

ADF&G released 3 new documents last Wednesday, after many of us had already submitted online comments. The new Management and Research Reports appear to be PowerPoint slides with no explanatory text. Some Slides are difficult if not impossible to understand without more information. There are frequently no sample sizes, or sample sizes given are not pertinent to what's being presented in the Slide. And there are inconsistencies from one slide to another in sample sizes or numbers for the same thing. There are also outright errors.

ADF&G will likely stand by whatever they present. Their presentations will come after public testimony and will include verbal explanations that are not in Slides the public can view online. The Board will probably hear oral explanations, but with no written text to follow.

I'll briefly go through some of the problems with the PowerPoints, starting with the Management Report:

Slide 7--The 11 brown bears shot would have been within the 2025 Bear Removal Area. What does Observed/marked mean? How were Bears marked? Were all the observed Bears also marked? When were the Bears marked. What about the Bears seen on Federal land? How do they fit in?

Slides 17 and 18—both these Slides combine data from the East and the West. The issue at hand is whether bear predation in the West was causing lower fall calf:cow ratios. Data from the East are only useful for comparison. From 2011 to 2021 collared calf mortality was generally higher in the East, as clearly shown in Figures 4 and 5 in the current IM Implementation Plan for the MCH. Including data from the East in Slide 17 makes both total mortality and the proportion killed by Bears look higher than it really was in the West.

Slide 18 shows the actual number of calves that died each year, East and West combined. The totals each year are largely a function of how many calves were collared (it wasn't the same each year, and in some years only one herd segment was collared}. Slide 18 is virtually worthless. Looking at Slide 18 in isolation it would be easy to conclude (erroneously) that mortality was very low in 2024 (lots of Bears removed) and much higher in 2025 (few Bears removed). But only Western calves were collared in 2024 (N=52). In 2025 much larger numbers of calves were collared (N=155), with 74 the West and 81 in the East.

Slide 19—there are 12 calf deaths here, versus 8 for the same year in Slide 18. 12 is the correct figure. And sample size was 52 (55 collars were put out but 3 never transmitted and shouldn't be included).

Slide 20—as shown makes it look like early calf mortality was similar in the West and East in 2025. It wasn't when considered as the proportion of calves collared. In 2025 mortality in the West was lower than in the East (statistically significant at $p > 0.1$ in a chi-square test).

However, comparing 2025 versus 2024 for the West, there was no statistically significant difference, not even close. A valid conclusion would be that Western calves survived just as well in 2025 with 11 Bears removed as they did in 2024 with 81 Bears killed.

Slide 21—fall calf:cow ratios went up in 2023 and 2024, but why? It doesn't look like Bear predation on newborn calves was a factor. Also, there were several years before any Bear removal where high early calf survival in the West did not lead to higher fall ratios. (see my previous comments to the Board, RC1466). That doesn't support ADF&G's conclusion that higher ratios in 2023 and 2024 were due to Bear removals.

Slide 29—what are “unique Bears” in 2024?

Slide 36—Impossible to interpret without more information, but ADF&G will probably use these data to somehow estimate Bear density.

Slide 37—Figures are all but meaningless unless equal search effort was expended each day, which is highly unlikely.

Slide 38—How did they calculate density? Again, effort expressed in “days” is meaningless unless effort every day was the same.

Research Report:

Slide 5—This slide sets the stage for a faulty conclusion because the logic is flawed. ADF&G is using nutrition and disease data from both herd segments combined and from a single winter (2023-2024) to explain what must have happened during 2011 to 2021 in the Western segment. That's where the ~25:100 comes from. It's the mean fall calf:cow ration for the Western segment for 2011-2021. They're essentially assuming that the present condition of cows also prevailed from 2011 to 2021. That wasn't the case. Pregnancy rates were below 90% for all of 2011-2021 and below 80% for 2017-2021. Cow mortality was about 80% from 2011-2021 and there was a marked drop in the West in 2017 (see page 5 and Figure 8 in the current Operational Plan). Biologists noted clear signs of active Brucellosis (retained placentas, swollen joints, etc.) during 2021-2021.

Slide 16—These data are for West and East combined.

Slide 18—Sample size has increased from 60 to 71. But 4 of 71 collars failed. They should be censored from calculations and the sample size for determining mortality should be 67.

Slides 29-37—Looks like all analyses are for both herd segments combined.

Slide 38-39—It looks like early calf survival was higher in the West in 2024, when many Bears were removed, but not different in 2025, when few Bears were removed.

Slide 40—explicitly makes the conclusion that survival in the West in 2024 was indeed higher than in 2025. But the difference was not statistically significant (ADF&G didn't even look at significance). That is, survival in the West was not higher in 2024 than in 2025. Stopping Bear removal in 2025 did not depress calf survival. Calves did as well with minimal Bear removal in 2025 as they did with major Bear removal in 2024.

Slide 48—Recruitment to autumn in 2024 was statistically higher in the West. These data are from observing calves of collared cows. There are no comparable data from collared calves because none were collared in the East in 2024.

Slide 54—Adult survival and pregnancy figures are from 2023 and 2024 (maybe some from 2025) and for both herd segments combined. The Calf Recruitment and Survival is from 2011-2021. ADF&G presents no data on adult survival and pregnancy for 2011-2021. ADF&G is using apples to explain oranges. We know from other ADF&G reports that adult survival and pregnancy rates during 2011-2021 were sometimes much lower than in recent years.

Conclusion

We still don't know what caused low fall ratios in the West from 2011-2021, and ADF&G isn't making a rigorous attempt to find out what the cause was. They're assuming it was Bear predation on newborn calves, but the data indicate it was more likely to have been something else.

Also nothing in the Research Report mentions the large number of calves found dead from malnutrition, dehydration, "failure to thrive," and mineral deficiencies in 2024. I don't think those findings have ever been shared with the Board. They're in the [2024 spring mch intensive management memo.pdf \(SECURED\)](#). There is evidence that the MCH has some nutrition/disease problems, even if the collared cows in the Research report study didn't show it.