

National Park Service

ID: LFG-2018-0023

Attn: Regional Director

Alaska Regional Office

240 West 5th Avenue

Anchorage, AK 99501

June 19th, 2018

Re: Docket Number, 1024-AE38

Dear National Park Service,

The National Park Service proposes to amend its regulations for sport hunting and trapping in national preserves in the State of Alaska. This proposed rule would remove a regulatory provision issued by the National Park Service in 2015 that prohibited certain sport hunting practices that are otherwise permitted by the State of Alaska. These proposed changes are consistent with Secretary of the Interior Orders 3347 and 3356.

The National Park Service proposes to remove paragraphs (f) and (g) of 36 CFR 13.42. Paragraph (f) states that State of Alaska management actions or laws or regulations that authorize taking of wildlife are not adopted in park areas if they are related to predator reduction efforts, which is defined as efforts with the intent or potential to alter or manipulate natural predator-prey dynamics and associated natural ecological processes, in order to increase harvest of ungulates by humans. Paragraph (g) sets forth a table of prohibited methods of taking wildlife for sport purposes in national preserves in Alaska. Most of these prohibited methods are also prohibited by the State of Alaska. Some of them, however, conflict with authorizations by the State of Alaska as explained above. The NPS believes that removing paragraphs (f) and (g) would implement the directive announced in Secretarial Orders 3347 and 3356 by increasing hunting opportunities in national preserves and promoting consistency between federal regulations and state wildlife harvest regulations. In addition, the proposed rule would remove the definitions of "Big game", "Cub bear", "Fur animal", and "Furbearer" from section 13.1 because those terms are only used in paragraphs (f) and (g).

As with regard to this proposed rule, I would like to state that I am in opposition to a repeal of the 2015 Obama-era rule that prohibited overly aggressive predator control practices on National Preserves in the State of Alaska. It should be noted that the 2015 National Park Service rule prohibited individuals from engaging in barbaric and other forms of unethical hunting practices. This included but was not limited to a ban on hunting practices in which hurt or killed mother animals and their children at their den sites; baiting brown and black bears with pastries or other human foods; hurting or killing wolves and coyotes with their children during their denning season; targeting caribou, through shooting, from boats or shore as they crossed lakes or rivers; and using animals such as dogs, to hunt other animals, such as bears. This proposed rule from the National Park Service, aims to overturn an existing 2015 National Park Service rule that is already consistent with federal law and to me, was established as a common-sense measure. Further, the already established 2015 National Park Service Rule already prohibits aggressive predator control practices on these preserves in the State of Alaska and I believe that they need to stay in place. So, in conclusion, I am in opposition to this proposed rule that aims to

repeal a 2015 Obama-era National Park Service Rule that would allow individuals to engage in predatory hunting practices, and other forms of unethical hunting practices.


Respectfully,

Isaiah X. Smith¹

¹ www.isaiahsmith.com