

I am a 58-year resident of Alaska, and I am a former member of the Alaska Board of Game. I very strongly oppose the Department's and the Board of Game's efforts to re-authorize aerial shooting of bears in the Mulchatna region. under the guise of "caribou survival."

Until the Board and the Department have in hand defensible estimates of bear numbers, based on reliable field surveys, it is simply unconstitutional to pursue the Board's intended aerial killing of bears, because the constitutionally-required "sustained yield" documentation of bear numbers has not been available to support the proposed intensive management of these animals.

The decisions of the Superior Courts in Anchorage have correctly pointed out the serious legal flaws in the approach that the Department and the Board are taking with regard to declining Mulchatna caribou numbers, and their attempts to pin all of the blame on bears. It seems to be simply, "shoot first, and (perhaps) count later."

Until the Department can base its intensive management of bears on a reliable baseline population number for brown bears in the Mulchatna region, it has no legal authority to pursue intensive management of these bears, to the disregard of all other factors that may contribute to low caribou calf survival.

For this reason, I urge that the Board of Game reject the continuation of the Mulchatna predator-killing intensive management of bears. It should resume this management only if it can first support intensive management with firm population figures that demonstrate the protection of the sustained yield of the brown bear population.