



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. 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 Alaska Peninsula, Aleutian Islands and Chignik finfish meeting AWT will limit written comments specifically to proposal 98, which would modify waters closed to subsistence fishing for salmon to increase access for subsistence users who are not commercial salmon fishery permit holders.

During deliberations the board should consider that current regulation language discourages the unlawful sale and reporting of subsistence-taken fish as part of a commercial catch; current language connects the subsistence and commercial openings. As the proposal is written the permit holder themselves could not participate in a subsistence fishery in the areas described in 5AAC 09.350 during an open commercial salmon fishing period, but his vessel and crew could. If this proposal passes it will be more difficult for AWT to enforce commercial fishery closures because a commercial salmon permit holder with a crewmember that has a subsistence permit will have a defense for possessing fresh salmon. Subsistence-taken salmon must be marked, but the penalty for unmarked subsistence taken salmon is a maximum fine of \$100.00 unlike commercial fishing penalties that can be much higher and can include sanctions against a CFEC permit. If this proposal is passed AWT would suggest also limiting registered commercial salmon vessels and crewmembers associated with a commercial salmon fishery from subsistence fishing in these areas during a commercial salmon fishery.

Thank you for your time,

Aaron Frenzel

Captain Aaron Frenzel
Alaska Wildlife Troopers