

On-Time Comment Index

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AC01

Fairbanks Fish & Game Advisory Committee

Interior Region Fish & Game Advisory Committees

Jeff Lucas
Chairman
1030 Daisy Drive
Fairbanks, Alaska 99712

Central
Delta Junction
Eagle
Fairbanks
GASH
Koyukuk River
Lake Minchumina
McGrath

Middle Nenana River
Middle Yukon River
Minto-Nenana
Ruby
Stony Holitna
Tanana-Rampart-Manley
Upper Tanana Fortymile
Yukon Flats

November 14, 2024

To: Alaska Board of

Game Re: Agenda

Change Requests

Dear Chair Hoffman and members of the Board of Game,

The Fairbanks Fish & Game Advisory Committee (FAC) met last night, November 13th, and discussed the Agenda Change Requests (ACRs) before the board at your November 21, 2024, meeting.

Below are our comments.

ACR 3 – **SUPPORT**

We voted unanimously that ACR 3 meets the criteria for acceptance, as it was not intended for Delta Bison permit winners whose permits were revoked due to a conservation concern to have to wait ten years before they could apply again.

ACR 6 – **SUPPORT**

We voted unanimously that ACR 6 meets the criteria for acceptance. This is a housekeeping issue that should be addressed.

ACR 5 & ACR 9 – **OPPOSE**

We voted unanimously in opposition to ACR 5 from the 19C Sheep Working Group, and ACR 9 from Resident Hunters of Alaska. Neither ACR meets the criteria for acceptance. Both of these ACRs are management and allocation plans for Unit 19C,

which should never come in via an ACR. These issues should always be addressed in cycle.

Sincerely,
Jeff Lucas - Chairman

Recorded By: Mark Richards
Approved By: Jeff Lucas
Date: 11/14/2024



Name: Lower Kuskokwim Fish & Game Advisory Committee

COMMENTS TAKEN FROM DRAFT MINUTES OF THE LOWER KUSKOKWIM AC ON ACR 4

The Lower Kuskokwim Advisory Committee met on November 7th and 8th, 2024 and discussed Central & Southwest and Statewide proposals that have been submitted to the Board of Game. ACR 4 was added to the agenda to be discussed and these are excerpts from the draft minutes to be submitted as comments to the ACR meeting on November 21st.

Day 1 conversation -A quorum was established with 6 members present


Chariton Epchook, introduced ACR 4 asking for the Boundary change for Zone 2 of RM 615 hunt. He says he is concerned with not meeting allocation for past few years and how high gas prices are in the village. Earl would like to support the ACR. The distance creates a financial burden to the hunters. They do not have the income to get that far. Anthony from Kwethluk added sometimes the water is too shallow to reach that far upriver and not everyone can afford a jet motor so there is wear and tear on motors. Earl speaks in favor of the ACR because of the financial burden and this would relieve that burden. Earl was also concerned about changing water levels. David Gilila said that it is hazardous to travel up to Zone 2. People have drowned in the Kisaralik river. The river is rich with personal equipment, guns, boats. David said he has seen crashes. The AC would like to discuss it more in the morning on the 2nd day.

Day 2 conversation -A quorum was established with 7 present

ACR 4 submitted by Chariton Epchook of Kwethluk was discussed. Questions were asked if the boundary for Zone 2 was written in regulation and if this was the only process to change it. Since it is not, they asked if there are other ways to change the boundary instead of the ACR process or waiting 2 years for the proposal cycle or without the Board. Keith Oster, ADFG, explained that the department wanted it to go through the public process and not emergency order. Chariton said that the channel by the mudhouse has eroded sides and makes it more difficult to navigate and just below Magic Creek gravel has spread. That would have been an unforeseen or unexpected thing that happened that reduced reasonable opportunity. There was an bad collision on Akulikutak River because of the long twists and narrow river. It is dangerous to travel to the area. Earl reviewed the ACR policy and thinks it may meet criteria of unforeseen event. He asked if it would help to get letters of support from Eek, Akiachak, etc. Earl believes that it fits item E because of the environmental changes that have happened and it has become dangerous. Stella (Eek) will offer letter of support. Earl- if Kwethluk can reach out to Eek, Akiachak, Tuluksak will help process.

Members present include: Phillip Peter Sr., John Andrew (Day 2), David Gilila, Earl Samuelson, Henry Parks, Nicholai Stevens, Stella Alexie

Comments approved by chair:



Phillip Peter Sr. of Akiachak



PC01

1210 N Kim Drive, Suite B, Meadow Lakes, Alaska 99623
Phone: 907-232-2845 - Email: info@mlccak.org - Website: www.mlccak.org

November 13, 2024

Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

RE: ACR #1 – Close the trapping season for river otter in Units 14A, 14B, and 16

Dear Fish and Game staff:

The Meadow Lakes Community Council membership supports closing of trapping river otters in the Meadow Lakes area. Northern pike are an increasing issue.

The Council membership voted to submit these comments at our November 13, 2024, meeting.

Sincerely,

A handwritten signature in cursive script that reads "Camden Yehle".

Camden Yehle, President
Meadow Lakes Community Council





PC02

Name: Lang Van Dommelen

Community of Residence: Meadow Lakes

Comment:

November 15, 2024

Agenda Change Requests (ACR) 2 & 3 have been submitted to the Board of Game both in regards to the Delta Junction Bison Hunt. These requests would change 5 AAC 92.050(a). Both these requests ask the board to consider allowing hunters awarded Bison tags that were subsequently revoked for conservation purposes to hunt this tag during another year. The ADF&G request (ACR 3) also offers an alternative that would revoke the 10-year/lifetime restriction on entering the draw.

Bison hunting in Alaska is, for most hunters, a once-in-a-lifetime opportunity, and the likelihood of drawing the tag is 0.2% many people put in for this tag for their entire life and never get drawn. The likelihood of it happening a second time is astronomically low.

I would ask the board to take up ACR requests 2 & 3 and add these items to the upcoming regular board meeting in March of 2025.

Thank you for your consideration,

Lang Van Dommelen



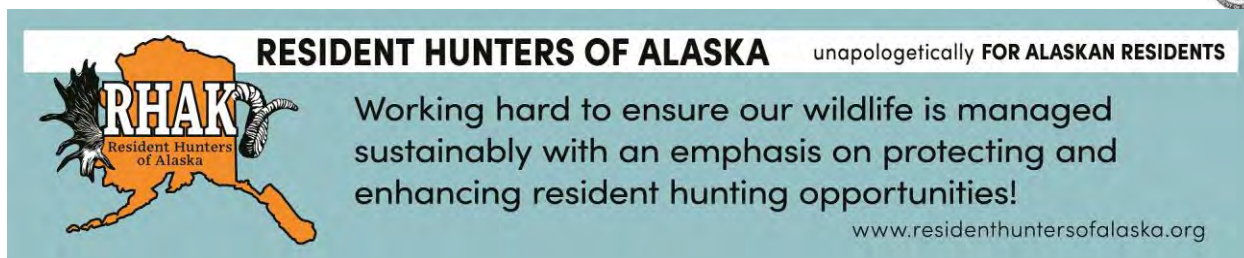
PC03

Name: Casey Campbell

Community of Residence: Wasilla

Comment:

Let's look at ACR#1 again. I notice the F&G response note "it is not aware..." of various things. The loss of returning salmon is known. Perhaps river otter population increases w help the predatory fish.



November 15, 2024

To: Alaska Board of Game

Re: Agenda Change Request Meeting

November 21, 2024

Resident Hunters of Alaska

Comments on Agenda Change Request (ACR) #5 and #9

ACR 5, from the Unit 19C Sheep Working Group (SWG), and ACR 9, from Resident Hunters of Alaska (RHAK), are essentially sheep management and allocation plans for Unit 19C. ***Neither ACR meets the criteria for acceptance. Both are strictly about allocation among user groups.***

RHAK submitted ACR 9 after seeing how the SWG process played out, as a rebuttal to the way the board has, frankly, abused its authority over the public process in how proposals come before the board and what happens to proposals after they are before the board. All this information is in the preface of RHAK ACR 9.

Board members are already on record supporting acceptance of the SWG ACR 5, even though it clearly does not meet the criteria for acceptance. Two board members participated in the SWG process, breakout sessions, expressing opinions as to what they'd like to see with Unit 19C sheep management, until it came time to vote on the SWG recommendations. That was declared a conflict of interest, but not the participation in the process prior to the vote.

This is not how the system is supposed to work. And all of this is the board's own making, starting with the board generating their own 19C sheep proposal at the 2022 ACR meeting, then closing all 19C sheep hunting to nonresidents for five years at the 2023 Soldotna meeting, then creating a Unit 19C Sheep Working Group and deferring all the 2024 19C sheep proposals submitted on time, in cycle, to the 2025 Statewide meeting, for the express purpose of inserting recommendations from the 19C SWG along with the deferred proposals.

The only way the 19C SWG recommendations can be before the board out of cycle along with the deferred 19C sheep proposals is via an ACR that is entirely allocative in nature. Again, not how the process is supposed to work.

The bottom line is that neither ACR 5 nor ACR 9 meets the criteria for acceptance to be heard out of cycle. But if the board believes that ACR 5 meets the criteria for acceptance, then they can't claim that ACR 9 doesn't also meet the criteria.

The board needs to follow the proper public process throughout. The 3-year cycle is already too long between when changes can be made, and the public twice now will see Unit 19C sheep allocation decisions determined out of cycle by board-generated actions that disenfranchise the public.



Name: Dewey Bitler

Community of Residence: Meadow Lakes

Comment:

Susitna Valley - Northern Pike/Otter Ecosystem

There have been minimal, if not any, salmon returning to the Susitna drainage system. In 2006, 69,800 sockeye salmon returned to Shell Lake, near Skwentna AK. In 2014, only 6 sockeye salmon returned. Red Shirt Lake, Trapper Lake, Alexander Lake, and Shell Lake have been decimated by Northern Pike. Alexander Creek once supported a multimillion-dollar sport fish industry with ten full time lodges, along with numerous guides, air and boat charter services-all of which are no longer in operation since the king salmon fisheries plummeted. The Pike also affects muskrat, waterfowl, invertebrates, frogs and other non-salmonid fishes. The introduction of pike has affected the whole ecosystem. Alaska Department of Fish & Game, along with Cook Inlet Aquaculture association(CIAA) have spent north of \$800,000 netting Northern Pike, trying to eradicate them. In 2019, 1,323 northern pike were harvested by gill net from Shell Lake during the open water season May 23-Sept 24. Approximately 56 Northern Pike were partially eaten by river otter. There is a need for a natural predator of the pike to be relentlessly pursuing them 365 days a year.

There is no predator of fish more suited for this task than the river otter. They regularly eat 2-3 pounds of fish per day, are efficient, and offer a "no cost" solution to a complicated and costly problem. River otters can dive to 60 feet, stay under water for 4 minutes, swim about 6 mph and live up to 20 years. Their pups are born toothless and blind anytime between January(during trapping season) to June. Their eyes open 7 weeks later. In their 20 year lifespan, each river otter has the potential to eat over 10,000lbs of fish.

The trapping season in Unit 14 and 16 goes from Nov 10-March 31 with "no limit". At \$100 a pelt it doesn't make sense to spend 1 million dollars on gill netting pike, when the river otter can do it for us. There needs to be a restriction on river otter harvest in all non-native pike habitats. In trapping region IV from 2016 to 2021 (according to Fish & Game sealing records) 889 river otters were taken.

Pike of all sizes consume salmon, but the smaller pike eat the most. River otters eat smaller pike, the ones that typically eat the juvenile salmon. We have studied the salmon problem for years and have found many problems. The northern pike is one problem that can be handled by the river otter if you give it a chance.

With that said I believe that the trapping season, specifically on river otters, needs to be restricted

Dewey Bitler



Wasilla AK 99623

References:

1. Shell Lake Sockeye Salmon report 2019
Andy Wizik
2. ADFG river otter species profile
3. ADFG 2021 wildlife management report(trapping)
4. Alaska fish and wildlife news September 2016

I support ACR#1

There is no science behind the current regulation with regard to known numbers of river otters. There is no research on using river otter as a predator control method for northern pike. We have lost salmon returns to a lot of lakes due to northern pike. The state of Alaska has spent more than \$1 million eradicating northern pike with gillnets and rotenone. The price is so low for River Otter that they are worth more to Alaska consuming Northern Pike

River Otter have coexisted with salmon for 1000s of years and will eat salmon, but northern pike have been here for a short time and just about wiped out the salmon. The "Biological concern" is the disappearance of Salmon in the Susitna drainage due to Northern Pike as one of the many causes. The River Otter is the all-natural Alaskan apex predator of fish that will help with the suppression of Northern Pike.

This ACR may reduce a handful of Alaskans the opportunity to harvest River Otter but will help a lot of Alaskans with controlling Northern pike and in turn help Salmon returns.

The Association of Fish and Wildlife Agencies has a Best Management Practices for trapping River Otter in the United States. There is a section on how to avoid capturing otter when trapping Beaver
