ACR #4 – Add wolves back into the Mulchatna Caribou Herd Intensive Management plan so they can be removed if and when appropriate as part of the active IM program.

CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD.

5 AAC 92.111(c) Intensive Management Plans I.

WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM.

The portion of the Mulchatna Caribou Herd (MCH) Intensive Management (IM) plan that included wolves was invalidated by the Alaska Superior Court in March 2026 after the court identified deficiencies in the 2022 board record. Based on the results of updated research, the department would like to add wolves back into the IM plan so they can be removed if and when appropriate as part of the active IM program to restore the abundance of the MCH.

WHAT SOLUTION DO YOU PREFER?

(c) Mulchatna Caribou Herd Predation Management Area. The Mulchatna Caribou Herd Predation Management Area is established to increase the Mulchatna Caribou Herd (MCH) within Units 9(B), 17(A), 17(B), 17(C), 18, 19(A), and 19(B) to aid in achieving intensive management (IM) objectives. The Mulchatna Caribou Herd Predation Management Area encompasses approximately 39,683 square miles, and multiple predator control areas may be utilized within the management area. The control program for this area is as follows:

(1) this is a continuing control program that was first established by the Board of Game (board) in 2011 for wolf control that was expanded in 2026 to include black and brown bear control; it is designed to increase the caribou herd's population size and human harvest by reducing wolf and bear predation on caribou and is expected to make a contribution to achieving the IM objectives for the Mulchatna Caribou Herd.

(2) caribou, black bear, brown bear, **and wolf** objectives are as follows:

…

(C) **the wolf population objective for the MCH Predation Management Area is to annually reduce the number of wolves in predator control areas to a level that results in increased calf survival and recruitment while maintaining the viability of the wolf population;**

(3) findings concerning populations and human use are as follows:

(B) wolves are a major predator of caribou in the range of the MCH and are an important factor in failing to achieve these objectives;

(C) a reduction of wolf predation can reasonably be expected to aid in achieving

the objectives;

(D) reducing wolf predation is likely to be effective and feasible using recognized and prudent active management techniques and based on scientific information;

(E) reducing wolf predation is likely to be effective given land ownership patterns;

(F) reducing wolf predation is in the best interests of subsistence users;

(4) authorized methods and means are as follows:

(A) hunting and trapping of **wolves and** bears by the public in the MCH Predation Management Area during the term of the program will occur as provided in the hunting and trapping regulations set out elsewhere in this title, including the use of motorized vehicles as provided in 5 AAC 92.080;

(B) **notwithstanding any other provisions in this title, the commissioner may issue public aerial shooting permits or public land-and-shoot permits as a method for wolf removal under AS 16.05.783;**

(C) notwithstanding any other provisions in this title, the commissioner may allow department employees to conduct aerial, land-and-shoot, or ground-based lethal removal of **wolves**, black bears, and brown bears using state-owned, privately-owned, or chartered equipment, including helicopters, under AS 16.05.783;

(5) time frame is as follows:

(A) through June 30, 2028, the commissioner may authorize the removal of bears and wolves in the MCH Predation Management Area;

(B) annually, the department shall, to the extent practicable, provide to the board a report of program activities conducted during the preceding 12 months, including implementation activities, the status of caribou **and wolf** populations, and recommendations for changes, if necessary, to achieve the objectives of the plan;

(6) the commissioner will review, modify, or suspend program activities as follows:

…

(B) **if, after three years, the harvest of wolves is not sufficient to make progress towards the IM population objectives for wolves;**

….

STATE IN DETAIL HOW THIS ACR MEETS THE FOLLOWING CRITERIA:

To correct an error in regulation.

No.

To correct an effect of a regulation that was unforeseen when a regulation was adopted.

No.

Does the request identify a biological concern for the population or a threat to meeting objectives for the population?

Yes. The department was unable to remove wolves that were actively preying on the MCH when conducting predator removal efforts this spring, and the public was unable to participate in the public wolf removal portion of the program. While conducting bear removal activities this spring, 3 wolves and the tracks of 2 packs of approximately 6 wolves each were observed on the calving grounds but not pursued. In addition, at least 2 adult caribou and 5 caribou calves were killed by wolves during this period. The MCH is below population objectives and the inability to take wolves as part of the predator removal program is contradictory to the department and Board of Game's intent of restoring a harvestable surplus of the herd as quickly as practicable.

Does the request identify an unforeseen, unexpected event or effect that would otherwise restrict or reduce a reasonable opportunity for customary and traditional wildlife uses, as defined in AS 16.05.258(f)?

Yes. Removing wolves as part of the IM program due to a court finding was unforeseen and affects the board's ability to provide for reasonable opportunity for customary and traditional wildlife uses of the MCH

Does the request identify an unforeseen, unexpected resource situation where a biologically allowable resource harvest would be precluded by delayed regulatory action and such delay would be significantly burdensome because the resource would be unavailable in the future?

Yes. Not being able to remove wolves as part of the IM program delays the recovery of the herd needed for a harvestable surplus sufficient to allow for customary and traditional use of the population.

WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

Any delay in the ability to remove wolves is undesirable, and having to wait until the regular cycle will further delay potential removal of wolves by 2 years.

STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.

This request is not allocative.

IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF

THE REGULAR CYCLE.

This request is not allocative.

STATE YOUR INVOLVEMENT IN THE ISSUE THAT IS THE SUBJECT OF THIS ACR.

Alaska Department of Fish and Game.

STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF GAME MEETING.

This ACR has not been considered before.