



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Public Safety

DIVISION OF ALASKA WILDLIFE TROOPERS
Office of the Director

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Madam Chair Marit Carlson-Van Dort
Alaska Board of Fish
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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. 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 2026 Statewide Finfish meeting AWT provides the following comments for consideration:

Proposal 162 seeks to prohibit subsistence fishing transportation services during any part of a subsistence fishing trip.

AWT is neutral to the allocation. This proposal is enforceable. However, AWT would expect to receive many reports that someone was "dropped off by a boat and therefore they have to be illegally transported." This could divert AWT from other on-going patrols, and could require us to hook up a boat, trailer it, launch it, run the river to contact them, maybe only to find out they were dropped off by a friend. Being a statewide regulation, this will prohibit all subsistence finfish fishing from vessels where the operator is being compensated.

Proposal 166 seeks to amend the statewide definition of a mechanical jigging machine.

AWT is neutral to this proposal, but if proposal 167 or 168 is passed, the board should consider clarifying the definition of mechanical jigging machine. AWT agrees this would be enforceable and would reduce the use of a long line reel being used for jigging.

Proposal 167 and 168 seek to prevent vessels participating in a groundfish fishery with jigging machine or hand troll gear, from having other groundfish gear on board at the same time.

AWT supports these proposals if the board agrees with the proposer's concerns. In Kodiak, AWT has fielded quite a few after-the-fact reports of suspected vessels fishing long line gear and/or slinky pots while jigging. AWT has not made these observations (snap hooks in mouths of fish being delivered under a jig permit) as being reported to us, but think the concerns are valid. Based upon reports to AWT, it appears this activity is likely to occur at night. As written, AWT could enforce the slinky pot, reels and drums prohibition, however "long line" gear would need further clarification, such as stating how much ground line could be on board, and how many anchors and buoys are on board. As defined in 5AAC 39.105(d)(25) a long line drum/reel meets the definition of a mechanical jigging machine. If passed, proposal 166 should be considered to prohibit long line reels from being on the vessel. Currently, due to these concerns in the past, a 500-hook aggregate limit was placed on the fishery. But if someone wanted to stash another 1,000 hooks in a couple of totes during daytime hours when we conduct our boardings, it would be easy to do.

Proposal 169 seeks to create a definition of a slinky pot.

AWT supports this proposal and thinks it would add clarity and understanding to resource users and enforcement for this newer type of pot now being used throughout Alaska.

Proposal 174 seeks to allow the engine of a purse seine vessel or skiff to be shut off when the purse seine is deployed.

AWT opposes this proposal. 5AAC 39.260(i) was created many years ago after observing commercial seiners setting seines as fish traps. AWT has received reports of "creek robbing" where anchoring the net was likely involved. A search for citations issued for this over the past ten years revealed two citations. We should consider that one of the reasons for the small number of violations is that the current regulation is accomplishing its aim of preventing larger violations, through the closure of a loophole.

Proposal 175 seeks to modify dipnet mesh size and configuration, specifically to reduce mesh size to 3.5 inches, and to prohibit users from adding on a rope attached to the handle to extend the reach of the net into the water.

AWT is neutral on this proposal but has concerns with enforcement with how it is written. During the 2023 Arctic, Yukon, Kuskokwim Finfish meeting proposal 89 was submitted to allow for ropes to be used in conjunction with dipnets know in the region as the "Yukon Method". Due to the current definition of a dipnet the method of attaching a rope was already lawful if the net was operated by hand. The definition does not say the handle must be in the operator's hand; it only states the frame must be attached to a single rigid handle and must be operated by hand. The net may not have more than one rigid handle but does not exclude lines attached to the net being

used. The “Yukon Method” involved a very short handle attached to a length of rope that is deployed and then retrieved by hand.

If the intent of the regulation is that the single rigid handle must be in hand during operation, then AWT suggest language that states, “the frame must be attached to a single rigid handle which is held in the hand during operation.” Additionally, the board must recognize that there are no restrictions to handle length, if the intent is to prevent nets from being lower in the water column due to long handles with ropes attached, then a handle length limit should be considered as well.

Proposals 176 and 177 seek to allow anglers fishing from the same vessel to pool bag and possession limits.

AWT opposes both proposals as it can create issues with enforcement. Throughout both hunting and fishing in Alaska, outside of subsistence and personal use household permits, bag and possession limits are set to a person, not a group to allow “party hunting/fishing.” Creating a “boat limit” can lead to issues when dealing with enforcement of king salmon stamps, sport fishing licenses, angler limits of a non-resident to a resident, recording of species with annual limits, and size limits. Additionally, there is no age limit of when a person is authorized a bag limit of their own, currently AWT enforces this by stating the child must be able to operate the fishing gear; a child can hold the rod and reel in the fish with minimal assistance and originally hooked it. If passed as written an adult on the vessel would be able to catch and retain bag limits for all people on board (including infants), no matter what their age is.

Proposal 178 seeks to modify the definition of a bag limit and adds “any person taking part in the catch.”

AWT opposes this proposal as it can create ambiguity and enforcement challenges. AWT has not had any enforcement concerns with a guide, friend, or family member removing a rod from a rod holder and handing it to a youth or disabled fisherman. By allowing the fish to be counted towards the bag limit of “any person taking part in the catch” it creates the same enforcement concerns that AWT commented on in proposal 176 & 177. Additionally, it is unknown and ambiguous on what “taking part in the catch” means. Is a person driving the boat that never come out on deck “part of the catch?” Without a clear definition of this enforcement will be challenging.

Thank you for your time,



Captain Derek DeGraaf
Alaska Wildlife Troopers