



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Public Safety

DIVISION OF ALASKA WILDLIFE TROOPERS
Office of the Director

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

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 January 2019 Southeast Region regulations meeting in Petersburg.

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,

Aaron Frenzel

Lieutenant Aaron Frenzel
Alaska Wildlife Troopers

Proposal 2

The proposal seeks to allow the use of food plots on private property to feed deer and as a lawful method and mean to take deer in GMU's 1-5.

The Alaska Wildlife Troopers oppose this proposal and others like it that change the lawful methods and means by which animals can be taken by on private lands verses public lands. If the board determines to make this a lawful method, we suggest that the regulations should be similar to bear baiting and require a permit that includes season dates.

Proposal 3

This proposal seeks to remove the salvage requirements for the rib meat of deer in GMU's 1-5.

Consistency statewide regarding parts of game that are required to be salvaged as edible meat should be strived for. Making salvage requirements different for one species in specific game management units can create more confusion amongst hunters. The Alaska Wildlife Troopers rarely have enforcement issues with hunters leaving rib meat in the field, what is more often seen is meat, including ribs, dumped along the roadways after they are removed from the field.

Proposal 4

This proposal seeks to remove restriction of taking big game from a boat in GMU's 1-5.

The Alaska Wildlife Troopers are neutral on this proposal but do have safety concerns due to the amount of vessel traffic and hunters along the beaches.

We would like to clarify the regulations relating to the taking of game animals from boats in Alaska. GMU's 1-5 are the only units that restrict all big game animals from being taken from a boat and GMU 6(D) restricts taking of black bear from a boat. The Alaska Wildlife Troopers do not believe that it is common for hunters in GMU 1-5 to shoot from boats, but rather a small group of unlawful hunters choose to commonly shoot deer from boats.

Proposal 6

This proposal seeks to remove the salvage requirements for black bear hides in GMU's 1-5 for residents only.

The board should consider the potential issues with making salvage requirements different for resident and nonresidents. If salvage requirements are not the same, Troopers will find themselves dedicating time into looking into what could be a fail to salvage case if it is a nonresident kill site, to potentially find out later it was a resident harvest. If the board chooses to pass proposal 7, the resident hunter sealing requirement, then proposal 6 is mute, since 5AAC92.220(a)(4) already exempts a hunter from hide salvage requirements in areas where sealing is not required.

Proposal 7

This proposal seeks to remove the sealing requirements for black bear hides in GMU's 1-5 for residents only.

The board should consider the potential issues with making sealing requirements different for resident and nonresidents. When sealing requirements in an area are removed from black bear, per 5AAC92.220(a)(4) the salvage requirements for the hide and skull are also removed. For reasons mentioned in proposal 6, this could lead to wasted investigative time when locating kill sites with hides and skulls not salvaged.

Proposal 13

This proposal seeks to require identification tags for traps and snares in GMU's 1-5.

Identification requirements for gear left in the field or water is common in almost all activities relating to the taking of Alaska's fish and wildlife resources. When Troopers find gear that is set unlawfully the required identification is many times the only way we would ever know whose gear it is and thus giving us a lead for our investigation. Over the past few years there has been several closed season or area trapping incidents in GMU's 1-5 that no leads were developed in due to not knowing who was responsible for the trap.

In most remote areas of the state Troopers know who is trapping an area and these are not the areas where we have issues determining who might have left sets out after season. Most of these incidents occur on or relatively close to the road systems where multiple trappers are operating on foot and within close proximity of each other. Having a trap identification requirement gives enforcement a way to identify who is operating gear in these more populated areas for both investigative purposes and when conflicts arise between trappers.

Proposal 19

This proposal seeks to close an area around portions of the Greens Creek Mine road to all hunting.

The Alaska Wildlife Troopers are neutral on this proposal and passing this regulation as written would not prevent some of the public safety concerns brought up in the proposal that the proposer would like addressed. The Alaska Wildlife Troopers would not be able to prevent the public from transiting the road system for access to areas off the road to hunt, thus not preventing the vehicle and hunter conflicts. The proposal if passed would only prohibit hunting within ¼ mile of the roadway.

Currently the City and Borough of Juneau has in place Ordinance 42.20.050, regarding the discharge of firearms. The ordinance prevents the discharge of firearms within one quarter mile of a roadway within the City and Borough of Juneau. The Juneau Police Department is the primary enforcement authority of their ordinance and criminal issues, to include public safety concerns, along the Greens Creek Road system is their responsibility unless a violation of State hunting regulations occurs.

Proposal 21

This proposal seeks to amend the area closed to big game hunting on Douglas Island.

The Alaska Wildlife Troopers support this proposal and others that make clear geographical boundaries to limit confusion amongst hunters.

Proposal 28

This proposal seeks to require ADF&G to issue black bear baiting permits when it is already a lawful method and mean for the area.

The Alaska Wildlife Troopers are neutral on this proposal. If this were passed the Alaska Wildlife Troopers would enforce this as we do in other areas of Alaska where baiting is already permitted. The board and ADF&G should consider if ADF&G has the authority to allow an activity that a city or borough prohibits within their city limits.

The proposal states that this would allow hunters who do not have access to boats more opportunity to harvest spring black bear. Within GMU 1-C sits the cities of Juneau and Gustavus, where a majority of non-boat owners would live. ADF&G should check with these local governments to see whether their ordinances allow for the use of bait within the city limits. For example, the City and Borough of Juneau (CBJ) has in place ordinance 36.20.056, that states “no owner or person in charge of property shall cause or allow the creation or maintenance of a bear attraction nuisance on that property or adjacent right-of-way”. Per this ordinance on land owned by the State of Alaska that is within the CBJ, the State may not allow what the CBJ deems a “bear attraction nuisance” on that property.

Proposal 41

This proposal seeks to require hunters in GMU 2 to attach the harvest ticket to a deer until the location of processing.

The Alaska Wildlife Troopers oppose this proposal due to foreseen enforcement concerns and confusion amongst hunters.

Currently 5AAC92.010(b) requires the harvest ticket to remain in possession of the hunter until the animal is delivered to the location where it is processed for human consumption. This allows Troopers to check validated harvest tickets in the field when we contact the hunter, whether or not they have the deer with them. If the proposal passed as written, AWT could find themselves contacting hunters with partial loads of meat and no harvest ticket due to it being attached to parts that have not been removed from the field.

Changing this regulation for a specific area and animal will likely lead to more confusion for hunters that hunt both GMU 2 and adjacent GMU’s. There would be further issues when contacting federal subsistence qualified hunters that could be hunting either under federal or state regulations depending on the specific location where they harvest the animal within GMU2.

Currently harvest tickets can be obtained on-line and printed immediately, the paper commonly used in a at home printer rarely holds up in the environment. There would be a high probability that hunters would lose harvest ticket off an animal coming out of the field.

The Alaska Wildlife Troopers do believe that there are some people that fail to validate harvest tickets until they see a Trooper approaching. This issue is not unique to GMU 2, and we believe that this occurs more with deer than other big game animals. Without costly changes that would require a locking tag to be attached to an animal, it will be hard to ever prevent issues currently seen with failing to validate harvest tickets.

Proposal 53

This proposal seeks to modify the hunting area of the Petersburg Management Area by expanding the area which would then create a longer season for deer harvest by bow and arrow in a strip of land that currently closes on October 31 and is open to all lawful methods and means.

The Alaska Wildlife Troopers are neutral on this proposal. As this proposal is written it is asking the board to expand the Petersburg Management Area (PMA). Currently the north and west sides of the PMA begin at least ¼ mile from any airport, highways, roads or streets within the corporate city limits. This makes ¼ mile strip around infrastructures outside of the PMA and open to hunting by any lawful method and means. The City of Petersburg has its own ordinances in place that prohibits the discharge of firearms from the eastern and southern boundary of the PMA to the shoreline on the northern and western end of Mitkoff Island. Between state regulations and city ordinances it has created an area that is open to means other than firearms outside of the Petersburg Management Area.

The bow and arrow season for deer within the PMA is open October 15 through December 15 with a bag limit of two bucks and the remainder of Mitkoff Island is open October 15 through October 31 with a bag limit of one buck.

Currently in the area surrounding ¼ mile of any airport, highway, road or street within the corporate city limits is not within PMA and therefore the season closes October 31 with a limit of one buck. By reducing boundary from ¼ mile to 100 yards it will extend the season in much of this area, increase the bag limit and make the use of other methods like crossbows unlawful.

As stated before the Alaska Wildlife Troopers prefer clear geographical boundaries. If ADF&G has no concerns with an extended season and increased bag limit in the main town area of Petersburg, then AWT sees no reason why the PMA does not extend to the north and west all the way to the coastline of Mitkoff Island. This area is already open for hunting under state law, so by making this change would only limit the methods able to be used to bow and arrow along with changing the season and bag limit.