

Chairman, Board of Game
October 21, 2008

The following comments give a brief description of the position that the Division of Alaska Wildlife Troopers (AWT) have on the proposals that are up for consideration at the November 2008 Alaska Board of Game meeting in Juneau.

Generally when the Board considers seasons and or bag limit changes, the Division of Alaska Wildlife Troopers requests that every effort possible be made to align the season dates and bag limits with adjacent game management units or sub units.

In general when the Board considers the creation of new hunts, additions of a controlled use or management area, or a more complex regulation scheme such as hunting corridors and split seasons, The Alaska Wildlife Troopers strongly request the Board to recognize the fact that the division has limited resources and man power. Any new hunt, regulation scheme or controlled use area restriction may not be adequately enforced.

The Alaska Wildlife Troopers will give detailed explanations as to the reasons that the division opposes or favors a particular proposal.

Please contact me at (907) 451-5160 if there are any questions.

Thank you.

Dave Lorrington,
Alaska Department of Public Safety, Division of Alaska Wildlife Troopers.

Proposal analysis:

PROPOSAL # 5: - 5AAC 92.044. Permit for hunting black bear with the use of bait or scent lures, and 92.052. Discretionary permit hunt conditions and procedures.

AWT is opposed to the new section that is being proposed by the author that states; (11) providing the exact bait locations, including the exact GPS locations or map markings is voluntary. Black bear baiting conditions and hunting bears under bait is a highly regulated activity by the department. The department must keep these conditions in place because baiting by design can bring black and brown bears into a congested area, and bear baiting is very unpopular and highly scrutinized by some segments of the non hunting public and there is a constant effort to eliminate baiting as a method of harvesting bears. By keeping restrictive measures in place, ADFG is telling the public that not only is baiting an essential means of harvesting black bears, but ADFG is fully engaged in the way the bears are harvested. By requiring exact locations of bait stations, Alaska Wildlife Troopers can maintain the oversight that is needed to keep this set of conditions effective.

PROPOSAL #10: 5AAC 85.045(a) (1). Hunting seasons and bag limits for moose. Modify the moose antler restriction in RM038 to allow the harvest of bulls with two brow tines on both sides in addition to the existing spike-fork, 3 or more brow tines on one side, or 50" antler bag limit.

AWT requests that the proposed brow tine restriction language be modified to remove any mention of three brow tines, and to make the new brow tine language read: Two or more brow tines on each side or 50" antler bag limit. AWT also requests that this language pertain to all areas in SE Alaska where "Andersoni" sub species moose exist and an antler restriction is necessary. Antler restriction violations are the most common big game hunting violation that AWT encounters and judging antler size is the most problematic area for hunters when moose hunting. Making antler restrictions regulations simple and making them pertain to as large of an area as possible is very important to both hunters and enforcement personnel.

PROPOSAL #14: 5AAC 92.510(a) (5) (D). Area closed to hunting. Clarify the boundaries of the Blind Slough closed area as follows: Including the waters of Blind Slough between those hunting closure markers.: This clarification of the Blind Slough boundary assists resource users and enforcement personnel alike by making the boundary of the area that is closed to hunting more understandable and easier to locate in the field. AWT **supports** this proposed regulation change.

PROPOSAL #22:- 5AAC 92.550. Areas closed to trapping. Modify the areas closed to trapping in GMU 1C as follows. AWT fully supports a statewide regulation that requires the marking of traps and snares with the trapper's identification number or the posting of signs close to the trapping sites with the same information. AWT supports the alternative language in the "other solutions considered" section of this proposal that would require trappers to post trapper identification signs at trap locations. This regulation if adopted would then conform to regulations in other parts of the state that have signage requirements. Trappers who post signs and /or mark individual traps with confidential non-identifying ID numbers, assist law enforcement efforts in identifying potential

conflicts with other users before they happen. Signage also alerts pet owners that there are legally set traps in the area and to proceed with the due care. This option, if adopted by the board, would go a long way in reducing user group conflicts on these trails.

PROPOSAL #23: 5AAC 85.015. Hunting seasons and bag limits for black bear.

Modify the regulation restricting the taking of a white phase black bear in Unit 1D: Alaska Wildlife troopers request the Board of Game to implement wording that defines a white color phase black bear and will make this regulation enforceable. Other options are for the board to remove this regulation that is protecting an individual animal, or to implement a regulation that defines and protects white color phase black bears state wide.

PROPOSAL #29: Evidence of sex and identity. Extend the damaged, broken, or altered moose antler regulation in effect for 1B and 3 to include the entire RM038 hunt area. Alaska Wildlife Troopers **support** the department in their quest to make the RM 038 regulations comprehensive.

PROPOSAL #33: Unlawful methods of taking furbearers; exceptions. Eliminate Unit 5 from the trap identification requirement as follows: The Alaska Wildlife Troopers **oppose** this proposal. AWT fully supports a statewide requirement to mark trapping gear as set out in current regulation for specific units. Marking gear with a “confidential” trapper identification number assists law enforcement personnel with identifying illegal gear in the field, has proven effects of reducing trapper violations, and has proved to decrease the incidental take of non targeted species by gear that has not been removed from the field during a closed season. These are positive steps for the trapping industry in promoting good user group relationships and should not be decayed by removing trapping gear identification in areas where it currently exists. Commercial trap tag technology and/or competent individual tag manufacture is such that tags that are attached to trapping gear do not come off through normal field use.

PROPOSAL #35: Unlawful methods of taking furbearers; exceptions. Eliminate Units 1-5 from the trap identification requirement as follows: The Alaska Wildlife Troopers **oppose** this proposal. AWT fully supports a statewide requirement to mark trapping gear as set out in current regulation for specific units. Marking gear with a “confidential” trapper identification number assists law enforcement personnel with identifying illegal gear in the field, has proven effects of reducing trapper violations, and has proved to decrease the incidental take of non targeted species by gear that has not been removed from the field during a closed season. These are positive steps for the trapping industry in promoting good user group relationships and should not be decayed by removing trapping gear identification in areas where it currently exists. Commercial trap tag technology and/or competent individual tag manufacture is such that tags that are attached to trapping gear do not come off through normal field use.

PROPOSAL #36: - 5AAC 85.015(1). Hunting seasons and bag limits for black bear. Amend this regulation in Units 1A, 1B, 1C, 2 and 3: Alaska Wildlife Troopers wish to make the Board of Game aware of the problem that exists in this regulation with the term: “A white colored bear may not be taken”. This term refers to or highly suggests a totally

white colored bear, which would be protected by this regulation from harvest. What recently occurred in the Skagway area was a partially white colored bear (everyone agrees that this bear was the specific individual that the board intended to protect) was taken by a hunter. Because this specific bear had a significant percentage of non-white coloration in its coat, it was determined by biologists and law enforcement personnel that the hunter would not be cited under this regulation. Alaska wildlife troopers request the board to eliminate the protection of an individual animal unless that animal can be specifically identified (marked or tagged). If the board wishes to protect a specific genetic trait in a population of black bears, then law enforcement must have enforceable language that will protect the population in question and support a successful prosecution. Language of this nature will be challenging to develop with out protecting a larger number of bears that the board originally did not intend to protect.

PROPOSAL #43: - 5AAC 92.200(8). Purchase and sale of game. Allow deer to be bartered in Unit 1 as follows: The Alaska Wildlife Troopers would request the board to **take no action** on this proposal. It is common practice with residents through out Alaska to share fish and wildlife resources between family members, friends and neighbors. This activity is traditional in nature and is not visited by enforcement personnel. Law enforcement gets involved when the use of big game meat becomes commercial in nature. In our minds, commercial in nature means trading or bartering big game meat for cash or cash equivalents. There are no recent on going investigations, nor would there be, dealing with the traditional sharing, or trading of legally taken big game meat for legally taken fish products or other wildlife resources between family, friends, or neighbors.

If the board decides to act on this proposal, the board would be requires to define the parameters of the regulation, put limits on the geographical areas, amounts of product, and define what types of trade and barter would be allowed. This determination will have statewide implications and should be done at the appropriate statewide meeting. “Status quo” is working just fine with no involvement in the sharing of resources by law enforcement personnel, and a “take no action” vote is requested by the Alaska Wildlife Troopers. .

PROPOSAL #44: - 5AAC 85.045. Hunting seasons and bag limits for moose. Modify the antler restriction for moose in Unit 1 as follows. Alaska Wildlife Troopers **oppose** this proposal as written. A spike fork/ five point antler configuration is a completely new concept for defining a legal moose. AWT recommends that whatever antler configuration might be adopted, whether it be status quo, or a change to a 2 brow tine or greater on both sides, that configuration be consistent through out the range of the particular moose sub-species population (“andersoni” in this case). Antler restriction violations are the most common big game hunting violation that AWT encounters and judging antler size is the most problematic area for hunters when moose hunting. Making antler restrictions regulations simple and making them pertain to as large of an area as possible is very important to both hunters and enforcement personnel.