



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

**Department of Public Safety**

DIVISION OF ALASKA WILDLIFE TROOPERS  
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Chairman Ted Spraker  
Alaska Board of Game  
P.O. Box 115526  
Juneau, AK. 99811-5526

Dear Chairman Spraker,

The following comments outline the position the Department of Public Safety, Division of Alaska Wildlife Troopers have on the proposals up for consideration during the February 2017 Board of Game meeting in Fairbanks.

When the board considers seasons and/or bag limit changes, the Alaska Wildlife Troopers request every effort be made to align seasons and bag limits with adjacent game management units/sub units creating consistency of the regulations for the public. When the board considers proposals with allocation or biological concerns, we strive to remain neutral.

Alaska Wildlife Troopers recognize regulations are developed by the Alaska Board of Game through the public process to support management plans and rely on public compliance with regulations to achieve success. Alaska Wildlife Troopers respectfully request the board recognize any new regulation or area restriction may result in additional burdens on Alaska Wildlife Troopers due to our limited resources, personnel and budget.

Sincerely,

*Paul L. Fussey*  
Lieutenant, Alaska Wildlife Troopers

**Alaska Wildlife Troopers Responses to the Board of Game Proposals  
Fairbanks 2017  
Interior & Northeast Artic Region Meeting**

**PROPOSAL 47 5 AAC 92.990(26). Definitions.** Change the definition of “edible meat” for game birds as follows:

"Edible meat" means, in the case of a big game animal, except a bear, the meat of the ribs, neck, brisket, front quarters, hindquarters, and the meat along the backbone between the front and hindquarters; in the case of a bear, the meat of the front quarters and hindquarters and meat along the backbone (backstrap); **for all game birds, the meat from the breast, back, thighs, legs;** [IN THE CASE OF SMALL GAME BIRDS, EXCEPT FOR CRANES, GEESE AND SWAN, THE MEAT OF THE BREAST; IN THE CASE OF CRANES, GEESE, AND SWAN, THE MEAT OF THE BREAST AND MEAT OF THE FEMUR AND TIBIA-FIBULA (LEGS AND THIGHS);] however, "edible meat" of big game or small game birds does not include meat of the head, meat that has been damaged and made inedible by the method of taking, bones, sinew, incidental meat reasonably...

**What is the issue you would like the board to address and why?** Define edible meat for all game birds in Units 12, 18, 19, 20, 21, 22, 23, 24, 25, 26A, 26B, and 26C to reduce or eliminate wanton waste of migratory birds.

During the spring 2015 Alaska Migratory Bird Co-Management Council (AMBCC) meeting wanton waste language was adopted similar language for the spring/summer subsistence harvest season defining edible meat “human consumption” as: the meat from the breast, back, thighs, and legs. We would like to place the wings, gizzard and heart in the category of “human use” which would allow these part to be used by humans for non-edible purposes, e.g., trapping. However, the head, neck, feet, other internal organs and skin are optional.

The Alaska Wildlife Troopers do not support this proposal as it would create 2 separate definitions for edible meat pertaining to game birds. The proposer seeks to change the definition under 5AAC 92.990; however, they are only asking for it to apply to certain areas. The Alaska Wildlife Troopers respectfully ask the board to consider possible enforcement complications with this proposal. An individual traveling on the Nebesna Rd. from unit 11 to 12 would have separate salvage requirements. There is currently not a definition for human use under 5AAC 92.990, which further compounds the enforceability of this proposal. The Alaska Wildlife Troopers request every effort be made to align seasons and bag limits with adjacent game management units/sub units creating consistency of the regulations for the public. The current definition of edible meat was created by the board in July 2014 and is statewide not regional.

**PROPOSAL 77 -5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Increase the bag limit for brown bear in Unit 21E as follows:

Unit 21E Resident Hunters 2[1] bears every regulatory year

**What is the issue you would like the board to address and why?** We would like to see a two brown bear limit in Unit 21E. There is an overabundance of this resource in our subunit, and it is our belief that more residents would take advantage of utilizing this resource if they were able to sell the skulls and hides of brown bears. This would benefit both the residents of our area by the potential to bring some money into our communities as well as to increase the take of brown bears that also prey on the same game animals we depend on as well. In the long term there is the chance that having residents take more brown bears will keep Unit 21E from having to resort to instituting the intensive management program that is written into the Innoko Moose Management Plan by helping to potentially increase moose survival in this unit.

**PROPOSED BY:** Grayling, Anvik, Shageluk, and Holy Cross Fish and Game Advisory Committee

The Alaska Wildlife Troopers are neutral on this proposal regarding increasing the brown bear limit from 1 to 2. Last year at the statewide meeting the board passed proposal 57 which allowed the sale of brown bear hides and/or skulls by resident hunters as follows:

Statewide; allow resident Alaskan hunters to sell the hides with claws attached and/or skulls of legally taken brown bears harvested in units where the bag limit is two or more bears per season.

This proposal created an enforcement dilemma as some areas around the state are allowed to sell brown bear hides and other areas are still prohibited. At the Bethel meeting the department advised the board they plan to submit a proposal at the statewide meeting to implement a mandatory sales tag. The Alaska Wildlife Troopers respectfully ask the board to keep this in mind when debating this proposal as a sales tag is currently optional and not mandatory.

**PROPOSAL 100 5 AAC 92.085. Unlawful methods of taking big game; exceptions.** Institute no-fly zones for caribou hunting in Units 21D, 22, 23, 24, & 26A as follows:

Aircraft restricted to only Friday, Saturday, Sunday and Monday. This will leave Tuesday, Wednesday and Thursday to a no-fly zone allowing local villagers to have quiet hunting times and no aircraft noises. This proposal will affect Units and Subunits of 21D, 22, 23, 24 and 26A. Hunters in this area because of weather will need to be prepared to carry with them three days of provisions in case aircraft can't get in to get them out of the area.

**What is the issue you would like the board to address and why?** Western Arctic caribou herd (WAH) declining population numbers. During the WAH meeting in December 2015 and the Regional Advisory Council meetings March of 2016 in Anchorage, information released to the public shows numbers going from 495,000 to 235,000 animals. Local people think aircraft are part of the reason. They attempted to try a correction with proposal WSA16-01.

The Alaska Wildlife Troopers do not support this proposal as it would be extremely hard to enforce. This proposal, if passed, can only be enforced by checking all aircraft for possible caribou. The Department of Public Safety is the lead agency for search and rescues in the state. The restrictions in flying imposed by this regulation have the potential to create life threatening situations

and thereby creating a search and rescue mission for stranded hunters. This proposal fails to address a specified time during the calendar year and would be in effect year round. This proposal would not prohibit an individual or professional business from conducting hunts for moose, bear, or other game during the aircraft restriction dates. This proposal would create an undue burden on the Alaska Wildlife Troopers and their dwindling budget.

**PROPOSAL 101 -5 AAC 92.XXX.** Create a regulation allowing the harvest of moose under a permit for “celebration of life” events as follows:

The Gwichyaa Zhee Gwich’in Tribal Government (GZGTG) is allowed to harvest moose under a permit issued by the Alaska Department of Fish & Game for a “Celebration of Life” event.

**What is the issue you would like the board to address and why?** Funerary and mortuary moose are provided for in 5 AAC 92.019. Moose is customarily used in celebratory events as well, where many community members gather for potlatches and feasts, not associated with a person’s passing.

Current regulations that allow harvest of moose for funerary and mortuary purposes do not fulfill the requirement of all Gwich’in ceremonies and gatherings. Gwich’in people are historically generous people and Fort Yukon has been a gathering point for fishing and trading since time immemorial.

While the Tribe does have memorial potlatches to honor those that have passed away we would also like to use moose for positive traditional celebrations.

This regulation will enable the Tribe to continue to honor tradition without having the sadness of death be the center of the celebration we also celebrate the changing of seasons, the bountiful harvest and changes that it will bring.

Events may include, but are not limited to, GZGTG Annual Meeting (enrolled Tribal Members vote for first and second Chief and Council Members, one full day), GZGTG Holiday Potlatch (Christmas Eve – New Year’s Day, 5–9 days, everyone welcome, made possible through donations and volunteers), Spring Carnival Potlatch, (region-wide, everyone welcome, 5–8 days long, daily meals), Community Fall Harvest/Agricultural Fair Potlatch, and Community Spring clean-up potlatch.

**PROPOSED BY:** Yukon Flats Fish and Game Advisory Committee (EG-F16-039)

The Alaska Wildlife Troopers understand the cultural significance of potlatches and the taking of big game for certain ceremonies afforded under 5AAC 92.017 & 5AAC 92.019 and are not opposed to these regulations. The Alaska Wildlife Troopers understand the proposer seeks to create a new permit for events; however, a similar regulation allows the take of animals for cultural education under 5AAC 92.034 with the use of a cultural permit application. A link to the permit applications, procedures, and policies, are already included on the department’s website. The permit conditions require a permittee to show, upon request, the permit to a state enforcement officer under section (c). For the ease of tracking and enforcement the Alaska Wildlife Troopers ask the board to take no action on this proposal as a current regulation already exists.