



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Public Safety

DIVISION OF ALASKA WILDLIFE TROOPERS
Office of the Director

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Chairman Jensen
Alaska Board of Fish
P.O. Box 115526
Juneau Ak, 99811-5526

Dear Chairman Jensen:

The following comments give a brief description of the positions that the Department of Public Safety, Division of Alaska Wildlife Troopers have on some of the proposals that are up for consideration at the March 2018 regulations meeting in Anchorage.

In general, when the board considers changes, especially when those changes involve seasons, bag limits and areas, the Alaska Wildlife Troopers (AWT) request that every effort possible be made to align the season dates and bag limits with adjacent districts and sections. This is mainly for the benefit of the public but also helps greatly with enforceability of regulations over wide areas. When the board considers proposals having to do with allocation or biological concerns, AWT is generally neutral in position.

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. We ask that the board recognize that the division has limited resources and man power and any new regulation scheme or area restrictions may place an additional burden on AWT.

Comments on specific proposals follow on the next page.

PROPOSAL 208

If passed this proposal would establish pot limits for the Alaska Peninsula District commercial Dungeness crab fishery based on vessel length or history of participation as follows; vessels ≤ 40 feet in length would be limited to 50 pots, vessels 41–50 feet in length would be limited to 75 pots, vessels >50 feet in length would be limited to 100 pots, or vessels with 5 or more consecutive years of participation in the fishery would be limited to 100 pots regardless of vessel length.

This proposal would add regulatory complexity and increase workload on enforcement assets. Currently the regulation is simple, it says, “**5AAC 32.425 Lawful gear for Registration Area J.** Dungeness crab may be taken only with Dungeness crab pots or ring nets.”

To be enforceable, the regulation would likely require the implementation of pot tags and logbook requirements like other fisheries in the state. Also, by tying pot limits to vessel length it would require AWT to measure vessels, closely inspect gear for pot tags and inspect log books. The result will be increase scrutiny on the fishery and in all likelihood the number of citations written to participants will increase.

If pot limit and pot tag regulations are implemented a benefit could be that the number of derelict pots in the water would go down and the operators of derelict pots may be more easily identified.

PROPOSAL 209

If enacted the regulation would require vessel operators participating in Registration Area J commercial Dungeness crab fisheries to lift their pots at least once every 14 days. The new requirement could reduce commercial fishing during closed periods and pot loss. Derelict pots and commercial fishing during closed seasons are ongoing issues with the Dungeness crab fishery in Registration Area J. Following the closure of the 2017 season, AWT removed 170 derelict commercial Dungeness crab pots from the waters of Kodiak District in a one-week period.

Enforcement of the regulation however would be difficult, to be enforceable the regulation would have to include pot tag and log book requirements. These requirements would add regulatory complexity but could reduce the number of derelict pots and would increase accountability.

PROPOSAL 230

This proposal would open drift gillnet fishing for subsistence in Sub-districts 4-B and 4-C, AWT is neutral on the allocative aspects of this proposal. Implementing this proposal will align state and federal subsistence regulations; currently drift gillnet fishing is allowed in waters adjacent to federal lands in 4-B and 4-C by federally qualified subsistence user, but drift gillnets are not allowed in state waters. Because there are both state and federal waters in the area implementing this proposal would eliminate a boundary line for fishers that qualify for both federal and state seasons. Most subsistence fishermen that use the area are federally qualified subsistence users. AWT supports continuity between state and federal regulations when possible.

Thank you for you for your consideration,

Captain Scott Quist
Southern Region Commander &
Board of Fish Liaison
Alaska Wildlife Troopers