



THE STATE  
*of* **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Department of Public Safety

DIVISION OF ALASKA WILDLIFE TROOPERS  
Office of the Director

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Chairwoman Carlson-Van Dort  
Alaska Board of Fish  
P.O. Box 115526  
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Madam Chair 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. 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.

The Bristol Bay region has three Wildlife Troopers assigned to it, two in King Salmon and one in Dillingham. On average during the commercial salmon fishery AWT supplements the region with an additional 12 Troopers and multiple non-commissioned employees, along with extra vessels and aircraft. AWT invests these assets to create a safe and orderly fishery. The extra resources that are brought to the region is at the cost to rest of the state as many offices are left shorthanded or vacant.

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 November 2022 Bristol Bay Finfish meeting in Anchorage.

Thank you for your time,

*Aaron Frenzel*

Captain Aaron Frenzel  
Alaska Wildlife Troopers

**Proposal 17:** This proposal would limit the number of anglers a company could have at a given time in a section of the Naknek River.

AWT opposes this proposal as a method to reduce the number of anglers on the river as it is easily circumvented. If additional restrictions are not made to limit the number of commercial operators allowed to be on the river, a business could create subsidiary companies and no reduction in anglers will be observed.

**Proposal 19:** This proposal seeks to prohibit the use of certain sport fishing tackle in a section of the Naknek River.

AWT is opposed to this proposal as defining “egg imitation” patters to meet the intent of the proposal will be very complex. This likely will create confusion among anglers and unintentional violations. If passed, to be enforceable several clear definitions of the terms used would need to be adopted.

**Proposal 24 & 25:** These proposals would reduce king salmon bag and possession limits and prohibit harvest of female king salmon in the Naknek River drainage.

AWT opposes these proposals regarding limiting king salmon retention to males only. Without additional regulatory changes it would be difficult to enforce. In game regulations when a bag limit is restricted to a single sex there must be evidence of sex left naturally attached to a part of the salvaged animal. For king salmon there are external features that tend to differentiate between a male and female, but those alone could be challenging to prove in court. The viscera of a salmon would be the most conclusive item used to confirm the sex of a salmon. If this proposal is passed AWT would recommend that king salmon retained may not have the viscera removed until processed for human consumption or preserved.

**Proposal 41:** This would increase the maximum distance from shore set gillnets are allowed to be set in some parts of the Nushagak District. It would also clarify the baseline from which the offshore distance is measured and establish a surveyed outer boundary line.

AWT is neutral on this proposal as it is written. Outer boundary limits require an increased amount of time to enforce when a specific distance is set from a stage of the tide. A surveyed plot line is beneficial to Troopers as it is much easier to enforce. These lines though are difficult to create throughout a fishery as beaches are rarely straight, thus creating an outer boundary line with multiple waypoints. If a surveyed plot line is created and adopted, AWT would recommend a limited number of waypoints along the line.

**Proposal 55:** This proposal seeks to change the definition of the Naknek Section and Kvichak Section to an intersection point of two lines, rather than the current GPS location.

AWT opposes having a boundary marker defined as a location where two lines intersect as it complicates enforcement efforts and could cause additional confusion on where that intersection is. To know where this intersection is enforcement and fisherman would have to operate two GPS units simultaneously, which for enforcement would require additional units placed in our vessels and aircraft. AWT has worked with ADF&G in the past to create a new waypoint that aligns the Naknek and Kvichak Sections corner along the Naknek-Kvichak District line and could not get it exact without added changes to regulation.

**Proposal 56:** This proposal would allow drift permit holders to conduct “test sets” in a designated area by notifying ADF&G.

AWT opposes this proposal as it will create an extra burden on enforcement resources that are already limited. This proposal, though not intended to be a “fishery”, would create another aspect of the fishery AWT would have to enforce regarding area boundaries, times, permits, notification requirements and tracking of fish.