



THE STATE
of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Public Safety

DIVISION OF ALASKA WILDLIFE TROOPERS
Office of the Director

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Chairman John Wood
Alaska Board of Fish
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Chairman 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. 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. When the board considers proposals having to do with allocation or biological concerns, AWT is generally neutral in position and will not have a written comment.

Upon review of the proposals for the 2023 Lower Cook Inlet Finfish meeting, **Proposal 4** seeks to move the regulatory boundary in Cook Inlet for king salmon sport fisheries. AWT is neutral on the allocative aspects of this proposal, though has concerns regarding an additional boundary line that users will need to know if not change throughout all regulations it is referenced. Currently the latitude of 59°40.00'N is used in 5ACC 58.022, 5ACC 58.033, and 5ACC 58.055. Further Bluff Point is used in 5AAC 21.395. Though the proposal addresses changing 5ACC 58.055, if the board adopts the change, these other regulations should be considered also as it could cause confusion amongst anglers and enforcement. By adding additional lines fisherman are more likely to inadvertently violate other regulations. When creating new boundaries, using exact coordinates is preferred by enforcement, rather than geographical points.

Proposal 5 seeks to allow sport fishing from shore for all species in the Ninilchik area conservation zone closure area, except within 200 yards of the stream, from April 1 thru July 15. AWT is neutral on this proposal, but if passed this could result in additional complexity to the regulations for users to understand.

Proposal 22 seeks to close Cook Inlet waters north of Magnet Rock, to the harvest of rockfish from June 1 through July 31. AWT is neutral on the allocative aspect of this proposal, but if this proposal passed, it would create regulation complexity and potential confusion amongst users.

Proposal 39 would update Closed Waters 5 AAC 21.350 to include waters that were closed by markers but not covered in regulation. AWT supports this as GPS coordinates are preferred for enforcement purposes and makes it clear for fisherman.

Proposal 256 seeks to allow the use of bait, except roe, for fish species other than king salmon in the Togiak River drainage. AWT is generally neutral on regulations regarding the use of bait in sport fisheries, though this proposal raises enforcement concerns and creates complexity to the current regulations. When "bait" is not allowed, enforcement is generally easy as any substance, including fish eggs, used to attract fish by scent is unlawful. If regulations are passed to allow for certain types of baits to be used it increases the complexity of what currently is a simple definition. Further using undefined and unused terms like "roe" as an exempted bait type can and will cause confusion to users and enforcement. The current definition of "bait" is any substance applied to fishing gear for the purpose of attracting fish by scent, including fish eggs in any form, natural or preserved animal, fish, fish oil, shellfish, or insect parts, natural or processed vegetable matter, and natural or synthetic chemicals. This is intentionally written this way to cover any type of scent used to attract fish. If the board chooses to pass this regulation AWT suggests the board use the term "fish eggs in any form" rather than "roe" due to that term already being used in 5AAC 75.995(a)(36). Further AWT would suggest that to assist in enforcement and reduce regulatory confusion the board defines the terms used in 5AAC 75.995(a)(36), so that they can be individually included or excluded for proposals like this one, or future proposals that could be raised for other areas if this is passed. "Fish eggs in any form" being undefined could mean natural fish eggs that are cured or not cured, but would cause confusion on whether imitation fish eggs that are soaked in scent are legal or not. Currently if an angler uses unscented imitation fish eggs it would not be considered bait, and only becomes bait when scent is applied.

Thank you for your time,



Captain Derek DeGraaf
Alaska Wildlife Troopers