



THE STATE  
of **ALASKA**  
GOVERNOR SEAN PARNELL

**Department of Public Safety**

DIVISION OF ALASKA WILDLIFE TROOPERS  
Office of the Director

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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) have on the proposals that are up for consideration at the Upper Cook Inlet Finfish meeting in Anchorage.

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 or biological concerns, AWT is generally neutral in position.

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 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 are included in this letter.

Thank you for your time.

Sincerely,

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

Captain Burke Waldron  
B Detachment Commander  
Alaska Wildlife Troopers

**Proposal 122** - Though AWT recognizes the safety concerns addressed by this proposal if the Board chose to adopt this proposal the inconsistently scheduled fishing periods would be difficult for enforcement scheduling.

**Proposal 124** - Whenever possible, AWT supports the use of GPS coordinates to establish lines and boundaries for enforceability.

**Proposals 79, 131, 132** - Whenever possible, AWT supports the use of GPS coordinates to establish lines and boundaries for enforceability.

**Proposal 171** - Though this proposal is allocative in nature, if passed the inconsistently scheduled fishing periods would be difficult for enforcement scheduling.

**Proposals 47, 48, 49**, - If the board chooses to adopt these proposals, a clear difference between a “barbed” and a “barbless” hook will have to be defined to be enforceable.

**Proposals 50, 52** – These proposals would require anglers to commit other violations such as retaining snagged salmon. If adopted, a different regulatory scheme would need to be implemented to be enforceable.

**Proposal 53** – If adopted a definition for “head” would have to be added.

**Proposal 57** – If adopted as written the proposal is not enforceable.

**Proposals 184, 185** – Without an immediate, written record required enforcement of any reporting is problematic.

**Proposal 200** – If adopted, this proposal requires anglers to sometimes commit other violations such as retaining snagged king salmon.

**Proposal 201, 202, 203, 204, 205**, - Whenever possible, AWT supports the use of GPS coordinates to establish lines and boundaries for enforceability.

**Proposal 220** – As proposed this regulatory scheme would be confusing to the public and difficult to enforce. Further, whenever possible, AWT supports the use of GPS coordinates to establish lines and boundaries.

**Proposals 222, 223** – Gear and bait restrictions are difficult to enforce when limited by species, not body of water.

**Proposal 224** - If the board chooses to adopt this proposal, a clear difference between a “barbed” and a “barbless” hook will have to be defined to be enforceable.

**Proposals 229, 230, 232, 233, 234** - Whenever possible, AWT supports the use of GPS coordinate to establish lines and boundaries for enforceability.



**Proposal 241** – If passed, a 4:00 a.m. start/stop time for a fishery would put an additional burden for scheduling enforcement resources.

**Proposal 244** - Whenever possible, AWT supports the use of GPS coordinates to establish lines and boundaries for enforceability.

**Proposal 246** - If the board chooses to adopt this proposal, a clear difference between a “barbed” and a “barbless” hook will have to be defined to be enforceable.

**Proposal 249** - Gear and bait restrictions are difficult to enforce when limited by species, not body of water.

**Proposals 252, 253** - Whenever possible, AWT supports the use of GPS coordinate to establish lines and boundaries for enforceability.

**Proposal 259** – If adopted, in order to enforce a limited number of “starts” per week for guides, certain information would need to be recorded in the guide’s log book prior to departing on each trip. If not, if an operator is not “checked” during a trip, they could choose not to document that trip in the log book and it would not count towards their 10 starts for the week. Further, extending the fishing hours puts an additional burden on enforcement for scheduling purposes.

**Proposal 260** - If adopted, in order to enforce a limited number of days allowed fishing per week for guides, rather than limiting the days of the week for guides, certain information would need to be recorded in the guide’s log book prior to departing on each trip. If not, if an operator is not “checked” during a trip, they could choose not to document that trip in the log book and it would not count towards their 5 days for the week.

**Proposal 261** - If adopted, this proposal would lengthen the duration of enforcement contacts with guide boats on the water in order to determine and verify angler’s ages.

**Proposal 270** - If adopted, this proposal would clarify language that has caused difficulty for enforcement in the past.

**Proposal 273** - Statewide personal use fishing regulations dictate that only Alaska residents can participate. Requiring a personal use fisher to have a sportfish license in their possession is an easy way of verifying that the person is an Alaska resident, or at least reports to be. If adopted, this proposal would increase the difficulty to enforce residency requirements.

**Proposal 286** - If adopted, the term wake would need to be defined. Further, enforcing speed limits on waterways would increase the burden on enforcement and conventional speed measuring devices are not designed for marine applications.

**Proposal 316** - If adopted, an entire regulatory scheme would have to be developed to track the number of boats allowed on the river and which boats are responsible for going over the daily limit.

**Proposal 319, 322** - Whenever possible, AWT supports the use of GPS coordinate to establish lines and boundaries for enforceability.