



September 23, 2019

Chairman Morisky
Board of Fisheries

Comments from the Department of Public Safety, Division of the Alaska Wildlife Troopers (AWT), on the following agenda change requests (ACRs):

ACR #1

If adopted this ACR would significantly increase the fishing area available to commercial troll fishing for chum salmon during coho closures west and southwest of Crawfish Inlet. Waters included in the ACR are known to hold significant numbers of coho and chinook salmon. Opening this area would increase the need for enforcement of this fishery because of added boundary lines and potential for illegal retention of coho and chinook salmon. As it is, this fishery requires limited enforcement effort because the likelihood of coho and chinook by-catch is low and the area is relatively small. AWT does **not support** this ACR.

ACR #8

Current regulations allow two Bristol Bay drift gillnet CFEC permit holders to fish concurrently from the same vessel and jointly operate up to 200 fathoms of drift gillnet gear under most circumstances. There are three circumstances in which 200 fathoms is not allowed: 1) at any time in the Togiak District, 2) in special harvest areas and, 3) when the Naknek River Special Harvest Area (NRSHA) is open. When the NRSHA is open the maximum net length in all Bristol Bay Districts is reduced to 150 fathoms, regardless of the number of CFEC permits on board.

If this ACR is adopted the requirement to reduce net length on dual permit vessels when the NRSHA is open will be eliminated. This will simplify regulations and enforcement because net lengths will remain consistent throughout the season. At times, such as in 2019, NRSHA opened with relatively short notice which caused dual permit operations all over Bristol Bay, to scramble to adjust net length and then adjust back within a day or two after NRSHA closed and the regular District opened.

Adopting this ACR will align NRSHA with other special harvest areas in Bristol Bay, none of which have the net length reduction trigger. AWT **supports** this ACR.

ACR# 11

If adopted this ACR would add the use of one type of non-native earthworms, genus Lumbricus, as bait, to unlawful methods of taking fresh water fish. Enforcement of this regulation would be difficult. Wildlife Troopers are not currently trained in the identification of earthworms and it is likely that the sportfishing public is in the same boat. Prosecution of a violation of this section would be burdensome and would require the state to prove beyond a reasonable doubt that a particular worm is of the genus Lumbricus.

An education effort may be the best first step in curbing the use of Lumbricus as bait, AWT can play a role in the education effort without taking enforcement action.

Further, a law regulating the importation and possession of Lumbricus may be more effective in curbing infestation than a sport fish "methods and means" regulation. A law of this type may best reside in Title 3 Chapter 05 which is under the purview of the Commissioner of Natural Resources and Environmental Conservation. AWT does **not support** this ACR.