



July 31, 2009

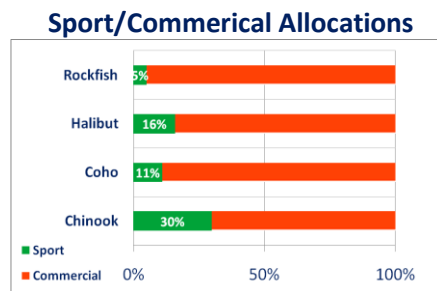
Mr Charles O. Swanton  
Director, Division of Sport Fish  
Alaska Department of Fish and Game  
via email to: [dfg.dsf.strategicplan@alaska.gov](mailto:dfg.dsf.strategicplan@alaska.gov)

**Re: ADF&G Strategic Plan Response**

Dear Mr Swanton,

The Southeast Alaska Guides Organization, SEAGO, represents Southeast Alaska charter fishing and lodge operators and their clients. Our mission is to promote the tradition of sport fishing in Southeast Alaska through reasonable regulations that ensure the long-term sustainability of our businesses and fish resources. SEAGO considers conservation and sustainability of the resource the overriding concern in all fisheries issues.

Sport fishing in Alaska has grown to become the 4<sup>th</sup> largest segment the State's GDP, generating \$1.4B in economic activity and serving 500,000 residents and visitors each year. As such, it deserves equal standing in the State's fisheries management plans; it's time to move beyond historical precedents, policies, and practices. For too long, sport fishing interests have been held hostage to regulations, legislation, and appointments designed largely to protect commercial fishers without consideration to the economic health of communities that depend on a well diversified use of our resources.



More than 90% of the fish taken in Alaska go to the commercial industry. Even in the best case, sport fishermen receive only three in ten fish.

Sport fishing in Alaska is under attack. If some had their way, they would shut us down completely. In order to ensure sport fishing's ongoing viability, ADF&G needs to

step up efforts to ensure fair & equitable access and maintain sustainability of the fishery resource. We need to move away from the "us-versus-them" mindset and instead, focus on the needs of local economies and the best use of our fisheries resource. In the long run, this approach will best serve the State.



We understand that ADF&G is not responsible for allocation decisions, however it is responsible for managing our fisheries in the best interests of the economy and the well being of the people of the State. We call on the Department to actively promote each of the ADF&G mission's three key elements in support of sport fishing interests:

1. Best interest of the economy
2. Well being of the people
3. Consistent with the sustained yield principle

ADF&G Mission Statement  
*To protect, maintain, and improve the fish, game, and aquatic plant resources of the state, and manage their use and development in the best interest of the economy and the well-being of the people of the state, consistent with the sustained yield principle.*

Highlighted below are several initiatives which we believe are important to support the health of sport fishing in the state. We present our recommendations in accordance with the Department's draft goals.

**Goal 1: Fisheries Management - Ensure the sustained use of Alaska's recreational fisheries while optimizing economic and social benefits.**

1. Require a rigorous financial/economic analysis/impact (on par with current sound biological/scientific analyses) for all fishing regulation/allocation proposals considered by either ADF&G and/or BOF. Fund staffing within the Department to complete these analyses. This should be required in order to meet the ADF&G mission of "... best interest of the economy".
2. Ensure that there are no in-season sport-fishing closures, except when a true conservation concern exists (subject only to emergency order).
3. Publish sport fish regulations for the upcoming year no later than November of the preceding year whenever possible.
4. Support a viable and fair sportfishing guide bill.
5. Introduce regulations to reduce/eliminate wasteful by-catch for commercial gear types/methods (in particular trawlers, long-liners) that catch sport fish either as a targeted fishery or as by-catch.
6. Prioritize sport fishing over commercial for specific species, ie king, silver, and sockeye salmon, halibut, rockfish, and lingcod where marginal shifts in allocation would result in large economic gains for Alaska's coastal communities. Use economic value to establish new allocations/access to each species.
7. Promote sport fishing related education and tourism in Alaska through development and execution of marketing/promotional activities. Educate State leaders, community officials, and the public on the benefits of sport fishing to the State. Coordinate efforts with ancillary organizations within the State, Dept of Tourism, etc. Solicit federal and state government grants to promote sport fishing education and tourism in the State.
8. Expand fisheries management models to integrate "optimum yield" strategies in addition to sustainable yield principles. Sustainable yield speaks to the biological restraints – catch as many as possible without harming the resource. Optimum yield considers maximum



economic value. For instance, if we cut the halibut harvest in half, eliminated the commercial fishery, and opened southeast to a wide-scale promotion of destination sportfishing, would that result in greater economic value than the current commercially dominated sustained yield model?

**Goal 2: Fisheries Research - Promote excellence in fisheries research.**

9. Manage sustainability of sport fish feed stocks, (ie krill, herring, needlefish, shrimp, other baitfish), which may be subject to overharvest and/or environmental issues. Manage biomass quantity, health, harvest levels, sustainability, locations, migration patterns, etc.
10. Complete research that will provide methods for the safe release at depth of sport caught DSR. Modify regulations and by-catch assumptions accordingly.

**Goal 5: Information and Education Services - Inform and educate the public about recreational fishing with an emphasis on exceptional customer service.**

11. Assure availability of accurate and timely data to manage the fishery, logbooks, research data, etc. Maintain the highest level of integrity in the accuracy and timeliness of the data.
12. Provide a database of both commercial and sport fishery historical information accessible and downloadable via the internet for research and analysis in preparation for BOF and ADF&G meetings.

Thank you for taking our comments into consideration. You have our commitment to work constructively with all concerned to ensure the health of our industry and the State's resources.

Sincerely,

//signed via email//

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