



January 21, 2022

Alaska Board of Game

Via email to dfg.bog.comments@alaska.gov

Re: Opposition to Proposals 210, 211, and 244

To members of the Alaska Board of Game:

The Alaska Federation of Native (AFN) writes to submit the following comments on **Proposals 210, 211, and 244** as presented in the Board of Game's 2020-2021 Proposal Book and 2021-2022 Supplemental Proposal Book.

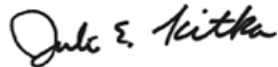
AFN is the largest statewide Native organization in Alaska. Our membership includes 158 federally recognized tribes, 141 ANCSA village corporations, 10 regional ANCSA corporations, and 12 regional nonprofit and tribal consortiums that contract and compact to run federal and state programs.

AFN strongly opposes these proposals seeking to eliminate the Community Subsistence Hunts ("CSH"). The CSHs provide an important opportunity for Alaska Natives and all Alaskans to meet their subsistence needs. The community-based pattern of subsistence hunting is a long-standing customary and traditional practice of Alaska Natives, and the Alaska Board of Game has recognized the need for these hunts to meet subsistence needs in many areas of rural Alaska, including Chalkyitsik, Yukon Flats, and a vast swath of the Copper River Region, including the eight Ahtna villages: Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti Kaah. Community Subsistence Hunts have been successfully conducted for more than 20 years.

The State of Alaska's subsistence priority statute (AS 16.05.258) obligates the Alaska Board of Game to provide for reasonable opportunities for customary and traditional uses of fish and game. While the CSHs do not entirely fulfill this obligation, the elimination of the CSHs would devastate the opportunity for many Alaskans to meet their subsistence needs. The state's statutory obligations may not be met simply by relying on fundamentally different federal subsistence hunting opportunities that are limited to federally qualified rural residents, especially given that federal opportunities are very limited in the communities that rely on the CSHs.

Simply put, the customary and traditional needs of the Alaska Natives are not being met. To whittle away opportunities for subsistence users, like eliminating Community Subsistence Hunts, only takes us further from the obligations Congress imposed under Title VIII of the Alaska National Interest Lands Conservation Act and those required under Alaska Statute. Please **reject Proposals 210, 211, and 244.**

Sincerely,



Julie Kitka
President