



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Public Safety

DIVISION OF ALASKA WILDLIFE TROOPERS
Office of the Director

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Chairwoman Carlson-Van Dort
Alaska Board of Fish
P.O. Box 115526
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Madam Chair and Board of Fish Members:

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.

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 Statewide Finfish meeting in Anchorage.

Thank you for your time,

Aaron Frenzel

Captain Aaron Frenzel
Alaska Wildlife Troopers

Proposal 82: This proposal seeks to modify the dates allowed for the sinking of gillnets in the Yukon Area.

During both aircraft and vessel patrols visible floats on the water aid in identifying where gear is located during open periods. When fishing periods are closed visible floats assist AWT in locating gear that should be removed from the water. There is also a safety concern when gear is not seen on the surface, as vessels could inadvertently strike a net that is sunk just below the waterline. Further, AWT recognizes the need to sink gillnets in areas of the state when debris in the water make it difficult to have a cork line on the surface. AWT supports the proposal as written, but when debris in the water is of concern additional floats marking midway on the gear is a supported alternative to ease in the identification of gear. 5AAC 39.250 pertains to commercial fishing only, if adopted for subsistence and personal use then AWT recommends similar language be added to 5AAC 01.220 and 5AAC 77.171.

Proposal 153: This proposal establishes escape mechanisms for collapsible ‘slinky’ groundfish pots.

AWT submitted and supports this proposal to establish escape mechanism requirements for this growing style of pot gear. Current regulations for escape mechanisms create confusion for both fisherman and enforcement on how a ‘slinky’ pot should be properly rigged. AWT in collaboration with ADF&G has drafted language that will meet the statutory requirements of AS 16.10.125 for ‘slinky’ pots.

AWT also suggested on the record in past board meetings to include a cleanup of the groundfish regulations pertaining to buoy marking requirements. The board modified the marking requirements for the Prince William Sound Area regarding longline pot gear. Buoy markings in the groundfish regulations are not consistent in the registration areas and can cause confusion. Having one statewide regulation for groundfish will reduce confusion on how gear is to be marked and prevent the burden to create or modify regulations in each registration area when gear types change.

Proposal 159: This proposal seeks to close commercial fishing for a given species within one-fourth of a mile of any area closed to sport fishing for that species.

AWT opposes this proposal as written due to the regulatory complexity it will cause for fisherman and enforcement. Both fisherman and enforcement would have to not only watch emergency order changes in the commercial fishery, but also that of the sport fishery, to determine whether commercial fishing can occur.

Proposal 167: This proposal seeks to require in season reporting of subsistence and personal use salmon harvest within five days of harvest.

AWT is neutral on this proposal but if passed there will be an additional burden placed on enforcement to ensure compliance. When permits, whether used or not, have a specific date in which they must be returned by it eases enforcement in that we only have to show it was not returned. To prove a violation of a person failing to return a permit within a set number of days from harvest, enforcement must not only show it was not returned, but also determine when harvest occurred to start the clock to know when it was required to be submitted by.