

**On-Time Public Comment Index
for Proposals 209, 210, 211**

Afognak Native Corporation PC372

David Hilty PC373

Alexus Kwachka..... PC374

Native Village of Port Lions PC375

Written comments on Proposals 209, 210 and 211 were accepted through March 15 because they were recently added to the board meeting agenda.



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March 14, 2023

Alaska Board of Game
P.O. Box 115526
Juneau, AK 99811-5526
(907) 465-4110
www.boardofgame.adfg.alaska.gov

**RE: Board of Game Southcentral Region Meeting
March 17 - 21, 2023
Kenai / Soldotna
Board of Game proposal 209**

Dear Chairman Burnett and Board Members,

We, the Afognak Alutiiq people, have inhabited our traditional lands of the Kodiak Island Archipelago for over 7,500 years. Afognak Native Corporation ("Afognak" or "the Corporation") represents over 1,200 Native Shareholders, who are descended specifically from the Village of Afognak, on Afognak Island, in the northern part of the Archipelago. Afognak was organized in 1977 through the merger of two ANCSA village corporations: Port Lions Native Corporation and Natives of Afognak, Inc. Afognak owns 248,000 acres of land in the Kodiak Archipelago, primarily on Afognak Island. Our lands represent our most valuable asset. They have formed the core of our financial success as a Corporation, and they demonstrate continued value through Shareholder use for culture, subsistence, economic development, and recreational activities.

Afognak Native Corporation is writing in support of Alaska Board of Game generated Proposal 209, regarding the distribution of Elk hunting permits in Game Management Unit 8. Roosevelt Elk were transplanted to Game Management Unit 8 in 1929, and Ouzinkie and Port Lions have taken part in the yearly harvests in all years since hunting started in 1950 until the last couple of years. The Ouzinkie Native Corporation Hunting Committee ("the Committee")



on behalf of the residents of Ouzinkie and Port Lions worked for several years to develop and submit a proposal with language similar to the current Proposal 209. That original proposal contained incorrect wording that disqualified it for consideration. The Board of Game and the Department of Law worked with the Committee to develop Proposal 209 that remains true to the intent of the original in attempting to improve access to Elk hunting for our communities.

The Roosevelt Elk is listed in the Super Slam of North American Big Game of the Grand Slam Club by Ovis and the State of Alaska, Governor's Super Seven (7) Big Game Raffle and thus included in the most elite categories for big game hunting. These hunting triumphs are promoted far and wide throughout the sportsman's and hunting communities. They are frequently advertised in sporting magazines and direct notification through association membership and the State of Alaska's Department of Fish & Game, which has resulted in increased pressure from sports hunting community. This has led to increased numbers of individuals from all over Alaska and the lower 48 putting in for a State of Alaska Elk, Drawing Permit and reduced the odds of receiving a permit overall, especially for local residents. In fact, despite many permit applications, only a handful of Port Lions or Ouzinkie residents have received Elk hunting permits during the past several years. The probability of having a resident of Port Lions or Ouzinkie selected for an Elk permit has gone from around 30% to less than 4%.

Residents of Port Lions and Ouzinkie have historically depended on Elk meat to feed their communities as all food must be brought in via boat or plane or produced/harvested locally due to the absence of grocery stores. The Elk and deer harvested nearby makes a significant contribution to the food security of the residents. The contribution to food security is multiplied through the widely acclaimed "Elk for Elders" program in which the meat is distributed throughout the communities with a particular focus to the elders. In other words, Port Lions and Ouzinkie residents hunt Elk for food not trophies. They are primarily subsistence hunters.



Many Port Lions and Ouzinkie residents are shareholders in Afognak Native Corporation and/or Ouzinkie Native Corporation. These corporations own most of the land where Roosevelt Elk are hunted. As landowners, Afognak Native Corporation and Ouzinkie Native Corporation have permitted the public (non-shareholders) access to their land for Elk hunts. We understand that fish and game resources in Alaska are managed for the benefit of all. We strive to provide opportunities for all individuals to pursue both sport and subsistence hunting through a well-developed land use program. This is unusual throughout the United States as most private landowners, nationwide, are either compensated for the hunting use of their land, often by being granted hunting permits, or exclude public hunting altogether. This is also atypical in Alaska as most regional ANCSA corporations and village corporations do not allow non-shareholder hunting.

Proposal 209 addresses the increased difficulty for residents of Ouzinkie and Port Lions to obtain an elk hunting permit through the current lottery draw system. It proposes to distribute 16 elk hunting permits in Port Lions and Ouzinkie on a first-come, first-serve basis such that eight permits are distributed in each community. There will be public notice regarding when the permits are available for pickup. While it is expected that some of the elk hunting permits will go to local residents, the proposal allows non-residents to travel to either Ouzinkie or Port Lions to pick up a permit, again on a first come, first-serve basis. The 16 permits proposed to be awarded under Proposal 209 represent 2.7% of total Unit 8 Elk hunting permits issued by lottery (592) and 9.4% of the permits (170) of the Remainder and Eastern Afognak Elk regulatory districts within Unit 8.

To reiterate, Afognak Native Corporation is in support of Proposal 209. It does so because the proposal supports the subsistence Elk hunting needs of Port Lions and Ouzinkie without establishing a separate subsistence hunt and because the proposal, if approved, will help to ensure continued public Elk hunting access on Afognak Native Corporation and Ouzinkie



Native Corporation lands. It achieves this while requesting that a very small portion of the Unit 8 Elk Permit Lottery pool be distributed in Port Lions and Ouzinkie.

If you have any additional questions regard the details of Proposal 209 or the strong support for the proposal from Afognak Native Corporation and Ouzinkie Native Corporation, please do not hesitate to contact me at (907) 481-2117 or email at nhayden@afognak.com.

Sincerely,

DocuSigned by:

Greg D Hambright

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Greg Hambright
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Anchorage, AK 99503

Natasha M. Hayden

Natasha M. Hayden, P.E.
Afognak Native Corporation
V.P of Lands & Natural Resources
300 Alimaq Dr.
Kodiak, AK 99615



Submitted by: David Hilty

Community of Residence: Kodiak Alaska

Comment:

I strongly oppose proposal 209. I am a commercial pilot that has flown over Afognak and Kodiak for nearly the last 40 years. I occasionally contract with the state to do aerial elk surveys as well as report my own elk sightings to the local ADF&G. I am familiar with logging activities and seasonal elk migration patterns on Afognak as I frequently fly over these areas in the Spring summer and Fall.

The proposal states that residents of Port Lions and Ouzinkie do not have hunt opportunities on Afognak, I DISSAGREE. I have hunted elk on Afognak for the last 40 years and I can say that I have had some level of success every one of those years. Yes, 15 years ago it was easier to draw a tag or be assured a registration opportunity but now, one must be more resourceful. First it is important to apply the maximum amount of times allowable for your hunt area and encourage family members that are able to apply and hunt with you, this increases your odds dramatically. Like many others, I am anxious to look up the draw hunt results, If I do not win a draw, I then look at the list of winners to see if any of my friends won. Elk, like moose is a two or three person hunt, so I try to pair up with someone. Many years, we will go on two or three hunts before succedeing but we always do

For most Afognak land shareholder elk hunting is different. If you win a draw tag, your next phone call is the land managers to reserve a truck, driver and lodging. It is a great opportunity for them to cover and access a lot of land. The success rate is very high with this approach I would guess nearly 100% for those are serious hunters. If granted any village permits, their success rate would disproportionately disrupt opportunities for other hunters. Not only would there be less tags in the general pool, there would be less registration chances due to high success rate in two of the three areas with roads.

In the initial proposal 199 which the board references in this proposal, I was disappointed to see that the author went as far as requesting an exclusive season 2 weeks before others can hunt. in my view this showed the intent that the shareholders wanted to be able to drive up to the undisturbed elk herds in the portage meadows and shoot them off or near roads before they scatter from outside hunting pressure.

The author also states in 199 that nearly half of afognak is privately owned by Ouzinkie and Afognak, inferring that is a reason they should have preference. A quick internet search showed in my estimation that over 250,000 acres of their lands have been sold to the sum of my estimation well over \$300,000,000. All of which is in conservation easements with public access. Ref. Exxon Valdez oil spill parcel index and other internet sources.

I have a lot of friends who are afognak shareholders. I am happy when they succeed on a hunt. I believe that if given this unnecessary preference, it will set a precedent and affect tens of thousands of hunters in Alaska.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 209: Oppose



Submitted by: Alexis Kwachka

Community of Residence: Kodiak, Alaska

Comment:

Chairman Burnett and Members of the Board of Game,

My name is Alexis Kwachka I have been a resident of Kodiak for 36 years. I oppose proposal 209 for these reasons:

1- This will pull permits from areas that are not on Afognak private property to benefit the private land owners at the cost of the Alaskan public.

2- Land use permits are required to access private land on Afognak
200 dollars for land use permit, and 500 dollars for an elk endorsement.

Does this contribute to less animals being harvested during drawing hunts? 700 dollars can be a burden to an already expensive hunt.

If elk go unharvested during draw permit hunt period, ADF&G opens registration elk hunting. When this happens ALL PRIVATE LANDS ARE CLOSED TO NON LAND OWNERS.

The elk endorsements go away and all elk hunting is shut down to non land owners.

REGISTRATION HUNTS BECOME EXCLUSIVE HUNTS FOR THE LAND OWNERS, ON THEIR LAND. IS THIS NOT CONSIDERABLE OPPORTUNITY ALREADY?

The problem is these animals are a common use resource to all ALASKANS and this proposals will exclude opportunity to some % of us. As a public resource we all contribute to the management of the resource.

3 This proposal is being sold as providing food for the elders. If this is the objective of the proposal, the private land owners should consider requiring each of the people that harvest elk on their property to donate meat to support Ouzinkie and Port Lions elders.

4 The Board of Game should also consider the fact that the private land owner have altered the elk habitat through extensive logging. Has this contributed to the out migration of elk from their property? A large network of roads are all through the private land owners property. These roads are used exclusively for the private land owners to access elk during draw hunts and registration hunts. Does this contribute to elk leaving the areas that are easily accessed by truck and four wheelers?

5 If the Board of Game allows 16/8 permits to be divided between Ouzinkie and Port Lions? Who is going to administer this? and who is going to pay for this? Are these permits exclusive to these community residents? Most likely not. Has the proposer considered how this will likely bring in outsiders standing at the door for a permit?

For 36 years I have chased Deer, Elk, Goats all over the Kodiak Archipelago. I do not hunt on private land to take elk and I too need access to feed my family. I have a fundamental problem with taking a common use resource from one group and giving it to another. This proposal will do just that. I contribute to the general fund every year by applying for draw hunts. This year NO, NO, NO, NO, NO, NO ect, on all the permits that I applied for, that's why it's called a drawing. I will be at the desk asking for a registration tag to hunt elk this year. Please do not take opportunity away from me.

Lastly the area closest to town to hunt elk is an exclusive area during registration elk hunting, that area is closed to me.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 209: Oppose



Traditional Tribal Council
P.O. Box 69, Port Lions, Alaska 99550
PORTLIONSTRIBE.NET



PC375

Alaska Board of Game
P.O. Box 115526
Juneau, AK 99811-5526
(907) 465-4110

www.boardofgame.adfg.alaska.gov

RE: Board of Game Southcentral Region Meeting, March 17 - 21, 2023 Kenai / Soldotna, Board of Game proposal 209

Dear Chairman Burnett and Board Members,

The Native Village of Port Lions tribal people have inhabited and hunted in the Kodiak Island Archipelago for over 7,500 years. The Native Village of Port Lions original inhabitants were from the Old Afognak village that was destroyed in the 1964 tsunami. The Native Village of Port Lions is writing in support of Alaska Board of Game generated Proposal 209, regarding the distribution of Elk hunting permits in Game Management Unit 8. Roosevelt Elk were transplanted to Game Management Unit 8 in 1929. Port Lions residents have taken part in the yearly harvests in all years since hunting started in 1950 until the last couple of years.

Residents of Port Lions have historically depended on Elk meat to feed their communities as all food must be brought in via boat, plane, or produced/harvested locally due to the absence of grocery stores. The Elk and deer harvested nearby makes a significant contribution to the food security of the residents. They are primarily subsistence hunters.

Proposal 209 addresses the increased difficulty for residents of Port Lions to obtain an elk hunting permit through the current lottery draw system. It proposes to distribute 16 elk hunting permits in Port Lions and Ouzinkie on a first-come, first-serve basis such that eight permits are distributed in each community. There will be public notice regarding when the permits are available for pickup. While it is expected that some of the elk hunting permits will go to local residents, the proposal allows non-residents to travel to either Ouzinkie or Port Lions to pick up a permit, again on a first come, first-serve basis. The 16 permits proposed to be awarded under Proposal 209 represent 2.7% of total Unit 8 Elk hunting permits issued by lottery (592) and 9.4% of the permits (170) of the Remainder and Eastern Afognak Elk regulatory districts within Unit 8.

The Native Village of Port Lions is looking forward to another partnership with the State of Alaska in support of distribution of the permits similar to the way we distribute the Goat tags and subsistence salmon permits at no cost to the State of Alaska.

If you have any additional questions regarding our support, please do not hesitate to contact me.

Sincerely,

Nancy Nelson
President