



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

**Department of Public
Safety**

DIVISION OF ALASKA WILDLIFE TROOPERS
Office of the Director

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Mr. Jake Fletcher
Chairman – Alaska Board of Game

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Mr. Chair and members of the board. Please see the attached comments from the Department of Public Safety, Division of Alaska Wildlife Troopers (AWT) concerning proposals before the board during the upcoming Southcentral Alaska area Board of Game meeting. AWT recognizes that regulations are developed by the Alaska Boards of Fish and Game through the public process to support management plans. Management plans rely upon compliance with regulations to achieve success and enforcement is a crucial element 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 and directly impact enforcement efforts in other areas of concern. AWT generally is neutral in position on proposals having to do with allocation or biological concerns and will not have a written comment except when concerns exist in proposed language that may cause unintended enforcement challenges. AWT generally is opposed to changes which are viewed as having a negative impact on the divisions' ability to enforce existing or future regulations.

PROPOSAL 73

5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures.

Define the terms "permenant dwelling", "publically maintained trail/road", and "developed recreational facility" for the purpose of bear baiting as follows:

AWT is **Neutral** on this proposal. Such a change related to a statewide regulation should apply statewide and not just to some regions or units. It is true there is no regulatory definition for the term “permanent dwelling” or “developed recreational facility”, and if the board determines a need to define the terms, it would need to apply statewide and not just within the scope of this board meeting.

PROPOSAL 74

5 AAC 92.130. Restrictions to bag limit.

Count a wounded bear against a hunter's bag limit regionwide as follows:

AWT **Supports** alignment of regulations across units whenever possible for consistency.

PROPOSALS 97-104

5 AAC 92.540(4)(B). Controlled use areas.

Eliminate/Modify the restriction on motorized vehicles for hunting moose in the Lower Kenai Controlled Use Area in Unit 15C...

Various proposals to either eliminate the Controlled Use Area or make changes to existing areas within or restrictions within the CUA.

AWT in **Neutral** on these proposals, but **Supports** change to reduce regulatory complexity and enforcement challenges. The LKCUA regulations are confusing to resource users and many of the restrictions are nearly unenforceable due to the litany of exceptions that have been added or carved out over the years. Current issues include; variable short windows where a moose hunter is allowed and then not allowed to use motorized vehicles, exceptions where people may claim they are hunting open species and may use motorized vehicles in the same locations where moose hunters may not. AWT receives numerous complaints of potential violations annually from local residents and hunters who report seeing people on off-road vehicles during closure periods in full camo gear at all hours of the day and night. Unless AWT catches a person actively transporting a moose, a person merely has to claim they are not hunting moose and no enforcement action can be taken.

AWT **Opposes** portions of proposals 103 and 104 that would add complexity and additional exceptions to the existing regulations by adding time periods during closed periods when vehicle use would be allowable.

PROPOSAL 148

5 AAC 92.550(9). Areas closed to trapping.

Require signs be posted at all access points to active trapping in Unit 7, as follows:

AWT **Opposes** this proposal as written. If signs are to be required the preference would be that this be a statewide regulation vs. unit specific. Trappers are already encouraged to post signage indicating active trapping locations, but making this a requirement presents numerous enforcement concerns. The signs can be lost due to weather such as high winds, or torn down by an animal or another person. If passed as written, the board would need to determine the definition of "all access points"? Does this refer to the primary access off an established road or trail, or any possible access point to a trapline from any direction or location?

PROPOSAL 150, 197, 244

5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

Require identification tags on traps and snares in various areas/units:

AWT **Supports** a statewide trap ID requirement for consistency and to aid enforcement, but is **Neutral** on these proposals. AWT feels that such a change should be a statewide or regionwide requirement and not selectively imposed on individual units/subunits or species as this adds regulatory complexity and may cause confusion to trappers.

Thank you for the opportunity to offer comments to the board. A representative from AWT will be available throughout the board meetings and deliberations to answer questions from board members.

Sincerely,



Brent Johnson

Captain – Alaska Wildlife Troopers – AWT BOG Liaison