

The Alaska Board of Game would like to thank \_\_\_\_\_ for considering repeal of the US Fish & Wildlife Service's recent rulemaking to prohibit select wildlife management techniques and harvest opportunities.

At the heart of this issue is the gradual dismantling by federal agencies of state authorities to manage and allocate wildlife resources. This is a matter of grave concern to all Americans. Immediate steps by Congress are required to reverse this disturbing course, initially set in motion by the National Park Service (NPS) and now, in essence, repeated by the US Fish & Wildlife Service (FWS).

We are deeply troubled that the NPS rule cannot be reversed through the Congressional Review Act Process due to the imposed deadlines; however, the FWS rule is available for review and repeal until \_\_\_\_\_.

The United States Supreme Court has recognized through a variety of rulings over the last two centuries that the individual states maintain primacy in wildlife management responsibilities and authority.

Alaska's Board of Game and Department of Fish and Game continually work to meet our legal responsibilities for wildlife conservation, population abundance, and opportunities for a wide variety of uses that reflect Alaska traditions and provide food security while managing within our constitutional mandate of sustained yield.

We are tasked with primary wildlife management authorities for the entirety of Alaska, as outlined in Alaska Statute and recognized in the Alaska Constitution, the Alaska Statehood Act, and both the expressed intent and specific laws established by the US Congress. Yet recent rulemaking by the FWS undermines, indeed strips our state of those rights and responsibilities, justified by creative new interpretations of "natural diversity" and "biological integrity" that imply certain consumptive uses of wildlife are incompatible with FWS management purposes.

While the detrimental impacts of this action by the FWS is of immediate concern to Alaska, it bears repeating that the precedent set by this action is a significant threat to all states. The FWS rules represent a clear example of federal overreach through the destruction of state wildlife management primacy.

We urge you to repeal the recent FWS rule while time still allows under the CRA, and thank you for your consideration of this issue of importance to all states and all Americans.

