

I hereby submit a record copy in opposition to RC009, ADF&G's Emergency Petition for Intensive Management of Mulchatna Caribou Herd.

I find it inconceivable that ADF&G is totally ignoring the recent Alaska Superior Court decision finding that previous Proposal 21, which enacted the Mulchatna bear and wolf control program was "unlawfully adopted and, therefore, void and without legal effect." In Alaska and the United States as a whole, our democracy operates under the rule of law. Ignoring such court decisions is illegal and leads to authoritarianism. ADF&G is presenting to the Alaska Board of Game a similar Emergency Petition that totally fails to address the Alaska constitutional problems cited by the Superior Court in overturning Proposal 21. The same lack of research on sustainable bear numbers pertains to the current proposal.

I am very familiar with the extreme swing in population numbers for the Mulchatna Caribou herd. In the mid-1980s while working as a ranger for the National Park Service, I did the aerial photography that provided state biologist Ken Taylor with his base data for calculating the growth of the Mulchatna Herd. I personally witnessed and photographically documented the population explosion that led to an estimated peak of 200,000 caribou.

In personal discussions with Ken Taylor, I learned that bear and wolf predation impacted calf numbers, but when environmental conditions were favorable to caribou births, rapid population growth overwhelmed the ability of bears and wolves to depress calf recruitment. Ken believed that hard winters, especially those where winter rains created ice layers in the snow pack, could severely depress caribou numbers when the animals were unable to paw through the snow pack to reach winter feed.

Myriad ancient caribou trails carpeting the Mulchatna Herd's territory speaks to the herd having grown to huge numbers in the past, followed by periodic crashes to smaller numbers. Caribou numbers are highly variable, that's simply the biology of the species.

I've observed over the past forty years that climate change is rapidly altering the vegetation across the Mulchatna herd's range. Tundra consisting of lichens, blueberries, dwarf birch and low willows is being overgrown with taller willows, alder, cottonwoods and white spruce. The lichens and plants most desired by caribou are being replaced by vegetation more favorable to moose.

In the 1970's I graduated from the University of Michigan with a degree in Natural Resources. In our wildlife biology classes we were taught the benefits of diversity in natural ecosystems. Predators like bears and wolves were important to the health of prey species like caribou. Killing off all predators to support unnaturally high ungulate numbers was antiquated wildlife biology from the 1920s and earlier. In Yellowstone National Park, the extirpation of wolves and mountain lions led to unnaturally high populations of elk, bison and mule deer that heavily overgrazed the park's vegetation. Wildlife biologist came to recognize the importance of predators in a balanced ecosystem. Ken Taylor was instrumental in live trapping wolves in the Rocky Mountains of Alberta and reintroducing them into Yellowstone. Today, the park has returned to a considerably healthier ecosystem.

Much of the Mulchatna Caribou Herd range includes federal lands in Togiak National Wildlife Refuge and Lake Clark National Park and Preserve. Aerially gunning down all bears and wolves is a total antithesis to the sound wildlife biology practices of the U.S. Fish and Wildlife Service and the National Park Service. ADF&G has failed to provide any scientific research on the biological effects of eradicating all the bears and wolves in parts of the Mulchatna Caribou Herd range. And besides the lack scientific study, the ethics of fair chase is totally ignored by ADF&G when promoting same day airborne killing of predators.