



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Public Safety

DIVISION OF ALASKA WILDLIFE TROOPERS
Office of the Director

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Chairman Burnett
Alaska Board of Game
P.O. Box 115526
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Chairman Burnett and Board of Game Members,

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 Southeast Region meeting in Ketchikan.

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,

Aaron Frenzel

Captain Aaron Frenzel
Alaska Wildlife Troopers

Proposal 1

This proposal seeks to add hunter education requirement in GMU's 1-5.

AWT opposes this proposal as written due to the increased regulatory complexity it would create for GMU's 1-5. The proposal is not clear on the intent of hunter education requirements for those under the age of 18. As written, it would be lawful for two 17-year-old resident hunters to hunt together, and neither would be required to have hunter education if they purchased a resident license. Even though a 17-year-old resident is not required to have a license, nothing says they may not obtain one, thus creating a gray area in the proposal. Further confusion may arise between resident and non-resident requirements.

If the board chooses to adopt hunter education in the Southeast Region, AWT supports the recommendations brought forth by ADF&G in their staff comments.

Proposal 15

This proposal seeks to correct the description of the Petersburg Road System Closed Area.

AWT supports this proposal, having clear and identifiable locations of closed areas makes it easier for the public and enforcement.

Proposal 20

This proposal seeks to divide Etolin Island into two hunt areas for the October elk hunts.

AWT is neutral on the allocative aspect of this proposal but recommends the board clearly define where the line between Anita Bay and Burnett Inlet will be if passed. Elk hunters at times will use the road system out of Anita Bay to access hunting areas. The proposed language is broad as written and could lead to confusion on where the line is that separates the two areas.

Proposal 21

This proposal seeks to eliminate the regulation that a damaged, broken, or altered antler is not considered a spike-fork antler in parts of the Southeast region.

AWT opposes this proposal, this regulation was passed by the Board in 2006 after a growing concern of antlers being intentionally altered into a spike-fork configuration after an animal had been harvested. The original proposal was a joint proposal by AWT and ADF&G. Determining if an antler was damaged or broken before being harvested or altered after is difficult to prove for enforcement. The current regulation as written makes it so that if the antler is naturally broken/damaged or intentionally altered, it would not be considered a spike-fork. AWT sees on average very few antlers a year that are broken, damaged, or altered into a spike-fork configuration and are not lawful to take due to this regulation.

Proposal 23

This proposal seeks to allow the use of electric bikes that are below 750 watts in the GMU 1B portion of the RM038 moose hunt.

AWT is neutral on this proposal but after consideration of proposal 22 and if this proposal is taken up AWT would recommend the board consider clearly defining electric bikes.

Proposal 27

This proposal seeks to require a 100-yard no trapping setback around hiking trails and drivable surfaces of Wrangell Island in GMU 3.

AWT is neutral on this proposal, but without identifying specifically which trails and drivable surfaces, or creating additional definitions this proposal as written can create confusion. If passed and the intent is to prevent trapping around all constructed roads, then using a term like “highway” that is already defined in 5AAC 92.990 would be preferred, this would include logging roads that are no longer in use. On the other hand, if it is to be around currently maintained trails or roads, then mirroring the language used for bear baiting in 5AAC 92.044 and stating a “publicly maintained road or trail” would be preferred.