

April 5, 2016

The Honorable Sally Jewell
Secretary of the Interior
U.S. Department of the Interior
1849 C St., NW
Washington, DC, 20240

The Honorable Dan Ashe
Director of the U.S. Fish and Wildlife Service
U.S. Department of the Interior
1849 C St., NW
Washington, DC, 20240

Public Comments Processing
Attn: FWS-R7-NWRS-2014-0005
Division of Policy, Performance, and Management Programs
U.S. Fish and Wildlife Service
MS: BPHC
5275 Leesburg Pike
Falls Church, VA 22041-3803

Re: Proposed Regulations, National Wildlife Refuges in Alaska, RIN 1018-BA31, 81 Fed. Reg. 887 (Jan. 8, 2016)

Dear Secretary Jewell and Director Ashe,

We, the undersigned organizations that represent millions of sportsmen-conservationists, are concerned by the U.S. Fish and Wildlife Service's (FWS) plans to finalize proposed regulations pertaining to the "non-subsistence take of wildlife, and public participation and closure procedures on National Wildlife Refuges in Alaska." We strongly recommend that the FWS refrain from finalizing these regulations. Instead, the FWS should re-engage in discussions with the Alaska Department of Fish and Game (ADF&G) and the Alaska Board of Game (BOG) concerning the management of wildlife on National Wildlife Refuges. The FWS should make no modification to existing rules until the FWS finds a solution that achieves a compromise that addresses if not achieves the management goals of both federal and state managers.

Alaska's National Wildlife Refuges Should Not Be Managed for Natural Diversity

The proposed FWS regulations rely on the agency's alleged obligation to manage for "natural diversity" on Alaska's refuges. Under this approach, the FWS would allow wildlife populations to "blink out" rather than intervene to protect them from predation by other species. The "natural diversity" management approach particularly threatens Alaska's prey populations that are already suffering the effects of the presence of strong populations of predators, such as wolves. This approach not only conflicts with the purposes for which many Alaska wildlife refuges were established, but undermines the conservation priorities identified in the National Wildlife Refuge System Improvement Act (NWRISIA). In adopting NWRISIA, Congress made wildlife-dependent recreation a priority for refuge management. The more diverse the wildlife, the more wildlife-dependent recreational the public has to enjoy. All wildlife-dependent recreation, both consumptive and non-consumptive, benefits from the presence of a full diversity of

wildlife species, rather than the presence of only predator populations. All National Wildlife Refuge users, including hunters and those who only wish to view and listen to wildlife, will enjoy a fuller refuge experience when there is a broader range of wildlife to experience.

Hunting Regulations on National Wildlife Refuges In Alaska Should Not Undermine State Management Authority

The proposed regulations also set a disturbing precedent for the relationship between federal and state wildlife managers concerning populations that exist on both federal and state lands. The proposed rules appear to be designed as if the wildlife on National Wildlife Refuges is unrelated to the wildlife on state lands. In reality, federal and state managers share responsibility for many populations that migrate or roam back and forth between federal and state land and do not respect artificially drawn federal/state boundaries.

By rejecting the state's decision-making, the FWS not only contradicts the state's means of fulfilling its statutory management obligations for providing subsistence and non-subsistence resources to its hunting public, it also jeopardizes the state's need to maintain healthy wildlife populations. States are a crucial partner in the federal government's ability to manage wildlife on federal lands. Instead of ignoring state decisions, the FWS must find common ground where federal and state managers can work together, to achieve their mutual goals. The FWS should strive to reach agreement with state managers that will achieve the purposes of the refuges at issue and at the same time ensure that Alaska state wildlife managers remain able to meet their state constitutional and statutory mandates concerning the state's management of its resources and the provision of hunting opportunities for all Alaskan hunters.

The undersigned organizations strongly urge the FWS to refrain from taking steps to finalize the proposed regulations. Instead we request that the FWS re-engage in discussions with state management authorities until a reasonable compromise with the State of Alaska can be achieved.

Sincerely,

Safari Club International
Archery Trade Association
Boone and Crockett Club
Camp Fire Club of America
Congressional Sportsmen's Foundation
Conservation Force
Council to Advance Hunting and Shooting Sports
Delta Waterfowl
Ducks Unlimited
Houston Safari Club
Masters of Foxhounds Association

Mule Deer Foundation
National Rifle Association
National Shooting Sports Foundation
National Trappers Association
Orion The Hunter's Institute
Pope and Young Club
Professional Outfitters and Guides of America
Quality Deer Management Association
Rocky Mountain Elk Foundation
Ruffed Grouse Society
Sportsmen's Alliance
Texas Wildlife Association
Whitetails Unlimited
Wild Sheep Foundation
Wildlife Forever