

Oral Testimony of
Doug Vincent-Lang
to the
Senate Energy and Public Works Committee

February 9, 2016

Senator Sullivan and members of the Committee, thank you for inviting me to discuss federal overreach into wildlife management in Alaska, including the regulatory changes proposed by the U.S. Fish and Wildlife Service and those recently adopted by the National Park Service pertaining to wildlife management on Alaska's national wildlife refuges and national preserves.

My name is Doug Vincent-Lang. Today I will speak as a representative of Safari Club International (SCI) and from my perspective as a former chief state wildlife manager. SCI is the world leader in preserving the freedom to hunt and promoting wildlife conservation, and our chapters in Alaska are the most effective hunter conservationist groups in my state.

When you consider the uniqueness of Alaska's relationship with its wildlife resources, it is not surprising that the framers of the Alaska Constitution required active management of my state's fish and game for their sustained yields and their many benefits. It is also not surprising that the historic intent and incredible wisdom of the framers of the U.S. Constitution that reserved certain powers to the individual states become crystal clear. This includes the recognition that it is the responsibility of the states to manage and control their natural resources for their unique needs. And, for Alaska,

Congress specifically recognized and guaranteed Alaska's right to manage and control its resources under our state constitution as part of our statehood compact.

Over the past decade, Alaska has begun to experience increased administrative intrusions by federal agencies into management of our fish and wildlife that seem unresolvable given increasingly divergent management philosophies.

The intrusions are wide ranging. They include misuse of the Endangered Species Act. As an example, let's look at the ringed seal. These seals were listed as a threatened species based on speculative modeling forecasting possible reductions over a 100-year timeframe. Yet, these seals currently numbers in the millions and are expected to remain at these numbers through mid-century. Such listings are unnecessary and allow federal agencies to exert management control over listed species and their landscapes.

The National Park Service recently finalized new regulations governing wildlife in Alaska's national preserves over Alaska's objection. In these regulations, the Park Service closed preserves to many hunting opportunities despite there being no conservation concerns. The Park Service chose to substitute their agency ethics and values as to what constitutes appropriate hunting methods, ignoring publically adopted state regulations that allowed those practices.

Now we see the U.S. Fish and Wildlife Service propose new rules that administratively exert federal management control over wildlife in Alaska's national wildlife refuges. These rules will fundamentally alter the federal government's long-standing wildlife management relationship with Alaska. And, once applied in Alaska, we could see similar rules from the Service for similar management across all the states.

The Service is using their administratively adopted Biological Integrity Policy to thwart the protections of state management authority that Congress included in the National Wildlife Refuge System Improvement Act and the Alaska National Interest Lands Conservation Act, both of which confirmed deference to state management.

By incorporating natural diversity principles into their permanent regulations, the Service is replacing time-proven, traditional "active" state management with a "hands-off" management approach. Let me give you a real example. On Unimak Island in Alaska, the Service has elevated natural diversity and its hands-off management philosophy over sound principles of wildlife management. On this island, without active management of both predator and prey populations, an indigenous caribou population has a high likelihood of disappearing. The Service determined that under their natural diversity guidelines it would be acceptable for these caribou to, in the Service's words, "blink out". This, despite one of the Refuge's established purposes being the conservation of these very caribou and their

subsistence uses. The application of this “hands off” approach throughout Alaska’s refuges could put many other populations of moose, caribou, deer and elk at risk, and as a result, seriously reduce opportunities for hunters, including subsistence hunters.

Under a hands-off approach it is questionable whether Alaska will be allowed to continue to actively manage its sheep and bear populations for trophy hunting opportunities. Will Alaska be allowed to continue to actively manage its salmon runs for optimal sustained yield? Will subsistence hunters be required to adopt fair chase standards?

Taken together these agency actions and others represent an unprecedented administrative intrusion by federal agencies into the state’s traditional role as the principle manager of fish and wildlife. It is occurring despite Congressional assurances through a variety of legislative “savings clauses”, which statutorily preserve the state authority to manage. In Alaska this is preventing my state from fulfilling the sustained yield mandates of our constitution and is impacting my state’s ability to manage and provide sustained hunting and fishing opportunities. Those who will suffer the most are those who hunt and fish in Alaska, including subsistence hunters.

We ask Congress to work with us to help preserve the rights and opportunities of Alaska’s hunters and fishers and prevent these federal intrusions. The state fish and game management model is a proven success

that should be built on, not replaced with a new, centralized, one-fit-all, federal conservation model.

We need Congressional action to stop these administrative intrusions. Safari Club International applauds Senator's Sullivan's effort towards this end.

Specifically, we ask Congress to adopt legislation that ensures that the successful state fish and game management model is not preempted or compromised by federal administrative actions. This legislative language should clarify that the federal agencies' responsibility for conservation of wildlife is a monitoring role. The language should also ensure that, unless specifically authorized in statute adopted by Congress, federal agencies be prohibited from adopting regulations that involve seasons, bag limits, methods and means, and from determining the range of sustainable wildlife numbers. Also, federal agency actions involving wildlife management must be preceded by consultation with state fish and wildlife agencies that results in state concurrence. Without concurrence, federal agencies should not be authorized to regulate harvests, except as specifically stated in federal statute.

Safari Club International asks Congress for assistance towards this end and in protecting Alaska's hunters. Thank you for the opportunity to speak with you today.