



State of Alaska

Department of Public Safety

Division of Alaska Wildlife Troopers

Sean Parnell, Governor
Joseph A. Masters, Commissioner

October 5, 2009

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

Dear Chairman Judkins:

The following comments give a brief description of the position that the Department of Public Safety, Division of Alaska Wildlife Troopers has on the proposals that are up for consideration at the fall 2009, Alaska Board of Game 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 AWT favors or opposes are included in this letter. Please contact me if you have any questions.

Thank you for your time.

Bernard Chastain

Lieutenant, Alaska Wildlife Troopers
Anchorage Headquarters

Proposal Analysis-

1. Proposals #4 and #5: Support

Alaska Wildlife Troopers support Proposals #4 and #5. These proposals seek to eliminate the confusion for hunters and law enforcement when attempting to determine the boundaries of the Kuskokwim hunt area. This proposal will clarify hunt boundaries. AWT supports regulations that make it easier for hunters to determine their hunt areas. AWT also supports proposals that make regulations clear and easy to understand, which in turn makes enforcement easier.

2. Proposal #9: Neutral

Alaska Wildlife Troopers are neutral on proposal #9. Proposal #9 seeks to open same day Caribou hunting in GMU 22.

3. Proposal#13: Support

Alaska Wildlife Troopers favor proposal #13 which seeks to align seasons for Brown Bear in GMU 22. This proposal will align GMU's 22B, 22C, 22D and 22D southwest. This will assist in enforcement of the brown bear season by having a season that ends on the same dates in adjoining GMU's.

4. Proposal #30: Support

Alaska Wildlife Troopers support Proposal #30 which seeks to align Trapping seasons for mink and weasel in GMU 26A with GMU's 22 and 23. This proposal will align seasons with adjoining GMU 23

5. Proposal #34: Oppose

Alaska Wildlife Troopers oppose proposal #34 which seeks to modify the definition of edible meat so that it does not include meat that has been made inedible because of diseases in the animal. Alaska Statute 16.30.010 speaks to wanton waste of big game animals. This statute states in part that:

“It is a Class A Misdemeanor for a person who kills a big game animal or a species of wild fowl to fail intentionally, knowingly, recklessly or with criminal negligence to salvage for human consumption the edible meat of the animal or fowl”.

Wanton waste is arguably the most egregious and morally unethical hunting crime. If this proposal is passed to change the definition of edible meat, it will make wanton waste and fail to salvage statutes and regulations nearly unenforceable. This modified regulation, while written to only apply to GMU's 23 and 26A, will possibly apply to all hunters statewide; effectively making legal, leaving any animal the hunter does not want to salvage to rot in the field. A

possible legal defense of someone leaving game meat in the field anywhere in the state would be that hunters in other parts of the state can legally leave “diseased” meat. This will create an obvious double standard and leave a regulation loophole to be abused. Hunters will be left to decide for themselves when they have a diseased animal and how much, if any, they want to salvage. Who will decide when the animal is diseased? Hunters will have a different opinion on when an animal is considered diseased or not. Enforcement will be unable to return to each kill site to take meat samples and determine if the animal was diseased or not. Alaska Wildlife Troopers will lose the necessary tools needed to successfully prosecute criminals who leave meat in the field. Current state regulations require hunters to salvage meat from the field for human consumption. Any deviation from this requirement will support waste of game meat. AWT strongly opposes proposal #34.