



Memorandum

To: Board of Fish

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From: Captain Derek DeGraaf *DDG*
Alaska Wildlife Troopers, Southern Detachment Commander

Date: September 28, 2023

Subject: AWT October Working ACR Group Comments

AWT Comments: Area M

During the 2023 Alaska Peninsula Finfish meeting, AWT heard concerns about vessels discarding salmon in the Area M fishery. AWT listened to these concerns and planned several enhanced commercial fishing patrols for the June fishery. Though closed waters, area, and period violations are routinely a focus, we prioritized the concerns that were raised to us and the Board of Fish regarding the discarding of salmon.

Area M is unique in that the fishery covers a large area, and vessels are not competing in close proximity to each other as they are in other fisheries. Routine patrols by skiff make it challenging to enforce violations of discarding of salmon cases due to how spread-out vessels and AWT cannot go unnoticed.

To enhance our capabilities in determining if discarding of salmon was occurring in the Area M fishery, increased patrols were conducted on the P/V Cama'i and the P/V Stimson, along with the use of state aircraft. Due to these efforts, over 100 commercial vessels were boarded, approximately 300 commercial fishermen were contacted, and 21 citations were issued. Of these citations, nine were issued to captains and crew members who were observed discarding commercially caught salmon from their vessels after the fish were brought on board.

Violations of the discarding of salmon were documented on seine, drift gillnet, and setnet vessels. These cases are still in the judicial process, which prevents AWT from further expanding on specific details. -[Press release](#)

Stats:

1. Days at sea in the area: 15 total (4 Stimson and 11 Cama'i)
2. Types of citations: 21 total citations - Besides the discarding of salmon, cases included: No commercial crew license, Employ Unlicensed Crew, No CFEC License, Improperly Marked Gear, and Vessel Identification.

AWT Comments: 32' Bristol Bay boat length

During the 2022 Bristol Bay Finfish meeting, AWT announced to fisherman that an increase in complaints had been received regarding vessel length issues in the Bristol Bay fishery.

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, which was not done before the 2023 season. After discussing with the Alaska Department of Fish and Game and the Department of Law, AWT mailed the [attached 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 vehemently 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 regulation and keep everyone on an equal playing field.

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. 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. We believe for the most part the fleet made an effort to correct vessels that were beyond what the regulation allows. Overall, AWT Troopers investigated two vessels that were reported to be overlength. In both cases, AWT measured the vessels and issued warnings to the owners with directions on how to correct the overlength portions of their vessels.

James E. Cockrell
Commissioner

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STATE OF ALASKA



Department of
Public Safety

Anchorage, Alaska

PRESS RELEASE

Wildlife Troopers Deploy Significant Resources for Annual Bristol Bay and Area M Fishery

August 10, 2023 (ANCHORAGE, AK) – The Alaska Wildlife Troopers have completed their special enforcement operation for the annual Bristol Bay and Area M commercial fishery in Southwest Alaska. The annual Bristol Bay Sockeye Salmon fishery is the largest Sockeye fishery in the World, producing around 46% of the global wild Sockeye harvest. The fishery is valued at over \$1.5 billion and provides thousands of direct and indirect jobs.



An Alaska Wildlife Trooper boards a commercial fishing vessel in Bristol Bay from an AWT patrol skiff.

Each year roughly one-quarter of the State's Wildlife Troopers deploy to the five fishery districts that make up the Bristol Bay fishery to enforce the regulations set by the Alaska Board of Fish and Alaska Department of Fish and Game. During the 35-day special enforcement operation, Troopers patrolled Bristol Bay using several fixed-wing aircraft, a helicopter, multiple patrol boats, a medium-class patrol vessel, and the State's largest patrol vessel, the P/V Stimson. Thousands of commercial fishermen were contacted during the operation, and over 400 commercial vessels were boarded. Wildlife Troopers issued 150 citations to vessel captains and crew members and seized thousands of pounds of salmon.

"The Alaska Wildlife Troopers' mission is to protect Alaska's vast fish and game resources across the state and ensure that the commercial, sport, subsistence, and personal use fishermen are following the rules and operating safely," stated **Colonel Bernard Chastain, Director of the Alaska Wildlife Troopers**. "We appreciate that the vast majority of users are following the regulations and know that those that violate these rules will be held accountable for their actions."

Along with the Bristol Bay enforcement program, Alaska Wildlife Troopers enhanced patrol efforts on the Alaska Peninsula and Unimak Island commercial salmon fishery known as Area M. Due to these efforts, over 100 commercial vessels were boarded, approximately 300 commercial fishermen were contacted, and 21 citations were issued. Of these citations, nine were issued to captains and crew members who were observed discarding commercially caught salmon from their vessels after the fish were brought on board.

Overall, the Alaska Wildlife Troopers conducted approximately 2500 vessel hours, 9,000 personnel hours, and 300 flight hours during these two fisheries.

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February 14, 2023

Bristol Bay Commercial Salmon Drift Gillnet Permit Holders,

The Alaska Wildlife Troopers are aware of the increasing concern fishermen have regarding drift gillnet vessel lengths in the Bristol Bay Salmon Fishery. AWT has inspected multiple vessels post-season and have noted several areas of concern regarding overall length in the fleet.

The Bristol Bay vessel specifications are described in 5AAC 06.341. The regulation limits drift gillnet vessels to 32 feet in overall length, with a few exceptions. One exception is an anchor roller may extend no more than eight inches beyond the 32-foot overall length and may not be more than eight inches in width or height. The regulation defines "overall length" as the straight-line measurement between the extremities of the vessel, but does not include fish drop-out baskets, anchor rollers, gillnet rollers, trim tabs, outdrives or outdrive guards.

5AAC 06.341 (b) defines each of the items that are not included in the 32-foot measurement:

- "Anchor Roller" means a device used solely in the aid of deploying and retrieving anchor gear, and does not provide any additional flotation, planing surface, or structural support to the vessel.
- "Fish Drop-Out Basket" means a device used solely to prevent the loss of fish from a gillnet after the fish leaves the water and before it is brought on board the vessel; a "fish drop-out basket" does not provide any additional flotation, planing surface, or structural support to the vessel.
- "Gillnet Roller" means a device used solely in aid of deploying and retrieving drift gillnet gear; a "gillnet roller" does not provide any additional flotation or planing surface to the vessel.
- "Outdrive" means part of the propulsion system of a vessel used for either steering or thrust; an "outdrive" does not provide any additional flotation or planing surface to the vessel.
- "Outdrive Guard" means a device of skeletal construction used solely to protect the outdrive unit of a vessel; an "outdrive guard" does not provide any additional flotation or planing surface and is not used for any other purpose such as a bench, platform, or storage area.
- "Trim Tabs" means an extension of the bottom of a vessel, at the transom, which is no more than 18 inches long at its longest point; "trim tabs" do not provide any increased flotation, and their sole function is to provide trim to a vessel while underway.

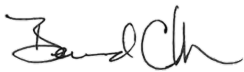
Though many vessels are 32 feet in overall length, AWT has noted multiple items that have been modified, added to, or repositioned on vessels that extend beyond 32 feet and are not allowed by regulation. Examples of possible illegal modifications include, but not limited to:

- Anchor rollers that are longer than the allowed eight inches extending beyond the 32-foot length or are taller and wider than the allowed eight inches.
- Fish drop-out baskets that have been modified significantly. A fish drop-out basket may not provide flotation. Baskets that are built out of large diameter sealed aluminum tubing, which provides flotation when submerged under heavy loads is prohibited. A fish drop-out basket may not provide flotation.
- Gillnet Rollers structures or mounts that extend beyond the 32-foot length. Although gillnet rollers may extend beyond 32 feet, extensions of the transom beyond 32 feet overall length are not allowed. Vessels that have extended their deck working space by building mounting structures off the stern of the vessel and moving the gillnet roller further back are prohibited.
- Outdrive mounts that extend beyond the 32-foot length. Traditionally jet outdrives were bolted directly to the stern. Extension of the hull beyond 32 feet to mount the outdrive is not allowed under regulation.
- Outdrive guards that have been built with large diameter sealed aluminum tubing. If such tubing traps air which provides flotation when submerged it is prohibited under the regulations. Some vessels have guards with aluminum decks added to them to provide a platform or bench. If the vessel has an outdrive guard below the jet unit, it may not provide a planing surface and must be of skeletal construction.
- Trim tabs have been modified and act as extension of the hull if they provide additional flotation are prohibited. Trim tabs have been seen that extend more than the maximum 18-inches beyond the 32-foot overall length. The “trim tab” can be included below the jet unit but may not be more than 18-inches long beyond the 32-foot overall length.
- Miscellaneous items like refrigerated seawater systems, washdown systems, transducers, exhaust, ladders, platforms, and other items have been located aft of the transom are not authorized to be beyond the 32-foot overall length.

The Alaska Wildlife Troopers understand that some adaptations in equipment have occurred over the years to promote product quality and overall safety within the fleet. However, other modifications have been made for operational performance. The current regulations set in place by the Alaska Board of Fisheries provide a fair and equitable playing field for all permit holders. Any adaptation to vessels beyond what is currently allowed needs to be proposed to the Board of Fisheries through the proposal process and amended in regulation prior to implementation.

In an effort to ensure a fair and equitable fishery, AWT will be measuring vessels for possible enforcement action during the 2023 fishing season. If you have questions on your vessel you are encouraged to call the Alaska Wildlife Trooper Post in King Salmon at 907-246-3307, Dillingham at 907-842-5351, Kodiak at 907-486-4762 or Captain Aaron Frenzel at 907-334-2501.

Sincerely,



Colonel Bernard Chastain
Director, Alaska Wildlife Troopers