



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

November 25, 2024

Madam Chair Merit Carlson-Van Dort  
Alaska Board of Fish  
P.O. Box 115526  
Juneau, AK 99811

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. 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 2024 Cordova meeting AWT provides the following comments for consideration:

**Proposal 1** seeks to establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.

AWT is neutral to the methods and means, however, would recommend that the regulation mirrors Southeast Alaska sablefish regulations for personal use (5AAC 01.720(5)) and subsistence (5AAC 77.674(6)(E)) for consistency. Regarding sport fishing for sablefish with pot gear, AWT is neutral, but believes this would be the first sport fishery for sablefish with pot gear and regulations would need to be drafted appropriately. If the board does support making pot gear as a sport fish method for sablefish, a review of 5AAC 75.057 should be completed and determine if a similar regulation should be placed on sablefish. This regulation prevents the soaking of pots for shellfish by charter operators for new clients to pull on a regular basis.

**Proposal 4** seeks to restrict gear in PWS for rockfish by limiting “auto-bait” equipment.

AWT is neutral to this proposal, however, if the board chooses to pass a regulation to prohibit a piece of equipment which is not defined, AWT suggests creating a definition of what it is. Defining an auto baiter will reduce confusion amongst users and enforcement as adaptations to the fishery occur into the future.

**Proposal 10** seeks to modify pot limits in PWS for the cod fishery.

AWT is neutral in regard to pot limits, but would recommend rather than limiting the number of pots by weight as proposed, the regulation should limit the number of slinky pots and all other pots. Due to the growing popularity of slinky pots the board should also consider creating a definition for this type of gear. If the regulation is passed as written, AWT would be required to purchase certified scales for enforcement purposes and for enforceability AWT would need to know in regulation what all is included when determining the weight of a pot. For example, is the pot to be weighed with all bait containers, lines, and other attachments removed, is it to be weighed wet or dry, etc.? Additionally, the proposal as written uses the wording “60 groundfish pots heavier than 30lbs or 120 groundfish pots lighter than 30 lbs.”, meaning that a person may not use a mixed style of pots, and that the total number of pots are not the aggregate of both styles. AWT supports using the word “or” as enforcement becomes complicated if a fisherman were able to use mixed styles of pots in a fishery with pot limits. Similar language is used in the SE Shrimp fishery when pot limits are based on pot size.

**Proposal 14** seeks to change the PWS Pollock Pelagic Trawl Fishery by prohibiting Pelagic trawl gear from seafloor contact and prohibiting the bycatch of Chinook salmon.

AWT is neutral on both requests in this proposal, however per the definition of a “pelagic trawl” in 5AAC 39.105(d)(10)(C) contact with the seabed is currently prohibited.

**Proposal 23** seeks to allow the operator of a vessel who retains sablefish in federal waters to operate gear in the state waters of the PWS Area during the same trip, but not retain sablefish.

AWT is neutral to the allocation, however, has enforcement concerns. This will provide an opportunity to have sablefish on board from outside waters, and gear fishing inside waters capable of catching sablefish. This change, if passed, would also make PWS area regulations different from the neighboring Cook Inlet regulations. This would be difficult enforce, especially vessels that fish IFQ sablefish and halibut during the same trip.

**Proposal 28** seeks to modify the rockfish bag and possession limits in PWS Area.

AWT is neutral to the allocative aspect of this proposal, but due to the complexity of the regulation oppose the change. AWT supports aligning bag and possession limits so that fisherman do not begin fishing one area with a higher bag or possession limit, then move into another area to fish and unintentionally be over the limit for the waters they are now fishing per 5AAC 75.010. In areas of the state that users transition between management areas during a trip, AWT supports aligning limits.

**Proposal 30** seeks to increase subsistence tanner crab pot limits in PWS.

AWT is neutral to the allocation, however it will be more difficult to enforce different pot limits within relatively small boundaries. Pot limits should align throughout the area to reduce confusion and the potential to unintentionally operate extra gear.

**Proposal 43** seeks to establish an Octopus fishery in PWS.

AWT is neutral to the allocation. If passed, board should define what an octopus pots is, if there will be a pot limit, along with any identification tag, marking and escape mechanism requirements.

**Proposal 46, 47, & 65** seeks to require harvest reporting within 5 (or) 7 days of harvest on the Copper River.

AWT is neutral on these proposals 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 user and age groups. AWT currently deals with many “fail to report/return” harvest information for both hunting and fishery permits annually. In most of these there is a one-time reporting for all activity, whereas this proposal would require multiple in season reports to be made within five or seven days of harvest by an individual. Multiple trips or harvest would create multiple reporting windows. To enforce this AWT has confirm that a harvest occurred, and that reporting did not occur within the required number of days which would create a large amount of work for AWT to be enforced, and potentially reduce enforcement efforts in other areas.

**Proposal 49** seeks to prohibit transport services in the Glennallen Subdistrict.

AWT remains neutral on these types of proposals, but still believe if regulations are put in place they should be done statewide, and the terms used should be clearly defined. The commercialization of guiding and transporting activities in subsistence and personal use fisheries has been growing in popularity for many years and is not regulated under 5AAC 01, 02 or 77. Defining the terms of subsistence guide, subsistence transporter, client and compensation, similarly to what is in 5AAC 75 for sport fish would ensure that enforcement can properly regulate these activities.

**Proposal 50** seeks to prohibit the use of chart plotters or fish finders in the Chitina and Glennallen Subdistricts.

AWT opposes this regulation as these units can be used for navigational purposes. Many of these units are built into a multipurpose chart plotter and depth sounder device. Making vessel operators remove these to operate in the fishery could lead to safety concerns relating to vessel operations.

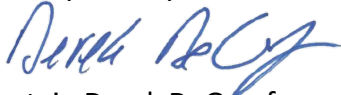
**Proposal 83** seeks to allow a resident sport angler to use two rods when fishing for salmon.

AWT is neutral to the method, however, similarly this is only allowed in SE per 5AAC 47.055 for residents from Oct 1 through March 31 while targeting king salmon and may only retain salmon. During this period in SE winter kings are primarily targeted, all other species must be released. When open year-round, many other non-target species are potentially harvested, which could make this difficult to enforce.

**Proposal 85** seeks to increase the possession limit for coho salmon in the PWS Area.

AWT is neutral to the allocative aspect of this proposal, but due to the complexity of the regulation oppose the change. AWT supports aligning bag and possession limits so that fisherman do not begin fishing one area with a higher bag or possession limit, then move into another area to fish and unintentionally possess an over limit for the waters they are now fishing per 5AAC 75.010. In areas of the state that users transition between management areas during a trip, AWT supports aligning bag limits.

Thank you for your time,



Captain Derek DeGraaf  
Alaska Wildlife Troopers