



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Public Safety

DIVISION OF ALASKA WILDLIFE TROOPERS
Office of the Director

5700 East Tudor Road
Anchorage, Alaska 99507-1225
Main: 907.269.5509
Fax: 907.269.5616

March 3, 2023

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

Dear Chairman Burnett,

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 March 2023 meeting in Soldotna.

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 "Chris E. Jaime".

Lieutenant Christopher E. Jaime
Alaska Wildlife Troopers

PROPOSAL 65

AWT is neutral with this proposal, there are no enforcement or public safety concerns. However, if passed, this would increase the complexity of the Kodiak goat hunting regulations by creating a separate season, separate hunt area, and a separate bag limit for this area. Increased complexity is always a challenge for resource users and enforcement alike, however, the regulations themselves would not be any less enforceable than the regulatory scheme already in place. AWT does have concerns with using the DB107 boundary as suggested in the proposal for this new goat area. Potential enforcement challenges exist when goat area boundaries are based off ridgelines as opposed to river drainages.

If adopted, AWT recommends the unit boundaries be modified to use drainages instead of ridgelines.

PROPOSAL 74

AWT is in support of this proposal and 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. Having this requirement aids in the enforcement of salvage requirements and makes it easier to match up all the animal's parts. AWT would recommend all four quarters on the bone; backstraps, tenderloins, ribs and neck meat may be removed.

Additionally, we suggest the language "until processed at a land-based location" be removed and substituted with "...until the meat has been transported from the field or is processed for human consumption", again, to mirror the language already used in **5AAC92.220(d)** and to eliminate any confusion about whether this proposal as it is currently written would make it illegal for hunters to consume part of their deer while in camp or on a vessel.

PROPOSAL 98

AWT is neutral on this proposal as it pertains to enforcement, however the Rainbow Creek Drainage is a popular hiking area with limited access. The interaction between hunter and hikers in the Drainage may result/turn into a public safety concern.

PROPOSAL 99

AWT is neutral on this proposal as it pertains to enforcement, however the McHugh Creek Drainage is a popular hiking area with limited access. The interaction between hunter and hikers in the Drainage may result/turn into a public safety concern.

PROPOSAL 103

AWT is opposed to the creation of this hunt due to McHugh Creek's proximity to Anchorage and the large number of hikers which frequent the area. By allowing bear baiting stations in this drainage, it will lure more bears to the area and increase the frequency of wildlife-human encounters. Additionally, this terrain would make it extremely difficult to be a quarter mile from the maintained trail system.

PROPOSAL 106

AWT supports the deletion of motorized vehicle restrictions in 15C. Enforceability has always been an issue with the regulation. The Lower Kenai Controlled Use Area adds complexity to the hunting regulations on the Kenai Peninsula, AWT supports consistency throughout GMU 15.

PROPOSAL 123

AWT is neutral on this proposal, however if the Board adopts this proposal AWT would encourage consistent dates within GMU15 which would alleviate confusion and assist with enforceability.

Currently in GMU 15A and 15B the regulations allow for a *Bow and Arrow only* hunts from August 22 – August 29.

PROPOSAL 143

AWT opposes this proposal, this will increase public safety concerns of introducing high powered rifles into residential/semi-residential structures. Additionally, allowing bear baiting in such proximity to structures will inevitably lure more bears which may increase wildlife-human interactions. Additionally, this proposal would be inconsistent with statewide regulations.

PROPOSAL 144

AWT supports the Board defining the terms “Developed Recreation Facility” and “Permanent Dwelling”. However, AWT does not support the suggested definitions. This proposal’s definition of “Developed Recreational Facility” is onerous and neglects facilities maintained by other entities (i.e. USFS, USF&W, Private Campgrounds etc.). This proposal’s definition for “permanent Dwelling” with the stipulation of being “occupied for a minimum of 30 days” would be unenforceable.

PROPOSAL 147

AWT is opposed to this proposal due to the lack of enforceability. Ski trails / multi-use trails change as the season progresses. The 100-foot setback would be very difficult to enforce, AWT does not maintain detailed maps of “established public trails”. This regulation would essentially allow a “Club” to dictate areas closed to trapping based on large scale maps which have not been surveyed.

PROPOSAL 160

AWT opposes this proposal due to the enforceability and the additional regulatory changes along with definitions this would require. AWT asks the Board to establish if the lodge may only have one set around it or if the trapper can only have one set at a lodge. If adopted Board should clearly define what “one set” is or limit number of traps/snares that can be set.