific information is simply pathetic. STOP YOU MORONS.



PC66

Name: B, Karmen

Community of Residence: Alaska

Comment:

It is inhumane to kill bears in Alaska just to protect another species, the caribou. Bears play a crucial role in the ecosystem by maintaining balance, controlling other animal populations, and helping to spread nutrients through their foraging. Caribou numbers are influenced by many factors beyond just bear populations, including habitat loss, climate change, and other predators. If we start eliminating bears, we could disrupt the entire food chain, potentially worsening conditions for other animals or creating new

problems. Instead of reaching for a rifle, we should focus on smarter solutions, such as protecting caribou habitats and addressing human impacts. By doing this, we can help Alaska's wildlife thrive without upsetting the ecological balance.



PC67

Name: B, Pragna

Community of Residence: Pennsylvania

Comment:

Why wildlife is always the problem

God created us to look after each other and to live life along with all other species

Alaska if you take out wildlife u know the answer Nature will come after humankind



PC68

Name: Baca , Julio

Community of Residence: Co co county

Comment:

This is downright cruel no animal should be treated like this or hunted like this regardless of species.



PC69

Name: Bachenheimer, Ronda

Community of Residence: New York

Comment:

Dr. Ronda Bachenheimer

[REDACTED]

East Meadow, NY 11554

[REDACTED]

June 23, 2025

Alaska Board of Game

P.O. Box 115526

Juneau, Alaska 99811-5526

Subject: Opposition to Proposed Bear and Wolf Hunts Near Key Protected Areas

Dear Members of the Alaska Board of Game,

I am writing to express strong opposition to any proposals that would authorize the hunting of bears and wolves in areas bordering Lake Clark National Park, Katmai National Park, the McNeil River State Game Sanctuary and Refuge, Brooks Falls, the Togiak National Wildlife Refuge, and the Yukon Delta National Wildlife Refuge.

These regions are internationally renowned for their spectacular concentrations of brown bears .Each year, they attract tens of thousands of wildlife enthusiasts, photographers, filmmakers, and ecotourists—generating significant economic revenue for nearby rural communities and businesses. Visitors come from around the world to witness the iconic bear activity at places like Brooks Falls, Lake Clarke National Park, and Katmai National Park to explore the rich biodiversity of these wild landscapes. Wildlife-based tourism in these areas provides long-term, renewable economic benefits that far outweigh the short-term gains of a bear or wolf hunt.

Beyond the economics, these animals are integral to Alaska’s cultural heritage and ecological identity. For Indigenous communities and many residents, bears and wolves hold spiritual and cultural significance, representing ancestral connections to the land, traditional knowledge systems, and deep respect for nature. They are also vital to ecosystem health, playing crucial roles in nutrient cycling and population regulation.

Permitting predator hunts along the borders of these protected areas—especially where bears and wolves are habituated to human presence—jeopardizes the very wildlife experiences that draw people to these locations. The McNeil River, Togiak National Wildlife Refuge, and the Yukon Delta National Wildlife Refuge bears, for instance, are globally celebrated for their unique, non-aggressive behavior developed over decades of protected status. Allowing nearby hunting not only undermines this rare dynamic, but also threatens the credibility of Alaska’s wildlife management practices.

I urge the Board to take a forward-looking approach and protect the economic and cultural value of these apex predators by rejecting any expansion of hunting near these key conservation areas. These landscapes—and the magnificent creatures they support—deserve policies rooted in stewardship, science, and sustainability.

Thank you for considering this request. I respectfully ask you to preserve what makes Alaska extraordinary for future generations.

Sincerely,

Dr. Ronda Bachenheimer



Board of Game Special Meeting Comments for July 14, 2025

I ask you to **OPPOSE Special Meeting Proposal 1** based in part upon the decision and order from the Alaska Superior Court, March, 2025. The order clearly states that the Board of Game (BOG) lacked sufficient population and distribution information to implement intensive management for bears in this area of the state. Further, that the BOG failed to comply with the sustained yield provision of Art VIII, Sec. 4, of the Alaska Constitution.

“The State's admission that the BOG lacked sufficient bear population and distribution information illustrates the BOG failed to consider all the factors that are important and relevant to assure sustainability of the bear population. The State's position misapprehends clear directives contained in case law. Other than the anecdotal evidence in the record when the BOG heard testimony suggesting that ‘brown bears are widely distributed in Unit 17 in abundance,’ there is no credible scientific evidence in the record or discussion by the BOG to support the conclusion that bears could be killed sustainably”.

“the Alaska BOG failed to comply with the sustained yield provision of Art VIII, Sec. 4, of the Alaska Constitution by failing to consider all the important, relevant and material factors relating to the sustainability of a replenishable public wildlife resource prior to adoption of a regulatory proposal impacting a replenishable public resource”.

Additionally, as stated below in my BOG Proposal #18 for the January, 2025 Central and Southwest Meeting to shorten the brown bear hunting season in GMU 9C which borders GMU 17 Intensive Management Area:

“Bear viewing guides in this area have reported a decline in the number of bears, most notably trophy class mature males, observed by their client. While there may be multiple factors causing the viewable number of bears to decline, we don't know for sure the full range of the causes. However, a logical person would conclude that the GMU 17 IM programs could be having an adverse effect on bears in GMU 9C. Additionally, there is no recent population data and harvest analysis provided by the National Park Service or ADFG in Units 9C, UCUs 702 and 703.”

One of the stated goals of ADFG’s Bear Conservation, Harvest, And Management Policy (Exp July, 2028) is *“To recognize the importance of bears for customary and traditional uses, viewing, photography, research, and non-consumptive uses in Alaska”*.



Failure to properly manage slow reproducing brown bear populations on the Alaska Peninsula puts at risk one of the world's premiere brown bear viewing areas. These bears become habituated to human observation and the result is bear viewing unlike anywhere else in the world. This is exemplified by the volume of people that utilize bear viewing guides each summer and pay significant money to observe these bears. The close proximity of these bears to Alaska's major population centers has created a unique bear viewing opportunity that provides jobs and a good source of income to remote lodges on the Alaska Peninsula and bear viewing guides living on the Kenai Peninsula, King Salmon, and Kodiak.



PC71

Name: Badenhorst , Suzanne

Community of Residence: South Africa

Comment:

I am opposed to the innocent killing of the bears in such an inhumane way and support the cause to save the bears



PC72

Name: Badna, Beatrice

Community of Residence: Sweden

Comment:

Killing them makes no sense!



PC73

Name: Baer, Caroline

Community of Residence: Fircrest wa

Comment:

I am writing to decry the killing of wolves and bear in this wilderness area. While it can seem that eliminating predators will lead to an influx of prey animal such as the caribou, numerous scientific studies have shown that culling predators only negatively affects prey creatures. Instead, access to food and appropriate, safe habitat is the correct way to aid in the regrowth of the herd. Please do better.



PC74

Name: Bailey Dobson, Sarah

Community of Residence: Alaska

Comment:

This is THEIR AREA!!! Leave them alone for gods sake.



PC75

Name: Bailey, Cynthia

Community of Residence: Pmb 281281

Comment:

Alaska is so massive that there must be many places these bears can be moved to. The answer should not be to just kill them. Please consider other ways to help the herd. 🙏



PC76

Name: Bains , Amar

Community of Residence: Canada

Comment:

Bears shouldn't have to face such a tragedy. They are roaming around on their own land! We have no right to kill them!



PC77

Name: Bakkali, Amina

Community of Residence: Germany

Comment:

I am against the killing of wildlife. Humans have already done enough damage all around the globe. Humans are still doing so much damage day after day. This is unfair and cruel. Killing cubs and their mothers is unfair and cruel. This has to stop. Nothing can justify this!!! We have no right to decide which wild animal gets to live and which one gets to die.



PC78

Name: Balachander, Krishna

Community of Residence: Stormville

Comment:

Protect the bears !



PC79

Name: Balan, Maya

Community of Residence: Madison

Comment:

Save the bears!!!! They should not be slaughtered from a helicopter.



PC80

Name: Bales, Sandra

Community of Residence: Bears should not be killed. They are God's creatures that deserve to live

Comment:

Please don't kill God's creatures. They have the right to live



PC81

Name: Ballard, Hayley

Community of Residence: USA

Comment:

I oppose this regulation. Given that brown and black bears play crucial roles in supporting Alaska's ecosystems, including seed dispersal, enrichment of forest soil, and the balancing of prey populations, allowing bears to be killed indiscriminately could potentially have very negative consequences on the ecosystem. I would like the Board to consider if there aren't better ways to balance the bear and caribou populations.



PC82

Name: Ballard, Jordan

Community of Residence: Oklahoma

Comment:

Inhumane, unethical and indefensible use of taxpayer money!

06/20/2025

Board of Game
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

Subject: Opposition to Proposed Regulation Allowing In-State Aerial Gunning of Bears

Dear Members of the Board of Game,

I write as a concerned citizen who deeply values Alaska's unique wildlife and ecological heritage. I understand that at your Special Meeting on July 14, you will consider regulation changes that would allow the Alaska Department of Fish & Game (ADF&G) to conduct bear control—including aerial gunning—over approximately 40,000 square miles in western Alaska.

While I appreciate the concern for the Mulchatna caribou herd, I strongly believe that this approach is misguided, unjustified, and ultimately damaging to our ecosystems. My opposition is grounded in the following concerns:

1. Lack of Scientific Basis & Unintended Consequences

- A state evaluation acknowledged that key factors driving caribou decline include disease, habitat degradation, and climate stress—not predation.
- Independent research warns that killing adult bears disrupts social learning in bear communities, increasing cub mortality and long-term population instability.

2. Ethical Concerns & Public Trust

- Aerial gunning is seen as an unethical, indiscriminate method lacking regard for family bonds—bears, especially mothers and cubs, are routinely killed.
- Recent court rulings found that ADF&G acted in "bad faith" by continuing the Mulchatna bear cull under void emergency regulations—highlighting a troubling erosion of public trust.

3. Legal and Constitutional Issues

- Alaska's Constitution protects wildlife as a public trust resource—bear



populations cannot be culled without careful justification and science-based oversight.

- Courts have invalidated the Mulchatna bear control program due to lack of public input, review, and transparency.

4. Economic and Cultural Concerns

- Ecotourism and wildlife viewing—bears included—are significant contributors to Alaska's economy. The international backlash and boycotts following aerial gunning have already caused economic harm.

- Many Alaskans, including subsistence communities, cherish bears not only materially but also culturally. The aerial killing of bears is deeply painful and damaging to Alaska's cultural identity.

Recommended Alternatives

I respectfully urge the Board to:

1. Withdraw or significantly revise the proposed bear-control regulation—particularly the sections allowing in-state aerial gunning.
2. Require rigorous, independent scientific review of population-level effects and ecosystem implications.
3. Explore non-lethal alternatives—such as habitat improvement, monitoring, targeted deterrence, and predator exclusion in calving grounds.
4. Engage in a truly public process, including Alaska Native and subsistence communities, before making any regulatory change involving predator control.

Conclusion

Alaska can—and must—do better. Alaska needs ethical, science-based wildlife management that upholds public trust—not shocking, unjustified mass killings. I urge you to oppose the current regulation proposal and seek more balanced, sustainable solutions for Alaska's wildlife and communities.

Thank you for your time and consideration. I welcome any opportunity to provide further information.

Sincerely,
Amanda Banwart



PC84

Name: Baranowski, Portia

Community of Residence: Inlet Beach FL

Comment:

This should not be allowed or performed. Innocent bears do not deserve to die. Wild animals don't have a voice and you don't get to take that from them.



PC85

Name: Barclay, Cindy

Community of Residence: British Columbia

Comment:

I totally oppose this plan to kill more grizzly bears. Scientific evidence does not support this plan either. With previous wolf culling, the caribou herd still declined. I frequently spend money to go to Alaska to view these beautiful bears and killing them is not the answer. We know that the decline in caribou herds is simply man-caused- taking away their habitat, more humans infringing on their territory, etc



PC86

Name: Barclay, Jaymie

Community of Residence: Ontario, Canada

Comment:

This is a senseless act, please do not harm the bears, they deserve to be here more than humans.



PC87

Name: Barillas, Julissa

Community of Residence: Bronx

Comment:

Stop slaughtering innocent animals for your benefit and corporations



PC88

Name: Barnes, Debbie

Community of Residence: Uk

Comment:

We kill everything then wonder why animal become extinct please stop



PC89

Name: Barnhart , Jennifer

Community of Residence: Hamburg NJ

Comment:

I do not support nor do I agree with killing/murdering any type of wild life especially bears. If it's for the safety' of tourists then tourists need to respect any wildlife's habitat and not encroach on their environment. The woods/wilderness belongs to the bears, the wildlife. We, has humans, should be grateful they allow us to share it with them. But that was and is their home first and will always be their home and we as humans need to respect that. So DO NOT kill bears!!!!



PC90

Name: Barraza, Marcel

Community of Residence: SAN Francisco

Comment:

The Alaska Department of Fish and Game's bear culling program is a reckless gamble with nature's delicate balance, sacrificing majestic bears to prop up caribou and moose populations without ironclad evidence. This shortsighted slaughter, often executed with brutal aerial shootings, ignores the lessons of history—think Australia's dingo debacle or Yellowstone's wolf blunder—where culling apex predators triggered ecological chaos, from overgrazing to biodiversity collapse. By prioritizing human hunting interests over the intricate web of life, Alaska risks unraveling its own wilderness, trading fleeting gains for long-term devastation. Stop this misguided massacre before it backfires, leaving ecosystems in ruin and bears as tragic casualties of hubris.



PC91

Name: Barrera, Karely

Community of Residence: Palmdale

Comment:

The bears are apart of the ecosystem and they did nothing to bring this death on them. They are just trying to live.



PC92

Name: Barth, Courtney

Community of Residence: Leesburg, Virginia

Comment:

I do not support the aerial management of the brown and black bear population. There is not enough science to support this management method and it is cruel to the bears. To risk the separation of a mother

from her young is a cruelty that humans should avoid. We are supposed to be the superior species and in recent years all of our actions against our environment and wildlife seem to do nothing but prove otherwise. Aerial hunting of the brown and black bears is disgusting and cannot be permitted. Bears must be allowed to be bears and humans need to stop encroaching into their territory.

1. Disruption of Ecosystem Balance

Brown bears are apex predators and keystone species. They play a critical role in regulating prey populations (e.g., moose, caribou) and in shaping the structure of ecosystems through nutrient redistribution. For example, salmon consumed by bears fertilize forest ecosystems with marine-derived nutrients, enhancing tree growth and overall biodiversity.

Aerial hunting can lead to:

- Artificially lowered predator populations, disrupting natural predator-prey dynamics.
- Cascading ecological effects, where overpopulation of herbivores leads to habitat degradation, such as overgrazing and loss of biodiversity.

Scientific Evidence:

- Ripple et al. (2014) highlighted the top-down control that large carnivores exert on ecosystems, and warned against their removal.
- Levi et al. (2012) demonstrated that reduced bear densities affect salmon population dynamics and forest health.

2. Violation of Evolutionary and Behavioral Integrity

Aerial hunting selects against certain individuals, such as large males, who are more visible and more likely to be targeted. This introduces unnatural selection pressures that may alter bear behavior and gene pool quality over time.

Consequences include:

- Loss of genetic diversity, which undermines population resilience to disease and environmental change.
- Disruption of social structures, as dominant males often suppress infanticide by subordinates.

Scientific Evidence:

- Milner et al. (2007) found that unnatural mortality patterns, such as those from selective hunting, can destabilize bear populations and lead to increased cub mortality.

3. Inaccuracy in Population Management

Aerial shooting often lacks scientific rigor and precision in estimating and managing bear populations. Without robust monitoring data, aerial hunts risk:

- Overharvesting, especially in regions where population estimates are outdated or incomplete.
- Failure to differentiate between local subpopulations, some of which may be more vulnerable than others.

Scientific Evidence:

- A 2018 Alaska Department of Fish and Game report acknowledged significant uncertainty in brown bear density estimates, warning that overreliance on aerial culling could harm certain populations.

4. Ethical and Welfare Concerns with Scientific Relevance

From a biological and ethical perspective, aerial hunting often results in:

- Poor shot placement, due to movement of aircraft and terrain, increasing the likelihood of wounding animals rather than clean kills.
- Extended suffering, violating principles of humane wildlife management and animal welfare.

Stress and injury can also affect biological parameters such as hormone levels and reproduction, altering scientific assessments of bear health and behavior.

Scientific Evidence:

- Baker et al. (2011) examined aerial culling practices in various wildlife species and concluded that animal welfare concerns were often ignored in predator control programs.

Conclusion

From an ecological, evolutionary, and ethical standpoint, aerial shooting of Alaska brown bears is a scientifically flawed management strategy. It undermines ecosystem stability, introduces harmful selection pressures, risks population overharvesting, and causes unnecessary suffering. Effective predator management should be based on sound ecological science, long-term monitoring, and humane principles—not expedient but biologically disruptive practices.



PC93

Name: Bates, Cherith

Community of Residence: Chugiak

Comment:

I am totally against slaughtering bears from the air. I understand and support population control, but not aerial hunting of any kind.



PC94

Name: Bates, Chuck

Community of Residence: Michigan

Comment:

There is absolutely no proof that killing these bears will bring the required results.



PC95

Name: Bates, Ella

Community of Residence: United states

Comment:

Save the bears!



PC96

Name: Battey, Jane

Community of Residence: Great Britain

Comment:

Yes I don't live in a country where we have bears but we do have wildlife life that sometimes has to be humanly culled. This proposal sounds like it was planned by a bunch of sick people who think it will be a fun activity to tell their mates about later! If bears need to be culled there surely needs to be a humane way that doesn't involve a pot shot helicopter and mothers with cubs.



PC97

Name: Battistone, Carolina

Community of Residence: Utah

Comment:

Save the bears!! Any action to further intervene in natural ecosystems will eventually have catastrophic consequences.



PC98

Name: Batzoli, Vasiliki

Community of Residence: Thessaloniki

Comment:

I strongly oppose the practice of shooting bears in Alaska, especially in protected areas and during vulnerable times like denning season. These magnificent animals are a vital part of our ecosystem and deserve our respect and protection—not to be hunted for sport or convenience. Preserving Alaska’s wildlife is not just about protecting animals, but about safeguarding the balance of nature and the integrity of our wild spaces for future generations. I support stronger regulations to protect bears and all native wildlife.



PC99

Name: Baumgart, Bethany

Community of Residence: Guam

Comment:

There is no supportive evidence that will prove the killing of these bears helping populations of other endangered species. Leave the bears alone!

Name: Bavilla, Janet **Affiliation:** City of Platinum

Community of Residence: Platinum

PC 100 Comment: see attached

**PC101****Name:** Bayer, Brooke**Community of Residence:** Saint Hedwig, Texas**Comment:**

This idea that harming innocent animals as a way to raise the number of others always leads to issues with the ecosystem. As a Masters of Biology Student who has taken multiple courses in ecology, this dramatic drop in predators can have other effects on the environments and the population of other prey for them. While there is no current evidence that killing these bears will have a positive effect on the caribou population, there is direct evidence that removing natural predators from an ecosystem only causes damage in the long term. There are other methods that conservation efforts have been using for years to increase population sizes that do not require the senseless loss of another species. The decision to pass acts to protect nature by Theodore Roosevelt was in an effort to conserve the environment that is necessary for species to survive, and the departments that have developed to support these acts have cause positive and negative impacts on the species that they were trying to protect. The most well known example of this would be the extirpation of wolves from Yellowstone national park, which lead to a boom in the deer population but also overgrazing causing the deer and other populations that relied on vegetation as a food source to see a large decline in the population size over time. In my opinion this is an attempt at a permanent solution for a momentary problem that will cause larger impacts on the ecosystem than just increasing the caribou population.

**PC102****Name:** Beal, Families**Community of Residence:** Anchorage**Comment:**

Our families strongly oppose the new Mulchatna bear control program. These animals are part of our wild landscape and should not be gunned down by a helicopter or culled by any other means. They are needed in our environment and we need to stop managing their numbers as nature will manage it.

**PC103****Name:** Becker , Stephanie**Community of Residence:** Vancouver, Canada**Comment:**

This senseless killing of bears needs to STOP. We should be protecting these beautiful creatures NOT slaughtering them. Do better Alaska!!



PC104

Name: Becker, Sarah

Community of Residence: Maine

Comment:

Please find an alternative to killing these bears.



PC105

Name: Becker, Tiffany

Community of Residence: Seward

Comment:

I do not support this. It has been ruled illegal before. The same arguments apply and continue to be valid



PC106

Name: Bednar, Jenna

Community of Residence: King of Prussia

Comment:

Please do not reinstate this gunning program.



PC107

Name: Bedore, Karolyn

Community of Residence: Albany, New York

Comment:

I am writing to express my strong opposition to invasive predator management strategies, particularly the systemic organized killing of wild brown bears. Such measures are not a sustainable or ethical solution to restoring caribou populations. Effective conservation MUST address the root causes of caribou decline—primarily habitat loss and human disturbance—rather than relying on short-sighted and destructive interventions that disrupt ecological balance. I urge the board to prioritize habitat protection and science-based, non-lethal approaches to wildlife management. Thank you.



PC108

Name: Bejoy, Bhadra

Community of Residence: USA

Comment:

This is not being carried out correctly. Beotecting biodiversity and the Carobou is incredibly important but this is not the way to do it. It needs to be more researched and calculated, killing just any bear we see will endanger the bear population as well. We have seen this through our history.



PC109

Name: Bell, Taylor

Community of Residence: Florida

Comment:

Nature is apart of our ecosystem and this have a vital role to play in the balance of the very Framework of ur world. Even if you manage something like an Apex predator their job is to naturally maintain balance.

Your commuting eco terroism ? Sitting harming the environment and managing the balance which could in turn ultimately manage and kill humans because even we are apart of the ecosystem chain and our actions won't be insignificant, they will be life altering and as leadership you should be not only KNOWING this but being more responsible.



- Akjak
- Akiachak
- Alakanuk
- Andreafsky
- Aniak
- Anvik
- Atmaultluk
- Bethel
- Bill Moor e's Slough
- Chefomak
- Chevak
- Chuathbaluk
- Chuloonawick
- Crooked Creek
- Eek
- Emmonak
- Georgetown
- Grayling
- Hamilton
- Holy Cross
- Hooper Bay
- Kasigluk
- Kipnuk
- Kongiganak
- Kotlik
- Kwethluk
- Kwigillingok
- Lime Village
- Lower Kalskag
- Marshall
- Mekoryuk
- Mountain Village
- Napaimute
- Napakiak
- Napaskiak
- Newtok
- Nightmute
- Nunam Iqua
- Nunapitchuk
- Ohogomiut
- Oscarville
- Paimute
- Pilot Station
- Pitka's Point
- Quinagak
- Red Devil
- Russian Mission
- Scammon Bay
- Shageluk
- Sleetmute
- St. Mary's
- Stony River
- Toksook Bay
- Tuluksak
- Tuntutuliak
- Tununak
- Umkumiut
- Upper Kalskag

**YUKON-KUSKOKWIM HEALTH CORPORATION
RESOLUTION NO. 2025-06-02**

SUBJECT: A Resolution of the Yukon-Kuskokwim Health Corporation Supporting Alaska Department of Fish and Game Predator Control Measures to Revitalize the Mulchatna Caribou Herd Population.

WHEREAS, the Yukon-Kuskokwim Health Corporation (YKHC) is the Tribal health organization administering health care services to 50 rural Alaska Native communities in Southwest Alaska; and

WHEREAS, subsistence fishing and hunting practices are essential to the well-being and health of residents of our region; and

WHEREAS, Alaska is facing shortages of certain, crucial fish and game subsistence resources around the State, which are deeply felt in the Yukon-Kuskokwim region, as king and chum salmon return in fewer numbers and the Mulchatna caribou herd population, which once peaked at 200,000 caribou, has collapsed to about 13,000; and

WHEREAS, the dwindling Mulchatna herd numbers and the restricted subsistence hunting opportunities that the Alaska Department of Fish & Game (ADFG) are able to provide have had a negative impact on food security in our region; and

WHEREAS, at the same time as subsistence fishing and hunting opportunities have become more limited, our region has faced rising food prices at local stores, making it more difficult for residents to feed their families with healthy foods; and

WHEREAS, ADFG has worked to restore subsistence caribou hunting opportunity over the past two years by engaging in intensive management, also known as predator control measures, to revitalize the Mulchatna caribou herd, with the goal of returning the caribou population to between 30,000 and 80,000 caribou, enough to support hunts of 2,400 to 8,000 animals a year; and



WHEREAS, ADFG's predator control methods are limited and geographically targeted to preserve and protect caribou calving opportunity in Game Management Units 17 and 18; and

WHEREAS, ADFG and local hunters have observed the positive effects of predator control, including evidence of increased calf survival and growing herd numbers; and

WHEREAS, YKHC agrees with ADFG and hunters in our region that without predator control measures, subsistence hunting will remain closed for future seasons, and that these measures are necessary to ensure sustained subsistence hunting opportunities over time; and

WHEREAS, ADFG's predator control program has faced legal challenges that jeopardize the protection of the herd for this season; and

WHEREAS, YKHC expresses support for ADFG's predator control efforts that have and will continue to be conducted in accordance with intensive management protocols, state law, and the Alaska Constitution.

THEREFORE, BE IT RESOLVED THAT the Yukon Kuskokwim Health Corporation supports ADFG's predator control measures to protect the Mulchatna Caribou Herd and restore its population numbers to a sustainable level that will allow caribou subsistence in our region for this and future generations; and

BE IT FURTHER RESOLVED THAT, the Yukon-Kuskokwim Health Corporation submits this Resolution 2025-06-02 to the Bethel Advisory Committee and requests that the Advisory Committee vote to support all Board of Game actions authorizing intensive management in the Game Management Units 17 and 18 to protect the Mulchatna Caribou herd and ensure sustained subsistence hunting opportunities in the future.



Certification

Duly adopted at the meeting of the Yukon-Kuskokwim Health Corporation Executive Board of Directors, a quorum being present, by a vote of 7 in favor, 0 opposed, and 1 absent, this 6th day of June 2025.

Signed: _____

Moses Owen, Chairman

Signed: _____

Darren Cleveland, Secretary



PC111

Name: Bennett, Cathleen

Community of Residence: Anchorage, AK 99517

Comment:

My name is Cathleen Bennett and I am a resident of Alaska. I strongly oppose adoption of 5 AAC 92.111. Intensive Management Plans for many reasons, but I write here about the two most important grounds for my objection. Science and research show that it will not work, and the plan is bad for Alaska's economy which relies more and more on the tourist industry.

First, not only is its efficacy unsupported by the overwhelming weight of scientific research, that research contradicts the premise on which the proposed management plan is based. Climate change and weather have reduced the amount of lichen available for the caribou herd to eat and sustain itself. Disease has been a major cause of the loss of caribou numbers. Predation of bears and wolves has not increased the percentage of surviving caribou calves. In fact, those numbers have decreased. The causes of death of a large percentage of calves that died were unrelated to predators - they died from disease, and inability to thrive, low fat content in their bodies. In the last assessment of the cause of death for the calves, not one black bear was found to be responsible. Moreover, ADFG has not studied nor established baseline numbers of bears living in the region, not the impact of killing them on the population of bears in the region. It has not assessed the negative impacts that killing so many bears will have on the ecology of the region as bears disperse seeds and add nutrients to the land when they drag salmon to shore. In addition, there is no limit on the number of bears to be killed during the plan's operational period - the plan is to kill every brown and black bear encountered by those executing the plan in the field. And there is not scientifically based target number for the killings that would supposedly benefit the growth of the caribou herd. It was disturbing to learn that the native and other communities did not even want the meat from the bears killed in the operation, and that the hides were not collected because they were worthless (no doubt from all the holes caused by bullets fired from aircraft). Of course, these science-based objections have been well documented in research journals and studies. They have been cited by scientists, wildlife biologists and former employees of ADFG with "over 1000 years of experience" working in the field here in Alaska in public objections to the Intensive Management Plan. It is unconscionable that the plan was developed behind closed doors and without the benefit of public input and scientific rigor. And that you continued killing bears despite a court ruling. And that you intend to continue killing bears under the plan until 2028. This plan was developed and administered at the expense of taxpayers. It should not continue in the face of opposition from a significant number of Alaskans.

Second, the Alaska economy is increasingly dependent on tourism. The Katmai Bear Cams set up and run by the National Park Service and Explore.Org have world-wide reach. It is the way that I became aware of the magnificent annual enactment of a pure ecosystem working cyclically as it should - when the salmon run in Katmai National Park and the brown bears show up at Brooks River to feed on them. I and many of my friends across the country watch the cams almost every day. The number of dedicated watchers increases every year as proven in part by the growing number of watchers who not only watch but also comment on the explore.org site, the Facebook group followers, the numbers of people who vote in the Fat Bear contest, and the number of people who, like me, donate to the Katmai Conservancy each year. I have gone to Brooks River to see the bears and salmon. I intend to return as often as I can to watch them. I personally know many others who intend to visit travel to Alaska to see our beautiful state

and its wildlife, and Katmai is at the top of the list for them of experiences they want have here. A quick perusal of the public's comments on the bear cams indicates that a great many people are influenced by their experiences watching them to travel to Alaska to see the bears. The bears are very important to me personally. The region affected by the plan is 40,000 miles and less than 100 miles from Brooks Falls. Bears are known to travel great distances. It highly likely that Katmai bears have been killed since the plan began.

Instead of killing bears despite the historical evidence that it will not improve the prospects of the Mulchatna caribou herd's growth, ADFG should dedicate itself to finding ways to mitigate the impact of climate change on the food sources and health of the caribou, and the enforcement of hunting restrictions on the herd. Reversing course on this management plan will require integrity, humility and wisdom. Even pausing the plan to collect foundational information about the bears, their numbers and impact on the ecology of the region, as well rigorously assessing whether the plan achieves its goals is essential to fulfilling your duty to manage all the wildlife in the Mulchatna region, and your duty to all Alaskans.

Note: for your convenience I have also uploaded my comment opposing the plan as a pdf.



PC112

Name: Bennett, Jody

Community of Residence: Florida

Comment:

My spouse and I visit Alaska and its many national parks to enjoy nature and wildlife, and specifically, the bears.

We typically spend many thousands of dollars on our trips.

As a hospitality executive in a tourist town, we know the importance of visitors like us to your beautiful state. We, and many others like us have a positive impact on your economy.

Katmai is a beautiful, unspoiled area home to thousands of bears. Many of the bears are well known to nature camera viewers. The nature cameras are how we first learned about Katmai, the bears, and began supporting the economy there because of our love for the bears.

Bears roam all over the park.

We implore you to stop the killing of these beautiful and beloved animals.



PC113

Name: Bennett, Liz

Community of Residence: Farmington, CT

Comment:

I am horrified to hear of the massive extermination of bears for the alleged benefit of caribou. This practice must be stopped immediately.



PC114

Name: Benning, Don

Community of Residence: Wisconsin

Comment:

I am in opposition of the killing of the bears. This should be the last option to wildlife 'management'. Have some vision, some compassion for wildlife and our ecosystem. We've been a country for 250 years and all we can come up with the entire time is kill everything in humans path? Be better.



PC115

Name: Berdecio , Gabriela

Community of Residence: Navarra

Comment:

Killing wildlife isn't wildlife protection!



PC116

Name: Berg, Merlyn

Community of Residence: AB

Comment:

Please stop killing animals, including bears. Gunning them down from helicopters, not having scientific basis, basically, killing them for no good reason, is a very corrupt, selfish act.



PC117

Name: Berg, Tiffany

Community of Residence: Washington State

Comment:

Killing bears in an attempt to protect the caribou is absurd - there is no proof disposing of predators is a sure way to save the caribou. Humans should not play be playing God by taking lives; especially by shooting animals from the sky allowing them to potentially suffer!



PC118

Name: Berk, Elena

Community of Residence: San Jose

Comment:

I have seen bears twice in my life. They are beautiful, majestic creatures that define our great outdoors. It makes absolutely no sense to slaughter bears for doing what they're meant to do - to survive in the great outdoors. Please - LEAVE THEM ALONE! Don't destroy one of Alaska's greatest features! Protect nature - don't destroy it!



PC119

Name: Bernath, Jodi

Community of Residence: Victoria, BC

Comment:

Stop killing bears!!!! wtf??



PC120

Name: Berrens, Zachary

Community of Residence: Anchorage

Comment:

As a scientist and as someone with ties to the tourism industry in Alaska, I am disappointed that such an unscientific strategy is being considered, especially when it potentially has direct downstream negative impacts on a growing wildlife viewing tourism industry. The bears in Alaska make national and international news as a bright spot in Alaska, and I cannot understand why you would jeopardize that resource by a method that has been proven to be unsuccessful in achieving the ends it is trying to achieve.



PC121

Name: Beseda, Veronica

Community of Residence: Washington state

Comment:

Bears are vital to our ecosystems and biodiversity. I oppose shooting bears or bear cubs. I think this is cruel and vile. We need better solutions to problems humans manufactured and created. We continue to use and abuse nature and wildlife. It's sickening. Do better.



PC122

Name: Bevacqua, Karen

Community of Residence: Canada

Comment:

How cruel can humans be to shoot the bears mothers and babies do you have no heart we need to stop the cruelty and be kinder



PC123

Name: Bhale, Pooja R **Affiliation:** Protecterra

Community of Residence: India

Comment:

STOP THE UNETHICAL BEHAVIOUR. ANIMALS ARE SENTIENT AND THIS IS A SHARED PLANET. PLEASE STOP.



PC124

Name: Bianco, Annalysia **Affiliation:** The wildlife collective

Community of Residence: Nevada

Comment:

To whom it may concern,

It is imperative that some humanity is brought to our Earth. With the suffering being caused worldwide at the hands of humankind is running rampant, we exploit and abuse animals in the background. Scientifically, animals, especially mammals, have great emotional intelligence and social relationships. While I presume power of authority of such scales cannot reach out a heartfelt hand to the innocent lives they disrupt and end, I will still beg for justice...and those of us that cannot speak for ourselves, such as these bears that are being wiped out from helicopters, deserve a voice more than anyone. There is no evidence to prove that this will benefit the environment substantially. So, I ask, do you mean to shoot down animals from helicopters, ending their lives, or worse, possibly severely wounding them and letting them bleed out? Do you, as a human being, not recognize the power we have over these beings, and how you abuse that power so righteously? Did you, as a child, envision a world where this was the solution? I will await a response, but I will not hold my breath.

Thank you for your time.

Annalysia Bianco

██████████



PC125

Name: Bibelheimer, Jewel

Community of Residence: Texas

Comment:

I am in opposition of the removing of bears with no regard for age, gender, or physical condition. I am in opposition of this proposal as it seems to remove any bear in sight for no purpose. Bears in this area are not over populated and the ecosystem is not failing. We do not need to remove healthy predators form the environment.



Name: Bielawa, Cameron

Community of Residence: California

Comment:

Please protect the wildlife of your community that will become the foundation for the future generations. There is no evidence that killing predators will help caribou populations. However, ensuring there is plenty of wild space and limiting human pollution and engagement in the ecosystem may help over mass killing other innocent animals. Please also protect the wolves of your community.



Name: Theresa Bielawski

Community of Residence: Fair Oaks, CA

Hello,

I am shocked, disgusted, and filled with dismay over the decision to allow the ariel predator eradication planned of the Mulchatna bears and other predators in 2025 and now 2026. Where is the science showing this “Bear Control” is necessary? Sorry, not convinced this is even close to being necessary.

My first trip to visit Alaska was in April of 2013 in which I visited Juneau & Haines for a week. My most recent trip was to Brooks Camp in Katmai National Park in September 2024. That trip was my 25th trip to Alaska and I have visited every year between 2013 and 2024 from one to four times per year. Of those trips, at least 20 of them included at least one trip to view and photograph bears. I have been to Kaktovik twice to view polar bears, Anan twice for brown & black bears, Lake Clark, McNeil, Hallo Bay, Kodiak, North Frasier Lake and Geographic Harbor to view brown bears. In addition, I have been to Brooks 16 times. My stays in Alaska were typically between 12-25 days. With exception to my first trip to Brooks in 2013, which was a day trip, all my other bear trips were at least 4 days, some as many as 7 days. Most bear trips included friends that formerly had never visited Alaska, i.e. additional dollars spent in your state. In addition to my bear trips, I have traveled the state and have seen more than many Alaskans that live there. I always rent a car and stay in hotels. I have stayed in or near Fairbanks, Kaktovik, Chena Hot Springs, Denali NP, Lake Clark NP, Kenai Fjords NP, Seward, Kenai, Soldotna, Homer, Girdwood, Anchorage, Valdez, McCarthy, Kennicott, Chitna, Healy, Talkeetna, Kodiak, Wasilla, Seldovia, Tok and probably several more that I am forgetting. I have done plane and helicopter tours around Alaska, taken train trips, aurora tours, dog sledding kennel visits, climbed on glaciers, kayaked, hiked, and spent every minute seeing and doing everything I possibly could. I have supported the Alaska Zoo, Botanical Gardens, AWCC, Musk Ox Farms, Reindeer Farms, Alaska Moose Mamas and so much more. In addition to rental cars every trip, I was eating in local restaurants and supporting local businesses everywhere I visited. There isn't a single trip I didn't spend hundreds on souvenirs for family members and friends.

I am part of a private Bears of Brooks Falls Facebook group. While there are many different FB groups, the group I am in is strictly for those that closely follow the Brooks Bears. While there are thousands of members that are part of the group, there are hundreds of us that visit Brooks regularly, some of us semi-annually. The 60-100 people I am referring to are as upset regarding this issue as I am.

I have never spent less than \$5,000 on a trip and have even spent more than \$10,000 on a few of the longer trips. All in all, I have spent more than \$125,00 in Alaska supporting Alaska tourism and local businesses since April of 2013. The last trip to Brooks was more than disappointing. Many bears, including young ones, that were previously seen annually



did not return. Seeing the number of bear pelts at Fur Rondy originating from AF&G leads me to believe many were from the cull and there will be more in the future. I can only imagine some of those pelts may have been Brooks bears pelts. The very bears that draw so much attention and tourism dollars to Alaska.

The bottom line is, I can no longer support the senseless (in my opinion) decisions made by very few that greatly affect the entire reason I visit Alaska regularly and chose to spend my money there. I have already cancelled my July trip and am going to the Galapagos instead. My September trip to Alaska will most likely be cancelled in favor of an alternate trip, as well. It is sad, really, as I was just starting to plan a trip to Nome & a separate walrus trip, both in 2026. Not anymore. It really appears that many have no idea how much this gruesome act of ariel predator eradication for NO GOOD REASON will impact the tourism dollars coming to your state. Others I have spoken with have cancelled their upcoming trips. Maybe no one cares. It appears that way looking at the lack of opposition. Sad! Very Sad!

Sincerely,

Theresa Bielawski

Former Frequent Alaska Visitor



PC128

Name: Biller, Jenny

Community of Residence: Eagle River

Comment:

Please save the bears!



PC129

Name: Billings, Lisa

Community of Residence: USA

Comment:

This is nonsense. There is no such thing as humans “taking” any animals in a way that “benefits the herd”. It’s cruel, unnecessary and a hand out to blood thirsty humans with nothing better to do. Use common sense and science, not the whims of a few uneducated idiots.



PC130

Name: Billock, Ginny

Community of Residence: California

Comment:

For the life of me, I don’t understand how you can gun down an innocent creature for no reason. We need all of our wildlife to keep our eco system in check. Can you even imagine the pain that occurs on the animals!!!! They are all gods creatures and WE ARE CERTAINLY NOT GOD!!!! Let Mother Nature take care of our creatures; our place is NOT to intervene.



PC131

Name: Birndorf, Jessica

Community of Residence: Y

Comment:

Save the Bears



PC132

Name: Bischoff, Ronda

Community of Residence: Indiana

Comment:

Please stop killing these beautiful creatures unnecessarily



PC133

Name: Bisesi , Mary

Community of Residence: Pennsylvania

Comment:

To: Alaska Department of Fish & Game Commissioner Douglas Vincent-Lang

I am writing to urge you to reject the latest plan from the Alaska Department of Fish & Game which would authorize aerial gunning down of wolves, brown bears, and black bears across a 40,000 square mile area!! This area is bordered by the the YUKON DELTA NATIONAL WILDLIFE REFUGE, TOGIAK NATIONAL WILDLIFE REFUGE, KATMAI NATIONAL PARK AND LAKE CLARK NATIONAL PRESERVE!!

This operation is inhumane and unethical, causing unnecessary suffering to the bears and represents a upsetting approach to wildlife management. It also lacks a scientific basis as study after study shows that predators are not the major factor affecting the population of moose, caribou, and other game animals. ADFG is sidestepping the fact that such action will disrupt ecosystems for the obvious purpose of sport killing vs scientific foundations.

The practice is not only seen as unethical and inhumane but seen as damaging Alaska's reputation as a responsible steward of its natural resources and will most certainly if enacted, filter down to boycotting Alaska's economy because of this obvious uneducated attack on apex predators.

In addition, the killing of older, experienced bears can lead to the loss of vital survival knowledge for younger bears. If you proceed with this egregious act, it is a stamp of approval that your commission does not care about the viability of the targeted species.

A similar Alaskan predator control operation in 2023 killed approximately 100 brown bears (including cubs) and black bears, far more than the original planners estimated. This suggests that the Department cannot control the true mortality levels during these operations.

I strongly urge you to reconsider this senseless plan and prioritize a more balanced, humane approach to wildlife management which we the people expect of those placed in vital positions such as yours.

Sincerely,

Mary Bisesi



June 25, 2025

Members of the Board of Game,

I am writing these comments in strong opposition to Proposal 1 for Intensive Management of the Mulchatna Caribou Herd. I am opposed to this proposal because the Alaska Department of Fish and Game's (the "Department") own scientific studies do not support the continued predator control of bears and wolves in the range of the Mulchatna Caribou Herd.

On January 21, 2022, Nick Demma and Renae Sattler, two of the Department's own expert wildlife biologists who had been studying the Mulchatna Caribou Herd for ten years and a year-and-a-half, respectively, presented scientific studies to you, the Members of the Board of Game. Nick Demma had been studying the impact of wolf predation on the Mulchatna Caribou Herd for ten years -- from about 2012 to 2021. From his research, Nick Demma concluded that wolves were not a primary factor in the decline and failure to rebound of the Mulchatna Caribou Herd. Indeed, Nick Demma found a negative correlation between the number of wolves killed and the decline of the Mulchatna Caribou Herd meaning that the more wolves that were killed, the more the herd declined. Renae Sattler had been studying the condition of female members of the Mulchatna Caribou Herd affecting their ability to reproduce and recruit newborn caribou as members of the herd. Renae Sattler concluded that predators are not a primary factor in the mortality of adult members of the Mulchatna Caribou Herd. Instead, she concluded that illegal hunting, nutritional stress, brucellosis, and wounding events are the primary factors affecting the Mulchatna Caribou Herd's decline and failure to rebound.

More recently, I understand that, in an attempt to controvert Renae Sattler's research, Dr. Kristin Denryter and John Crouse have been continuing to study the condition of female members of the Mulchatna Caribou Herd and their ability to reproduce and recruit new members to the herd. As part of this research, Denryter and Crouse discovered that, by weighing an unknown number of female caribou in the winter instead of the fall, the female caribou weighed more in the winter than in the fall. The weight of a female caribou affects that caribou's ability to birth a healthy calf which is more likely to survive to adulthood and join the Mulchatna Caribou Herd. From this scant research, Denryter and Crouse determined that, because female caribou weighed more in the winter than in the fall, predation must be the primary cause of the Mulchatna Caribou Herd's failure to recruit more calves to the herd. However, it is impossible for Denryter and Crouse to reconcile this conclusion with an October 2024 by Todd Rinaldi and John Landsiedel's presentation which is part of your meeting materials.

The October 2024 report by Todd Rinaldi, which was based on studying the condition of calves after removing all the predators in a specific area after the predator control operation in the Spring of 2024, was the most in-depth study of the Mulchatna



Caribou Herd's calves thus far. What Todd Rinaldi found was alarming. Because the Department had shot and killed all the bears and wolves in the Western calving ground of the Mulchatna Caribou Herd, they were able to go in and assess the health of the calves. They found 44 calf mortalities. "Twenty of those calves (69%) died from starvation or dehydration with 7 of those mortalities presumed to indicate a failure to thrive rather than abandonment because the cow was observed with the calf." Further, "[a]ll calves submitted for necropsy had been born alive and stood **but had little to no fat.**" The report stated that the calves lacked trace minerals including Cu, Zn, and Se and little to no internal body fat. This information is indicative that the Mulchatna Caribou Herd is suffering from significant nutritional stress and that, no matter how many bears and wolves the Department kills, the Mulchatna Caribou Herd is not going to measurably increase in size. In conclusion, the report states that "the necropsy results paired with the continued active spread of brucellosis being documented in other monitoring and relatively low body fat measured in cows, indicate that nutrition and disease may also be affecting MCH growth." Of all the calves that were radio-marked or collected from this area after predator control had been conducted, which represented the most in-depth study of the Mulchatna Caribou Herd's calves to date, over 50% died from causes other than predation and most of the calves died from starvation, dehydration, and lacking trace minerals in their systems. This indicates that the Mulchatna Caribou Herd is suffering from significant nutritional stress and that no matter how many predators the Department kills, the Mulchatna Caribou Herd will continue to experience significant nutritional stress and disease. This October 2024 report is attached to these comments and the relevant information can be found on page 8.

This information is confirmed in slide 21 of John Landsiedel's presentation which shows that, in 2024, non-predation caused significantly more calf mortalities than predation. Denryter and Crouse's preliminary conclusion that, because female members of the Mulchatna Caribou Herd were gaining more weight in the winter, predation must be the primary cause of calf mortality, is completely contradicted by Todd Rinaldi's October 2024 report and Slide 21 of John Landsiedel's presentation, both of which demonstrate that over 50% of calf mortalities were caused by starvation, dehydration, having little to no body fat, and lacking essential trace minerals in their systems thereby indicating that female members of the Mulchatna Caribou Herd are not gaining sufficient weight during the winter and are not ingesting the necessary nutrients to give birth to healthy calves that can survive to adulthood and be recruited as members of the Mulchatna Caribou Herd.

John Landsiedel's presentation does not provide clarity regarding the impact that wolves have on the Mulchatna Caribou Herd's decline and failure to rebound. As stated above, Nick Demma, one of the Department's own expert wildlife biologists, studied the impact of wolves on the Mulchatna Caribou Herd for ten years and concluded that wolves are not a primary factor in herd's the decline and failure to rebound. Slide 20 of John Landsiedel's presentation confirms this because, except for 2017, wolves were responsible for only a very small percentage of predation on calves. Moreover, the number of wolves killed by the Department in the past three springs demonstrates that very few wolves are



predating on calves of the Mulchatna Caribou Herd. Yet in Slide 22, John Landsiedel attempts to hide this fact by combining "Bear and Wolf Predation" together in red. Yet even by doing this, John Landsiedel can't disguise the fact that, in 2024, predation by both bears and wolves on calves of the Mulchatna Caribou Herd was responsible for only a very small percentage of calf mortality.

As Members of the Board of Game and officials of the State of Alaska, you are bound by provisions of Article VIII of the Alaska Constitution which imposes public trust-like and fiduciary duties on you when you make decisions relating to wildlife. You are required to consider the interests of all Alaskans, including Alaskans who do not hunt members of the Mulchatna Caribou Herd, the many Alaskans who have spoken out against this predator control program targeting bears and wolves, and the current and future generations of Alaskans who may want to view bears and wolves in the wild. In addition, you are bound by the Intensive Management Statute which provides, in part, that predator control should not be conducted if such predator control is "ineffective, based on scientific information." Alaska Statute 16.05.255(f)(1)(A). The current scientific information before you, and which has been presented to you in the past, concludes that significant nutritional stress, illegal hunting, brucellosis, and wounding events are more prevalent causes of calf and adult mortalities of the Mulchatna Caribou Herd than is predation by bears and wolves. It is an abuse of discretion for an agency, such as this Board, to ignore rather than utilize the advice of your own experts. The overwhelming scientific research conducted by the Department's own expert wildlife biologists demonstrates that more than 50% of the calves of the Mulchatna Caribou Herd are dying due to starvation, dehydration, having little to no body fat, and lacking essential trace minerals and not due to predation by bears and wolves.

Based on the foregoing, if you approve Proposal 1, you will be violating the Alaska Constitution and Alaska statutory and case law which requires you to adhere to science, to not ignore the scientific analysis of the Department's own experts, and to make decisions relating to wildlife for the benefit of all Alaskans. Moreover, you should realize that the Commissioner of the Department (the "Commissioner") is violating 5 AAC 92.111(c) by continuing to authorize the predator control of wolves because 5 AAC 92.111(c)(6)(B) & (C) state that "the commissioner will review, modify, or suspend program activities if, after three years, the harvest of wolves is not sufficient to make progress towards the IM population objectives for wolves" and "if, after three years, there is no detectable increase in the total number of caribou in the control area." Predator control of wolves has been occurring since 2012 yet the Commissioner has not suspended such predator control even though his own expert wildlife biologist, Nick Demma, advised him that wolves were not a primary factor in the Mulchatna Caribou Herd's decline and failure to rebound. The Commissioner is violating 5 AAC 92.111(c) by continuing predator control of bears because 5 AAC 92.111(c)(6)(E) states that "the commissioner will review, modify, or suspend program activities if, after three years, any measure consistent with significant levels of nutritional stress in the caribou population are identified." The October 2024 report attached to these comments and Slide 21 of John Landsiedel's presentation show that the



majority of calf mortalities are due to starvation, dehydration, being born with little to no body fat, and lacking essential trace minerals and not predation by bears.

Michelle Bittner
Anchorage



MEMORANDUM

TO: Tim Peltier, Regional Supervisor

FROM: Todd Rinaldi, Regional Management Coordinator

DATE: October 2024

SUBJECT: 2024 Spring MCH Intensive Management Activities

Introduction

In 2022, the Board of Game directed the Division of Wildlife Conservation to conduct predation control activities to benefit the Mulchatna Caribou Herd (MCH) as a component of Intensive Management (IM) of Caribou (*Rangifer tarandus*) in Game Management Units (Unit) 9B, 17, 18, 19A, and 19B. The predator control objective is to eliminate all wolves and bears from the western segment of the Mulchatna Caribou Herd (MCH) calving area and does not specify numerical reduction goals. The calving area consists of a small portion of the affected Units, which have robust predator populations that ensures the removals will be sustainable at the Unit level. Department staff conducted a second year of lethal predator removal of bears and wolves, the primary predators of MCH neonate calves within Units 17B, 18, and 19B (ADFG 2023). The 2024 removal occurred over 2 periods with a broadened search area during the first period of 11–14 April (5,955 km²; Figure 1) and the principal period of 10 May–5 June 2024 (853 km²; Figure 1). In addition, radio collars were put on neonate calves to assess calf survival.

The western MCH segment (WMCH) has historically initiated an eastbound spring migration around 10 May. Between 2013 and 2022, WMCH migrated from wintering grounds in the eastern portion of Unit 18 near the Eek Mountains to calving grounds in the Tikchik Basin in western Unit 17B. A major shift in migration occurred in 2023 when WMCH calved in the upper Kisaralik River drainage in eastern Unit 18. This year, WMCH initiated their eastward migration in early May and calved again in the Kisaralik River drainage arriving on state land around 8 May.

The 2 periods of predator control were scheduled for optimal detection of target predators or to coincide with historic peak caribou calving dates. The April period focused on wolves while adequate tracking conditions existed to reduce adult mortality from wolves during migration from WMCH winter range to the likely calving grounds as well as to reduce predation on newborn

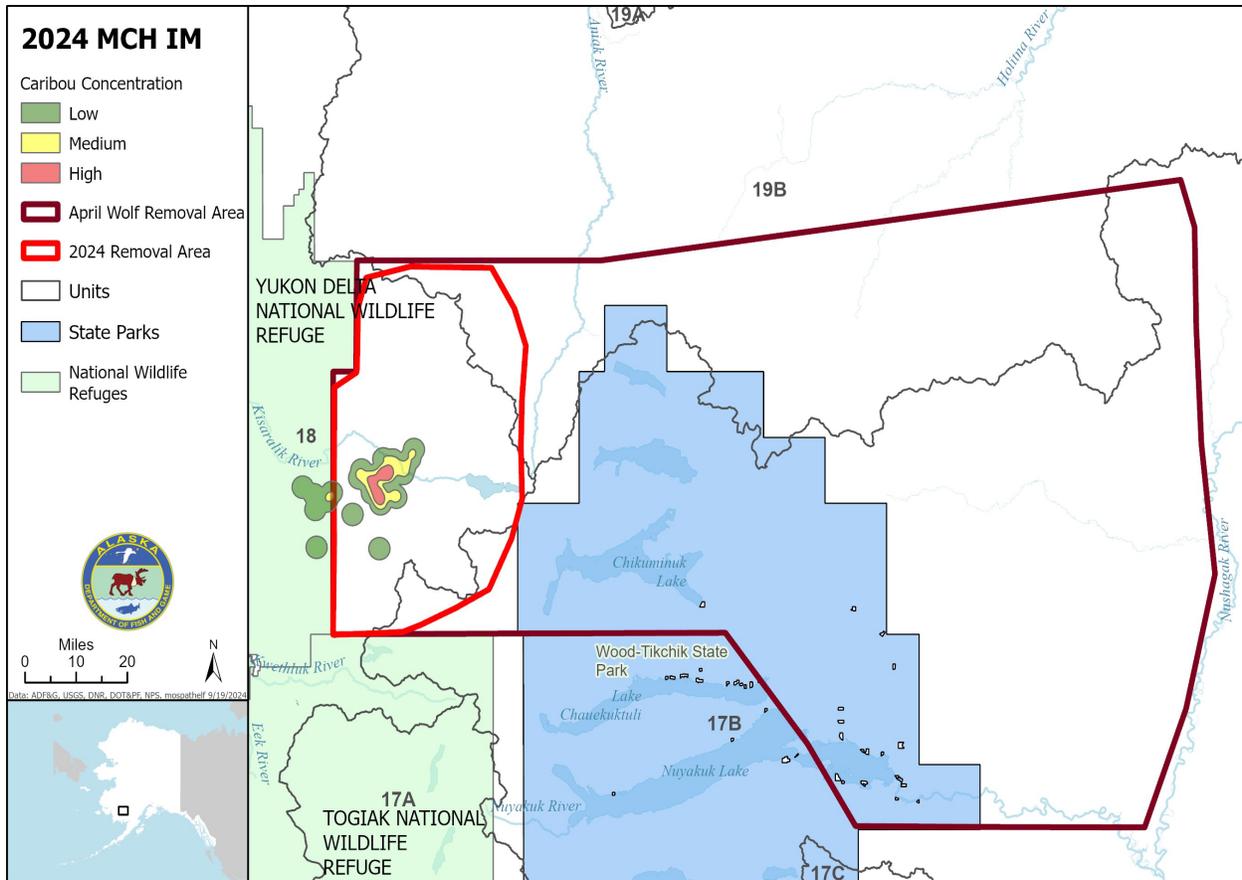


Figure 1. Location of predator removal program to benefit the Mulchatna caribou herd (MCH) showing the west calving area, and distribution of 35 GPS radiomarked MCH adult females, spring 2024.

calves. The April search area encompassed both the current and recent calving grounds. The search area during the May period encompassed WMCH calving grounds and focused on lethally removing all bears to increase calf survival when calves are most vulnerable. The May period was to precede peak parturition which historically has been 17–18 May (ADF&G unpublished data) and continue for 2 weeks thereafter. The WMCH predator control efforts are intended to increase calf survival to support population growth by reducing predation of newborn calves.

Methods

April

Each day three aircraft (R44 helicopter, C185, and PA-18 Super Cub fixed-wings) searched for wolf tracks, kills, or wolves in a 9,582 km² area. The search area was expanded from the primary effort of 2023 due to large home ranges, the great distance wolves may travel in search of food, and the potential to encounter dispersing wolves. Historic pack locations and den sites were used to estimate high-use areas. Wolves were primarily located by fixed-wing aircraft and locations were relayed to the helicopter, while another fixed-wing followed additional individuals from a



pack. Two department staff were on board the helicopter. Upon completion of wolf removal, all wolves were fitted with CITES¹ locking tags and brought to a single location where they remained until they could be transferred for further processing.

May–June

Each day fixed-wing aircraft (C185 and Maule M7) departed ahead of the helicopter to search for predators and neonatal calves to capture. Calves were opportunistically captured to reduce bias on size, perceived strength, and/or sex. Pursuit and handling times <20 seconds. Scent control was addressed by wearing Tyvek suits and fresh rubber gloves, and no bears were handled or transported in the helicopter prior to handling calves that day. Collars were stored in gallon Zip-loc bags with aromatic vegetation from the area. Calves were captured by hand, sexed, and fitted with a radio collar. Calves were monitored daily by a fixed-wing pilot for mortality signals. Within the helicopter, one person was designated for calf capture, and the other for predator removal. In situations where predators were detected prior to calf capture operations, the predator was removed, and one department staff member began processing the bear while the second department employee proceeded to capture calves. When target predators were located, calf captures ceased, and the helicopter was called in to the location to remove bears or wolves. After the target individual was killed, the field crew salvaged the hide and removed the skull for sealing. Locking seals (CITES) were attached to bear hides and skulls in the field and identification number, species, sex, age, and location (including unit) were recorded. When possible, a tooth from independent bears was collected for aging, and Nobuto blood strips were collected for *Brucella* exposure monitoring. No bear meat was salvaged due to lack of interest from surrounding communities. Wolf hides were not salvaged in May or June due to poor hide quality from wolves rubbing their winter coats and one instance of lice infestation. If staff opportunistically encountered a calf carcass that was not apparently the result of predation, it was collected whole, bagged, and either set or buried in snow to remain cool until it could be transferred to a fixed-wing aircraft. Details recorded for each calf carcass included age and sex, location, date of retrieval, estimated date of death, and physical condition.

Multiple, small tundra ridges provided areas for fixed-wing aircraft to land, refuel, and load bear hides, skulls, and calf carcasses. Fuel drums were flown to the cache site with a small battery, portable pump, and spill-containment bib. Additional fuel bags were left at the site to aid with fuel loading and unloading. One primary site was used, but at least 2 other landing strips were available which increased flexibility and safety due to variable winds and runway direction.

¹ Convention on International Trade in Endangered Species (CITES)



Calf captures and radio-marking to be dispersed around peak parturition (i.e., 50–60% of the collars deployed at peak parturition). Minimal new calf detections and low mortality detections (presumably from a high removal rate of predators) limited turnover of calf collars and did not allow for large-scale calf capture during 21–30 May. Weekly telemetry flights will be continued to monitor survival to 2 months. After calves reach 2 months of age, monthly telemetry flights will be conducted through August.

Hides were shipped as often as possible to Anchorage and received by ADF&G Region IV staff from Palmer. Hides were distributed to taxidermists on the road system for fleshing and salting after quotes were received prior to the start date; these hides are stored in Region IV. Some wolf and bear skulls were retained for educational purposes, otherwise they were destroyed.

Permits, including special exemptions and commercial use for helicopter landings are required within Wood-Tikchik State Park (Park) and were received prior to any control activities taking place, although no removal activities occurred in the Park this year.

Results

A total of 95 predators (81 brown bears and 14 wolves) were removed between April and June 2024. Removal activities occurred on state lands in Units 17B, 18, and 19B.

April

Between 11 and 14 April, 11 wolves (6 female, 5 male) from 2 packs were removed from the southwestern portion of Unit 19B (Figure 1) across four days of effort in 2 river drainages. One pack of 5 was detected in the headwaters of the Aniak river (2 females, 3 males), a primary migratory route for WMCH. A pack of 6 wolves was also detected in the upper Kogrukluks watershed (4 females, 2 males). A subsequent conversation with a local guide who was guiding bear hunters in the Kogrukluks mentioned seeing 2 wolves after the April efforts. Two sets of tracks were lost in hardpack snow on the last day of this removal effort towards the King Salmon River (Unit 17B). The April period concluded early due to poor tracking conditions after 15 April.

May–June

Removal

Most of the WMCH was in the Crooked Creek drainage, at the border of state and federal lands for a week prior to the May start date but most caribou had moved to state managed lands by 8 May within the Kisaralik River drainage. The WMCH remained in Unit 18 for the duration of the program, but the search area did include small portions of the western sections of Units 17B and 19B.

Eighty-one bears (47 female, 34 males; Figure 2) and three wolves were removed (1 female, 2 males). No black bears were observed on the calving grounds during the 2024 operations. The



skull and hide from one brown bear were not recovered due to precipitous technical terrain and diminishing weather conditions. Fifty-six brown bear hides were salvaged of 63 total adults; 7 bears were not salvaged due to poor salvage value. Age results from tooth samples, and *Brucella* exposure detection in bears from Nobuto strips are pending at the time of this memo. None of the removed bears or wolves were marked (e.g., radio collar, lip tattoo, ear tag) or showed any evidence of being handled previously.

Control efforts occurred on 21 of the 27 scheduled days; 6 of those 21 days were shortened due to low ceilings, poor visibility, high winds, or precipitation. Poor weather precluded all efforts for the additional 6 days that were scheduled but not flown.

The eastern portion of Unit 18 has little to no canopy cover, aiding in predator detections. Mountainous terrain which comprises the bulk of the 2024 calving grounds retained snow later into the spring likely increasing detections with the ability to see fresh predator tracks. However, tracking conditions deteriorated earlier than in 2023.

On average 4 brown bears, independent of age-class, were removed per day (Figure 2); the daily average of independent bears ($n = 63$) removed was 3. The age-class distribution of brown bears consisted of 63 adults, 2 two-year-old cubs (2-YO), 11 one-year-old cubs (1-YO), and 5 cubs-of-year (COY; Figure 3). Individual bear ages will be available after cementum age tooth analysis is complete (Matson's Laboratory, Three Forks, MT). Hide removal averaged roughly one-half hour per bear using 2 staff for a total of 65 hours of staff time spent skinning.

During the 2023 IM effort there was a declining catch-per-day that was offset by 2 later days of high removals prior to the project end date, this declining catch-per-day was experienced again in 2024 when 2 days of high removals occurred just before the project ceased for the year. While effort was not consistent between days (e.g., calf collaring on some of the days and inconsistent weather constraints), this pattern suggests that either more bears immigrated to the search area, or local bears had later den emergence and thus only became detectable in the latter portion of the removal period or after the program end date. An increased number of maternal sows were detected and removed in the last week of the program in both years.

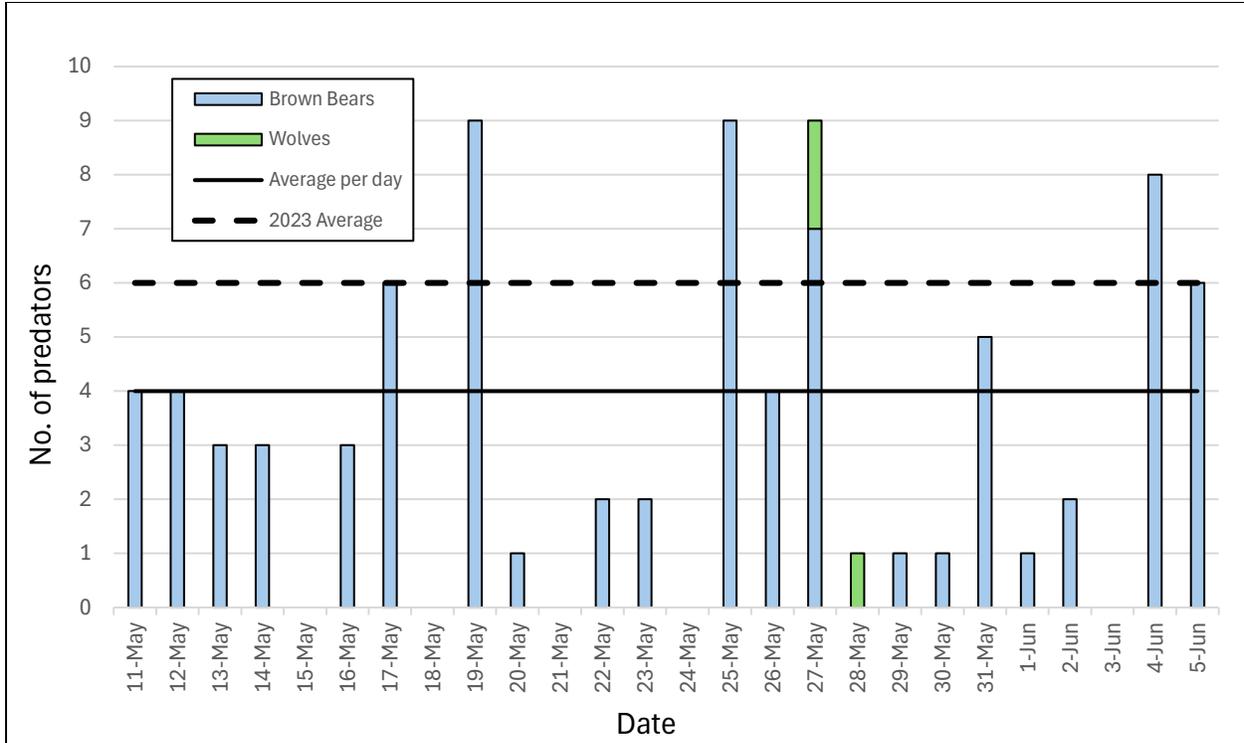


Figure 2. Total predators removed by date and average number of brown bears removed per day during the Mulchatna intensive management predator control program 2024.

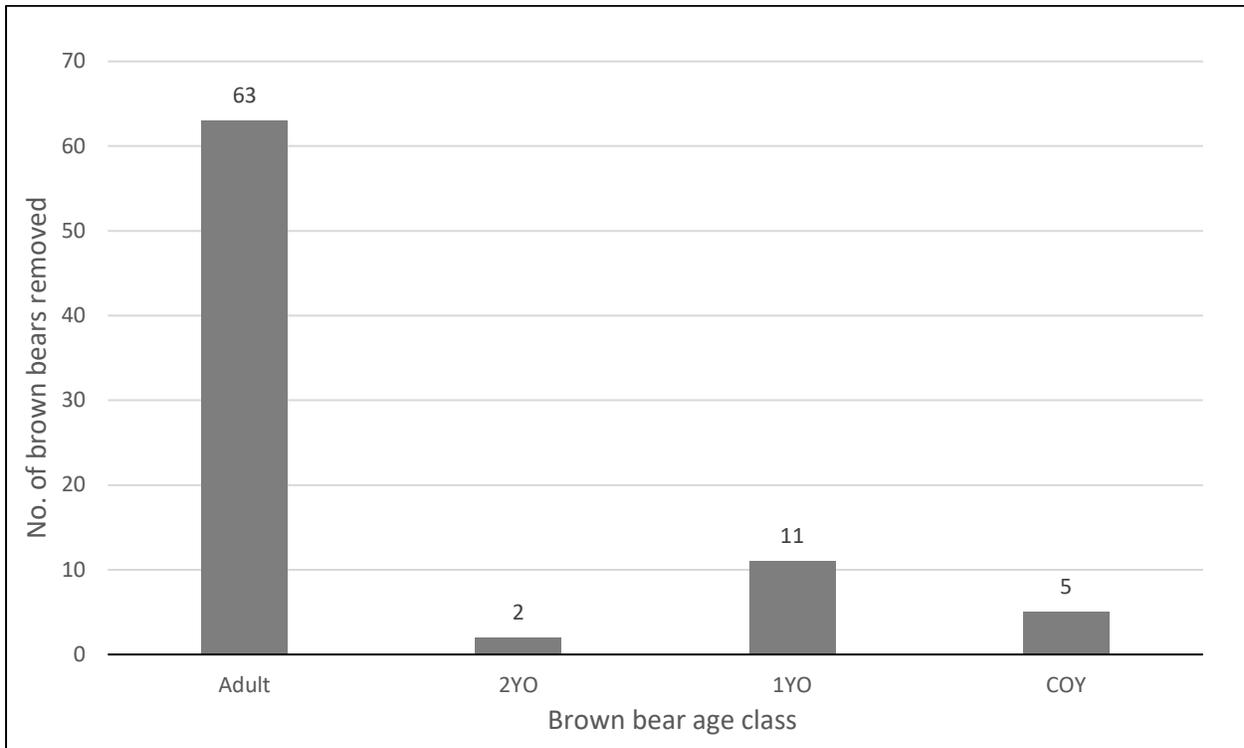


Figure 3. Brown bear age composition of removed brown bears during the Mulchatna Intensive Management predator reduction program 2024. No black bears were lethally removed in 2024.

During parturition flights, tracks of at least 3 wolves were observed in Unit 18 near the primary search area just prior to the IM program May removal period. All 3 wolves observed during the May period were removed from Unit 18 from 2 groups; 1 adult male and female on a fresh adult caribou carcass, and 1 juvenile male feeding on a removed brown bear carcass. The first male had extremely lice-infested fur and was in poor body condition as determined by both the pelvis and lumbar vertebrae apparent through the hide. The female showed no signs of reproduction (e.g., no swollen teats or vulva), and neither male had enlarged testes. The wolf den detected on the calving grounds in 2023 was monitored periodically and no wolf activity was observed in 2024.

Calves

Fifty-five calves were hand-captured and radio-marked (33 males, 19 females, 3 unknowns) in Unit 18 between 12 May and 1 June with over 70% (39 of 55) radio-marked prior to peak parturition, which was a departure from the intended methods (Figure 4). Sex was skewed towards males and three individual sexes were undetermined due to feces obscuring genitalia. Three collar signals were never detected after deployment (n = 52 radio-marked calves). One calf was determined to be ill at the time of capture but was marked specifically to test for disease postmortem. Twelve radio-marked calves (including the calf known to be ill at the time of capture) died of various causes from 11 May through 4 June (3 abandoned, 3 were predated [2 eagle and 1 bear], 1 failed to thrive, 1 drowned, 1 with a puncture wound to abdomen [possible antler], 3 unknown).

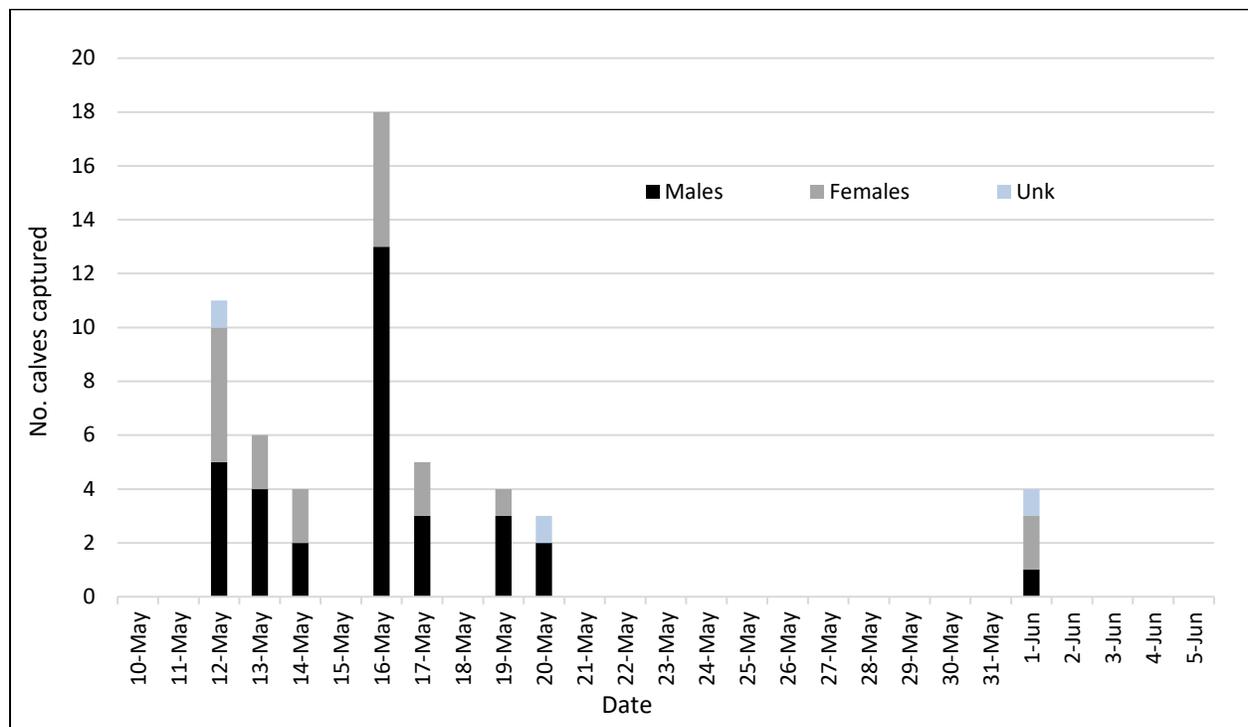


Figure 4. Total number of 2024 Western Mulchatna caribou herd (WMCH) neonate calf captures by date.

In addition to the 12 radio-marked calf mortalities, an additional 32 mortalities were found or observed opportunistically for a total of 44 identified calf mortalities detected. Of the 44 calf mortalities, 29 calf carcasses where cause of death was unclear were collected (7 radio-marked carcasses, 22 opportunistic carcass collections) and submitted for to veterinary pathologists for necropsy and diagnostic testing which included tests for *Brucella*. Twenty of those calves (69%) died from starvation and or dehydration with 7 of those mortalities presumed to indicate a failure to thrive rather than abandonments because the cow was observed with the calf. All calves submitted for necropsy had been born alive and stood but had little to no fat. All but 3 had bone marrow and a lymph node available to test for *Brucella* and were all negative and no gross lesions suggestive of brucellosis were noted. Additional respiratory pathogen testing on lung tissue was negative except that a viral pathogen, bovine coronavirus, was detected in 1 calf. Trace mineral analysis of livers showed consistent, low zinc concentrations in 33% of the calves (as well as low Cu, Zn, and Se in kidneys) in comparison to other caribou of the same age in other herds.

Calf survival to three-weeks of age included 47 of the 55 radio-marked calves. Probability of survival to each day decreased over time through 15 days of age (Figure 5). Prior Department research from 2012 – 2020 of MCH neonate survival concluded calf mortality was highest during the first two weeks of life. Predation has been documented as the leading cause of mortality of caribou calves in other systems, including the Porcupine Caribou herd (PCH) and the Denali Caribou herd (DCH) (Adams et al. 1995 , Whitten et al. 1992). Mortality was highest through 2 days of age in PCH and 8 days of age in DCH, which is similar to neonate mortality detected of WMCH in 2024.

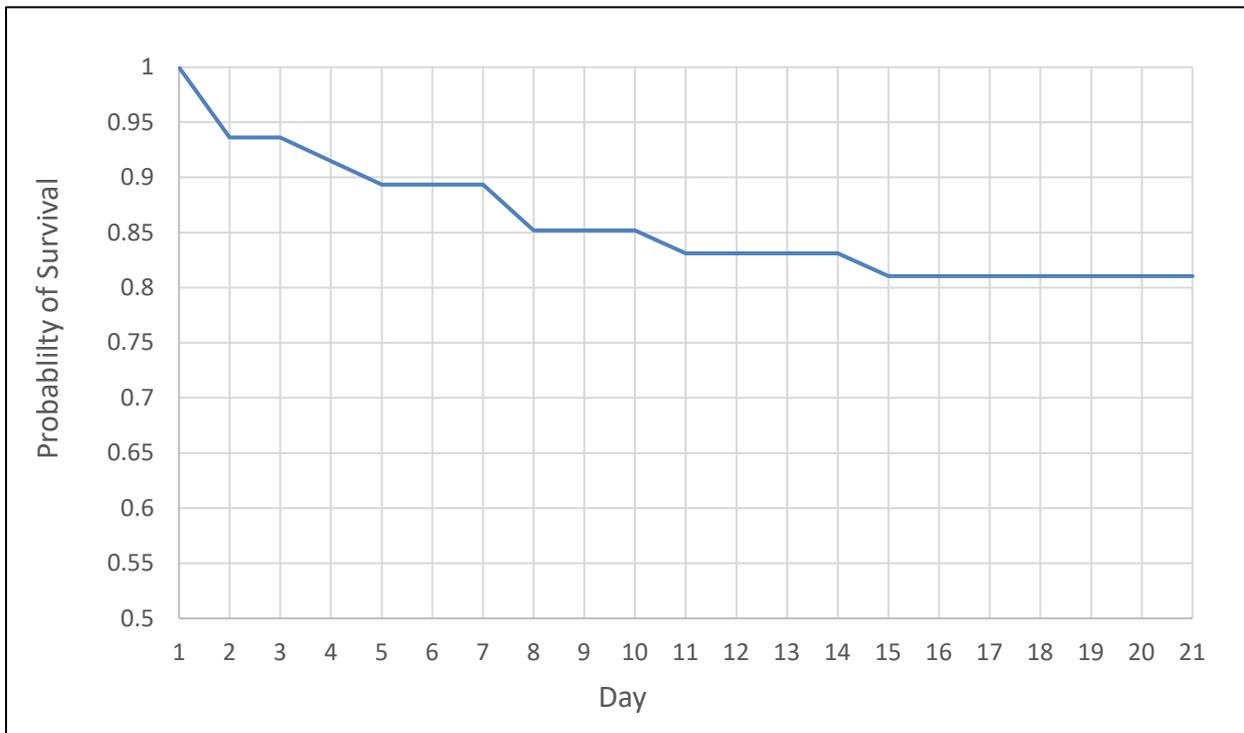


Figure 5. Probability of survival of each day to three-weeks of age (21 days) for 47 of 51 radio-marked WMCH neonate calves 2024.

Budget

Total operational costs for the removal operations and calf captures were \$507,743.65 of State of Alaska General Fund money. No federal money was used to complete operations. The primary increase in expenses relative to the 2023 program are due to increased number of adequate to good weather conditions which allowed for additional effort hours, an added wolf removal period, and calf collars and captures. Aircraft and fuel costs for the April removal period totaled \$54,530.50 and \$10,380.59, respectively (Table 1). The largest expenditure was aircraft time and fuel. One-time expenditures that will be of utility in the future include all freezers and field camp purchases. Starlink internet was required to monitor daily GPS fixes for adult caribou.

Table 1. Expenditures by category for the Mulchatna caribou herd intensive management predator reduction program.

Item	Quantity	Total
Fuel	7,577 gallons, \$10.50/gallon	\$79,650.00
Shipping (meat, hides)	12 shipments	\$1,037.36
Hide processing - April	11 wolf hides	\$3,100.00
Fixed-wing aircraft - April	2	\$27,653.50
Rotary-wing aircraft - April	1	\$26,877.00
Fixed-wing aircraft - May	2	\$197,854.50
Rotary-wing aircraft - May	1	\$125,109.00
Hide Processing	63 hides	\$6,725.00
Housing	30 nights	\$13,500.00
Field Camp	–	\$2,865.82
Disposable equipment	–	\$5,922.56
Chest freezers	1	\$699.00
Neonate expandable collar	30	\$14,226.90

*Not all invoices have been processed at the time of memo distribution (bear hides).

Discussion

The MCH Predator Control Program is designed to increase calf survival to aid population growth. Calf mortalities due to predation were observed within the first few days in both years of the program. The results of the 2023 removals indicate the department reduced predators on the west Mulchatna calving grounds, and an increase in calf survival was observed relative to prior estimates of calf survival (e.g., see Paragi and Landsiedel 2024). The observed increased calf survival with predator reductions indicates predation being a factor potentially limiting growth of the MCH, especially if the larger cohorts of surviving calves survive through the winter and recruit into the adult population. Other factors, including disease, nutrition, and winter severity, may also simultaneously be affecting the growth of the MCH.

Predator Reductions and Predator Population Sustainability

Due to the enigmatic and wide-ranging behavior of bears, they are notoriously difficult to enumerate, especially in repeatable objective measures of density (Brockman et al. 2020). With a desire to avoid delaying the initiation of bear removal; the Department did not have an opportunity to estimate brown bear densities within the IM areas prior to removals. As such, it is prudent to use estimates from the broader region in evaluating the removal effort. The removals need to be large on the relatively small scale of the calving grounds to reduce predation on neonates considerably, while simultaneously not putting the much broader bear population in jeopardy.

There are a few estimates of brown bear density for the approximate area and adjacent to the area of the MCH historic range (Table 2.; VanDaele 2001, Walsh et al. 2010, Walsh *unpublished data*). These estimates indicate that there are potentially between 2,000–7,000 brown bears in southwestern Alaska (units 17, 18, 19), which contains greater than 100,000 km² of mostly remote, intact habitat and wilderness. In 2024, 81 brown bears were removed from a 1,350 km² area that encompassed the MCH calving grounds, which is less than 1.5% of that total area.

Table 1. Brown bear density estimates on and adjacent to the May Mulchatna caribou herd (MCH) Intensive Management program.

Years	Author	Location	Densities
1993–1997 ^a	Van Daele, ADF&G	Killbuck Mountains, Unit 18	18.2 /1,000 km ²
2003–2004 ^b	Walsh, TNWR	TNWR, Units 17A & 18	40.4 /1,000 km ²
2016–2022 ^c	Walsh, TNWR	TNWR, Units 17A & 18	69.13/1,000 km ²

^a Mark-resight methodology.

^b Dual-observer, line-transect methodology.

^c Modified geospatial-population-estimator methodology, unpublished.

The goal of the project was to increase caribou calf survival by removing all bears and wolves from the calving grounds during the spring period when calves are highly susceptible to predation. Brown bears were the predominant predator on the calving grounds. Data does not exist to evaluate whether the goal was achieved, and subsequent calf monitoring efforts detected additional brown bears in the search area post removal. However, the small overall search area and anecdotal observations, such as evidence of the presence of bears (e.g., tracks, predated neonates) typically led to finding a bear, indicating a high degree of bear removal was achieved on the calving grounds. Regardless of the actual level of reduction, it appears to have been sufficient as predation on neonates was relatively low (e.g., see Landsiedel and Paragi 2024) and fall composition surveys² indicated increased calf survival. Comparing removal density to density estimates is not appropriate for several reasons, including that the caribou calving grounds are a



seasonal concentration area for bears within a small area while the density estimates have been done over a broader area when bears are more dispersed.

The 2024 removal effort occurred within a small fraction of units 17, 18, and 19 in southwestern Alaska (<1.5%) and removed less than 5% of the total brown bear population. The area surrounding the removal area contains substantial brown bear habitat with healthy populations (e.g., high bear densities in the TNWR; Table 2). The 2024 removals are sustainable at the broader scale of the southwest Alaska bear population and at the individual unit scale.

Calf survival

The Department predator removals are associated with enhanced calf survival through six months², which may result in herd growth if the calves are surviving through the winter. In October 2023, after the first year of predator control, staff observed a WMCH calf-to-cow ratio of 46:100—the highest ratio observed in 20 years of monitoring the eastern and western portions of the herd separately. This strongly suggests that the predator removal program was successful in increasing WMCH calf survival to six months.

During calf telemetry flights after removal efforts ceased, brown bears were observed pursuing caribou and within the vicinity of WMCH. However, it would be difficult to extend removal into this time period because WMCH dissipate their calving aggregations and transition into summer range, which is primarily in federal lands in mid-June.

Composition surveys to obtain a more precise calf-to-cow ratio are scheduled for October. These surveys will assess the efficacy of the program by evaluating calf survival to six months of life. The same surveys are completed for the East Mulchatna caribou herd (EMCH) which did not receive agency predator control and may serve as a comparison in post-calving abundance and fall age-sex composition.

Marked neonate calves from 2024 will be monitored monthly and a sample will be re-captured as short-yearlings during March of 2025 and affixed with radio collars appropriate for adult caribou. These known-age animals will be monitored annually to assess age at first reproduction and their true recruitment into the population. If calves survive overwinter and recruit into the adult population at a high rate, then that will be strong evidence that Department predator control effort is leading to an increased growth rate of the WMCH.

² John Landsiedel & Evelyn Lichwa, Area Wildlife Biologists, ADF&G, Dillingham, 2023 Fall MCH Composition Survey Memo, 25 October 2023.



Other Factors

While the increased early calf survival associated with Department predator control indicates that predation may be an important factor helping limit MCH growth, other factors, such as disease and nutrition, may also be affecting MCH growth. Many of the necropsies of calves from a subset of the mortalities found had little to no internal fat and nutritional (essential trace mineral) deficiencies, which may indicate the cow was nutritionally stressed or weakened by disease. Interpretation of these results to the WMCH as a whole is difficult, because not all mortalities were necropsied, scavenging was likely relatively low due to the 2 years of predation control, and the predator control effort resulted in very high search effort that is atypical for a calf mortality study. However, the necropsy results paired with continued active spread of brucellosis being documented in other monitoring and relatively low body fat measured in cows, indicate that nutrition and disease may also be affecting MCH growth.

Conducting predator control may still be prudent even when multiple factors (stressors) are simultaneously affecting the population. Having multiple factors simultaneously affecting a population is not unusual and if other stressors increase susceptibility to predation, or if the population is in a predator pit that it cannot break free of unaided, the role of predator control is likely more important. If it is the combination of factors together that forestalls population growth, then removing one of those factors may allow a population to switch to a positive growth rate. In the case of the MCH, multiple factors appear to be affecting the population. Decreasing the influence of predation on the MCH is one of the only tools available to the Department, especially as harvest has already been curtailed. Increased early calf survival and indications that the WMCH may be starting to grow are measures we would expect to see if the predator control effort was effective. However, we are in the early stages of studying the response of the caribou population to predator control and do not fully understand the long-term ramifications of predator removal and interactions with nutrition and disease, but those are currently being investigated.

Staff Operational and Monitoring Recommendations

Calf collaring took significant effort with at least 2 calf capture days being called off due to predator detections. Calf captures did not represent a net loss to predator search efforts; however, they did require daily time from the helicopter. With less time but the same intensity, helicopter searches for predators during calf captures were reduced to a smaller area. However, this search intensity is far greater than what is typically expended in calf mortality studies, so we located a disproportionate number of dead calves in the removal area. Fixed-wing pilots also searched for research caribou VIT (vaginal implant transmitters) expulsions to detect the birth of calves and their disposition (alive or dead). Again, this took effort away from high-intensity predator searching, but also allowed for monitoring calves that otherwise may have gone undetected. Some predators were found and removed while completing these other tasks, so it



is unclear how collecting additional data may have impacted the effectiveness of the program. Participating biologists recommend continuing calf collaring and monitoring efforts. Neonate VHF collars are inexpensive and with a large effort by dedicated staff it is not unreasonable to collar more than 50 calves over the course of the project. Frequency overlap may be an issue, so department biologists recommend using coded collars and receivers, allowing multiple animals to be on the same frequency.

The WMCH calved in nearly the same location as in 2023, giving staff and contractors a year of experience to draw upon. During the second-year, staff were able to spend more days afield, likely due to shifting the operating location from Dillingham to Bethel, which put the crew 40 miles closer to the calving grounds and removed mountainous terrain between the calving grounds and the base of operation. Modifications from the first year included shifting primary operations to Bethel; adding a third fixed-wing aircraft for staff, gear, hauling fuel, and EMCH calf monitoring; establishing fuel caches in the field, and having excess fuel available in Koliganek prior to the start date. The importance of fuel logistics during a remote project cannot be overstated. The fuel cache was replenished most days by excess fuel in a C185 belly tank and portable pump but was also aided by extra fuel bags carried at the beginning of the day and dropped off mid-morning. Occasionally, a sole fuel flight occurred to maintain a full fuel cache using the C185. Finding an adequate crosswind runway with additional fuel would provide an increased safety margin for both pilots and staff.

Skinning adult bears was very labor and time intensive. It is important to have 2 experienced staff who are willing, capable, and proficient both in shooting from the helicopter and skinning as it increases productivity and flexibility. The department also recommends increasing the number of days each staff member is participating. Lower turnover rates would increase efficiency and create reduced workloads for the pilot.

It is recommended to continue the efforts on WMCH calving grounds for a third year, including the additional wolf removal period in early to mid-April lasting 7–10 days. Although this would require the closure of the public permitted same-day-airborne (SDA) program, the Department has not received negative feedback from any permitted pilot for doing so in 2024. Due to the remote nature and lack of participation among most of the SDA permittees, department removal will be more success in the targeted area. Wolf removal is highly dependent on adequate snow and light conditions which are typically deteriorating by mid to late April. It can be reasonably expected that wolf removal would be more effective during that time frame due to the strong likelihood of increased snow cover. While tracking wolves in the upper Kogrukluuk, staff encountered 1 guided bear hunter and immediately left the area to avoid conflict and interruptions to their hunt.



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PC135

Name: Black , Carolyn

Community of Residence: California

Comment:

You have a legal and moral responsibility to protect bears in the Alaskan wilderness, and advocate for any aspect which destruction, which interferes with their ability to survive. Killing bears is not a valid form of wildlife management, it's murder!



PC136

Name: Blackburn, Joan

Community of Residence: Ohio

Comment:

Yo am opposed to the killing of brown bears in order to grow other animal populations. My husband visited Alaska and spoke of the majestic beauty in nature there. Please allow nature to be in charge as man tends to ruin things in nature.



PC137

Name: Blackwell, Stephen

Community of Residence: Anchor point, Alaska

Comment:

What the hell? Do not spend tax dollars for culling bears. The population is not out of hand. Do not kill any black, brown or polar bears. Do not kill bears.



PC138

Name: Blakey, Harry

Community of Residence: United Kingdom

Comment:

Mindless murder of bears does not solve issues. They are needed for the ecosystem. Shooting things isn't the answer for everything, believe it or not.



PC139

Name: Blaxter, Gigi

Community of Residence: Tennessee

Comment:

See attached

OPPOSED

I have read the information available on the proposed bear killings. I AM OPPOSED

to aieral or any killing of bears.

These lands are supposed to be set aside for the bears to live a natural, free, life as God and nature planned.

It is horrific to track down a beautiful, intelligent, empathetic, mother, youth, or any animal. The helicopter, airplane buzz alone is torture to these animals as it would be to you or me.

I suggest you spend time observing these magnificent, family loving animals (plenty of videos on wildlife sites) and see what you are cruelly destroying.

I believe in live and let live.

They have JUST AS MUCH RIGHT to live on this earth as you. Thanks for your time.



PC140

Name: Bloomfield, Kelsey

Community of Residence: Georgia

Comment:

Save the bears!



PC141

Name: Blount, Will

Community of Residence: Orange County

Comment:

Leave the wild life alone. They were here before us



PC142

Name: Body, Elaine

Community of Residence: Uk

Comment:

Please, no more killing.



PC143

Name: Bolding, Sherry

Community of Residence: Alabama

Comment:

I am totally against killing animals like these beautiful bears for no reason! It's absolutely cruel that someone would do this to!!!



PC144

Name: Bone, Maria

Community of Residence: 641 W Placita Campo de Adobes

Comment:

I am in opposition of the reckless and unnecessary killing of our beloved Alaskan bears. This barbaric act should have no place in 2025. I request that this program be abolished and that protections be placed to protect our wildlife not hinder its livelihood.



PC145

Name: Bordner, Deborah

Community of Residence: North Carolina USA

Comment:

Please do not allow this to happen. Attempted predator control does not work. Bears & wolves are keystone species & should be left alone.



PC146

Name: Borgen, Ena

Community of Residence: Seattle

Comment:

Stop the killing. This is disgraceful, disgusting and despicable to say the least. We need to do better for our fellow species and the planet. All living creatures are valuable.



PC147

Name: Borrero, Waldemar

Community of Residence: New York

Comment:

STOP SHOOTING BEARS NOW



PC148

Name: Boselli, Juliette **Affiliation:** Denali Mountain Works

Community of Residence: Denali

Comment:

I am opposed strongly to the gunning down of bears from helicopters in the Mulchatna area (or anywhere) . I operate a business that relies on Alaska having reputable wildlife management, people travel to Alaska to view wildlife and see an environment that supports wilderness habitat and wild animals. To have our state wildlife managers show no concern whatsoever for the very wildlife that attracts tourists to our state is a disgrace. Most Alaskans are disgusted by the gunning down of our wild bears. It is not based on sound science and has twice been found to be illegal and in bad faith. That this practice continues to be forced on our state and our residents is beyond understanding and does not serve the residents of Alaska or our wildlife as you are tasked to do. No to killing of the Mulchatna "Bears"



PC149

Name: Boswell, Rhonda

Community of Residence: Texas

Comment:

I am vehemently OPPOSED TO THE SLAUGHTER of these bears I am a visitor and lover of Alaska and its amazing wildlife. I've had the opportunity to encounter these bears, to photograph them, to share their space and admire their beauty. They are amazing creatures and should be protected, not slaughtered. Nature is to be revered and protected. Please... do not do this. We are losing more and more wildlife to progress and human encroachment. Let them live where they are and thrive. Prayers that you do the right thing.



PC150

Name: Bouker, Johanna

Community of Residence: Dillingham

Comment:

I am deeply opposed to the killing of the bears that you are proposing. I will be 85 years old this month having been born in Kanakanak (near Dillingham- to parents who came up here from the States in 1938.

Dad was a bush pilot, John Walatka. We lived summers at Lake Clark until 1952 when the airline he was with was selected to build some sports fishing camps in Katmai which he oversaw and built. I just came back from a week at Brooks. We only saw bears walking on the beach one day. Please let nature do its thing. If you want to save the hoofed animals then stop the sportsmen from killing them. I believe firmly that local people kill only what they need to live comfortably when they need it. Please leave the bears alone. They are waiting for the salmon right now, mostly eating grass according to the scat I observed at Brooks. I pray that you understand. Regards, Johanna (Walatka) Bouker in Dillingham

I am opposed to the bear killings as proposed by the Fish & Game. I was born in Dillingham on June 17, 1940. Have lived also in Anchorage, Homer, Fairbanks, and Platinum and spent the last 30+ years here in Dillingham. I spent the first 12 summers at our family cabin at Lake Clark and most the rest at Katmai at Brooks, Grosvenor, and Kulik. I just returned from my annual June 1-7 trip to Brooks. I earned my bachelor's degree in science from UAF by working at the Katmai camps in the summers. I think the bear killing program is inhumane and totally oppose it. Lets let nature be nature. Probably the best solution to the "problem" is sportsman hunting which I think should be banned.



PC151

Name: Boutier, Ella

Community of Residence: France

Comment:

Chaque espèce doit apprendre à cohabiter et pas triompher des autres espèces. C'est ça être humain, pas tuer et laisser agoniser des êtres, des mères et des bébés.



PC152

Name: Bowman, Christa

Community of Residence: PA

Comment:

This should NEVER be allowed. There is absolutely no sportsmanship from killing bears from a helicopter. It's just a massacre of our beautiful bears. This should NEVER be allowed.



PC153

Name: Bowman, Trina

Community of Residence: Canada

Comment:

No we should not kill our previous bears period .. save the bears



PC154

Name: Boxman , Naomi

Community of Residence: Rockville

Comment:

I oppose this bill as there is no scientific evidence that reducing the bear population will help caribou. Additionally, these bears are creatures of the earth that you are randomly killing! This bill should be opposed.



PC155

Name: Boyer, Jayne

Community of Residence: NC

Comment:

Reasons to Protect Alaska Brown Bears Instead of Hunting Them:

I support protecting brown bears in Alaska from hunting, particularly proposals involving aerial gunning for these reasons:

1. Ecological Importance:

Keystone Species: Brown bears are considered a keystone species in their Alaskan ecosystems.

Apex Predators: As apex predators, they influence prey populations and contribute to maintaining ecological balance.

Nutrient Cycling: Bears play a vital role in transferring nutrients from the ocean to land through their consumption of salmon, which then enriches the soil and supports vegetation growth. This ultimately benefits other species in the food chain.

Seed Dispersal: Brown bears contribute to plant diversity and health by dispersing seeds through their foraging.

2. Ethical and Moral Considerations:

Sentient Beings: Many people consider brown bears to be sentient beings with the capacity for suffering, making the act of hunting them ethically questionable, especially for trophy hunting or recreational purposes.

Cruelty Concerns: Arguments against aerial gunning specifically highlight concerns about the brutality and inhumane nature of the practice.

Respect for Wildlife: Protecting these magnificent animals demonstrates respect for nature and the complex web of life.

3. Economic Benefits of Tourism:

Bear Viewing Industry: Bear viewing tourism generates significant economic benefits in Alaska, supporting local businesses, creating jobs, and boosting regional income.

Sustainable alternative: Well-managed bear tourism can be a valuable and more sustainable economic option for communities compared to relying solely on hunting or resource extraction.

Conservation Funding: Revenue generated from ecotourism can be reinvested into conservation efforts, helping to protect bears and their habitats.

4. Questionable Effectiveness of Predator Control:

Limited Impact on Prey: Studies suggest that predator control, like the proposed aerial gunning, may not be the primary factor determining prey populations, such as moose or caribou.

Disruption of Ecosystems: Hunting bears can disrupt their social structures and negatively impact the wider ecosystem.

Potential for Increased Conflicts: Removing dominant individuals through hunting might even lead to an increase in conflicts between bears and humans.

5. Legal and Constitutional Challenges:

Unconstitutional Program: A court ruling in Alaska found that a brown bear killing program aimed at boosting caribou numbers was unconstitutional and violated provisions related to sustained yield and public trust.

In summary, protecting Alaska's brown bears supports ecological health, offers a more ethical approach to wildlife management, provides economic opportunities through tourism, and aligns with current legal and public sentiment regarding such practices.

Name: Boyer, Tracy

Community of Residence: Juneau

Comment:

Killing bears is a horrible idea. Doing so by airplane is barbaric. Alaska is famous for our bears and tourists spend huge \$\$\$ to come see them. Don't kill the golden goose that brings in big bucks to Alaska



PC156

Name: Boykin, Kayla

Community of Residence: Anchorage

Comment:

I oppose the bear kill. The problem that is facing the Caribou is environmental and the result of climate change. Killing bears is not backed by scientific research and is not the way to solve this problem.



PC157



PC158

Name: Bradley, Wendy **Affiliation:** Bradley family

Community of Residence: UK

Comment:

Animals regulate themselves if left to it, human bloodlust is the only reason these actions are being taken.
Would be tourists - won't be coming now.



PC159

Name: Brandon, Victoria

Community of Residence: Los Angeles

Comment:

The bears have every right to live with their family in peace. Why would humans jump into a helicopter and murder them? This makes no sense. I have been to beautiful Alaska. I can't imagine anyone who lives there would want to destroy the wildlife- and certainly not bears!



PC160

Name: Brandt, Carolyn

Community of Residence: Vermont

Comment:

June 23, 2025

To Whom It May Concern,

In Opposition

I am writing you today asking that more attention be paid to stop the predator control program targeting bears and wolves in Alaska.

There is scientific studies that have shown that the decline in the Caribou herd is a combination of:

*Climate change

*2024/2025 (and prior) has shown an incredible variable of weather temperatures. With temperatures climbing four times faster in the Arctic than the rest of the planet, snow and cold temperatures are coming later and later in the year. Snow patterns and vegetation are changing as well, both of which can impact caribou.

* Warmer winters lead to more rain-on-snow events, which create layers of ice that caribou must dig through to reach food – as well as;

*Temperatures near freezing cause snow to melt and then freeze again, creating layers of ice that caribou must dig through.

* Woody plants are replacing tundra plants that caribou eat. These woody plants are less nutritious for caribou.

*Caribou avoid burnt-out areas because forest fires damage lichens. Fires are increasing...

Other factors that may be contributing to caribou declines include: Overgrazing, Trampling, Development that fragments habitat, and Oil development.

*Hunting

*Bag limit for state residents is 15 caribou... really?! 15 caribou for one hunter! Perhaps if this were to be lessened, they may have a chance to increase the herd.

*Illegal hunting just adding to the numbers.

From what they have been able to determine, predation, natural mortality due to weather, hunter harvest, and other causes are all factors in deaths.

These studies do not include bears nor wolves as a major part of that decline. While it is a natural occurrence that predators will take an animal for substance, it is also known that ill underfed animals will be taken first. Perhaps if the Caribou had a better feeding area with natural foods to sustain them they would have better survival rates. Planting such plants would be a start – before killing in such barbaric ways...

I am a viewer of Explore.org and watch the Katmai Bear Cameras live daily. Their motto is never stop learning. Learning about the wildlife we are a part of in this world. Therefore, thru learning about our wildlife... changes our views of animals forever... thus we learn to do better for them. Watching these cameras show we are not as different in our lives as they. I make donations to keep this magical place alive. I also donate to The National Park Service. It is a dream of mine to visit one day. Many of our viewers do come. Therefore, increasing the economy for the local area and its people.

Watching daily, the bears show us their strength for survival. They teach us of their lives, their families. They show us the need for empathy for their survival... before extinction. We as a community have taken notice of the loss of many of the mainstay bears that would frequent the park. The numbers are declining. I am very concerned that this policy for your predator control has created this. With approximately 200 bears taken and 20 wolves there has been no change in the Caribou herd. But we do see the loss of bears. Soon we will see the loss of human visitation.

Please advertise viewing of the live wildlife. Please rethink this horrific means of a control policy. Please listen to the science. Please listen to your people. Please stop the killing. Please protect our wildlife and our earth.

Sincerely,

Carolyn Brandt



Moretown, VT 05660



PC161

Name: Branson, Peter

Community of Residence: Wrangell

Comment:

I'm a guide to a popular bear viewing site near Wrangell called Anan bear observatory. Bear viewing generates jobs and contributes greatly to the economy. The bear viewing on the katmai dwarfs what Anan generates. It looks to me like katmai bears are being killed for a caribou herd that is likely declining more due to climate changes to vegetation more conducive to moose, which are frankly a better subsistence animal. This misguided and outdated predator control program is bad science and bad PR for Alaskan tourism.



PC162

Name: Breinholt, Michelle

Community of Residence: Willow, AK

Comment:

I absolutely do not support the culling of the Malchatna Bears. Ever since moving to this state six years ago I am continually shocked by the lack of consideration for wildlife and their habitats. I was always under the impression that the Alaska wilderness was precious and important enough to keep safe and that people cared enough to protect it from going the way of most places in the lower 48. I was wrong. The lengths that the Alaska BOG and ADFG will go to in order to kill bears and wolves from the air is astonishing and just plain cruel. As I watch busloads of tourists passing my home along the Parks Hwy. I shake my head. If they only knew how this state treats the iconic animals they all come to see, they would take their gobs of money and go home. A coffee hut worker nearby told me the tourists always ask "Where are the bears?" Dead. They are mostly dead whenever it suits those in power.



PC163

Name: Brinkworth, Deborah

Community of Residence: Maine

Comment:

I urge you to close down the aerial hunting of bears in Alaskathese bears are already threatened by habitat loss, climate change, and it's only going to get worse as our planet continues to warm. These bears are keystone species and they play a vital role in maintaining the ecosystem balance.

These bears play a vital role in the ecosystems they live in, and when we protect them, we protect the balance of nature in those ecosystems.

Katmai as well as other nationally and state protected places bring in enormous amounts of money to be used in conservation and to bring tourism to your state. Please stop Ariel killing.

Additionally, there is absolutely no scientific evidence that the bears are decimating Caribou populations. If you leave the wild alone, they control themselves. Please stop the aerial killing.

If you want to bring more money to your state, and if you feel the need to spend money concerning the wild bears, put together an informational program or courses, teaching people how to responsibly view the bears. Teach people about our resources, and the actual environmental impacts, especially with the change in climate for the entire ecosystem you say you are protecting. Please stop the aerial hunting of bears.

Please do not move forward with the aerial hunting of bears. There is no evidence that the reasons behind your statements and desires are true. In fact, Yellowstone is a perfect example of how both Apex predators and keystone species all work together to create a healthy and natural environment.

Please stop the aerial hunting of bears.



PC164

Name: Brito, Pamela

Community of Residence: APT 101

Comment:

Bears deserve live.



PC165

Name: Bromley, Michael

Community of Residence: Westchester, NY

Comment:

I strongly support all protection efforts for the Mulchatna bears. In particular, hunting bear from helicopters is a barbaric practice - not worthy of our country and society. I belong to multiple large travel groups, am influential in their decisions, and would definitely propose canceling any future activities that would support Alaska's economy if this passed.



PC166

Name: Brooks, Brooks

Community of Residence: Washington State

Comment:

In opposition to this current crime of eradicating bears in Alaska, I am speaking as a former resident of Alaska, New Mexico, Nevada and Oklahoma. Bears, wolves, wild horses, etc...are all natives of the land and their populations have ebbed and flowed throughout time without the manipulation of government agencies pretending to "manage" them into extinction.

Human land use/hoarders has/have been more destructive to habitats and all of the living plants and animals within them (including other humans) than any one species throughout history. This is the moment to change the course of history.



PC167

Name: Brooks, Nathan

Community of Residence: PA

Comment:

Do not shoot the bears. Leave nature alone. Haven't we learned anything from man trying to play God? Maybe research Yellowstone and the wolves. You might as well try to hold water by squeezing it. Squeeze a little harder it might work.



PC168

Name: Browder, Karen Browder

Community of Residence: Austin , Texas

Comment:

Alaska is Gods country and you have decided that you know better in who lives and who dies ? Bears have a job to keep the populations in check with deer, elk and caribou. The animals are what brings tourists to your state. Bear killing will have social media will kill any tourist growth .



PC169

Name: Browder, Rachel

Community of Residence: Livingston

Comment:

Bears are why we visit Alaska. There is no proof killing these bears will help other populations. Plus killing is murder. Do you really want that on your hands, and a bunch of angry people. Tread carefully the world is watching!!



PC170

Name: Brown, Kellie

Community of Residence: United Kingdom

Comment:

The killing of bears and constant interfering in nature and wildlife is absolutely disgraceful and must stop. As an example, in the United Kingdom we eliminated our apex predators which has led to population

explosion in deer which now in turn is culled by humans as means of population control. When humans intervene in the natural order of things it never works out well for the animals. What you are proposing is barbaric and unnecessary. Myself and my family have been talking about visiting Canada next year but I have read numerous times about culling of bears (including hibernating mothers and cubs), rounding up of wild horses and killing of wolves and this puts me off coming as that is what I long to see. Please consider that nature managed itself perfectly well for thousands and millions of years without us sticking our meddling noses in. Just because you can do something it does not mean you should. This is an embarrassment for your country!!



PC171

Name: Brown, Tatiana

Community of Residence: Westchester

Comment:

This is inhumane do better



Valerie Brown, Anchorage, Alaska

July 7, 2025

Alaska Board of Game
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

Re: Opposition to Predator Control Proposal in the Mulchatna Area – July 14-15, 2025 Meeting
[submitted via comment form linked at BOG website -
<https://survey123.arcgis.com/share/0a6a2779ae8f4750aee9afb83d60451b>

Dear Members of the Alaska Board of Game,

I am writing to express my strong opposition to the proposed plan to kill bears in the Mulchatna region as part of a predator control initiative ahead of your upcoming meeting on July 14, 2025.

This proposal represents another attempt by ADF&G to put forward a troubling and scientifically questionable approach to wildlife management, outside of the normal board process, after both ADF&G and the Board of Game failed to accomplish this through a normal board process and a second emergency board meeting. Procedural and substantial legal problems with the proposal have been previously identified by two different Alaska Superior Court judges. This proposal suffers from the same flaws.

The Board and the Department have demonstrated a willingness to kill bears under the guise of increasing caribou populations. You have disregarding science, judicial orders, and complex ecological relationships. You do not have enough information about what your past actions in the Mulchatna area have already done to destabilize bear populations, and you have no information about the impacts from the currently proposed lethal control of bears.

You have no scientific evidence that the Mulchatna caribou herd numbers will be increased by predator control, yet the Department continues to advocate for it. Moreover, it is now well outside the timeframe proposed by the Department for the conduct of lethal predator control during the pre-calving season. Targeting bears in the spring during the calving season lacks scientific consensus as an effective long-term solution, targeting bears now without adequate information on how it will impact either the bear or the caribou population is reckless.

I urge the Board to end the third attempt this year to implement this flawed and misguided plan. Thank you for your time and for considering my views.

Sincerely,

A handwritten signature in black ink, appearing to read "Valerie Brown", written over a faint, larger signature.

Valerie Brown



PC173

Name: Browne, Rachel

Community of Residence: Ireland

Comment:

I am opppsed to this act.

Beats are a key stone species and have a huge benefit to biodiversity

The unlawful killing of these key stone species must be ceaece with immediate effect beats should be protected under enhanced laws



PC174

Name: Bruce, Melody

Community of Residence: Enterprise, Oregon

Comment:

I am opposed to the aerial gunning down of grizzly\brown bears in the Mulchatna Caribou Management area. Especially the killing of sows and their cubs. This is an absolutely inhumane slaughter of bears that have every right to be in their habitat. I have read that AFW want to greatly expand their bear slaughter area to be adjacent to several National Parks and refuge areas where the bears are protected. This would mean that bears, whose home is in these parks where people come to watch and observe them,(which I and my family have done when visiting Alaska) could\ would be shot if they cross the unseen boundaries of these protect areas. This is totally unacceptable.

I understand that the caribou herds have declined due to several factors. But it is unacceptable to put all the weight of this on the bears who were always there and not the cause of the original caribou decline(which was more about disease and loss of traditional habitat than bears.) They are now just the scape goat for the current situation. Why is it that the predators are always the bad guy when it is so often humans who are disrupting nature? These animals co-existed quite well for thousands of years before the influx and interruption of people over the last 200 years. It is really us that have disrupted the natural order of our wildlife.

I know that, In general, a bear's diet is only 10% meat. They are primarily an herbivore. Whereas, with wolves that is not the case. We should not treat\manage wolves and bears in the same manner. In effect, bears are taking the punishment for a problem that they did not originally cause. I.E. The decline of caribou herds. As humans we always want things to be just, fair. Killing bears for a problem that they did not originally cause is unjustified. As humans, we do not expect or accept punishment for something we did not do or cause. We get very upset if something seems unjust. Why then, does it always seem that humans think an innocent animal has to be punished\killed for something that it didn't originally cause? Bears are not the cause of the caribou situation. Slaughtering them in their own habitat from helicopters is unacceptable. Why is it that game animals, (caribou, elk, moose, etc always take priority? It should not be so.

I am from the mountains of northeastern Oregon. We have family in Alaska and have been there many times. I am from an area that has all the wildlife that Alaska has except for grizzly bears and caribou. We have wolves very close to the small town that I live in. I understand the problems with living with predators. But we do not gun down wildlife from helicopters!! There are better ways. The problem is that ADFW chooses not to manage this in a right or good way, but chooses the easy, unjust, and unacceptable way. And bears pay the price of man's poor stewardship and inhumanity. It is not up to man to decide which animal is more important or to favor one over another. God created both bears and caribou. They are equally important in His eyes and we should find ways to protect them both. Not sacrifice one for the other. Please do not allow the continued slaughter of bears from helicopters and the enlargement of the proposed slaughter area to be anywhere near National Parks, wildlife sanctuaries, or Refuges!!! This entire plan\ practice is opposed by many, many Alaskans as Americans in general. And the Alaska courts have repeatedly also opposed this plan and ruled against it. Please do not vote to accept the ADFW plan for grizzly bear slaughter!



PC175

Name: Brune, Tena

Community of Residence: Kodiak, Ak

Comment:

Please do NOT kill this bear!!! She's an icon to the bear world that we only get a glimpse of!! She deserts live!



PC176

Name: Brush, Theresa

Community of Residence: Homestead fl

Comment:

Stop the killing of bears! I am completely against this horrible slaughter. Leave Gods critters alone!!!!!!!!!!



PC177

Name: Bryan, Td

Community of Residence: Tacoma, WA

Comment:

Please do not allow aerial killing if wild animals. So wrong. Thank you. Tana Bryan



PC178

Name: Bryant Jr, David

Community of Residence: Box 134

Comment:

All life is precious even bears. In some parts of the US there is no wild life left. Please don't kill any more bears!



PC179

Name: Bunyan , Georgia

Community of Residence: Alsager, England

Comment:

Stop killing innocent bears - it's disgusting and whoever does it should be ashamed of themselves.



PC180

Name: Burchett, Phyllis **Affiliation:** PhyllisBurchettPhoto, LLC

Community of Residence: GA

Comment:

I've had the incredible privilege of photographing Alaska's bears in their natural habitat, witnessing their strength, intelligence, and the tender bonds between mothers and cubs. These moments are deeply moving—and they underscore just how vital it is that we protect, not destroy, this part of our natural heritage.

The proposal to reinstate aerial gunning—using taxpayer dollars to kill bears, including sows with cubs—is not only inhumane, it's unsupported by sound science. Numerous studies have shown that such drastic measures do not lead to long-term benefits for caribou populations. Nature is complex, and healthy ecosystems depend on a balanced web of life, not the removal of one species to benefit another.

We must do better for our wild lands and the iconic species that call them home. Alaska's bears are not expendable—they're part of the American wilderness experience that so many travel across the world to witness. Let's uphold our responsibility to future generations and protect this extraordinary wildlife, not wipe it from the skies.



PC181

Name: Burgnon, Desiree

Community of Residence: USA

Comment:

Please leave these animals alone. There is enough killing of the wildlife that is done legally and thru natural selection. It has been proven over and over that killing off one species does not save another. Leave the bears alone.



PC182

Name: Burlson, Nicole

Community of Residence: Arizona

Comment:

Bears are a critical part of our environment and with no science backing these slaughtering it is just senseless killing of an innocent animal



PC183

Name: Burnmeister, Garrett

Community of Residence: St Petersburg

Comment:

I very much support ceasing the killing of these Bears. They don't understand human made boundaries and deserve to at least be replicated or redirected in an effort to save innocent wildlife



PC184

Name: Bush, Isabella

Community of Residence: KY

Comment:

I'm from Kentucky. A land filled with beautiful animals just like Alaska. This is their home too and I don't believe they deserve to die in the name of tourism. Of course if someone's life is threatened in the moment then you have to do what you have to do. To kill an animal that is just trying to survive is inhumane, and this thought process is why our earth is dying. We can live in harmony with the creatures our God placed on Earth.



PC185

Name: Buss, Cole

Community of Residence: Tualatin, OR

Comment:

We are the only thing standing between complete destruction of our children's future. If companies continue to take over the public lands and kill off wildlife, there will be nothing left. We have already crossed so many boundaries and may never fully recover from the damage we've inflicted on the environment, but that doesn't mean it's too late to try. Please stop and consider what it means to be human. We are the dominant species for a reason, and that reason is not to destroy everything that is beautiful. It is to be able to appreciate the beauty that is still here, and to try to preserve it for as long as possible. We have everything we could ever want, if only we could stop and admire it for a moment.



PC186

Name: Butler, Lacey

Community of Residence: Usa

Comment:

Please stop senseless bear killing.



PC187

Name: Butzke, Sabrina

Community of Residence: United States of America

Comment:

Please reconsider shooting of bears. Please use only sound science and accurate data to ensure the safety of these lands and the animals that roam through it. This is appalling.



PC188

Name: Buza, Joshua

Community of Residence: Seward

Comment:

Stop letting it be an attraction don't kill the bears for a wildlife perimeter it's there home stop letting people invade



PC189

Name: Byrne, Kelly

Community of Residence: Washington

Comment:

Protecting the life of animals



PC190

Name: C, Supriya

Community of Residence: India

Comment:

Save the Bears of Alaska ❤️



PC191

Name: Cabanas, Vanessa

Community of Residence: California

Comment:

Vanessa Cabanas

I am writing to express my strong opposition to the proposed intensive management program that would facilitate the taking of brown and black bears near Anchorage as a means to boost the Mulchatna caribou herd.

There is no strong scientific evidence showing that killing bears will meaningfully benefit the caribou population in this region. In fact, studies have repeatedly shown that habitat loss, disease, climate factors, and human-caused disturbances play a much larger role in the caribou decline than natural predation.

Targeting predators as a scapegoat may seem like a quick fix, but it does not address the root causes of population shifts and could cause more ecological harm than good.

Brown and black bears are integral to Alaska's ecosystem, and killing them disrupts natural balance, harms biodiversity, and ignores the broader picture of wildlife health. These animals are also deeply valued by Alaskans and visitors alike - for cultural, ecological, and economic reasons.

I urge decision-makers to reject this predator-control plan and instead focus on science-based, ecosystem-level solutions to support the long-term sustainability of the Mulchatna caribou herd.

Thank you for your time and consideration.



PC192

Name: Caesar, Jeannine

Community of Residence: Michigan

Comment:

Pleas do not kill these bears!



PC193

Name: Cage, Terri

Community of Residence: USA

Comment:

Where is the research that the killing of these bears helps the caribou population.

I have visited Alaska several times in the purpose of bear viewing.



PC194

Name: Caire , Andrew

Community of Residence: Australia

Comment:

Dear Members of the Alaska Board of Game,

I am writing to express my strong opposition to the proposed Mulchatna bear control program, which would involve gunning down brown bears from helicopters.

As someone who has traveled all the way from Australia to Alaska specifically to see brown bears in their natural habitat, I feel deeply connected to these animals. I first fell in love with the bears of Katmai National Park by watching them through the live Brooks Falls bear cams on Explore.org. That experience inspired me to travel across the world to witness them in person — a journey that was both meaningful and unforgettable.

These bears are not only iconic symbols of Alaska's wild beauty — they are living beings worthy of respect, protection, and awe. Killing them from helicopters is a deeply inhumane and scientifically questionable approach to wildlife management. It ignores the vital ecological role bears play, and it risks permanently damaging both the ecosystem and Alaska's reputation as a leader in wildlife conservation.

I urge you to reject this plan and instead commit to ethical, science-based strategies that honor the lives of these extraordinary animals and the global community who cares about them.

Thank you.



PC195

Name: Cairns , Nicole

Community of Residence: Honduras, Central America

Comment:

I am strongly opposed to the senseless culling of bears! It has never been needed in so many decades but now it is?? Nature can manage its self without man's selfish and blatantly dystuctive ideas.



PC196

Name: Calderon, Tj

Community of Residence: Woodward Oklahoma

Comment:

I am in opposition of the actions taking place in Alaska. I am opposed to shooting bears



PC197

Name: Calini, Olivia

Community of Residence: Lebanon County Pennsylvania

Comment:

I strongly oppose the proposed killing of bears to manage the caribou population. Bears are being killed for living according to their God-given instinct simply because they are unaware of when they step out of man's idea of a "safe zone." It is murder. People travel across the world to see Alaskan bears, and that population would be decreased if the killing of bears were to continue. There has been no proof that doing so has benefited or increased the caribou population. We need to protect all of Alaska's wildlife and not destroy one part of it in the name of protecting another.



PC198

Name: Call, Elissa

Community of Residence: Save the bears

Comment:

Stop doing this to our natural world!!!! Save the bears



PC199

Name: Calle, Naomi

Community of Residence: APT 1

Comment:

This is wrong and you know it



PC200

Name: Cambridge, Bell

Community of Residence: oregon

Comment:

In no world is it acceptable to be gunning down wildlife without scientific backed evidence that it would exponentially improve anything. Protect our wildlife, save the bears.



PC201

Name: Camp, Emily

Community of Residence: Fairbanks

Comment:

As a wildlife biologist and graduate of the University of Alaska Fairbanks, as well as former Vice President of the Alaska Student Chapter of The Wildlife Society, I strongly oppose the proposed regulation to allow the department to lethally remove brown and black bears in the Mulchatna Caribou Herd Management Area. There is no robust scientific evidence demonstrating that predator reduction will lead to meaningful or sustainable increases in caribou numbers, particularly when caribou declines are primarily driven by habitat loss, disease, climate stressors, and overharvest. Predator control, especially without long-term monitoring and peer-reviewed justification, undermines science-based wildlife management and risks damaging trust from our fellow Alaskans and the American public! Alaska needs to prioritize actual evidence based, ecosystem level solutions over these reactionary and ethically questionable methods that lack proven effectiveness.



PC202

Name: Camp, Larry

Community of Residence: Arizona

Comment:

Let nature be wild. Humans should stop impeding. If predators kill their food, then they'll naturally move on the other sources or die off



PC203

Name: Camp, Reidar

Community of Residence: fairbanks

Comment:

don't kill the bears it ain't cool



PC204

Name: Campbell, Cheryl

Community of Residence: Florida

Comment:

I am absolutely opposed to killing the bears. I am opposed to killing bears by shitting them from a helicopter. I am opposed to killing mother bears and their Cubs. I'm opposed to killing the bears at all. Why do you do it? Your reasons are not valid. Men have no right to control the natural rights of animals in a natural environment.



PC205

Name: Campuzano , Ruben

Community of Residence: Sanger, Ca

Comment:

“save the bears”



PC206

Name: Cancela, Carmen

Community of Residence: Puerto Rico

Comment:

Killing innocent creatures for fun is abominable. We should start living in harmony with our surroundings.



PC207

Name: Canez , Jacquelyn

Community of Residence: Casa Grande, AZ

Comment:

I am completely in opposition of the slaughter of these beautiful brown bears in Alaska.



PC208

Name: Cannava, Mathew

Community of Residence: Soldotna

Comment:

Stop killing our bears!!! Any "science" that Doug, Tim and Ryan present is a far cry from "peer-reviewed." And please do not base a decision on what Stanley, a janitor from Bethel...says. We're supposed to be using science to manage our State...not personal whims. I and so many others spend thousands of dollars to spend time with these bears every summer...and you guys and F+G seemingly froth at the mouth to shoot them/wound them from helicopters. This is sick and needs to stop. What kind of person thinks this is ok???

Every year I travel across the Inlet to spend time with the bears in the estuaries there. It is such a joy to be with these amazing animals. I've spent tens of thousands for this privilege...as do others. These bears are worth FAR more to Alaska alive then dead. Considering there is no sound science to back up so-called predator control...and considering it's a despicable practice...shooting/wounding these animals as they desperately try to escape...I strongly oppose F+G's continued efforts to shoot OUR bears from helicopters.



PC209

Name: Cannon, Kat

Community of Residence: Planet Earth that the Good LORD made

Comment:

Nature can and will take care of itself when you let it. Human interference is the greatest cause of instability and disruption in an ecosystem. Killing these bears will only cause MORE damage to an already human-caused problem. LEAVE NATURE ALONE! LET IT MANAGE ITSELF!! A much more sensible approach would be to have more caribou breeding programs that could expand the herds. Look at ways to increase life, not take life. Taking life is not the solution. It has been tried before and did not help. Do not kill the bears.



PC210

Name: Carbone, Michele

Community of Residence: Central NYS

Comment:

LEAVE THE BEARS ALONE. LEAVE NATURE ALONE. KEEP IGNORANCE AWAY!!!



PC211

Name: Card, Daylee

Community of Residence: New York

Comment:

Shooting any wildlife from a helicopter, is an inhumane and unethical act. There is no scientific evidence that the caribou population will go up as a result, so why are we going to allow senseless killing to take place in these bears' natural habitats? Bewildering that we are going to start killing bears because they inhabit an area where they belong. This cannot be allowed.



7 July 2025

Re: Opposition to Proposal 1 - 5 AAC 92.111 Intensive Management Plans, Mulchatna Caribou Herd Predation Management Area

Dear Alaska Board of Game:

I am a wildlife ecologist and environmental attorney and write in opposition to Proposal 1. My background includes a B.S. in Renewable Natural Resources (major in Wildlife and Fisheries Science), J.D., and Ph.D. in Environmental Science and Management. I have worked in wildlife conservation since the late 1990s and began my professional career working in brown bear management at Katmai National Park.

Proposal 1 is a short-sighted and ill-advised approach to achieving Departmental goals. It perpetuates the intolerance and persecution of apex predators that have long characterized wildlife management in the United States. It deems these species expendable and lacks consideration of the overarching and complex role they play in regional ecosystem dynamics. Indeed, loss of apex predators is a major driver of ecosystem destabilization and collapse (Estes et al. 2011).

The Department's stated rationale for Proposal 1 is to increase enhance caribou calf survival by killing bears as a means of increasing the Mulchatna Caribou Herd population. This rationale relies on the overly simplistic assumption that predators are the only meaningful driver of caribou populations in the region, and that "reduc[ing] large predator populations in a small defined area for a short period" is the most efficacious means of "enhancing caribou calf survival, and increasing herd abundance" (see Frey et al. 2022). The Department fails to consider how predator culls may affect caribou behavior in ways that will influence future abundance and distribution (see Ethier et al. 2024). It neglects due consideration of the delimiting force that prey populations themselves exert on species like wolves and bears (see, e.g., McLellan et al. 2024). It also fails to analyze similar programs, like British Columbia's wolf cull, whose efficacy in protecting ungulate populations is questionable (see, e.g., Harding et al. 2020; see also Horne 2024 (concluding that removing bears is unlikely to be an effective strategy in removing predation on ungulate neonates)). Finally, the Department's logic fails on its face, as there is no logical reason to believe that killing predators in a "small defined area" for a "short period" will lead to long-term caribou herd growth—presumably the program's goal (see #4 below).

The scientific literature contains extensive critiques of lethal predator control (see Bergstrom 2017 and literature cited therein). Bergstrom (2017) cites five primary reasons that wildlife managers should move away from these management techniques:

- (1) Potential disruption of top-down forcing and consequent loss of ecosystem resilience and biodiversity;



- (2) “Bycatch” or unnecessary killing of nontarget species of mammals and other wildlife that occurs with nonselective methods of lethal control;
- (3) Population reduction of certain species of native wildlife valued by many parts of society for the benefit of a few favored interest groups;
- (4) Ineffectiveness of lethal control of predators at either reducing livestock depredation or, secondarily enhancing game populations, over the long term; and
- (5) Ethical considerations about both the intrinsic value of carnivores and humane methods of killing them.

(Id. at 2.) As to the last point, aerial gunning is horrifically cruel to the target animals, many of whom must be shot over the course of multiple passes before they are killed.

Proposal 1 fails to address any of these concerns. Nor does it consider the potential economic fallout of the proposal: the Department seeks to drive down bear populations in close proximity to Katmai National Park and Togiak National Wildlife Refuge—places whose visitors each spend thousands of dollars in the hopes of seeing the very species whose population the Department seeks to decimate. Katmai also hosts the infamous “Fat Bear Week” celebrating Alaska’s brown bears. A slaughter like that proposed would be a public relations disaster for the state.

It is disappointing that the Alaska Department of Fish and Game is proposing such an extreme, anachronistic, and regressive approach to wildlife management. As everyone in this field knows, wildlife management is not about managing wildlife—it is about managing human expectations. It is manipulating wildlife populations to meet the desires of a select group of constituents (see Musiani & Paquet 2004). Managers often search for a quick fix instead of addressing greater underlying challenges (e.g., climate change, habitat fragmentation) or working to redefine our relationship with the natural world and promote interspecies tolerance.

Alaska is a beacon of hope for our native wildlife heritage, a sanctuary for species like bears and wolves that have been exterminated from much of their pre-colonial range. Proposal 1 represents an outdated approach to wildlife management—one that would tarnish the state’s reputation and fail to achieve long-term wildlife and ecosystem conservation.

The scientific literature cited herein is available at the Dropbox link below. Please let me know if you have any questions or would like to discuss this matter further. Thank you for your consideration of my comments.

Sincerely,

A handwritten signature in cursive script that reads "Kristin Carden".

Kristin Carden



Literature Cited

Available at <https://www.dropbox.com/scl/fo/5m115fis9tnqg6w3r5q17/AHSv02qOEoIRi5x-OPHK2Ws?rlkey=qm1rs18aze7vicb6prjwlvxt1&st=tlzpmq5y&dl=0>

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COMMENT(S)

not only are the animals being predators it is us humans as well as being poachers. No one is perfect regardless what position you may be. We act. So as well with the biologists as deserters, whatever they do to any fish and wildlife it is always perfect for them even it really hurts the harvesters. As collaring which the life span for a collar is 6 years. Within the period some do die for the rash they get for wearing their furs and skin. Females could produce more calves and males as well if by the collar they don't die.

By what means they had slaughter all the reindeers of Hagemester Island not even giving their kill but say they are fertilizing the Island as well as what they done to the bison down where about one of the Islands. When asked they replied its costly to remove them. Last around Tulaksak when the caribou were trying to cross the Kuskokwim to the North side with aircrafts they intercept from crossing. Latter times the villagers investigate and there they saw more than one calves which had been stampeded.



PC214

Name: Carneiro, Nicole

Community of Residence: Brazil

Comment:

I stand firmly against the current regulation proposed under the Mulchatna Caribou Herd Management and especially against attaching wider territory to propagate this absurdity. It is nothing short of outrageous to consider the sanctioned killing of brown, black bears and wolves as a legitimate conservation measure. These apex predators are essential to the natural balance of ecosystems. I highly recommend studying the theory of predatory-prey dynamics proposed by Gause. Each species plays a distinct regulatory role within its environment, maintaining population fluctuation and ensuring the sustainable cycle of natural resources.

The idea that we can selectively remove predators without long-term ecological consequences is not only scientifically flawed, it is fundamentally irresponsible. Nature has never required human interference to function. On the contrary, it is our interference in this past century, particularly through habitat loss and territorial fragmentation, that has destabilised the base of these systems, leading to the fluctuation of the Caribou population at the present moment. Introducing further disruption through predator removal is simply accelerating ecological degradation with unknown consequences. In the eyes of those who do not recognise scientific studies, it seems to be an ideal short-term solution. But when we talk about nature, nothing is short-term. Keep that in mind.

There are plenty of well-established ecological theories, which I highly suggest reading, such as the concept of trophic cascades, which demonstrates how top predators influence the entire structure and health of ecosystems, from soil fertility and water quality to vegetation density and even climate regulation. Removing these key species does not “restore balance” to the Mulchatna Caribou—it will destroy it very shortly.

We must move beyond outdated, human-centred wildlife management tactics. Killing bears and wolves is not conservation. True conservation means protecting ecological integrity, not simplifying it for human convenience. This proposal is ecologically unsound and ethically indefensible.



PC215

Name: Carnevali, Laure

Community of Residence: Ulster County

Comment:

Shooting bears from helicopters isn't wildlife management—it's an inhumane, unfair practice that strips animals of any chance to flee or defend themselves. It turns the natural world into a one-sided battleground, where power and technology dominate over respect for life. This kind of aerial hunting isn't just unethical, it also disrupts ecosystems and teaches the next generation that convenience outweighs compassion. There are more humane, science-backed ways to manage wildlife—this isn't one of them.



PC216

Name: Carrier, Claire

Community of Residence: ontario

Comment:

I oppose the reinstating of the gunning program that targets bears to manage the caribou herds.



PC217

Name: Case, Tori

Community of Residence: Texas

Comment:

Save the bears



PC218

Name: Caselgrandi Silla, Andrea

Community of Residence: Brasil

Comment:

Save the bears please



PC219

Name: Casias, Abby

Community of Residence: Manhattan, KS

Comment:

I am deeply concerned about the Alaska state government's decision to address caribou population declines by targeting bears and wolves. I am firmly against this strategy, as research shows that large-scale predator culling rarely results in lasting increases in prey populations. Numerous studies and wildlife experts have pointed out that factors such as habitat loss, disease, and harsh weather often play a much greater role in caribou declines than predation.

Eliminating bears and wolves disrupts the delicate balance of Alaska's ecosystems, where these predators play a crucial role in maintaining biodiversity and ecosystem health. Removing them can lead to unintended consequences, such as increased disease among caribou and imbalances in other wildlife populations. I urge the state to reconsider this approach and instead prioritize ethical, science-based management that protects all of Alaska's wildlife.



PC220

Name: Catero, Travis

Community of Residence: Virginia

Comment:

I strongly oppose the proposed regulation change. This practice is inhumane, unethical, and contrary to the values of fair chase and responsible wildlife stewardship. As someone who visits Alaska specifically to admire its' wildlife. Bears are arguable the most iconic part of Alaska's ecosystems and should be respected, not treated as targets for aerial gunning.

This method undermines science-based wildlife management. If population control is truly necessary, it should be carried out using ethical, evidence-driven approaches that respect both animal welfare and the long-term health of Alaska's wild lands.

This proposal does not reflect the values of conservation-minded Alaskans or the broader public. I urge you to reject this policy and instead invest in sustainable, humane, and scientifically sound wildlife management strategies.



PC221

Name: Celento, Geenie

Community of Residence: Juno

Comment:

Stop the endless killing. Bears are vital to the ecosystem



PC222

Name: Centala, Amba

Community of Residence: 20 Bedford Square

Comment:

This is a ridiculous thing to have to argue against.

Have you no compassion, have you no heart?

The world is currently in chaos with Palestine, potential world war and the cost of living crisis.

And you want to hurt innocent animals for what?!



PC223

Name: Cesario, Paula

Community of Residence: LOS angeles

Comment:

This is beyond crazy. Not logical. Now we are KILLING BEARS? Who are you nasty people? Should be fired.



PC224

Name: Chabrova, Maria

Community of Residence: Russia

Comment:

Hello! I'd like to express my concerns regarding the killing of the wild bears in Alaska. Im strongly opposed to such an unnecessary and cruel practice targeting innocent animals and violating the environment. Please put an end to this immediately.



PC225

Name: Chagnon, Bryon

Community of Residence: Florida

Comment:

If there is no evidence to support the claims that bears are responsible for caribou decline then there should not be needless killing. All creatures are crucial to ecosystem to which they live, unless they are an evasive species which bears are not.



PC226

Name: Chandler , Scott

Community of Residence: Fairbanks

Comment:

Members of the Board of Game,

Concerning changes in regulation around 5 AAC 92.111. Intensive Management Plans I.

I submit my opposition to the aforementioned regulatory changes as an Alaskan resident for whom all wild species in this state are managed for our residents' benefit and sustained yield. I do not outright object to "intensive management", aka predator control as a tool to aid in the management of other species, it has the potential to be quite powerful. However, I have not seen evidence that the state is adequately assessing whether this tool is being appropriately used. Many factors likely contribute to the reduced abundance of the Mulchatna caribou herd, with predators only being a portion of the pie. I am

concerned about the future of both predators and caribou if intensive management does not seem to be bringing about desired results. Say we remove hundreds of bears from the landscape and caribou do not increase in abundance, what do we do then? Kill more bears? At what point does the removal of bears become unacceptable when caribou don't rebound? When happens when so many bears have been removed that they are now also a population of concern in addition to caribou?

What I'm getting at is that intensive management should be performed with a carefully contracted plan to assess if it is actually working while ensuring that undo harm isn't being placed on the multiple species involved, and I haven't seen effort being invested into any plan at all aside from killing predators and surveying caribou. No effort has been made to justify the number of predators killed and the impact that has on their populations. No effort has been made to prove, without a doubt, that predators are killing caribou that otherwise would have lived (calves may be destined to die, or already have died, from weather and/or malnourishment due to climate variation and predators are finding them after or before this event.) Instead it seems the state is ram-rodging a program together because intensive management is the only tool they have to address the problem without investing in climate change mitigation, to which the Board of Game and ADFG have been taken to court and lost numerous times.

Act in good faith for the residents of Alaska. Put together a management plan for all species involved, actively study the effects of intensive management, and truly invest in whether this idea can work. Predators and prey are vital parts of Alaska. If you remove more predators than absolutely necessary to benefit prey and send those predators into states where we should be concerned about them, you will have done unjust harm to me and every other Alaskan who you are responsible for the sustainable management of the wildlife in our state.

Sincerely,

Scott Chandler



PC227

Name: Chandler, Sherry

Community of Residence: Ontario

Comment:

Stop this nonsense, stop killing animals. This is such disturbing behaviour from humans to think they have this right just enough is enough



PC228

Name: Chaouch, Hanna

Community of Residence: 5 domaine Cantagrill

Comment:

Bears should NOT be shot ! The ecosystem is a very dangerous system supporting all of us. Humans have been derailing it for long enough. Killing the natural predators of Alaska would result in catastrophic natural chain of events that we will not be able to go back on. Do NOT kill bears



PC229

Name: Chapman, Mabel

Community of Residence: Alaska

Comment:

Please stop the absolutely barbaric practice of shooting predators from helicopters! Please allow them to live. There is no scientific evidence that the caribou herds are dying out due to them.

It disgusts me that fish and wildlife officials think this is ok



PC230

Name: Chardi, Sanela

Community of Residence: United States

Comment:

I am in opposition of reinstating of taking the bears. There is no evidence this helps the caribou herd recover and it only hurts the bears.



PC231

Name: Charles, Allison

Community of Residence: NC

Comment:

I am absolutely opposed of this proposal and am asking all State legislators oppose this. As a yearly visitor to the State of Alaska my family and I come for Alaska's beauty and wildlife. Bear control programs like Mulchatna, which kill bears regardless of age or sex, can have a massive, negative impact on a local bear population's ability to replenish itself. Just like the Russians who owned Alaska first almost eradicated sea otters for their fur, or later our damming and over killing of salmon, you are destroying what makes Alaska special with this proposal and will eventually impact tourism. After a recent stay in Anchorage I would suggest you use the money to assist with making Anchorage's streets safer and help the prevalent homeless population.



PC232

Name: Chavez, Christina

Community of Residence: State of CA

Comment:

I am very strongly against the targeting and killing of bears when the evidence doesn't support it will make much impact on the herds. It's disgusting to think of someone in a helicopter picking off bears simply living their life. This is not the answer.



PC233

Name: Chemaly , Sean

Community of Residence: Plettenberg Bay

Comment:

I strongly oppose the killing of bears in the Caribou region as a means of wildlife management. This practice is not only ethically troubling but also ecologically shortsighted. Rather than targeting apex predators like bears, we should focus on science-based, sustainable solutions that respect the balance of nature and address the root causes of ecosystem imbalance. Targeted killing of intelligent, sentient animals like bears raises serious ethical questions. Wildlife management should prioritize coexistence and minimally invasive methods rather than resorting to lethal control, which often lacks public support.



PC234

Name: Cheng , Shu Yun

Community of Residence: Washington

Comment:

Leave the Bears alone!!! This is not wild animal management! wild bears matter not just for their own sake but because they help nature thrive—and humans benefit from that balance, too.



PC235

Name: Chester, Suzann

Community of Residence: Tucson

Comment:

Please leave the bears where they are. They are such a precious resource. We need the bears and the bears need us to leave them be. They are beautiful animals! Thank you for your consideration



PC236

Name: Chichester, Jennifer

Community of Residence: South Carolina

Comment:

Alaska is said to contain over ninety-eight percent of the United States' bear population, and over seventy percent of North America's (Alaska Department of Fish and Game). This percentage holds an estimated 30,000 bears. Since the founding of the Alaska Department of Fish and Game (ADFG), the aggression in predator control towards these bears has increased over time. This aggression has culminated into an acceptance of unethical practice. The ADFG's predator control programs aim to reduce the population of wolves and bears in Alaska, as they are a main predator to their food source in moose and caribou. However, more than half of the resources and research conducted to back their Intensive Management programs is dated pre-two-thousands ("Intensive Management in Alaska - Research and Resources"). They have repeatedly used outdated evidence and data to support their recent board decision. This decision was a unanimous vote on January 17th, 2025, to accept Proposal seventy-five which allows for

aerial-based removal of wolf and bear populations in a new unit (land division) of Alaska. The aim of this proposal is to protect the population of moose and caribou in the state, in fact majority of units in Alaska allow for state regulated hunting and removal. Aerial removal is currently banned in all states, with exceptions (National Archives). Alaska applies for permits to allow them to remove predators on the stance of protecting livestock. This is not only an unethical way of removing the population, but there is also a lack of evidence supporting the involvement of bears in decreasing prey population. Along with the contradicting evidence, it has received many oppositional comments from citizens of Alaska and the entire United States. Those who are in favor argue that they have experienced bad seasons of hunting. They blame this on the decreased population of prey but fail to account for all aspects that effect this decrease not just bears and wolves. To prevent the unjust removal of brown bears, the Alaskan government should restrict the authority of the Alaska Department of Fish and Game regarding proposal seventy-five.

There is minimal evidence of bears causing a population decrease in Alaska, in reference to both humans and prey. According to the U.S. National Parks Service (NPS) bear attacks on humans are rare, and the average death per year at the fault of bears is only 1 person. For an average citizen in Alaska, they are over twice as likely to die from a firearm accident while hunting than from the bear itself as shown in research by the National Center for Health Statistics. This is not the first time the Intensive Management programs of the ADFG has failed to provide accurate evidence and reasoning for the disruption of the bear population in Unit 16. The ADFG openly states that their first attempt at the management of predators in Unit 16 was “ineffective” and was therefore suspended. Proposal seventy-five aims to be effective but will likely cause unnecessary disruption to the ecosystem. Another group of animals effected by this policy is the wolf population. While bears are a main predator in Alaska, they are not the only predator. Wolves, bears, and humans are all predators of the moose and caribou populations. Since there are multiple predators in Alaska, it is not possible to give an accurate estimate mortality rate caused by each. Dr. Sterling D. Miller, an expert in wildlife management and conservation, and colleagues, originally hypothesized that “the harvest of predators was positively correlated with moose harvests” (Miller et al.). They collected over four decades of harvest data and eventually concluded that their hypothesis was incorrect. With no research to base their actions from, the ADFG is overstepping their control of predators.

Moose and caribou are a major part of Alaskan food and culture, but they are not close to being the only option. As stated, hunters are a larger part of the decrease in moose population than they’d like to admit. They hunt for many reasons including food, finances, and cultural significance. There are many other animals of land and sea that provide Alaskans with a reliable food source. Fish, goats, and sheep are just a few examples of food sources for Alaskans (Alaska Food Safety and Sanitation Program). While Alaska relies heavily on imported goods, they do have an agriculture system. According to the U.S. Department of Agriculture, “Alaska has the highest rate of new and beginning farmers in the U.S.” (Agriculture in Alaska | USDA Climate Hubs). Contrary to popular belief there are many native plants and imported plants that can survive Alaskan climate and still provide food for the inhabitants. Not only is agriculture on a rise, so is aquaculture. In the past five years, aquaculture has seen a significant increase in Alaska (State of Alaska Aquaculture Report February 2024). Alaska is surrounded by water on three out of four sides of the state. Given that there is already an increase in agriculture to provide food for citizens, why is there a need for the removal of bears for the purpose of prey protection?

The main predators to bears are humans and wolves, removing them disrupts the nature of the environment. There are currently eight national parks in Alaska, in which the policies of the Alaskan state are not adopted. According to a rule announced by National Park Service on November 13, 2015, “This

rule provides that the National Park Service does not adopt State of Alaska management actions or laws or regulations that authorize taking of wildlife, which are related to predator reduction efforts (as defined in this rule).” (“Alaska; Hunting and Trapping in National Preserves”). While there is protection from all hunting in national parks, there is little protection in most other units of Alaska. In the whole state there are only two areas where hunting is completely prohibited, and few that prohibit hunting of bears (ADFG). There is a natural predator-prey relationship in Alaska, and human interference is the only proven disturbance to this. As stated before, there are three main predators to the moose and caribou populations. Bears account for less than half of the mortality to these animals, with humans being the leading cause. Bears hibernate during the winter in periods of five to seven months, without the need for food due to fat reserves that they gained during warm season. The opposite is true and bears only hunt for seven to five months a year (U.S. National Parks Service). Alaskan citizens have no season that they are completely prohibited from the hunting of prey and are allowed to do so year-round. While most seasons that are regulated are opposite of bear’s hunting schedules, it is not always the case. Proposal 75 is questioned due to the method of removal. It calls for the aerial removal of predators. According to a work by Allison J. Russel, she states “the AHA allows Alaska to issue permits for aerial hunting, which is considered “unsportsmanlike, unethical and nearly impossible to regulate.” (Russell). The habitat of these animals has been increasingly overstepped and will continue to be if change is not made.

Some believe this proposal is necessary for various reasons, but none that prove to be anything more than preference. There are measures put in place to prevent residents and non-residents from removing unnecessary amounts of the bear population, but there is no federal or state regulation of the ADFG from doing so themselves. Proponents of the proposal, argue that they have experienced seasons of bad hunting due to overconsumption of moose and caribou. They fail to account for excess hunting of these animals by humans and have no evidence to show the main source of the decline in their population. It is important to keep in mind the importance of bears to the Alaskan ecosystem. As stated by the U.S. National Park Service, “Bears are a vital part of natural ecosystems of national parks and other wild places.” (U.S. National Park Service). It is also argued that it is deeply rooted in Alaskan tradition, which is true but not for all. This mostly applies to the Native Americans of Alaska, who use moose and caribou for their skin, meat, and for spiritual significance. However, according to the United States Census Bureau, Native Americans only account for 15.6 percent of the population (United States Census Bureau). The entire state should not be held accountable for the decisions of less than a quarter of the population. Without proper evidence or research, the removal of these predators cannot be seen as a necessary practice.

It is in the best interest of the Alaskan ecosystem for the state government to intervene with the acceptance of proposal seventy-five to the Alaska Department of Fish and Game. There is no evidence that shows bears nor wolves are singularly responsible for the decrease in prey population. Along with this, no single predator control program has been proven to work standing alone, and other measures are still a necessity. The aerial based removal practices of the ADFG are cruel use of their power. This attempt is not the first of the ADFG to control predator population, and based on the evidence provided, will likely fail as the last one did. This proposal has already caused a significant level of distress to the citizens that do not wish for the ecosystem and environment to be disrupted in this way. Agriculture is already on a rise in Alaska, and with these new sources the change in environment is unnecessary. Relocation, or humane ways of removal is arguably the best option if there is more evidence to prove the ADFG’s viewpoint. Overall, the Alaska Department of Fish and Game is abusing their power, in favor of inhumane removal of Alaska’s bear population.



PC237

Name: Chilton, Patricia

Community of Residence: Homer Alaska

Comment:

I oppose this regulation as there is no scientific evidence that taking bear lives benefits wildlife populations.



PC238

Name: Chow, Betty

Community of Residence: Los Angeles

Comment:

Not only is this illegal, but also this is not based on scientific evidence and will cause irreparable damage to the wildlife / ecosystem / food chain.



PC239

Name: Clancy , Hannah

Community of Residence: Thousands Oaks California

Comment:

I am in opposition to the program that oversees the killing of bears. Save the bears!



PC240

Name: Clark, Elyse

Community of Residence: NC

Comment:

Killing these magestic bears is literally a crime against nature! Think of the damage you would be doing before it's too late! Please consider the irreparable harm!



PC241

Name: Clark, Lex

Community of Residence: Montgomery County

Comment:

To be able to sit in a helicopter having a free for all to shoot innocent bears just trying to live their lives, especially mother with cubs, has no words. You have to be a special kind of sick to think that's okay.



PC242

Name: Clarke, Heather

Community of Residence: San Diego

Comment:

I am in strong opposition to this regulation. Grizzly bears need at least a 50 mile radius from Katmai to be protected. Please rewrite your regulation to be note reasonable.



PC243

Name: Clawson, Jady

Community of Residence: Norco

Comment:

Mulchatna Caribou are not at risk because of bears. Science proves that they are declining because of climate change, over harvest, and habitat loss. Killing these bears would be completely unnecessary, they deserve their life.



PC244

Name: Cleaver, B.

Community of Residence: Santa Fe , NM

Comment:

I completely oppose more killing of the bears.

This is bad science, and in fact, instead of being helpful, it is very damaging.

It is yet another example of bureaucrats simply arranging to kill wildlife instead of understanding the delicate ecology of a region.

This scenario has been repeated over and over, while almost always discovering later that this did not solve a perceived problem, but simply decimated wildlife for no good reason.

It is time to stop this random useless, killing and instead preserve our precious wildlife and resources.

Thank you for taking the time to read this.

For every person that gets this in time to comment and sign, please know that there are hundreds more who would passionately protest this indiscriminate slaughter, if they only knew about it in time to lodge their protests.

I sent this in the names of five members of my family, who strongly oppose the killing of the bears.



PC245

Name: Cloos, Rikki

Community of Residence: Anchorage

Comment:

I am in opposition to dispatching of brown and black bears by department staff to benefit the caribou herd. Surely there must be other ways of preserving the health of the caribou herd without taking the lives of so many bears. This management technique is surely also emotionally damaging on the humans who have to carry out these orders.



PC246

Name: Cohen, Jen

Community of Residence: New York

Comment:

Please DO NOT kill bears for population control of caribou. There is no direct link and you are threatening their ability to survive in the wild. Wildlife deserve to live in peace and humans and lawmakers continue to murder them, destroy and their habitats, food, etc. this then makes them more desperate and vulnerable and misperceived to be a threat. Please PROTECT these bears and wolves and do not kill them. We need to be more reciprocal and not offset the balance of nature more than we already have.

Thank you.



PC247

Name: Cohrs, Kelley

Community of Residence: Bakersfield, California

Comment:

I oppose this proposed legislation. There is no scientific evidence to support that killing these bears will protect the caribou.



PC248

Name: Cohrt, Katherine

Community of Residence: San Bernardino, CA

Comment:

I don't believe killing bears from helicopters will help the caribou population. There is no scientific evidence to show or prove that less bears will improve the caribou population. Do not open the option for this.



PC249

Name: Cole, Laura

Community of Residence: Greensboro

Comment:

I oppose the bear kill proposal. It is not science based and unnecessary.



PC250

Name: Coleman, Terry

Community of Residence: NA

Comment:

We can't keep destroying what our creator has given life to... We have to stop destroying the nature of life, (wildlife)...humans.. earth!



PC251

Name: Conklin, Lori

Community of Residence: Eagle River, AK

Comment:

I am opposed to this proposal. As an anesthesiologist who deals with the scientific method in my profession, I studied your data and this slaughter will not impact caribou numbers. It will only paint ADF&G in a negative light. No licensed hunters are allowed to harvest brown bears from helicopters and with good reason. We can't even use a WiFi signal to ascertain if our bait has been hit during bear baiting season. If you are that convinced the caribou herd will magically increase in population, open up an extra season for Residents to participate in a fair game hunt.



PC252

Name: Connell, Greg

Community of Residence: Pittsburgh, Pennsylvania

Comment:

Please assist and assist all bear killings and torture. Barbaric insanely inhumane and criminal. The process that is unfolding air to for.. immediately stop the random bear killings Alaska overly evil



PC253

Name: Connors, Kate

Community of Residence: United States

Comment:

There should be no extended use of guns to hunt brown or black bears in Alaska. This is a horrible piece of legislation.



PC254

Name: Contreras, Yaniel

Community of Residence: Y

Comment:

Stop killing bears.



PC255

Name: Conway, Chris

Community of Residence: Fairmont Hot Springs, BC, Canada

Comment:

I strongly oppose the killing of Alaska's bears.

This is not responsible wildlife management—it's a cruel and unnecessary slaughter. Shooting bears from helicopters, including mothers and cubs, is inhumane and scientifically unjustified. The state's own reports show that bear predation is not the main reason for caribou decline, yet hundreds of bears are being targeted anyway.

This kind of action erodes public trust, damages Alaska's natural balance, and sets a dangerous precedent. It's time to stop hiding behind flawed policy and start treating Alaska's wildlife with the respect it deserves.

End the bear killings now.



PC256

Name: Cook, Corban

Community of Residence: Utah

Comment:

I oppose the killing of all animals



PC257

Name: Cook, Ember

Community of Residence: British Colombia

Comment:

These bears should not be killed in their own home!



PC258

Name: Cooper, Keith **Affiliation:** West End Ecology Tours

Community of Residence: Florida

Comment:

This is an abomination...stop killing wildlife...sick people in government...



PC259

Name: Cooper, Sally

Community of Residence: 98 Main Road

Comment:

All wildlife should be protected. It seems to be particularly cruel to kill these beautiful animals from a helicopter. To run them down and terrify them. Please reconsider this terrible decision. .



PC260

Name: Cooper, Salvades

Community of Residence: California

Comment:

Stop this horrific act of killing bears. Let them live their life. They're not harming anyone. Humans need to stop being so invasive and killing every creature we share this land with.



PC261

Name: Copley, James

Community of Residence: Pennsylvania

Comment:

I don't think anything should be killed without a good reason, the bears and their natural habitat should be respected and not harmed.



PC262

Name: Corless, Logan

Community of Residence: Utah

Comment:

We decided to be in their land, don't punish the wildlife for being in the wild. The circle of life exists and we do not need to be a part of it to this extreme amount



PC263

Name: Correz, Frederico

Community of Residence: Brazil

Comment:

Stop to kill animals! You are [REDACTED]



PC264

Name: Corson-Foster, Jamie

Community of Residence: Olympia WA

Comment:

I LITERALLY CANT BELIEVE HOW CRUEL YOU PEOPLE ARE. You want public comment? You should be ASHAMED. I am heart broken and outraged. Shooting hundreds of bears from helicopters is COWARDLY, CRUEL and should be CRIMINAL. This benefits no one but your EGOs. Shame on you!!!



PC265

Name: Cortez, Rochelle

Community of Residence: 10

Comment:

Save the bears from humanity thinking they are more important



PC266

Name: Corum, Marianna

Community of Residence: Madison

Comment:

alaska is not only the home of humans, but also bears. they are not a threat to us as long as we stay away and they should not be shot



PC267

Name: Coskun, Peter

Community of Residence: Arizona

Comment:

I completely oppose any measure that allows for the option for anyone to violently remove bear cubs or any other wildlife for that matter. There is no reason for culling these animals, none whatsoever. Relocation of wildlife in a safe and ethical manner is a far better option. Please take this into consideration as someone who visits the Alaskan wilderness to see these incredible creatures in their natural habitat.



PC268

Name: Cottrell, Kaylee

Community of Residence: Oklahoma

Comment:

Growing up in Oklahoma I'm well traversed in hunting, for gathering. Not even for sport. So why are taxpayers dollars being used for such a cruel and unusual "sport"? Please do not reinstate this program, leave the bears alone.



PC269

Name: Courie, Haley

Community of Residence: Southern California

Comment:

Shooting every bear with no tracking is absolutely abhorrent.

There's no scientific evidence this helps caribou.

It's a waste of taxpayer money.

And it's ethically indefensible.

There is no reason for this to continue and if it does we will be furthering the indescribable amount of damage humans have done to the natural environment. We cannot save one species at the risk of another. These animals don't deserve to die.



PC270

Name: Covert, Bradley

Community of Residence: Michigan

Comment:

If interactions with humans are the issue then close off the area to people. Don't kill bears because people are dumb, the bears are just doing what they do naturally. This really shouldn't even have to be explained.



PC271

Name: Cox, Lisa

Community of Residence: Jupiter, Florida

Comment:

Please do NOT kill or hurt the bears! Their lives matter! Please PROTECT them!!!! I oppose killing the bears!



PC272

Name: Cox, Shallon

Community of Residence: Yukon

Comment:

I am opposed to the taking of bears. Do not kill them in favor of the herd, that is not our responsibility as humans. Killing innocent animals, which may or may not solve the problems at hand, is a gross misstep in excuting our authority as the apex predators of this land.



PC273

Name: Cox, Tara

Community of Residence: Missouri

Comment:

I am highly against the senseless killing of these bears. This isn't science, this is cruel. Caribou herds are not at risk because of bears. Where is the science to back that up. Please, I urge you to not let this happen. Thank you for your time.



PC274

Name: Cozzi, Marybeth

Community of Residence: Greenlawn

Comment:

Please protect the bears in Alaska. We need to protect our wildlife and this is illegal killing of these bears.

Please do everything humanly possible to STOP this illegal killing of these beautiful bears.

Protect our wildlife

Please stop shooting the bears in Alaska. This is absolutely disgusting and so unnecessary.

We need to protect our wildlife and that's all wildlife. This is just so cruel and very upsetting.

Please do not continue this disgusting act.



PC275

Name: Crabb, Romy

Community of Residence: United Kingdom

Comment:

There is no excuse for this atrocious violation of animal rights. These bears have done nothing wrong, and should be protected by the Alaskan government instead of left to be killed off like vermin. The safety of this wonderful species is at risk, and they must be protected.



PC276

Name: Cramer, Sally

Community of Residence: Seattle

Comment:

Save the bears.



PC277

Name: Crawmer, MaryAnne

Community of Residence: Agoura Hills, California

Comment:

I am writing to express my firm opposition to the aerial shooting of brown bears by the Alaska Department of Fish & Game near Katmai and Lake Clark National Parks.

The decision to kill nearly every bear spotted from helicopters — including mothers with cubs — is scientifically unfounded, ethically indefensible, and ecologically reckless. There is no credible, peer-

reviewed evidence showing that this type of predator control benefits caribou populations long-term. In fact, broad-scale predator removals often destabilize ecosystems and can create cascading negative impacts.

This action also undermines the values of conservation and responsible wildlife stewardship. The bears in this region are part of a globally recognized and economically valuable ecotourism industry. People travel from around the world to witness these wild animals — particularly in places like Brooks Falls — and killing them just miles outside park boundaries risks erasing an irreplaceable experience and resource.

A judge has already ruled portions of this killing spree illegal, yet the state continued — a blatant disregard for lawful process and ethical wildlife management. This program is a misuse of public funds and a betrayal of public trust.

I urge the Alaska Department of Fish & Game and relevant decision-makers to immediately halt this program and invest in scientifically grounded, ecologically sound, and humane wildlife management strategies.

Sincerely,

Maryanne Cramer

Agoura Hills, CA 91301



PC278

Name: Crissman, Emma

Community of Residence: United States

Comment:

Oppose. How does taking of brown and black bears benefit them? Why does it have to resort to killing? Killing bears in their natural habitat does not make sense. I believe we can do better.



PC279

Name: Crocker, Sandra

Community of Residence: Silver Spring, Maryland

Comment:

I strongly oppose the senseless killing of the bears. There is no scientific evidence that thinning the bears will help the caribou population. You may be thinking why does a lady that lives in the lower 49 care about what happens in Alaska, well it has been a dream of mine to visit Alaska. (Since I was a child) when I think of visiting the first animal that I was to see is the bears. Don't take that away. There are other ways to redirect the bears or deter the bears. Even here in Maryland we have a deer issue, when Maryland Natural resources thin the deer they only kill the Bucks, never the Doe or the fawns. Please don't kill my dream before I can make it a reality!!!!



PC280

Name: Crofton, Sameena

Community of Residence: Kenai

Comment:

There is no scientific evidence that this will revive the Caribou population. Please stop taking animals from their homes. Let nature be the bears only enemy. This is unjust.



PC281

Name: Cronan, Mary

Community of Residence: Midland Park, NJ

Comment:

I oppose the proposal.

The best method to ensure a healthy population of caribou and a healthy environment is to allow nature to balance the bear population. There is no need for the mass execution of the bears.



PC282

Name: Crosby , Lindsey

Community of Residence: Wilmington

Comment:

Please save the bears and stop the illegal killing.



PC283

Name: Cruz, Ashley

Community of Residence: WA

Comment:

DO NOT KILL THE BEARS!



PC284

Name: Cruz, Gina

Community of Residence: Los angeles

Comment:

Gina Cruz

Opposition of Bear killing to manage Caribou

This bear killing is a barbaric practice and should be stopped. There is no science to support that removing bears will increase the numbers for the Caribou. Humans have already taken so much of what was their land please do not allow the proposed shooting of these bears from helicopters to continue or restart. Many taxpayers do not want their monies used like this! Please stand against this. You are so fortunate to have the honor of managing this beautiful land of Alaska that so many of us visit. Many of the bears in jeopardy are the same ones we enjoy seeing at Brooks Falls and Katmai. This brings far more tourism to Alaska than the hunting for Caribou from a financial standpoint.

Please, please do not allow this change in policy to pass. Please save the bears for future generations!

Gina Cruz

A loyal Alaska visitor



PC285

Name: Cruz, Stephany

Community of Residence: Minooka IL

Comment:

Please don't do this! Please save the bears and do not allow this to take place!!!!



PC286

Name: Cullen, Meagan

Community of Residence: Southern Ontario, Canada

Comment:

Opposition to Proposed Predator Control Regulations

I strongly oppose the proposed predator control regulations targeting bears and wolves as a means to increase Mulchatna caribou numbers. Scientific evidence shows that predator control is ineffective and overlooks root causes such as habitat loss and disease. Bears and wolves are vital to ecosystem health and deserve protection and empathy. Please see the attached detailed comment for my full reasoning.



Written Comment to the Alaska Board of Game

July 8th, 2025

Introduction

To the Alaska Board of Game,

I strongly oppose the proposed predator control regulations under 5 AAC 92.111(c) targeting bears and wolves in the effort to increase Mulchatna caribou numbers.

Background on Mulchatna Caribou Decline

The dramatic decline of the Mulchatna herd is deeply concerning, but science has shown that predator control is not a proven solution. Multiple studies and field observations suggest that habitat loss, nutritional stress, disease (such as brucellosis), and illegal harvest are the primary drivers of the caribou population crash—from nearly 200,000 animals in the 1990s to around 12,000–15,000 today (Alaska Department of Fish and Game [ADFG], 2023; Joly et al., 2021). Aerially killing 200 bears and dozens of wolves has not brought measurable recovery—and cannot address the root causes (ADFG, 2024).

The Ecological Role of Bears and Wolves

Bears and wolves are not the problem. They are intelligent, sentient, ecologically essential beings who shape the landscape in ways we still do not fully understand. Bears distribute seeds, fertilize soils, and regulate prey species (Noyce & Garshelis, 1997; Boulanger & Stenhouse, 2014). Wolves cull the weak and diseased, contributing to the health of prey populations (Mech & Boitani, 2003). To blame them for the consequences of human disruption—overhunting, climate change, industrial development, and habitat degradation—is profoundly unjust (Ripple et al., 2014).

Ethical Considerations and Empathy

More importantly, they deserve empathy. These animals are not merely tools in a game-management equation. They live, parent, roam, and exist in harmony with the land—until we interrupt that balance with helicopters, bullets, and fear.



Killing these creatures may give the illusion of control, but it only deepens the ecological imbalance and public distrust. The recent court ruling that halted this program emphasized the lack of transparency, scientific review, and public process. It is not just biologically misguided—it is legally and ethically flawed (Alaska Superior Court, 2024).

Recommendations for Effective Conservation

If we are serious about restoring the Mulchatna herd, then we must take serious, long-term action:

- Restore and protect lichen-rich tundra habitat (Joly et al., 2021),
- Monitor disease impacts with transparency and peer-reviewed research (ADFG, 2023),
- Enforce hunting regulations and support Indigenous-led conservation strategies (Harris et al., 2022),
- And above all, replace fear-based management with science, compassion, and coexistence.

We have the intelligence to find better answers. We have the responsibility to do better. And we have the opportunity, right now, to be the generation that chooses empathy over extermination—responsible guardianship instead of destructive intervention.

Conclusion

Please reject this proposal. Let's build a future where bears, wolves, caribou, and people all belong.

Sincerely,

Meagan Cullen

A 27-year-old concerned citizen from Ontario, Canada. I come from a family of farmers and was raised to respect the land, its rhythms, and the creatures who depend on it. I care deeply for animals—not just as individuals, but as essential threads in the fabric of healthy ecosystems. I believe we must choose compassion and thoughtful care over forceful control and short-term fixes.



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- Ripple, W. J., Estes, J. A., Beschta, R. L., et al. (2014). Status and ecological effects of the world's largest carnivores. *Science*, 343(6167), 1241484.



PC287

Name: Cullen, Shawna

Community of Residence: USA

Comment:

Dear Board of Game, please reconsider this culling plan and appreciate the disastrous effects it will have on the ecosystem of Alaska. There has been no high-quality, scientific research conducted which indicate that the mass killing of these bears will preserve caribou populations. This will be a gross misuse of tax payer dollars and an assault on the balance of nature. Please make the proper choice to terminate this plan promptly. I am in opposition of this plan.

Sincerest thanks, Dr S. Cullen PhD



PC288

Name: Culver, Shelley

Community of Residence: Rocky mountains

Comment:

As someone who with a degree relating to water quality, I feel the reminder is needed since you are reinstating this asinine program. Native predators like bears (and even wolves) are NECESSARY for a healthy aquatic ecosystem in every biome in animal kingdom, especially Alaska. Populations of their prey get too high and lessen the water available for EVERYONE, including alaskan constituents. There is less greenery, less oxygen, and less carbon absorption when the prey animals are left unchecked in their NATURAL ORDER OF THE FOOD CHAIN. I always dreamed of living in Alaska, but with taxpayer money being used for such dumb and cruel practices, I will never visit again. I will never consider Alaska a liveable place, how could anyone in the shadow of such SENSELESS death? I will never support the economy of a state who does not use science in its environmental management. I will never recommend Alaska for anyone to visit ever again if this continues for even one more day.



PC289

Name: Cumba, Melissa

Community of Residence: Florida

Comment:

Please leave the animals alone. You are what keeps Alaska full of wildlife & beauty. Please don't take that away from your beautiful country. Keep them safe. Keep them alive. Protect your natural habitats. Don't destroy them



PC290

Name: Curtis, Carrie

Community of Residence: Anchorage

Comment:

I am against hunting any animal without specified amount. I agree the state has an obligation to maintain a balance of the herd, but without limitations it would be dangerous to the bear population. There needs to be a boundary of how many, in my opinion. I would like to preserve a balance in nature.



PC291

Name: Cutshall, Jennifer

Community of Residence: Portland OR (former Alaska resident)

Comment:

This slaughters of our precious and healthy wildlife and apex predators is completely inhumane. If Alaska cannot embrace a humane protocol, there is little hope. The lower 48 depends on a thriving Alaska...they are not exclusive. We cannot slaughter majestic animals without a devastating price on the ecosystem and global warming. I don't know about you, but I don't need another golf course instead of wilderness. I staunchly oppose the relentless and thoughtless killing. Protection our last wild places, protect the inhabitants, and save our precious



PC292

Name: Cypra, Steven

Community of Residence: Fishhook

Comment:

I am opposed to this lame effort to circumvent court orders. Surely the State of Alaska can do better despite who is directing this.



PC293

Name: Czerwinski , Karin

Community of Residence: Germany, Bavaria, Bayreuth

Comment:

If the caribou population is dwindling due to negative environmental impacts and the removal of caribou for human consumption, it is hardly the right course of action to kill natural enemies of caribou in order to consume caribou as humans. Rather, wildlife should be left to fend for itself and, above all, every effort should be made to halt climate change. Humans can easily do without game meat, bears and wolves cannot.

So please stop killing bears and wolves.

Thank you.



PC294

Name: D, Cara

Community of Residence: Florida

Comment:

Save the bears.



PC295

Name: D, Jessica

Community of Residence: Boston, MA

Comment:

I wholly oppose the initiative of killing the vital bear population in question.



PC296

Name: Dabis, Sonya H

Community of Residence: Arizona

Comment:

Stop killing the bears!!!

Thank you!



PC297

Name: Dadourkova, Barbora

Community of Residence: Oregon

Comment:

Just don't



PC298

Name: Dahlmann, Alison

Community of Residence: France

Comment:

Bears are symbols of the Alaska

Protection them is part of your duty



PC299

Name: Dailey, Maria

Community of Residence: Austin, Texas

Comment:

I strongly oppose Proposal AAC 92.111, which seeks to re-establish department-led control of brown and black bear populations within the Mulchatna Caribou Herd (MCH) Predation Management Area. While the stated objective of increasing the Mulchatna Caribou Herd (MCH) for human consumptive use is understood, this proposal represents a problematic intervention that prioritizes a single species for human benefit at the expense of ecological balance. The intensive management (IM) of predators, specifically the lethal removal of bears and wolves, disrupts the natural predator-prey dynamics and undermines the fundamental principle of allowing Alaska's wild ecosystems to function without constant human manipulation.

Furthermore, the prior intensive management program targeting bears in this area was vacated by the Alaska Superior Court in March 2025, indicating significant legal and ethical concerns with its implementation. Simply re-proposing the same measure without a comprehensive re-evaluation that addresses the court's findings and provides robust evidence of the long-term sustainability of the bear population under such pressure is insufficient. Alaska's wilderness is defined by its intact natural processes, where predators like bears and wolves play crucial roles in maintaining the health and resilience of prey populations by culling the weak and diseased. This natural selection fosters stronger, more adaptable caribou herds in the long run. Embracing coexistence means allowing these natural systems to operate, recognizing the intrinsic value of all species, and refraining from interventions driven primarily by a desire for increased human harvest.

Sincerely,

A Concerned Citizen



PC300

Name: Daku, Lindsey

Community of Residence: Ambler, PA

Comment:

I do not support kill-methods of wildlife management. It's cruel and not backed by evidence to support sustainable conservation efforts. Please delay or deny the modification of the regulation and explore other means to protect the caribou population.
