

Bill Kane  
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Igiugig, AK [REDACTED]  
July 14, 2025

Alaska Board of Game  
c/o ADF&G Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Re: Proposed Expansion of the Mulchatna Intensive Management Program

Dear Board Members,

I write as a biologist with more than a decade of professional experience in land relationship planning (i.e., natural resource management) alongside state, federal, university, and Tribal partners, and as a non-Indigenous resident of the Bristol Bay region for the past four years who now serves as Tribal Stewardship Director for Igiugig Village. My comments represent my own professional judgment and lived experience, not an official Tribal resolution.

### **The Proposal Conflicts with Court Findings and Best-Available Science**

Recent superior-court rulings (e.g., March 2025 decision vacating the 2022 bear-removal regulation) determined that the State's prior Mulchatna predator-control actions lacked lawful process, credible data, and meaningful public participation.

Dozens of Alaska wildlife professionals have likewise concluded that aerial gunning of wolves and bears has not demonstrated a causal, measurable increase in Mulchatna caribou recruitment.

The new proposal would authorize lethal removal across ~40,000 mi<sup>2</sup>—an area larger than many U.S. states—yet no peer-reviewed “before/after, treatment/control” framework is in place to verify need or efficacy. A management tool that cannot be evaluated cannot be justified.

### **Data Gaps Undermine Adaptive Management**

The operational plan still lacks:

- Baseline predator abundance derived from systematic survey methods;
- Rigorous calf-survival metrics that separate predation from habitat or climate drivers;
- Independent review of results by qualified, external scientists.

Without those data, expansion risks repeating the cycle of court challenges, wasted resources, and public distrust.

### **Respect for Community and Tribal Consultation**

Over four years working side-by-side with Yup'ik, Dena'ina, and Alutiiq communities, I have seen that wolf and bear stewardship is inseparable from cultural identity and subsistence security.

Re-authorizing broad-scale predator killing without early and ongoing government-to-government consultation disregards the State's own Consultation Policy and the Federal Trust Responsibility.

**Recommendation**

I respectfully urge the Board to decline the proposed regulation change on July 14.

Instead, I recommend the following pathway

1. Initiate a formal Tribal consultation process with all Bristol Bay and Kuskokwim area tribes before any new predator-control authorizations.
2. Commission an independent, peer-reviewed study to:
  - Re-assess Mulchatna caribou limiting factors (habitat quality, climate, hunter access);
  - Design a statistically defensible monitoring protocol (treatment vs. reference areas) if any lethal control is again considered.
3. Report study results publicly and re-open a full, advertised comment period prior to further Board action.

Alaska's Constitution enshrines sustained yield for all wildlife. Programs that cannot demonstrate effectiveness—or withstand judicial scrutiny—do not meet that mandate. I respectfully ask the Board to place science, process integrity, and Tribal engagement at the forefront and vote no on the proposed expansion.

Thank you for considering these comments.

Sincerely,



Bill Kane

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