

Commentor: Jennifer Culbertson

Location: Kodiak, Alaska

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PROPOSAL 1 : 5 AAC 92.111. Intensive Management Plans, Mulchatna Caribou Herd Predation Management Area. Modify the Mulchatna Caribou Herd Predation Management Area to allow for the take of brown and black bears by department staff to benefit the herd as follows: Allow black and brown bears to be removed by department staff as part of the intensive management plan for the Mulchatna Caribou Herd (MCH).

I OPPOSE PROPOSAL 1:

1.The Science doesn't support it. There have been no bear surveys conducted to in the management area - therefore, there is no proof that a substantial population of bears exist. Consequently, there has also been no proof that bears predate on caribou to the extent that they effect overall caribou herd health or numbers. There have also been no studies on winter forage availability or quality, despite it being a legal requirement under predator control regulations.

2.This proposal puts the interests of a handful of people within the Department of Fish and Game above the interests of the Alaskan people and the law. The state violated the rule of law by implementing a management plan that did not meet the basic criteria of lawful game management: sustained yield, public review and lack of habitat research- and then violated the law again when it continued to cull bears despite a court order to stop doing so.

3. This management plan jeopardizes the livelihood of the many Alaskan business engaged in tourism and wildlife viewing by creating a ripple effect on bear populations that move between the two national parks, Lake Clark and Katmai and the 40,000 mile killing zone. As the state has no idea how far individual bears move, they also have no idea which bears they are killing. Currently, Lake Clark and Katmai National Park are responsible for most of the tourism related to bear viewing in the state of Alaska. Millions of people watch the bear cams on the Brooks River in Katmai National Park, these iconic bears are a large part of the reason people visit Alaska.