



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

Department of Public Safety

DIVISION OF ALASKA WILDLIFE TROOPERS
Office of the Director

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Chairman Ted Spraker
Alaska Board of Game
P.O. Box 115526
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Dear Chairman Spraker:

The following comments give a brief description of the positions that the Department of Public Safety, Division of Alaska Wildlife Troopers have on the proposals that are up for consideration at the February 2014 meeting in Fairbanks.

In general, when the board considers seasons and or bag limit changes, the Alaska Wildlife Troopers request that every effort possible be made to align the season dates and bag limits with adjacent game management units and/or sub units. This is mainly due to enforceability of multiple seasons in multiple locations as well as consistency of the regulations for the public. When the board considers proposals having to do with allocation or biological concerns, AWT is generally neutral in position.

AWT recognizes that regulations are developed by the Alaska Boards of Fish and Game through the public process to support management plans. Further, all management plans rely upon public compliance with regulations to achieve success. Enforcement is a crucial element needed to ensure long-term compliance with regulations by the public. The Alaska Wildlife Troopers request the board recognize that the division has limited resources and man power and any new regulation scheme or area restrictions may place an additional burden on AWT.

Comments on specific proposals are included in this letter.

Thank you for your time.

Bernard Chastain

Captain, Alaska Wildlife Troopers
Anchorage Headquarters

Proposal 64, 73:

Whenever possible, AWT asks the board to consider aligning seasons for enforcement purposes. Both wolverine and Lynx are caught in similar trap sets and it is difficult for enforcement to prove that a trapper is violating unless we catch someone with an animal after the season is closed.

Proposal 67:

This proposal asks the board to modify the GMU boundaries for 18, 19 and 21. In general, Alaska Wildlife Troopers support clarification of any boundary line. Clear boundaries make it easier for the general public to know where they can hunt or trap. Clear boundaries also make it easier for enforcement to identify when a person has violated these boundaries.

Proposal 69:

This proposal asks that the board allow moose hunting guides in GMU's 21D and 24 to select another client if the original applicant is unable to hunt. If the board chooses to pass this regulation, making it only for GMU's 21D and 24 would confuse both the public and enforcement.

Proposal 81:

This proposal asks that the board change the requirements of 5 AAC 92.057 by adding a variety of provisions that would affect sheep hunters in the TMA. The Alaska Wildlife Troopers ask that the board consider this proposal carefully as it adds additional regulatory requirements to non-resident sheep hunters and guides. If the board chooses to pass this regulation, it will be important to craft the regulation to be very specific in order to eliminate confusion by the public and enforcement. Additionally, some of the suggested changes require that the hunter or the guide carry specific paperwork in the field. If the board chooses to add this requirement, the board will also need to add sections that require that the paperwork be displayed upon request from a peace officer.

Proposal 102:

This proposal asks the board to allow the take of an "any bull" Moose in GMU 20A and parts of 20B if the hunters agreed that the bull would count against "two hunters bag limits". Alaska Wildlife Troopers ask that the board examine this proposal carefully. If the board were to pass this proposal as written, there would be numerous additions to the regulation that would need to be added to clarify the intent of the board and make the regulation understandable for the public and enforcement.

Proposal 103:

This proposal asks the board to limit proxy hunting for moose in 20A and 20B to only once per regulatory year. Proxy hunting requires that the hunter obtain proxy paperwork for the

beneficiary. If the board were to pass this proposal, it would be difficult for enforcement to determine (in season) if a person had violated this new regulation. Information would need to be obtained from ADFG regarding the currently issued proxies in order for enforcement to know if someone exceeded the limit for the year. It may be difficult to track these types of activities statewide.

Proposal 114:

This proposal asks the board to eliminate the evidence of sex requirement on black bears in GMU 20B. In hunts where there is a restriction to sex of the animal or hunts which prohibit taking sows accompanied by cubs, enforcement uses evidence of sex to enforce these regulations. Evidence of sex is also sometimes used to determine if a sow taken was lactating or not, which may indicate that the sow had cubs at the time of taking. If the board and ADF&G wish to keep restrictions on taking of black bears in 20B, including reporting and sealing, this tool will help AWT enforce these requirements.

Thank you for the opportunity to respond to these proposals. Additional concerns will be addressed on the record at the board meeting.