



SCI Alaska Chapter
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Senator Cathy Giessel, Senator Click Bishop
Co-chairs, Senate Resources Committee
33rd Alaska State Legislature

Re: Support for Senate Joint Resolution 8 NAT'L PARK SERVICE; HUNTING IN PRESERVES

March 6, 2023

Dear Senators Bishop, Giessel, and members of the Senate Resources Committee,

The Safari Club International Alaska Chapter supports Senate Joint Resolution 8 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."

Senate Joint Resolution 8 (SJR 8) 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 Senator Giessel for introducing SJR 8 and offer our full support for this valuable piece of legislation.

Best regards:

John Sturgeon

SCI Alaska Chapter President

E-mail: frontiertradellc@aol.com

Cell: (907) 230-0072

The imperiled right to manage our wildlife in Alaska

John Sturgeon
Mar 13, 2023

Some Alaskans might remember the story of my long struggle against the National Park Service that was ultimately heard twice by the U.S. Supreme Court (Sturgeon v. Frost I & II — I won unanimously). My experience taught me about the power of federal agencies, the cynical perspective some bureaucrats have toward Alaskans, and the promises Congress made to us to protect our way of life. I say this knowing that some of you reading this are fatigued by the repeated cries to “stop federal overreach.” My fellow Alaskans, I urge you to learn about the latest federal actions that are destroying the Alaskan way of life.

This spring, the 9th Circuit Court of Appeals issued a decision that, if upheld, squashes Alaska’s equal footing with the other 49 states by extinguishing our right to manage wildlife on federal units within our borders. In a published decision, the court struck with judicial lightning: “We hold that ANILCA preserves the federal government’s plenary power over public lands in Alaska.” With one sentence, the Alaskan public’s access to — and participation in — game management decisions on federal land were extinguished. Now, the National Park Service (NPS), recently empowered by the Kenai Refuge decision, seeks to eviscerate state wildlife management on its preserves. We now stand as the only state that does not have management authority over all our wildlife resources! That 9th Circuit decision is currently being appealed to the U.S. Supreme Court.

Alaska’s system of wildlife management is one of the most accessible and public wildlife management processes in the United States. Alaska’s Constitution is strict in that conservation and “sustained yield” harvests must occur for all fish and wildlife — including both predators and food animals. The Alaska Constitution empowers the state Legislature to make allocation decisions.

From top to bottom, Alaska’s system of game management is designed to be accessible and responsive to Alaskans. Not so with the federal management system.

Alaska's — now imperiled — public game management system was developed as a reaction to Territorial days, when devastating management and allocation edicts were handed down by D.C. bureaucrats with little to no understanding of what Alaskans' needs were. Before statehood, federal agents poisoned predators and enforced race-based exclusions against Alaska Natives, while simultaneously sanctioning corporate-owned fish traps and predator bounties that created conservation disasters. The federal side is still detached from fish and wildlife conservation — they are still ignoring Alaskans and they are still willing to attack indigenous hunting traditions. In 2015, NPS steamrolled over the nearly unanimous Subsistence Resource Advisory Committee's (RAC) opposition to essentially the same rule they have offered again in 2023. Alaskan RACs identified that the NPS efforts to prohibit all predator hunts, by labeling regular hunts as "predator control," would crush food security in Alaska. Their justification being that the bans do not close hunts for rural Alaskans even as they admit there will be less food animals for locals to hunt and eat as a result.

The 9th Circuit has laid the way and now NPS seeks to occupy and control what they see as theirs. It is time put our differences aside and resist the federal government's attempt to steal what Congress gave us in 1959: the right of Alaskans to manage our wildlife.

John Sturgeon has been an advocate for states' rights and active in wildlife management issues for many years. He serves on numerous boards that advocate for the scientific management of Alaska's wildlife on a sustained yield. He is currently president of the Alaska Chapter of the Safari Club.

To: All representative and senators of the Alaska Legislature – March 16th, 2023.

My name is Wayne Kubat and I have lived in Alaska full-time since 1976 and have been hunting and fishing here since I first became a resident the following year. I have lived near Wasilla since 1984. I started assistant guiding in 1981, and also bought my own Piper Cub and started flying that same year. I earned my registered guide license in 1986, started my own big game guide service in 1987 – Alaska Remote Guide Service, and obtained my Master Guide license in 2004. I mainly guide for moose, brown bear and dall sheep. I've guided in Denali Preserve since 1986 and have had a sole use guide concession there since 1988. My current term ends in 2027. I served on the Mat-Su advisory committee from 1998-2007 and was the chair for several of those years. I have served on the board of directors for Alaska Professional Hunters Association (APHA) since 2012 and as Vice President for the past 7 years or so.

I strongly support Senate Joint Resolution Number 8 and House Joint Resolution number 10, which oppose the New 2023 Rule proposed by the National Park Service, and urge you to pass both promptly.

Should the new 2023 proposed NPS rule take effect, it will directly and negatively impact my business and also subsistence and sport hunting in the preserve and on neighboring state land where I guide and hunt personally. When I started my business in the Mid 1980's, there were abundant populations of moose, dall sheep and brown bear, but not very many wolves. Due to animal rights initiatives and Governor Knowles closing same day hunting for wolves in the early to mid-90's, wolf populations exploded in just a short time and my area was mostly shut down to moose hunting in the late 90's and early 2000's. I'm relating this from memory, but I believe it was in the early 2000's when Denali Preserve did a moose survey in the whole SW Preserve and only counted 14 moose, where in the mid 80's, there had been several hundred, and by my estimates most likely close to a thousand or more. The only wild meat available to one of my guides who lived in Skwentna at the time was black bear. My area does not have caribou and moose were almost non-existent at that time.

Due to intensive management and predator control efforts on State lands for brown and black bear and wolves in the early 2000's, moose populations had mostly recovered prior to 2019-20, but then a couple hard winters occurred shortly after that. There was a better and faster recovery on state land where the efforts took place, but the federal preserve to the north also benefited, because many brown bears and wolves travel back and forth between the preserve and state land. I strongly feel that there would have been little or no recovery on preserve lands had it not been for management efforts initiated by the state on neighboring state land. People who live in the area now have a reasonable chance to harvest moose again.

With that said, I think the situation is again deteriorating rapidly, even though there are year-round brown and black bear seasons and liberal harvest quotas. The Intensive management effort on wolves in GMU 16B was suspended, and wolves have come back strong, and along with healthy populations of bear and the recent bad winters, moose populations are currently experiencing very poor calf recruitment and are rapidly declining.

With the NPS opposition to managing predators, I expect the new rule will result in severe federal restrictions and even closures to current bear and wolf seasons in the preserve, and the moose population will remain in free fall. Aggressive management on state land to the south, may help some in the preserve, but not a lot. Food security will again decrease for Alaska residents due to scarcity of moose.

I would much rather have the state of Alaska manage our wildlife than bureaucrats in Washington and extremely well-funded and anti-Alaska animal rights and anti-hunting NGOs. I again urge you to support Senate Joint Resolution Number 8 and House Joint Resolution number 10, which oppose the New 2023 Rule proposed by the National Park Service.

Wayne Kubat dba Alaska Remote Guide Service

PO Box 874867

Wasilla, Alaska 9968

907-376-9568

Anne Rittgers

From: Senate Resources
To: Anne Rittgers
Subject: RE: New Pom:Fish & Game (game)

-----Original Message-----

From: poms@akleg.gov <poms@akleg.gov>
Sent: Thursday, March 16, 2023 9:24 AM
To: Sen. Click Bishop <Sen.Click.Bishop@akleg.gov>
Subject: New Pom:Fish & Game (game)

Franc Wright
1180 Float Rd

Fairbanks 99709-7202,

I would like to voice my support for the passage of HJR 10 and SJR 8, thank you.

From: [Sen. Cathy Giessel](#)
To: [Julia OConnor](#)
Subject: FW: New Pom:Fish & Game (game)
Date: Wednesday, March 15, 2023 10:50:36 AM

-----Original Message-----

From: mjensen@alaska.net <mjensen@alaska.net>
Sent: Wednesday, March 15, 2023 9:17 AM
To: Sen. Cathy Giessel <Sen.Cathy.Giessel@akleg.gov>
Subject: New Pom:Fish & Game (game)

Michael Jensen
4681 Southpark Bluff Dr

Anchorage 99516-4864,
mjensen@alaska.net
907-229-3173
same

As a lifelong resident of 55 years and avid sportsman I support the passage of HJR 10 and SJR 8. Thank you,
Michael Jensen

From: [Sen. Cathy Giessel](#)
To: [Julia OConnor](#)
Subject: FW: Comment on senate resolution no. 8
Date: Tuesday, March 14, 2023 9:24:24 AM

-----Original Message-----

From: Will Koehler <wrangelloutfitters@gmail.com>
Sent: Tuesday, March 14, 2023 9:23 AM
To: Sen. Cathy Giessel <Sen.Cathy.Giessel@akleg.gov>
Subject: Comment on senate resolution no. 8

Senator Giessel,

I am writing to express my very strong support for the senate joint resolution that opposes the new NPS proposed rule to eliminate hunting of predators on NPS lands.

I have supported my family and provided consistent employment to Alaskans for the last 15 years by owning an outfitting business in the Wrangell St. Elias National Park/Preserve. I am proud of the business I have built and the service that I provide. This business (and thus my family and my employees) will certainly be very negatively affected by this proposed rule.

Underneath all the arguments being made for and against the NPS proposed rule are fundamentally opposing views on the value of human beings. One view sees human beings as an undeniable part of the environment and one view sees human beings as a cancer on the planet. One view is nuanced and realistic, the other view has all the closed minded religious zeal of a holy warrior, with the unclean enemy being humanity itself. By the nature of its mandates, the NPS attracts the most left leaning and environmentally extreme people from our society. When, these people come together to make policy in the echo chamber of their agency, what comes out are proposed rules that have as their ultimate objective the removal of human beings from the landscape. This proposed rule is inline with that overall objective.

Fundamentally, this proposed rule is not the result of a different but equally valuable viewpoint. Though the rule is superficially tame in comparison to the belief system that brought it forth, it is the result of a genocidal and hate-filled worldview and should be opposed at every opportunity.

Much of your duties as publicly elected officials are to manage and organize. It is not often that you get the privilege to actually be on the front lines fighting against evil. The senate resolution no. 8 opposing the NPS proposed rule is one such opportunity.

Thank you for your service.

Will Koehler

Will Koehler
wrangelloutfitters@gmail.com
[https://urldefense.com/v3/_http://Wrangelloutfitters.com_!!LdQKC6s!PtveXPrOYFcbh-BZgz_oRuEuXM48HGaiM7lsPtqbf4Mrk87w8UITArOZuZB8jY_LCjj5jrOa3Gx9W73DRdLY4HxZnrJFK7RNj9huqg\\$](https://urldefense.com/v3/_http://Wrangelloutfitters.com_!!LdQKC6s!PtveXPrOYFcbh-BZgz_oRuEuXM48HGaiM7lsPtqbf4Mrk87w8UITArOZuZB8jY_LCjj5jrOa3Gx9W73DRdLY4HxZnrJFK7RNj9huqg$)
Cell: 406 596 0733
Google number: 724 427 5350

Anne Rittgers

From: Mike Zweng <alaskaadventure@live.com>
Sent: Friday, March 10, 2023 8:23 AM
To: House Resources; Senate Resources; Sen. Click Bishop; Sen. Cathy Giessel; Rep. Mike Cronk
Subject: Opposition to NPS rule limiting no subsistence hunting methods

I am writing this letter opposing the NPS Preserve Rule limiting non-subsistence hunting methods and urging the National Park Service to withdraw the rule. I am a registered big game guide in Alaska and hire many local individuals. This rule would greatly impact many stakeholders negatively.

There are many impacts to predator hunt closures. Although brown bears are predators, the term predator hunt implies that these hunts are only being performed to reduce predation impact to other animals. This is not the case. Brown bears are a big game animal in their own rite and hunting of them is guaranteed in ANILCA. Many user groups take advantage of this renewable resource and have been for many decades. I rely on brown bear hunts for my livelihood. This will have a very negative effect on subsistence users that rely on moose and caribou as well as other meat animals.

The state of Alaska has a very well established method for game management that has been a great success. This management process relies on local input including Advisory Comities as well as a Board of Game that is made up of experts in game management. Members of the public are also able to give input on proposed game laws. This is a grass roots model and I believe it is much more effective than a top down authoritative style.

Please consider these points and withdraw this new rule and allow the state to manage these the wildlife resources as they have been doing successfully since statehood.

Mike Zweng

Anne Rittgers

From: Jay H. Stanford <jay.stanford18@gmail.com>
Sent: Friday, March 10, 2023 10:50 AM
To: Senate Resources
Subject: Approval for Senate Joint Resolution No. 8

Dear Senate 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
(907)764-4118

Anne Rittgers

From: Jeff Pralle <jkpralle@gmail.com>
Sent: Saturday, March 11, 2023 7:23 AM
To: J Pralle
Subject: National Park Service Rule on predator hunting
Attachments: SJR008A.PDF; Untitled attachment 00010.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

To: All representative and senators of the Alaska Legislature – March 16th, 2023.

My name is Wayne Kubat and I have lived in Alaska full-time since 1976 and have been hunting and fishing here since I first became a resident the following year. I have lived near Wasilla since 1984. I started assistant guiding in 1981, and also bought my own Piper Cub and started flying that same year. I earned my registered guide license in 1986, started my own big game guide service in 1987 – Alaska Remote Guide Service, and obtained my Master Guide license in 2004. I mainly guide for moose, brown bear and dall sheep. I've guided in Denali Preserve since 1986 and have had a sole use guide concession there since 1988. My current term ends in 2027. I served on the Mat-Su advisory committee from 1998-2007 and was the chair for several of those years. I have served on the board of directors for Alaska Professional Hunters Association (APHA) since 2012 and as Vice President for the past 7 years or so.

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Due to intensive management and predator control efforts on State lands for brown and black bear and wolves in the early 2000's, moose populations had mostly recovered prior to 2019-20, but then a couple hard winters occurred shortly after that. There was a better and faster recovery on state land where the efforts took place, but the federal preserve to the north also benefited, because many brown bears and wolves travel back and forth between the preserve and state land. I strongly feel that there would have been little or no recovery on preserve lands had it not been for management efforts initiated by the state on neighboring state land. People who live in the area now have a reasonable chance to harvest moose again.

With that said, I think the situation is again deteriorating rapidly, even though there are year-round brown and black bear seasons and liberal harvest quotas. The Intensive management effort on wolves in GMU 16B was suspended, and wolves have come back strong, and along with healthy populations of bear and the recent bad winters, moose populations are currently experiencing very poor calf recruitment and are rapidly declining.

With the NPS opposition to managing predators, I expect the new rule will result in severe federal restrictions and even closures to current bear and wolf seasons in the preserve, and the moose population will remain in free fall. Aggressive management on state land to the south, may help some in the preserve, but not a lot. Food security will again decrease for Alaska residents due to scarcity of moose.

I would much rather have the state of Alaska manage our wildlife than bureaucrats in Washington and extremely well-funded and anti-Alaska animal rights and anti-hunting NGOs. I again urge you to support Senate Joint Resolution Number 8 and House Joint Resolution number 10, which oppose the New 2023 Rule proposed by the National Park Service.

Wayne Kubat dba Alaska Remote Guide Service

PO Box 874867

Wasilla, Alaska 9968

907-376-9568

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 I 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