

Record Copy related to RC009, “Petition for Emergency Regulations for Intensive Management of Mulchatna Caribou Herd”

My name is Jeff Stetz. I have been a professional wildlife biologist for >25 years. I have a Bsc, MSc, and PhD in Wildlife Biology, with additional post-doctoral researcher positions. I became a Certified Wildlife Biologist with The Wildlife Society (TWS) in 2017, and have been an Associate Editor for the Journal of Wildlife Biology since 2017 as well. I am currently the Director of Research and Assistant Professor for a small, education-focused non-profit organization where I teach advanced population assessment and monitoring techniques, mostly to professional biologists. I am, however, speaking on my own behalf.

From the end of 2018 until May 2024, I was also the wildlife Research Coordinator for Region IV of ADFG-DWC. During this time, I had the pleasure of working with some excellent research biologists, nearly all of whom have left state service within the past two years. This includes Renae Sattler and Nick Demma, who led research on the Mulchatna caribou herd (MCH) and, in Nick's case, wolves in the vicinity of the MCH. I participated in this research in various ways, from helping to craft objectives and hypotheses, identifying appropriate sampling and analytical methods, field work including capturing adult and calf caribou, developing partnerships with other groups (e.g., UAA), and working with the DWC's Division Management Team (DMT) to identify the most pressing questions about MCH. I want to reiterate this last part as I continue to hear attacks from people who do not know better: the research being led by Nick and/or Renae was not only sanctioned by DWC, it was prioritized by the DMT.

With these facts in mind, it should be obvious that I have a unique and (to be blunt) very well qualified perspective on the recent history of the MCH. Particularly given my experience designing and executing large field-based projects to assess and monitor the demographics of large terrestrial mammal populations.

That all said, I am writing in the strongest possible opposition to RC009 and the ill-conceived, indefensible, and illegal predator control program it is attempting to reinstate. As I have little faith that this will ever be read, I will try to keep my specific points concise.

1) The population (abundance) objectives for MCH are meaningless. They are and always have been based on little more than guesses with zero data to back them up. They were first defined in 1987 during an exponential growth phase during which the population irrupted from <20,000 animals to the oft-cited 200,000 animals estimated to be in the herd in 1996. From 1998-2002 (~six years post-peak), the abundance objective was simply “>25,000 animals”. After the herd exceeded the carrying capacity of its range and abundance began to decline (following population dynamics that any 3rd year wildlife biology undergrad can explain), this objective was changed, without scientific justification, to 100-150,000 animals. Just six years later, objectives were changed, yet again, to the current target of 30-80,000 animals. Yet again with zero science to defend the change. When a career biologist who worked throughout the MCH range submitted a proposal to the BOG to reassess these objectives using at least some defensible information from an adjacent herd, it was rejected.

These arbitrarily-chosen objectives are at the heart of this issue, yet it rarely gets discussed. Without ANY defensible data to support these objectives, how can the BOG justify them and the actions that may come when they are not met?

2) This is not an emergency, and it took a real act of creativity to say it is. In fact, the abundance estimates for MCH have been incredibly stable for several years now – something that managers claim to aspire to yet often fail (e.g., Nelchina caribou). The closest thing ADFG has for data on the carrying capacity of the MCH range is, ironically, this stability and the fact that it aligns so closely with MCH abundance prior to the irruption. Again, how can ADFG/BOG claim to know what the abundance “should be” (see prior point) when there is zero defensible information on how many animals their range can support? This is a basic tenet of wildlife biology: without the food to support caribou, eliminating predators, disease, and/or parasites may not matter. Just like with humans. Problem is, no one has a clue what the range looks like to a herd of caribou. This is not an easy task. But it is entirely feasible and should have been initiated years ago when proposed by the research and management biologists who knew the situation best. It wasn’t.

3) There is zero defensible information on any of the three predator species involved with this program. None. Extrapolating brown bear density estimates from an adjacent area that were already more than a decade old prior to the start of bear removal is entirely inappropriate. I do not know a single objective biologist who would agree with this approach, and I said as much on numerous occasions while I was the Research Coordinator. Frankly, it is shocking to me. As was internal DWC “FAQ” documents that reported the upper end of the estimates from Pat Walsh’s research, which was clearly meant to bias people into believing there were as many bears out there as possible. Again, this approach at extrapolation would never be accepted by objective biologists or peer-reviewed journals. And that is the ‘best’ information on any of the three predator species. I know for a fact that multiple calls by informed members of the public to initiate a science review of the program were immediately dismissed by the commissioner. This reinforces popular belief that science, evidence, transparency, and accountability simply do not matter.

4) The obvious extension of the previous point is that the Superior Court of Alaska found this program to be illegal and void, in part due to the absence of defensible information on these predator populations. I attended the oral hearings in Anchorage on 3 March 2025 where I listened to the state’s thin claims about providing adequate notice and attempts to avoid acknowledging their failure to provide the data to support the program. Short of time-travel, it is literally and categorically impossible that any of these issues have been addressed in the 12 days since the judge’s ruling. I am appalled that ADFG is now attempting to circumvent the courts without making any good-faith efforts to address the failings identified in the ruling.

5) Further, this most recent effort to push this program through is beyond shameful. The public, who the BOG and ADFG are supposed to serve, was given less than one day to register to testify. Both registering and testifying had to be in person. How many residents of Ekuik or Koliganek or the other villages the BOG/ADFG claim to be so afflicted by the low MCH abundance (again, low relative to some fantasy of what the herd “should” look like) would be able to participate in this PUBLIC process? For a state that defines itself on being large and remote, this is an absolutely unacceptable practice.

6) In the RC009 document itself, it was stated, “Department-led efforts have resulted in positive growth in herd abundance and improved calf-to-cow ratios while not impacting the sustainability of regional wolf or bear populations. It is critical for the continued recovery of the herd to continue predator control efforts.”

I can not state this strongly enough: NO objective, knowledgeable, ethical biologist would ever make such statements. This is claiming CAUSATION, which is difficult to obtain with even well-designed, executed, and completed research – of which there is none on MCH or local predator populations. To

treat correlation as if it was causation is reckless, unprofessional, and clearly meant to misinform and manipulate anyone reading it.

I have seen many other cases of this form of propaganda while with, and since leaving, ADFG. Instead of pursuing and acquiring the information needed to determine the response of MCH to predator removal, the state makes its claims under the assumption that the public will believe them as the experts. Ideally, the public and the BOG would hear from all the experts (and anyone else wishing to testify). Instead, ADFG has censored its staff so that only one side of this story is told. As one example, the Director of DWC sent an email to the entire Division on 12 Dec 2024 stating, “When our participation in TWS might be in conflict with ADF&G policy or even *perceived* to be a conflict with policy decisions made by appointees, we must recuse ourselves” (his emphasis). If professional biologists are silenced, you may as well stop pretending that science, or scientific evidence, matters.

Regrettably, I was unable to make these and many other comments, observations, and questions in person. I am, however, extremely grateful for those who were somehow able to testify despite the situation created, which only serves to reinforce the judge’s ruling. I am also grateful for the many other professional biologists who have spoken out about this program, particularly given that current ADFG staff cannot. There is no legal, scientific, or procedural support for this program, and everyone knows it.

Thank you.

Jeff Stetz, PhD
26 March 2025