



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Public Safety

DIVISION OF ALASKA WILDLIFE TROOPERS
Office of the Director

5700 East Tudor Road
Anchorage, Alaska 99507-1225
Main: 907.269.5509
Fax: 907.269.5616

March 18, 2022

Chairwoman Carlson-Van Dort
Alaska Board of Fish
P.O. Box 115526
Juneau Ak, 99811-5526

Madam Chair and Board of Fish Members:

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 2022 Board of Fish meeting in Anchorage.

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.

Comments on specific proposals are included in this letter.

Thank you for your time,

Aaron Frenzel

Captain Aaron Frenzel
Alaska Wildlife Troopers

Proposal 234: This proposal seeks to require in season reporting of harvest and effort in the non-resident sport fishery.

AWT is neutral on this proposal but believes a change like this could create a substantial amount of work for Troopers. If passed it is likely to see a high number of violations amongst all age groups. AWT currently deals with many fail to report/return harvest information for both hunting and fishery permits annually. With the number of participants statewide in the non-resident sport fishery this could create a substantial amount of work for AWT to be enforced, and potentially reduce enforcement efforts in other areas.

Proposal 235 and 236: These proposals seek to amend the definition of “domicile” in 5AAC 39.975.

If the board has the authority to and seeks to amend the definition of “domicile” AWT would support that being considered at a Joint Board meeting and have it changed in both 5AAC 39.975 and 5AAC 92.990, then added to 5AAC 75.995 so that the definition is the same in all three areas. The definition of “domicile” should not be changed for commercial, sport, and subsistence fisherman then be different for hunters under 5AAC 92.990. Having different definitions between hunting and sport fishing could also lead to confusion when purchasing combination hunting and sport fishing licenses.

Proposal 241: This proposal seeks to define shrimp and to include that a shrimp is whole when referenced in bag limits.

AWT has been asked several if the bag and possession limit for shrimp means headed or de-headed shrimp. Since it is not clear we enforce it as de-headed when there are volume or weight limits in place as there is no regulation to prevent the de-heading while underway. AWT does not feel a definition of a shrimp is needed to clarify this, but rather it could be done within the regulations for the bag and possession limit by clarifying pounds or quarts of whole or de-headed shrimp if ADF&G feels it necessary for management purposes. In addition, if a limit is considered to be measured in whole shrimp, then an additional regulation should be considered to prevent a person from mutilating or otherwise disfiguring a shrimp.

Proposal 261: The proposal seeks to allow commercial Dungeness crab pots to be outfitted with pop-up on demand buoy release systems.

AWT opposes this proposal as it would be an additional burden for AWT to enforce pot limits and to ensure pots conform to regulations. In addition, it would make it very difficult to locate pots being fished prior to or after a fishery by both vessel and aircraft patrols. AWT has multiple vessels throughout the State used to inspect Dungeness crab gear and outfitting these vessels with the appropriate equipment would be costly.

Proposal 266 and 267: This proposal seeks to place commercial Dungeness crab pot limits in Area J, Kodiak and Southern Peninsula Districts, and place restrictions on operating Dungeness crab gear in the Kodiak District while participating in other commercial fisheries.

AWT is neutral on these proposals, but if a pot limit is put in place a pot tag requirement is necessary to be enforceable. If no pot tag requirement is in place it would be close to impossible for AWT to be able to confirm pot limits are not being exceeded.