



State of Alaska
Department of Public Safety
Division of Alaska Wildlife Troopers

Sean Parnell, Governor
Joseph A. Masters, Commissioner

February 16, 2012

Chairman Judkins
Alaska Board of Game
P.O. Box 115526
Juneau Ak, 99811-5526

Dear Chairman Judkins:

The following comments give a brief description of the positions that the Department of Public Safety, Division of Alaska Wildlife Troopers has on the proposals that are up for consideration at the March, 2012, Alaska Board of Game meetings 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 AWT favors or opposes are included in this letter.

Thank you for your time.

Bernard Chastain

Lieutenant, Alaska Wildlife Troopers
Anchorage Headquarters

Proposal Analysis-

Proposal 46 and 47

In general, AWT has **no recommendation** on this proposal. The justification for allowing the sale of these items is that Alaska Department of Fish and Game feels that the sale of big game trophies would not create a conservation concern through the harvest of specific animals. AWT feels that the sale of trophies and animal parts has been and currently is an enforcement concern. The current regulations are sufficiently complex. Items taken under one system or hunting regime are allowed to be sold while items taken under a different hunting regime are not. If the board decides to allow sale of trophies, the board should discuss the following items on the record so a clear understanding of the intent of the regulation is established.

1. Under the current definition of “trophy” what is the intent of the board? Is the intent to allow sale of ALL big game animals or is the intent to allow the sale of “prepared” or “completed” trophies. If the intent is to allow the sale of “prepared” or “completed” trophies, a definition will need to be created specifying what these terms mean.
2. The board will need to discuss the following situations for sale of big game trophies:
 - a. Will the sale of subsistence taken trophies be allowed? Trophies taken within National Park boundaries, trophies taken from federally managed hunts, trophies taken on federally managed lands?
 - b. Under federal subsistence, hunters are allowed to be a designated hunter for any other federally qualified user. Federally qualified users can take game within park boundaries for other qualified users.
 - c. In areas where trophy nullification is a management tool for large trophy animals, there may be increased pressure on legal and illegal take.
 - d. Who can sell the trophy? Can anyone sell it at any time or are their restrictions? If the board chooses to pass this regulation, it would need to decide if the sale of the trophy is limited to an individual (natural person) or would also include a corporation, group or business (person). Things that should be discussed are; re-sale of trophies by brokers, limited sale or unlimited sale, auctions etc...
 - e. The board will need to discuss if they wish to allow the sale of animals taken under any circumstances such as; potlatch, community harvest permits, cultural permits, road kill or any other permitted hunts.

The board should recognize that if they limit the sale to specific take under certain circumstances, AWT will not be able to determine where the animal was taken and under what “regime” it originated from. Simply stated; it will be very difficult or in some cases impossible for AWT to enforce.

Proposal 211

While proposal 211 is mainly an allocation issue between modes of transportation and different hunting groups, Wildlife Troopers have some concerns; mainly for enforceability if this proposal passes.

This proposal seeks to restrict ATV access during hunting season above 2500 feet elevation in a portion of GMU 20. Wildlife Troopers would have a difficult time determining if a violation has occurred, unless the Trooper was physically there with the person violating. Often times, patrols in the area are conducted by aircraft and contact with the public is sometimes difficult due to landing areas. Additionally, hunters would be required to have a GPS that displayed the elevation of the hunter so they were aware of the elevation at all times. Finally, determining if a violation has occurred after the fact (complaint from the public) would be very difficult for enforcement to investigate.