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Representative Tom McKay  
Chair, House Resources Committee  
33rd Alaska State Legislature

Re: Support for House Joint Resolution 10 NAT'L PARK SERVICE; HUNTING IN PRESERVES

March 8, 2023

Dear Representative McKay, and members of the House Resources Committee,

The Safari Club International Alaska Chapter supports House Joint Resolution 10 NAT'L PARK SERVICE; HUNTING IN PRESERVES.

Founded in 1971, Safari Club International is the country's leading hunter rights advocate and additionally promotes worldwide wildlife conservation. SCI's approximately 50,000 members and 200 Chapters represent all 50 of the United States as well as 106 other countries. The Safari Club International Alaska Chapter (SCI-AK) is a 501c4 conservation non-profit Corporation established in Alaska in 1977. We currently have 670 members. Our mission statement is "First for Hunters - First for Wildlife."

House Joint Resolution 10 (HJR 10) urges the National Park Service (NPS) to withdraw the proposed "2023 NPS Rule" without adoption. The resolution's language further affirms the mandates of the previous 2020 national preserves rule; which did not seek to preempt state management authority of wildlife on federal public lands. The 2020 NPS Rule better aligned NPS's regulations with the state's laws for hunting and trapping in national preserves in Alaska. The 2023 Rule was proposed without consultation with the Alaska Department of Fish & Game, and is substantially similar to a 2015 NPS rule prohibiting select hunting practices and management techniques on national refuges.

Hunting, fishing, and trapping are methods of harvesting wildlife by the public and are specifically authorized activities under ANILCA in Alaska national preserves. Section 1313 of ANILCA establishes the extent to which NPS has authority to restrict the take of fish and wildlife, and explicitly does not provide NPS with authority to regulate the "methods or means" for harvesting—those practices are governed by the State.

Alaska is facing unprecedented pressure from the federal government to control access and resources on lands that Congress intended to be used by the state's residents. The proposed 2023 NPS Rule would further erode the state's ability to ensure Alaskan interests are able to make a living, engage in commercial and traditional hunting practices, and continue utilizing national preserve lands in a responsible and respectful manner—as they have done for generations.

We thank Representative Cronk for introducing HJR 10 and offer our full support for this valuable piece of legislation.

Best regards:

***John Sturgeon***

**SCI Alaska Chapter President**

E-mail: [frontiertradellc@aol.com](mailto:frontiertradellc@aol.com)

Cell: (907) 230-0072

Senate Resources Committee,

My name is Joey Klutsch and I am a second generation hunting guide. I am a rural resident of King Salmon, AK, and I have lived here my entire life. I've been involved in the guiding business for the whole of my working life and have been going to guide camp from the time I could walk. I first earned my guide license 20 years ago, and have operated my own guiding business since 2014. Guiding is and always has been nearly my entire means of income. I am not a part time guide. I am a professional. Guiding is a way of life for me, a job that a truly love and care about, and one that allows me to provide for my family (both from the money I bring in and the meat I take home) in a sustainable way. I hope to someday get my two children involved in guiding. In addition to being my primary means of income, guiding is also extremely important for those who I hire to work with me, nearly all of whom live in Alaska. And the economic effect trickles down from there, especially in rural communities like mine. Air Taxis, stores, hotels, restaurants; all of them depend a great deal on the influx of out of state hunters, which happens during a time that is otherwise void of tourists, and which were it not for hunters, would have far less economic opportunity for those who operate and live in these communities.

Much of the guiding that I do (and which many others do) takes place on National Park Preserves, for brown bear and wolf, so should the proposed NPS rule go into effect, it would greatly affect me, my family, and those who work with us, many of whom have been guiding with us for 20 years or more. My dad, Joe Klutsch, has been guiding in what is now Aniakchak Preserve since the early 1970s. His guiding main camp is located directly in Aniakchak Preserve and he has held an NPS concession contract to guide there since the early 1980s. This is a huge part of his business. He has spent most of his working life guiding in this Preserve. I guide for him in this area, so naturally a closure of brown bear and wolf hunting would affect me greatly, as a very significant portion of the hunters he takes in Aniakchak Preserve are for brown bear. Obviously, it would affect him tremendously. I hope to someday acquire this area from him, and it has long been my goal, but the area would lose most all of its value should brown bear hunting be closed. Furthermore, many resident Alaskan hunters enjoy hunting brown bears and wolves not just in Aniakchak Preserve, but all of the National Preserves throughout Alaska. It is not fair that resident hunters lose out on hunting opportunity, especially where there is absolutely no biological concern for these species, and no reasonable justification whatsoever for closure. This is simply another example of federal agencies asserting themselves by attempting to manage what is a state resource. And again, with zero biological justification for doing so.

Much of GMU 9 has been listed as a predator management area for wolves due to the extremely abundant populations of these highly efficient predators. They take a large toll on prey species. You cannot blame the wolves for doing what they do, but at the same time you absolutely cannot expect to take them out of the management equation by forbidding hunting of them on Preserve units. Predators such as brown bears and wolves should not be given any elevated status amongst animals when there is a harvestable level of them to be taken. The Alaska Board of Game sets season and bag limits for these animals and it is not the place of the National Park Service to usurp the BOG, especially when the seasons and bag limits set by the BOG are based largely on biological evidence and data.

Furthermore, closure of hunting of these predator species could, and likely would, adversely impact subsistence users in the area. Hunting for food may not be important in Washington DC and other major population centers where NPS policy makers come up with these ideas, but it is very important in rural Alaska where I live, and across countless communities and villages like it, many of which are in close proximity to National Preserves (the communities of King Salmon, Naknek and South Naknek are right next to Katmai Preserve, and this area is hunted for subsistence by me and many other locals from the area) . The elimination of hunting for the two major predator species (wolf and brown bears) would surely be detrimental to the game in the area, which is game that rural residents of the area subsist on and have done so for thousands of years. I doubt that most of the Park Service authorities who proposed this rule have any idea that brown bears can kill up to 70% of moose calves born, or that wolves can tear down a similar number of caribou calves. I am not saying that bears and wolves don't have their place. Quite the opposite. They are a vital part of the ecosystem. But there is no logical reason that we should not be able to harvest them when their numbers are healthy, which they are, and when the Alaska Board of Game sets seasons and bag limits for doing so. The state of Alaska does a fine job of managing its game through the Board of Game process – a process open to the public. It has proven itself for many years. We do not need the federal agencies overruling seasons that are in place and work extremely well.

Finally, I would like to comment regarding the lack of notice to the general public regarding this extremely serious NPS rule, especially in rural Alaska. As someone who actually lives year round in a rural AK, in a community that is a short snowmobile or boat ride from Katmai Preserve where locals routinely hunt and subsist, and that is within relative proximity of two other Preserves (Lake Clark and Aniakchak Preserves), I find it particularly alarming that no one that I have spoken with in my community, including members of our Naknek/Kvichak Advisory Committee (of which I am a member of) have heard of this rule, which could potentially affect them so greatly. This is absolutely inexcusable and just illustrates perfectly how NPS does not care about local members of these rural communities, the very people who this could potentially affect the most. This is completely unfair to the everyday person who lives in these communities, who does not have time or even know about checking the Federal Register online to find out about things like this that greatly affects their way of life. There are no notices to the public in our community; nothing in public places like the Post Office, stores, or bank where people of the community can go to find information. NPS didn't even bother to post anything online, for example, Facebook groups such as the Bristol Bay Exchange, where community information and public notices are regularly shared. And this is in a community that is in direct proximity to a preserve where locals hunt and subsist! This is inexcusable and shows a complete lack of understanding, care, and utter disregard for the way of life people value so much in rural areas. This is in no way a public process because most people don't even know that it is happening, and NPS is making no effort to inform them, much less ask for comments from those affected. How is that in anyway a democratic process?

I thank you for your time and effort in this matter.

Sincerely,

Joey Klutsch  
Registered Guide 1277  
Aniakchak Guide Service

## Ed King

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**From:** Jeff Pralle [REDACTED]  
**Sent:** Saturday, March 11, 2023 7:23 AM  
**To:** J Pralle  
**Subject:** National Park Service Rule on predator hunting  
**Attachments:** SJR008A.PDF; Untitled attachment 00023.htm

Hello I am Jeff Pralle a nearly life-long Alaskan. I first moved to Alaska in 1975 it is my home. I am Alaska Master Guide/Outfitter #128 I am a small business owner with 2 companies and 8 employees most are local resident Alaskans. The ruling by the National Park Service will have a direct impact upon both my guiding and outfitting company and my aircraft maintenance business.

### **I Oppose the National Park Service ruling to close predator hunting on National Preserve Lands.**

Closing predator hunting on the Lake Clark and Denali National Preserves that border my hunting area on the North and South will have negative effects on the game populations in my hunting area on State Land. Not only will we see lower calf survival but I anticipate increased hunting pressure on the areas bordering the Preserves placing pressure on the game I hunt. If this takes place I will be forced to take measures to offset this. Possibly reducing the size of my staff and cutting jobs.

It will also have a negative effect on the Dall Sheep populations in the area, which are at historic lows, due to increased predation from a lack of predator management. Slowing the recovery of a valuable resource for local food procurement and revenue from hunters using local services to access the Preserve and the nearby communities and villages. We rely upon hunting predators to help make our annual income. Local subsistence users will suffer lower opportunities as well due to lower ungulate populations.

I support local management by the State of Alaska. We have a great system that is in touch with local game populations and issue to manage our wildlife resources. Our Advisory Councils and Board Of Game are designed to take local knowledge and use it to implement regulations for maximum sustained yield of all species. Subsistence is valued and given priority. Helping rural Alaskans feed their families.

My personal impacts will be:

- Increased predators on Preserve Lands bordering my hunting area. I have been guiding there since the mid 1980s. Reducing the number of calves that survive. Lowering the number of ungulates. Causing me to reduce the number of hunters and the number of people I employ.
- Increase in hunting pressure in the surrounding area outside the preserve.
- Financial impacts to my aircraft maintenance customers that hunt and guide on preserve lands. Reducing their need for my services.
- Reduced purchase and use of locally supplied parts, fuel, groceries, dry goods, fuel, jobs and services due to a reduction in availability to hunt on National Preserve Lands.
- Reduced opportunity for taking subsistence harvests for the villages near my hunting area.
- This will affect my family and many others in Alaska.

In Summary:

I believe this proposed regulation change is unnecessary. A direct attack on States Rights in Alaska. That will have long lasting negative impacts on my home and my business. Alaska Game Management is Alaskans business. We deserve to have our fish and game managed for all Alaskans to benefit subsistence, recreational, and commercial uses.

Sincerely,

Jeffory K Pralle

Alaska Master Guide Outfitter GUIM128

## Ed King

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**From:** Jay H. Stanford [REDACTED]  
**Sent:** Friday, March 10, 2023 10:49 AM  
**To:** House Resources  
**Subject:** Approval for Senate Joint Resolution No. 8

Dear House Resources,

My name is Jay Stanford and I am writing you today to express approval for Senate Joint Resolution No. 8 that disapproves of the proposal by National Park Service (NPS) that limits hunting methods on Alaska National Preserves. I am an Alaskan Native and have spent a large part of my life on National Preserves. I spent childhood summers with grandparents, former Governor Jay and First Lady Bella Hammond, at their homestead in Lake Clark National Preserve. I began guiding in 2013 and received my registered guides license in 2017. I have done the majority of my guiding on National Preserves and National Refuges, including Wrangell St Elias National Preserve, Katmai National Preserve, and Kodiak National Wildlife Refuge. I guide for my father-in-law Paul Claus, who has three federal concessions in the Wrangell St Elias National Preserve. The Claus Family had been guiding in the Wrangell's for decades before the park system was established. This proposed rule will not only negatively affect all Alaskans and the wildlife of Alaska, but it threatens to break down our State rights.

If this regulation goes into affect it will quickly close down all predator hunts on National Preserves. This will have a negative economic affect on many rural areas. Some operators that do sustainable bear hunts on preserves will immediately be shut down and the thousands of dollars they bring into rural areas will be gone. Not only will those guided hunts be gone, the resident opportunity to hunt predators will be gone. Without sound predator hunting, predator numbers will start to get out of hand and prey species populations will start to suffer. First the general hunting for ungulates will go away and then the rural subsistence will go away because there won't be sustainable numbers for sustainable harvest.

Alaska already has a wildlife management system that works; The Alaska Board of Game. This board is made up of Alaskans from different backgrounds and from all over the State. They hear public comments and concerns and are able to use this information to make sound management decisions that benefit both the people and wildlife. Closures are made due to biological concerns, not emotional ones. They take in consideration for all users, especially subsistence users. Alaska's wildlife should be managed by people in Alaska.

If this proposal by NPS goes through, not only will I be immediately negatively affected, but my friends and colleagues that operate sustainable predator hunts on Alaska National Preserves will be out of business. And not because of a biological concern, but because someone out of the state is wanting to shut these sustainable hunts down for no reason. So because of these concerns I hope you support Senate Joint Resolution No. 8 and leave the management of Alaska's Wildlife too Alaska.

Sincerely,

Jay H. Stanford  
Alaska Registered Guide/Outfitter #117647  
Alaska Professional Hunters Association Board Member  
[REDACTED]