



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  
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. 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 Bristol Bay meeting AWT provides the following comments for consideration:

**Proposal 53** seeks to close a portion of the Egegik District to mitigate illegal fishing late season.

AWT is neutral on this proposal but does not think the proposal will reduce what is already occurring in this area during late season.

**Prop 56** seeks to sunset the date and permanently adopt the current defined offshore locations in the Nushagak District set gillnet fishery.

AWT supports this proposal. Having a very specific, fixed, and easily identifiable GPS line is a good thing for fisherman and enforcement. The old regulation defined the maximum offshore distance by a measurement in feet offshore of the mean high tide mark. The mean high tide mark is a moving target that is difficult, if not impossible, to specifically identify without charts and surveys.

**Prop 57** seeks to adopt offshore locations used in the Nushagak District set gillnet fishery for the drift gillnet fishery and prohibit drift gillnet gear from coming into contact with set gillnet gear.

AWT supports proposals that reduce conflict between gear types. The addition to (n) prevents drift gillnet vessels from operating gear inside of the line described in (n) (1-4). Additionally, this Bristol Bay wide proposal would prevent vessels from contacting set net gear. 5aac 06.335 already prohibits drift gillnet gear from coming into contact with set gillnet gear. AWT has taken many calls over the years about set net gear being damaged by drifters. The most common scenario is a drifter attempts to fish close to, or in-between, set nets and then gets pushed into the set net by the tide, wind, or a combination of both. Once the nets become entangled and the drift boat attempts to tow its net free buoys can be torn off, anchors pulled up, and nets may be torn or intentionally cut loose. Further, AWT has received more complaints recently on jet boats traveling over set nets causing damage. If passed, (w) would reduce complaints from set gillnetters about gear being damaged by vessels driving over set gillnets.

**Prop 80** seeks to allow joint venture set gillnet fishing operations in Bristol Bay.

AWT is neutral to this proposal. Currently, a crew member cannot transport or sell the fish of the permit holder unless the permit holder is present (AS 16.05.680(B)). AWT often sees violations where crew members forge the signature of the permit holder (who is not present) or multiple permit holders will co-mingle fish to be delivered on one fish ticket. We see nothing in the proposal that eliminates the need for both permit holders to be present and participate in operation of the joint gear. Additionally, there is nothing that eliminates the requirement for both permit holders to be physically present at the time of delivery so both can sign the joint venture fish ticket.

**Proposal 82, 83, 84, 85, 86, 87, 88, 89, 90, and 91** seeks to amend the existing 32" vessel specifications regulation to varying degrees.

Over the past several years, AWT spent considerable time looking at vessels and working with multiple industry groups and fishermen regarding enforcement, along with a potential change in the regulations if it were brought in front of the Board of Fish. After discussing with the Alaska Department of Fish and Game and the Department of Law, AWT mailed a letter to Bristol Bay permit holders in February 2023 regarding vessel modifications and items not permitted beyond the 32-foot overall length. Permit holders were notified that during the 2023 season, AWT would place more focus on enforcing the vessel length regulation, with the intent to provide time to bring their boats into compliance if needed before the season. After sending this letter, vessel owners began providing photos or requested AWT to look at their vessels to give insight into legality. Some owners underwent extensive changes to make their vessels within regulation. Very few argued and disagreed with AWT's direction in the letter. Multiple owners called and voiced support for our enforcement efforts and stance since these modifications had expanded beyond the 32-foot length for years. Pre-season discussions took up countless hours of our trooper's time, and many ended with disagreements in opinions, some to the point where marine architects and attorneys were involved. Differences in opinions primarily stemmed from jet mounting boxes and outdrive guards that provide additional planning surfaces. The long list of

exceptions that allow for items to be beyond the 32-foot overall length is the primary reason we are in this position when trying to enforce this complicated regulation. Having exceptions allows for different interpretations of the definition of an allowable item, thus creating confusion and arguments. AWT believes having a maximum overall length with no exceptions is the simplest to interpret and straightforward to enforce. AWT should be able to drop a plumb line off the furthest extremities on the bow and stern and easily measure between those lines to determine the overall length. Having a maximum distance from the most forward extremity to the aft extremity eliminates all confusion on what is allowed. AWT does not have an opinion on the length; however, the regulation should be precise and eliminate confusion.

**Proposal 102** seeks to increase the area open to sport fishing for King Salmon to bait five days earlier and add an additional six river miles to the section of the Togiak River open to King fishing.

AWT is neutral to this proposal. The current King closure line at Gechiak Creek does leave room for interpretation since the Togiak River is split into two main channels at that point. This could be resolved by creating GPS points on the east and west banks of the Togiak River at Gechiak Creek that create a closure line. The proposer asks, if an angler catches a King while fishing for rainbows, is that illegal? The answer is no that is NOT illegal, but the King salmon may not be removed from the water and must be immediately released. Also, there is no doubt that using bait while King Salmon are in the river will also create ambiguity for enforcement and make intent hard to judge.

Thank you for your time,



Captain Derek DeGraaf  
Alaska Wildlife Troopers