

Alaskans for Wildlife * Alaska Wilderness League * Alaska Wildlife Alliance
Alliance for the Wild Rockies * American Forests * Animal Legal Defense Fund
Animal Welfare Institute * Audubon Alaska * Back Country Horsemen of New Mexico
Born Free USA * Braided River * Center for Biological Diversity * Clean Water Action
Conservation Congress * Conservatives for Responsible Stewardship
Copper Country Alliance * Daily Kos * Defenders of Wildlife * Earthjustice
Endangered Species Coalition * Environment America
Environmental Protection Information Center * Eyak Preservation Council
Friends of Alaska National Wildlife Refuges * Friends of the Bitterroot
Friends of the Clearwater * Friends of the Earth * Friends of the Wild Swan * GreenLatinos
Gwich'in Steering Committee * Howling for Wolves * Idaho Sporting Congress
Institute for Science and Human Values * International Fund for Animal Welfare
Kachemak Bay Conservation Society * Klamath Forest Alliance
League of Conservation Voters * League of Humane Voters – Wisconsin Chapter
Living With Wolves * Midwest Environmental Advocates
National Parks Conservation Association * National Wildlife Refuge Association
Native Plant Conservation Campaign * Natural Resources Defense Council
New Mexico Sportsmen * New Rules for Global Finance
Northern Alaska Environmental Center * Pacific Environment * Patagonia, Inc.
Progressive Congress Action Fund * Public Citizen
Resisting Environmental Destruction on Indigenous Lands * Save Our Sky Blue Waters
Sierra Club * Southern Utah Wilderness Alliance * Southwest Environmental Center
Speak Up For Wildlife Foundation * Swan View Coalition
The Humane Society Legislative Fund * The Humane Society of the United States
The National Wolfwatcher Coalition * The Wilderness Society
Upper Gila Watershed Alliance * Vet Voice Foundation * Western Watersheds Project
WildEarth Guardians * Wilderness Watch * Wildlands Defense * Wildlands Network
WildWest Institute * Wolf Conservation Center

March 8, 2017

RE: Oppose H. J. Res. 69

Dear Senator,

On behalf of our millions of members and supporters nationwide, we urge you to oppose H. J. Res. 69, the Congressional Review Act (CRA) resolution to rescind the U.S. Fish and Wildlife Service's (FWS) Alaska National Wildlife Refuges Rule. Voiding this vital rule would jeopardize iconic species in Alaska, subvert fundamental environmental laws and undermine management of federal public lands. H. J. Res. 69 is a blatant attempt to cede control of America's wildlife on over 76 million acres of national wildlife refuges in Alaska to appease narrow state interests, and could have drastic implications for federal management of public trust resources across the country.

The Alaska National Wildlife Refuges Rule helps protect bears, wolves and other native carnivores on federal public lands to conserve wildlife and natural ecosystems that benefit all Americans. The rule prevents application of Alaska's aggressive "predator control" policy on national wildlife refuges in the state. Alaska's scientifically indefensible predator control program aims to artificially increase game

populations by driving down carnivore numbers through extreme practices, including killing mother bears and cubs, killing wolves and pups in their dens, and trapping, baiting and using airplanes to scout and shoot bears. The majority of Americans, including Alaskans, oppose these highly controversial, extreme measures that could reduce or eliminate these species across entire landscapes.

The Alaska National Wildlife Refuges Rule ensures America's refuges are managed as Congress intended, consistent with bedrock federal laws governing the National Wildlife Refuge System. Under the National Wildlife Refuge System Improvement Act, FWS is required to maintain ecological integrity across refuge ecosystems and the Alaska National Interest Lands Conservation Act (ANILCA) mandates conservation of species and habitats in their natural diversity on refuges in the state. ANILCA also prioritizes conservation of wolves, bears and other carnivores as a statutory purpose of FWS management for many Alaska national wildlife refuges. The agency's reasonable regulation simply implements these federal laws, preserving America's wildlife heritage on these public lands while still allowing for traditional subsistence and sport hunting.

Voiding this vital rule would undermine federal authority to manage wildlife on more than 76 million acres of public lands congressionally reserved for wildlife conservation. It would impair science-based stewardship of natural resources, limit FWS's ability to sustainably manage wolves, bears, and other native carnivores, and upset the natural ecological balance on these wild lands that belong to all Americans.

Using the CRA to rescind the Alaska National Wildlife Refuges Rule also undermines the federal regulatory process, wastes taxpayer dollars and rejects public input in agency decision making. The CRA is a blunt instrument that sidelines important debate, often circumvents committee consideration, and prevents filibuster protections in the Senate, all with the aim of hastily invalidating federal rules that have often been years in the making. Upon enactment of a CRA resolution, the underlying rule becomes void and the promulgating agency is prevented from future issuance of a rule that is "substantially the same" without an act of Congress.

The National Wildlife Refuge System is the only network of federal lands and waters established specifically to promote wildlife conservation. The System includes 566 national wildlife refuges, with at least one in every state and U.S. territory, preserving hundreds of millions of acres of habitat essential to the survival of an astounding diversity of wildlife, and providing millions of Americans access to wildlife-dependent outdoor recreation. Congress has designated 16 national wildlife refuges in Alaska, including some of the Refuge System's most incredible "crown jewels," like the Arctic National Wildlife Refuge.

Americans expect wildlife conservation on these federal lands will follow proven conservation principles and sound science, and support traditional ethical standards for species management. The Alaska National Wildlife Refuges Rule is necessary to ensure these expectations are met. We urge you to stand up for wildlife and the National Wildlife Refuge System and uphold this rule by voting NO on H. J. Res. 69.

Sincerely,

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