



THE STATE  
of **ALASKA**  
GOVERNOR MICHAEL J. DUNLEAVY

## Department of Public Safety

DIVISION OF ALASKA WILDLIFE TROOPERS  
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Board of Fish Members  
Alaska Board of Fish  
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Board of Fish Members:

The Alaska Wildlife Troopers (AWT) supports efforts by the Board of Fisheries (BOF) and fishery resource users to craft regulations that are clear, concise and enforceable. We appreciate the opportunity to advise the BOF on enforcement issues and offer the following comments on proposals to be reviewed at the upcoming Area M and Chignik meeting.

### **PROPOSAL 135**

South Unimak and Shumagin Islands June commercial salmon fishing schedule: This proposal, if accepted would increase the total number opening and closures from nine each to thirty each. Every commercial fishery opening and closure produces risk of violations, either intentional or unintentional. The number of set gillnet openings and closures would increase from 5 to 21 and the number of seine and drift gillnet openings and closures would increase from 4 to 9.

The increase in openings and closures would be an added burden to enforcement staff and would likely increase the number of violations and citations issued. This proposal would add significant complexity to the current fishing schedule.

AWT is **NEUTRAL** on the allocative aspects of this proposal but **OPPOSED** to tripling the number of openings and closures.

## **PROPOSAL 145**

Closed waters Northern District Salmon Fisheries Management Plan: AWT is **NEUTRAL** on the allocative aspects of this proposal. AWT strongly **SUPPORTS** changing the description of seaward boundaries of the Outer Port Heiden Section from what is commonly known as the 3-mile limit or 3-mile line, to boundaries defined by GPS coordinates.

For several reasons enforcing the 3-mile boundary line is problematic. Most commercial fishing boundaries in the state are defined by GPS coordinates and more are being changed to GPS coordinates each year. GPS technology has been vetted in the Alaska Court System, most commercial fishing vessels, other than set-net skiffs, have GPS on board and all Public Safety vessels and aircraft are equipped with GPS. Boundaries defined by GPS coordinates are user friendly for commercial fishermen, they promote orderly fisheries and reduce confusion as to the location of fishery boundaries.

## **PROPOSAL 155**

Gillnet specifications and operation for set gillnets in the Unimak Southwest, South Central and Southeastern Districts: Current regulations allow 25 fathoms of seine web to be used on the shoreward end of a set gillnet with a restriction that the shoreward end of the webbing must be attached to the beach above low tide. If passed this proposal would allow the seine web to be anchored behind a rock or a kelp patch. To be enforceable, the board will need to explicitly define the phrases “behind a rock” and “kelp patch.” Without clear definitions AWT is **OPPOSED** to this proposal.

Thank you for you for your consideration,

Captain Scott Quist  
Southern Region Commander &  
Board of Fish Liaison  
Alaska Wildlife Troopers