



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Public Safety

DIVISION OF ALASKA WILDLIFE TROOPERS
Office of the Director

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January 5, 2022

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

Dear Chairman Hoffman:

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 January 2022 meeting in Wasilla.

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 subunits. 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 manpower 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,

A handwritten signature in blue ink, appearing to read "Derek DeGraaf".

Captain Derek DeGraaf
Alaska Wildlife Troopers

Proposal 8

AWT typically support proposals that seek to align opening dates of similar seasons to reduce confusion. However, it was reported by the proposed that *"citations have been issued for failure to salvage and/or surrender other furbearer taken during early coyote season."* According to our records since January 2018, we found only 13 citations for **5AAC92.220(a)(1), Salvage of game meat, furs, and hides**, and of those, only two pertained to coyotes.

Proposal 23

AWT is neutral. As discussed in 2018 for Prop 148, and in 2019 for Prop 42, AWT recommends that the word "position" be defined. Currently, in **5AAC 92.080 Unlawful Methods of Taking Game, (B)(7)** says in Unit 18 a snow machine may be used to position a wolf or wolverine for harvest, without defining position. In (B)(8) it says in Unit 17, a snowmachine may be used to assist in the taking of a caribou. It then defines "assisting." This should be defined on a statewide level to prevent the inconsistencies of having different methods in which vehicles may be used in the taking of game for each GMU. Having a definition of "position" will give users and enforcement a better understanding of what can and cannot be done.

Proposal 64, 65

AWT is neutral. However, this may create an issue of confusion as to who the regulation applies to when hunting in a community hunt. If passed, it should be clarified that the exemption is only for those over the age of 60 when they personally harvest the moose, not the young capable designated hunters also within the "community."

Proposal 66 and 212

AWT is opposed to the proposal. There is nothing confusing about the way the regulation is currently written. It is the State's permit, therefore, per Statute, we set the permit conditions. If you obtain the permit, you agree to abide by its conditions. Changing it to allow some hunters an exemption to a certain permit condition will muddy the waters and likely add some confusion.

Prop 67

AWT is in support of all proposals that assist in the enforcement of salvage requirements. Meat on bone requirements not only aid in preventing spoilage, but also is a deterrent for failing to salvage all edible meat. AWT spends a significant amount of time looking for and investigating kill sites after contacting hunters with a marginal amount of loose bagged meat. Having this requirement aids in the enforcement of salvage requirements and makes it easier to match up all parts of the animal.

Proposal 96

AWT is opposed to the proposal. Increasing same-day airborne occurrences during an open season for sheep/moose gives a plausible defense to the potential same-day airborne hunter. This will also make it challenging to secure a search warrant for other same-day airborne investigations because law enforcement would need to show that a suspect was not bear hunting. If passed, it would be expected that the public would either stop reporting observed same day airborne hunting in this area, or AWT would receive false reports, wasting valuable resources and time. Having it open in 16B only would increase opportunities to do a same-day airborne take in adjacent GMUs and claim it was taken in 16B. This proposal could be less tenuous if same-day airborne take were not allowed during any season open to ungulates. If ADF&G wanted to increase black bear take, they could re-open predator control. Increasing same-day airborne occurrences for general hunting is contrary to fair chase principles.

Proposal 99

This problem exists primarily because dog owners do not have their pets on leash. Any situation that reduces the motivation to keep dogs on leashes has a detriment to both public safety and moose health due to increased dog vs dog fighting, dog vs people attack, dogs chasing moose, and dog vs pack animal attacks. AWT is regularly dispatched to calls for service where moose are agitated due to being chased by unsecured dogs. Enforcement of such a regulation would be very challenging, like our disagreement of proposal 199. How would anyone know if “public funds” were used to fund the trail or campground? Such areas would require new signs and marking. How would a trapper or AWT know if a dwelling was “permanent” or not, or a cabin was “less than 800 square feet” or “unoccupied a majority of the time?” This proposal as written would be very difficult to enforce.

Proposal 198

By implementing a 50-mile distance, the burden on hunters and AWT to figure out cabin locations in such a large footprint would be high. The number of reported violations would be expected to skyrocket, causing a heavy workload on our troopers, possibly taking them away from other more critical resource protection cases.

Proposal 199

In principle, AWT recognizes the safety concerns articulated in this proposal for a 50-yard setback. There are enforcement concerns. Many of these trails are not properly marked, many do not align to what few maps exist currently, sections of trails often “move” in the winter with snow/ice coverage, and when they flood during melt off, determining proper trail location will be challenging. What will be considered the “map” used to document the trail? There is no standard. This would be challenging to enforce until these are notated on a proper publicly accessible map and markings/notifications are in place.

Proposal 228

AWT agrees. There are no other ways in Alaska to passively take fish/game with unmarked devices except by trapping. Crab/shrimp pots, burbot set lines, fish wheels, bear bait stations, gill nets, etc., all require markings. Trappers should be held to the same standard other resource users are. Trap/snare identification would greatly enhance AWTs ability to enforce illegal traps and incidental catches of moose, caribou, and dogs. Secondly, in the instance a trap is stolen or removed the trapper could report this to AWT much like when other resource users call to report shrimp/crab pots stolen or lost. One of the situations that is most common is when a dog is found dead in the trap and the trap is taken with the dog owner. Enforcement is unable to return the trap and there is a lost opportunity to educate and let the trapper know what happened-for the good and bad of it. AWT must also store traps with no leads with no way to return it or issue a citation if warranted. It has been rumored that trappers worry AWT would check their gear for such markings or somehow tamper with their gear. AWT would NOT routinely field check to look for ID number unless warranted. AWT spends an exorbitant amount of time trying to identify the owners of traps in both cases of violation or when stolen. Trapping does not have the same accountability as other resource users. The marking of traps/snares could be done with a unique anonymous number assigned to each trapper to prevent retribution from angry dog owners or anti-trappers if that was a concern. If the number were punched/inscribed onto the trap, it would also aid AWT in recovering stolen traps. Metal tags could also be issued from ADFG. The proposal to have an affixed or stamped means of identification would simply bring this method of take into alignment with ALL other resource users.