



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

Department of Public Safety

DIVISION OF ALASKA WILDLIFE TROOPERS
Northern Detachment

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Chairman Johnstone
Alaska Board of Fisheries
P.O. Box 115526
Juneau Ak, 99811-5526

Dear Mr. Chairman:

The following comments give a brief description of the positions that the Department of Public Safety, Division of Alaska Wildlife Troopers (AWT) has on the proposals that are up for consideration at the Prince William Sound and Upper Copper/Upper Susitna Finfish meeting Cordova.

In general, when the board considers seasons, bag limit and methods changes, the Alaska Wildlife Troopers request that every effort possible be made to align the regulations consistently region wide. This is mainly due to enforceability of multiple regulation schemes in one area and to minimize the confusion of the regulations for the public. When the board considers proposals having to do with allocation, management or biological concerns, AWT is generally neutral in position and does not comment.

AWT recognizes that regulations are developed by the Alaska Boards of Fisheries and Game through the public process to support management plans. Further, all management plans rely upon public compliance with those regulations to achieve success. Enforcement is a crucial element needed to ensure long-term compliance with regulations by the public. The Alaska Wildlife Troopers requests that 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.

Sincerely,

A handwritten signature in black ink that reads "Burke Waldron".

Captain Burke Waldron
N Detachment Commander
Alaska Wildlife Troopers

Proposal 3 – Passing this proposal increases the potential for gear length restriction violations. Further, passing this proposal would create an area specific exception to a statewide regulation resulting increased regulatory complexity.

Proposal 4 – Without language requiring a fisher to stop fishing for all species once the limit of king salmon is reached this proposal would be difficult to enforce.

Proposal 5 – Though this proposal is allocative in nature, if passed AWT would have limited resources to enforce the high likelihood of violations. Further, AWT supports the use of GPS coordinates over landmarks or markers to establish lines and boundaries for enforceability reasons. Coordinates are more specific and can not be moved or eliminated without ADF&G or Board action.

Proposal 6 – If passed, the prohibition must include all species, not just salmon, for enforceability reasons.

Proposal 8 – Though allocative in nature, if passed, this proposal would make the bag limit more consistent with the adjacent North Gulf Coast waters. If amended to include making the possession limit the same as the adjacent waters as well the proposal would be more enforceable.

Proposal 8 – If passed as written the proposal would be difficult to enforce. To be enforceable, a gear definition, or something similar, specific to the bait species would have to be adopted.

Proposal 18 – If passed, this proposal would be difficult to enforce. To measure accurately, the net would have to be hung on land and, at a minimum, several sample sections of the web throughout the length of the net, if not the entire net, would have to be counted. This would be a very time consuming process.

Proposal 19-21 – These proposals are allocative in nature. However, as currently written, the regulation can be difficult to enforce.

Proposal 22 - Whenever possible, AWT supports the use of GPS coordinates to establish lines and boundaries for enforceability.

Proposal 24 – This proposal clarifies the current regulations and enhances enforcement.

Proposal 28 – This proposal is allocative in nature. However, if passed, the proposal offers clarifying information and reduces regulation complexity which enhances enforcement.

Proposal 29 – As currently written, this proposal is not enforceable. Once a fish is on board the vessel AWT would have no way of determining at what depth it was caught.

Proposal 32 - Whenever possible, AWT supports the use of GPS coordinates to establish lines and boundaries for enforceability.

Proposal 48 - Whenever possible, AWT supports the use of GPS coordinates to establish lines and boundaries for enforceability.

Proposals 50, 51 - Gear and bait restrictions are difficult to enforce when limited by species, not body of water.

Proposal 53, 57 - These proposals clarify the current regulations and enhances enforcement.