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Governor Bill Walker
STATE OF ALASKA

April 6, 2016

The Honorable Sally Jewell
Secretary
United States Department of the Interior
1849 C Street NW
Washington, DC 20240

Re: Proposed Rulemaking on Non-Subsistence Take of Wildlife, and Public Participation and Closure Procedures, on National Wildlife Refuges in Alaska; Docket No. FWS-R7-NWRS-2014-0005

Dear Secretary Jewell:

Thank you for your February 26, 2016, response to my request for an extension on the comment deadline for the proposed rule "Non-Subsistence Take of Wildlife, and Public Participation and Closure Procedures, on National Wildlife Refuges in Alaska" (proposed rule). The extension has allowed critical opportunities for many, including publicly chartered citizen-based groups, to consider and comment.

The State of Alaska strongly opposes implementation of the proposed rule. Despite claims that the proposed rule will not impact subsistence resources and federally qualified rural subsistence users, it would significantly diminish the State's authority to sustainably manage fish and wildlife on all lands in Alaska and would result in severe consequences for rural Alaskans and others who use these public lands and resources.

The majority of Alaska's villages and smaller communities are located adjacent to or surrounded by national wildlife refuges and other expansive conservation areas designated by the Alaska National Interest Lands Conservation Act (ANILCA). Fish and wildlife are primary food sources for Alaska's rural residents and vital to their cultural and traditional heritage. The proposed rule selectively implements national policy that will result in a "hands off" style of management that ignores the State's authority to actively manage and protect wildlife populations, having far-reaching implications on the availability of resources Alaskans have long depended upon.

Alaska's fish and wildlife management system is integrated and complex. Successful and sustainable management depends on federal land management agencies working closely with State fish and wildlife managers and affected users. Even seemingly minor changes done outside the existing regulatory framework and administrative processes will result in long-term consequences for fish and wildlife resources and Alaskans who depend upon them. The proposed rule adds unnecessary

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complexity, leaving users to navigate an even more cumbersome and confusing system. The proposed rule also dramatically changes the public participation and closure process that has long provided Alaskans a voice in management issues that directly affect their lives and livelihoods.

The State stands ready to work with you to prevent unintended consequences associated with this rulemaking and the implementation of related national policy contrary to the intent of ANILCA. These and other issues related to the proposed rule and the environmental assessment are discussed in greater detail in the enclosed comments.

I urge you to carefully consider these and other comments submitted by concerned Alaskans.

Sincerely,



Bill Walker
Governor

Enclosure

cc: The Honorable Lisa Murkowski, United States Senate
The Honorable Dan Sullivan, United States Senate
The Honorable Don Young, United States House of Representatives
Dan Ashe, Director, United States Fish and Wildlife Service
Karen Clark, Acting Regional Director, Alaska, United States Fish and Wildlife Service
Dave Chanda, President, Association of Fish and Wildlife Agencies
The Honorable Sam Cotten, Commissioner, Alaska Department of Fish and Game
Bruce Dale, Director, Division of Wildlife Conservation
Marty Rutherford, Acting Commissioner, Alaska Department of Natural Resources
Ed Fogels, Deputy Commissioner, Alaska Department of Natural Resources