

14 July 2025

To: Alaska Board of Game

From: Jeanie Cole, Fairbanks, AK

RE: Comments on Mulchatna Predator Control

I am writing in opposition to the State's continuing efforts to eliminate predators from the Mulchatna Caribou herd's range and to amend regulations to add bears to the ongoing slaughter of wolves.

ADF&G's own studies indicate that disease, nutritional stress, wounding, and illegal harvest are all factors affecting caribou numbers. The 12-year study concluded that wolf predation was not primary a factor in the decline of the herd (October 2024 memo from Todd Rinaldi to Tim Peltier). In the spring of 2024, they found that over 50% of the caribou calves had died or were dying of starvation, dehydration, lacking trace minerals, and having little to no body fat.

The herd's habitat has been affected by climate change. Vegetation shifts towards more shrubs and less forbs and lichen has occurred. There has also been an increase in winter rain, resulting in ice layering within the snowpack, making it more difficult for caribou to paw through the snow to reach the lichen.

About \$500,000 dollars has been spent on the State's predator control program, sacrificing hundreds of bears, and yet the herd continues to decline. Obviously predator control is not working.

It is not rational to conclude that bears are responsible for a decline of close to 200,000 animals over a few years. The herd is suffering from substantial nutritional stress. Eliminating bears (or wolves) will not have an appreciable effect on population. The money spent on questionable predator control would be better spent in studying the root causes of the herds decline.

Also it is cruel and unethical to hunt bears and wolves from aircraft, not to mention killing bears with cubs. This program should be discontinued.

It goes against state regulations which allows the Commissioner to authorize predator control of wolves and also provides that predator control of wolves should be suspended “if, after three years, the harvest of wolves is not sufficient to make progress towards the IM population objectives for wolves” and/or “if, after three years, any measure consistent with significant levels of nutritional stress in the caribou population are identified.” Significant levels of nutritional stress has been identified in the Mulchatna caribou herd.

Many Alaskans, including scientists, hunters, guides, and wildlife lovers are opposed to ADF&G’s intensive management program. In March, the Anchorage Superior Court found the agency at fault on a number of claims and they were forced to stop the bear killing program. But now the agency proposes to continue the plan for three more years. Like many caribou herds, this herd has declined because of several factors: range conditions, disease, nutritional stress, and climate change that has altered the habitat.