December 23, 2019

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 2020 Western Arctic and Western Region regulations meeting in Nome.

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 18

The proposal seeks to allow the use of the edible meat from the back and wings of swan, geese and crane to be used as bait.

AWT opposes this proposal as it stands for a single game management unit but would be neutral on this proposal if it were a state-wide proposal. When making salvage and use requirements unit specific it makes enforceability difficult and can cause confusion for users, especially those who live or operate near game management unit borders. If passed as proposed the board should consider if the use of edible meat is allowed in GMU 18 when the bird is taken in a different game management unit, or if the take and the use must both be completed in GMU 18.

Proposal 42

This proposal seeks to add grizzly bear to the list of animals in GMU 22 that may be positioned by a snow machine.

The Alaska Wildlife Troopers remain neutral on this subject but encourage the board to define the word “position” as it is used in 5 AAC 92.080(4). This should be done 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 169

This proposal seeks to clarify that big game tags must be previously purchased and issued prior to hunters taking big game animals that require tags.

This proposal was submitted as an agenda change request by the Alaska Wildlife Troopers and accepted as a proposal. For reasons stated in both the ACR and the proposal, we support the board clarifying the intent that tags must be purchased prior to the take, which includes pursuit, of an animal in which a tag is required. The board should make a clear definition of what previously purchase means so that it is enforceable.