



# THE WILDLIFE SOCIETY

## ALASKA CHAPTER

*The Alaska Chapter of the Wildlife Society strives to enhance the ability of wildlife professionals to conserve biological diversity, sustain productivity, and ensure responsible use of wildlife resources in Alaska for the benefit of society.*



March 24, 2025

Hon. Jake Fletcher  
Chair, Alaska Board of Game

### **RE: Alaska Chapter of The Wildlife Society concerns regarding RC009 timing**

Dear Alaska Board of Game members,

The Alaska Chapter of The Wildlife Society (TWS) is a professional society founded in 1971. With over 200 members, the Alaska Chapter is one of the largest chapters of The Wildlife Society, an international organization representing wildlife biologists and managers employed by state, federal, and borough resource agencies, academic institutions, non-governmental conservation organizations, and private industry. Our science-based mission is to enhance the ability of wildlife professionals to conserve biological diversity, sustain productivity, and ensure responsible use of wildlife resources in Alaska for the benefit of society.

RC009 presents a petition for Intensive Management of the Mulchatna Caribou Herd (MCH). Our understanding is that this petition stems from a recent court decision that identified two main deficiencies in the original MCH Intensive management program (1) inadequate public notice of board-approved bear control, and (2) failure by the Department/Board to adequately evaluate the sustainability of bear populations in light of this control.

The Alaska Chapter of TWS has a professional interest in use of the best available scientific information to guide management decisions and actions. This includes opportunity for public engagement and comment. Substantive scientific comment requires access to any reports and new data the department has gathered, and adequate time for drafting a science-based analysis and recommendation, with internal peer review. This is a process that requires more time. Because of this we are greatly concerned about the rapidity with which RC009 has been proposed and is being considered. There is insufficient time for our organization to meaningfully review the proposed action and to submit written comment or testimony. **We ask that the board defer its decision on RC009 to allow more robust review and commenting by the public.**

The Chapter is in early stages of internal discussion about historic and expected impacts of intensive management actions on the MCH. In addition to greater time to enable this process to proceed in a robust manner, we are also interested in reviewing any new analysis regarding the sustainability of the bear populations in light of past and planned lethal control.

We thank you for your consideration and hope that you will provide the public the information and the time necessary to provide robust comments and recommendations.

On behalf of the membership of the Alaska Chapter of The Wildlife Society,

Ryan Mollnow

President, Alaska Chapter of the Wildlife Society